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Public consultation under Regulation 18
of the Town and Country Planning (Local Planning)
(England) Regulations 2012

Climate Emergency Review of the Local Plan

January 2022

STATEMENT OF CONSULTATION

Shaping
a better future

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1. Introduction

- 1.1 This Consultation Statement has been prepared in accordance with Regulation 18 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012. The Statement sets out how the Council considers it has fulfilled its statutory duty to consult and engage with the public on the preparation of the new Local Plan.
- 1.2 The council is currently reviewing its Local Plan which consists of a partial review (in the context of climate change) of Part One: Strategic Policies & Land Allocations Development Plan Document (DPD), adopted July 2020 and Part Two: Development Management DPD, adopted 2020.
- 1.3 The Strategic Policies & Land Allocations DPD sets out the future development needs for the district and will direct how these needs will be met, this includes providing for new housing, economic growth and other service provision. It identifies land which is worthy of protection for its economic, environmental or social value. This DPD sets out a series of allocations for both development and for protection which will provide certainty to local residents, businesses and developers on the scale and location of new development through the plan period.
- 1.4 The Development Management DPD sets out a series of generic planning policies which will be used by the Council's Development Management team and Planning Committee in order to determine planning applications. These policies will be applicable to a wide range of development proposals across the district.
- 1.5 On 30 January 2019, [the council declared a climate emergency](#). Whilst the newly adopted Local Plan documents does seek to address climate change, it was too far advanced in the plan preparation process to incorporate some of the actions and directions of the climate emergency declaration.
- 1.6 The council recognises its role in the district in contributing to climate mitigation to help global efforts to stem greenhouse gas emissions, as well as recognising the potential impact that a changing climate could have on the district and subsequently realises a concentrated effort to develop in ways which are designed to help adapt to climate change and build a climate resilient and ecologically supportive district.
- 1.7 Changes to planning policies as part of the Local Plan Review, have focused heavily on climate change mitigation and emissions reduction. This includes the protection, enhancement, maintenance and integration of the green and blue infrastructure network to allow for greater CO2 absorption, and a commitment to supporting, promoting, enhancing and further developing the cycling and walking network to encourage modal shift to reduce car journeys and hence emissions.
- 1.8 To further support this, higher quality public transport is expected in certain new developments, that are accessible within a reasonable safe walking distance, there is a requirement for the provision of electric vehicle charging points to encourage the take up of electric vehicles, and support for the responsible retrofit of and use of micro-renewables in heritage assets to allow for reduced energy use and green energy production.
- 1.9 There is also a requirement for solar gain, solar electric and thermal energy generation opportunities to be maximised to reduce energy consumption (energy consumption should also be reduced through higher energy efficiency requirements

for building fabrics), and the remaining energy that is consumed should at least partially come from on-site low carbon or renewable energy contributions.

- 1.10 The review also sets out a requirement for improved water efficiency standards to be met, alongside the inclusion of water efficiency and consumption measures such as rainwater recycling, waste reduction. In addition, embodied carbon must be considered to reduce usage of high carbon primary materials. The review also sets out that support will be given to renewable and low carbon energy generation development in the district where appropriate. Therefore, the development plan documents will play a significant role in aiming to meet the District's 2030 net zero target through mitigation measures.
- 1.11 In addition, the review proposes changes in relation to climate change adaptation, with focus considerably on development which adapts to climate change impacts. This includes a requirement for flood prevention, resilience and adaptation measures to be implemented and maintained, existing causes and impacts of flooding must be reduced, natural flood management techniques should be introduced, as should Sustainable Drainage Systems, prioritising natural solutions to provide co-benefits for users and nature, and the green and blue infrastructure network must be protected, enhanced, maintained and integrated to allow adaptive use such as shading from trees and reduced ground infiltration rates. Biodiversity Net Gain is also required for both flora and fauna to be more resilient to climate change, and similarly, development should enhance opportunities for protected species such as bats through the inclusion of appropriate roosting and nesting habitats. The review also now proposes that opportunities are provided for food growing space and onsite composting to target food insecurity risks.
- 1.12 In addition, buildings and spaces should be adaptable to changing climatic conditions, higher energy efficiency requirements for building fabrics are proposed to reduce energy consumption (which therefore lowers the risk of being impacted by energy shortages) and this is accompanied by a requirement for renewable and/or low carbon energy contributions on-site. The design of buildings must facilitate climate adaptation measures, alongside ensuring that the structure and fabric can be retrofitted through the lifetime of the building to allow for such measures, such as external shutters or ceiling fans.
- 1.13 It is proposed that water efficiency measures must be utilised which reduces possible impacts of water shortages from drought, and green/blue roofs or walls must be incorporated into the build.

2. Purpose of this document

- 2.1 This Consultation Statement provides a summary of the stages of engagement and consultation which the Council have undertaken in order to inform the preparation of the Strategic Policies & Land Allocations DPD and the Development Management DPD in order to address the requirements of national planning legislation.
- 2.2 For each stage of consultation, the Consultation Statement outlines:
 - Section 3: Who we consulted
 - Section 4: What we consulted on
 - Section 5: How we have engaged
 - Section 6: What issues were raised at Regulation 18 Stage and
 - Section 7: How the issues were addressed

3. Who we consulted

- 3.1 Through the plan-making process, the Council have sought to engage with the widest range of individuals, communities, organisations and stakeholders who may hold an interest in, or may be affected by, the content of the of the DPDs to make sure that those parts where clear that:
- The purpose of the DPDs, the process of preparing it and how and when they may be affected;
 - How and when they can comment on and get involved in preparing the DPDs and what they can and can't influence;
 - How and when their comments will be taken into account by the Council and when they can expect feedback; and
 - The remaining stages in preparing the DPDs and further opportunities to comment.
- 3.2 The **Statement of Community Involvement (SCI)** was reviewed in June 2020 and reflects the 2012 Regulations and the latest COVID restrictions. It sets out the Council's approach to engaging in preparing development plan document and in considering planning applications. The SCI identifies who we engage with. The table below is not exhaustive and is amended or added to as required.
- 3.4 In addition to the organisations set out in the table below the Council also consult with the general public, all Council Members, agents, developers and local businesses who sign up to the Council's Planning Policy Consultation Database.
- 3.5 It is important that this Consultation Statement is read in conjunction with the Duty to Co-operate Statement of Compliance which sets out the Council's approach to engaging with neighbouring authorities.
- 3.6 It is also important to note that during consultations, the Town and Country Planning (Local Planning) (England) Regulations 2012, sets out the Local Plan requirements for making consultation documents available at council's principle offices and such other places as the council deems appropriate, and the publishing of documents on the Council's website, (Regulation 35). This includes the draft Options of the Local Plan (Regulation 18), Publication draft of the Local Plan (Regulation 19), and the Submission draft of the Local Plan (Regulation 22). The Covid-19 pandemic meant that the closure of public buildings prevented this, however the council did make the documents available on the council website and provided the opportunity at the Regulation 18 consultation stage or any organisation or persons to request hard copies on request.
- 3.7 The Town and Country Planning (Local Planning) (England) Regulations 2012 define the 'specific consultation bodies' we must consult, see Table 1 below.
- 3.8 The Town and Country Planning (Local Planning) (England) Regulations 2012 define 'general consultation bodies' as voluntary bodies some or all of whose activities benefit any part of the authority's area and other bodies who represent, in the authority's area, the interests of different racial, ethnic or national groups; different religious groups; disabled persons; and, business interests.
- 3.9 As well as those mentioned above, the council online planning policy consultation list includes over 2300 consultees such as: community representation, schools (via Lancashire County Council), colleges and universities, general public and local communities, Lancaster district libraries, agencies and organisations, other

government bodies, businesses and commercial organisations, developers, landowners and agents and advocacy groups.

| Required Consultees (Specific Consultation Bodies) | |
|--|---|
| The Coal Authority | |
| The Environment Agency | |
| Historic England (Historic Buildings and Monuments Commission for England) | |
| Marine Management Organisation | |
| Natural England | |
| Office of Rail Regulation | |
| Network Rail | |
| Highways England | |
| Homes England | |
| Adjoining Local Planning Authorities | Barrow Borough Council Craven District Council Lake District National Park Authority Ribble Valley Borough Council South Lakeland District Council Wyre Borough Council Yorkshire Dales National Park Authority |
| Other Relevant Lancashire Councils | Bolton Council Burnley Borough Council Bury Borough Council Pendle Borough Council Rochdale Borough Council Rossendale Borough Council South Ribble Borough Council West Lancashire Borough Council Wigan Council |
| Area of Outstanding Beauty | Arnsdale and Silverdale AONB Forest of Bowland AONB |
| County Council | Cumbria County Council Lancashire County Council |
| Local policing body | Lancashire Police and Crime Commissioner Lancashire Constabulary |
| Relevant telecommunications companies | EE PO Broadband BT Openreach Vodafone O2 |
| Primary Care Trust or successor body | Clinical Commissioning Group |
| Relevant electricity and gas companies | National Grid (Electricity) National Grid (Gas) Electricity North West E.on British Gas |
| Relevant water and sewerage companies | United Utilities |
| Parish Councils* | |
| Lancaster City Councillors* | |

4. What we consulted on

Proposed Scoping consultation: 25th September - 20th November 2020

- 4.1 On adoption of the Local Plan in July 2020, the Council entered into an immediate partial review of the Local Plan to help address the Council deceleration of a climate emergency (made January 2019). The Plan did not revisit housing and employment land allocations and numbers and other areas such as Bailrigg Garden Village. The review was to only consider climate change issues in the context of the planning system.
- 4.2 Whilst much is prescribed at a national level within the National Planning Policy Framework (NPPF) which we must adhere to, the Council needed to determine what areas could be explored within the context of the planning system at the local level and how it might go about addressing the issues identified. The first stage in the process was a scoping consultation to help the Council decide which planning policies should be re-visited in the review of the Local Plan to address climate change.
- 4.3 The scoping consultation took place from 25 September 2020 to 20 November 2020, which determined the scope and policies for the Local Plan review of the two DPDs. The Evidence Base was drawn up, a Member Engagement event was held for all Council Members on 12th May 2021, and the draft policies were then finalised and incorporated into the two DPDs that have been the subject of the Regulation 18 consultation during the summer 2021.
- 4.4 This scoping consultation highlighted that there was significant support for the approach being taken by the council in aiming to tackle the Climate Emergency through planning policy. Support was generally given (75% of respondents) to the list of policies intended for review. The key topics and issues repeatedly raised as the top priorities to be addressed were:
- Transport and sustainable travel;
 - Green spaces, green & blue Infrastructure; and
 - Flooding and water management
- 4.4 At the start of this pre-regulation 18 consultation, we launched videos describing the scoping exercise and the list of suggested policies, [Appendix E](#), for changes in addition to holding several online engagement events and publishing all the consultation documents on the council website.
- 4.5 Further details on these engagement processes and outcomes are set out in more detail within [Appendix B](#) of this statement and key dates and stages are described in [Appendix C](#).

Regulation 18 Consultation: Climate Emergency Review of the Local Plan (23 July - 17 September 2021)

- 4.6 This next stage of consultation provided the first opportunity for members of the public and interested parties to comment on detailed proposed changes to the policies within the adopted Local Plan July 2020.

- 4.7 Similar to previous consultations, the review of the Local Plan provided the opportunity to highlight how the plan-making process has been refined and taken account of the previous round of consultation. The proposals included proposed specific policy approaches to those policies as identified for review during the scoping exercise in 2020.
- 4.8 At the same time, the council consulted upon the potential to introduce a Community Infrastructure Levy (CIL). The consultation included a draft charging schedule and was accompanied by a Viability Assessment which assessed the viability margin available for CIL, the Infrastructure Delivery Plan (IDP) and Schedule (IDS) which identified prospective sources of funding for infrastructure.
- 4.9 [Section 5](#) of this statement outlines how the council engaged in this round of consultation. [Section 6](#) outlines what issues were raised and [Section 7](#) outlines how these issues have been addressed.
- 4.10 Further details on these engagement processes and outcomes are set out in more detail within [Appendix B](#) of this statement and key dates and stages are described in [Appendix C](#).

Sustainability Appraisal and Habitat Regulation Assessment

- 4.11 A Sustainability Appraisal (SA) has been undertaken and prepared alongside the Local Plan by independent consultants AECOM. The SA describes the methodology by which the sustainability of the evolving strategy and policies of the Local Plan have been assessed and describes how the appraisal has informed the selection of sites and drafting of policies within the Plan.
- 4.12 The SA considers the individual and cumulative impacts of policies on sustainability objectives considering their social, economic and environmental impacts. Where potential adverse impacts have been identified mitigation measures have been included within the plan to remove or mitigate against them.
- 4.13 A Habitat Regulation Assessment (HRA) has also been undertaken. Under Article 6 of the Habitats Directive (and Regulation 102 of the Habitats Regulations) an assessment is required where a land use plan may give rise to significant effects upon a Natura 2000 site (also known as European sites). These include Special Areas of Conservation (SAC), Special Protection Areas (SPAs) and Ramsar sites. Prior to work commencing on the SA update addendum, a meeting was held with Natural England on 9th March 2020 to discuss our proposed approach.
- 4.14 Initial screening of the Local Plan was undertaken by independent consultants Arcadis. This identified the likely impacts on a European site of the plan, either alone or in combination with other projects or plans, and considered whether these impacts may have a significant effect on the integrity of the sites qualifying habitats and/or species. Whilst a number of sites and policies were screened out for further assessment a number of sites were identified as having potential, either alone or in combination, for likely significant effects on European sites triggering the need for Appropriate Assessment and a more detailed assessment of their impact on the integrity of the European Site.
- 4.15 Having undertaken the HRA/Appropriate Assessment AECOM are confident that with the mitigation measures proposed and now included within the Plan there will be no adverse effects on the integrity of the European sites.

- 4.16 The SA and HRA have been prepared in dialogue with key stakeholders including the three statutory consultees (Natural England, Environment Agency and Historic England). Key dates and stages are described in [Appendix D](#).

Health and Equalities

- 4.17 The council has consulted directly with a range of community groups and organisations by contacting via Microsoft teams and email. This has included organisations representing particular social groups including faith groups, people from minority ethnic backgrounds, people with disabilities and particular age groups, include the young and older people. The council have prepared an **Equalities Impact Assessment** which provides an assessment of how the content of the Local Plan has positive or negative effects on equality matters and, where negative, these impacts can be mitigated.
- 4.18 The council have also liaised closely with Lancashire County Council's Public Health team to ensure that the content of the Local Plan is considered for its positive and negative effects on matters of health, again where negative impacts have been highlighted the council have sought to refine the DPDs to mitigate such impacts. Key dates and stages are described in [Appendix C](#).

Duty to Co-operate

- 4.19 The Duty to Co-operate process was introduced by the Localism Act 2011 and places a legal duty on local authorities and other public bodies to engage constructively, actively and on an on-going basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross-boundary matters. A separate Duty to Co-operate Statement of Compliance has been prepared which outlines how the Duty has been satisfied for the Review of the Local Plan. A separate Duty to Co-operate Statement of Compliance will be prepared which outlines how the Duty has been satisfied for the preparation of the review of the Local Plan DPDs. *(make link prior to publication)*.

Updating and Reviewing the Evidence Base

- 4.20 Alongside the consultation work the council have been preparing a robust and relevant evidence base which underpins the decisions made on land allocations and wider policy within the Local Plan. A series of assessments and studies have been undertaken by the council or, alternatively the council have commissioned outside consultants to undertake such work to inform the preparation of the Review of the Local Plan. These have included:

- Topic Paper 1 – Water Management
- Topic Paper 2 – Green & Blue Infrastructure
- Topic Paper 3 – Strategic Transport
- Topic Paper 4 – Heritage considerations in the context of climate change
- Topic Paper 5 – Sustainable Design, Energy Efficiency & Renewable Energy
- Topic Paper 6 – Miscellaneous Policies
- Sustainability Assessment Scoping Report
- HRA Screening Report for Lancaster Local Plan Topic Papers
- Lancaster District Equalities Impact Assessment
- Rapid Health Impact Assessment (rHIA)
- Air Quality Position Statement Addendum
- Exploring opportunities for a low carbon district
- Heritage and Carbon Zero Paper

- Transport Assessment: Addendum
- Infrastructure Delivery Plan and Schedule
- Energy Efficiency Background Paper
- District Heating & Cooling Opportunities Study
- Climate Change Local Plan Review - Viability Assessment Reports
- Investigation into the promotion of macro and micro-renewable energy generation
- Green & Blue Infrastructure Strategy
- Cycling & Walking Planning Advisory Note (update)

4.21 The council also consulted on a Green & Blue Infrastructure Strategy. This draft Strategy aims to highlight the importance of connecting green and blue spaces together, their multifunctional value and the contribution they make towards the District-wide Green and Blue Infrastructure (GBI) network for the district. Further details on this engagement processes and outcomes are set out in more detail within [Appendix B](#) of this statement and key dates are described in [Appendix C](#).

4.21 Full details on the evidence which has been prepared (and is still being prepared) to inform the Review of the Local Plan can be viewed via the Document Library. (link to follow)

5. How we engaged (Regulation 18) 23 July 2021 to 17 September 2021

5.1 Table 5.1 below outlines the consultation methods adopted throughout all stages of the plan-making process in order to satisfy the requirements of a Regulation 18 consultation and to ensure that the requirements of the council's Statement of Community Involvement have been met.

| Requirements of Regulation 18 Consultation Statement in accordance with Town and Country Planning (Local Development) Regulations 2012 | How the council satisfied the requirement |
|--|--|
| Which bodies and persons the local planning authority invited to make representations under regulation 18. | <p>Planning Policy Consultation Database (www.lancaster.gov.uk/ppcl) consultees were notified on the opportunities to participate in preparation of the review of the Local Plan.</p> <p>The database consisted of residents and organisations who had been consulted on previous policy matters, those that had requested for inclusion and statutory bodies (as listed in the Statement of Community Involvement) for which the council must satisfy commitments to engage in ongoing duty to co-operate obligations.</p> |
| How those bodies and persons were invited to make representations under regulation 18. | This included a period of publicity across the Lancaster District, with a press notice placed in the Lancaster Guardian (a local newspaper) on 16 September 2021. A Storyboard was |

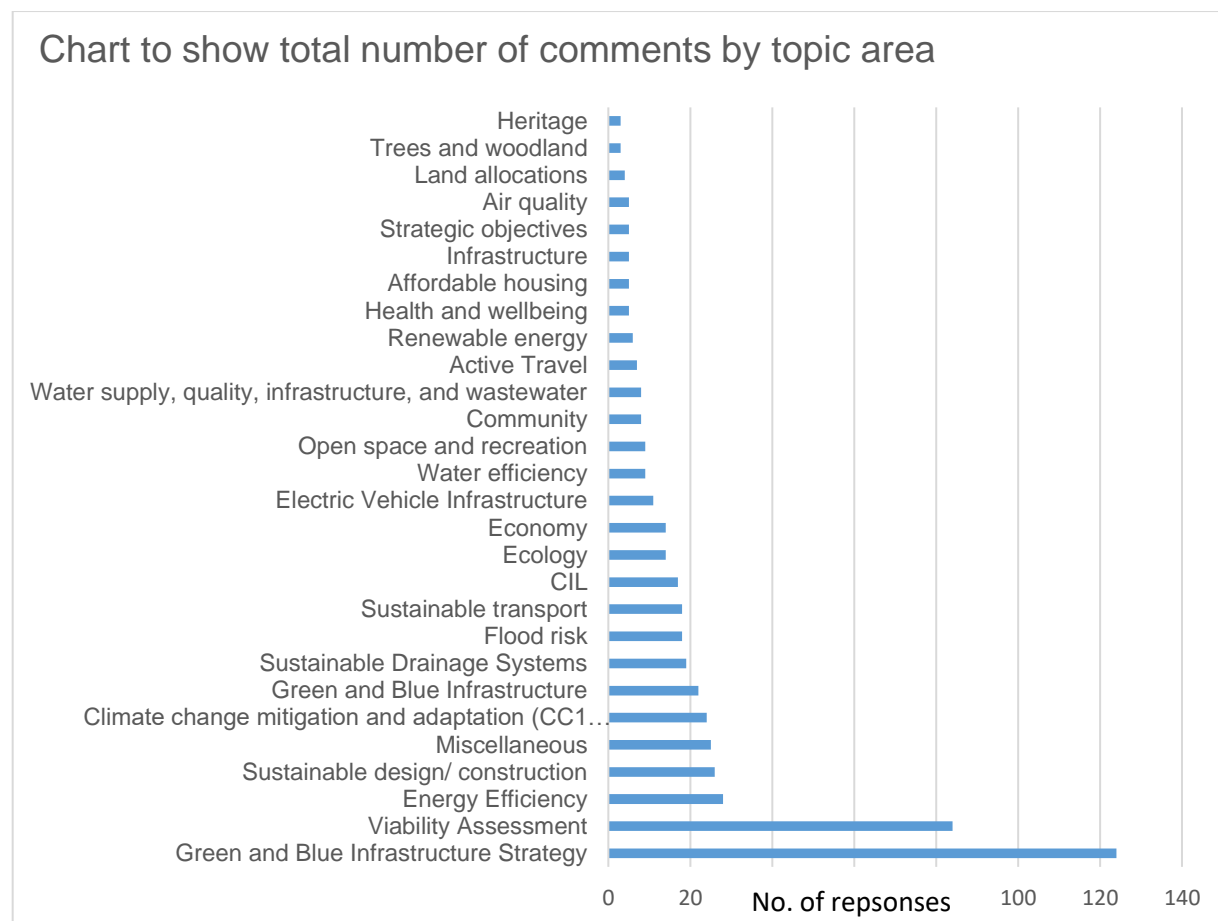
| Requirements of Regulation 18 Consultation Statement in accordance with Town and Country Planning (Local Development) Regulations 2012 | How the council satisfied the requirement |
|--|---|
| | <p>produced and all consultation material placed on a dedicated Local Plan review council website and stored in a document folder, (reference from PP022 to PP031) and can be viewed here</p> <p>An Engagement Plan was published outlining the timetable and a consultation leaflet was produced.</p> <p>Emails were sent to 2301 consultees on the Planning Policy consultation database</p> <p>500 posters (back page of the consultation leaflet) were distributed to council buildings, care home, restaurants, libraries, school, and many other venues across the district.</p> <p>Online events engagement events took place over the 8 week period and a Consultation Help Desk set up, (dates on the back page of the consultation leaflet)</p> <p>Copies of the consultation documents were only made available at the 'Principal Offices' on request, due to COVID restrictions.</p> <p>The consultation material explained:</p> <ul style="list-style-type: none"> ✓ How to get involved in preparing the DPDs and what can and can't influence; ✓ How and when comments can be made on the DPDs, ✓ How and when comments will be taken into account by the council and when they can expect feedback; and ✓ The remaining stages in preparing the DPDs and further opportunities to comment. <p>Further details on the publicity methods are set out in more detail within Appendix A</p> <p>Further details on the publicity material are set out in more detail within Appendix B</p> |
| A summary of the main issues raised by the representations made pursuant to regulation 18. | The main issues raised in the representations are summarised in Section 6 of this document. |

| Requirements of Regulation 18 Consultation Statement in accordance with Town and Country Planning (Local Development) Regulations 2012 | How the council satisfied the requirement |
|--|--|
| | <p>Summary paragraphs were generated through identifying general themes within the responses which allowed them to be grouped together. However, it should be noted that the council has considered and taken account of every individual comment.</p> <p>Full details on the main issues raised and officer responses are set out in Appendix H Summary Consultee Responses.</p> <p>Original consultation responses can be view here.</p> |
| How any representations made pursuant to regulation 18 have been taken into account. | <p>The council has responded to each comment submitted to the council following the period of consultation. Replies also outlined how the comments have informed the review of the Local Plan DPDs.</p> <p>Section 6 outlines what issues were raised.</p> <p>Section 7 outlines how these issues have been addressed.</p> |

Table: Regulation 18 consultation procedure

6. What issues were raised at Regulation 18 Stage?

- 6.1 Consultation on the Draft Climate Emergency Review of the Local Plan DPDs provided the first opportunity for members of the public and interested parties to comment on the finer detail of the emerging DPD policies for the district.
- 6.2 There were 44 separate consultee responses raising 544 comments. Of these 453 comments were 'general comments' on the content of the plan where neither support or objection was raised, 53 of those were explicit support and 38 were explicit objection, whether this be for a specific policy or an approach outlined in the plan, in general terms. Given the relatively narrow scope of the Local Plan, the range of responses received were focused upon a number of key topic areas. More details are set out in the table in [Appendix F](#).



6.3 Full details on the main issues raised and officer responses are set out in [Appendix H: Summary Consultee Responses](#).

6.4 The original consultation responses can be viewed [here](#).

Support for the tackling climate change

6.5 There was continued support for the aims of the review, first raised at scoping stage in 2020 and as outlined in [Section 4](#) of this report. It is clear that climate change issues are a significant consideration for local residents and, from the representations received, that the development industry is beginning to explore how it can be addressed within new developments. As a result, there was some degree of support from this industry of the approach Lancaster City Council is taking.

6.6 However, there was also clear resistance from many, mostly in terms of the speed of change that Lancaster is advocating through the review of the Local Plan. A number of respondents stated that they considered Lancaster City Council should not be setting its own energy efficiency targets and instead should follow the Government Future Home Standard consultation outputs. The council is however able to set its own targets as set out by the [Government within the Future Home Standard consultation outputs document](#). Chapter 2 of this document states: “We acknowledged the need to clarify Local Planning Authorities’ role in setting energy efficiency requirements for new homes that go beyond the minimum standards set through the Building Regulations. The new planning reforms will clarify the longer-term role of local planning authorities in determining local energy efficiency standards. To provide some certainty in the immediate term, we will not amend the

Planning and Energy Act 2008, which means that local authorities will retain powers to set local energy efficiency standards for new homes”.

- 6.7 The council considers that it's emerging approach will ultimately align with the aims of the future changes to national policy and building regulations. The approach will ensure that new development in the Lancaster District achieves central and local government energy efficiency measures in the most cost-effective way to ensure the wider policy aims are not compromised.
- 6.8 The Council anticipated concern from the development industry about how the carbon reduction targets in proposed policy DM30a could be achieved. A Development Industry Engagement Event was held on 27th July 2021 (within the consultation period). 275 invites were sent out to architects, housebuilder, agents, etc. The event included a presentation from [Enhabit](#) who provided information about the building techniques which developers could use to achieve the carbon reduction targets. Attendees had the opportunity to ask questions and for further guidance.

Viability

- 6.9 The most frequently raised concern came, predominantly, from the development industry, in relation to concerns over the impacts on viability arising from the proposed policy changes. The Council's viability consultant, Three Dragons attended the event held on the 27th July. They were available to answer questions about the impacts of the Council's approach on viability and how the approach is the most cost effective method.
- 6.10 Respondents raised specific issues with regard to the assumptions and methodology used in the Viability Assessment. The responses included a detailed critique submitted on behalf of a consortium of developers. It is acknowledged that there are differences of opinion with regard to the inputs and methodology used in the Viability Assessment. The Viability Assessment is however considered to be a robust piece of evidence which has been produced in accordance with the NPPF, nPPG and professional guidance. Specific concerns about the Viability Assessment have been summarised at [Appendix H](#) and an Addendum to the Viability Assessment has been produced to provide further clarity with regard to some of the inputs.
- 6.11 It is acknowledged that the requirement for a 10-year bus service funding within draft policy T4 had the potential to add significant cost. The policy has been amended to refer to contributions being determined on a case-by-case basis.
- 6.12 The Viability Assessment includes allowances for the proposed revised policy costs and S106 requirements. The accompanying information also explains how costs associated with the fabric first approach to the carbon reduction targets in proposed policy DM30a are commensurate or lower than various methods of achieving similar carbon reduction targets anticipated through Building Regulations. The Viability Assessment concludes that the proposed policy requirements can be accommodated without adversely affecting the viability of development within the district.
- 6.13 Respondents have requested the inclusion of a mechanism to be added to policies to allow for flexibility where they adversely impact viability. The plan should be read as whole and where viability issues do arise, the onus will be on an applicant to evidence the need to reduce contributions or not meet policy requirements. The impact of such reductions and lack of policy compliance will be considered on a case-by-case basis considering the development plan as a whole, sustainable development and national policy. Specific reference in each policy to a flexibility is therefore not considered necessary.

Policy CC1: Strategic Policies & Land Allocations DPD

- 6.14 There were a small number of responses in relation to Policy CC1. The issue raised mainly in relation to this policy was that Policy CC1 should be viewed as a vision rather than a policy. However, the council consider that Policy CC1 is a strategic policy, and, as with all the other strategic policies that exist in the Strategic Policies Land Allocations DPD, they are of a high-level and set the scene. The council considers that the policy ensures that climate change is placed at the heart of all planning application decision making.

Community Infrastructure Levy (CIL)

- 6.15 Similar responses with regard to the assumptions and methodology used in the Viability Assessment were made in respect of a prospective CIL. Respondents agreed that the strategic sites should not be charged due to the site-specific costs. It was also commented that development in the Broad Location for Growth in South Lancaster should also be subject to a zero-levy due to the costs associated with strategic infrastructure.
- 6.16 The development industry raised concerns that the introduction of CIL, especially in combination with the DPD policy requirements would adversely affect viability to the point that deliverability of development within the Local Plan would be compromised.
- 6.17 Positive responses were received from the community. Support was received for CIL and its use for measures to support the reduction and mitigation of climate change, including green infrastructure, flood mitigation, food growing opportunities and sustainable transport measures.
- 6.18 If a CIL were to be introduced, it would be a non-negotiable payment. Where the overall contribution and policy requirements result in development which would be unviable, CIL would take precedence over other potential S106 contributions for infrastructure and potentially the policy requirements within the Local Plan DPDs.
- 6.19 The Viability Assessment provides evidence that a CIL is viable, subject to certain exemptions, together with the proposed policy requirements. It is however considered that ensuring the policies aimed at reducing and mitigating climate change are adopted, should take precedence. It is therefore not intended to pursue the introduction of CIL at this time. Detailed comments can be viewed in [Appendix H](#).

Green and Blue Infrastructure (GBI)

- 6.20 As shown in [Appendix F](#), 124 individual comments were made during the consultation in response to the Green and Blue Infrastructure (GBI) Strategy. Given this is the first time the council has formally published a GBI Strategy, and due to its scale, and role in informing and underpinning the Strategy, it was considered appropriate to run a separate consultation on the GBI Strategy (alongside the draft Regulation 18 Climate Emergency Review of the Local Plan consultation). The amount of feedback received in response to the GBI Strategy demonstrates that this Strategy was of particular interest and in itself justifies the council's consultation approach. From the comments received it was evident that respondents had spent time going through the Strategy.
- 6.21 Some of the key issues raised related to the need to address the role of peatland, saltmarsh, rewilding and farming in creating a better connected and more multifunctional GBI network. Also, the need for greater emphasis upon nature recovery and also the role of trees. A number of projects were also put forward for inclusion within the emerging GBI Action Plan and a number of suggestions were

also made in relation to the GBI interactive map which accompanies the GBI Strategy, such as new data suggestions and user guide tips.

- 6.22 In relation to the specific GBI related policies themselves in the two DPD's, comments highlighted the need for greater clarity on the role and weight of the GBI Strategy and accompanying GBI interactive map. Also, better acknowledgement of the green and blue spaces/assets that contribute towards the Green and Blue Chains and Corridors identified in policy SC4 (i.e tributaries feeding into the main river corridor). Changes made to the policies as a result of the GBI Strategy were generally welcomed, recognising the importance of connectivity and multifunctionality, and also in particular, the requirement for GBI Management and Maintenance Plans to make sure these benefits are secured long-term.
- 6.22 A number of comments were also received in relation to food growing opportunities and community engagement. It was suggested that specific areas should be identified for food growing but given the nature of this partial review, land use studies are outside the scope of this partial review of the DPDs, and so greater emphasis has been placed within policy wording for the need to provide opportunities for food growing space within the design of new development and to incorporate space for onsite composting (in policy DM29). Further guidance will also be provided within the emerging "Acknowledging the Emergency: Developments built for community, climate, and environmental resilience" SPD. It was also suggested that specific GBI standards could be put in place, however, given the nature of this partial review, setting specific GBI standards is considered to be outside the scope of this review and would be more appropriate to explore as part of a full Local Plan Review.
- 6.24 Queries were also raised in relation to the updates to Appendix D of the Development Management DPD which have been incorporated to reflect the most up-to-date evidence base that was used to underpin the adopted Local Plan. As a result, Appendix D of the Development Management DPD has been revised for clarity and consistency purposes. Specific detailed comments can be viewed in [Appendix H](#) of this report.

Strategic Transport

- 6.25 Concern was raised that the potential requirement to fund a new or enhanced bus service for up to 10 years could have a significant impact on viability. It was stated that the provision of such a service from first occupation, when a development would generate very little demand for travel, would not, necessarily be the best use of funding. Residents stated that it was not possible in all cases of a current deficiency, to provide new or enhanced services as this requires public transport operators to be supportive of, and willing/able to provide additional services. Respondents suggested that instead, a bespoke package of sustainable measures should be developed on a site-by-site basis, rather than a 'one size fits all' approach, and that the policy wording should not reference specific requirements of public transport provision. As a result the DPD has been amended for the Regulation 19 stage to reflect this, and the position now remains as set out on the adopted local Plan.
- 6.26 Also on this matter, in response to the consultation responses a definition of better buses has been added to the glossary for the purposes of clarity.
- 6.27 Other changes are in response to consultation responses on walking and cycling matters. The mapping associated with Policy T2 setting out the strategic network has been clarified, and further supporting text has been provided regarding the need for segregated routes. Clarification was sought by respondents on cycle storage and potential implications on garage sizes required under Policy DM62. The level of

information provided in Appendix E is considered sufficient and, for clarity, the policy wording has been amended and remains as presented in the adopted Local Plan.

Bailrigg Garden Village

- 6.28 There was confusion from some stakeholders over how the Climate Emergency Review of the Local Plan and how it related to parallel work which is ongoing for future development in South Lancaster and Bailrigg Garden Village (which is being progressed through the Lancaster South Area Action Plan). This is understandable given the significance of the documents and that they are advancing at a similar time (albeit they are at differing stages of preparation). The Council are, however, confident that the information surrounding the progress on these two elements of work has been clearly presented through the Council's website, social media channels and newspaper press releases. It ensures there has been distinction and clarity between the separate progress made on the Climate Emergency Review and the Area Action Plan.

NPPF referencing changes

- 6.29 Comments were received during the Regulation 18 consultation stage in relation to the continued reference to the 2012 NPPF, with requests that this be updated to the 2021 version. The NPPF was first published on 27 March 2012 and updated on 24 July 2018, 19 February 2019 and 20 July 2021.
- 6.30 However, as the adopted Local Plan was prepared upon (for the majority) the 2012 NPPF, and the majority of policies fall outside of the scope of climate change, then it hasn't been possible to amend every reference for the Publication version of the Climate Emergency Review of the Local Plan.
- 6.31 For those 'scoped-in' policies however, the Climate Emergency Review of the Local Plan relies upon the 2021 version of the NPPF. Therefore, all subsequent references to the NPPF in the CELPR are references to the 2021 version. Where previous versions of the NPPF are referred to however, for the reasons outlined, this has been made clear in the Publication version of the Climate Emergency Review of the Local Plan DPDs. In total 47% of all those changes made to the Publication version have related to this issue of making the NPPF reference clearer.

Issues in relation to water management

- 6.32 The respondents were supportive of the proposed changes to the water management policies and the aims to reduce flood risk and enhance SuDS.
- 6.33 The proposals did receive some criticism that there were inconsistencies with national guidance, in particular with regard to the exception test and the requirement for gardens/play areas to be free from flood risk. Proposed Policy DM33 has been amended to address consistency with regard to the exception test. Keeping gardens and play areas free from flood risk and ensuring they are usable is however considered important for amenity and health of residents.
- 6.34 It was commented the opportunity had been missed to ensure sites with watercourses managed peak flows and to set out ambitious flood risk reduction targets. Proposed Policy DM33 has been amended to address peak flows. However, as the CELPR does not review allocations, housing number or densities it is not considered that setting specific runoff reduction targets is feasible. The policies do require sites to contribute to a reduction in flood risk and this will be determined on a case-by-case basis.

- 6.35 The Sustainable Drainage Hierarchy in proposed Policy DM34 has been amended to better reflect the use of SuDS, attenuated source control and the opportunities to reduce flood risk and pollution at source. The lack of reference to a funding mechanism for management and maintenance was also highlighted. This has subsequently been added to the policy.
- 6.36 The cost implications of including SuDS and a need for flexibility in determining the detail of schemes has also been highlighted. The approach to SuDS should not incur additional costs as it follows the approach already in national guidance. The policy does not set out a specific design detail but the principles for the approach to flood risk management and SuDS.

Monitoring Framework

- 6.37 As part of the CELPR, changes have been made to some of those policies contained in the adopted Local Plan and there have also been a small number of additional, new policies added. As a result, it was felt necessary to revisit the monitoring framework that accompanies the Local Plan (at appendix F of the Strategic Policies and Land Allocations DPD). The changes made to this framework are minor but will ensure that important data is collated once the CELPR has been adopted and is being implemented to ensure that the policies are doing all they can to tackle the climate emergency.

Sustainability Appraisal Recommendations

Electric Vehicle (EV) Charging Infrastructure

- 6.38 Through the Sustainability Appraisal (SA) of the draft Regulation 18 version of the Climate Emergency Review of the Local Plan, it was highlighted that the changes to proposed Policy DM62 would be likely to facilitate notable changes to the street scene. In particular, the need for development to provide electric vehicle (EV) charging units, including standalone units, which would be visually intrusive in certain locations, affecting the setting of heritage. The SA recommended that “there will be a need to promote sensitive designs in such locations, and it is assumed that such matters will be addressed in the Provision for Electric Vehicle Charging Points for Development Supplementary Planning Document”. Consequently, additional wording has been added into proposed Policy DM62 to ensure EV charging infrastructure is designed to respect the character of the surrounding built environment, streetscape and public realm. The policy wording now also states that particular regard should be given to the impact upon the historic environment. Further design guidance will also be provided in the aforementioned SPD.

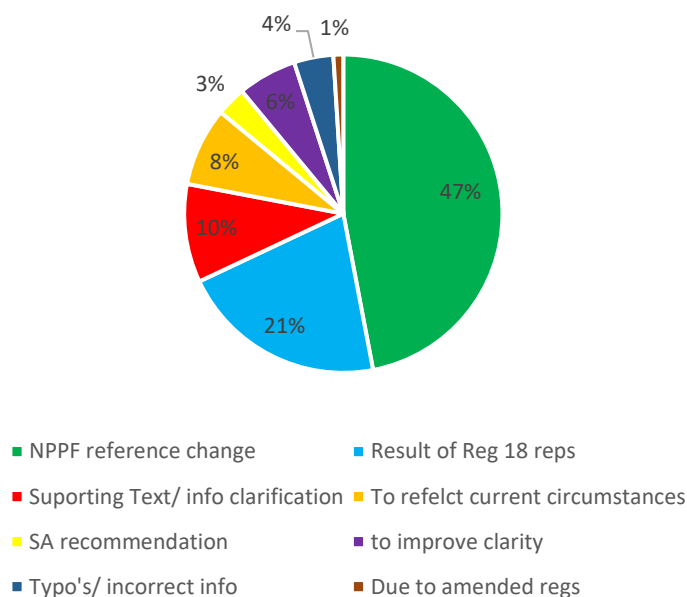
7. How these issues were addressed

Responses to the Climate Emergency Review of the Local Plan DPDs

- 7.1 As highlighted in [Section 6](#) of this statement, the Council received a range of responses to the content of the draft Local Plan, below these issues are set out in more detail and an explanation provided to how these issues have been dealt with in the preparation of the Publication version of the Local Plan.
- 7.2 The issues raised in response to the Regulation 18 consultation resulted in 143 amendments being made to the plan, whether these be changes to policies or supporting text as a result of queries raised, or simple editorial changed to text for the purposes of clarity. These changes are set out in the

Table of changes between Regulation 18 and Regulation 19 report in [Appendix G](#) of this report.

- 7.3 Whilst 143 changes were made, for some of the changes these were made for multiple reasons. For example, the issue was raised as part of the Reg 18 consultation response, but also as part of the Sustainability Appraisal work – so, for the avoidance of doubt, in this regard some changes are technically double counted. The chart below provides a generalised analysis of the reasons for changes to the DPDs following the closure of Regulation 18 consultation:



- 7.4 Whilst this chart provides some generalised information on the numbers of responses the council received in certain areas, the table below sets out the changes the council is proposing to the Regulation 19 version of the Climate Emergency Review of the Local Plan DPDs, set out by thematic topic area.
- 7.5 The table is useful in highlighting that only a small number of material changes are being made to the plan as a result of the consultation responses (just 20% of those received). The remainder (80%) are typographical changes/ points of clarification as can be seen in chart above.

| TOPIC AREA | POLICY | PROPOSED CHANGE TO THE PLAN |
|---------------------|------------|---|
| STRATEGIC TRANSPORT | T4 | Change to duration of support for funding of bus services (no longer 10 years) |
| | Appendix A | Inclusion of Better Buses definition |
| | T2 | Further detail provided r.e. segregation of cycle and walking paths. Inset map updated to show network in/around Lancaster city centre. |
| | DM62 | Includes requirement to carefully consider design of EV charging infrastructure in terms of mobility access and impact upon historic environment. |

| TOPIC AREA | POLICY | PROPOSED CHANGE TO THE PLAN |
|---|--------|--|
| | DM64 | Although the County Councils aspirations have changed to 'Better Buses' the Policy refers back to published Masterplan which includes 'Morecambe and Heysham'. |
| HERITAGE CONSIDERATIONS | DMCCH1 | Highlight where responsible retrofit is not achieved, can lead to unintended consequences. Can consider renewables under CCH2 |
| | DMCCH2 | Consider Conservation Areas, Registered Parks & Gardens and Landscape Character |
| | DM59 | NPPF related change = include reference to urban areas and highlight importance of greater connectivity |
| SUSTAINABLE DESIGN, ENERGY EFFICIENCY & RENEWABLE ENERGY | DM30c | Further requirements set out r.e. materials, waste and construction e.g. materials reused and recycled, full lifecycle of building to be considered, use local suppliers, renewables and green and blue roofs |
| | DM29 | Reference to providing space for composting and need for private gardens to be free from flooding risk and well drained. Reference to importance of site layout and building orientation for solar gain, energy efficiency etc. Further detail r.e. impact of light pollution. Reference to Glasgow Food and Climate change Declaration that Council has signed up to. |
| | DM30b | Design of new development is now to maximise water efficiency and consumption measures. E.g. greywater recycling, low flow taps and showers |
| | DM30a | Added reference to EmerPHit certification |
| | DM53 | Highlight matter of urgency of transitioning to a lower carbon future (electricity and thermal). Also to give consideration to impact of renewable and low carbon energy schemes on the AONB. New requirements set out in relation to energy (battery) storage. Removal of 'District' from heating and cooling networks and inclusion of 'thermal' energy. Update providing on funding for heating and cooling |

| TOPIC AREA | POLICY | PROPOSED CHANGE TO THE PLAN |
|--|------------|---|
| | | networks and current Government consultation. New supporting text in relation to battery storage. |
| GREEN & BLUE INFRASTRUCTURE | DM45 | Reworded to include reference to street trees and consideration of trees (natural growth) throughout lifetime of development and importance of long-term maintenance. |
| | SP8 | Highlight importance of biodiversity net gain and nature recovery, and emerging need for Local Nature Recovery Strategy. Supporting text now clarifies role of GBI Strategy i.e. map not an allocations map. Now says Council will work with all stakeholders and communities to address issues of flood risk. |
| | SC4 | Recognition of green and blue assets that contribute to these strategic GBI chains and corridors, i.e. river tributaries to main rivers, and linkages between them. Supporting text now also clarifies that this is an indicative spatial policy rather than making specific land allocations. |
| | DM43 | Cross reference to DM45 for detail required in terms of management and maintenance of landscaping. Also further clarity there where appropriate GBI Management and Maintenance to include all 6 key uses (recreation, ecology etc.) |
| | DM27 | Emphasis upon importance of evidencing loss of economic, environmental or community value. |
| | Appendix D | Reference to the playing pitch calculator for clarity |
| WATER MANAGEMENT | DM33 | Revisions to ensure the requirement for an exception test is consistent with the NPPF. Inclusion of reference to package treatment plants when dealing with foul water. Amendment to include reference to managing peak flows when improving watercourses. High Risk Urban Catchment Map added. |
| | DM34 | Amendments to better reflect the use of attenuated source control, conveyance and attenuation measures to address flood risk and |

| TOPIC AREA | POLICY | PROPOSED CHANGE TO THE PLAN |
|---------------------------------------|------------|--|
| | | pollution, Reference also added to require appropriate safety measures in SuDS design. Clarification added to ensure Sustainable Drainage Strategy's address post completion flood risk and inclusion of need for funding mechanism in Maintenance Plan. |
| STRATEGIC (general) POLICIES | CC1 | Include need to recognise the important role that the District's soils provide in mitigating climate change through carbon storage and sequestration. Change from should to 'will' integrate principles of sustainable design. |
| | SP4 | Supporting local food supply chain and local food systems added as another priority. Also need to support transition to a low carbon economy and support major renewable energy projects where appropriate. |
| | SP9 | Include reference to community spaces |
| LANCASTER CITY CENTRE/ ECONOMY | SG4 | Town Centre Strategy to also improve local food supply chains and local food systems |
| OTHER (MISC) | Monitoring | Inclusion of updated monitoring framework |

- 7.6 Detailed comments can be viewed in [Appendix H – Summary Consultee Responses](#). This information has been presented by development plan document, policy number although can also be searched by name and response.
- 7.7 Original consultation responses can be view [here](#).

8. Appendices

Appendix A: Publicity Methods

| Methods | Main consideration |
|---|---|
| Documents made available for inspection | This is a minimum requirement as set out in the Regulations. Relevant documents will be made available for inspection during consultation period at the council's offices in the Lancaster and Morecambe Town Hall and libraries in the Lancaster District. The Covid-19 pandemic meant that the closure of public buildings prevented this, however the council did make the documents available on the council website and provided the opportunity at the Regulation 18 consultation stage or any organisation or persons to request hard copies on request. |
| Website | Each consultation stage will feature prominently on the homepage of the council's consultation ¹ and planning policy webpages. This will link directly to information on document production, providing access to the consultation material and advice on how and when comments can be made. Articles providing updates on plan production, which may include consultation and engagement opportunities, may be published in the council's online news section periodically but it will not be solely relied upon as a means of communication. |
| Adverts/public notices | Notices placed in a local newspaper advertising consultation and engagement opportunities, where appropriate. Statutory requirements to publish notices advertising certain planning applications |
| Mailing List – Email / Letter | The council operates a database of individuals and organisations that have expressed an interest in the plan-making process, have previously been actively involved in policy development or are statutory consultees. Those who wish to be involved will be directly notified at each stage either through email or letter of opportunities to comment. Those who are interested in planning policy development and wish to be notified can be included on the council's mailing list at any time ² |
| Press release | To be undertaken in accordance with the councils media team, Media briefings/press releases will be issued to local media. Although items may only be reported if they are considered newsworthy by the newspaper editors, therefore publication is not guaranteed. |
| Parish and Town Council and Community Group publications | These types of publications are distributed to local residents. The council will work with relevant organisations to utilise these publications to notify residents of consultation and engagement opportunities, where possible. Consideration will need to be given to the timing of the consultation, and the timing and circulation of any publications outside the council's control. |

¹ www.lancaster.gov.uk/consultation

² www.lancaster.gov.uk/ppc

| Methods | Main consideration |
|--|--|
| Posters | Posters may be sent to relevant Parish and Town Councils and libraries to be displayed on notice boards to raise awareness of any public consultation and engagement opportunities. Posters may also be displayed in other appropriate locations across the District. |
| Leaflets | Leaflets may be used to gain wider public awareness of a consultation or engagement opportunity, for example leaflets may be distributed at key attractors/destinations such as train stations and local schools. |
| Social Media | Media such as Twitter ³ , Instagram and Facebook ⁴ will be used to highlight public consultations on planning policy documents with direct links to the council's website and information on how to comment, and any engagement events. Such messages may be retweeted periodically throughout the consultation period. However, comments will not be accepted via social media. |
| Events | Such events may include drop-in sessions, public exhibitions and/or targeted workshops. Parish and Town Council meetings will be utilised where possible. The type of event undertaken will be dependent on a number of factors, including the consultation stage, and time and resource constraints. Careful consideration will be given to the timing, venue and format of events to ensure accessibility and inclusivity. |
| Key stakeholder Groups | We will liaise with key stakeholder groups at key stages in the plan making process, to discuss issues and keep them informed of progress. |
| Questionnaires / surveys | Questionnaires / surveys may be used to focus comments and to help ensure that feedback relates to issues that are within the scope of the document being consulted upon. |
| Meetings with communities / organisations | We will arrange meetings with local communities where proposals may have a significant local effect. We will respond positively to requests for other meetings, where time and resources allow. The media, posters and leaflets may be used to advertise public meetings. |

³ [twitter@lancastercc](https://twitter.com/lancastercc)

⁴ <https://www.facebook.com/lancastercc>

Appendix B: Consultation and Engagement Details

It is important that this Consultation Statement is read in conjunction with the Duty to Co-operate Statement of Compliance which sets out the council's approach to engaging with neighbouring authorities.

Scoping Consultation; (25th September - 20th November 2020)

An eight-week consultation took place from 25 September 2020 to 20 November 2020 and the online survey continued to be available until 1 February 2021.



Consultation documents and material

This included a period of publicity across the Lancaster District, with 500 [consultation leaflets](#) and a public notice placed in Lancaster Guardian (a local newspaper) on Thursday 24 September 2020. A press releases were also issued on Friday 25 September 2020. Information on the

Scoping Consultation; (25th September - 20th November 2020)

consultation was published on the council [webpages](#) and a [storyboard](#) produced. Copies of the consultation documents were only on request due to COVID restrictions.

At the start of this consultation we launched a [introductory video](#) and a [presentation](#), describing the scoping exercise and a list of [suggested policies for changes](#) (also listed in [Appendix E](#)), in addition to producing a FAQ and a [list of questions](#) for people to respond to.

In addition, we launched 5 topic video's week commencing 19 October 2020 of which we have 244 views:

- ✓ [Heritage & Climate](#),
- ✓ [Energy Efficiency in New Housing](#),
- ✓ [Blue-Green Infrastructure](#),
- ✓ [Sustainable Transport](#),
- ✓ [Water Management](#)

Newsletter (emails) were sent to 2303 consultees on the [Planning Policy consultation database](#) notifying them of the opportunity to participate in the scoping exercise consultation, sent 15 September 2020, 25 September 2020 and a second reminder just before the closing date

- ✓ All the consultation material can be found in the [Document Library](#) (Reference LPR001)

We held several online engagement events for young people and stakeholders. Key dates and stages are described in [Appendix C](#).

Following the conclusion of the consultation all comments and responses received were analysed and their implications to the council's approach to the review of the two DPD production considered.

Further details on the publicity methods are set out in more detail within [Appendix A](#)

Further details on the publicity material are set out in more detail within [Appendix B](#)

Scoping Consultation; (25th September - 20th November 2020)

Representations received

The council received formal representations from 76 respondents. These were received by email (55% of responses) or by completing the online questionnaire (45% of responses). 82% of these were completed by members of the public.

It was evident during analysis of the responses that a high proportion of respondents had viewed the consultation topic videos that the planning policy team put together for the website, as many of the consultation responses were grouped under the themes set out in these videos. This was a very successful method of consultation engagement and one that was subsequently used in future consultations. The themes covered can be view in the video links above.

Main issues raised

Overall responses to the consultation were in support of the approach being taken by the council in aiming to tackle the Climate Emergency through planning policy. Support was given (75% of respondents) to the [list of policies set out for potential review](#), (also in Appendix E) with a some requesting additional policies to be reviewed. In most cases these related to a request to reassess land allocations, which is out of the scope of the review to the Local Plan and will instead be addressed as part of a full plan review following this partial review. The policies most frequently raised were DM34, DM30, DM2, DM58, DM29, SP9 and SP10.

Raised by most agents and developers were questions regarding the potential effects of policy amendments on viability. Whilst they were all generally supportive of the review and what it aims to achieve, they reserved the right to fully comment on the implications until a draft plan has been produced and repeatedly highlighted that viability is crucial to ensure the plan does not have a negative impact on what they consider to be much needed housing. At the time of this consultation procurement for an availability assessment was underway.

The table below sets out the number of respondents highlighting policy and the policies specifically noted to be challenged by developers:

| Strategic Policies & Land Allocation Policy | Number of respondents highlighting policy | Policies specifically noted to be challenged by developers |
|---|---|--|
| T2: Cycling and Walking Network | 37 | X |

Scoping Consultation; (25th September - 20th November 2020)

| | | |
|--|----|---|
| SC4: Green Space Networks | 36 | |
| SP8: Protecting the Natural Environment | 34 | |
| T4: Public Transport Corridors | 31 | |
| SP10: Improving Transport Connectivity | 27 | X |
| SP9: Maintaining Strong and Vibrant Communities | 25 | X |
| T1: Lancaster Park and Ride | 25 | |
| EN9: Air Quality Management Areas | 23 | |
| SP4: Priorities for Sustainable Economic Growth | 23 | X |
| SC5: Recreation Opportunity Areas | 22 | |
| SG4: Lancaster City Centre | 20 | |
| SG12: Port of Heysham and future expansion opportunities | 18 | |
| SG13: Heysham Gateway, South Heysham | 18 | |
| SG1: Lancaster South Broad Location for Growth | | |
| SG3: Infrastructure Delivery for growth in South Lancaster | | |

| Development Management DPD Policy | Number of respondents highlighting policy | Policies specifically noted to be challenged by developers |
|--|--|---|
| DM43: Green Infrastructure | 38 | X |
| DM45: Protection of Trees Hedgerows and Woodland | 37 | X |
| DM53: Renewable and Low Carbon Energy Generation | 37 | |
| DM34: Surface Water Run-Off and Sustainable Drainage | 36 | X |
| DM61: Walking and Cycling | 35 | X |
| DM30: Sustainable Design | 34 | X |
| DM2: Housing Standards | 32 | X |
| DM27: Open Space, Sports and Recreational Facilities | 30 | X |
| DM31: Air Quality Management and Pollution | 29 | X |
| DM33: Development and Flood Risk | 29 | X |

Scoping Consultation; (25th September - 20th November 2020)

| | | |
|---|----|---|
| DM57: Health and Well-being | 27 | X |
| DM35: Water supply and Waste water | 26 | X |
| DM36: Protecting water resources and infrastructure | 25 | |
| DM58: Infrastructure delivery and funding | 25 | X |
| DM60: Enhancing accessibility and Transport linkages | 24 | X |
| DM29: Key Design principles | 24 | X |
| DM64: Lancaster District Highways and Transport Masterplan | 23 | |
| DM63: Transport efficiency and Travel Plans | 23 | X |
| DM59: Telecommunications and Broadband Improvements | 17 | X |
| DM44: The Protection and enhancement of biodiversity | 4 | |
| DM1: New residential development and meeting housing needs | | |
| DM26: Public realm and civic space | | |
| DM3: The delivery of affordable housing | | |
| DM25: The evening and night-time economy | | |
| DM51: Equine related development | | |
| DM13: Residential conversions | | |
| DM16: Town Centre Development | | |
| DM37: Development affecting Listed Buildings | | |
| DM38: Development affecting Conservation Areas | | |
| DM39: The setting of Designated Heritage Assets | | |
| DM40: Registered Parks and Gardens | | |
| DM41: Development affecting non-designated heritage or their settings | | |
| DM55: Neighbourhood Planning | | |

Scoping Consultation; (25th September - 20th November 2020)

The table below sets out the main issues that were highlighted during the consultation, indicating the issues of most concern to respondents, issues repeatedly raised as the top priority to be addressed through the review of the Local Plan being: transport and sustainable travel; green spaces and green & blue Infrastructure; and flooding and water management:

| Issue of concern in relation to climate change | Number of times raised in direct response to question '<i>What are the 3 issues that are most important to you in terms of climate change</i>' | Number of times raised in responses that didn't directly answer that question (or any questions – but provided a more general response) | Overall number of times issue raised |
|--|---|--|---|
| Transport/sustainable travel | 26 | 18 | 44 |
| Green Spaces (inc. natural environment/biodiversity/trees and open spaces) | 19 | 16 | 35 |
| Flooding/water management | 18 | 14 | 32 |
| Housing – energy efficiency | 16 | 13 | 29 |
| Renewable Energy | 11 | 4 | 15 |
| Air pollution | 5 | 2 | 7 |
| 'Approach to climate change' e.g. monitoring (inc. Performance evaluation, practical solutions – working together) | 5 | 2 | 7 |
| Sustainable/Local Food production | 6 | 0 | 6 |
| Recycling | 5 | 0 | 5 |
| Use brownfield land (land use) | 3 | 0 | 3 |
| Light pollution | 2 | 0 | 2 |
| Local employment (e.g. office hubs) | 2 | 0 | 2 |
| Carbon emissions (more generally)/Net zero target | 2 | 0 | 2 |
| Noise pollution | 1 | 0 | 1 |
| Capitalism/consumerism | 1 | 0 | 1 |
| Broadband | 1 | 0 | 1 |

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| | | | |
|-------------------------------------|---|---|----------|
| Rising temperatures | 1 | 0 | 1 |
| Renovate buildings (not build more) | 1 | 0 | 1 |
| Climate justice | 1 | 0 | 1 |

Bailrigg Garden Village was also raised on a small number of occasions but concerns with this centred around how the creation of a garden village sits with the overall declaration of a climate emergency. Issues raised on this subject included '*how does building new houses fit with the declaration of a climate emergency*' and '*won't people just drive out of the District to access work thereby exacerbating transport and emission issues*'? As Members are aware the Planning Policy and Housing Strategy team are currently producing an AAP for the BGV, wherein all these matters will be considered and addressed.

What was apparent during the consultation, and in the responses, was the significant level of interest and assistance that key stakeholders were prepared to offer to assist with the review of the Local Plan DPDs. To ensure these offers of assistance were utilised, despite the tight timescale for plan production, the planning policy team set up a number of topic area specific meetings with these stakeholders to ensure that discussions took place early in the plan production. In addition, key stakeholder meetings/workshops also took place (online) with a wider range of attendees than is possible in a meeting. These allowed for larger group discussions to take place on the proposed policies for the DPDs and in some of these sessions, break out rooms on specific topic areas were used. Key dates are described in [Appendix C](#).

Regulation 18: Climate Emergency Review of the Local Plan Consultation

An eight-week Regulation 18 consultation took place from 23 July 2021 to 17 September 2021

People Homes Jobs

Have YOUR say

Public consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012

Climate Emergency Review of the Local Plan

Public consultation
Friday 23 July to 5pm Friday 17 September 2021

Shaping a better future

LANCASTER CITY COUNCIL
Providing City, County & Community

Climate Emergency Review

The council adopted a new Local Plan for Lancaster District in July 2020. The Plan consists of Part One (Strategic Policies & Land Allocations DPD) and Part Two (a Reviewed Development Management DPD).

The Plan provides a formal planning framework for Lancaster District in terms of providing strategic direction on future growth and identifying land which should be protected for its social, environmental, and economic value.

The council declared a Climate Emergency in January 2019. This was accompanied by a series of actions and ambitions on addressing climate change. The council's declaration came too late in the local plan process to take account of the Climate Emergency Declaration (the Local Plan had been submitted to Government in May 2018).

Consequently, in adopting the Local Plan in July 2020, the council resolved to undertake an immediate review of the Local Plan specifically to further consider Climate Change, following the council's declaration of a Climate Emergency.

Further information:
To receive further updates, please sign up to the planning policy consultation list at www.lancaster.gov.uk/planningpolicyconsultation

Background and how we have got to where we are

Climate Emergency Local Plan Review

The Local Plan Review essentially reviews two key documents, the *Local Plan Strategic Policies and Land Allocations Development Plan Document (DPD)* which sets out a spatial vision and strategy for the district and what the strategic development needs of the district are and then describes how those needs will be distributed through a series of land allocations to identify where development needs will be met and where areas that are of specific economic, environmental or social importance will be protected.

The second is the *Development Management Development Plan Document*, which sets out the planning policies that will be used to determine planning applications.

Scoping Consultation
25 September to 20 November 2020

Since the adoption of the Local Plan, council officers have been working on updating the Local Plan in the context of the Climate Emergency. Informed consultation on the potential scope of the review took place in late 2020 which established the areas of the Local Plan which would be the focus of any update.

Climate Emergency Themes & Evidence Base

Over the early part of 2021 officers have been re-drafting policies that fall within the scope of the review with the objective of improving the outcomes for development in terms of climate change impact and adaptation. The changes have been focused on several key themes which have included:

- Water Management
- Green and Blue Infrastructure
- Heritage
- Transport
- Sustainable Design, Energy Efficiency and Renewable Energy

The Legislation Context

The Planning and Compulsory Purchase Act (2004), as subsequently amended by the Localism Act 2011, provides the legal basis for producing Local Plans in England. The statutory framework governing Local Plan production is contained in the Town and Country Planning Act (Local Planning) (England) Regulations 2012, as amended. Specifically, the two DPD consultations are undertaken in accordance with the following regulations:

- Regulation 18: Preparation of a Local Plan
- Regulation 35: Availability of documents
- Regulation 36: Copies of documents

The National Planning Policy Framework or NPPF sets out the Government's planning policy for England and how this would be applied throughout the planning system. The framework must be taken into account when preparing a Local Plan.

"Council officers have been working on updating the Local Plan in the context of the Climate Emergency."

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Providing City, County & Community

What happens next?

The council will consider the comments made through the consultation. Comments are welcomed from residents, people employed in the district, land owners, developers and infrastructure providers. The council will also need to continue updating the evidence base informing the Local Plan to take account of new information or changing circumstances.

The council will take account of the comments and new evidence, and is likely to publish a revised version of the plan in early 2022. That version will be the one that the council normally publishes. There will be a period of eight weeks when anyone can make comments on the published plan. The published plan, the evidence that informed it, and all the comments that have been received in the eight week period will then be submitted to the government. The government will then appoint an Inspector to conduct an independent examination. The Inspector will consider whether the plan has been properly prepared. To help decide if it has been properly prepared he or she will visit a local hearing and invite people to an oral hearing to explain their views.

The Inspector will then submit a report, usually with recommendations. If the Inspector decides that it has been properly prepared then the council can adopt the Local Plan. Adoption is not expected until summer 2022.

LANCASTER CITY COUNCIL
Providing City, County & Community

People Homes Jobs

Public consultation
Starts Friday 23rd July 2021

Closing date for your comments
17 Sept '21

Climate Emergency Review of the Local Plan for Lancaster District

The Local Plan Review looks at a range of topic areas, from water management and green and blue infrastructure, through to energy efficiency standards, sustainable design and renewable energy generation as well as strategic transport and heritage considerations in the context of climate change. The policies that are included in the Local Plan Review will remain in place through to the early 2030's and be used in the determination of all planning applications received by Lancaster City Council.

Consultation Help Desk

Planning Policy Officers will be available to assist with any queries on the Local Plan Review on the following days and times by calling: 01524 562383

| Monday 26 July 2021 | 2pm to 5pm |
|---------------------------|------------|
| Tuesday 3 August 2021 | 2pm to 5pm |
| Wednesday 11 August 2021 | 2pm to 5pm |
| Thursday 19 August 2021 | 2pm to 5pm |
| Monday 23 August 2021 | 2pm to 5pm |
| Thursday 2 September 2021 | 2pm to 5pm |

Scan this code to find out more about the Local Plan Review

Consultation events will be reviewed following the government announcements throughout the 8 week consultation period. If safe and face to face consultation events occur these will be published on the council webpage and details sent to all those signed up the Planning Policy mailing list.

Contact Us

Visit: www.lancaster.gov.uk/localplan **Have your documents, get it:** www.lancaster.gov.uk/localplan

Email: planningpolicy@lancaster.gov.uk

Write to us: planningpolicy@lancaster.gov.uk **Representations and Planning:** 10 West 1, Green Hall, Quaker Square, Lancaster LA1 1PS

Further information: To receive further updates, please sign up to the planning policy consultation list at www.lancaster.gov.uk/planningpolicyconsultation

Shaping a better future

LANCASTER CITY COUNCIL
Providing City, County & Community

Regulation 18: Climate Emergency Review of the Local Plan Consultation

Consultation documents and material

This included a period of publicity across the Lancaster District, with 500 consultation leaflets and a public notice placed in Lancaster Guardian (a local newspaper) on 29 July 2021. A press releases were also issued in this week. Information on the consultation was published on the council [webpages](#) and a [storyboard](#) produced and a newsletter via emails were sent to 2301 consultees on the Planning Policy consultation database, notifying them of the opportunity to participate in the Regulation 18 consultation, sent 27 July 2021 and a second reminder just before the closing date on 16 September 2021. Copies of the consultation documents were only on request due to COVID restrictions.

An [Engagement Plan](#) was published outlining the timetable and a [consultation leaflet](#) was produced.

Online events engagement events took place over the 8 week period and a Consultation Help Desk set up, (dates on the back page of the [consultation leaflet](#))

Copies of the consultation documents were made available at the 'Principal Offices' on request, due to COVID restrictions.

At the start of this consultation, we launched a number of videos, describing the scoping exercise and a list of suggested policies for changes (also listed in Appendix E), in addition to producing a FAQ and a list of questions for people to respond to.

- ✓ [Introduction to Regulation 18 Consultation Video](#)
- ✓ [Heritage Topic Video](#)
- ✓ [Transport Topic Video](#)
- ✓ [Green & Blue Infrastructure Topic Video](#)
- ✓ [Sustainable Design, Energy Efficiency & Renewable Energy Topic Video](#)
- ✓ [Water Management Topic Video](#)

All the consultation material can be found in the [Document Library](#) (Reference LPR002), view the Regulation 18 consultee responses [here](#).

We held several online engagement events for young people and stakeholders, key dates and stages are described in [Appendix C](#).

Regulation 18: Climate Emergency Review of the Local Plan Consultation

Following the conclusion of the consultation all comments and responses received were analysed and their implications to the council's approach to the review of the two DPD production considered.

Further details on the publicity methods are set out in more detail within [Appendix A](#)

Further details on the publicity material are set out in more detail within [Appendix B](#)

Representations received

The council received formal representations from 44 respondents, raising 544 comments.

- ✓ [Section 5](#) of this statement outlines how the Council engaged in this round of consultation.

Main issues raised:

- ✓ [Section 6](#) outlines what issues were raised
- ✓ [Section 7](#) outlines how these issues have been addressed.

Timetable:

| | |
|---|---|
| Preparation of the D draft Regulation 18 Review of the Local Plan DPDs | Following the close of the scoping consultation November 2020 to March 21 in readiness for the start of regulation 18 consultation |
| 8 week consultation on the draft Regulation 18 Local Plan DPDs | 23 July 2021 to 17 September 2021 |
| Analysing the Consultation Responses | September 2021 to November 2021 |
| Preparation of Consultation Report | September 2021 to November 2021 |

| | |
|---|---------------|
| Regulation 18: Climate Emergency Review of the Local Plan Consultation | |
| Presenting and Publishing the Report | February 2022 |
| | |

Appendix C: Consultation and Engagement Key Dates

It is important that this Consultation Statement is read in conjunction with the Duty to Co-operate Statement of Compliance which sets out the council's approach to engaging with neighbouring authorities.

Proposed Scoping Consultation: 25th September 2020 to 20th November 2020

| Consultation Event | Target Audience | Date |
|---|---|--|
| 8 Week consultation published on the council website, press release, public notice, newsletter to consultees issued | All residents and stakeholders | 25th September 2020 to 20th November 2020 |
| Launch of Local Plan Review with Duty to Co-operate Partners | Duty to Cooperate Partners | 1 October 2020 |
| Climate Emergency and Environment Advisory Group members | Elected Members and key Officers working on Climate Change matters. | 1 October 2020 |
| Monday to Friday question and answers opportunity from 10am to 12.30pm and 3.30pm to 7pm | All residents and stakeholders | 19 October 2020 to 23 October 2020 |
| Young People Event Lancaster & Morecambe College | Young People | 11 November 2020 |
| Water Management Stakeholder Engagement Workshop | Environment Agency, Lead Local Flood Authority and United Utilities | 11 December 2020 |
| Green/Blue Stakeholder Engagement Workshop (1) | Arnsdale and Silverdale AONB, CPRE, Forest of Bowland AONB, Forestry Commission, Lancaster City Council Conservation Team, LUC, Lancaster Civic Society and National Trust | 24 February 2021 |
| Green/Blue Stakeholder Engagement Workshop (2) | Environment Agency, Claver Hill Community Food Growing Project, Green Lancaster, Lancashire County Council, Lancashire LNP, Lancashire Wildlife Trust, Lancaster City Council Public Realm, Lancaster University, Lead Local Flood Authority, Lune Rivers Trust and South Lancaster Flood Action Group, Marine Management Organisation, North Lancashire Food Futures | 25 February 2021 |

| Consultation Event | Target Audience | Date |
|---|---|---------------|
| | Imagination Lancaster, Natural England, Ramblers Association, The Fairfield Association, United Utilities and Woodland Trust | |
| The future of sustainable transport in Lancaster District Stakeholder Engagement Workshop | Various representatives from different teams within Lancashire County Council, Highways England and Lancaster University | 3 March 2021 |
| Developer / Agent Viability Engagement Workshop 165 representatives of developers, registered providers and agents from the planning policy consultee list were invited. The council's viability consultant, Three Dragons, presented their draft assumptions and hosted a discussion. A copy of the presentation was sent to all those who confirmed attendance. Stakeholders were invited to make comments and share viability information and appraisals which would be taken into account when the Viability Assessment assumptions were determined. | Cushman & Wakefield, Eckersley Property incorporating Irvine Taylor, Gladman Developments, Great Places Housing, Highbrook Homes Ltd, Hollins Strategic Land, Home Builders Federation, Homes England, Jigsaw Homes, Lancaster Cohousing, Lune Valley Rural Housing Association, Oakmere Homes, Owen Land & Property, Russell Armer, Savills, South Lakes Housing, Story Homes Ltd, Taylor Wimpey, Trafford Housing Trust, Vmc developments, Wrenman homes, Lancaster University - Students Union Living, Trustee to land at BGV from Galgate towards Lancaster, Calico | 4 March 2021 |
| Development Management Planning Officers Engagement | Lancaster City Council Development Management Planning Officers | 16 March 2021 |
| Canal and Rivers Trust Engagement | Representatives from the Canal and Rivers Trust | 8 April 2021 |
| Lancaster Civic Society Engagement | Members of Lancaster Civic Society | 23 April 2021 |
| Lancaster Green Spaces Engagement | Representatives of Lancaster Green Spaces | 30 April 2021 |
| Lancaster City Council Councillor Members Engagement | Elected council members | 12 May 2021 |

In addition to the stakeholder involvement, Officers in the team also attend the 'Lancashire Climate Change Planning Officers Group'. The first meeting of this took place in November 2020 with a further meeting in Nov 2021 (delays due to covid). The meeting brings together those officers in Lancashire that are working on climate change policies and reviews to share knowledge and ideas and also to hear from experts in specific fields such as the Environment Agency (who attended the first meeting) in relation to flood and Water management.

Regulation 18 Consultation: Climate Emergency Review of the Local Plan: 23 July to 17 September 2021

| Consultation Event | Target Audience | Date |
|---|---|--|
| 8 Week consultation published on the council website, press release, public notice, newsletter to consultees issued | All residents and stakeholders | 23 July 2021 to 17 September 2021 |
| Launch of Local Plan Review with Duty to Co-operate Partners | Duty to Cooperate Partners | 1 October 2020 |
| Lancaster Green Spaces Engagement | Representatives of Lancaster Green Spaces | 30 April 2021 |
| Lancaster City Council Councillor Members Engagement | Elected council members | 12 May 2021 |
| Developer Industry Engagement Event | Invites sent to 275 agents, developers, housebuilders | 27 July 2021 |
| Lancashire Climate Change Planning Officers Group | Planning Policy Officers | 9 th November 2021 |

Lancaster City Council Member & Elected Cabinet Engagements / Briefings

| Member Engagement | Date |
|--|---|
| Local Plan Review Group (scoping consultation details) Local Plan Review Group (updates and engagement) | 10 September 2020 9 December 2020 22 February 2021 22 April 2021 15 June 2021 21 September 2021 8 December 2021 |
| Member briefing – Background & details on scoping consultation Members Engagement Briefing & Updates | 30 September 2020 20 April 2021 12 May 2021 29 November 2021 |

Duty to Cooperate

| Local Authority | Meeting Date |
|---|--------------|
| Barrow Borough Council | 02/06/21 |
| Blackpool Council | 01/07/21 |
| Carven District Council | 24/05/21 |
| Fylde Borough Council | 07/05/21 |
| Ribble Valley Borough Council | 11/05/21 |
| South Lakeland District Council | 07/07/21 |
| Wyre Borough Council | 05/05/21 |
| Yorkshire dales National Park Authority | 25/05/21 |

Appendix D: Sustainability Appraisal (SA) and Habitat Regulations Assessment (HRA) Engagement Process Key Dates

| Meetings and workshops | Dates | Stage |
|---|---------------------------------------|----------------------------|
| Natural England early engagement meeting on the Climate Emergency Review of the Local Plan DPDs | 9 March 2020 | SA Scoping Report |
| Informal consultation with the three SEA statutory bodies | 25 September 2020 to 20 November 2020 | |
| SA Scoping Report (AECOM)– available for consultation during scoping stage. This was subsequently updated following the consultation with final report dated Jan 2021 | | |
| HRA Scoping Report (AECOM) – available at the same time as above | | |
| AECOM SA and HRA responses were incorporated into the Reg 18 Topic Papers and document updated | 23 July 2021 to 17 September 2021 | Draft (Regulation 18 DPDs) |
| AECOM SA and HRA reports finalised to accompany the Publication Regulation 19 consultation | | Draft (Regulation 19 DPDs) |

Appendix E: List of Local Plan Policies which have been considered as part of the review

Date July 2021

LOCAL PLAN POLICIES WHICH HAVE BEEN CONSIDERED AS PART OF THE CLIMATE EMERGENCY LOCAL PLAN REVIEW

The "Local Plan for Lancaster District", adopted on 29th July 2020, is comprised of two separate Development Plan Documents: 1. The Strategic Policies and Land Allocations Development Plan Document and 2: The Development Management Development Plan Document. The first of these documents sets out the objectives of the Local Plan, establishes how much development is required and then describes how and where that development will be achieved by allocating land for development, or protecting land from development. The second document provides the policies that are used to help determine development proposals, setting for example the Council's approach on housing standards and flood risk. Following the Council's declaration of a Climate Emergency in January 2019 the Council has re-visited policies in both documents to see if the performance of the policies in climate change mitigation and climate change adaptation can be improved.

Climate change mitigation is action taken to help **limit** the magnitude or rate of climate change and its related effects. This most often involves actions to reduce the emissions of carbon dioxide and greenhouse gas emissions such as from the burning of fossil fuels, particularly coal, natural gas and fuel oil in home and industrial heating and electricity generation, and the burning of petrol, diesel, liquid petroleum gas and aviation kerosene in personal and industry-related transport. It also includes measures to reduce the concentration of carbon dioxide and greenhouse gases in the atmosphere and sequestration for example through the planting of trees, peatland restoration, blue carbon or carbon capture.

Climate change adaptation is action taken to **adjust** to the negative consequences of climate change. This **might** involve developing policies that apply increased caution about where development should be located, for example, to take account of modelling that shows where flood plains might increase as a consequence of higher rainfall and storm events, or, to increase the ability of buildings and infrastructure to withstand more frequent and more extreme storms. It can also include measures such as increasing shade cover and protecting homes from overheating.

1. Policies of the Strategic Policies and Land Allocations Development Plan Document

| POLICY NUMBER | POLICY TITLE | PURPOSE OF POLICY | PROPOSED CHANGE TO POLICY | HOW DOES THE POLICY ACHIEVE BETTER OUTCOMES FOR CLIMATE CHANGE? |
|---------------|--|---|--|--|
| SP4 | Priorities for Sustainable Economic Growth | The policy sets out a series of priorities for economic growth in the district. | Further reference provided in the policy towards support for a green economic recovery and the promotion of training and skills in relation to the construction of energy efficient homes. | The amendments to this policy allow for the promotion of green jobs, local training opportunities and the greater facilitation of energy efficient buildings. |
| SP8 | Protecting the Natural Environment | The policy sets the strategic approach to protecting the natural environment and provides some specific references to the impacts of Climate Change on the natural environment, particularly in relation to flood risk matters. | Reference to the green and blue infrastructure (GBI) network is now included, and the importance of protecting, maintaining, enhancing, and extending the green and blue spaces, corridors and chains that make up this wider strategic network, highlighting their multifunctionality. The policy also now refers to sea level rise, as a consequence of climate change that can affect our District. | The GBI Strategy has highlighted the benefits green and blue infrastructure can provide for climate change mitigation and adaptation. GBI needs to be considered at a strategic scale, hence the identification of the District-wide network, within which connectivity is key. For example, for improving species ability to move to adapt to changing climates and facilitate more sustainable active travel corridors. GBI can also provide multiple uses, with climate change benefits, within the same space. |
| SP9 | Maintaining Strong and Vibrant Communities | The policy explores the role of spatial planning in achieving greater social inclusion, health and well-being and the promotion of neighbourhood planning. | Promotes the importance of climate resilience in terms of place-making and within communities. Amendments seek to promote the delivery of low carbon development and the delivery of modal shift towards more sustainable forms of transport. | The amendments will raise the importance of climate resilience in terms of communities coping with the effects of Climate Change, for instance extreme temperatures or flood risk. It seeks to promote development which is resilient to such impacts. Amendments also seek to promote cycling, walking and public transport as more sustainable methods of making local trips. |
| SP10 | Improving Transport Connectivity | This policy acknowledges the Highways and Transport Masterplan for Lancaster District prepared by Lancashire County Council in its role as highways and transport authority. The policy supports the infrastructure improvements required to address both current issues and future growth aspirations. | The policy encourages modal shift and a focus on reducing carbon emissions. | Modal shift will result in lower carbon emissions thereby mitigating the effects of climate change. |

| POLICY NUMBER | POLICY TITLE | PURPOSE OF POLICY | PROPOSED CHANGE TO POLICY | HOW DOES THE POLICY ACHIEVE BETTER OUTCOMES FOR CLIMATE CHANGE? |
|---------------|--|---|--|---|
| SG4 | Lancaster City Centre | The policy describes the role of the Town Centre Strategy and the role of car parking in Lancaster city centre. The policy sets a strategic approach to regeneration across Lancaster City Centre and states that development proposals in Lancaster City Centre will be expected to support and contribute to the effective delivery of the Movement Strategy. | Amendments seek to promote the strengthening of Green / Blue infrastructure networks in the City Centre and promote sustainable forms of travel to access the City Centre. | The policy highlights the importance of Green / Blue Infrastructure networks and modal shift – consistent with wider policy direction. |
| SG12 | Port of Heysham and Future Expansion Opportunities | This policy applies to the Port of Heysham and its operations with port-operating land. The policy supports the Port as a key economic driver within the district. | Clarity has been added to make clear that future proposals will need to have fully considered the Council's commitment to addressing climate change. | Activities at the port are very dependent on goods being moved by HGVs and therefore additional consideration of climate change issues for any proposals at the port will ensure climate change mitigation is adequately considered. |
| SG13 | Heysham Gateway, South Heysham | This policy describes the Council's intention to deliver a much-improved employment area on land that includes the site of former petrochemical and fertiliser manufacturing facilities. The Council intends to prepare a further document to describe a vision for this area in greater detail. | Policy amendment seeks to promote the delivery of low-carbon and green energy sectors in the Heysham Gateway area. | The policy widens the scope to support green / low-carbon energy proposals in this area. |
| EN9 | Air Quality Management Areas | This policy applies to the designated Air Quality Management Areas (AQMAS) in Lancaster City Centre, Carnforth Town Centre and Galgate. | The adopted 'sound' Local Plan policy remains unchanged. | The policy is already operating well and already contributing to climate change mitigation. |
| SC4 | Green Space Networks | This policy identifies greenspace networks including Morecambe and Heysham Promenades, Lancaster city Centre, the River Lune Corridor, and Lancaster Canal. The policy aims to protect these valued ecological and recreational networks from development which would cause damage their integrity. | <p>The GBI Strategy identifies a District-wide network and so it's more appropriate to refer to those key/strategic GBI assets identified in this policy as 'corridors' and 'chains', which help to make up the wider network.</p> <p>The GBI Strategy also highlighted the importance of incorporating blue infrastructure, as well as green, so key/strategic blue corridors and chains have now been included. The policy now also emphasises the multifunctional value of these assets and the contribution they can make towards climate change mitigation/adaptation.</p> <p>Policy SC4 is now called 'Green and Blue Corridors and Chains'.</p> | The policy identifies, and subsequently protects and seeks the improvement of, the key/strategic blue/green corridors and chains which are fundamental to the wider GBI network. Located in areas that are under greatest pressure from development, thus pressure upon the GBI network in these areas is greatest, and to effectively address climate change impacts the GBI network needs to be as resilient as possible. |
| SC5 | Recreation Opportunity Areas | This policy states that through future development proposals the Council will investigate the potential to provide significant new or improved open space in areas where there is a deficiency in open spaces. | The policy has been amended so that the requirement is not to solely focus on recreation but to consider multi-functional benefits of GBI. Policy now has direct link to requirements of policy DM43. | The multifunctional nature of GBI means that such assets can provide multiple benefits, particularly in terms of climate change mitigation and adaptation, so this policy seeks to go beyond purely focussing upon recreational benefits. Other benefits include ecological, active travel and water management. |
| T1 | Lancaster Park and Ride | This policy identifies two sites that will be protected for the purposes of Park and Ride; land at M6 junction 34 and land at M6 junction 33 that will be safeguarded for future investigation for the role as a Lancaster South Park and Ride - subject to demand for such a facility. The policy is consistent with the County Council's Highways and Transport Masterplan. | No amendments are proposed as this policy is already working well in that it promotes sustainable forms of transport. | Sustainable forms of transport facilitate Climate Change mitigation, by seeking to reduce the need for private car travel and identifying opportunities for increasing modal shift and the promotion of public transport to access Central Lancaster. |

| POLICY NUMBER | POLICY TITLE | PURPOSE OF POLICY | PROPOSED CHANGE TO POLICY | HOW DOES THE POLICY ACHIEVE BETTER OUTCOMES FOR CLIMATE CHANGE? |
|---------------|-----------------------------|--|---|---|
| T2 | Cycling and Walking Network | This policy identifies and further promotes actions to enhance the district's cycling network. It identifies both existing cycle routes and aspirational cycling routes. The policy also links to the aspirations for greater levels of cycling in the Highways and Transport Masterplan prepared by the County Council. | <p>Amendments to this policy appear minor but do strengthen the approach considerably. The policy no longer aims to 'encourage' or 'seek to support' cycling and walking but will now prioritise this.</p> <p>The shift in the policy title is also clear that Lancashire County Council aim to continue to develop this network. The additional updated mapping (since Local Plan adoption) is also a clear example that the shift to active travel is a dominant feature of the Local Plan.</p> | Modal shift and the prioritisation of walking and cycling will mitigate the effects of climate change in terms of greenhouse gas emissions. |
| T4 | Public Transport Corridors | This policy identifies several key public transport corridors where more frequent and regular public transport services will be promoted. The policy promotes enhanced public transport corridors that are consistent with the Lancaster District Highways and Transport Masterplan. | This policy now requires that developers ensure the provision of new services or enhance existing services and demands that public transport services should be within reasonable safe walking and cycling travel distance of all parts of the development, thus increasing the prominence and availability of public transport modes. | Greater access to and provision of public transport services will reduce greenhouse gas emissions by diminishing private car use which directly supports climate change mitigation. |

2. Policies of the Development Management Development Plan Document

| POLICY NUMBER | POLICY TITLE | POLICY DESCRIPTION | PROPOSED CHANGE TO POLICY | HOW DOES THE POLICY ACHIEVE BETTER OUTCOMES FOR CLIMATE CHANGE? |
|---------------|--|---|---|--|
| DM2 | Housing Standards | This policy looks at adaptability and indoor space standards and seeks a proportion of new development to achieve these standards, varying depending on the specific development proposed. | No changes are proposed to the content this policy but the title has been amended to 'Space and Accessibility Standards.' Minor changes to the supporting text reflect that the District does now need to be aware of water stress and water efficiency. | Climate change adaptation will take place via the minor changes to the supporting text in relation to the need to be aware of water stress and water efficiency. |
| DM3 | The Delivery of Affordable Housing | The policy sets out the affordable housing requirements for new development. | <p>The policy and supporting text have been amended to clarify that First Homes will form part of the affordable homes for sale provision. The revised provision will be as follows:</p> <ul style="list-style-type: none"> • 25% First Homes; • 25% Shared Ownership; • 50% affordable rent / social rent. <p>The overall percentage of affordable homes required by the policy has not been changed.</p> | N/A – change is a point of clarification added to the plan for completeness. |
| DM27 | Open Space, Sports and Recreational Facilities | The adopted Local Plan policy sets out the presumption towards the protection of public open spaces. The policy also links to the need for new open spaces within new residential development and the enhancement of existing spaces. | The GBI Strategy highlighted the multifunctional benefits that green spaces can provide, particularly in terms of their climate change mitigation and adaptation value. Appendix D has also been updated to reflect the findings of the KKP Open Space work that underpins the current adopted Local Plan. | When assessing the loss of an open space, consideration should also be given to the climate mitigation and adaptation value that the space provides, to ensure any such benefits are not lost. |

| POLICY NUMBER | POLICY TITLE | POLICY DESCRIPTION | PROPOSED CHANGE TO POLICY | HOW DOES THE POLICY ACHIEVE BETTER OUTCOMES FOR CLIMATE CHANGE? |
|---------------|-----------------------|---|---|---|
| DM29 | Key Design Principles | The policy sets out a series of key design principles which new development proposals (of any scale and in any location) should consider. These are subsequently considered in making decisions on planning applications. | <p>There are multiple amendments to this policy.</p> <ul style="list-style-type: none"> • Buildings will now be expected to maximise natural light and make use of renewable energy. • Requirements for the consideration of reusing and recycling materials. • Requirement for the consideration of including green and blue infrastructure. • Provision of growing space in new developments to support the local growing of food must be included in developments. • The inclusion of habitat creation for protected species has been expanded as a key development component • Adequate space for on-site composting is now required | <ul style="list-style-type: none"> • Buildings will now maximise natural light and solar gain for energy efficiency mitigating the effects of climate change • Reusing and recycling materials takes account of embodied carbon, and reduces the demand for materials, which consequently reduces land degradation and emissions. • Climate Change mitigation is achieved by including green and blue infrastructure, as they also absorb carbon, and improve air quality. They can contribute to climate adaptation through providing cooler local areas and improved flooding resilience. • Transport and agricultural input associated emissions will be reduced by including growing space in new developments. • Expanding the inclusion of habitat creation for protected species supports both an adaptation and mitigation response to the climate emergency, supports local resilience and provides for mitigation of the intrinsically intertwined ecological crisis. • The requirement for adequate space for on-site composting recognises the circular nature of the food system as well as its contribution to greenhouse gas emissions and helps mitigate waste associated emissions aiding in climate mitigation. |
| DM30 | Sustainable Design | The policy seeks to support the role of sustainable design and construction methods within new development. | <p>DM30 has now been split into three policies—Policy DM30a: Sustainable Design and Construction-New Development, Policy DM30b: Sustainable Design and Construction-Water Efficiency, and Policy DM30c: Sustainable Design and Construction-Materials, Waste & Construction.</p> <ul style="list-style-type: none"> • Energy and design: The policy requires developments to be designed to minimise energy and water consumption and maximise energy and water efficiency. The importance for low carbon and renewable energy generation and distribution is also included. It also highlights the importance of buildings that can be retrofitted throughout their lifetime and are designed for renewables. It places new requirements for commercial buildings to meet BREEAM 'Excellent'. • Water efficiency: All residential developments must now achieve, as a minimum, the optional requirement set through the Building Regulations Requirement G2: Water Efficiency or any future updates to the requirement. All major non-residential development should incorporate water conservation measures so that predicted per capita consumption does not exceed the appropriate levels set out in the applicable BREEAM 'Excellent' standard. The design of new developments should consider the inclusion of water efficiency and consumption measures, such as rainwater recycling, green roofs, and water butts in the construction of new buildings. • Construction process: This key area focuses future development on using materials that have lower embodied carbon and reduced construction and transportation associated emissions. Where possible, local suppliers should be used and modern methods of construction. • Materials and waste: The full lifecycle of the building should be considered from concept to demolition and considers designing for lifecycles of the building for adaptability and retrofitability. It aims to reduce the amount of waste produced and support the reuse and recycle of waste and includes the ways in which green walls and roofs can be incorporated and the importance of designing buildings with structures to | <p>This policy has been significantly amended to truly put climate change considerations at the heart of new development in the District:</p> <ul style="list-style-type: none"> • The changes in relation to energy and design will contribute to a lowering of emissions for climate mitigation as well as support for energy systems that are resilient to climate change. • Water efficiency: These changes will help the District adapt to a warmer and less water secure future climate as well as recognise the importance of water conservation to address demands on water supply though increased population. • Construction process: Using materials that have lower embodied carbon and reduced construction and transportation associated emissions mitigates the effects of climate change. • Materials and waste: Considering the amount of waste produced and supporting the reuse and recycle of waste decreases the amount of waste associated emissions. The measures also address embodied carbon of buildings. Providing water management, energy efficiency and conservation, and space for biodiversity aids climate adaptation and resilience. |

| POLICY NUMBER | POLICY TITLE | POLICY DESCRIPTION | PROPOSED CHANGE TO POLICY | HOW DOES THE POLICY ACHIEVE BETTER OUTCOMES FOR CLIMATE CHANGE? |
|---------------|--|---|--|--|
| | | | <p>accommodate inbuilt green infrastructure. Developments should provide water management energy efficiency and conservation, and space for biodiversity.</p> <p>•Sustainable Design Statement: The policy now requires new developments to evidence their compliance with the sustainable design policies in a Sustainable Design Statement to be submitted at planning application stage.</p> | |
| DM31 | Air Quality Management and Pollution | The policy sets a general approach to air quality matters which seeks to minimise emissions. The Policy also sets an approach to developments located within designated Air Quality Management Areas (AQMA's) | This adopted 'sound' Local Plan policy remains unchanged as it is operating well. The supporting text has been slightly amended to set out a series of measures that can be put in place to help mitigate air quality impacts, and also to set out the expectation to consider the impacts of development upon levels of particulate matter as well as nitrogen dioxide. | The adopted Local Plan policy is already contributing to climate change mitigation. Putting measures in place to mitigate the impacts upon air quality also helps to mitigate the impacts of climate change. |
| DM33 | Development and Flood Risk | The policy seeks to address the issues associated with flooding and flood risk in new development in accordance with national planning policy. | DM33 and the supporting text have been amended to ensure that where the flood risk for allocated sites has changed, an exception test is carried out to ensure development is safe and opportunities to provide wider sustainability benefits are taken. Resilience and adaption measures are incorporated, as well as measures to reduce flooding and measures to improve watercourses and use natural flood risk management techniques. | Using natural flood risk management techniques and improving watercourses ensures climate change adaptation. |
| DM34 | Surface Water Run-Off and Sustainable Drainage | The policy seeks to provide a generic approach towards the role of sustainable drainage within new development to minimise water run-off and provide effective water management on-site via SuDS. | <p>This policy has been significantly amended to secure better outcomes in relation to flooding. A new Sustainable Drainage Hierarchy has been introduced which prioritises the reuse of water and infiltration together with above ground features which provide multi-functional benefits.</p> <p>The amended policy includes requirements for the design of Sustainable Drainage Systems, minimum run-off rates and a list of requirements for submission with an application to improve the information available when determining the acceptability of schemes.</p> | The inclusions of the Sustainable Drainage Hierarchy and design requirements ensures climate change adaptation is central. |
| DM35 | Water Supply and Wastewater | The policy identifies the importance of ensuring that new development has adequate and appropriate connections to a water supply and wastewater network. | Minor changes have been included to clarify the need for developers to demonstrate adequate water supply and wastewater capacity. The requirement for water efficiency in non-residential buildings has been moved to Policy DM30b: Sustainable Design and Construction – Water Efficiency. | Tackling water supply and wastewater capacity considerations now are important to ensuring the district adapts to the changing climate. |
| DM36 | Protecting Water Resources and Infrastructure | This policy highlights the importance of protecting water resources and infrastructure which is critical to maintaining an effective water supply and wastewater network. | The policy now requires development to include multi-level source control to prevent ground and water pollution, to protect and where possible, improve water quality and to clarify support for infrastructure investment. | Tackling pollution and water quality considerations now are important to ensuring the district adapts to the changing climate. |
| DM43 | Green Infrastructure | The policy sets out an approach towards the protection and improvement of Green Infrastructure within the district. | <p>The GRI Strategy highlighted the important role that GRI assets can play in climate change adaptation and mitigation. Therefore, the policy now emphasises the importance of the connectivity of GRI assets, and their role within the wider GRI network which has now been identified.</p> <p>The policy sets out the multifunctional value of GRI and the six key uses that should be considered when designing GRI and how climate change benefits run through each of these. The policy now also requires a GRI Management and Maintenance Plan to be submitted to ensure such assets and their long-term benefits are secured and maintained.</p> <p>DM43 is now called 'Green and Blue Infrastructure'.</p> | Greater emphasis has been placed on the role and benefits green and blue infrastructure can provide in terms of climate change adaptation and mitigation, and how one space can provide more than one use. The request for a Management and Maintenance Plan then ensures these are secured for the long term. |

| POLICY NUMBER | POLICY TITLE | POLICY DESCRIPTION | PROPOSED CHANGE TO POLICY | HOW DOES THE POLICY ACHIEVE BETTER OUTCOMES FOR CLIMATE CHANGE? |
|---------------|--|--|--|--|
| DM45 | Protection of Trees, Hedgerows and Woodland | The policy sets out an approach which supports the protection and retention of valuable trees, hedges and woodland. It also sets a policy position in relation to the increase of tree coverage. | The policy position has changed from encouraging tree and hedgerow planting to expecting it. The policy now also highlights their climate change mitigation and adaptation value. | Greater tree and hedgerow coverage play an important role in how the District mitigates and adapts to the impacts of climate change. |
| DM53 | Renewable and Low Carbon Energy Generation | The policy seeks to identify and support opportunities for renewable sources of energy generation within the district in the context of national planning policy. | <p>This policy has been significantly amended. The existing policy has been strengthened to explicitly state support in principle for renewables and has been expanded to include more renewable and low carbon energy options as well as distribution networks.</p> <p>There is now a specific policy requirement in relation to several renewable technologies, covering both energy generation and energy distribution networks. This has moved the policy from focusing purely on wind energy generation to also now considering hydro, solar and six additional potential technologies (with acknowledgement that the industry is growing) as well consideration for heating and cooling networks. The implementation of this policy will allow for these technologies to be utilised more easily within schemes.</p> <p>The policy now aims to ensure that energy is locally available from low carbon and renewable sources (ahead of grid decarbonisation). There is now an aim to support the green recovery and the creation and continuation of green jobs.</p> | The urgency of the need to act on the climate emergency is picked up through the inclusion of specific renewable technologies within this policy. In addition to aiding in climate mitigation through emissions reductions, the policy supports the transition to renewable and low carbon energy, which supports reduced energy vulnerability and increased resilience to climate change impacts. The existing policy is strengthened to explicitly state support in principle for renewables and expanded to include more renewable and low carbon energy options as well as distribution networks. The key outputs of the policy ensure that the impacts of climate changes are adapted to and mitigated. |
| DM57 | Health and Well-Being | The policy sets out a generic approach towards health and well-being looking at various aspects of development which can impact on people's /communities quality of life and health. | Promotes the importance of climate resilience in terms of place-making within communities. Amendments seek to promote the delivery of low carbon development and the delivery of modal shift towards more sustainable forms of transport. | The amendments will raise the importance of climate resilience in terms of communities coping with the effects of Climate Change, for instance extreme temperatures or flood risk. It seeks to promote development which is resilient to such impacts. Amendments also seek to promote cycling, walking and public transport as more sustainable methods of making local trips. |
| DM58 | Infrastructure Delivery and Funding | The policy sets out a position on the funding of new infrastructure through planning obligations and the investigation of implementing a Community Infrastructure Levy (CIL). | Amendments have been made to clarify the Council's position in terms of infrastructure delivery and affirm the commitments relating to the preparation of a Viability Protocol SPD. | The amendments clarify the importance of infrastructure delivery as a means of addressing some of the Council's Climate agenda, for instance the promotion of low-carbon development and modal shift. |
| DM59 | Telecommunications and Broadband Improvements | The policy seeks to promote the increased role of the telecommunications and broadband in everyday lives and encourages improvements to the network through new development. | Amendments made to support the delivery of the Council's Digital Strategy and ensure better connectivity within new development. Policy seeks to support upgrades to broadband connectivity / digital signal within both urban and rural locations. | The amendments seek to support better digital inclusion across the district, improve opportunities for home working and a reduction in trips, contributing towards climate change mitigation. |
| DM60 | Enhancing Accessibility and Transport Linkages | The policy seeks to promote modal shift and sustainable forms of transport rather than prioritising the private car. The policy also looks at land-use patterns to ensure that sustainable locations are chosen for development with high footfall. | The policy wording has been strengthened so will no longer 'seek' to ensure but will instead now 'ensure' that policy requirements are met. | The policy considers climate change by achieving sustainable travel patterns, thereby mitigating the impacts of climate change. |
| DM61 | Walking and Cycling | The policy seeks to promote the role of cycling and walking to make local journeys and contribute to the agenda of modal shift. The policy seeks to encourage expansion of the network and other associated infrastructure that would promote a greater role for cycling and walking | <p>Policy changes now mean that walking and cycling are clearly prioritised ensuring that active travel is given appropriate attention and the pedestrian environment will be improved, thereby increasing the appeal of walking (and cycling as well as adaptive mobility) as an alternative to the private car.</p> <p>Development proposals must now be in accordance with Local Transport Note 1/20 which is a significant change and will ensure development is designed with walking and cycling at the forefront instead of the private car.</p> | This policy supports a reduction in transport related emissions and thereby contributes to District wide emissions reduction targets and climate mitigation. |

| POLICY NUMBER | POLICY TITLE | POLICY DESCRIPTION | PROPOSED CHANGE TO POLICY | HOW DOES THE POLICY ACHIEVE BETTER OUTCOMES FOR CLIMATE CHANGE? |
|---------------|--|---|---|---|
| DM62 | Vehicle Parking provision | The policy sets out parking standards for vehicular parking but also includes parking for cycles in new development. The levels of provision are set out in Appendix E of the DPD. | Cycle parking standards set out in Appendix E of DPD have been amended to reflect the latest Government guidance and now also include the addition of mobility scooter spaces and non-standard cycles. The use of electric vehicles through the installation of charging points is encouraged. Whilst the existing policy did work towards this, the strengthened wording will ensure better outcomes in relation to tackling climate change. | Promoting modal shift increases the appeal of alternative transport modes to the private car which will inevitably have an impact on reducing greenhouse gas emissions, contributing to the mitigation of climate change. |
| DM63 | Transport Efficiency and Travel Plans | The policy seeks to promote a strategic approach to travel movements within large development through the promotion of travel plans. | The amendments to this policy, whilst appearing to be minimal, are important in encouraging modal shift and reducing carbon emissions. | Modal shift will result in lower carbon emissions thereby mitigating the effects of climate change. |
| DM64 | Lancaster District Highways and Transport Masterplan | The policy sets out the key approaches taken in the Lancaster District Transport and Highways Masterplan (prepared by Lancashire County Council) and ties them to the growth proposed through the Local Plan. | There are no amendments made to this adopted 'sound' policy. | The adopted Local Plan is already contributing to climate change mitigation in this area. |

Proposed new policies

The table below sets out the additional new policies that are proposed to be included in the CELPR. These are policies that have not previously been included in the adopted local plan.

| POLICY NUMBER | POLICY TITLE | PURPOSE OF POLICY | PROPOSED CHANGE TO POLICY | HOW DOES THE POLICY ACHIEVE BETTER OUTCOMES FOR CLIMATE CHANGE? |
|---------------|---|---|---|---|
| CC1 | Responding to Climate Change and Creating Environmental Sustainability | This policy is an overarching strategic policy focused on tackling climate change in the Lancaster District and should be at the heart of all decisions. It sets out how Lancaster will become a low carbon, water sensitive district with a thriving economy, where development is considerate of its natural, historic and cultural assets, through taking a holistic approach to sustainable development, which will protect and preserve the District for generations to come. The policy sets out 6 bullet points on how the plan review can help to support the Council ambitions of becoming net zero by 2030. | N/A- policy not previously included in the adopted Local Plan | A central policy such as this means that all planning decisions should take account of the principles in this policy and will therefore mean that all development proposals adequately adapt to and mitigate the impacts of climate change. |
| DMCCH1 | Retrofit of buildings of traditional construction for energy efficiency | The policy ensures responsible retrofit. This means considering how fabric measures such as insulation, draught proofing, glazing and rainwater protection; services such as ventilation, heating and renewable energy; and occupant behaviours interact with one another, and what effect they have both individually and cumulatively. | N/A- policy not previously included in the adopted Local Plan | The policy enables adaptation and mitigation measures to be introduced to traditional buildings which will result in improved thermal efficiency and reduce household energy usage, whilst reducing the risk of harm associated with these measures. The policy encourages a 'Whole Building' approach, which will result in outcomes which are sustainable in the long term. |
| DMCCH2 | Micro-renewables in the setting of heritage assets | This policy supports DM39 in dealing with the specific challenges posed by the installation of micro-renewable systems in the setting of a heritage asset. The policy aims to avoid harm (or mitigate the harm) to the heritage asset in relation to micro-renewables. | N/A- policy not previously included in the adopted Local Plan | The policy provides for instances where micro-renewable systems cannot be accommodated directly on a heritage asset without resulting in a high level of harm and would therefore conflict with existing local and national policy and legislation. The policy provides guidance which would enable renewable energy generation on a household scale while minimising the associated risks to heritage value. |

Appendix F: Analysis of Regulation 18 outcomes

| Topic | Number of respondents highlighting topic | Number of respondents supportive of policy changes regarding the topic | Number of respondents object to policy changes regarding the topic | Number of general comments regarding the topic | Total number of comments, including general, supporting or objecting comments, regarding policy changes in the topic | Type of Respondent (number): | |
|--|--|--|--|--|--|----------------------------------|---|
| Green and Blue Infrastructure Strategy | 17 | 8 | 2 | 99 | 124 | Developer | 3 |
| | | | | | | Resident | 4 |
| | | | | | | Government/National Organisation | 4 |
| | | | | | | Local Group | 6 |
| Green and Blue Infrastructure | 16 | 3 | 0 | 19 | 22 | Developer | 6 |
| | | | | | | Resident | 2 |
| | | | | | | Government/National Organisation | 3 |
| | | | | | | Business | 1 |
| | | | | | | Local Group | 3 |
| | | | | | | Education Facility | 1 |
| Energy Efficiency | 17 | 3 | 5 | 20 | 28 | Developer | 1 |
| | | | | | | | 0 |
| | | | | | | Resident | 3 |
| | | | | | | Government/National Organisation | 1 |
| | | | | | | Local Group | 2 |
| Miscellaneous | 16 | 3 | 1 | 19 | 25 | Education Facility | 1 |
| | | | | | | Developer | 5 |
| | | | | | | Resident | 5 |
| | | | | | | Government/National Organisation | 2 |
| | | | | | | Business | 2 |
| CIL | 14 | 7 | 2 | 8 | 17 | Local Group | 2 |
| | | | | | | Developer | 4 |
| | | | | | | Resident | 5 |
| | | | | | | Government/National Organisation | 2 |
| | | | | | | Local government | 1 |
| Climate change mitigation and adaptation (CC1 and overall aims/objectives) | 14 | 10 | 1 | 13 | 24 | Local Group | 2 |
| | | | | | | Education Facility | 1 |
| | | | | | | Developer | 4 |
| | | | | | | Resident | 2 |
| | | | | | | Government/National Organisation | 3 |
| | | | | | | Local government | 1 |
| Sustainable design/ construction | 12 | 4 | 1 | 20 | 26 | Business | 1 |
| | | | | | | Local Group | 2 |
| | | | | | | Education Facility | 1 |
| | | | | | | Developer | 4 |
| | | | | | | Resident | 2 |
| | | | | | | Government/National Organisation | 1 |
| | | | | | | Business | 1 |
| | | | | | | Local Group | 3 |
| | | | | | | Education Facility | 1 |
| | | | | | | | |

| | | | | | | |
|---------------------------------|----|---|----|-----|----|----------------------------------|
| Viability Assessment | 13 | 0 | 12 | N/A | 84 | Developer |
| | | | | | | Business |
| Sustainable Drainage Systems | 11 | 1 | 3 | 15 | 19 | Developer |
| | | | | | | Resident |
| | | | | | | Business |
| | | | | | | Local Group |
| Flood risk | 10 | 3 | 1 | 14 | 18 | Developer |
| | | | | | | Resident |
| | | | | | | Government/National Organisation |
| | | | | | | Business |
| | | | | | | Local Group |
| Ecology | 10 | 2 | 0 | 12 | 14 | Developer |
| | | | | | | Resident |
| | | | | | | Government/National Organisation |
| | | | | | | Local Group |
| | | | | | | Education Facility |
| Sustainable transport | 10 | 2 | 2 | 14 | 18 | Developer |
| | | | | | | Resident |
| | | | | | | Government/National Organisation |
| | | | | | | Local Group |
| | | | | | | Education Facility |
| Water efficiency | 9 | 3 | 2 | 4 | 9 | Education Facility |
| | | | | | | Government/National Organisation |
| | | | | | | Business |
| | | | | | | Local Group |
| | | | | | | Education Facility |
| Electric Vehicle Infrastructure | 9 | 0 | 1 | 10 | 11 | Developer |
| | | | | | | Resident |
| | | | | | | Government/National Organisation |
| | | | | | | Business |
| | | | | | | Local Group |
| Economy | 7 | 1 | 1 | 10 | 14 | Developer |
| | | | | | | Resident |
| | | | | | | Local Group |
| | | | | | | Education Facility |
| Community | 7 | 3 | 0 | 5 | 8 | Developer |
| | | | | | | Resident |
| | | | | | | Government/National Organisation |

| | | | | | | | |
|---|---|---|---|---|---|----------------------------------|---|
| Open space and recreation | 6 | 0 | 1 | 8 | 9 | Developer | 3 |
| | | | | | | Government/National Organisation | 1 |
| | | | | | | Local Group | 2 |
| Renewable energy | 5 | 1 | 1 | 4 | 6 | Resident | 2 |
| | | | | | | Government/National Organisation | 1 |
| | | | | | | Local Group | 1 |
| | | | | | | Education Facility | 1 |
| Active Travel | 5 | 2 | 0 | 5 | 7 | Developer | 3 |
| | | | | | | Resident | 1 |
| | | | | | | Local Group | 1 |
| Health and wellbeing | 5 | 1 | 1 | 3 | 5 | Developer | 2 |
| | | | | | | Resident | 1 |
| | | | | | | Local Group | 2 |
| Affordable housing | 5 | 0 | 0 | 5 | 5 | Developer | 3 |
| | | | | | | Resident | 1 |
| | | | | | | Government/National Organisation | 1 |
| Water supply, quality, infrastructure, and wastewater | 4 | 1 | 0 | 6 | 8 | Developer | 2 |
| | | | | | | Business | 1 |
| | | | | | | Local Group | 1 |
| Infrastructure | 4 | 0 | 0 | 5 | 5 | Developer | 2 |
| | | | | | | Resident | 1 |
| | | | | | | Local Group | 1 |
| Land allocations | 4 | 1 | 0 | 3 | 4 | Developer | 1 |
| | | | | | | Business | 1 |
| | | | | | | Local Group | 2 |
| Trees and woodland | 3 | 0 | 1 | 2 | 3 | Developer | 2 |
| | | | | | | Local Group | 1 |
| Strategic objectives | 3 | 2 | 0 | 1 | 5 | Developer | 1 |
| | | | | | | Government/National Organisation | 1 |
| | | | | | | Local Group | 1 |
| Heritage | 2 | 0 | 0 | 3 | 3 | Resident | 1 |
| | | | | | | Local Group | 1 |
| Air quality | 2 | 0 | 0 | 5 | 5 | Developer | 1 |
| | | | | | | Local Group | 1 |

Appendix G: Table of changes between Regulation 18 and Regulation 19

See tables below

Appendix H: Summary of Consultee Response

Responses follow Appendix G

APPENDIX G

Table of changes made between Regulation 18 and Regulation 19 CELPR

Green font and ~~green strikethrough~~ represents changes for regulation 19 version of the CLEPR (made after Regulation 18 version)

~~Red strikethrough~~ and blue font represent those changes made to the July 2020 adopted Local Plan and we made for the Regulation version of the CELPR.

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|--|---|---------------------------------|---|---|--|---|
| <p>Add in following (or similar) text:</p> <p><i>The NPPF was first published on 27 March 2012 and updated on 24 July 2018, 19 February 2019 and 20 July 2021. This report relies upon the 2021 version of the NPPF. Therefore, all subsequent references to the NPPF in this report are references to the 2021 version, where previous versions of the NPPF are referred to this will be made clear.</i></p> | Part 1 at end of sentence at para 1.9 | DN | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | YES | 1 |
| <p>Amend to read</p> <p>The introduction of the Localism Act in 2011 placed the responsibility of ‘Duty to Co-operate’ on local authorities, where planning issues cross-administrative boundaries they must jointly address areas of common interest. This requirement is reinforced by paragraph 178 – 181 24 – 27 of the 201221 National Planning Policy Framework. Lancaster City Council has worked closely with neighbouring authorities, Lancashire County Council and other bodies, such as utility providers, to help prepare a Local Plan that ensures that any local or cross-boundary impacts have been fully considered.</p> | Part 1 – para 1.13 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | YES | 2 |
| <p>Amend to read</p> <p>A Sustainability Appraisal (SA) has been was prepared alongside this the adopted Local Plan DPD by independent consultants Arcadis. As part of this Climate Emergency Local Plan review, an update-addendum will be produced to support the review has been prepared. This is being has been prepared by independent consultations AECOM and has informed the preparation of the Regulation 19 document. The Scoping Stage of this was the appraisal was consulted on as part of the Council’s initial Scoping consultation in September-November 2020. Further SA work has been was undertaken to inform this consultation and is contained in the supporting Topic Papers the Regulation 18 consultation in July – September 2021. This work is contained in the supporting Topic Papers. The SA addendum which will be prepared to support the published plan at regulation 19 stage explains the methodology by which the evolving strategy and policies in the DPD have been subjected to sustainability appraisal form the outset and describes how the work relates to the existing SA of the Local Plan. It will demonstrate demonstrates how the appraisal has informed the selection of key sites in order to promote promotion of sustainable development in the district, with a specific focus on climate change matters. It fulfils the SA and SEA requirements as set out above. The SA addendum, which will be prepared to support the published plan at Regulation 19 stage, will explain the methodology</p> | Part 1 – para 1.20 | RR | To update to reflect current circumstances. | N/A – editorial change for clarification purposes | YES | 3 |

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|--|---|---------------------------------|---|---|--|---|
| Delete paragraph 1.22 | Part 1 – para 2.2 | RR | To update to reflect current circumstances. | N/A – editorial change for clarification purposes | yes | 4 |
| <p>Delete para 1.23 and replace text as follows:</p> <p>Under Article 6 of the Habitats Directive (and Regulation 102 of the Habitats Regulations) an assessment is required where a land use plan may give rise to significant effects upon a Natura 2000 site (also known as International Sites). These include Special Areas of Conservation (SAC), Special Protection Areas (SPAs) and Ramsar sites.</p> <p>Habitats and species of international nature conservation importance have historically been protected by the European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna (The Habitats Directive). This was transposed into British law via the Conservation of Habitats and Species regulations 2017. Following the UK’s withdrawal from Europe a number of amendments have been made to the Conservation of Habitats and Species Regulations (2017) to ensure that they remain operable post January 2021. Most of these changes involve transferring functions from the European Commission to the appropriate authorities in England and Wales.</p> <p>The amended regulations continue to identify a national site network comprising protected sites previously identified as part of the EU’s Natura 2000 ecological network. The national site network includes Special Areas of Conservation (SACs), and Special Protection Areas (SPAs). Ramsar sites whilst not included as part of the national site network remain protected in the same way as SACs and SPAs. Government policy statements have been issued making clear that they should be afforded the same level of protection afforded to SPAs and SACs.</p> <p>Under the Regulations, an assessment is required where a plan or project may give rise to significant effects upon a protected sites.</p> | Part 1 para 1.23 | RR | To ensure compliance with amended regulations. | N/A – editorial change for clarification purposes | yes | 5 |
| <p>Amend para 1.27 to read</p> <p>A full Habitats Regulation Assessment Report incorporating the initial screening exercise and Appropriate Assessment is available alongside the adopted Local Plan via the Council website. As part of the Climate Emergency Local Plan review, an addendum to the HRA is being produced has been produced by independent consultants AECOM. A report detailing the initial screening of the Local Plan review has been prepared to support this consultation, and the assessment has also been incorporated into the supporting topic papers.</p> | Part 1 – para 1.27 | RR | To update to reflect current circumstances. | N/A – editorial change for clarification purposes | YES | 6 |
| <p>Amend policy to read</p> <p>Where there are no policies relevant development plan policies to the application, or relevant policies which are most important for determining the application are out-of-date (footnote 8 of the Framework) at the time of making the decision, then the Council will grant planning permission unless material considerations indicate otherwise, taking into account whether:</p> | Part 1 Policy SP1 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | YES | 7 |

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|--|---|---------------------------------|---|---|--|---|
| <ul style="list-style-type: none"> Any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the guidance in the National Planning Policy Framework taken as a whole; or Specific policies in that Framework [the Framework] indicate that development should be restricted (highlighted via Footnote 9-6 7 of the Framework). | | | | | | |
| <p>Amend to read</p> <p>In accordance with paragraph 14 of the 2012 11 of the 20192021 National Planning Policy Framework</p> | Part 1 – para 6.1 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | YES | 8 |
| <p>Amend to read</p> <p>The core principles in the 2012 version of the National Planning Policy Framework (paragraph 17) indicated that planning should recognise the intrinsic character and beauty of the countryside and contribute to conserving and enhancing the natural environment. The direction of these core principles have been taken forward into the 2019 2021 NPPF. Consequently, development should relate well to the existing urban forms of settlements to help protect the open countryside and the landscapes contained within it.</p> | Part 1 – para 7.5 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 9 |
| <p>Add in following text:</p> <p>The NPPF was first published on 27 March 2012 and updated on 24 July 2018, 19 February 2019 and 20 July 2021. This report relies upon the 2021 version of the NPPF. Therefore, all subsequent references to the NPPF in this report are references to the 2021 version, where previous versions of the NPPF are referred to this will be made clear.</p> <p>Following the adoption of the Local Plan a number of changes have been made to Permitted Development Rights and the Use Class Order. In determining a planning proposal, the Local Planning Authority will be mindful of any such changes and consider their implications in relation to the application of policy.</p> | Part 1 – end of para 1.9 | RR / PH | To advise on the status of references made in the plan. | N/A – editorial change for clarification purposes | yes | 10 |
| <p>Amend to read</p> <p>Paragraph 47 of the 2012 National Planning Policy Framework places a responsibility on every local planning authority to plan for their full objectively assessed housing need. This is achieved by identifying an Objectively Assessed Need figure (OAN) for housing and then exploring opportunities available to deliver it through planning policy. The OAN is determined using nationally applicable guidance to consider a wide range of evidence on demographics, economic potential and local housing market circumstances to arrive at a recommended level that would allow the needs arising from both demographic change and a growing economy</p> | Part 1 – paragraph 9.7 | RR / PH | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has | N/A – editorial change for clarification purposes | yes | 11 |

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|--|---|---------------------------------|---|---|--|---|
| to be realised. The recommendation informs the basis of a specific housing requirement which is established within the Local Plan. | | | impacted the partial review process. | | | |
| Amend to read The 2012 National Planning Policy Framework (paragraph 47) states that in order to deliver a wide choice of high quality homes and to boost significantly the supply of housing- l local planning authorities should identify a supply of specific, deliverable sites for years one to five of the plan period and specific developable sites, or broad locations of growth for years 6-10 and, where possible years 11-15 of the plan. | Part 1 – paragraph 12.1 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 12 |
| Amend to read The 2012 National Planning Policy Framework also states that the supply of new homes can sometimes be best achieved through planning for a larger scale development, such as new settlements or extensions to existing villages and towns that follow the principle of Garden Cities. For instance paragraph 52 of the 2012 NPPF states that <i>‘Working with the support of local communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development. In doing so, they should consider whether it is appropriate to establish Green Belt around or adjoining such new development.’</i> | Part 1 – paragraph 12.2 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 13 |
| Amend to read Paragraph 23 of the 2012 Framework ¹ suggests that planning policies should be positive and promote competitive town centres | Part 1 – paragraph 19.10 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | Yes | 14 |
| Amend criteria x) in policy SG13 Where possible to do so, d Development should explore opportunities aimed at minimising energy use, reducing emissions and maximising energy efficiency. This should include investigating opportunities to deliver district heating systems in the South Heysham area. | Part 1 – Policy SG13 | RR | Recommendation from the SA | Provides a firmer basis for requiring energy efficiency improvements | yes | 15 |
| Policy T4 to be amended as follows: Developments that generate significant levels of traffic movements should be supported by frequent high quality public transport linking them to Lancaster City Centre or other key destinations, such as the main urban centres and employment areas. Where there are deficiencies in existing services, Developers will be required to ensure the provision of such new services or enhanced existing services, as necessary developers | Part 1 – Policy T4 | RC | Response to recommendation from the SA and representations at Regulation 18 stage. | N/A – editorial change for clarification purposes | yes | 16 |

¹ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|--|---|---------------------------------|---|---|--|---|
| will be required to fund the provision of such new services or enhanced existing services, as necessary from first occupation of the development for a period of up to 10 years, or five years after last occupation, whichever comes sooner. The commencement of such services and the duration of support will be considered on a case by case basis. For all development, public transport services should be within reasonable safe walking and cycling travel distance of all parts of the development. Secure cycle parking should be provided at public transport hubs. | | | | | | |
| Amend paragraph 10.58 to read ...Retrofit measures may be safely introduced individually, but a combination of several may have a harmful effect. Where Responsible Retrofit is not achieved, it can lead to unintended consequences. The biggest risk in introducing retrofit measures is their effect on building permeability and ventilation: inadequate permeability or ventilation poses a risk to both historic building fabric and occupant health | Part 2 – Policy DMCCH1 para 10.58 | AH | Recommendation from the SA | To improve the sustainability of the policy in line with recommendations from the SA. | YES | 17 |
| Amend Paragraphs 10.60 and 10.61 as follows: 10.60 In some cases where proposals do not satisfy the requirements of this policy it may be possible to instead consider proposals for micro-renewables under policy CCH2. Moreover, simple draughtproofing and insulation can usually be achieved without harming the heritage significance of the building. 10.61 In some cases where proposals do not satisfy the requirements of this policy it may be possible to instead consider proposals for micro-renewables under policy DMCCH2. However, proposals should demonstrate that they are consistent with the energy hierarchy, as described in Policy DM30a. Responsible Retrofit means that, as a minimum, simple improvements to draughtproofing and insulation would need to have been carried out. This is important as the installation of new heating systems, such as heat pumps, may depend on such simple improvements to be effective. | Part 2 – Policy DMCCH1 | RR | Recommendation from the SA | To improve the sustainability of the policy in line with recommendations from the SA. | yes | 18 |
| Amend policy to read II. Avoid harm to the significance of the asset via its setting, or where harm can be appropriately mitigated through the impact of installations on their setting or where harm can be appropriately mitigated by sensitive design or screening. This includes considering the impact on Conservation Areas and Registered Parks and Gardens and the contribution of the surrounding landscape character to the setting. | Part 2 – Policy DMCCH2 | RR | Recommendation from the SA | To improve the sustainability of the policy in line with recommendations from the SA. | YES | 19 |
| Amend to read In accordance with paragraph 23 of the 2012 NPPF ² , the Local Plan Policies Map identifies a series of town centre designations that define the boundary of the Primary Shopping Area | Part 1 – paragraph 19.25 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan | N/A – editorial change for clarification purposes | yes | 20 |

² <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|---|---|---------------------------------|---|---|--|---|
| | | | was adopted and how this has impacted the partial review process. | | | |
| <p>Amend to read</p> <p>The 2012 National Planning Framework clearly states that planning policies should promote competitive town centres that provide customer choice and a diverse retail offer and that reflect the individuality of town centres. The Framework also states that Local Plans should retain and enhance existing [retail and leisure] markets and, where appropriate, re-introduce or create new ones, ensuring that [retail and leisure] markets remain attractive and competitive.</p> | Part 1 – paragraph 19.27 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 21 |
| <p>Amend to read</p> <p>It will also ensure that the Local Plan is in accordance with paragraph 23 of the 2012 National Planning Policy Framework, which states that:</p> <p><i>‘Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period.’</i></p> | Part 1 – paragraph 19.30 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 22 |
| <p>Amend to read</p> <p>The planning system should actively enhance and protect the natural environment. Paragraph 114 of the 2012 National Planning Policy Framework requires local planning authorities to <i>‘set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancements and management of networks of biodiversity and green infrastructure’</i>.</p> | Part 1 – paragraph 22.8 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 23 |
| <p>Amend to read</p> <p>The Review has involved the assessment of all the land and boundaries that constitute the Green Belt in terms of how they fulfil the national purposes of the Green Belt as identified in Paragraph 80 of the 2012 National Planning Policy Framework.</p> | Part 1 – paragraph 22.23 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 24 |
| <p>Amend to read</p> <p>Development will also only be considered not inappropriate if it is in accordance with paragraph 89 and 90 of the 2012 Framework.</p> | Part 1 – Policy SC2 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan | N/A – editorial change for clarification purposes | yes | 25 |

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|---|---|---------------------------------|---|---|--|---|
| | | | was adopted and how this has impacted the partial review process. | | | |
| Amend to read Paragraph 9 of the 2012 National Planning Policy Framework (NPPF) ³ stresses the importance of moving from a net loss of biodiversity to achieving net gains for nature as part of achieving sustainable development. Section 11 of the 2012 NPPF plus other legislation, regulations and guidance set out how this can be achieved and the legal duties and requirements for nature conservation. | Part 1 – paragraph 22.40 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 26 |
| Amend Appendix B – Include the National Planning Framework 2018 and 2021 in the list The up-to-date SA, HRA, HIA and EA will also be included | Part 1 – appendix B And Part 2 – appendix B | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 27 |
| Amend paragraph D.3 Appendix D as follows: In line with the recommendations described in the Habitats Regulation Assessment Report for the adopted Local Plan the Council will require the following mitigation measures to be implemented as part of any future proposal for the following allocations, set out in table D2. Although the details and/or need for these mitigation measures will be determined at the project level. As the Partial Review does not address the issues around land allocation and development needs the content of Appendix D continues to relate solely to the original allocations made in the Local Plan (July 2020) | Part 1 – Appendix D | RR | To update to reflect current circumstances. | N/A – editorial change for clarification purposes | yes | 28 |
| Footnote 8 should be deleted. No need to reference the 2012 NPPF here. | Part 2 – paragraph 4.1 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 29 |
| Amend to read Paragraph 159 of the 2012 Framework requires Local Planning Authorities to understand and plan for the current and future housing needs of the area. This requires local planning authorities to gather evidence and | Part 2 -Paragraph 4.9 | RR | To ensure understanding of compliance with the changes to the NPPF | N/A – editorial change for clarification purposes | yes | 30 |

³ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|--|---|---------------------------------|---|---|--|---|
| implement policies through the Local Plan which provides for the full range of housing needs, covering the scale, mix and type of housing (including affordable housing) and the needs of different groups in the community. | | | since the Local Plan was adopted and how this has impacted the partial review process. | | | |
| Amend to read <u>New Homes in Isolated Locations outside Settlements</u> Proposals for new homes in locations outside of identified sustainable settlements or other rural villages are unacceptable unless they meet the special circumstances set out in Paragraph 55 of the 2012 Framework. | Part 2 – Policy DM4 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 31 |
| Amend to read However, there may be special circumstances as set out in paragraph 55 of the 2012 Framework. | Part 2 – paragraph 4.47 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 32 |
| Amend to read In accordance with paragraph 22 of the 2012 National Planning Policy Framework ⁴ (the Framework), the Council | Part 2 – paragraph 5.8 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | Yes | 33 |
| Amend to read Paragraph 21 of the 2012 Framework recognises the importance of small businesses, suggesting that Local Plans should ‘support existing business sectors, taking into account whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area’ | Part 2 – paragraph 5.14 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 34 |
| Amend to read | Part 2 – Policy DM16 | RR | To ensure understanding of | N/A – editorial change for clarification purposes | yes | 35 |

⁴ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|---|---|---------------------------------|---|---|--|---|
| Development proposals for main town centre uses that are not located in city or town centre locations (as defined in Policy TC1 of the Strategic Policies & Land Allocation DPD), or are not in accordance with specific policies in the Strategic Policies and Land Allocations DPD, will be expected to demonstrate that the sequential test has been applied to identify the proposal's site, as set out in paragraph 24 of the 2012 National Planning Policy Framework. | | | compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | | | |
| Amend to read Outside of city and town Centre boundaries for Lancaster, Morecambe and Carnforth (as defined on the Local Plan Policies Map), the Council will require an impact assessment in accordance with paragraph 26 of the 2012 Framework for any proposals which will result in the creation of over 500sqm of gross floorspace. | Part 2 – Policy DM16 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 36 |
| Amend to read However, smaller units and a greater mix of shops that ‘promote competitive town centres that provide customer choice and diverse retail offer and which reflect the individuality of town centres.’ (Paragraph 23 of the 2012 National Planning Policy Framework ⁵) should be retained | Part 2 – paragraph 6.3 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 37 |
| Amend to read Town centre uses should be directed to city or town centre locations. Where proposals seek to deliver these uses outside city or town centres, the sequential test set out in paragraph 24 of the 2012 Framework will be applied | Part 2 – paragraph 6.5 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | Yes | 38 |
| Amend to read This policy builds on national guidance to help regenerate and reinforce the vitality and viability of existing centres as expressed in paragraph 23 of the 2012 Framework | Part 2 – paragraph 6.7 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 39 |

⁵ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|---|---|---------------------------------|---|---|--|---|
| Amend to read These have been designated within the provisions of paragraph 23 of the 2012 Framework which states | Part 2 – paragraph 6.8 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 40 |
| Amend to read Outside of defined city, town and local centres, the development of main town centre uses (as defined by Annex 2 of the 2012 Framework) will be supported provided that: | Part 2 – Policy DM19 | PH | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 41 |
| Amend to read The Council will support the development of leisure facilities and attractions in sustainable locations within the main urban settlements, primarily within sustainable town centre locations or edge of town centres where the sequential approach has been followed in accordance with paragraph 24 of the 2012 National Planning Policy Framework | Part 2 – paragraph 7.2 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 42 |
| Amend to read Should an edge-of-centre or out-of-centre location be proposed, that the sequential approach set out in Paragraph 24 of the 2012 Framework will be applied | Part 2 – paragraph 7.6 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 43 |
| Amend to read ...nor will the Council seek to overburden development in accordance with paragraph 153 of the 2012 National Planning Policy Framework | Part 2 – paragraph 8.6 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 44 |

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|---|---|---------------------------------|---|---|--|---|
| Amend to read The National Planning Practice Guidance (NPPG) published by the Government in 2019-2014 sets out a full range of guidance on matters relating to flood risk | Part 2 – paragraph 9.28 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 45 |
| Amend to read The Council will protect and enhance the value of heritage assets, whether they are designated or non-designated, to ensure their long-term future for the conservation and enjoyment of the historic environment, in accordance with the principles set out in paragraph 126 of the 2012 National Planning Policy Framework- | Part 2 - Paragraph 10.3 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | Yes | 46 |
| Amend to read ... under paragraph 128 of the 2012 NPPF ⁶ . | Part 2 – paragraph 10.4 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 47 |
| Amend to read The following criteria as set out in Paragraph 133 of the 2012 National Planning Policy Framework will apply: | Part 2 – Policy DM37 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 48 |
| Amend to read Proposals should be accompanied by a statement of significance which should form part of the heritage assessment (which may form part of the design and access statement) to demonstrate that the architectural and historic interest of the structure has been understood and accounted for in any proposal in accordance with paragraph 128 of the 2012 National Planning Policy Framework. | Part 2 – Policy DM37 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has | N/A – editorial change for clarification purposes | yes | 49 |

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|---|---|---------------------------------|---|---|--|---|
| | | | impacted the partial review process. | | | |
| Amend to read These elements may comprise a variety of features including windows, staircases, internal layouts, landscaping and tree planting for example. In the assessment of the level of harm to the asset, consideration must be given to paragraphs 133 and 134 of the 2012 NPPF. | Part 2 – paragraph 10.11 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 50 |
| Amend to read Substantial harm to the Conservation Area will not be permitted unless it can be demonstrated that the substantial loss or harm is necessary to achieve substantial public benefits that outweigh the harm or loss. All the criteria which are set out within paragraph 133 of the 2012 National Planning Policy Framework should be met. | Part 2 – Policy DM38 | PH | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 51 |
| Amend to read Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to Schedule Monuments should be subject to the same policies as a designated heritage asset, in accordance with paragraph 139 of the 2012 NPPF. | Part 2 – paragraph 10.54 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 52 |
| Amend to read Where adverse effects are unavoidable these should be minimised and mitigated against, and where this cannot be achieved, compensated for via net gains. Proposals should meet the requirements of paragraph 118 of the 2012 National Planning Policy Framework. | Part 2 – Policy DM44 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 53 |
| Amend to read Proposals should provide appropriate protection and prevent harm in accordance with paragraph 118 of the 2012 National Planning Policy Framework (NPPF) | Part 2 – paragraph 11.27 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has | N/A – editorial change for clarification purposes | yes | 54 |

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|--|---|---------------------------------|---|---|--|---|
| | | | impacted the partial review process. | | | |
| Amend to read is government policy to safeguard the highest grades and most versatile agricultural land (land grades 1, 2 and 3a of the Agricultural Land Classification) in relation to conserving soil resources. In accordance with paragraph 109 of the 2012 NPPF the planning system should seek to protect and enhance soils because it is an important natural resource | Part 2 – paragraph 11.30 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 55 |
| Amend to read Consideration will be given to both the individual and cumulative impacts of a proposal. Proposals that would have a significant adverse effect upon the character of the landscape or visual amenity of protected landscapes will not be permitted in accordance with paragraphs 115 and 116 of the 2012 National Planning Policy Framework. | Part 2 -Policy DM46 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 56 |
| Amend to read The Council will support and encourage the delivery of improved broadband provision for rural areas to encourage rural employment and home-working. Development proposals should consider how they may assist in the delivery of improved broadband speeds within rural areas in accordance within Policy DM59 of this document and paragraph 43 of the 2012 National Planning Policy Framework. | Part 2 – Policy DM48 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 57 |
| Amend to read This is re-affirmed in paragraph 115 of the 2012 NPPF ⁷ which states that great weight should be given to conserving such areas. The requirements set out in paragraph 116 of the 2012 NPPF should be a material consideration for proposals for major developments located within these areas. | Part 2 – paragraph 11.45 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 58 |
| Amend the policy to read: <i>Community Infrastructure Levy (CIL) and S106 Obligations</i> Council will require planning contributions where they meet the tests set out in paragraph 57 | Part 2 – Policy DM58 | | To ensure understanding of compliance with the changes to the NPPF since the Local Plan | N/A – editorial change for clarification purposes | yes | 59 |

⁷ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|--|---|---------------------------------|---|---|--|---|
| 56-204 (to be updated following the publication of the revised Framework) | | | was adopted and how this has impacted the partial review process. | | | |
| Amend to read National Policy via the National Planning Policy Framework⁸ (the Framework) states that development within rural areas should be carefully managed in order to protect its intrinsic value and natural resources. Policies contained within this section set out the circumstances in which development outside urban settlements should be considered, where taking into account the particular characteristics of the locality and rural economy. | Part 2 – paragraph 12.1 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 66 |
| Amend to read Acceptable uses are set out within paragraph 89 of the 2012 NPPF and this policy does not repeat such guidance | Part 2 – paragraph 12.14 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 61 |
| Amend to read The Council will seek to manage development in the Green Belt to avoid inappropriate development, consistent with paragraph 87 of the 2012 NPPF. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very exceptional circumstances. | Part 2 – paragraph 12.13 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 62 |
| Delete following reference on page 155 ¹ Paragraph number to be updated following publication of the revised NPPF | Part 2 – page 155 | DN | editorial change for clarification purposes | N/A – editorial change for clarification purposes | yes | 63 |
| Amend to read In order to achieve greater connectivity, the Council will support the improvement and extension of telecommunication and broadband coverage and broadband speeds, particularly in urban and rural areas that have poor or no service provision at all. This is providing that the proposals accord with paragraph 43 of the 2012 National Planning Policy Framework and that the following criteria are achieved. | Part 2 – Policy DM59 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 64 |

⁸ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|--|---|---------------------------------|--|--|--|---|
| Amend to read 1 As made explicit by the 2012 National Planning Policy Framework ⁹ in paragraphs 29 and 30 state that <i>“the transport system needs to be more balanced in favour of sustainable transport modes”</i> and that <i>“In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.”</i> | Part 2 – paragraph 16.1 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | Yes | 65 |
| Amend to read Paragraph 207 of the 2012 National Planning Policy Framework ¹⁰ states that the effective enforcement of planning controls is important as a means of maintaining public confidence in the planning system | Part 2 – paragraph 17.1 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 66 |
| Amend to read Where a breach of planning control has taken place, the Council will take enforcement action where necessary that is proportionate to the breach, in accordance with paragraph 207 of the 2012 National Planning Policy Framework | Part 2 – policy DM65 | RR | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 67 |
| Amend to read/includes reordering. <u>Materials, waste and construction</u> 1. Materials that arise through demolition and refurbishment are reused and recycled wherever possible, including the reuse of excavated soil and hardcore within the site; 2. Proposals for major development must be accompanied by a site waste management plan setting out how site waste will be managed during the construction phase; 3. The full lifecycle of the building from concept to demolition (and how demolition materials can be used), alongside lifecycle emissions and environmental pollutants, must be considered; 4. Where possible, use local suppliers, renewable and/or low carbon materials and modern methods of construction. | Part 2 DM30c | IG/SD | Omitted from Reg 18 in error so has now been included in Reg 19 document. Layout has also been rearranged to provide clarity. And to satisfy reps received. | This addition of point 3 is to account for a range of factors, including future-proofing for climate impacts, how uses may change, allowing the addition of mitigation and adaptation features in later stages, considering low carbon materials, preparing for future demolition and how this waste will be processed and so forth. This will contribute to both mitigation and adaptation as emissions can be reduced and climate impacts can be adapted | yes | 68 |

⁹ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

¹⁰ <https://www.gov.uk/governmentpublications/national-planning-policy-framework--2>

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|--|---|---------------------------------|---|---|--|---|
| 5. Green/blue roofs and/or walls have been incorporated into the structure of buildings where appropriate, to improve water management in the built environment, improve air quality, provide space for biodiversity and aid resilience and adaptation to climate change. | | | | to throughout the development's lifetime. | | |
| <p>New para added after para. 9.46</p> <p>9.47 Consideration for the full lifecycle of the building accounts for a range of factors including: future-proofing for climate impacts; materials that are easily reparable; use of materials which do not outgas, produce dust, or leach compound which are human or environmental toxins; how uses may change over the building lifecycle; constructing the building to allow for the addition of mitigation and adaptation features in later stages; inclusion of low carbon/carbon sequestering materials; understanding future demolition; and how demolition waste will be processed/recycled.</p> | Part 2 DM30c supporting text | IG/SD | To support the addition of Point 3 in DM30c, to provide explanation. | Considering the usage and changes of a building throughout its lifecycle will contribute to both mitigation and adaptation by allowing for future-proofing, retrofitting of mitigation and adaptive measures, and reducing embodied carbon. | yes | 69 |
| <p>Addition to paragraph 9.5</p> <ul style="list-style-type: none"> • Provide opportunities for the growing of food for personal consumption; and • Provide space for composting infrastructure in individual gardens or community spaces as appropriate; and • Include edible plants and trees within the landscaping. | Part 2 DM29 | SD | To add clarity to the supporting text following amendments to the policy wording. | This contributes to climate change adaptation in encouraging local food growing and utilising food waste. | yes | 70 |
| <p>Amend to read</p> <p>II. Ensure opportunities are taken to maximise solar gain and solar electric/thermal energy generation through the site layout, and building orientation and design of buildings for the purpose of energy efficiency and energy generation;</p> | Part 2 DM29 | FC | To address the role site layout has in reducing energy use. | The change will emphasise the role site layout has in reducing energy use in buildings. | yes | 71 |
| <p>Add paragraph to supporting text after policy before para 9.3</p> <p><i>Site Layout and Design</i> The layout of a site and the design of buildings have a significant impact upon how the site addresses climate change. Layout and design should be optimised for energy and heat production, energy efficiency, green and blue infrastructure for carbon and heat capture, sustainable drainage, biodiversity enhancement, food production and recreational, modal shift to sustainable transport and facilities to reduce the need to travel.</p> | Part DM29 Supporting text | FC | To add text to support bullet points II and VII. | To address the role that these matters have in addressing climate change. | yes | 72 |
| <p>Add additional bullet point:</p> <p><i>Private garden space should be free from flood risk and well drained so will read:</i></p> <p>Addition to paragraph 9.5</p> <ul style="list-style-type: none"> • Provide opportunities for the growing of food for personal consumption; and | Part 2 Para 9.5 | FC | To improve consistency with policy DM33 | This change would improve availability of garden space for associated health and wellbeing benefits. | yes | 73 |

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|--|---|---------------------------------|---|---|--|---|
| <ul style="list-style-type: none"> • Provide space for composting infrastructure in individual gardens or community spaces as appropriate; and • Include edible plants and trees within the landscaping, and • <i>Private garden space should be free from flood risk and well drained</i> | | | | | | |
| DM45 reworded to include reference to street trees and consideration of trees through lifetime of development. See Appendix 2 of this table for new policy wording. | Part 2 DM45 | IG | Consistency with the 2021 NPPF | This change explicitly establishes a requirement for street trees, as per suggestions in the newly updated 2021 NPPF. This contributes to both mitigation and adaptation to climate change through reducing carbon emissions from photosynthesis, providing shade, slowing and improving infiltration, and providing new habitats for wildlife. | yes | 74 |
| Delete Appendix C, subsequent paragraphs will need to be renumbered. | Part 2 Appendix C | IG | To reflect current position. Appendix is no longer required. | N/A – change to ensure ease of use of the documents | yes | 75 |
| <p>Amend to read</p> <p>New development will need to satisfy the requirements of the sequential test and exception test where necessary in accordance with the requirements of national planning policy and any other relevant guidance, <i>including the Council's Flood Risk - Sequential Test and Exception Test and Sustainable Drainage</i> Supplementary Planning Document. Where proposals fail to satisfy the requirement of these tests they will be refused.</p> | Part 2 DM33 | FC | The previous SPD was to include advice on drainage and the tests. The topics have been split into 2 SPDs to make them distinct and easier to use. | N/A – change to ensure ease of use of the documents | yes | 76 |
| I. Proposals are supported by a Sequential Test, and where necessary Exception Test in accordance with National Planning Policy, <i>other relevant guidance and the Council's Flood Risk – Sequential Test and Exception Test and Sustainable Drainage</i> Supplementary Planning Document; | Part 2 DM33 | FC | The previous SPD was to include advice on drainage and the tests. The topics have been split into 2 SPDs to make them distinct and easier to use. | N/A – change to ensure ease of use of the documents | yes | 77 |
| <p>II. An Exception Test is passed will be required for sites allocated in the Local Plan, where new data sources with regard to flood risk become available and those sources indicate that flood risk from any source has increased since a site was allocated and Table 3: flood risk vulnerability and flood zone compatibility indicates it is necessary¹ in the Local Plan;</p> <p>Add footnote: <i>Planning Practice Guidance Paragraph: 067 Reference ID: 7-067-20140306</i></p> | Part 2 DM33 | FC | Improved drafting and consistency within the planning practice guidance. | N/A – change to improve drafting | yes | 78 |
| <p>III.</p> <p>b. All development (apart from minor extensions development^A) in the High Risk Urban Catchments as identified within the Strategic Flood Risk Assessment</p> <p>Add footnote in policy</p> | Part 2 DM33 | FC | To ensure consistency with the definition in national guidance. | N/A – change to improve drafting | yes | 79 |

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|---|---|---------------------------------|---|---|--|---|
| A – Minor development in relation to flood risk as defined in the Planning Practice Guidance Paragraph: 046 Reference ID: 7-046-20140306 | | | | | | |
| IX. Sites must should be drained on a separate system with foul water draining to the public sewer (or package treatment plant where a public sewer is not available) and surface water draining in the most sustainable way, in accordance with the Sustainable Drainage Hierarchy in policy DM34; and | Part 2 DM33 | FC | To ensure change in emphasis to ‘must’ does not preclude package treatment plants where no public sewer is available. | N/A – change to improve drafting | yes | 80 |
| VII. There is no adverse effect on the operational functions of any watercourse or existing flood defence infrastructure and opportunities are taken to improve the function of watercourses, such as removing culverts and naturalisation of heavily modified channels and manage peak flows; | Part 2 DM33 | FC | To address comments raised and enhance the way in which watercourses can address climate change. | Enhance the use of water courses to management peak flows in response to climate change. | yes | 81 |
| the flooding in South Lancaster, Galgate and Halton in November 2017 | Part 2 para 9.20 | FC | To widen areas referred to and address comments received. | N/A – change to improve drafting | yes | 82 |
| Add High Risk Urban Catchment Map - Title : <i>Figure 9.2: High Risk Urban Catchments Map (SFRA 2021)</i> See Appendix 4 below. | Part 2 DM33 after para 9.23 | FC | To improve access to information about the High Risk Urban Catchments | N/A – change to improve drafting | yes | 83 |
| The Council has prepared an updated Strategic Flood Risk Assessment (Level 1) (SFRA) published in November 2017 dated June 2021 which provides recommendations for managing flood risk within the District. The SFRA Assessment also identifies those areas within the functional floodplain (Flood Zone 3b). These areas are required to be kept free from development so that they allow the storage of floodwater at times of flooding in a place which avoids risk to people. The SFRA assesses the cumulative impact of development and identifies High Risk Urban Catchments, High Risk Rural Catchments and the remaining medium and low catchments in the district. Policy DM33 addresses the recommendations within the SFRA, in particular, the requirement for the submission of a Flood Risk Assessment for a wider range of development reflecting the risks within the district. These include a requirement for the submission of a Flood Risk Assessment to accompany all development applications, apart from minor extensions, in the High Risk Urban Catchments. ‘Minor development extensions’ is defined in the Planning Practice Guidance (Paragraph: 046 Reference ID: 7-046-20140306) as, non-residential extensions with a footprint less than 250 square metres, alterations that do not increase the size of buildings or householder development. consist of an extension to a residential property or extensions under 1000 square metres of floor space to other buildings. The High Risk Urban Catchments are shown on the map 9.2 below. The catchments, culverted water courses and areas benefiting from defences are shown on an interactive map ¹¹ . The remaining constraints which affect when a flood risk assessment will be required can be found on the Environment Agency Website. Policies DM33 and DM34 address the remaining policy recommendations within the SFRA (2021). The Lancaster Surface Water Management Plan will explore the causes of flooding in Lancaster | Para 9.23 | FC | To improve access to information about when a FRA is required | N/A – change to improve drafting | Yes | 84 |

¹¹ <https://lancaster.maps.arcgis.com/apps/webappviewer/index.html?id=e49db274222f476ea7045cd4295b8868>.

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|---|---|---------------------------------|---|---|--|---|
| city, options for how surface water can be managed and take forward suitable and deliverable measures in an Action Plan. Footnote 11 is https://lancaster.maps.arcgis.com/apps/webappviewer/index.html?id=e49db274222f476ea7045cd4295b8868 . | | | | | | |
| Amend paragraph Para 157c now Para 161c Remove 39 footnote referring to NPPF update | Part 2 para 9.25, 9.26, 9.33 | FC | Consistency with the 2021 NPPF | N/A - editorial change to be made for consistency with the 2021 NPPF | Yes | 85 |
| Amend paragraph Para 157c now Para 161c Remove 39 footnote referring to NPPF update | Part 2 para 9.26 | FC | Consistency with the 2021 NPPF | N/A - editorial change to be made for consistency with the 2021 NPPF | yes | 86 |
| Amend paragraph Para 157c now Para 161c Remove 39 footnote referring to NPPF update | Part 2 para 9.27 | FC | Consistency with the 2021 NPPF | N/A - editorial change to be made for consistency with the 2021 NPPF | yes | 87 |
| ii. Attenuated source control such as infiltration such as through perviousmeable surfaces, soakaways, rain gardensunlined ponds, swales and trenches, wetlands etc., iii. Attenuation and conveyance using above ground in ponds or water features (including ponds, swales etc.) for gradual release into infiltration features and if this is not possible to a watercourse, iv. Treat then Aattenuate | Part 2 DM34 | FC | To improve the phasing of the policy and ensure that source control and conveyance are included. | This change will enhance how the hierarchy addresses water management. | yes | 88 |
| Second set of bullet points <ul style="list-style-type: none"> Where a site includes a water course, development must include measures to restore and provide natural flood management, remove and naturalise culverts, create a steady-predictable flow, include storage, measures to slow water flow manage peak flows; and | Part 2 DM34 | FC | To address comments raised and enhance the way in which watercourses can address climate change. | Enhance the use of water courses to management peak flows in response to climate change. | yes | 89 |
| Add criteria to list of SuDS design matters after <ul style="list-style-type: none"> slow water flow and manage peak flows; and Measures of an adoptable standard; and . Appropriate safety measures. | DM34 | FC | To ensure safety is addressed. | N/A – change relates to safety of SuDS features. | yes | 90 |
| Add to bullet point: <ul style="list-style-type: none"> A Sustainable dDrainage sStrategy. The Sustainable dDrainage sStrategy must show the type of sustainable drainage system and/or detailed measures proposed to control the flow of water/surface water and measures to protect from flood risk flooding and pollution during construction and on completion of the development (depending on the type of application). For any development proposal which is part of a wider development site, it will be necessary to ensure the foul and surface water drainage proposals are part of a wider, holistic strategy which coordinates the approach to drainage between phases, between developers, and over a number of years of construction. | DM34 | FC | For further clarity | N/A – change relates to clarity | yes | 91 |
| Paragraph prior to last set of bullet points (apart from minor developmentextensions^c) | DM34 | FC | To ensure consistency with the | N/A – change to improve drafting | | 92 |

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|--|---|---------------------------------|--|--|--|---|
| | | | definition in national guidance and DM33 | | | |
| <ul style="list-style-type: none"> Amend bullet point: The NW SuDS Pro-forma | DM34 | FC | To improve drafting, the Proforma will be adopted and become Lancaster's Proforma | N/A – change relates to clarity | yes | 93 |
| Add to bullet point: <ul style="list-style-type: none"> A comprehensive Surface Water Lifetime Management and Maintenance Plan which includes how minimum standards of operation are appropriate and that clear arrangements are in place and funding mechanism for ongoing management and maintenance over the lifetime of the development. | DM34 | FC | To ensure funding is addressed. | This change will ensure the funding of management and maintenance is addressed. | yes | 94 |
| Amend last bullet point: <ul style="list-style-type: none"> Post construction, applicants must provide to the Council certification that the sustainable drainage scheme has been implemented in accordance with the approved Strategy scheme. | DM34 | FC | For clarity | N/A – change relates to clarity | yes | 95 |
| Remove hyphen between the and Flood (typo) Further information about the requirements can be found in the -Flood Risk and Sustainable Drainage SPD. | DM34 | FC | Rectify typo | N/A – change to improve drafting | yes | 96 |
| Footnote A A – Peak runoff rate, runoff volume and rainfall events as defined in the Department for Environment, Food and Rural Affairs, Sustainable Drainage Systems, Non-statutory technical standards for sustainable drainage systems, March 2015 - Sustainable Drainage Systems: Non-statutory technical standards for sustainable drainage systems (publishing.service.gov.uk) or any future update. | DM34 | FC | To anticipate an update to the document to reflect the February 2021 report. | N/A – change to future proof policy | yes | 97 |
| <ul style="list-style-type: none"> Footnote C C – Minor consist of an extension to a residential property or extensions under 1000 square metres of floor space to other buildings. Minor development in relation to flood risk as defined in the Planning Practice Guidance Paragraph: 046 Reference ID: 7-046-20140306. | DM34 | FC | To ensure consistency with the definition in national guidance and DM33 | | | 98 |
| Delete ● Sewers for Adoption 8. Replace with: <ul style="list-style-type: none"> UU Design and Construction Guidance (DCG) | Para 9.39 | FC | To correct error | N/A – change to improve drafting | yes | 99 |
| Include additional criteria 7. Recognising the important role that the district's soils provide in mitigating climate change through carbon storage and sequestration | Part 1 - CC1 | RR | Recognise the importance of soil. Change was recommended by Natural England | The change would recognise the contribution of soil to mitigating climate change through carbon storage and sequestration. Not sure this value is picked up enough at the moment. | yes | 100 |
| Amend Policy SP8 to read The Council recognises the importance of biodiversity and geodiversity, and has prepared a Local Plan that will seek to protect sites of recognised importance; it will also seek to protect areas of land that are functionally linked to areas which are of International and / or National importance. The Council also recognises the | SP8 | RR | To highlight the importance of this new designation. Change was | The change would strengthen the policy and recognise the existence of the new designation. | yes | 101 |

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|---|---|---------------------------------|--|---|--|---|
| importance of biodiversity net gain and nature recovery, and contributing towards strengthening the National Nature Recovery Network to restore and enhance the natural environment, working with the responsible authority to produce a Local Nature Recovery Strategy to deliver these requirements in accordance with the Environment Bill. Development proposals will be expected to protect, maintain and enhance the district's biodiversity and geodiversity, and other green and blue infrastructure functions, through the appropriate location of uses, sympathetic design, sustainable construction techniques and appropriate mitigation measures. | | | recommended by Natural England. | Need to keep an eye on the Environment Act to ensure that they do get implemented. | | |
| Add definition of 'Better Buses' to Appendix A Term: Better Buses Description: The term encompasses the improved bus services that will come forward through the Enhanced Bus Partnership being developed by the County Council. The partnership will produce a Bus Service Improvement Plan which will set targets for journey times and reliability and identify where bus priority measures are needed in order to tackle air quality and carbon reduction targets. | Appendix A | DN | For the purposes of clarity and to satisfy rep 014a/19 | N/A – change to improve drafting | yes | 102 |
| Amend text of DM53: The Council is committed to supporting the transition to a lower carbon future as a matter of urgency and will seek to maximise the renewable and low carbon energy (electricity and thermal) generated in the District where this energy generation is compatible with other sustainability objectives. The Council will support proposals for renewable and low carbon energy schemes, including ancillary development, where the direct, indirect, individual and cumulative impacts on the following considerations are, or will be made, acceptable (unless material considerations indicate otherwise): I. As a result of its scale, siting or design impacts on the landscape character, visual amenity, impact on the setting of the impact of the setting of nationally designated landscapes, biodiversity, geodiversity, water quality, flood risk, townscape and historic assets of the district, highway safety, aviation and defence navigation system/communications are satisfactorily addressed; | Part 2, DM53 | DN | In response to AONB team comments to Reg 18 consultation | Will prevent negative impact on the AONB and its setting. | yes | 103 |
| Amend DM53 supporting text at last sentence of 13.3: ... a functional linkage to sites of national or international importance. This also includes the setting of nationally designated assets. More specifically wind energy proposals located outside the Arnsdale and Silverdale AONB, Forest of Bowland AONB and Yorkshire Dales National Park will need to take account of potential impacts on their setting. | Part 2, DM53- para 13.3 | DN | In response to AONB team comments to Reg 18 consultation | Will prevent negative impact on the AONB and its setting. | yes | 104 |
| Amend SP8 supporting text to clarify role of GBI Strategy and mapping. To explain weight given and how GBI map is not an allocations/designations map. Proposed new wording in blue below: | Part 1 Policy SP8 | EH | In response to CPRE (Lancaster University) comments to Reg 18 consultation | editorial change for clarification purposes to reflect GBI evidence base work | yes | 105 |

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|--|---|---------------------------------|--|--|--|---|
| To inform the Local Plan Review, the Council have produced a Green and Blue Infrastructure Strategy, which highlights the multifunctional values and benefits of the District's green and blue spaces, corridors and chains, which make up the existing green and blue infrastructure network, and explores opportunities for the enhancement and expansion of this network. Ultimately the aim is to ensure the green and blue infrastructure network is as resilient as possible to the potential impacts of climate change, and can ultimately reduce, and mitigate and/or adapt to the consequences the District faces as a result of changes in our climate. For example, habitat fragmentation, which can then lead to habitat degradation and species loss. The interactive map that accompanies the written Strategy has been produced as a tool to be used as early on as possible in the design process to guide and inform planning proposals to ensure the valuable role that green and blue infrastructure can provide is taken into account from the start of the design of new development. The role of this map is not to allocate land but to identify the known key elements of the existing green and blue infrastructure network across the District to be taken into consideration, and spatially identify ways in which the network can be enhanced and/or extended, to ensure the benefits our green and blue spaces, corridors and chains provide are maximised. This will be a live interactive map that will be updated as data becomes available to ensure the tool is kept up-to-date and remains as useful as possible. | | | | | | |
| Amend wording in policy SC4 and paragraph 23.18 to rename 'Appendix X' as 'Appendix 7'. Correct references to 'Appendix 7'. | Part 1 Policy SC4 and supporting text | EH | In response to CPRE (Lancaster University) comments to Reg 18 consultation | For clarity when reading supporting documentation. | Yes | 106 |
| Amend text of DM30b The design of new developments should consider maximise the inclusion of water efficiency and consumption measures, such as rainwater and/or greywater recycling, green roofs, low flow taps and showers, low flush toilets, rain gardens, and water butts in the construction of new buildings. | Part 2 DM30b | SD | To include greywater as a key area not included in original text. Other changes in response to Reg 18 consultation. | This will impact mitigation in that less water will go through waste water treatment plants so emissions associated with water treatment will be reduced. It will also impact adaptation as new development will make better use of water on site and help to alleviate water being lost or wasted particularly in times of water stress. | yes | 107 |
| New monitoring framework to be inserted as shown at appendix 5 below | Part 1 | RR & DN | New indicators added and updates to existing. | Updates to indicators will strengthen the monitoring of the plan by ensuring that the policy aims in relation to adaptation and mitigation are being achieved. It will highlight where any gaps lie and allow for policy updates in Local Plan Reviews. | yes | 108 |
| ...Ducting/cabling/supply capacity must also be provided/ensured for all parking spaces. Electric vehicle charging infrastructure should be designed to respect the character of the surrounding built environment, streetscape, and public realm. Particular regard should be given to the impact upon the historic | Part 2 DM62 | SD and EH | Changes in response to changes in response to Reg 18 consultation. | Will impact mitigation in allowing disabled motorists to confidently switch to electric vehicles knowing that the charging infrastructure is there and also allow for a more just transition. | yes | 109 |

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|---|---|---------------------------------|--|---|--|---|
| <p>environment and associated planning policies. Charging infrastructure must also be accessible to drivers with disabilities, including those using a wheelchair or walking frame.</p> <p>Wherever possible, electricity provision should be provided through renewable and/or low carbon energy generated on site.</p> <p>Further detail is provided within the Promotion of Electric Vehicles and Associated Charging Infrastructure Provision for Electric Vehicle Charging Points for Development Supplementary Planning Document.</p> | | | <p>Changes also made in response to issue raised in SA in relation to impact of EV charging infrastructure on the historic environment.</p> | <p>Including EV charge point electric demand as part of onsite renewable energy generation will reduce grid associated CO2e emissions contributing to mitigation.</p> <p>Whilst promoting delivery of EV charging infrastructure which helps to reduce impact upon air quality, which has climate change mitigation impacts. Also need to consider impact upon historic environment which also plays a key role in how we address climate emergency declaration.</p> | | |
| <p>The City Council seeks to support the use of sustainable forms of transport, which includes the use of electric vehicles. In order to support the use of such vehicles supporting the necessary infrastructure will need to be put in place to support their use. The City Council will support proposals which seek to deliver opportunities for the use of electric vehicles. To assist with the implementation of this the Council is consulting on an SPD which provides further guidance on the 'Promotion of Electric Vehicles and Associated Charging Infrastructure'. As highlighted in policy DM62, design is an important consideration. Electric vehicle charging infrastructure must be accessible to drivers with disabilities, including those using a wheelchair or walking frame, to ensure charge points can be used by all drivers. To help facilitate this, the Government are developing accessibility standards for electric vehicle charging infrastructure to provide guidance on how to make individual chargepoints more accessible by Summer 2022.</p> <p>The environment within which electric vehicle charging infrastructure is located must also be carefully considered. The provision of electric vehicle charging infrastructure as part of a new development must be designed to respect the character and appearance of the surrounding built environment, streetscape, public realm and civic space. The District is home to over 1300 Listed Buildings and 38 Conservation Areas. In relation specifically to the historic environment, permitted development rights for the installation of an EV charging outlet are removed if the chargers are:</p> <ul style="list-style-type: none"> - Within a site designated as a Scheduled Monument; and/or - Within the curtilage of a Listed Building. <p>Under the provisions set out in the Town and Country Planning (General Permitted Development) Order 2015 (Article 4) the Council can remove or restrict the permitted development rights in relation to a specific site or area. These can be used to preserve features of historic interest in a Conservation Area, and so within the Lancaster District the following Conservation Areas have Article 4 Directions:</p> <ul style="list-style-type: none"> • Bath Mill • Lancaster • Glasson Dock • Heysham • Westfield Memorial Village | Part 2 DM62 Supporting Text 16.28 | SD and EH | <p>Changes in response to Food Futures comments and Mary Kinane comments on Reg 18 consultation.</p> <p>Changes also made in response to issue raised in SA in relation to impact of EV charging infrastructure on the historic environment.</p> <p>(provide more information to explain and support changes made in policy)</p> | <p>Will impact mitigation in allowing disabled motorists to confidently switch to electric vehicles knowing that the charging infrastructure is there and also allow for a more just transition.</p> <p>Including EV charge point electric demand as part of onsite renewable energy generation will reduce grid associated CO2e emissions contributing to mitigation.</p> <p>Whilst promoting delivery of EV charging infrastructure which helps to reduce impact upon air quality, which has climate change mitigation impacts. Also need to consider impact upon historic environment which also plays a key role in how we address climate emergency declaration.</p> | yes | 110 |

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|---|---|---------------------------------|---|---|--|---|
| <ul style="list-style-type: none"> Morecambe <p>Development proposals which have the potential to affect the historic environment must be in accordance with the relevant policies set out in Chapter 10.</p> <p>has produced a Planning Advisory Note on 'The Provision of Electric Charging Points for Vehicles in New Development', which is available for on the Council's website.</p> | | | | | | |
| <p>Following text to be added after district heating and cooling networks in main policy.</p> <p>Energy Storage</p> <p>The Council will support proposals for battery storage facilities and infrastructure providing that they are in conformity with Local Plan Policies and that:</p> <ul style="list-style-type: none"> A clear and evidenced operational lifespan for the facility is defined; It is clearly stated which type of batteries will be used and of what size the units are; A clear and funded plan for site failure including fire and material leakages is provided; A clear definition of what the human and environmental receptors for smoke and materials from potential fires are, and that a plan for mitigating receptor risk is provided; An evidenced decommissioning plan is put into place prior to site development. This plan must include; <ul style="list-style-type: none"> The responsible party for decommissioning; A disposal plan for all solid and hazardous waste including proposed receiving waste facility/facilities; Information detailing how a decommissioning fund structure has been set up with a funding timeline (with the fund preferably held by a third party); Evidenced cost estimates for site decommissioning; A clear outline of how the decommissioning fund will be kept current and up to date; and An evidenced timeline for facility decommissioning and site restoration; | Part 2 DM 53 | SD | Recognises removal of battery storage facilities under 1GW installed and 4GW in planning from NSIP regime and approval to be at local, not Secretary of State, level. | Increased local battery storage will help to transition to decentralised renewable energy generation and distribution thus improving local climate mitigation potential. | yes | 111 |
| <p>Key diagram amendment. Amendment to Key.</p> <p>Key Greenspace Network to be replaced with Green & Blue Corridors and Chains.</p> <p>See appendix 1 to this table.</p> | Chapter 5 of Part 1 and before introduction (page 5) of Part 2 | DN | To reflect GBI Strategy evidence. | For consistency with evidence base work (GBI) | yes | 112 |

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|---|--|---------------------------------|---|---|--|---|
| Change 'River Kerr ' to 'River Keer' | Part 1 Policy SC4 | EH | To amend typo brought to our attention in AONB Regulation 18 consultation response | Editorial change for clarification purposes | yes | 113 |
| The Council will investigate opportunities to improve and enhance New developments will be expected to contribute, where appropriate, to improving and enhancing the multifunctionality and connectivity within these networks corridors and chains, including the assets which contribute to them (such as river tributaries) and the linkages between them, and demonstrate how this would contribute towards climate change adaptation and/or mitigation, as set out in Appendix 7 of the Lancaster District Green & Blue Infrastructure Strategy. | Part 1 Policy SC4 | FC and EH | In response to rep at reg 18 consultation. To ensure that the policy addresses all elements which contribute to these GBI corridors and chains (i.e. river Lune corridor is doesn't exist without the tributaries) | Editorial change for clarification purposes | yes | 114 |
| There are a number of green and blue space networks corridors and chains across the District which contribute towards the wider Lancaster District green and blue infrastructure network, as set out in the Lancaster District Green and Blue Infrastructure Strategy. Ans recreational open spaces systems. These can form chains of These corridors and chains are made up of green and blue spaces such as registered parks and gardens, school playing fields, dedicated cycle and pedestrian routes, watercourses, the canal , canal towpaths, allotments, community growing spaces, orchards and private open spaces. The linkages between these corridors and chains and the contributions that individual green and blue assets make towards them need to be carefully considered. For example, in terms of a river, it is the whole river system which is made up of individual tributaries that provides the corridor. It is recognised that the list of green and blue infrastructure corridors and chains identified in policy SC4 is not exhaustive because... (after list of criteria insert) The purpose of policy SC4 is to provide a spatial indication and recognition of the key strategic green and blue corridors and chains within our District. | Part 1 Policy SC4 Supporting text | FC and EH | In response to comment 014a/11. To ensure that the policy addresses all elements which contribute to these GBI corridors and chains. (i.e. river Lune corridor is doesn't exist without the tributaries). Final sentence in response to comments raised by CPRE on behalf of Lancaster University seeking clarification on role of policy SC4. | Editorial change for clarification purposes | yes | 115 |
| Detailed changes to DM45 and supporting text set out in Appendix 2 below this table. | Part 2 Policy DM45 policy and supporting text | SL and EH | To provide better protection for the retention of existing trees post development, due to increase in tree removal applications | Trees play an important role in climate change mitigation, (carbon stores, air quality mitigation etc.) especially well- established trees and particularly within urban environments where they are most under | yes | 116 |

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|---|---|---------------------------------|--|---|--|---|
| | | | following development completions and occupation. Also, to ensure new trees consider this and potential impact existing trees may have on development in the future when designing proposals to minimise unavoidable losses (referred to since Also, includes reference to street trees as per revised NPPF. | pressure from development. We need to ensure planning policy is as strong as possible in protecting these trees and ensuring there is a presumption in favour of their retention. | | |
| All the footnote links need to be checked and amended if necessary prior to Publication. | Part 1 and Part 2 | RR | editorial change for clarification purposes | editorial change for clarification purposes | Yes | 117 |
| <p>Para 11.8 (new text in blue)</p> <p>Once created, it is important to ensure that green and blue infrastructure assets are managed and maintained so that they continue to effectively deliver the long-term uses and benefits that they were designed to provide. Therefore, a Green and Blue Infrastructure (GBI) Management and Maintenance Plan will be required. This will need to include long-term design objectives, a detailed maintenance schedule, clearly defined management responsibilities and set out the appropriate funding mechanisms that will be put in place to provide for the on-going maintenance of green and blue infrastructure delivered as part of the development. The Green and Blue Infrastructure Management and Maintenance Plan should relate to all green and blue infrastructure that is not within private gardens, incorporating each of the six key uses of GBI, where appropriate. Further detail in relation to the approach towards blue infrastructure is included in policy DM34, the accompanying text and the Flood Risk and Sustainable Drainage SPD and further information about landscaping is set out in policy DM45 and the accompanying text. In relation to blue infrastructure, to avoid duplication and where appropriate, this Plan should cross-reference the Surface Water Lifetime Management and Maintenance Plan that is required to ensure SuDS provide long term drainage solutions and continue to address flooding.</p> | Part 2 Policy DM43 supporting text para 11.8 | EH | To align with changes proposed to DM45 r.e. long-term management and maintenance of landscaping. Also to re-emphasise that GBI Management and Maintenance Plan should address all 6 key themes where appropriate (i.e. not just all about landscaping) | The long-term management and maintenance of GBI assets is important to ensure they continue to deliver the benefits/multifunctional value that these assets were designed to achieve | yes | 118 |
| <p>Para 21.14 to read as follows:</p> <p>Cycle and walking paths should, wherever possible, be segregated. This should be done in accordance with the guidance set out within LTN1/20 (Section 6). In the first instance this is segregation from general traffic and secondly LTN 1/20 promotes segregation between cyclists and walkers in order to minimise conflict between users. At locations with slower cycle speeds, shared spaces may be appropriate. Cycle and walking paths should, where applicable, also be designed and improved to ensure they are usable by all, including those with disabilities. (See Section 6 of LTN 1/20). Similarly, supporting infrastructure such as signalised crossings should be appropriately designed for those with physical impairments.</p> | Part 1 Policy T2 supporting text para 21.14 | RC | In response to representation received at reg 18 Provide more detail on segregation. | Supports policy aimed at reducing car journeys. | yes | 119 |

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|--|---|---------------------------------|--|---|--|---|
| | | | | | | |
| Figure 24.1 Inset map to be included to show network in/around Lancaster City Centre Wyresdale Road allocations removed from map as they are not 'Strategic' as identified in legend. See map at Appendix 3 below -Updated Figure 24.1: A map showing the strategic cycling and walking networks across the District. It highlights the existing networks and aspirational extensions of the network | Part 1 Policy T2 Map | RC | In response to rep received at Reg 18 Inset map will provide clarity on Lancaster city centre | Supports policy aimed at reducing car journeys | yes | 120 |
| Amend policy wording Developments that generate significant levels of traffic movements should be supported by frequent high quality public transport linking them to Lancaster City Centre or other key destinations, such as the main urban centres and employment areas. Where there are deficiencies in existing services. Developers will be required to ensure the provision of such new services or enhanced existing services, as necessary, from first occupation of the development for a period of up to 10 years, or five years after last occupation, whichever comes sooner. Developers will be required to fund the provision of such new services or enhanced existing services. The commencement of such services and the duration of support will be considered on a case by case basis. For all development, public transport services should be within reasonable safe walking and cycling travel distance of all parts of the development. Secure cycle parking should be provided at public transport hubs | Part 1 Policy T4 policy wording | RC | In response rep received at reg 18 and others. Viability issues to do with the 10yrs funding contribution. Change is a step back from existing wording in terms of securing enhanced bus services and reducing car journeys but significant viability issues are anticipated. However, amended wording provides greater clarity on support for bus services than in the adopted Local Plan. | Ensures clarity over position on terms of sustainable transport aims. | yes | 121 |
| Following text to be added to para 9.13 It is important to recognise that light pollution not only has impacts on local amenity but also on carbon emissions in terms of energy use and on nocturnal ecology. The forthcoming Sustainable Design SPD will consider impacts of light pollution further. | Part 2 Policy DM29 para 9.13 | RC | In response to rep received at Reg 18 consultation. To highlight impacts of light pollution | Potentially reduce carbon emissions from light pollution | yes | 122 |
| Amend policy wording Where garage provision is to be provided, these should be of a sufficient size to be genuinely used by a car and should include an internal space of at least 6 metres long by 3 metres wide that can also accommodate cycle storage appropriate for the dwelling size (see Appendix E). | Part 2 Policy DM62 policy wording | RC | In response to rep received at Reg 18 consultation. and others. No intention to require larger garages to accommodate cycles. Remove wording to clarify | Change made for clarification. | yes | 123 |
| Amend policy wording | Part 2 | RC | In response to rep received at Reg 18 | Factual correction | yes | 124 |

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|---|---|---------------------------------|---|---|--|---|
| <ul style="list-style-type: none"> Establishing a new Rapid Transit System between South Lancaster – Lancaster City Centre – Junction 34 Park and Ride – Morecambe – Heysham. - Morecambe - Heysham | Policy DM64 policy wording | | consultation... Factual correction. Although the County Councils aspirations have changed to 'Better Buses' the Policy refers back to published Masterplan which includes 'Morecambe and Heysham | | | |
| <p>Amend para 9.5</p> <p>The Council recognises the importance that private garden space can provide, both to the health and well-being of residents but also the benefits that it can provide to the natural environment, particularly in urban locations. In developing this approach, the Council has been mindful of the Glasgow Food and Climate Change Declaration, which LCC signed up to in November 2021. The following levels of provision will be encouraged expected:</p> <p><i>footnote for deceleration will read THE GLASGOW DECLARATION Glasgowdeclaration</i></p> | Part 2 Policy DM29 para 9.5 | DN | Reference added to Glasgow Food and Climate Change deceleration signed dup to by the Council | To highlight the important role that food has in addressing climate change and the recent progress made at COP26 which the Council has signed up to. | yes | 125 |
| <p>Amend policy wording</p> <p>II. An assessment has been undertaken to demonstrate that it no longer has an economic, environmental environmental or community value, which shall be evidence based and include consultation with key stakeholders and the local community;</p> | Part 2 Policy DM27 policy wording | SD | In response to consultation response rep received at Reg 18 consultation. | Includes/maintains mitigation potential and adaptation value of GBI. Helps to ensure loss/damage to GBI quality and quantity. | yes | 126 |
| <p>Amend policy wording</p> <p>The Council will continue to work with all relevant partners, stakeholders and communities to address issues of flood risk, whether from river, sea or other sources, to implement schemes that will reduce overall flood risk or better manage the continuing effects of Climate Change. Development proposals in areas of known flood risk will be expected to consider their direct and indirect impacts on flooding and include appropriate mitigation measures to ensure water is managed correctly</p> | Part 1 Policy SP8 policy wording | SD | In response to consultation response rep received at Reg 18 consultation. | Inclusion will help to increase adaptation potential and local resilience. | yes | 127 |
| <p>Amend Policy text:</p> <p>Thermal Energy Distribution: District Heating and Cooling Networks</p> <p>The Council will support proposals for, and encourage the inclusion of, heating and cooling distribution networks, providing they are in conformity with Local Plan policies.</p> <p>Where feasible, new major development should connect to existing networks, or provide new networks. It is expected that networks:</p> <ul style="list-style-type: none"> Connect to an existing or new/purpose-built district heating/cooling network; Are designed for cost effective future connection to a proposed or planned network; | Part 2 Policy DM53 policy wording | SD | To improve text in line with language in forthcoming national guidance/regulations. | Change made for clarification. | yes | 128 |

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|---|---|---------------------------------|---|--|--|---|
| <ul style="list-style-type: none"> • Employ individual or communal sustainable, renewable, or low carbon heating and/or cooling; • Make use of ambient or secondary heat sources (in conjunction with heat pumps where required); • Demonstrate compliance with appropriate technical standards (currently CIBSE's Heat Networks Code of Practice for the UK); • Be registered with the Heat Trust; • Use renewable and/or low carbon sources for their energy centre or provide an evidenced timeline and technology pathway towards system decarbonisation by 2030; • Provide heat and/or cooling services at a fair and affordable price; and • Where refrigerants are to be used, the global warming potential should be taken into account. <p>The requirements of this policy are to be evidenced in a Sustainable Design Statement to be submitted with the planning application.</p> | | | | | | |
| <p>Amend text</p> <p>13.5 District Heating and cooling networks are supported through funding through the BEIS and the Heat Network Delivery Unit and anticipated new funding under the Green Heat Network Fund. The Government is also consulting on Heat Network Zoning which builds on commitments in the Energy White paper of 2020. This will enable Local Authorities to designate new heat network zones, no later than 2025. This process entails the identification of areas which can be readily connected to a low-carbon heat network and mandating connection unless it is not cost-effective to do so. The Council are supportive of renewables and low carbon thermal energy technologies and distribution networks, in line with the Government's ambitions</p> | Part 2 Policy DM53 paragraph 13.5 | SD | To improve text in line with language in forthcoming national guidance/regulations. | Change made for clarification. | yes | 129 |
| <p>Amend policy wording</p> <p>All development will should take opportunities to integrate the principles of sustainable design and construction into the design of proposals.</p> | Part 1 – Policy CC1 | SD | In response to consultation response rep received at Reg 18 consultation. | Changes will ensure that climate adaptation and mitigation are central to design and development proposals rather than being added on as an aside to proposals. | yes | 130 |
| <p>Amend policy wording</p> <ul style="list-style-type: none"> • Supporting sustainable economic growth in the rural economy to ensure that the needs of rural businesses can be supported. • Supporting the local food supply chain and local food systems including its skills, jobs, non-profits, education, infrastructure, land, transportation, and communities. Particularly supporting agroecological food systems and the importance local food supply chains have in addressing food poverty, addressing climate adaptation and mitigation, and supporting community resilience. • Supporting the delivery of a skilled workforce through the promotion of apprenticeships and training, particularly focusing on promoting the skills and experience necessary to drive forward the construction of low-carbon and energy efficient homes and buildings. | Part 1 - amend policy SP4 policy wording | SD | In response to consultation response rep received at Reg 18 consultation. | Recognising the key role that local food supply chains have in local economic prosperity, will impact on climate adaptation for food supply chains and climate mitigation particularly through reduced food miles. | yes | 131 |
| <p>Amend typo</p> <p>6.5 The declaration of a Climate Emergency has led to increased consideration of climate change issues and how the climate emergency declaration outputs will be met. The detail of the Climate Emergency Local Plan Review ensures that Climate Change is at the heart of decision making in the District with Policy CC1 considered in assessing all proposals.</p> | Part 1 CC1 Paragraph 6.5 | SD | To correct a typo error. | Typo corrected. | yes | 132 |

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|--|---|---------------------------------|---|---|--|---|
| <p>Amend policy wording</p> <ul style="list-style-type: none"> • Enhancements to Green and Blue infrastructure Networks, both within and connecting to, Lancaster City Centre; • Improve local food supply chains and local food systems particularly aimed at reducing the climate and environmental impact of food and drink choices of local residents and visitors; • Improve the City Centre environment, particularly in relation to Air Quality, through the reduction in traffic movements using the City Centre Gyratory road system and prioritising more sustainable forms of transport; | Part 1 – amend policy SG4 policy wording SG4 | SD | In response to consultation response rep received at Reg 18 consultation. | Recognising the key role that local food supply chains have in food provisioning in the city centre, will impact on climate adaptation for food supply chains and climate mitigation particularly through reduced food miles. | yes | 133 |
| <p>Amend paragraph 9.38</p> <p>PassivHaus</p> <p>Where proposals which seek to follow the PassivHaus route to meeting the requirements set out in DM30a are proposed, a full Energy Statement will not be required. It will be sufficient to submit the technical information required to demonstrate that the PassivHaus standard can be achieved. Prior to commencement a ‘pre-construction compliance check’ completed by a PassivHaus certifier will be required and secured by condition. Upon completion, a Quality Approved PassivHaus certificate for each dwelling/building will be required. EmerPHit certification from the PassivHaus Trust may be used for applicable conversions and significant retrofit projects.</p> | Part 2 - paragraph 9.38 | SD | In response to consultation response rep received at Reg 18 consultation. | Provides a certification pathway for converted buildings impacting climate mitigation. | yes | 134 |
| <p>Amend policy wording</p> <p>New development should be resilient to Climate Change. Through its design, construction and occupation phases, a developments’ ability to mitigate and adapt to the impacts of Climate Change should be the golden thread which results in the delivery of low-carbon, energy efficient homes, community and commercial spaces which can withstand the challenges of our changing climate.</p> | Part 1 – Policy SP9 policy wording | SD | In response to consultation response rep received at Reg 18 consultation. | Recognises a wider range of development which is central to climate mitigation and adaptation and supports community climate resilience. | yes | 135 |
| <p>New supporting text</p> <p>The Council is supportive of increasing decentralised renewable and low carbon energy across the district. A key element of this will be in increasing battery storage capacity to support the renewable transition, making best use of local energy resources, and supporting grid modernisation. Battery storage includes any mechanical, chemical, or thermal process which will be used to store electric or thermal energy generated at one time which is then used at a later time. While battery storage systems are seen as key to a low carbon energy future, they come with inherent risks which must be mitigated. Their location and construction should include consideration to proximity to people, urban, residential and recreation areas, workers access, areas of sensitive environments and habitats, and proximity to critical assets and services. This is in light of the fire and explosion risk battery storage facilities present and the risk that the smoke can have on the firefighting personal as well as environmental and human receptors. The fires and explosions can also have significant impact on firefighting capacity as well as result in hazardous or toxic gasses, solid, and liquid waste. This means that developments must plan for site failure and clean up and be in dialogue with the local authority and relevant stakeholders. Battery storage facilities must also prepare for any other site failure that could result in a loss of hazardous or toxic material from the instalment and provide failure and clean-up plans. Battery storage facilities must also have plans for decommissioning of the site due to the hazardous and toxic nature of the materials used in many battery systems. This decommissioning plan must be kept current, be backed by a regularly reviewed decommissioning fund, and ensure that all waste from the site is properly disposed of and that the responsibility of clean up does not fall onto the landowner, local authority, or community. Ensuring that the</p> | Part 2 DM53 Insert after para 13.4 | SD | Recognises removal of battery storage facilities under 1GW installed and 4GW in planning from NSIP regime and approval to be at local, not Secretary of State, level. | Increased local battery storage will help to transition to decentralised renewable energy generation and distribution thus improving local climate mitigation potential. | yes | 136 |

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|--|--|---------------------------------|---|---|--|---|
| safety issues of the facilities is addressed is critical for making sure that growth in the battery storage market is secured. | | | | | | |
| <p>Amend paragraph 1.2</p> <p>The Local Plan is prepared in the context of national planning guidance provided by the Government. In March 2012, the National Planning Policy Framework (the Framework)¹² was published, which replaced the guidance in Planning Policy Statements (PPS) and Planning Policy Guidance (PPG) and Planning Policy Guidance Notes (PPG). The aim of the Framework is to provide a more concise and easy to understand approach to the planning system, and to deliver sustainable development. This was subsequently replaced by the 2019 version of the NPPF. The adopted Local Plan has been produced in compliance with this Framework. The NPPF was first published on 27 March 2012 and updated on 24 July 2018, 19 February 2019 and 20 July 2021. This report relies upon the 2021 version of the NPPF. Therefore, all subsequent references to the NPPF in this report are references to the 2021 version, where previous versions of the NPPF are referred to this will be made clear.</p> | Part 2 – replace final sentence of blue text at end of para 1.2 with the suggested text. | DN | To ensure understanding of compliance with the changes to the NPPF since the Local Plan was adopted and how this has impacted the partial review process. | N/A – editorial change for clarification purposes | yes | 137 |
| <p>Amend DM30c as follows</p> <p>Proposals for major developments should demonstrate how they achieve sustainable and environmentally conscious development, including climate change mitigation and adaptation, taking into account the following principles:</p> <p><u>Materials, and Waste and construction</u></p> <ol style="list-style-type: none"> Materials that arise through demolition and refurbishment are reused and recycled wherever possible, including the reuse of excavated soil and hardcore within the site; Proposals for major development must set out how site waste will be managed through the construction phase; must be accompanied by a site waste management plan setting out how site waste will be managed during the construction phase; The full lifecycle of the building from concept to demolition (and how demolition materials can be used), alongside lifecycle emissions and environmental pollutants, must be considered; | Part t DM30c. Changes to end of first sentence and point (2) | DN | In response to consultation response rep received at Reg 18 consultation. | N/A – editorial change for clarification purposes | Yes | 138 |
| <p>Changes to POLICY CC1: RESPONDING TO CLIMATE CHANGE AND CREATING ENVIRONMENTAL SUSTAINABILITY</p> <p>The Local Plan ensures that Lancaster District achieves its social, economic and environmental aspirations, in pursuing sustainable development. Sustainable development is the accomplishment of environmental protection and improvement, climate change mitigation and adaptation, maximised wellbeing and economic</p> | Part 1 Policy CC1 | DN | In response to consultation response rep received at Reg 18 consultation. | N/A – editorial change for clarification purposes | Yes | 139 |

¹² National Planning Policy Framework (DCLG 2012)

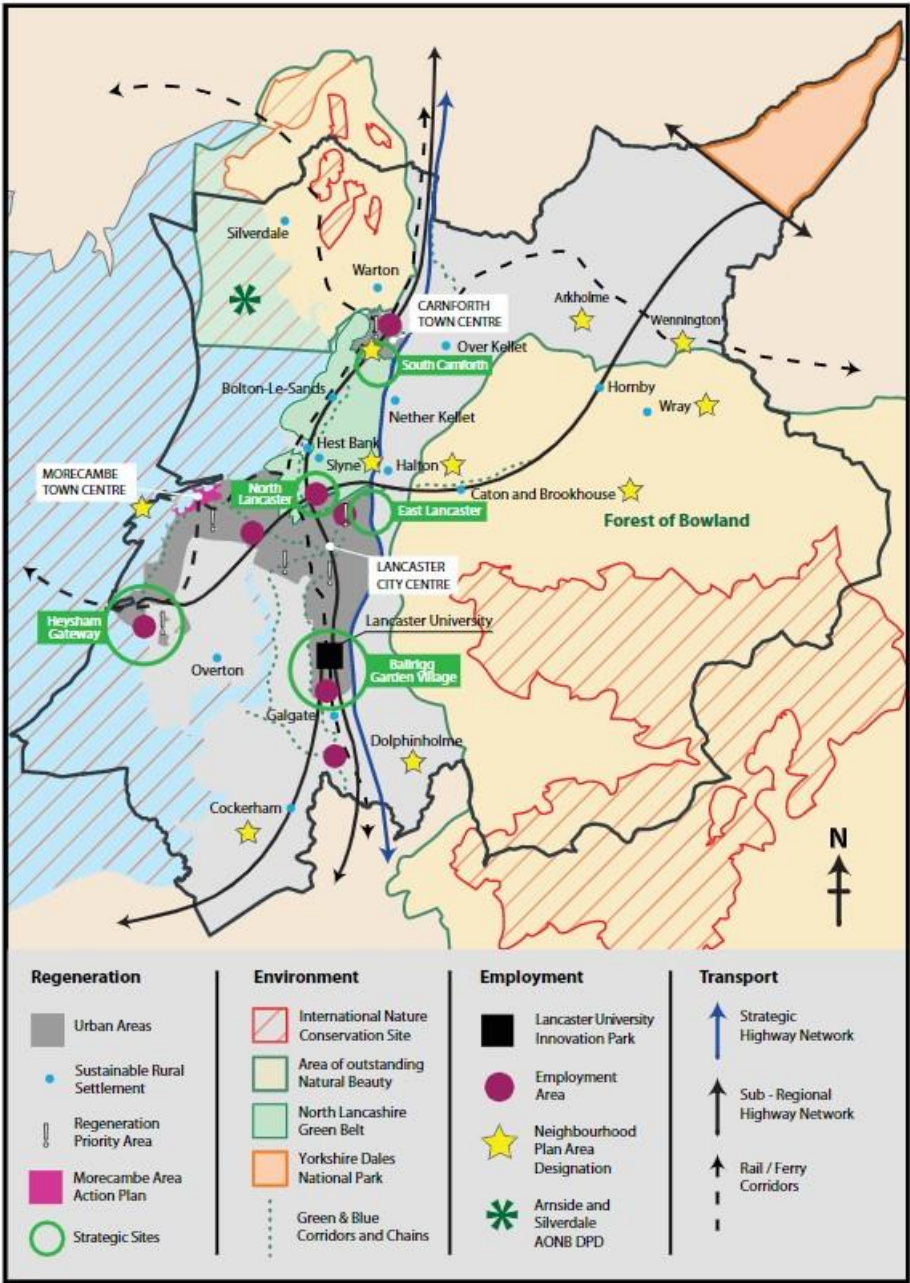
<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|--|---|---------------------------------|---|---|--|---|
| <p>prosperity, without negatively impacting the ability of future generations to do the same.</p> <p>Lancaster District will become a low carbon, water sensitive district with a thriving economy, where development is considerate of its natural, historic and cultural assets, through taking a holistic approach to sustainable development, which will protect and preserve the District for generations to come. To achieve this, appropriate concern mitigation for the environmental and climatic impacts of development should be embedded within all development proposals from the outset.</p> <p>All development will should take opportunities to integrate the principles of sustainable design and construction into the design of proposals.</p> <p>In response to the climate emergency declaration made by Lancaster City Council, the content of this Plan Review will aim to assist in the Council's ambitions towards a reduction of carbon emissions to net zero by 2030. This Plan will support those ambitions by ensuring:</p> <ol style="list-style-type: none"> 1. Ensuring tThat new and existing development minimise emissions and maximise the use of renewable energy and resources; 2. Ensuring tThat new development mitigates emissions and lessens the effects of climate change through incorporating measures which provide climate change adaptation and increased climate resilience; 3. That development maximises Maximising opportunities to encourage a modal shift in transportation from private car use to accessible active travel and sustainable transport through considered design; 4. That development contributes Contributing positively to environmental gain by improving the connectivity and multi-functionality of the Green and Blue network in the District, protecting habitats and ecosystems, strengthening nature recovery networks, and ensuring biodiversity net gain; 5. That the importance of Recognising the importance of the use of recycled and low embodied energy materials is recognised; and 6. Improving or maintaining That the natural functioning of river processes are improved or maintained, avoiding placing development in areas at risk of flooding and ensuring new development contributes to reducing flood risk on and off site, and 7. That development recognises Recognising the important role that the district's soils provide in mitigating climate change through carbon storage and sequestration. <p>Development proposals that otherwise accord with the policies of the development plan will be supported in principle where they can demonstrate that they have incorporated relevant climate mitigation and adaptation measures into their schemes and address the impacts of climate change.</p> | | | | | | |
| <p>Add additional bullet point to end of SP4 list of bullet points as follows:</p> <p>To support transition to a low carbon economy, supporting major renewable energy projects in appropriate locations and where they do not conflict with other policies in the Local Plan.</p> | Part 1 Policy SP4 | PH | In response to consultation response rep received at Reg 18 consultation. | Ensures that climate change impacts and a low carbon economy is adequately considered within the Local Plan and ensure that support for renewable energy projects is made clear. | Yes | 140 |

| Change made to DPD | Part 1 or Part 2? Page number/ section etc. | Officer suggesting change | Reason for change | What are the climate change mitigation and/or adaption impacts of the change? (i.e. demonstrate how the proposed changes to the plan make CC Adaption/mitigation better) | Change made in Reg 19 doc? Y/N | Table list change number (for internal referencing use only) |
|--|---|---------------------------------|--|---|--|---|
| <p><i>Add in text to para 5.15 (supporting text to DM15) as follows</i></p> <p>will seek to encourage the sustainable growth of new businesses and emerging economic sectors particularly the opportunities in the green economy and created by implementing the council's climate emergency policies in both urban and rural locations.</p> | Part 2 Para 5.15 | PH | In response to consultation response rep received at Reg 18 consultation. | More appropriately considers opportunities in relation to the green economy. | Yes | 141 |
| <p>At the end of paragraph D.7 new wording to be added: which should be used in conjunction with the Sport England Playing Pitch calculator or future successor calculators/tools.</p> <p>Beneath Table D.3 please could the following wording be added: In relation to the delivery of playing pitches and outdoor sports facilities, early engagement with the Council's Public Realm Team should be sought to discuss the requirements to meet the level of demand, utilising the Playing Pitch and Outdoor Sports Strategy in conjunction with Sport England Playing Pitch calculator or future successor calculators/tools.</p> | Part 2 Appendix D | EH | For clarity to make clear that Playing Pitch Strategy calculator is to be used alongside the Playing Pitch Strategy. | N/A – editorial change for clarification purposes | Yes | 142 |
| <p>Amend text at 9.2 (above policy DM29)</p> <p>This provides additional guidance on the key design principles that the council will look to apply to residential proposals.</p> | Para 9.2 | FC | In response to consultation response rep received at Reg 18 consultation. | N/A – editorial change for clarification purposes | Yes | 143 |

Appendix 1- Key Diagram update

- ~~Key Greenspace Network~~ to be replaced with Green & Blue Corridors and Chains.



Trees and Woodland –

POLICY DM45: PROTECTION OF TREES, HEDGEROWS AND WOODLAND

Protection of Trees, Hedgerows and Woodland

~~The~~ There is a presumption in favour of the retention of existing trees and the Council will ~~support~~ expect individual trees, groups, woodlands and hedgerows to be conserved and enhanced where they ~~the protection of trees and hedgerows that~~ positively contribute, ~~either as individual specimens or as part of a wider group,~~ to the visual amenity, landscape character and/or environmental ~~and climate mitigation and adaptation~~ value of the location.

The Council will also protect ancient, ~~veteran~~ trees, ~~and~~ ancient woodland, ~~and important hedgerows,~~ supporting opportunities which increase the resilience of all woodlands, ~~trees and hedgerows~~ to climate change, pests and diseases.

New development should positively incorporate existing trees and hedgerows, ~~and street trees where possible.~~ Buildings and other structures should be sited allowing adequate space for a tree's natural development, with due consideration given to its predicted height and canopy spread.

Where ~~this~~ existing trees and hedgerows cannot be ~~positively incorporated into new development achieved~~ the onus is on the applicant to justify the loss of trees and hedgerows as part of their Arboricultural ~~Implications~~ Impact Assessment (AIA – further guidance as to the content of such an assessment is provided within the Council's Planning Applications Validation Guide). Where the loss is adequately justified the Council will seek replacement tree planting at the ratios adopted in the Council's Tree Policy (2010), or successor documents.

Encouraging ~~Providing~~ Tree and Hedgerow Cover

The Council will expect ~~appropriate opportunities to encourage~~ the planting of new trees, street trees, hedgerows and woodland ~~to take place where appropriate,~~ planting the right tree in the right place ~~making use of indigenous species,~~ throughout the district, including plans for their long-term maintenance as part of the Green and Blue Infrastructure Management and Maintenance Plan. New tree planting will be encouraged to ensure no net loss in biodiversity, ~~in an effort to~~ mitigate against the impacts of Climate Change, enhance the existing character and appearance of the district, and positively integrate development into the local landscape, creating a space for people and wildlife. ~~and to enhance the character and appearance of the district, and to positively contribute towards the landscaping of the site and enhancement of the local character.~~

- 11.3 The district has many fine examples of important and significant trees, which may be defined as trees that are ancient, of veteran status, of historic importance or rare. Trees are also a wildlife resource and are notable for their contribution to the landscape character and visual amenity of an area. The Council will actively seek to protect these significant trees from development that would involve their loss or harm. The protection of

significant trees has many benefits economically, socially and environmentally including their contribution to the reduction in atmospheric carbon dioxide levels and mitigation of climate change.

- 11.4 The majority of trees within the district are not protected by Tree Preservation Orders (TPOs) or located within designated Conservation Areas. However, this does not mean that non-designated trees are not considered to be significant and worthy of protection from loss or harm.
- 11.5 Development proposals should incorporate existing and notable features, such as significant trees within their proposals. The retention of existing trees can assist in providing context and character to a development and ensure that the proposals respect the character and value of the surrounding landscape and townscape. The Council will resist the loss of trees within development proposals, particularly where it can be demonstrated that appropriate alternative design solutions exist that can allow for retention and incorporation of such features into the overall design of a new development.
- 11.6 **There is a presumption in favour of the retention of existing trees and** the Council will **expect support** the retention of existing trees within development proposals. However, where it is adequately demonstrated that retention is not possible or feasible to achieve, and the loss does not involve trees that are of significant value, then consideration will be given to whether suitable mitigation measures would compensate for the losses sustained. In making this assessment, the Council will have regard to the provision of its Tree Policy¹³, adopted in 2010, and the replanting ratios contained therein.
- 11.7 Any development proposals that have implications for existing trees must be accompanied by an Arboricultural **Implications Impact** Assessment, which should set out the potential impacts and implications for existing trees that may arise from a development proposal. The assessment must also include measures to protect trees and provide appropriate mitigation measures.
- 11.8 **In accordance with the British Standard “Trees in Relation to Design, Demolition and Construction – Recommendations’ (BS 5837) (2012), a realistic assessment of the probable impact of any proposed development on the trees and vice versa should take into account the characteristics and condition of the trees, with due allowance and space for their future growth and maintenance requirements. The objective for the retention of existing trees within development is to ensure that they represent a welcome amenity for residents and occupants rather than being perceived negatively. Developers are strongly advised to properly consider the implications of positively incorporating existing trees in site layouts before advancing development proposals. To maximise the probability of successful long-term tree retention following the occupation of development, the following factors should be taken into account during the design process: shading of buildings and open spaces, privacy and screening, direct damage, future pressure for removal and seasonal nuisance.**
- 11.9 **The Council’s register of applications and notices for work to trees in the two year period between September 2019 and September 2021 reveals that around 15% of all tree proposals, an average of around 40 per year, can be attributed to work to trees in completed development sites where the trees pre-dated development. The removal or reduction of trees at that annualised level over a longer period of time may have a cumulative effect, eroding arboreal cover and impacting on the landscape or townscape, most particularly in urban environments. Development that better accommodates trees in development at the design stage will result in fewer proposals to remove or reduce trees.**
- 11.10 Although a felling licence is not required from the Forestry Commission if full planning permission is granted, the Forestry Commission remain a non-statutory consultee on development that either directly affects or is within 500 metres of ancient woodland. Consent from the Forestry Commission may also be required under the Environmental Impact Assessment (Forestry) Regulations if the proposed development involves afforestation, deforestation, forest roads or forestry queries.

Hedgerows

- 11.11 Hedgerows contribute significantly to the natural environment and landscape character of an area and can provide important habitats for a range of species, provide shelter, and help reduce noise and atmospheric pollution. They add to the character and quality of the local environment and can have significant historic value. As with the protection of trees, these assets should be retained, **protected and enhanced**, through proposals incorporated into development schemes. Where possible, opportunities should also be sought to extend these valuable ecological networks by increasing and enhancing hedgerow cover.

Increasing Tree Coverage

- 11.12 Tree cover across the district was estimated to be approximately 6.9% in March 2010 (Woodland Trust) compared to 9.9% for England. Through the course of this plan period the Council will seek to increase the level of tree cover across the district in an effort to mitigate and adapt to the impacts of climate change **through initiatives such as the Council’s One Million Trees ambition. The Council is also preparing a District wide Tree Strategy, which will look to identify opportunities for tree planting.**
- 11.13 Whilst it is recognised that large portions of the district include upland areas the level of tree cover in the district is still significantly less than the national average. The Council will therefore explore opportunities for growth in the level of tree cover where appropriate locations exist. There will be many opportunities to achieve this. The increased provision of trees in new development, through suitable and appropriately designed landscaping schemes, is a key component of delivering growth in tree cover.
- 11.14 Development proposals will be encouraged and supported to incorporate trees, which should be at an appropriate scale, **and be the right tree in the right place, using the correct choice of tree species in relation to the**

¹³ <https://www.lancaster.gov.uk/planning/trees/tree-policy>

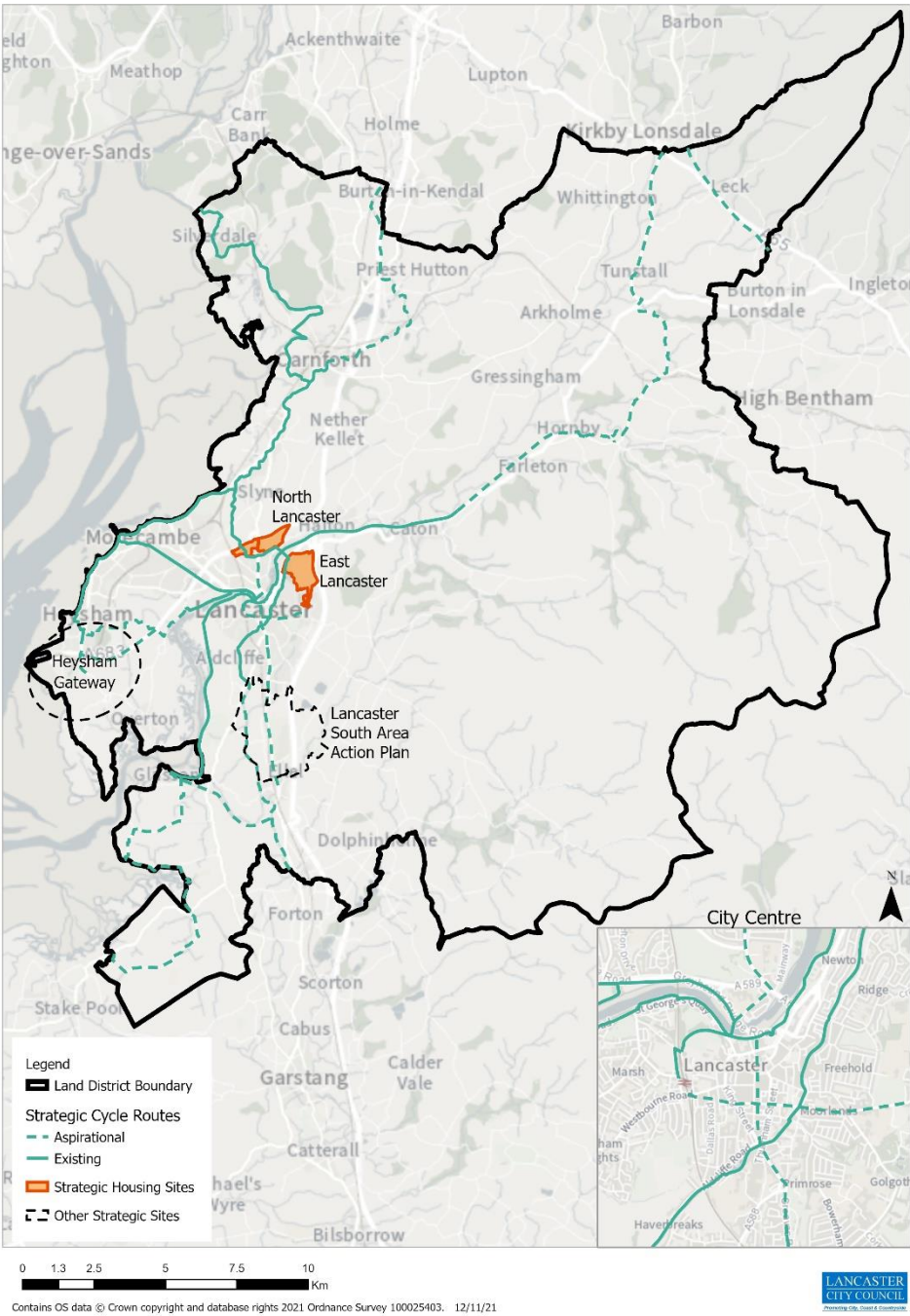
site characteristics be indigenous species and of local provenance. The inclusion of fresh tree planting will be considered in relation to the impact it will have on the surrounding character and landscape. ~~This guidance is in addition to the operation of an existing Tree Sponsorship Scheme.~~

- 11.15 In accordance with the British Standard “Trees in Relation to Design, Demolition and Construction – Recommendations’ (BS 5837) (2012), the obstruction of light and views, the creation of shade by new trees, and the likely extent and density of tree crowns when fully grown, should be taken into account when designing new planting adjacent to development. Design and species selection should allow the enjoyment of reasonable light and shading where desirable as the trees develop into mature specimens. An appropriate balance of views and screening should be provided. The planting of large and/or fast-growing evergreen trees as screens or hedging could lead to the unacceptable obstruction of light all year round and might therefore be unsuited to nearby residential accommodation.

Long-term Management and Maintenance

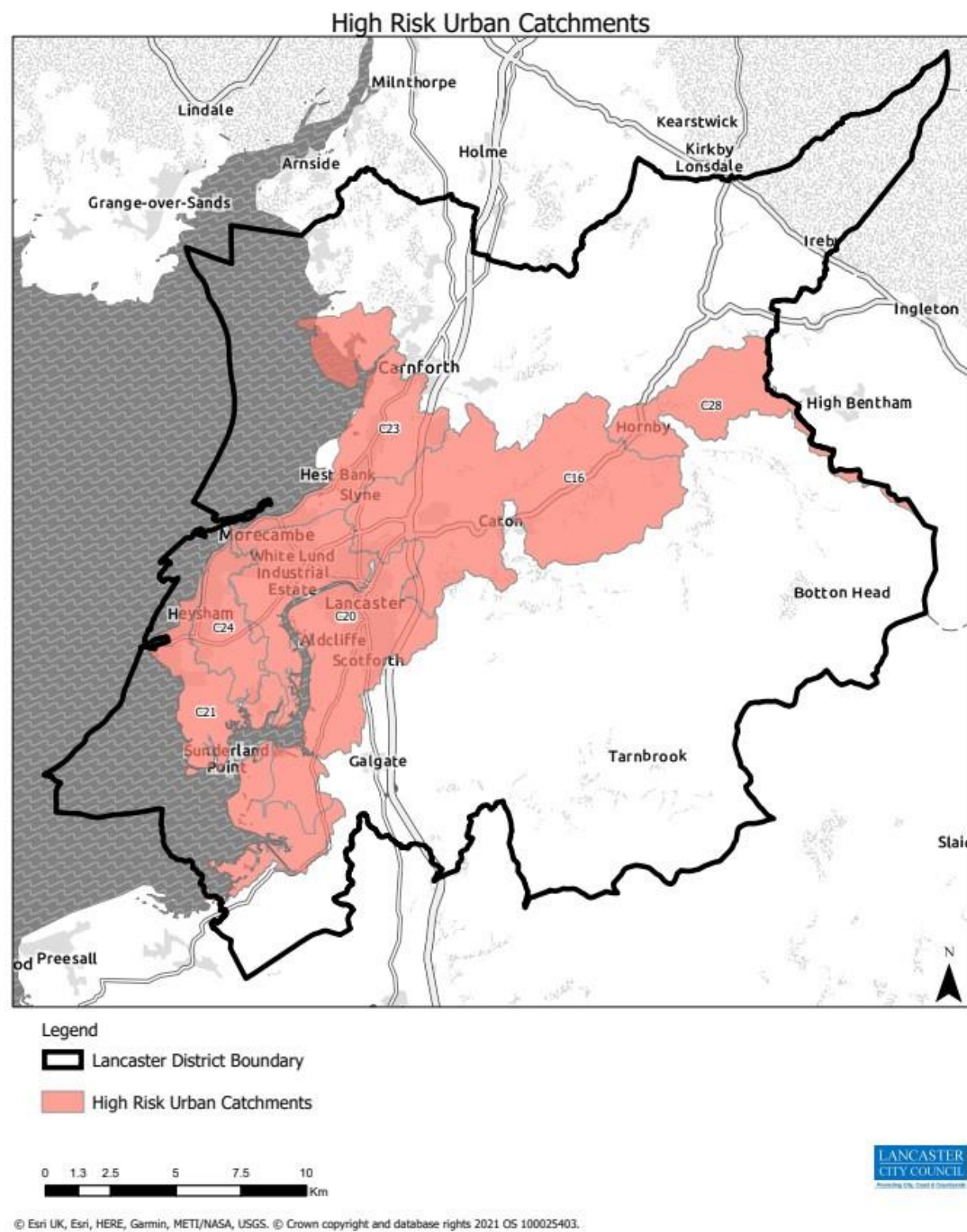
- 11.16 To ensure that all green infrastructure assets, new and existing, continue to effectively deliver the long-term uses and benefits that they were designed to provide, a Green and Blue Infrastructure Management and Maintenance Plan should be submitted, detailing how this will be achieved. The green infrastructure element should be produced in accordance with the requirements set out as part of policy DM43. Specifically in terms of landscaping, the GBI Management and Maintenance Plan must include (and not rely on additional information):
- A clearly stated management plan period and review dates.
 - A statement of the overall design vision, aims, objectives, scope of the document.
 - A site description and location.
 - Include and make reference to the landscape plans. Each landscape element should be clearly identified and cross referenced in the plan; for example hedgerows, woodland planting and understory, individual trees/shrubs, grass and herb layers.
 - Management operations must be displayed on a Gant style chart clearly showing year by year operations, including:
 - Watering in drought periods
 - Weed control, maintenance of mulch
 - Inspection and replacement of dead/damaged planting stock
 - Inspection of trees, ties, stakes and guards, protective fencing and ultimate removal
 - Inspection for pests and diseases and remedial action
 - Formative pruning
 - Thinning woodland planting
 - Hedge cutting, frequency and ultimate height
 - Removal of litter
 - Details of management operations for all other soft landscaping features such as shrub mixes, grassed areas and wildflower meadows, and hard landscaping features such as boundary features, surfacing, street furniture and play equipment (open space management and maintenance arrangements to be agreed with Council’s Public Realm department), must also be detailed
 - Review/redesign of failed areas of hard and soft landscaping
 - Management of existing habitat, trees, woodlands, and hedgerows, regular inspection (details of TPO/CA consent, if relevant). Is a separate woodland management plan required, or existing which can be cross referenced.
 - A description of who will carry out the management/maintenance and the funding mechanism.

Appendix 3- Updated Figure 24.1: A map showing the strategic cycling and walking networks across the District. It highlights the existing networks and aspirational extensions of the network



Appendix 4- High Risk Urban Catchment Map

To be inserted as *Figure 9.2: High Risk Urban Catchments Map (SFRA 2021)*



Appendix 5- Amended CELPR Monitoring Framework

| Strategic Objective | Sub-objectives | Policies | Indicators | Targets | Trigger | Proposed action for target not being met |
|---|--|--|---|--|---|---|
| SO1: Delivery of a thriving local economy that fosters investment and growth and supports the opportunities to deliver the economic potential of the district | Retaining existing jobs and promote additional job creation to support a total of 54,000 FTE jobs by 2031, supporting better paid more satisfying and better-quality employment mix focused on the right sectors; | Strategic Policies & Land Allocations DPD: Policies SP4, SP5, SG1, SG2, SG4, SG5, SG6, SG9, SG12, SG13, SG14, EC1, EC2, EC3, EC4, EC5, EC6, EC7, TC1, TC3, TC4, DOS1, DOS2, DOS4, DOS6 & SC1. Development Management DPD: Policies DM14, DM15, DM16, DM28, DM58, DM59 & DM64. | <ul style="list-style-type: none"> • Total Employee Jobs (Full Time) – NOMIS • Total Employee Jobs (Part Time) – NOMIS • Full Time Employees – BRES • Part Time Employees - BRES | <ul style="list-style-type: none"> • The current number of full time employee jobs is 37,000, growth in full time Jobs of 10% during the course of the entire plan period. • The current number of part time employee jobs is 22,000, growth in the part time jobs number of 15% during the course of the entire plan period. • The number of full time Employees living within the district is 36,700, growth of full time employment of 10% during the course of the entire plan period. • The number of part time employees living in the district is 21,600, growth, of part time employment of 15% during the course of the entire plan period. | An identified loss of employment based on NOMIS figures which identify a decline in total employee jobs over 3 consecutive years. | Review of Employment Land evidence, including updating Experian Modelling Data to assess economic growth potential within the district. Subject to evidence there may be a need for a plan review. |
| | Capitalising on the district’s identification as a centre of excellence for knowledge led growth, exploiting future opportunities at Lancaster University, University of Cumbria and Lancaster University Health Innovation Campus; | Strategic Policies & Land Allocations DPD: Policies SP4, SP5, SG1, SG2, EC6 & EC7 Development Management DPD: Policies DM14, DM15, DM16 & DM28 | <ul style="list-style-type: none"> • Employment by Occupation – Major Group 1-3 including Professional Occupations, Associate Professional and Technical – NOMIS • Employee Jobs by Industry – M: Professional, Scientific and Technical Activities – NOMIS • Employee Jobs by Industry – P: Education - NOMIS | <ul style="list-style-type: none"> • The current level of employment in this occupational sector (Professional Occupations, Associate Professional and Technical) is 29,300 jobs, seek growth in this sector of 10% during the course of the entire plan period. • The current level of employment in this occupational sector (Professional, Scientific and Technical Activities) is 4,500 jobs, seek growth in this sector of at least 15% during the course of the entire plan period. • The current level of employment in this occupational sector (Education) is 10,000 jobs, seek growth in this sector of at least 5% during the course of the entire plan period. | An identified loss of employment based on NOMIS figures which identify a decline in total employee jobs over 3 consecutive years. | Liaise with Higher Education provides, consider greater flexibility in plan making, support establishments where sustainable growth can be achieved |
| | Developing the district’s role in the energy sector by utilising its expertise in the nuclear power and renewable energy industry and investment in energy infrastructure in south Heysham; | Strategic Policies & Land Allocations DPD: Policies CC1 SP4, SP5, SG12, SG13 & SG14 Development Management DPD: Policies DM14, DM15, DM16, DM28, DM30a , DM30c , DM58 & DM59 | <ul style="list-style-type: none"> • Employee Jobs by Industry – D: Electricity, Gas, Steam and Air Conditioning Supply – NOMIS • Applications approved for green energy related businesses in the District | <ul style="list-style-type: none"> • The current level of employment in the Electricity, Steam and Air Conditioning Supply sector is 1,250 jobs, seek growth in this sector of 150 jobs through the course of the entire plan period. • Net increase in green energy related business applications in the district over the entire plan period. | An identified loss of employment based on NOMIS figures which identify a decline in total employee jobs over 3 consecutive years. No completions over a 5 year period | Consider whether more alternative methods are available to encourage growth in this sector through liaison with energy providers. |
| | Capitalising on the accessibility of the district, maximising the opportunities provided by its location on the main strategic rail and road network and opportunities at the Port of Heysham | Strategic Policies & Land Allocations DPD: Policies SP10, SG1, SG5, SG12, T1, T2, T3 & T4. Development Management DPD: Policies DM28, DM60, DM61, DM62, DM63 & DM64. | Employee Jobs by Industry – H: Transportation and Storage – NOMIS | The current level of employment in the Transportation and Storage sector is 3,000 jobs, seek growth of 500 jobs through the course of the entire plan period. | An identified loss of employment based on NOMIS figures which identify a decline in total employee jobs over 3 consecutive years. | Continue to work with key stakeholders and transport providers to ensure that any obstacles to transport improvements and recognised and understood. |
| | Promoting the vitality, viability and accessibility of Lancaster City Centre capitalising on the heritage and cultural assets of the city to create a thriving destination for retail, culture and leisure activities, securing its role as a regional centre for North Lancashire and South Cumbria and the regeneration of the Lancaster Canal Quarter | Strategic Policies & Land Allocations DPD: Policies SP4, SP7, SG4, SG5, SG6, TC1, TC2, TC3, TC4, DOS1, EN1 SC4, SC5, T1 & T3. Development Management DPD: Policies DM16, DM17, DM20, DM21, DM22, DM23, DM24, DM25, DM26, DM37, DM38, DM39, DM40, DM41 & DM42. | <ul style="list-style-type: none"> • Employee Jobs by Industry – G: Wholesale and Retail Trade – NOMIS • Employee Jobs by Industry – I: Accommodation and Food Service Activities – NOMIS • Employee Jobs by Industry – R: Arts, Entertainment and Recreation - NOMIS | <ul style="list-style-type: none"> • The current level of employment in the Whole and Retail sector is 8,000 jobs, seek growth in this sector of 700 jobs through the course of the entire plan period. • The current level of employment in the Accommodation and Food Service sector is 5,000 jobs, seek growth in this sector of 500 jobs though course of the entire plan period. • The current level of employment in the Arts, Entertainment and Recreation sector is 1,000 jobs, seek growth in this sector of 100 jobs through the course of the entire plan period. | An identified loss of employment based on NOMIS figures which identify a decline in total employee jobs over 3 consecutive years. | Consider whether the approach taken to delivering improvements in the City Centre are flexible enough and consider the wider impacts of the town centre as a whole. Changes could be applied through the preparation of supplementary guidance where necessary. |
| | Promoting the historic and cultural centre of Lancaster, the coastal town of Morecambe, the Market Town of Carnforth and the rural areas of the district to boost visitor numbers in the district. | Strategic Policies & Land Allocations DPD: Policies SP4, SP7, TC1, TC2, TC3, TC4, DOS1, DOS6, EN1 & T3. | <ul style="list-style-type: none"> • Levels of Visitor Numbers attracted to the District. • Applications made for cultural and leisure facilities in main urban areas (Authority Monitoring Report). | Net increase of visitor numbers coming into the district on a year-on-year basis. | Failure to deliver the target over three year intervals | Consider improvements to marketing and promotion of the district. Liaise with local groups and stakeholders to ensure that assistance (where appropriate) can be given to |

| Strategic Objective | Sub-objectives | Policies | Indicators | Targets | Trigger | Proposed action for target not being met |
|---------------------|---|---|--|--|---|--|
| | | Development Management DPD: Policies DM22, DM23, DM24, DM25, DM26 & DM55. | | | | improving the cultural offer of the district. |
| | Maintaining the momentum of renewal in Morecambe to support the implementation of the Morecambe Area Action Plan and opportunities for investment and renewal in the West End; | Strategic Policies & Land Allocations DPD: Policies SP2, SP3, EC5, TC1, TC4, DOS6 & SC1. Development Management DPD: Policies DM1, DM2, DM3, DM15, DM16 & DM55 | Applications approved within the Morecambe Area Action Plan area which will provide economic benefit to the town in terms of job creation and boosting visitor numbers. | Net increase of visitor numbers visiting the town on a year-on-year basis. Net increase in approvals for regeneration led proposals within the Morecambe Area Action Plan and West End Regeneration Area. | Failure to deliver the target over three year intervals | Review of the Morecambe Area Action Plan at the end of its lifespan in 2021 to consider whether a further action plan is required. Review of the West End Masterplan. |
| | Support heritage-led regeneration in Carnforth and strengthen its role as an important Market Town | Strategic Policies & Land Allocations DPD: Policies SP2, SP3, SP8, TC1, DOS7, DOS8, SC1, SC5 & T3. Development Management DPD: Policies DM14, DM15, DM16, DM22, DM24, DM26 & DM55. | <ul style="list-style-type: none"> Applications approved for the re-use or regeneration of buildings within Carnforth Conservation Area (Employment Land Monitoring). Applications approved for main town centre uses within Carnforth Town Centre (Retail Monitoring). | Positive assessment through local Conservation Area Appraisal and Heritage Assessments. Net increase in approvals for regeneration led proposals within Carnforth town centre and conservation area. | Negative assessment through local Conservation Area Appraisal and Heritage Assessments. Continued inclusion on the Conservation Area at risk register. | Review of the Conservation Area Appraisal to ensure the important heritage assets are protected and recognised. Ensure that development proposals are sympathetic to these features through work with key stakeholders. |
| | Promoting regeneration at key regeneration areas including Morecambe town centre, Morecambe West End, Heysham Gateway, Luneside, Caton Road Gateway and White Lund Employment Area to encourage physical regeneration and promote economic growth in the district | Strategic Policies & Land Allocations DPD: Policies SP3, SP4, SG13, EC4, EC5, TC4, DOS1, DOS2, DOS3, DOS5, DOS6, SC1, T1, T2, T3 & T4. Development Management DPD: Policies DM1, DM2, DM14, DM16, DM22, DM23 & DM24. | Applications approved within the identified regeneration priority areas which provide economic benefit in terms of job creation, investment and bringing derelict land back into re-use to meet evidenced development needs. | Net increase in approvals for regeneration led proposals within identified regeneration priority areas. | Failure to deliver the target over three year intervals | Work with key stakeholders to understand obstacles to regeneration and address them in the most appropriate and effective manner. |
| | Supporting the delivery of housing that contributes to sustainable development and boosts opportunities for economic growth | Strategic Policies & Land Allocations DPD: Policies CC1 , SP6, SG1, SG7, SG9, SG11, H1, H2, H3, H4, H5, H6, DOS1, DOS2, DOS4, DOS5, DOS7 & SC1. Development Management DPD: Policies DM1, DM3, DM4, DM5, DM6, DM7, DM12, DM13, DM30a , Dm30b , DM30c & DM55. | <i>Reported under objective SO2</i> | <i>Reported under objective SO2</i> | <i>Reported under objective SO2</i> | <i>Reported under objective SO2</i> |
| | Securing a balanced portfolio of employment sites that ensures there is sufficient supply and range of locations available for job creation and economic growth | Strategic Policies & Land Allocations DPD: Policies SP4, SP5, SG1, SG9, SG12, SG13, EC1, EC2, EC3, EC4, DOS2, DOS7 & SC1. Development Management DPD: Policies DM14, DM15 & DM55 | <ul style="list-style-type: none"> Employment Site Surveys – Vacancy Rates (Employment Land Monitoring). Applications received for business related development on allocated employment sites (Employment Land Monitoring) | Net reduction in vacancy rates on identified employment sites. | Land remains vacant for over 3 years. | Continue to monitor the economic value of employment site in relation to occupation and vacancy levels. Where sites are not performing consideration would be given to alternative uses in accordance with national planning policy. |
| | Retaining a hierarchy of retail centres across the district that provide key services to local residents and provide good accessibility to the main centres of the district via a range of sustainable transport modes | Strategic Policies & Land Allocations DPD: Policies SP4, SP10, SG1, SG7, SG9, SG11, TC1, TC2, TC3, TC4, DOS6, T1, T2, T3 & T4. Development Management DPD: | <ul style="list-style-type: none"> Town Centre Health checks including Vacancy Rates Applications received for retail and main town centre uses within the defined centre (Retail Monitoring) Gross floorspace completed (A1, A2, B1a and D2 within identified town centres) within Lancaster, Morecambe and Carnforth town centre Pedestrian flows in the main retail centres Mix of uses (A1, A2, A3, A4, A5 and other) reported within the main retail centres | Net reduction in vacancy rates in Lancaster, Morecambe and Carnforth town centre. Net increase in pedestrian flows recorded in main retail centres. | Sites/buildings continue to remain vacant for over 3 years. Fall in pedestrian footfall reported over 3 year period. | Monitoring the health of defined centres within the hierarchy to ensure vitality and viability. Where there are challenges to this, consider where interventions are appropriate to boost vitality and viability. |

| Strategic Objective | Sub-objectives | Policies | Indicators | Targets | Trigger | Proposed action for target not being met |
|---|---|--|--|---|---|---|
| | | Policies DM16, DM17, DM18 & DM19. | | | | |
| | Addressing the clear imbalances in the district’s ageing population by encouraging growth in the district’s working age population through the promotion of economic growth and new housing and a cultural offer that is attractive to a wide range of age groups | Strategic Policies & Land Allocations DPD: Policies SP4, SP5, SP6, SP9, SG1, SG2, SG4, SG5, SG6, SG7, SG9, SG11, SG12, SG13, SG14, EC1, EC2, EC3, EC5, EC6, EC7, TC1, TC3, TC4, H1, H2, H3, H4, H5, H6, DOS1, DOS2, DOS4, DOS5, DOS7, SC1, SC2, SC3, SC4, SC5, T2 & T4. Development Management DPD: Policies DM1, DM2, DM8, DM12 & DM55 | <ul style="list-style-type: none"> Levels of employment for the over 64 age bracket. Levels of housing approved for the over 55 age bracket. | <p>Reduction in unemployment levels within the district</p> <p>Positive assessment within the districts housing needs survey for over 55 age group.</p> | <p>Increase in unemployment levels over a 3 year period.</p> <p>Negative assessment for over 55 age group within local housing needs assessment.</p> | <p>Seek to work with stakeholders to ensure that opportunities are available for older people to seek employment where they choose to.</p> <p>Potential review of housing policies in relation to older person housing delivery.</p> |
| | Maximising the retention of graduates from the district’s Higher Education establishments and boosting the levels of skilled workers in the district to promote economic growth | Strategic Policies & Land Allocations DPD: Policies SP4, SP5, SG2, SG9, SG12, SG14, EC1, EC2, EC3, H1, H2, H3, H4, H5, H6, DOS1, DOS2, DOS4, DOS5 & SC1. Development Management DPD: Policies DM1, DM2, DM3, DM4, DM6, DM12, DM13, DM14, DM15 & DM55. | Growth in resident population between 24 – 30 – ONS | Increased retention of graduates | Reported decline in 24-30 age group | Consider how the impact of new housing, employment, cultural and leisure facilities has effected the retention of graduates and whether further promotion and creation of facilities can be achieved through liaison with key stakeholders. |
| | Making the most of the district’s geographical position on Morecambe Bay, the location of two Areas of Outstanding Natural Beauty, the Yorkshire Dales National Park, which is partly within the district and the nearby Lake District National Park | Strategic Policies & Land Allocations DPD: Policies SP8, EN2, EN3, EN4, EN5, EN7, SC2, SC3, SC4, T2 & T3. Development Management DPD: Policies DM16, DM17, DM18 & DM46. | <ul style="list-style-type: none"> Employee Jobs by Industry – I: Accommodation and Food Service Activities – NOMIS Levels of Visitor Numbers attracted to the District. | The current level of employment in this sector is 5,000 jobs, seek growth in this sector of 500 through the course of the entire plan period. | Fall in employment within this sector over a three year interval | Ensure an appropriate balance between delivering economic benefits and protection of the environment. In the event that visitor numbers to the area are not boosted then consider (via liaison with stakeholders) how better promotion of the area can be achieved. |
| | Supporting rural diversification, rural job creation and rural economic growth through encouraging and securing appropriate growth of existing and new rural businesses | Strategic Policies & Land Allocations DPD: Policies SP4, SP5, EC1, EC2 & EC3. Development Management DPD: Policies DM14, DM15, DM47, DM48 & DM49. | Rural employment premises delivered. | Increased delivery of rural employment premises | Failure to deliver employment premises over three year intervals. | Where opportunities for growth in the rural economy are being obstructed. Consider these barriers and consider whether a more flexible approach is required toward rural economic growth in the context of local and national planning policy. |
| SO2: Provision of a sufficient supply, quality and mix of housing to meet the changing needs of the population and support growth and investment. | Delivering housing in the district to support economic growth and meet housing needs in the most sustainable locations including Lancaster, Morecambe, Heysham, Carnforth and other identified Sustainable Settlements; | Strategic Policies & Land Allocations DPD: SP2, SP3, SP6, SG1, SG5, SG7, SG9 & SG11. Development Management DPD: DM1, DM2, DM3, DM4, DM5, DM6, DM7, DM8, DM9, DM10, DM11, DM12 and DM13 | <p>Net additional dwellings completed for the reported financial year reporting:</p> <ul style="list-style-type: none"> Completions on allocated sites Completions on unallocated (windfall) sites, split by PDL and greenfield <p>Net additional dwellings completed since the plan was adopted.</p> <p>5 year housing land supply position</p> | <p>Provision of 10,440 dwellings over the plan period.</p> <p>5 years of deliverable housing land at all times</p> | <p>Shortfall in 5 year supply of greater than 1 year</p> <p>Align to proposed housing delivery test: 95% below annual requirement, 25% below annual requirement from November 2018, 45% below annual requirement from November 2019, 65% below annual requirement from November 2020.</p> | <p>Identify problems and potential causes of variants and identify measures to address them.</p> <p>Work with key providers, developers and landowners to better manage the delivery of development (this could involve reviewing S106 agreements and other contributions)</p> <p>Identify potential funding opportunities to help bring sites forward</p> <p>Work with HCA to bring forward sites</p> <p>Implementation of measures identified by the proposed Housing Delivery Test</p> |

| Strategic Objective | Sub-objectives | Policies | Indicators | Targets | Trigger | Proposed action for target not being met |
|---------------------|---|--|---|---|--|--|
| | | | | | | Implement a call for sites and potential review of capacity via the SHELAA Consider a review Local Plan |
| | Building a range of housing types, sizes and tenures to meet the needs of all members of the community; | Strategic Policies & Land Allocations DPD: SG1, SG7, SG9, SG11, H1, H3, H4, H5, H6 Development Management DPD: DM1, DM2, DM3, DM7, DM8, DM10, DM11, DM12, DM13 | <ul style="list-style-type: none"> Split between housing types across development sites: Semi/detached/terraced/flat/bungalow/other Split by number of bedrooms Residential developments with new dwellings meeting the Nationally Described Space Standard Number of affordable completions as a percentage of overall housing delivery | To be determined by emerging Housing Strategy – general housing completions to match type and size required as determined by most up to date Strategic Housing Market Assessment All new dwelling completions to meet the Nationally Described Space Standards Affordable housing completions matching policy requirements on all new residential development | 25% of new housing completions not meeting Nationally Described Space Standards 25% of new housing completions not meeting adopted policy on affordable housing | Identify problems and potential causes of variants and identify measures to address them Consider update of Local Plan Viability Assessment in order to identify whether position has changed on viability Liaise with developers to understand why targets are not being met to identify barriers and understand potential ways of addressing situation. Review Local Plan |
| | Ensuring that new development is well designed, sustainable and meets the required energy efficient and water efficiency standards | Strategic Policies & Land Allocations DPD: CC1 SP3, SG1, SG2, SG5, SG7, SG9, SG11, SG13, EC2, EC3, EC5, EC6 & TC3. Development Management DPD: DM2, DM29, DM30a,DM30b, DM30c, DM31, DM32, DM33, DM34, DM35 & DM36 | Number of new homes built each year above required building standards. Number of new homes granted planning permission each year which fail to deliver the required carbon emissions standards identified in Policy DM30a Number of new homes granted planning permission each year which fail to deliver the required water efficiency standards identified in Policy DM30b Number of zero carbon developments completed in the District Development receiving design awards (Lancaster District design awards, civic trust awards, BURA awards, RTPI awards or CABA awards) Number of appeal decisions won on design grounds Proportion of new dwellings subject to planning permissions granted each year requiring electric car recharging points. Number of new developments granted planning permission each year which fail to deliver required electric vehicle charging point provision | Approval of 2 exemplar energy schemes per annum within the district All new developments meet the required carbon emission standards at the point of construction All new developments meet the required water efficiency standards at the point of construction Stepped increase in zero carbon developments over the lifetime of the Plan 2 or more design awards or referrals achieved per annum. 100% of appeal decisions won on design grounds 75% of new dwellings granted approval by 2031 to be fitted with electric car recharging points All new developments meet required electric vehicle charging point provision at the point of construction | Failure to deliver the target over two year intervals Failure to deliver the target over two year intervals 25% of appeals lost on design grounds. No zero carbon developments completed within a three year period. Authority monitoring reveals failure to condition 75% of new dwelling permissions within reported year. Failure to deliver targets for the provision of electric vehicle charging points over two year intervals. | Identify problems and potential causes of variants and identify measures to address them. Investigate the opportunity to prepare additional guidance in relation to energy and water efficiency. Consider update of Local Plan Viability Assessment in order to identify whether position has changed on viability. Liaise with developers to understand why targets are not being met to identify barriers and understand potential ways of addressing situation In relation to electric charging points work with the Council's air quality officer to identify potential barriers. Possible review of supplementary planning guidance on this issue. Where appeals are being lost on design investigate the need for additional design guidance and training for officers. Consider a review of the Local Plan. |
| | Developing high quality housing that is appropriate and affordable for current and future residents particularly within rural areas of the district, contributing to the creation of a balanced housing market; | Strategic Policies & Land Allocations DPD: SP2, SP6, SG1, SG7, SG9, SG11, H1, H2, H4, H5, H6 Development Management DPD: DM1, DM2, DM3, DM4, DM5, DM6, DM12 | Housing completions in the rural areas in comparison to suggested housing mix in Strategic Housing Market Assessment for rural sub areas Number of affordable completions in rural areas Percentage of rural affordable housing completions as a percentage of overall housing delivery in the rural area | 80% of new housing developments to broadly accord with Strategic Housing Market Assessment suggested mix for housing Increase number of affordable completions within rural areas of the district All new residential developments in rural areas to meet affordable housing policy requirements | Less than 50% of new housing completions in rural areas not meeting suggested housing mix in Strategic Housing Market Assessment Number of affordable housing completions in rural areas drops for third consecutive year Less than 25% of new housing completions over a two year | Identify problems and potential causes of variants and identify measures to address them Consider update of Local Plan Viability Assessment in order to identify whether position has changed on viability Liaise with developers to understand why targets are not being met to identify barriers and understand potential ways of addressing situation. Review Local Plan |

| Strategic Objective | Sub-objectives | Policies | Indicators | Targets | Trigger | Proposed action for target not being met |
|---------------------------------------|--|--|--|---|--|--|
| | | | | | period meeting adopted policy on affordable housing in rural sub areas | |
| | Securing the long-term sustainability of rural communities by supporting well designed and located rural housing of appropriate tenure to meet local needs | Strategic Policies & Land Allocations DPD: CC1, SP2, SP6, H2 Development Management DPD: DM1, DM2, DM3, DM4, DM5, DM6, DM30a, DM30b and DM30c | Number/percentage of new dwellings granted planning permission in rural areas meeting Nationally Described Space Standards Number percentage new dwellings in rural areas meeting M4(2) Building Regulations Number of homes granted planning permission each year in rural areas which fail to deliver the required carbon emissions standards identified in Policy DM30a Number of homes granted planning permission each year in rural areas which fail to deliver the required water efficiency standards identified in Policy DM30c Number of affordable completions in rural areas | All new dwellings in rural areas meeting Nationally Described Space Standards 20% of all new dwellings in rural areas meeting M4(2) Building Regulations All new developments in rural areas meet the required carbon emission standards at the point of construction All new developments in rural areas meet the required water efficiency standards at the point of construction 40% (50% in AONB) of all new homes in rural areas being affordable | Under 75% of new homes over a two year period not meeting Nationally Described Space Standards Under 10% of new dwellings over a two year period meeting Nationally Described Space Standards Failure to deliver the target over two year intervals Failure to deliver the target over two year intervals Less than 25% of new housing completions over a two year period meeting adopted policy on affordable housing in rural sub areas | Identify problems and potential causes of variants and identify measures to address them. Consider update of Local Plan Viability Assessment in order to identify whether position has changed on viability. Liaise with developers to understand why targets are not being met to identify barriers and understand potential ways of addressing situation. Review Local Plan |
| | Seeking to bring back into use residential properties which have suffered from long-term vacancy in order to make a contribution towards meeting housing needs | Strategic Policies & Land Allocations DPD SP3 & SP6 Development Management DPD: DM1, DM2, DM3 & DM13. | Percentage of empty homes in the district | Reduce the number of homes that have been empty for more than 2 years by 10% | Failure to deliver the target over two year intervals | Identify problems and causes of vacancy Work with key partners to assist in bringing dwellings back into use targeting persistent long-term vacancies. Assess the need for additional resources within the City Council to address this issue. |
| | The preparation, implementation and on-going maintenance of a Brownfield Register to ensure that there is a full understanding of available brownfield land and that where appropriate to do so development proposals for such sites can come forward in a positive and proactive manner | Strategic Policies & Land Allocations DPD SP3 | New and converted dwellings completed on pdl Total amount of floorspace completed on pdl | 70% of sites on the brownfield register brought back into use. | If target is not achieved by 2024 | Identify problems and potential causes of variants and identify measures to address them Work with key providers, developers and landowners to better manage the delivery of development (this could involve reviewing S106 agreements and other contributions) Work with HCA to bring forward sites Progress to stage 2 of the Local Brownfield Register; Assess the need for additional resources within the City Council to address this issue. |
| | To address Addressing the specific needs of the Gypsy, Traveller and Travelling Show people communities to ensure their needs can be met through the course of the plan period | Strategic Policies & Land Allocations DPD: SP6 Development Management DPD: DM9 | Number of new permanent pitches available in the district Number of unauthorised and illegal encampments or developments, and enforcement actions carried out within the district per annum. The level of need for pitches identified within the latest Gypsy and Traveller Accommodation Assessment or Housing Need Study. Number of planning applications submitted for new sites or extensions and/or alterations to existing sites and their outcome. | To meet the level of identified need To aim to meet the unmet cultural need for Gypsy and Traveller sites To minimise the number of illegal encampments and the need for enforcement action carried out | A reduction in available supply of pitches below 50% of need Significant increase in illegal encampments or need for enforcement action | Bring forward Gypsy and Traveller Site Allocations in line with dates in Local Development Scheme Continue to work with gypsy and traveller community to ensure needs are being met wherever possible Keep evidence base on gypsy and traveller needs up to date |
| SO3: Protect and enhance the natural, | Respecting, conserving and enhancing the character, setting and local distinctiveness of places, buildings and landscapes | Strategic Policies & Land Allocations DPD CC1, | % of conservation areas with appraisal | 17 of 36 Conservation Areas to have an appraisal by Feb 2020 (47%) | No progress made in producing conservation area | In relation to the first three indicators assess conservation |

| Strategic Objective | Sub-objectives | Policies | Indicators | Targets | Trigger | Proposed action for target not being met |
|---|---|--|---|--|---|---|
| historic and built environment of the district. | though careful design and siting of development, and encouraging new development to make a positive contribution, in order to retain the district's unique character and identity. | SP7, SP8, SP9, SG1, SG2, SG5, SG6, SG7, SG9, SG11, SG12, SG13, EC3, EC5, EC6, H3, H4, H6, DOS4, DOS5, EN1, EN2, EN3, EN4, EN5, EN6, EN7, EN8, SC1 & TC3. Development Management DPD: DM2, DM3, DM4, DM21, DM29, DM37, DM38, DM39, DM40, DM41, DMCC1, DMCC2, DM42, DM30a, DM30b, DM30c,, DM45, DM46, DM53, DM55, DM65 & DM66. | % of conservation areas with management plans/design guides Up-to-date district wide Heritage Strategy Number of conservation-related pre-application advice received (DM or specialist heritage advice). Number of applications approved for the sensitive retrofitting of energy efficiency measures and/or micro-renewable energy schemes on historic buildings (listed buildings, buildings located in Conservation Areas and NDHAs) Number of applications approved for sensitive micro-renewable schemes approved in the setting of heritage assets | 4 of 36 of the Conservation Areas to have a management plan or design guide by Feb 2020 (14%) Adopt by April 2020 then keep up to date (review at least every 4 years) Annual increase from April 2018 baseline to April 2020 No increase in heritage at risk following in the installation of measures No increase in heritage at risk following the installation of measures | appraisals or Management Plans/Design Guides by February 2019 No progress made in producing conservation area appraisals or management plans / design guides by August 2019 Check progress and ensure on track by December 2019 No increase or drop in the number of heritage related pre-application advice applications received per annum Any increase in buildings at risk as a result of this policy Any increase in buildings at risk as a result of this policy | team workload and re-assess priorities if necessary. Engage with local agents and architects to promote pre-application advice service. Engage with local agents and architects to understand why an impact has occurred. Investigate a review of the policy. |
| | Maintaining and enhancing the character and heritage of the district's settlements | Strategic Policies & Land Allocations DPD: SP7, SG4, SG5, SG6, EC5, H3, DOS6, EN1, EN2, EN8 & SC1 Development Management DPD: DM2, DM3, DM4, DM21, DM29, DM37, DM38, DM39, DM40, DM41, DM30, DM44, DM45, DM52, DM54, DM64 & DM65. | All of the above indicators, and; Condition of Article 4 Direction Areas stable or improving Number of heritage-led regeneration and restoration projects managed by the Council (operating or applied for) or being a stakeholder in. | Bi-annual condition survey of Article 4 Direction Areas shows the trend as stable or improving. Increase in Council involvement in Regeneration Priority Areas (Policy EC5) | Increase in the number of enforcement cases annually relating to Article 4 Directions on an annual basis. Condition of Regeneration Priority Areas declines or becomes 'at risk'. | Further engagement with Enforcement Team to consider proactive enforcement tools available (i.e. S215 Notices, Enforcement Notices); Review the effectiveness of access to information on the requirements for planning permission on the Council's webpage. Further engagement with building owners;; Engage with Enforcement Team to consider use of proactive enforcement powers available (i.e. S215, Urgent Works and Repairs Notices); Further engagement Regeneration Team, as well as funding bodies, e.g. HLF, AHF. |
| | Conserving and enhancing the district's heritage assets and their settings in a manner appropriate to their significance, so that they can continue to be enjoyed by this and future generations. | Strategic Policies & Land Allocations DPD: SP7, SG5, SG6, SG7, SG9, EC5, H3, H4, H6, DOS1, DOS4, DOS5, EN1, EN5, EN7, EN8, SC1 & T3. Development Management DPD: DM2, DM3, DM4, DM21, DM26, DM37, DM38, DM39, DM40, DM41, DM42, DM45, DM46, DM47, DM53, DM65 & DM66. | All of the above indicators and Number of listed buildings on the national 'Heritage at Risk' Register produced by Historic England Number of buildings on the List of Local Heritage Assets Number of buildings on the List of Local Heritage Assets | Removal of assets from HAR Register, or progress made in addressing issues with them Removal of listed buildings from Register (from July 2019 baseline) Increase in number of local heritage assets expected annually as work on the list progresses | No change or increase in numbers of heritage assets on the HAR Register or local BAR Register No increase in numbers on List of Local Heritage Assets. | Further engagement with building owners; further engagement with Historic England regarding buildings on HAR; Engage with Enforcement Team to consider use of proactive enforcement powers available (i.e. S215, Urgent Works and Repairs Notices). Engage with local neighbourhood plan groups, parish councils and AONB officers on help with the |

| Strategic Objective | Sub-objectives | Policies | Indicators | Targets | Trigger | Proposed action for target not being met |
|---------------------|--|---|---|--|--|--|
| | | | | | | identification of local heritage assets within their local area. |
| | Recognising the historic environment’s potential for investment and ensuring that it informs regeneration projects in order to secure better outcomes for sustainable growth | Strategic Policies & Land Allocations DPD: SG5, SG6, EC5, TC4, H3, H6, DOS4, DOS5, DOS7, EN1 & SC1 Development Management DPD: DM37, DM38, DM39, DM40, DM41, DM42 & DM55 | Number of heritage assets on the national ‘Heritage at Risk’ Register produced by Historic England Number of listed buildings on the local Buildings at Risk Register Number of vacant Primary Retail Frontages Number of heritage-led regeneration projects managed by the Council (operating or applied for). | Removal of assets from HAR Register, or progress made in addressing issues with them Removal of listed buildings from local Buildings at Risk Register (from July 2019 baseline) Reduction in no. of vacant Primary Retail Frontages. Increase in Council involvement in Regeneration Priority Areas (Policy EC5) | No change in numbers of heritage assets on the HAR Register or local BAR Register Change or increase in no. of vacant Primary Retail Frontages. Condition of Regeneration Priority Areas declines or becomes ‘at risk’. | Further engagement with BAR/HAR building owners; further engagement with Historic England regarding buildings on HAR; Engage with Enforcement Team to consider use of proactive enforcement powers available (i.e. S215, Urgent Works and Repairs Notices). Further engagement Regeneration Team, as well as funding bodies, e.g. HLF, AHF. Further engagement Regeneration Team, as well as funding bodies, e.g. HLF, AHF, HAZ |
| | Realising the tourism and visitor potential and economic benefits of the district’s historic environment, and ensuring that engagement with and access to it are increased | Strategic Policies & Land Allocations DPD: SG5, SG6, EC5, TC4, SC1 & T3 Development Management DPD: DM16, SM17, DM18, DM37, DM38, DM39, DM40, DM41 & DM42 | Visitor Numbers to tourist sites Number of operating county museums An up to date Cultural Heritage Strategy | Maintain and increase visitor numbers at key tourist sites Maintain number of operating county museums Up to date Cultural Heritage Strategy | Reduction in visitor numbers over two year intervals. Closure of county museums Check status and where over 5 years old consider review | Work with key partners to identify problems and causes of variants and identify measures to address them. Identify measures to better promote resources. Identify where additional resources might be required should Cultural Heritage Strategy require review. |
| | Recognising and respecting the international importance of Morecambe Bay and Duddon Estuary, Morecambe Bay Pavements, Bowland fells, Leighton Moss and Calf Hill/Crag Wood, where possible securing opportunities for habitat restoration and enhancement within them and protecting them from inappropriate development and increased recreational pressure | Strategic Policies & Land Allocations SP3, SP7, SP8, SG1, SG7, SG9, SG11, SG12, SG13, SG14 & EN7. Development Management DPD: DM29 | Creation of areas designated for their intrinsic environmental value including sites of international, national, regional or local significance. Loss of areas designated for their intrinsic environmental value including sites of international, national, regional or local significance. | No net loss Net gains in biodiversity | Any loss of land of biodiversity importance. | Identify the problems and causes of variants and identify measures to address them Look to provide additional guidance to support relevant policies Activate compensation, enforcement or mitigation measures Review Local Plan |
| | Conserving and enhancing the natural beauty and special qualities of the district’s two Areas of Outstanding Natural Beauty (AONB), securing appropriate opportunities for sustainable growth linked to the natural environment and landscape capacity | Strategic Policies & Land Allocations: SP3, SP8 Development Management DPD: DM4, DM29, DM30 | Area of land protected from development for their intrinsic landscape character or visual amenity value. Loss of areas designated for their intrinsic landscape character or visual amenity value. Number of dwellings built within AONB areas Employment developments created or lost within AONB areas | No net loss of landscape character or visual amenity Development levels close (+/- 20%) to expected rates. No net loss of employment opportunities | Any loss of landscape character or visual amenity Unexpected development rates Any net loss of employment opportunities | Identify the problems and causes of variants and identify measures to address them Look to provide additional guidance to support relevant policies |
| | Protecting, enhancing and extending the connectivity of our green and blue spaces, corridors and chains that make up the wider green and blue infrastructure network, harnessing the multifunctional value and benefits such spaces can provide in adapting and mitigating to the impacts of climate change & providing new and maintaining existing ecological corridors, preventing habitat fragmentation and allowing species adaptation and migration and protecting natural features which provide local distinctiveness including mature trees and ancient woodland, hedgerows and ponds | Strategic Policies & Land Allocations CC1, SP3, SP8, SG1, SG7, SG9, SG11, DOS3, DOS8, EN5 & EN7 Development Management DPD: DM29, DM43, DM44, DM45 & DM55 | Location and extent of existing ecological corridors/networks within the District Number of new developments that create new and/or enhance connections within the GBI network New areas of ecological corridors created to extend and enhance the existing network as part of new development proposals Number of development proposals which result in the loss (and extent/% of loss) of areas recognised as being part of the ecological corridors/networks and natural features which provide local distinctiveness Percentage of the district designated as GBI Percentage area of new developments that provide multifunctional GBI | No net loss or fragmentation of existing ecological corridors/networks or natural features which provide local distinctiveness Net gains in habitat creation as a result of new development. No reduction in the percentage of the district designated as GBI | Year on year reduction in condition and extent of ecological corridors/networks within the district. Year on year reduction in mature trees, ancient woodland, hedgerows and ponds Any loss of land of biodiversity importance. Year on year reduction in GBI | Identify the problems and causes of variants and identify measures to address them Look to provide additional guidance to support relevant policies Work with Natural England and other partners to address problems. Work with developers to seek opportunities where ecological corridors/networks could be extended |

[illegible]

| Strategic Objective | Sub-objectives | Policies | Indicators | Targets | Trigger | Proposed action for target not being met |
|---|---|--|---|---|---|---|
| | | | <p>Air Quality levels</p> <p>Land identified as contaminated</p> <p>Complaints regarding noise, smells and fumes</p> | <p>Increase in remediation of contaminated land</p> <p>Reduction in complaints regarding noise, smells and fumes</p> | <p>Year on year increase in air quality levels (Incidences where thresholds for air quality are exceeded in recorded measurements - a) within air quality management plan are and b) low level ozone) Increase (or no net decrease) in contaminated land</p> <p>Increase in complaints regarding noise, smells and fumes</p> | <p>Work with developers to seek opportunities to improve quality of design in relation to waste and energy efficiency Activate compensation, enforcement or mitigation measures Where necessary review Local Plan</p> |
| | Minimising and reducing the risk of flooding to people and property | Strategic Policies & Land Allocations DPD: SP3, SP8, SG1, SG2 Development Management DPD: DM33, DM34 | <p>Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds</p> <p>Number of properties completed since the CELPR was adopted which have been flooded</p> <p>Number of Sustainable Drainage Systems provided.</p> <p>Number of major applications which include above ground multi-functional SuDs schemes</p> <p>Number of complaints made regarding SuDs and reported instances of failures</p> <p>Number of schemes which meet the run-off rates in Policy DM34</p> | <p>Decrease proportion of applications granted on areas of higher flood risk compared with Zone 1.</p> <p>No reported flooding in completed properties</p> <p>All major schemes to include above ground multi-functional SuDs</p> <p>No reported complaints or failures</p> <p>No schemes that reduce run-off rates</p> | <p>Reduction in SuDS provision</p> <p>Monitoring of any future flooding events and impacts of new development</p> <p>2 or more major schemes approved each year which fail to provide above ground multi-functional SuDs</p> <p>Increase in complaints and failures reported year on year</p> <p>Failure to deliver the target</p> | <p>Work with partners to manage flood risk including Environment Agency, Lead Local Flood Authority (Lancashire County Council), United Utilities and non-statutory organisations Maintain up to date evidence base including Strategic Flood Risk Assessment</p> |
| | Establishing clearly defined Green Belt boundaries, which will be robust and endure for the long-term. | Strategic Policies & Land Allocations DPD: Policies SP3, SP7, SP8, SG9, & EN4. Development Management DPD: Policy DM50. | <p>Applications received which are located on the edge of the North Lancashire Green Belt.</p> <p>Applications which are approved contrary to Green Belt status.</p> | <p>No applications granted permission which are contrary to national and local policy in relation to the Green Belt</p> | <p>1 or more applications granted contrary to national and local policy in relation to the Green Belt.</p> | <p>Where there is continued erosion of the Green Belt, consider the need for a further review of the Green Belt. Review Local Plan to identify additional opportunities to meet district needs.</p> |
| SO4: The provision of necessary infrastructure required to support both new and existing development and the creation of sustainable communities. | Working with infrastructure providers to ensure that the infrastructure required to support the community is provided in the right place and at the right time | Strategic Policies & Land Allocations DPD: Policies SP3, SP9, SG3, SG8, SG10, H1, H2, H2, H3, H4, H5, H6, DOS1, DOS2, DOS4, DOS5, DOS6, DOS7 & SC1. Development Management DPD: Policies DM24, DM55, DM57, DM58, DM59, DM60, DM61, DM62, DM63 & DM64. | The implementation of necessary infrastructure as identified in the Infrastructure Delivery Schedule. | Delivery of infrastructure as described in the Infrastructure Delivery Plan. | Year on year failure to meet timescales identified within the Infrastructure Delivery Plan. | Continue to liaise with infrastructure providers to ensure that provision is made, where this cannot be achieved consider how barriers can be removed. Where they cannot be addressed and it has significant implications on the plan, there may be a requirement to review the content of the plan (particularly where the infrastructure would be strategic in nature). |
| | The investigation, delivery and implementation of a infrastructure charging system which ensures that development contributes to the needs of the community and the delivery of sustainable development | Strategic Policies & Land Allocations DPD: Policies SP9, SG3, SG8, SG10 & SC1. Development Management DPD: Policy DM58. | The preparation of an appropriate charging schedule. | Charging schedule in place by the end of 2020. | Failure to meet target | The failure to deliver an infrastructure charging system may have implications on delivering necessary and important infrastructure which may restrict the ability to deliver sustainable development in accordance with the adopted Development Strategy. Should this occur then consideration will be needed |

| Strategic Objective | Sub-objectives | Policies | Indicators | Targets | Trigger | Proposed action for target not being met |
|---------------------|--|--|---|---|---|--|
| | | | | | | on whether the Development Strategy requires review. |
| | Protecting and enhancing existing social and community infrastructure including education, health, cultural and leisure facilities. Improving and promoting community health and wellbeing across the social gradient in line with an understanding of predicted future needs and current gaps in provision | Strategic Policies & Land Allocations DPD: Policies SP3, SP9, SG3, SG8, SG10, H1, H2, H3, H4, H5, H6, DOS1, DOS3, DOS4, DOS5, DOS6, DOS7 & SC1. Development Management DPD: Policies DM20, DM55, DM56, DM57, DM58, DM59 & DM64. | Reported loss of community facilities | No loss in community facilities | Year on year reduction in reported community facilities. | Should community facilities, which are demonstrably special to the communities they service, be lost consideration should be given as to whether further protection is necessary in the Local Plan process. |
| | Protecting and enhancing existing natural infrastructure which forms part of the District's green and blue infrastructure network , including the identification and protection of functionally linked land, managing associated land use practices and potential recreational disturbance and ensuring the continued protection of protected species and their associated habitats | Strategic Policies & Land Allocations DPD: CC1 , SP3, SP7, SP9, SG1, SG3, SG7, SG8, SG9, SG10 & SG11. Development Management DPD: DM29, DM43, DM44, DM45, DM46 | <p>No of SSSIs within or partly within the District</p> <p>No of units that comprise SSSIs within or partly within the District</p> <p>% of SSSIs units assessed as being in favourable or unfavourable condition</p> <p>New greenspace habitats created as part of new development proposals-</p> <p>Number of schemes which secure new habitat creation</p> <p>New schemes which have demonstrated biodiversity net gain</p> <p>Greenspace habitats lost as a result of new development-Area of GBI network lost to new development (including habitats)</p> <p>Creation of areas designated for their intrinsic environmental value including sites of international, national, regional or local significance.</p> <p>Loss of areas designated for their intrinsic environmental value including sites of international, national, regional or local significance.</p> <p>% change in tree canopy across the district.</p> <p>Recorded enhancement of green and blue infrastructure across the district (based on 6 key themes)</p> | <p>Maintain number of SSSIs within the district</p> <p>Improve % of SSSIs recorded as being in favourable condition.</p> <p>Net gains in habitat creation as a result of new development.</p> <p>Net gains in biodiversity</p> <p>No net loss</p> <p>Maintain tree canopy</p> <p>Increase in reported enhancement schemes</p> | <p>Year on year reduction in the condition and number of SSSIs within the district.</p> <p>Year on year reduction in greenspaces</p> <p>Any loss of land of biodiversity importance.</p> <p>Two consecutive year reduction in tree canopy coverage</p> <p>Two consecutive years with no enhancement schemes reported</p> | <p>Identify the problems and causes of variants and identify measures to address them</p> <p>Look to provide additional guidance to support relevant policies</p> <p>Work with Natural England and other partners to address problems.</p> <p>Activate compensation, enforcement or mitigation measures</p> <p>Where necessary review Local Plan</p> |
| | Ensuring that people have access to services in a location and delivered by a means that is convenient and ensuring that development provides the opportunity for healthier lifestyles through the provision of high quality green infrastructure, recreation, leisure and sports facilities | Strategic Policies & Land Allocations DPD: CC1 , SP3, SP9, SG1, SG3, SG7, SG8, SG9, SG10, SG11, SC1, SC2, SC3, SC4, & SC5. Development Management DPD: DM16, DM17, DM18, DM19, DM20, DM22, DM27, DM55, DM60, DM61, DM62, DM63 & DM64 | <p>Number of new homes built each year within the settlements identified as Sustainable Settlements (identified in policy SP2)</p> <p>Number of new homes built each year within the Rural Villages</p> <p>Provision of new open space, recreation, leisure and sports facilities</p> <p>Loss of open space, recreation, leisure and sports facilities.</p> <p>Number of enhancement schemes secured for existing designated areas of open space through new development proposals</p> | <p>Outside of the three main areas, housing development growth is to be focussed within the settlements identified as Sustainable Settlements</p> <p>Increase in provision of open space, recreation, leisure and sports facilities where a deficit or need has been identified</p> <p>No loss of existing 'key' and 'other' services within settlements</p> <p>Increase in provision of 'key' and 'other' services where there is an identified need</p> <p>Increase in enhancement schemes secured where onsite provision is not possible</p> | <p>Where in the reported monitoring year housing completions outside of identified settlements exceeds 10%</p> <p>Year on year reduction in open space, recreation, leisure and sports facilities</p> <p>Loss of 'key' services, and 'other' services within rural settlements</p> <p>Failure to secure enhancement</p> | <p>Identify the problems and causes of variants and identify measures to address them</p> <p>Look to provide additional guidance to support relevant policies</p> <p>Work with Lancashire County Council and other partners to address problems.</p> <p>Work with developers to seek opportunities to improve quality of green infrastructure</p> <p>Where necessary review Local Plan</p> |

| Strategic Objective | Sub-objectives | Policies | Indicators | Targets | Trigger | Proposed action for target not being met |
|--|--|---|--|--|---|--|
| | | | % increase in access to green and blue infrastructure across the most deprived wards in the District Number of green and blue infrastructure enhancement schemes secured through new development | Increase access to green and blue infrastructure in the most deprived wards of the district. Improvements in the quality of green and blue infrastructure across the district. | Year on year worsening of green and blue infrastructure in the most deprived wards of the district Year on year reduction in the overall quality of green and blue infrastructure across the district | |
| | Seeking opportunities to reduce the opportunity for crime and anti-social behaviour | Strategic Policies & Land Allocations DPD: SP3, SP9, SG3, SG8 & SG10 Development Management DPD: DM3, DM29 & DM30 | Recorded crime rate (BCS compactor) per 1,000 of the population | Reduction in crime rate from reported baseline position of 1 st April 2017 | Failure to deliver the target over two year intervals | Identify the problems and causes of variants and identify measures to address them Work with key partners to identify potential solutions Consider preparation of additional guidance to reduce crime through design |
| | Working to reduce levels of air pollution within the district, particularly in the designated Air Quality Management Areas (AQMA's) of Lancaster City Centre, Carnforth Town Centre and Galgate and other major transport corridors within the district. | Strategic Policies and Land Allocations: SP1-SP10, SG1-SG14 EC1-EC7, TC1-TC4, H1 – H6, DOS1-DOS8, EN2, EN5, EN7, EN9, T4 Development Management Policies DPD: DM1, DM2, DM29, DM30, DM31 | Air Quality levels | Reduction in air quality levels Removal of Air Quality Management Areas (AQMA’s) | Year on year increase in air quality levels (Incidences where thresholds for air quality are exceeded in recorded measurements - a) within air quality management plan are and b) low level ozone) | Identify the problems and causes of variants and identify measures to address them Look to provide additional guidance to support relevant policies Where necessary review Local Plan |
| SOS: Delivery of a safe and sustainable transport network that improves both connection within and out of the district, reducing the need to travel and encouraging more sustainable forms of transport. | Concentrating development to sustainable locations that are accessible by a variety of modes of transport, particularly public transport, walking and cycling | Strategic Policies & Land Allocations DPD: CC1, SP2, SP3, SP6, SP10,SG4, SG7, SG8,SG9, SG10, SG11, EC2, T1, T2, T3, T4 Development Management DPD: DM57, DM58, DM60, DM61 & DM63 | % of adults walking at least once a week (continuous for 10 mins or more) % of adults cycling at least once a week Train station passenger numbers (Lancaster, Carnforth, Morecambe,) Bus passenger numbers reported in the district | Increase in % of adults walking Increase in % of adults cycling Increase in number of passengers as a proportion of the total population. Increase in number of bus passengers as proportion of total population. | Failure to increase use of sustainable transport | Identify where lack of infrastructure or lack of service provision occurs. Target infrastructure delivery in critical areas. Promote and publicise opportunities to utilise sustainable transport (Travel Plans etc.) |
| | Encourage behavioural change to a switch to active travel modes to reduce greenhouse gas emissions, by reducing the dominance of car use and prioritising cycling and walking | Strategic Policies & Land Allocations DPD: CC1, SP2, SP3, SP6, SP10,SG4, SG7, SG8,SG9, SG10, SG11, EC2, T1, T2, T3, T4 Development Management DPD: DM29, DM57, DM58, DM60, DM61 & DM63 | % of adults walking at least once a week (continuous for 10 mins or more) % of adults cycling at least once a week Train station passenger numbers (Lancaster, Carnforth, Morecambe,) Bus passenger numbers reported in the district Length of new cycle way created in the district Number of cycle parking spaces provided in completed in developments of 10 dwellings or above and 1,000 sq metres of non-residential development Number of car free developments approved in the district | Increase in % of adults walking Increase in % of adults cycling Increase in number of passengers as a proportion of the total population. Increase in number of bus passengers as proportion of total population. Increase in cycle network over a 5 year period No loss of cycle lane provision New cycle parking spaces match required standards Approval of 3 car free developments by 2025/26 | Failure to increase use of sustainable transport Failure to increase cycle network Consecutive loss of cycle network over a two year period Failure to deliver required cycle parking spaces No car free developments completed over a five year period | Identify the problems and causes of variants and identify measures to address them. Work with key partners to identify potential solutions. Consider preparation of additional guidance to ensure increased provision. |
| | Improving transport connectivity around Morecambe Bay through improvement to rail services at Morecambe and Carnforth and improvements to cycling and pedestrian routes | Strategic Policies & Land Allocations DPD: | % of adults walking at least once a week (continuous for 10 mins or more) % of adults cycling at least once a week | See targets set out in Lancashire Cycling and Walking Strategy | Failure to increase use of sustainable transport | Identify where lack of infrastructure or lack of service provision occurs. |

| Strategic Objective | Sub-objectives | Policies | Indicators | Targets | Trigger | Proposed action for target not being met |
|---------------------|---|---|---|--|--|---|
| | | CC1, SP2, SP3, SP6, SP10, SG11, DOS6 EC2, T2, T4 Development Management DPD: DM57, DM58, DM60, DM61 & DM63 | Train station passenger numbers (Carnforth, Morecambe, Silverdale, Bare) Implementation of sustainable transport measures around Morecambe Bay | Reported increase in sustainable transport measures around Morecambe Bay | | Target infrastructure delivery in critical areas. Promote and publicise opportunities to utilise sustainable transport (Travel Plans etc.) |
| | Promoting the delivery of Lancashire County Council’s Cycling and Walking Strategy by improving access across the district and supporting the development and enhancement of an integrated transport network, including footpaths and cycleways and making use of existing features such as Lancaster Canal | Strategic Policies & Land Allocations DPD: CC1, SP2, SP3, SP6, SP10,SG4, SG7, SG8,SG9, SG10, SG11, EC2, T2, T3 Development Management DPD: DM57, DM58, DM60, DM61, DM63 & DM64 | See Indicators set out in Lancashire Cycling and Walking Strategy | See milestones set out in the Masterplan | Failure to meet targets set out in Lancashire Cycling and Walking Strategy | Work with the County Council to address identified issues. |
| | Promoting the delivery of the Lancaster District Highways and Transport Masterplan, prepared by Lancashire County Council, to encourage sustainable travel and deliver improvements in the local transport network | Strategic Policies & Land Allocations DPD: SP2, SP3, SP6, SP10, SG4, SG7, SG8, SG9, SG10, SG11, EC2, T1, T2, T3, T4 Development Management DPD: DM64 | See projects set out in the Masterplan | See milestones set out in the Masterplan | Failure to deliver projects identified within Masterplan | Work with the County Council to help deliver identified projects. |
| | Improving rural accessibility including improved broadband access in rural areas | Strategic Policies & Land Allocations DPD: CC1 SP9 Development Management DPD: DM15, DM48, DM59 | Number of parishes served by B4RN Broadband Improved BT Broadband to Rural Areas/Exchanges | Increase in parishes/properties supplied with fast Broadband | Year on year increase in parishes/properties served | Identify the problems and causes of variants and identify measures to address them Work with key partners to identify potential solutions |
| | Retaining a sufficient level of parking within the main urban centres of the district | Strategic Policies & Land Allocations DPD: CC1, SG4, SG5, SG6, DOS1, DOS6, T1, Development Management DPD: DM62 & DM63 | Number of parking spaces located within Lancaster, Morecambe and Carnforth town centres | Maintain sufficient spaces to sustain the economic vitality of town centres. | Continuing trend of closures of town centre businesses | Traffic management within our town centres will be an important issue in terms of encouraging the use of sustainable modes of transport. We will need to work with the County Council in order to find the right level of parking and monitor impacts of any changes on the vitality of our town centres. |

APPENDIX H

| Table list number (for internal use only) | Ref No | NAME | ORGANISATION | DPD, GBI, CIL OR VA | CHAPTER | POLICY | PARA | SUPPORT / OBJECT/ GENERAL COMMENT | SUMMARY OF RESPONSE | LCC RESPONSE & SUGGESTED AMENDMENT BY OFFICER | ACTION NEEDED? | ACTION FOR GBI STRATEGY NEEDED? |
|---|-----------|--------------|--|--|---------|--------|------|-----------------------------------|--|---|----------------|---------------------------------|
| 1 | _001/01 | Harry Tonge | Steven Abbot Associates on behalf of Russell Armer Homes and Genesis_Homes | Part One Strategic Policies and Land Allocation DPD and Part Two Developmen t Management DPD | - | - | - | General comment | Endorse representations made by Home Builders Federation (HBF). | Comments noted. | No | No |
| 2 | _001/02 | Harry Tonge | Steven Abbot Associates on behalf of Russell Armer Homes and Genesis_Homes | Part Two Developmen t Management DPD | 9 | DM30a | 9.16 | Object | Recognise need to address climate change. Supports comments made by HBF in relation to policy DM30a but have particular concerns about potential implications of the Local Plan setting requirements that go in a different direction to that of the Government. It is unnecessary for planning policy to set out requirements for matters which are regulated through building regulations and other legislation. | Comments noted. In its response to the comments received in respect of the Future Homes Standard Consultation, the Government states at paragraph 2.39, ‘Local authorities have a unique combination of powers, assets, access to funding, local knowledge, relationships with key stakeholders and democratic accountability. This enables them to drive local progress towards our national climate change commitments in a way that maximises the benefits to the communities they serve.’ The Government clarifies at paragraph 2.40 that local planning authorities will retain powers to set local energy efficiency standards for new homes. We consider that our emerging approach will ultimately align with the aims of the future changes to national policy and building regulations. The approach will ensure that new development in Lancaster achieves central and local government energy efficiency measures in the most cost effective way to ensure the wider policy aims are not compromised. | No | No |
| 3 | _001/03 | Harry Tonge | Steven Abbot Associates on behalf of Russell Armer Homes and Genesis_Homes | Part Two Developmen t Management DPD | 9 | DM34 | 9.30 | Object | Amendments to this policy include a requirement for post construction certification of drainage schemes. Fully understand and support need for effective surface drainage to be included in all new development. However, have significant concerns, based on experience in other areas, about the requirement for post construction certification once a drainage scheme has been implemented. Question need for such certification when planning conditions require implementation of approved drainage strategy and the Council could take action against failure to do so. Proposed approach would mean individual dwellings need ‘singing off’ by the planning department before sales can be completed, leading to substantial delays. | Comments noted. While a local planning authority may take action where a developer fails to implement an approved drainage scheme, the failures do not necessarily come to light until problems arise. These may be after a developer has completed and left the site. Action at that stage would generally need to be taken against homeowners who would bear the reasonability of resolving issues. Further detail about the post construction certification will be included within an SPD following engagement with stakeholders. The timing of submission can be undertaken on an agreed phasing basis rather than plot by plot basis but ensuring certification is agreed before a site is completed. | No | No |
| 4 | _002a/01/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part 1 Strategic Policies & Land Allocations DPD | - | - | - | Support/General comment. | Generally supportive of Council’s intentions to explore the opportunities in the Local Plan to improve climate change mitigation and adaptation. However wouldn’t support any amendment that would unreasonably or unnecessarily threaten the viability or deliverability of the North Lancaster Strategy site. Supports Councils decision to make no changes to housing requirement as part of the review, but critical amendments and additional policies do not threaten viability or deliverability of housing sites. | Comment noted. | No | No |
| 5 | _002a/02/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part 1 Strategic Policies & Land Allocations DPD | 6 | CC1 | 6.5 | Support/General comment. | Supports intention of policy CC1. Agrees with use of word ‘appropriately’, implying certain policy requirements should not be applied indiscriminately to all development proposals. Where viability is threatened, other requirements can be relaxed via flexible mechanism. Should also refer to DM58. | Comments noted. | No | No |
| 6 | _002a/03/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part 1 Strategic Policies & Land Allocations DPD | 8 | SP4 | 8.8 | Support | Supportive of changes. | Comments noted. | No | No |
| 7 | _002a/04/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part 1 Strategic Policies & Land Allocations DPD | 10 | SP8 | 10.4 | General comment | Does not object to amendments suggested to this policy in the context of the rationale set-out in the policy sub-text and Appendix X GBI Strategy Addendum document. | Comments noted | No | No |
| 8 | _002a/05/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part 1 Strategic Policies & Land Allocations DPD | 11 | SP9 | 11.1 | Support | Supports the policy in principle. Provides more detailed comments on several DM policies. | Comments noted | No | No |
| 9 | _002a/06/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part 1 Strategic Policies & Land Allocations DPD | 11 | SP10 | 11.7 | General comment | Does not object to the principle of promoting active travel and the policy’s stated intention to encourage a modal shift and a focus on reducing carbon emissions. Have prepared a Comprehensive Masterplan for the North Lancaster Strategic site, informed by an Access and Movement Plan, predicated on desire to maximise potential for residents/employees/visitors to travel by sustainable modes of transport and to ensure a permeable environment is created for pedestrians and cyclists. Critical any additional policy requirements through the plan do not undermine this Masterplan. | Comments noted | No | No |
| 10 | _002a/07/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part 1 Strategic Policies & Land | 15 | SG9 | 15.2 | General comment | Does not object to proposed changes to this policy where they are for consistency/clarity. Makes some detailed comments on policies DM30, DM34 and DM62. | Comments noted | No | No |

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| | | | | Allocations DPD | | | | | | | | |
| 11 | _002a/08/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part 1 Strategic Policies & Land Allocations DPD | 23 | SC4 | 23.16 | General comment | Does not object to changes to proposed policy or insertion of figure 23.2. Acknowledges amendments are based on GBI Strategy, comments provided separately on this. | Comments Noted | No | No |
| 12 | _002a/09/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part 1 Strategic Policies & Land Allocations DPD | 24 | T2 | 24.7 | General comment | Acknowledges amendments to policy T2 seek to prioritise cycling and walking and highlight County's aim to continue to develop this network. It is understood that LTN 1/20 includes guidance, e.g. on maximum gradients for cycle routes, but it is guidance as opposed to standards. Seek confirmation from Council that there would be flexibility in applying this, especially given topography of North Lancaster site. | Comments noted. The DfT's intention is for Local Authorities to adopt LTN1/20 as standards. We can adopt the cycle parking standards but on highways related elements we anticipate their adoption by the Highways Authority. Policy T2 only has ref to LTN1/20 in terms of supporting people with disabilities. No change required. | No | No |
| 13 | _002a/10/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part 1 Strategic Policies & Land Allocations DPD | 24 | T4 | 24.11 | Object | Concerned that the potential requirement to fund a new or enhanced bus service for up to 10 years could have a significant impact on viability. Also, the provision of such a service from first occupation, when a development would generate very little demand for travel, would not, in any case, be the best use of funding. Not possible in all cases of a current deficiency, to provide new or enhanced services. This often requires public transport operators to be supportive of, and willing/able to provide additional services. In our experience, a lack of willingness/ability from such providers renders new services unimplementable, even with willing developers, local planning authorities and highways authorities. A bespoke package of sustainable measures should be developed on a site-by-site basis, rather than a 'one size fits all' approach, and this policy wording should omit reference to specific requirements of public transport provision. | Likely to be viability issues for 10yrs – policy to be amended to provide a more flexible approach. | Yes | No |
| 14 | _002a/11/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part Two Development Management DPD | 4 | DM3 | 4.24 | General comment | Acknowledges amendments to clarify that First Homes will form part of the affordable homes for sale provision. Notes amendments to paragraph 4.31 to ensure consistency with PPG. | Comments noted. | No | No |
| 15 | _002a/12/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part Two Development Management DPD | 7 | DM27 | 7.20 | General comment | Acknowledges reference to DM43 – comments on this policy below. Acknowledges additional text in paragraphs 7.21 and 7.22. Have prepared comprehensive Masterplan for North Lancaster Strategic site, including GBI plans. Policy requirements proposed through the review should not undermine the delivery of this Masterplan which has been prepared with stakeholders and submitted with planning application. | Comments noted. | No | No |
| 16 | _002a/13/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part Two Development Management DPD | 9 | DM29 | 9.5 | Object | Does not object and is supportive of principle of the review. However, does seek to introduce additional policy requirements that could threaten viability/delivery of housing. So there must be a flexible and robust mechanism where requirements can be relaxed if viability is threatened. Should be reference to this in DM29 or sub-text. | The viability impact of the measures referred to in the policy with regard to the design of buildings for energy efficiency (detail within policy DM30a) and biodiversity net gain have been tested within the CELPR Viability Assessment. The costs arising from these elements are consistent with requirements being implemented by central government. Other measures are capable of being designed into schemes without significant impact on viability. | No | No |
| 17 | _002a/14/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part Two Development Management DPD | 9 | DM30a | 9.16 | Object | Replicates contents of the updated Building Regulations which are due to come into effect in June 2023. So has no objection in principle. But the revised Local Plan is likely to be adopted Autumn 2022, and based on detail in DM30a the stated requirements will be implemented before the updated Building Regulations come into force, which would not be acceptable and so object to this. Object for 3 reasons: Unclear how the more extensive/onerous requirements will be achieved in practice, transition arrangements in Building Regs have been primarily designed to allow developers to prepare for achieving new requirements, and the Council's approach of speeding up this transition threatens the delivery and/or viability of housing as most developers are unlikely to be in a position before June 2023 to deliver the requirements viably. Thus table of transition arrangements in policy should be removed and text added to say 'Carbon reduction requirements should accord with adopted Building Regulations'. Council's approach also risks being unsound if not consistent with NPPF paragraph 35. Measures proposed in policy DM30a may be secured by condition but PPG warns against other regulatory requirements, such as Building Requirements. Not being relevant as planning condition. | The proposed transition arrangements for the Building Regulations uplift require building/initial notices or plans to be deposited by June 2022 and commencement of individual dwellings by June 2023. The requirements of DM30a will only apply to schemes granted planning permission post adoption of the CELPR. There is usually a lapse between a planning permission being granted and commencement of individual buildings. It is therefore unlikely that there will be significant difference in timescale for compliance between the proposed Building Regulations and policy DM30a. The proposed policy will have been available to developers for over a year between publication of the Regulation 18 plan and adoption. The weight of the policy will increase throughout the process. It is therefore considered that developers will have an appropriate timescale to transition between the 2013 Building Regulations and the standards to be required by the Building Regulation uplift and policy DM30a. In its response to the comments received in respect of the Future Homes Standard Consultation, the Government states at paragraph 2.39, 'Local authorities have a unique combination of powers, assets, access to funding, local knowledge, relationships with key stakeholders and democratic accountability. This enables them to drive local progress towards our national climate change commitments in a way that maximises the benefits to the communities they serve.' The Government clarifies at paragraph 2.40 that local planning authorities will retain powers to set local energy efficiency standards for new homes. The PPG (paragraph: 003 Reference ID: 6-003-20140612) provides examples of how local plans can address climate change. These include promoting low carbon design approaches to reduce energy consultant. Paragraph 154 of the NPPF states, 'New development should be planned for in ways that: b) can help reduce greenhouse gas emission, such as through its design.' The requirements of policy DM30a accord with the PPG and the NPPF. | No | No |
| 18 | _002a/15/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part Two Development Management DPD | 9 | DM30b | 9.16 | Object | No major objection to proposed policy wording as it appears consistent with optional requirement set through Building Regulations Requirement G2. But should be noted that this is an optional requirement. Where the Local Plan Review seeks to introduce additional policy requirements that could threaten viability | The impact of the water efficiency measures upon viability is negligible there is therefore no justification for relaxation. | No | No |

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| | | | | Management DPD | | | | | should be a robust and flexible mechanism where this can be relaxed. So this policy should reference the relaxing of requirements on viability grounds. | | | |
| 19 | _002a/16/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part Two Development Management DPD | 9 | DM30c | 9.44 | Object | Supports the wording of Policy DM30c in that principles 1 and 2 are subject to the phrases “wherever possible” and “where appropriate” respectively. However, would not support an indiscriminate policy requirement for re-using and recycling all materials arising through demolition and refurbishment, or the incorporation of green/blue roofs and/or walls within developments. Any requirement proposed must include an appropriate mechanism to relax the requirement on viability grounds. Supports use of local suppliers, renewable and/or low carbon materials and modern methods of construction, but where such additional policy requirements could threaten viability should be a robust and flexible mechanism in place so this can be relaxed and wording to this effect added into the policy. Seeks confirmation from the Council that the requirement for proposals for major development to be “accompanied by a site waste management plan setting out how site waste will be managed during the construction phase”, can be conditioned and would not be required at the point at which planning applications are submitted to the Council. | The policy is phased in a way which requires developers to demonstrate how they have taken the principles into account, where these cannot be met a developer would need to justify this within the submission. It therefore includes flexibility where necessary. The policy includes flexibility in respect of the reuse of materials as it refers to ‘wherever possible’. The policy has been rephased to allow for a site waste management to be addressed by condition. | Yes | No |
| 20 | _002a/17/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part Two Development Management DPD | 9 | DM31 | 9.46 | General comment | Notes supporting text has been amended. Reserves right to comment on EV SPD. Notes changes to paragraph 9.11 and where the plan seeks to introduce additional policy requirements that could threaten viability should be a robust and flexible mechanism where this can be relaxed. So this policy should reference the relaxing of requirements on viability grounds. Notes the amendments proposed to paragraph 9.12 of Policy DM31, which include the consideration of the WHO Air Quality Standards alongside the national guidelines. At present, the WHO guidelines are not considered within the Air Quality Standards Regulations (2016) and are not UK and EU legislation. As such, it is Taylor Wimpey’s understanding that Air Quality objectives outlined within Air Quality Standards Regulations (2016) for NO2, PM10 and PM2.5 will apply, until there are any legislative changes. | Comments noted. It should be noted that the content of the policy has not been amended, therefore there will be no impact on viability arising. Recognise that WHO standards are not legislation hence why Council only seeks them to be considered, and not a specific requirement. | No | No |
| 21 | _002a/18/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part Two Development Management DPD | 9 | DM33 | 9.19 | Object | Has some concerns regarding proposed amendments and reserves right to comment at the appropriate time. Where the Local Plan Review seeks to introduce additional policy requirements that could threaten viability should be a robust and flexible mechanism where this can be relaxed. So this policy should reference the relaxing of requirements on viability grounds. | Comments noted. It is not considered that the amendments will have a significant impact on viability. | No | No |
| 22 | _002a/19/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part Two Development Management DPD | 9 | DM34 | 9.30 | Object | No significant objection to proposed amendments. But where the Local Plan Review seeks to introduce additional policy requirements that could threaten viability should be a robust and flexible mechanism where this can be relaxed. So this policy should reference the relaxing of requirements on viability grounds. | Ensuring that new development treats water in a sustainable way accords with the NPPF, PPG and is considered a priority. When well designed, the approach proposed can also contribute to the biodiversity net gain requirements to be required by central government, open space requirements and placemaking minimising the impact on viability. The policy does allow for exceptions where the approach is not feasible but it is not considered necessary to specifically allow for exceptions for viability reasons. | No | No |
| 23 | _002a/20/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part Two Development Management DPD | 9 | DM35 | 9.51 | General comment | Recognises that changes have been made to Policy DM35 for the stated purpose of clarifying the need for developers to demonstrate adequate water supply and wastewater capacity. Does not object to the amendments proposed to Policy DM35. Requirement for water efficiency in non-residential buildings has been moved to Policy DM30b- have provided comments on this policy. | Comments noted. | No | No |
| 24 | _002a/21/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part Two Development Management DPD | 9 | DM36 | 9.57 | General comment | Does not object to amendments. | Comments noted. | No | No |
| 25 | _002a/22/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part Two Development Management DPD | 9 | DM35 | 9.51 | General comment | Acknowledges that the amendments proposed to Policy DM43 are largely based on the GBI Strategy – separate comments on which have been provided. Have prepared comprehensive Masterplan for North Lancaster Strategic site, including GBI plans. Policy requirements proposed through the review should not undermine the delivery of this Masterplan which has been prepared with stakeholders and submitted with planning application. | Comments noted. | No | No |
| 26 | _002a/23/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part Two Development Management DPD | 11 | DM45 | 11.34 | Object | Supports the planting of new trees but would not support additional policy requirements that could threaten viability should be a robust and flexible mechanism where this can be relaxed. So this policy should reference the relaxing of requirements on viability grounds. Supports the phrase ‘to take place where appropriate’. Reserves right to comment on the Council’s District Wide Tree Strategy. | Comments noted. | No | No |
| 27 | _002a/24/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part Two Development Management DPD | 14 | DM57 | 14.16 | Object | Acknowledges the proposed amendments, which seek to promote the delivery of low carbon development and the delivery of modal shift towards more sustainable forms of transport. Have prepared a Comprehensive Masterplan for the North Lancaster Strategic Site to accompany current planning application, which includes an Access and Movement Strategy for the Strategic Site, which is predicated on the desire to maximise the potential for residents/employees/visitors to travel by sustainable modes of transport and to ensure a permeable environment is created for pedestrians and cyclists, and an Access and Movement Plan. Critical any additional policy requirements don’t undermine viability/deliverability. | Comments noted. | No | No |
| 28 | _002a/25/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part Two Development Management DPD | 15 | DM58 | 15.2 | General comment | Welcomes the recommendation for Strategic Sites to be Ezero rated with regard to CIL. However, reserves the right to comment further if the Council proposes to introduce a CIL. At present Policy DM58 allows a developer to ‘submit a Financial Viability Appraisal to ensure the viability and deliverability of a development’. Taylor Wimpey supports this aspect of the policy and it is essential that this principle remains an integral part of Policy DM58. However, the policy text is proposed to be amended to state that, “Where a developer is seeking to reduce contributions or affordable housing provision, they must submit a Financial Viability Assessment at the application stage...”. This statement implies that only developer contributions or affordable housing provision can be negotiated and, therefore, that the additional policy requirements that are proposed as part of the Climate Emergency Review of the Local Plan, such as those relating to sustainable design and climate change are non-negotiable and the proposed amendments to the plan are prioritising climate change and sustainability over the provision of affordable housing and other developer contributions. Taylor Wimpey requests that the Council confirms the position on this and, if correct, makes this clear within the supporting text to Policy DM58. Council then needs to take a pragmatic and reasonable approach to viability, particularly on physically challenging sites, or where developments can help deliver additional community benefits that are beyond the policy requirements in the Local Plan or the requested contributions to make proposals acceptable in planning terms. For example, there is potential for the North Lancaster Strategic site to deliver Extra Care provision, which is not called for by the adopted policies SG9 or SG10 but is a key priority of the Council. | The policy and text relate specifically to infrastructure matters subject to planning obligations. It is therefore appropriate that the reference to viability assessments within the policy refers to these matters only. | No | No |

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| 29 | _002a/26/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part Two Development Management DPD | 15 | DM59 | 15.21 | General comment | Refer to representation made by Roger Hannah to CELPRVA. Supports the amended policy text in that "Where FFTP cannot be achieved, developers will be expected to support the delivery of the most viable high-speed connection". However, Taylor Wimpey would not support any policy requirement if it threatened the viability and/or deliverability of the North Lancaster Strategic Site or housing sites in general. | Comments noted. | No | No |
| 30 | _002a/27/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part Two Development Management DPD | 16 | DM60 | 16.6 | General comment | Does not object to the amendments proposed to Policy DM60. However, Taylor Wimpey would not support any amendment that removes the following statement, "Where proposals are not able to achieve this, it must be clearly demonstrated that significant impacts can be addressed through the preparation of a Travel Plan in accordance with Policy DM63." Detailed comments are made in relation to Policy DM63. | Comments noted. | No | No |
| 31 | _002a/28/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part Two Development Management DPD | 16 | DM61 | 16.10 | General comment | Acknowledges the importance of the role of cycling and walking and that it is already emphasised in the existing adopted policy. Notes that reference to LTN 1/20 has now been included within Policy DM61. However, it is understood that LTN 1/20 includes guidance, as opposed to standards. Therefore, Taylor Wimpey would seek confirmation from the Council that there would be flexibility in applying this. Reserves right to comment on LCWIP at an appropriate time. | Comments noted. The DfTs intention is for Local Authorities to adopt LTN1/20 as standards. We can adopt the cycle parking standards but on highways related elements we anticipate their adoption by the Highways Authority. Policy DM61 refers to Section 14 of LTN 1/20 which provides general design guidance and not specific standards. | No | No |
| 32 | _002a/29/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part Two Development Management DPD | 16 | DM62 | 16.21 | General comment | Notes that reference to LTN 1/20 has now been included. It is understood that LTN 1/20 includes guidance, for example on maximum gradients for cycle routes. Nevertheless, it as the LTN 1/20 provides guidance, as opposed to standards, Taylor Wimpey would seek confirmation from the Council that there would be flexibility in applying this, particularly considering the topography of certain sites. Has no significant objection to amendments to this policy, but where the Local Plan Review seeks to introduce additional policy requirements that could threaten viability should be a robust and flexible mechanism where this can be relaxed. So this policy should reference the relaxing of requirements on viability grounds. Does not object to policy being amended to include that garage provision should include internal space of at least 6m x 3m and accommodate appropriate cycle storage. No objection to EV requirements stated. However, seeks clarification from the Council as to the specification that will be required for charging points as this could have an impact on viability or electricity network capability. | Comments noted. The DfTs intention is for Local Authorities to adopt LTN1/20 as standards and we have incorporated them within Appendix E. We can adopt the cycle parking standards but on highways related elements we anticipate their adoption by the Highways Authority. Further details and guidance on EV's will be set out in the EV SPD that will run alongside Regulation 19 of the Local Plan. EV specifications have also been set out in the Viability Assessment underpinning this review. | No | No |
| 33 | _002a/30/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part Two Development Management DPD | 16 | DM64 | 16.34 | General comment | Supports the need for such contributions to be reasonable and directly related to the development proposed. However, Taylor Wimpey would not support any infrastructure requirement that would threaten the viability and/or deliverability of the site. Where the Local Plan Review seeks to introduce additional policy requirements that could threaten viability should be a robust and flexible mechanism where this can be relaxed. So this policy should reference the relaxing of requirements on viability grounds. Reserves right to comment on forthcoming Highways and Transport Masterplan. | Comments noted. | No | No |
| 34 | _002a/31/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Community Infrastructure Levy | - | - | - | General comment | Welcomes the recommendation for strategic sites to be Ezero rated with regard to CIL. References section 7 of Cushman and Wakefield's response to CCLPRVA and concerns about CIL – wait for Government to confirm their future plans and don't believe CIL should be introduced. Reserves right to comment further if Council proposed to introduce a CIL. | The Governments proposals are taking time to come forward with no detail or date available as yet. It is not appropriate to delay consideration. The comments will be given due consideration as the City Council considers the scope and role of CIL within the district. | No | No |
| 35 | _002a/32/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | GBI Strategy | - | - | - | General comment | A Comprehensive Masterplan has been prepared for the North Lancaster Strategic Site, which is being considered as part of the hybrid planning application for the Phase 1 of the Strategic Site. A detailed strategy in relation to ecology and Green and Blue infrastructure is provided within the Comprehensive Masterplan, including Green Infrastructure and Indicative Blue Infrastructure plans. These demonstrate a scheme which is complementary to the Lancaster GBI Strategy, notably the mapped Green Blue Corridor and the associated KKP Open Space. The proposed development interface with the Lancaster Canal incorporates a landscape buffer which has been agreed with GMEU, and built form is proposed to actively front and create an attractive setting to the canal route. Has no significant objection to the GBI Strategy itself but notes that it has informed several proposed policy amendments/additions in CELPR. For any additional policy requirements introduced by the CELPR that seek to introduce additional policy requirements that could threaten the viability and/or delivery of housing, there must be a robust and flexible mechanism whereby these additional requirements and/or other requirements (such as affordable housing or other developer contributions) can be relaxed if viability is threatened. Although agrees in principle with the incorporation of GBI on housing sites, such infrastructure would need to be proportionate to the development proposed and take into account site-specific considerations. | Comments noted. | No | No |
| 36 | _002a/33/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part One Strategic Policies and Land Allocation DPD and Part Two Development Management DPD | - | - | - | General comment | NPPF references need to be updated to 2021 version | Comments noted and amendments will be made. | Yes | No |
| 37 | _002a/34/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part One Strategic Policies and Land Allocation DPD and Part Two Development Management DPD | - | - | - | General comment | Reference to the "Bus Rapid Transit System" has been replaced within the draft DPDs with the phrase "Better Buses Scheme", it is understood from Topic Paper 3 that this is to take account of published National Bus Strategy. Reserves right to comment on the Better Buses scheme at the appropriate time. | Comments noted. | No | No |

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| 38 | _002a/35/ | Paul Nellist | Avison Young on behalf of Taylor Wimpey | Part Two Development Management DPD | 15 | DM58 | 15.2 | General comment | Has frequently referenced importance of this policy which includes a proposed mechanism for relaxing requirements where viability is threatened. Relevant new policies/amendments to policies that seek to introduce additional requirements on developments should refer to Policy DM58 either within the policy wording or sub-text. The Council needs to clarify whether the viability flexibility mechanism in Policy DM58 applies to all of the new policy requirements that this review is seeking to introduce in relation to climate change and sustainability. If so, and any of the new proposed requirements can be relaxed on viability grounds, Policy DM58 and other relevant policies should state this. If not, then the Council must be willing to take a pragmatic and reasonable view to applying the mechanism in Policy DM58 where the viability and/or deliverability of housing schemes is threatened. | The policy relates specifically to infrastructure and the text to those matters controlled by planning obligations. It is therefore appropriate that the reference to viability assessments within the policy refers to these matters only. Where VAs may apply they are referred to in specific policies. | No | No |
| 39 | _002b/01-13/ | Laura Mackay | Roger Hannah Ltd on behalf of Taylor Wimpey | Viability Assessment | - | - | - | Object | See Viability Assessment Responses at the end of this table. | See Viability Assessment Responses at the end of this table. | No | No |
| 40 | _002c/14/ | Laura Mackay | Roger Hannah Ltd on behalf of Taylor Wimpey | Community Infrastructure Levy | - | - | - | Object | The Council should wait for the government to confirm their plans for a levy. We do not believe should be introduced as there is no robust evidence to demonstrate that CIL will not adversely impact on development viability. | The government has paused its plans for change. It is not appropriate to place decisions on hold for an undeterminable period. The comments will be given due consideration as the City Council considers the scope and role of CIL within the district. | No | No |
| 41 | _003a/01 | Gavin Rutter | Canal & River Trust | GBI Strategy | - | - | - | Support | Trust welcomes creation of GBI Strategy. Lancaster Canal is an important GBI asset, multifunctional in nature, connecting all of 6 key themes. Pleased canal is identified as a strategic GBI corridor on interactive map. | Support noted. | No | No |
| 42 | _003a/02 | Gavin Rutter | Canal & River Trust | GBI Strategy | - | - | - | Support | Welcome reference to canal as an important wildlife corridor. New development close to canals can protect and enhance this role through sensitively designed landscaping schemes and design of open spaces within developments. | Support noted. | No | No |
| 43 | _003a/03 | Gavin Rutter | Canal & River Trust | GBI Strategy | - | - | - | General comment | Canal provides a valuable car-free environment which lends itself to active travel. Where appropriate, the Trust supports ambitions to identify potential access improvements, towpath surfacing and wayfinding, especially around the Lancaster area. Trust happy to work with Council to identify and map potential access points along canal. 'Key issues' on p.114 highlights challenges in providing shared spaces and Trust supports efforts to encourage users to share space considerably. Bullet point 4 notes uncertainty as to who has priority access along the towpath, indicating the Trust doesn't prioritise, but the Trust has developed a towpath code giving priority to pedestrians. Section needs to be updated to reflect this. | Comments noted. Will look into mapping access points onto canal. Will make amendments in Strategy in relation to priority in shared spaces. | No | Yes |
| 44 | _003a/04 | Gavin Rutter | Canal & River Trust | GBI Strategy | - | - | - | General comment | Canal has the potential to accept surface water discharge agreements, subject to commercial agreement with the Trust. Trust is not a statutory drainage authority, but there is the potential to consider new discharges on a case-by-case basis. Trust promotes early engagement and Council may wish to consider the Trust as a key stakeholder in third bullet point under 'Emerging Opportunities'. Also recommend minor rewording of 6 th bullet point for clarity of process for accepting a new discharge to the canal. | Comments noted. Agree Canal and Rivers Trust should be added as a key stakeholder in Water Management emerging opportunities list. Will reword 6 th bullet point for clarity. | No | Yes |
| 45 | _003a/05 | Gavin Rutter | Canal & River Trust | GBI Strategy | - | - | - | General comment | Trust has put forward a project to add into Appendix 4 of GBI Strategy: 'Habitat restoration, Thwaite End Pasture'. | Comments noted. We will explore this further and add to Appendix 4. | No | Yes |
| 46 | _003b/01 | Gavin Rutter | Canal & River Trust | Part Two Development Management DPD | 11 | DM43 | 11.2 | Support | Key to the GBI Strategy should be harnessing the multi-functionality of GBI at both strategic and DM level. Pleased that DM43 makes reference to green and blue spaces, corridors and chains. | Comments Noted. | No | No |
| 47 | _003b/02 | Gavin Rutter | Canal & River Trust | Community Infrastructure Levy | - | - | - | General comment | Wishes to highlight how significant new development in the vicinity of the canal can place extra liabilities and burdens upon the waterway and infrastructure. Can lead to increased use of canal and towpath for active travel. Also, ongoing maintenance costs for maintaining an attractive waterway setting. Being located close to canal can add value to developments. Therefore, is essential that appropriate contributions continue to be secured from developers where appropriate to maintain and improve condition of the infrastructure whether through CIL or S106. | Their comments will be given due consideration as the City Council considers the scope and role of CIL within the district. | No | No |
| 48 | _004/01 | Jon Power | CBRE on behalf of Lancaster University | Part 1 Strategic Policies & Land Allocations DPD | - | - | - | Support | The University is fully supportive of the LCC's aspirations to address the local, national and international climate emergency. As a major civic institution in the District, the University is ready to assist in leading the way in sustainable growth and carbon reduction in line with the climate emergency that was declared by the University 23 rd November 2020; and its commitment to achieving net zero for carbon emissions from electricity and heating by 2030, and net zero from all other emissions by 2035. Lancaster University fully supports a more robust policy framework that allows the planning system deliver sustainable development and to be responsive climate change adaption and mitigation. | Support noted | No | No |
| 49 | _004/02 | Jon Power | CBRE on behalf of Lancaster University | Part 1 Strategic Policies & Land Allocations DPD | 6 | CC1 | 6.5 | General comment | Supports introduction of this policy. However, it is considered that the policy could go further on the robustness of its support for renewable energy as a drive for carbon neutrality and on commitment for Council to work with major institutions to address the CE. Suggested additional criteria (as number 3): 'Supporting, in appropriate locations, new renewable energy and infrastructure projects that will accelerate the move towards a low carbon future'. Adding in another criteria (as number 6): 'Working collaboratively with the District's major institutions, including its Universities, to lead on sustainable growth and development to demonstrate how the Council and these institutions can work together to address the Climate Emergency'. Amend last point to say 'Improving or maintaining the natural functioning of river processes, avoiding placing development in areas at risk of flooding where possible and ensuring new development contributes to reducing flood risk on and of site where feasible'. | The council considers that the proposed amendments to wording would weaken the ambition at the heart of the policy. | No | No |
| 50 | _004/03 | Jon Power | CBRE on behalf of Lancaster University | Part 1 Strategic Policies & Land Allocations DPD | 8 | SP4 | 8.8 | General comment | Notes that only minor changes have been made to Policy SP4. It also notes that Council's supporting documentation for the Scoping Consultation, it sought to explore the opportunity to provide additional "options for economic activity in the district" and if the policy "could make clearer Council's support for such proposals for the growth of...economic sectors in the district". Supports inclusion of Health Innovation Campus in SP4, but its important that any changes to SP4 continues to recognise the delivery of the HIC as critical to the sustainable economic growth of both the Uni and District. | Support noted | No | No |
| 51 | _004/04 | Jon Power | CBRE on behalf of Lancaster University | Part 1 Strategic Policies & Land Allocations DPD | 8 | SP4 | 8.8 | General comment | Additional text to support renewable projects could be incorporated into policy SP4: 'To support transition to a low carbon economy, supporting major renewable energy projects in appropriate locations and where they do not conflict with other policies within the plan'. Renewable energy is essential to sustainable economic growth for the Uni and beyond which should be referenced and strengthened as part of the review of policy SP4. | Comment noted. Agree that the proposed wording will be incorporated as a new bullet point into Policy SP4. | Yes | No |
| 52 | _004/05 | Jon Power | CBRE on behalf of | Part 1 Strategic | 8 | SP4 | 8.8 | General comment | University requests that the Council considers specific reference to Forrest Hills and its surrounds as part of its support for the 'sustainable growth at the district's higher education establishments' (SP4, bullet 6): | Comment noted. Policy SP4 already provides broad support for sustainable growth of the district's higher education | No | No |

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| | | | Lancaster University | Policies & Land Allocations DPD | | | | | '...(including land at the University Health Innovation Campus and where deemed appropriate exploring opportunities for renewable energy and exemplar sustainable development projects that are linked to its existing campus operations, within the wider University Estate). | establishments. Given the high-level nature of this policy there is no need for campus-specific support. This should be made through the application process on a case-by-case basis. | | |
| 53 | _004/06 | Jon Power | CBRE on behalf of Lancaster University | Part 1 Strategic Policies & Land Allocations DPD | 10 | SP8 | 10.4 | Support | University supports the protection and enhancement of the District's GBI network, and the overarching objectives of the proposed GBIS. In particular it supports the GBIS' recommendations to explore the potential to improve connectivity between the University and the city centre (GBIS, p.115). | Support noted. | No | No |
| 54 | _004/07 | Jon Power | CBRE on behalf of Lancaster University | Part 1 Strategic Policies & Land Allocations DPD | 10 | SP8 | 10.4 | General comment | Quotes additional text to policy SP8 r.e. GBI. Whilst the Uni supports the overarching objectives of this policy in general, it is unclear in the GBIS or associated mapping (or Policies Map) the specific areas that are subject protection and, more precisely, how policy SP8 (or other GBIS linked policies) should be interpreted in the context of the GBIs in terms of its conclusions, recommendations and interactive mapping (given it's a live document). It would be helpful for the Council to clarify the position on this more clearly in the explanatory text to this policy to better understand to what level and how this protection in these green and blue corridors is applied – in order to ensure that sustainable new projects in suitable locations are not prohibited. | Comment noted. It is important to note that the GBI interactive map does not allocate or designate land like a Local Plan Policies Map does. The purpose of the GBI map is to act as a useful tool to inform and guide the design of development proposals and subsequently act as a guide for the relevant planning policies used to determine them. Additional wording will be added into the supporting text to clarify this. | Yes | No |
| 55 | _004/08 | Jon Power | CBRE on behalf of Lancaster University | Part 1 Strategic Policies & Land Allocations DPD | 11 | SP10 | 11.7 | General comment | Supports the delivery of sustainable development and of developments and infrastructure that promote sustainable modes of travel. However, policy SP10 should reflect the critical importance of major infrastructure projects in the District with the potential to unlock sustainable development and support new sustainable travel infrastructure. Strongly supports realignment of J33 of the M6 – critical that HIF delivers this, with wider sustainable growth of Lancaster. The university requests the need for the realignment of J33 is clearly and explicitly articulated in the CELPR in policy SP10 and elsewhere in the plan (T1, T2 and T4) to demonstrate that this infrastructure investment and sustainable growth are intrinsically linked during the next Plan Period. | Comment noted. It is important to note that the plan should be read as a whole. Jn33 is referenced in SP10 supporting text. It is also included in Policy SG1 and SG3 that relate to South Lancaster. Jn 33 is also referenced in Policy T1 supporting text. | No | No |
| 56 | _004/09 | Jon Power | CBRE on behalf of Lancaster University | Part 1 Strategic Policies & Land Allocations DPD | 23 | SC4 | 23.16 | General comment | Notes that the 'River Conder' is proposed to be added to the Policies Map as a Green and Blue corridor. Appendix X notes that in relation to the River Conder, the lower stretches of the river (BGV area), recreation and accessibility could be improved. The University is generally supportive of a strategy to enhance GBI across the District, and in improving accessibility in the lower stretches of the River Conder. However, this policy and the GBI Strategy needs to be cognisant of the District's renewable energy aspirations and the areas that are suitable for renewable energy generation (such as lower stretches of River Conder). It should be made clear that renewable energy projects in appropriate locations (as set out in DM53) are not precluded from development in these corridors where they comply with other policies in CELPR. Renewable energy could be captured in the GBI themes. Sustainable development of existing active uses within green corridors (e.g. Forest Hills Conference Cente) have potential to improve accessibility and use of these areas and sustainable development of these types of uses should be safeguarded. Would be useful to fully understand the scope of this policy and relationship with GBI Strategy and mapping. Will the areas afforded protection be specifically identified on a revised CELPR Policies Map and how will this be applied to surrounding land uses. | Comment noted. It is important to note that the plan is to be read as a whole. The purpose of this Local Plan Review is to address the Climate Emergency and so this is reflected in the policies, which are designed to work together, and subsequently is the approach that will be adopted when decision making to ensure existing GBI and future opportunities for enhancement/extension are given careful consideration. SC4 seeks to identify the key GBI corridors and chains as opposed to specifically designate land, to highlight the strategic importance these make to the wider network. The corridors and chains identified through this policy are therefore indicative, as opposed to allocating/designating specific areas of land. Their purpose is to highlight the importance of these corridors and chains at a strategic level and the contribution they make to the wider network, and to recognise the importance of the connectivity of green and blue spaces and their multifunctionality. Amendment needed to change reference to Appendix X. | Yes | No |
| 57 | _004/10 | Jon Power | CBRE on behalf of Lancaster University | Part Two Development Management DPD | 9 | DM30a | 9.16 | Support | Supports high standards of sustainability in new development to meet the challenges of climate change. The HIC phase one campus has been built to BREEAM excellent standard and Uni plans to continue this level of sustainability where feasible and viable in new development. | Support noted. | No | No |
| 58 | _004/11 | Jon Power | CBRE on behalf of Lancaster University | Part Two Development Management DPD | 9 | DM30b | 9.16 | Support | Supports strengthening of water efficiency measures in new buildings, including requirement for major non-residential development to incorporate water conservation measures so consumption levels meet BREAAM Excellent standard, where feasible and viable. | Support noted. | No | No |
| 59 | _004/12 | Jon Power | CBRE on behalf of Lancaster University | Part Two Development Management DPD | 9 | DM30c | 9.44 | Support | Supports strengthening policies that promote the sustainable disposal of waste and sustainable methods of construction where possible. In particular, support policy measures that require proposals for major developments to demonstrate how they achieve sustainable and environmentally conscious development, including climate change mitigation and adaptation. | Support noted. | No | No |
| 60 | _004/13 | Jon Power | CBRE on behalf of Lancaster University | Part Two Development Management DPD | 11 | DM43 | 11.2 | General comment | Supports a network of green and blue infrastructure in the District, however, as set out in the comment on Policies SP8 and SC4 of the LADPD, any policies that protect green and blue infrastructure must be clear in how they are applied and must not prevent opportunities for renewable energy generation and sustainable growth. | Comments noted. As noted above, the plan is to be read as a whole. The GBI Strategy is to be used as a tool to inform the design of development to ensure existing GBI and future opportunities for enhancement/extension are given careful consideration. The areas mapped on the GBI interactive map are not formal allocations, just the key GBI corridors/chains from a strategic perspective are identified indicatively in policy SC4 as an indication of their importance as explained above. | No | No |
| 61 | _004/14 | Jon Power | CBRE on behalf of Lancaster University | Part Two Development Management DPD | 13 | DM53 | 13.2 | Support | Pleased that renewable energy has been afforded increased emphasis as part of the CELPR and in Policy DM53. Crucial in addressing national climate emergency. Uni has bold aspirations to deliver further renewable energy infrastructure. Fully supportive of revisions to DM53 and areas suitable for onshore wind and revised map in Figure 13.1. University's existing wind turbine has been very successful in reducing carbon emissions and energy costs. Based on which have an aspiration to develop a second wind turbine. Supports recognition in policy and justification text that national policy position on onshore wind could change. Supports approach to solar and has future solar aspirations on land to east of M6. Supportive of policy framework for other renewables. | Support noted. | No | No |
| 62 | _005/01 | Jackie Copley | CPRE | Part 1 Strategic Policies & Land Allocations DPD | - | - | - | General comment | Promote brownfield first approach to development. We are opposed to the loss of valued open green space. Asked to consider having the CPRE brownfield toolkit link on our website to help people to identify brownfield sites. Shame the review does not revisit site allocations. Asks if there could be more brownfield sites that have become available since plan was adopted. | Comments Noted. The Council's development strategy is a brownfield first approach. The Council has a good record of developing brownfield sites, with few still remaining. The Council has an ongoing call for brownfield sites and the website includes information to help people nominate additions to the Brownfield Register. The register and submissions are regularly reviewed. | No | No |
| 63 | _005/02 | Jackie Copley | CPRE | Part 1 Strategic Policies & Land | - | - | - | General comment | Advocate higher density development in locations that can accommodate it. Adequate Developer contributions need to be agreed to make development sustainable in long term i.e. includes adequate affordable housing for more balanced communities. Concerned that local plans are too easily found out of date by Developers with an interest in building on land never intended for development. Issue with | Comments noted. Opportunity to support high density development and promote sustainable design is included within the Plan. The Council has sought to strengthen these through the review process. | No | No |

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| | | | | Allocations DPD | | | | | Government’s approach – Housing Delivery Test, standard methodology and 2014 ONS statistics. Believes Government should better equip local planning authorities with adequate powers and resources to achieve desirable development outcomes. | The adopted housing requirement is not being revisited as part of the partial review. This Policy and the housing requirement for the district will be re-visited as part of the next Strategic Local Plan Review. | | |
| 64 | _005/03 | Jackie Copley | CPRE | Part 1 Strategic Policies & Land Allocations DPD | 4 | S03 | 4.1 | Support | Agree with changes made to bullets of S03 in relation to protecting, enhancing and extending the connectivity of our green and blue spaces. Retention and planting of hedgerows is very important due to the value of them to the landscape and biodiversity. Providing homes and corridors for wildlife and stitching the patchwork of our countryside. Also capturing carbon to help tackle the climate crisis. | Support noted. | No | No |
| 65 | _006/01-41 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield prepared on Behalf of a Developer Consortium: Story Homes, Gleeson Homes, Persimmon Homes, Oakmere Homes, Eric Wright Group, Taylor Wimpey, Redrow Homes, Rowland Homes | Viability Assessment | - | - | - | Object | See Viability Assessment Reponses at the end of this table. | See Viability Assessment Reponses at the end of this table. | No | No |
| 66 | _007a/01 | Claire Pegg | Cushman & Wakefield on behalf of L&K Group | Part One Strategic Policies and Land Allocation DPD and Part Two Development Management DPD | - | - | - | Object | Significant changes need to be made to ensure the policies are justified, effective and can be considered sound. Attention is drawn to the sperate representations made with respect to the viability assessment (Ref no 007b). | See Viability Assessment Reponses at the end of this table. | No | No |
| 67 | _007a/02 | Claire Pegg | Cushman & Wakefield on behalf of L&K Group | Part One Strategic Policies and Land Allocation DPD | 6 | CC1 | | Support | The principles set out in the new policy CC1 are considered acceptable. We note that in most instances, with the exception of “ensuring” biodiversity net gain, the phrasing sets broad ambitions rather than absolute target levels. This positively creates an element of flexibility to ensure that applications can respond in the 2 most appropriate ways to climate change and environmental sustainability recognising site and scheme specific characteristics. | Comments noted | No | No |
| 68 | _007a/03 | Claire Pegg | Cushman & Wakefield on behalf of L&K Group | Part One Strategic Policies and Land Allocation DPD | 18 | EC3 | | Support | The minor changes are acceptable | Comments noted | No | No |
| 69 | _007a/04 | Claire Pegg | Cushman & Wakefield on behalf of L&K Group | Part One Strategic Policies and Land Allocation DPD | 19 | T4 | | Object | The relocated auction mart will generate high levels of traffic movement due to the specific activities. It is not realistic to expect the majority of visitors to travel by public transport. As such it would not be reasonable to expect the development to contribute towards the provision or enhancement of services. The wording should be changed to insert ‘where appropriate’ within the first 2 sentences. | It is proposed to amend the policy to ensure services are provided/enhanced where necessary and the funding requirement for contributions will be determined on a case by case basis. | Yes | No |
| 70 | _007a/05 | Claire Pegg | Cushman & Wakefield on behalf of L&K Group | Part Two Development Management DPD | 9 | DM29 | 9.2 | Object | The policy should clarify that the principles relate to residential development only to ensure consistency with the background text. It is not appropriate to require food growing space and on site composting in all developments. | The policy does relate to all development and is worded as such. The background text has been amended to remove reference to residential. The policy sets out principles and these may not all be appropriate ion every case. | Yes | No |
| 71 | _007a/06 | Claire Pegg | Cushman & Wakefield on behalf of L&K Group | Part Two Development Management DPD | 9 | DM30a | | Object | The carbon reduction requirement of 31% is acceptable provided that the requirement is not in place prior to the changes to the building regulation requirements. The requirement from 2028 to delivery net zero is above national requirements and will significantly affect viability. | In its response to the comments received in respect of the Future Homes Standard Consultation, the Government states at paragraph 2.39, ‘Local authorities have a unique combination of powers, assets, access to funding, local knowledge, relationships with key stakeholders and democratic accountability. This enables them to drive local progress towards our national climate change commitments in a way that maximises the benefits to the communities they serve.’ The Government clarifies at paragraph 2.40 that local planning authorities will retain powers to set local energy efficiency standards for new homes. The carbon reduction requirements have been subject to a viability assessment. | No | No |
| 72 | _007a/07 | Claire Pegg | Cushman & Wakefield on behalf of L&K Group | Part Two Development Management DPD | 9 | DM30a | | Object | The requirement for low carbon energy and renewables viability. | The plan should be read as a whole, if a viability assessment is required it is up to the developer to justify the requirement as stated in the nPPG. | No | No |

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| | | | | Management DPD | | | | | | | | |
| 73 | _007a/08 | Claire Pegg | Cushman & Wakefield on behalf of L&K Group | Part Two Development Management DPD | 9 | DM30a | | General Comment | The policy should acknowledge it may be challenging to energy demands in listed buildings. | The heritage policies address this matter. | No | No |
| 74 | _007a/09 | Claire Pegg | Cushman & Wakefield on behalf of L&K Group | Part Two Development Management DPD | 9 | DM30b | | Object | The introduction of the water efficiency requirements could have significant impact on viability. The policy should be amended to state that the requirement should be subject to viability. | The plan should be read as a whole, if a viability assessment is required it is up to the developer to justify the requirement as stated in the nPPG. | No | No |
| 75 | _007a/10 | Claire Pegg | Cushman & Wakefield on behalf of L&K Group | Part Two Development Management DPD | 9 | DM33 | | Object | The requirement for an exception test should be reworded to ensure consistency with the nPPG. | The policy has been reworded for consistency. | Yes | No |
| 76 | _007a/11 | Claire Pegg | Cushman & Wakefield on behalf of L&K Group | Part Two Development Management DPD | 9 | DM57 | | Object | The relocated auction mart will generate high levels of traffic movement due to the specific activities. It is not realistic to expect the majority of visitors to travel by public transport. As such it would not be reasonable to expect the development to contribute towards the provision or enhancement of services. | It is appropriate for high trip generators to encourage the use of sustainable transport. Exceptions to the policy would be considered on their own merits. | No | No |
| 77 | _007a/12 | Claire Pegg | Cushman & Wakefield on behalf of L&K Group | Part Two Development Management DPD | 9 | DM62 | | Object | The policy requirement should be amended to state that the requirement should be subject to viability. | The plan should be read as a whole, if a viability assessment is required it is up to the developer to justify the requirement as stated in the nPPG. | No | No |
| 78 | _007b/01-41 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of L&K Group | Viability Assessment | - | - | - | Object | See Viability Assessment Responses at the end of this table. | See Viability Assessment Responses at the end of this table. | No | No |
| 79 | _008a/01 | Liz Locke | Environment Agency | Part One Strategic Policies and Land Allocation DPD and Part Two Development Management DPD | - | - | - | Support | Supports the review noting that the revised proactive policies will ensure that development is used as an opportunity to deliver positive actions that will help development mitigate and adapt to climate change. | Support noted. | No | No |
| 80 | _008b/01 | Liz Locke | Environment Agency | GBI Strategy | - | - | - | Support | GBI Strategy looks very comprehensive. Interactive map slow to load on old laptop. 'Call for projects' pink dots could do with being made bigger. | Support noted. Amendments to map made | No | Yes |
| 81 | _009/1 | Dr Rachel Marshall | on behalf of Food Futures Partnership | Part One Strategic Policies and Land Allocation DPD and Part Two Development Management DPD | - | - | - | General comment | At FoodFutures we're really pleased to see that this review of the local plan has taken place and to see that climate adaptation and mitigation, including the protection and enhancement of our green and blue infrastructure, will become an integral part of planning decision making. In particular the development of the green and blue infrastructure strategy to support the local plan is an extremely positive and future thinking project which will be essential for actually realising the ambitions set out. Before moving on to a more detailed response to individual policy changes we wanted to highlight a couple of key issues we felt had not been addressed: 1. The strategic priority of food in addressing climate change 2. Economic prosperity and what this means in light of climate change. Whilst it is positive that aspects related to the food system have been incorporated into Local Plan review (in particular in terms of ensuring that food growing spaces are created in new developments and composting areas designed in to deal with food waste) we're disappointed that food is still not recognised as a strategic priority in this District. This is despite calls at a national and international level for food systems to become more localised and resilient. Food is at the heart of our response to climate- our food system is currently responsible for over 30% of carbon emissions and as the climate becomes more unpredictable we need to ensure that our communities have both the skills and spaces needed to ensure our food supply across the district is resilient. Local food is not the only answer but it is a very important part of creating more sustainable and resilient communities. | Support and comments noted. Local food growing importance is highlighted in DM29 and, since the consultation, added supporting text has been included recognising that Lancaster City Council has signed the Glasgow Food & Climate Declaration in November of 2021. | No | No |
| 82 | _009/2 | Dr Rachel Marshall | on behalf of Food Futures Partnership | Land Allocation DPD and Part Two Development | - | - | - | General comment | Lancaster City Council has committed to supporting the development of a local food system that gives equal access to good nutrition and food preparation skills. Our community-led work to develop a local food strategy (https://foodfutures.org.uk/food-strategy/) highlights the desire of local people to create a local food system that reduces negative environmental impacts, is more healthy, fair and resilient in the face of climate challenges. The Food Poverty Alliance action plan is part of this strategy and reflects commitments from a whole range of organisations, including the council, to ensure that everyone in the district has access to enough, healthy, nutritious food. Despite the vital importance of food to the very wellbeing of individuals and societies in the 'Strategic Land Allocations' SPD the phrase 'food' appears five times used only in the context of either foodstore or 'the food and drink offer' in our city retail spaces. There are a wealth of projects now taking place across the district to enable more people to grow, cook, share, sell and eat food together. Whilst our communities have the knowledge, skills and enthusiasm to make this happen, what we often don't have is the space-whether this be urban buildings or peri-urban land. It is exciting to see that new developments will have community food growing spaces built in and we look forward to responding to consultations that emerge around the design of these. However, we need to continue to push for food to be recognised at a strategic level and for it to be expressly included in the strategic vision for the district as set out on pg. 19 of the DPD. | Comments noted. This is out of scope of the CELPR. While, out of scope for the local plan and the CELPR, how land is used in South Lancaster could form part of the AAP. Design policy is addressed in DM29 and forthcoming "Acknowledging the Emergency: Developments built for community, climate, and environmental resilience" SPD. | No | No |
| 83 | _009/3 | Dr Rachel Marshall | on behalf of Food | Land Allocation DPD and Part | 3 | Spatial vision | 3.3 | General comment | If we really want to be ambitious about changing our environmental trajectory then we need to be far more imaginative in our vision for our district in 2031 than is currently laid out in the Strategic Land Allocation DPD Section 3.3 (The Spatial Vision for Lancaster District 2031). | Comments noted. The Strategic Land Allocation is outside of the scope of the CELPR. This could potentially form part of a full plan review however is out of scope for this partial review. | No | No |

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| | | | Futures Partnership | Two Development Management DPD | | | | | 1. Based on the community input to our food strategy process we recommend making the following addition (underlined) in 3.3: “ The district will be recognised as an excellent example of the economic, environmental and ‘community wealth and health’ benefits of localised food supply. The local plan will actively support the development of community and micro-enterprises that supply significant proportions of food required for local communities to access a healthy and fair ‘One Planet’ diet.” 2. A thriving local and regenerative food economy should also be highlighted as an additional bullet point under SO1 [DELIVERY OF A THRIVING LOCAL ECONOMY THAT FOSTER INVESTMENT AND GROWTH AND SUPPORT THE OPPORTUNITIES TO DELIVER THE ECONOMIC POTENTIAL OF THE DISTRICT]. | | | |
| 84 | _009/4 | Dr Rachel Marshall | on behalf of Food Futures Partnership | Part One Strategic Policies and Land Allocation DPD and Part Two Development Management DPD | 4 | SO1 | 4.1 | General comment | In SO1 it would also be valuable to highlight the importance of Land Based Skills in the future as these roles will be essential for delivering the nature-based solutions to climate change, supporting our GBI network as well as future proofing our ability to provide food into the future. The land based skills and food growing sector will also support achieving the final bullet in SO1 around rural job creation. Planning policy should actively facilitate the development of this sector as it does other sectors such as energy, logistics, arts and health. We recommend learning from the Food, Farming and Countryside Commission’s work in Cumbria where they are looking to develop a thriving land-based skills sector. The inclusion of local, small scale and diverse food production into the strategic vision for the district will support the delivery of strategic objectives around a thriving local economy, enhancement of the natural and built environment and the creation of sustainable communities. This has been shown through both academic research and community action, and we would love to see the city council take forwards work that contributes towards our community food strategy. By making local food production a strategic priority it creates opportunities for policy mechanisms that enable smaller and social enterprises to flourish. | Comments noted. SO1 is outside of the scope of the review however could form part of a full plan review at a future date. No action required for the partial plan review. | No | No |
| 85 | _009/5 | Dr Rachel Marshall | on behalf of Food Futures Partnership | Land Allocation DPD and Part Two Development Management DPD | - | - | - | General comment | In particular we would like to see policies that enable: - allocation of land for food growing at a community and small enterprise scale to be considered alongside other strategic land allocations and infrastructure requirements - priority use of agricultural land should be given for more growing sites for agroecological fruit and veg production to serve the city in ways that will increase resilience, reduce food miles, boost rural economic development and build direct connections between eaters, producers and the wider environment and seasons. - certain proportions of town centre retail space made accessible and affordable for social enterprise, micro-enterprise and charitable enterprise who contribute to community wellbeing - local communities to access land and spaces around the district for food growing and community hubs through increasing access to data on land ownership and providing financial and legal support for community asset purchase. - actively resisting any further selling of public assets in the district for short-term financial benefit instead looking at how these assets can be used to support community wealth building and enterprise. | Comments noted. The emerging SPD “Acknowledging the Emergency: Developments built for community, climate, and environmental resilience” will include greater detail as to how the spaces for food growing and local food enterprises can be included in new residential and commercial development. Land allocations are outside of scope of the CELPR. Comments relating to council corporate priorities noted however out of scope of the CELPR. | No | No |
| 86 | _009/6 | Dr Rachel Marshall | on behalf of Food Futures Partnership | Part One Strategic Policies and Land Allocation DPD and Part Two Development Management DPD | 8 | - | - | General comment | Economic Prosperity: We were pleased to note the use of the term prosperity in the place of growth in Section 8 (pg. 35). This reflects evidence that economic growth (measured typically by GDP) does not necessarily bring about increases in prosperity and wellbeing which is what we want our local communities to experience. It is becoming increasingly clear that economic growth cannot be easily decoupled from carbon emissions and resource use- and therefore switching to the idea of prosperity offers more realistic opportunity for reducing carbon emissions and destructive resource use. However, it will be interesting to see a more developed approach to how economic prosperity will be assessed and it would be valuable for this to be both an evidence rich approach but also one that is co-developed with the local community. We would like to see the council share a strategy for incorporating in discussions from Community Conversations completed over the past 18 months to shape any concepts of economic prosperity that emerge and for there to be a clear strategy for community engagement on these and other issues going forwards. In the current DPD this change of phrasing did not translate into many other areas of the document where the economy was discussed. This likely reflects uncertainty in what we mean by prosperity and how we are going to know that the plan is delivering it. We certainly need to figure that out as a community and then embed it within this local plan. | Support and comments noted. SP4 and CC1 have both addressed economic prosperity as policies within scope of the CELPR. | No | No |
| 87 | _009/7 | Dr Rachel Marshall | on behalf of Food Futures Partnership | GBI | - | - | - | Support | Despite our disappointment that the strategic importance of food in our response to the climate emergency has not been recognised in the Strategic Land Allocations DPD we are heartened to see its inclusion as a key part of our Green and Blue infrastructure (GBI) strategy. This inclusion is extremely valuable both for enhancing the potential for community food provisioning in our district and for all the other benefits that community food growing spaces can bring in terms of social wellbeing, biodiversity, air quality, water management and climate resilience. We hope that the GBI strategy will translate to the protection and creation of green and blue spaces (including food growing spaces) in existing and new developments as suggested by the addition of this phrase to the Strategic Land Allocations DPD: “protect, maintain, enhance and extend the District’s green and blue spaces, corridors and chains that make up the wider network, and their multifunctional value, integrity and connectivity to ensure the network is as resilient as possible to the impacts of climate change.” In our response to the initial consultation in 2020 we proposed that: “Planning processes should prioritise food growing spaces within new developments with planning consent for new housing developments to include a requirement for productive land such as community gardens, allotments & orchards to be included in developments, as well as spaces for community composting” | Comments and support noted. | No | No |
| 88 | _009/8 | Dr Rachel Marshall | on behalf of Food Futures Partnership | Land Allocation DPD and Part Two Development Management DPD | 9 | DM29 | 9.5 | General comment | We welcome the additions made in the Dev Management DPD in particular POLICY DM29: KEY DESIGN PRINCIPLES which now includes the following addition within the design of new development. : “ Deliver net gains in green and blue infrastructure, and retaining and enhancing, where possible, appropriate amounts of garden / outdoor space for occupiers of both proposed and neighbouring uses, as well as providing opportunities for food growing space and the incorporation of space for onsite composting” [Development management DPD Section 9 pg. 65]. In designing these spaces developers could benefit from liaising with local projects- for instance the FoodFutures ‘Where the Wildings Are?’ project is working with seven local schools to develop designs for food growing in different types of shared space. Learnings from this project will be shared and templates for communal food growing designs adapted for different spaces will be made available as the project progresses. There is also a wealth of knowledge within the local community on the design and development of food growing spaces that are adapted to our local conditions. It would be valuable to ensure that any spaces developers design are done so in ways that draw on this local knowledge. We know that SPDs are being prepared that will deliver more detail on elements on urban growing and communal composting and we look forward to responding to consultations on these. We also query the use of the term ‘where possible’ in the phrase above and would ask that the plan puts in place clear guidelines as to how that phrase is interpreted to ensure inclusion of personal and community food growing space becomes the norm. Community food growing spaces should also not just become token efforts as part of developments but instead designed to deliver multifunctional benefits. We would like to see different sizes of food growing spaces available depending on the access communities have to open and food growing | Comments noted. ‘Where possible’ has been removed as part of Regulation 18 draft in relation to paragraph XIV. of DM29. The emerging SPD “Acknowledging the Emergency: Developments built for community, climate, and environmental resilience” will include greater detail as to how the spaces for food growing should be considered. Recognition of LCC signing the Glasgow Food & Climate Declaration in November 2021 has also been included into DM29 supporting text. | No | No |

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| | | | | | | | | | spaces. This may mean that substantial quantities of land around and in developments are offered to communities as part of their green and blue infrastructure, of which food growing is a part. | | | |
| 89 | _009/9 | Dr Rachel Marshall | on behalf of Food Futures Partnership | GBI | - | - | - | Support/General comment | We also welcome and appreciate the work that has gone into developing the GBI strategy and ensuring greater protection for open spaces around our district that offer benefits for people, animals and give us greater resilience going forwards. In our initial response in 2020 we asked that: "Protection should also be granted for green spaces as these are the lungs of the city and are of great importance for biodiversity, physical & mental health." It is positive to see that the GBI strategy is actively mapping out and planning forward how to protect, connect and create more green and blue spaces that deliver benefits on many levels. We are pleased to see that food growing spaces are recognised as valuable greenspace within our district and that the strategy aims to take approaches that will connect and support communities developing projects to increase access to food growing space in the district. Community engagement and connectivity will be key here to ensure that people benefit from new green spaces and that these places are loved and maintained. We restate that small-scale, agroecological food growing can bring additional benefits to existing GBI with research showing that food growing brings additional and complementary ecosystem services to our urban greenspaces. Agroecological production can also enhance the ecosystem benefits of traditional agricultural land and we have excellent examples of this already in the district. For example, Claver Hill which over the space of 7 years has transformed from 35 acres of improved pasture (which delivers a relatively small number of ecosystem services) to a diverse set of habitats and cultivated land producing fruit, veg and salad. Habitats being created on site include meadow, mixed deciduous woodland, reed beds, ponds, edible and non-edible hedgerows. The site also hosts pollinator patches and a diverse set of landbased production including community food projects, a coppice woodland, a flower farm, a tree nursery and a natural dyes growing project. A natural flood management approach has been trialled on the site which both slows the flow of water into Newton Beck and removes contamination from the beck through a reed bed system. This space will eventually be surrounded by new development as planned in the East Lancaster development area but it will provide a fantastic range of ecosystem benefits in terms of biodiversity, water management, access to green space and food production in what will become a highly developed area. We urge the planning team to identify more large plots around the district particularly near to planned new development that can provide the multi-functional community and environmental benefits that Claver Hill does. | Support and comments noted. The emerging SPD "Acknowledging the Emergency: Developments built for community, climate, and environmental resilience" will include greater detail as to how the spaces for food growing and local food enterprises can be included in new residential and commercial development. The importance of local food growing and food chains part of the forthcoming AAP for South Lancaster. However, land allocations are outside of scope of the CELPR. Comments relating to council corporate priorities noted however out of scope of the CELPR. | No | No |
| 90 | _009/10 | Dr Rachel Marshall | on behalf of Food Futures Partnership | Land Allocation DPD and Part Two Development Management DPD | 9 | DM30a | 9.16 | General comment | There have also been a wide range of additions and modifications to the sustainable construction and design elements within the Dev Management DPD [POLICY DM30a: SUSTAINABLE DESIGN pg. 70] which look positive. Within the partnership we have specialists on sustainable building construction who have provided feedback on a number of the policies related to sustainable design. | Support noted. No action required. | No | No |
| 91 | _009/11 | Dr Rachel Marshall | on behalf of Food Futures Partnership | Part One Strategic Policies and Land Allocation DPD and Part Two Development Management DPD | 6 | CC1 | 6.5 | General comment | Response to consultation questions Doc 1: Strategic Policies and Land Allocations DPD- commenting on key parts that are of relevance to FoodFutures strategy Part One DPD: Policy CC1. Responding to Climate Change and Creating Environmental Sustainability [pg. 27] Supporting Comment We are pleased to see that the local plan incorporates ambitions for becoming a low carbon, water sensitive district with a thriving economy. We're pleased to see that new developments will be required to minimise emissions and maximise use of renewable energy and resources as well as incorporating in measures to provide climate change adaptation and resilience. As with all things it is the detail which is going to be important and also the degree to which developers are legally required to take action rather than just 'having to take opportunities'. We feel that phrases such as 'take opportunity' and 'where possible' weaken the ambition of the plan. What is the obligation on developers to ensure they integrate principals of sustainable design and construction when these phrases are used? We would like to see the local plan putting an obligation on developers to deliver developments fit for a climate emergency and follow the highest environmental, and energy and resource efficiency standards. Biodiversity net gain must relate to real benefits within the district itself and must ensure that connectivity is maintained. We would like to see the council invest resources so that we have independent evidence and advice on the climate, social and environmental impacts on all future development and before any planning decisions are made. In the light of the climate emergency and these proposed revisions to the local plan we would like to see a commitment to all decision making on planning and infrastructure investment being informed by evidence, independent climate impact assessment and community engagement. | Support and comments noted. 'Should take opportunities' replaced with "will" in Policy CC1. Comments on corporate policies have been noted. | Yes | No |
| 92 | _009/12 | Dr Rachel Marshall | on behalf of Food Futures Partnership | Part One Strategic Policies and Land Allocation DPD and Part Two Development Management DPD | 8 | SP4 | 8.8 | General comment | Policy SP4: Priorities for Sustainable Economic Prosperity [pg. 38] General Comment The change from the use of 'economic growth' to 'economic prosperity' in policy SP4 is welcomed. It reflects evidence that economic growth (measured typically by GDP) does not necessarily bring about increases in prosperity and wellbeing which is what we want our local communities to experience. It is becoming increasingly clear that economic growth cannot be easily decoupled from carbon emissions and resource use- and therefore switching to the idea of prosperity offers more realistic opportunity for reducing carbon emissions and destructive resource use. However, it will be interesting to see a more developed approach to how economic prosperity will be assessed and it would be valuable for this to be both an evidence rich approach but also one that is co-developed with the local community. We would like to see the council to share a strategy for incorporating in discussions from community conversations completed over the past 18 months to shape any concepts of economic prosperity that emerge and for there to be a clear strategy for community engagement on these and other issues going forwards. Priorities for economic prosperity should not just focus on the 'high growth' sectors of today but think forwards to what aspects would bring about greater economic prosperity for communities in the future. Along with the more typical industry and tech based growth areas mentioned in the plan, we also need to see a focus on land-based skills and micro/small local enterprise. We're concerned that the food sector is not mentioned given the increasing evidence to demonstrate we need to localise food supply chains- and the potential benefits this can have for economic prosperity and wellbeing. Recognising the value of micro and small enterprise, local food enterprise and the land-based sector will enable greater focus on the infrastructures required to grow these areas- and provide localised and diverse jobs for our communities. This includes access to land for food production, access to buildings and educational facilities. For instance, infrastructure within the district could be leveraged to support the development of initiatives, such as food hubs, which can deliver multiple economic, social and environmental benefits. This includes the potential to support more climate friendly food procurement whilst also providing opportunities for green jobs creation, community action, cohesion and tackling food poverty. The points above also relate to the more detailed areas of the plan that discuss different parts of the district for instance the Lancaster City Centre strategy. We need to be proactive in encouraging and supporting smaller and more diverse enterprises, giving this sector a fighting chance in an economic market that favours the large and global. | Support and comments noted. Local food supply chains have been added to SP4. Corporate strategy is outside of the scope of this review. | Yes | No |
| 93 | _009/13 | Dr Rachel Marshall | on behalf of Food | Part One Strategic Policies and | 10 | SP8 | 10.4 | General comment | Policy SP8: Protecting the Natural Environment [Pg. 51] Supporting comment We are pleased to see the following addition to Policy SP8 'Development must protect, maintain, enhance and extend the District's green and blue spaces, corridors and chains that make up the wider network, and their multifunctional value, | Comments noted. Text added to include community engagement. | Yes | No |

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| | | | Futures Partnership | Land Allocation DPD and Part Two Development Management DPD | | | | | integrity and connectivity to ensure the network is as resilient as possible to the impacts of climate change.’ When read alongside the GBI strategy it is positive to see that a holistic, connected and multifunctional approach is being taken to green and blue spaces in our district. We value the mapping that has taken place of the district's GBI. It is good to see a commitment to maintaining and extending GBI in future new developments and also through connecting up existing spaces and creating new spaces for recreation, food growing and nature throughout the district. The GBI strategy has recognised the importance of engaging with communities around how spaces are created, protected or maintained and we would like to see this community engagement as a key process in future decision making. This means leaving enough time for communities to engage, ensuring the process is accessible to all and using different methods that enable a diverse sector of society to engage. | | | |
| 94 | _009/14 | Dr Rachel Marshall | on behalf of Food Futures Partnership | Part One Strategic Policies and Land Allocation DPD and Part Two Development Management DPD | 11 | SP9 | 11.1 | General comment | Policy SP9: Maintaining Strong and Vibrant Communities [pg. 54] General Comment We’re pleased to see the addition of the stipulation that new developments must be resilient to climate change and developers will be responsible for ensuring this. We strongly agree with the statement that ‘the opportunities to build such resilience should not be simply a gesture in the process’ and we would like to see greater detail on how this will be achieved. Section 11.6 also highlights an important aspect which is relevant to climate resilience.: “The Council recognises that there are many existing facilities serving the districts communities, such as public houses, churches, village halls, GP Practices, healthcare clinics, community gardens, community centres and local shops. The Local Plan will seek to protect such facilities from loss particularly where it is demonstrated that they retain community value.” These community spaces are critical spaces for community cohesion and resilience, which will be a crucial part in ensuring the emergence of a more fair and sustainable economy. We stress that the local plan should prioritise the protection of these spaces, and other publicly owned assets in the urban area and actively facilitate greater access for community projects, groups and social enterprises to use these spaces. Communal cooking and eating can also be a really good way of ensuring healthy diets, reducing social isolation and also making use of surplus food that may have gone to waste. As FoodFutures we have identified a lack of community kitchens and other facilities suitable for cooking and eating together across the district so this should be something that planners can actively seek to plan and provide for. In addition to improving physical and mental health and reducing food waste, such facilities could be used for food-based education and training as part of a healthy living programme and also as a business incubator for small healthy food producers wanting to start a business (for example in preserves or fermented foods). - We’d like to see policies that enable local communities to access land and spaces around the district for food growing and community hubs through increasing access to data on land ownership and providing financial and legal support for community asset purchase. - We would like to see a policy that protects against any further selling of public assets in the district for short-term financial benefit, instead looking at how these assets can be used to support community wealth building and enterprise. - We would like to see food growing spaces (such as community gardens, allotments & orchards) within new developments prioritised as community infrastructure (along with schools and healthcare) as food is as essential to community wellbeing and sustainability as health and education. | Support and comments noted. A prioritization of protection of different community spaces is outside of the scope of this review however could potentially be included as part of a full plan review. Community spaces added to SP9. DM43 has new text as part of the Reg 18 consultation draft which specifically addresses the loss of green spaces. Comments relating to corporate policy and selling of public assets has been noted. Prioritization of food growing spaces as community spaces is outside of the scope of this review however the importance of their inclusion in all new development has been included. | Yes | No |
| 95 | _009/15 | Dr Rachel Marshall | on behalf of Food Futures Partnership | Part One Strategic Policies and Land Allocation DPD and Part Two Development Management DPD | 13 | SG4 | 13.2 | General comment | Policy SG 4: Lancaster City Centre (PG 70) General comment The council is preparing a city centre strategy which looks to improve its role as an economic, cultural and visitor centre within the wider region. We’re pleased to see that GBI is now included within the assets that the city centre has and that the strategy will look to improve the environmental status of the city rather than just its economic status. We will look to respond to any consultation that emerges around the city centre strategy but at this stage we would stress the importance of promoting local agroecological food supply chains (linking up the growth of the food and drink offer in the city centre (as in point 13.9) with local, climate and nature friendly producers) in reducing the climate impact of food and drink choices of local residents and visitors. As discussed previously we’d like to see more protection of public owned assets and retail space in the city centre, and more access given to communities and micro-enterprises to use vacant spaces in the retail area. | Support and comments noted. Corporate policies around protection of public owned assets outside of the scope of the CELPR however have been noted. Policy SG4 amended to include emphasis on local food supply chains and local food systems. | Yes | No |
| 96 | _009/16 | Dr Rachel Marshall | on behalf of Food Futures Partnership | Part One Strategic Policies and Land Allocation DPD and Part Two Development Management DPD | 23 | SC4 | 23.16 | General comment | Policy SC4: Green and Blue Corridors and Chains [pg. 181] Supporting comment We’re pleased to see the inclusion of more defined policies around green and blue corridors and chains, including defining areas for protection, a toolkit for assessing the multifunctionality of these spaces and obligation on developers to contribute and improve these spaces. A lot of work has clearly gone into developing the GBI strategy and this will be crucial for ensuring that new developments really deliver on improving GBI. The GBI strategy feels like a really positive and future thinking project and document. It is valuable that our green and blue spaces have been mapped out in detail and there is now strategic thinking about designing new spaces in and connecting up those existing. The focus on multi-functionality and connectivity - and the aspirations for community engagement as key to the process- is very positive. We recommend that the council works closely with existing community partnerships and projects to really leverage the networks and connections that already exist across our district. | Support and comments noted. No action for CELPR required. | No | No |
| 97 | _009/17 | Dr Rachel Marshall | on behalf of Food Futures Partnership | Part One Strategic Policies and Land Allocation DPD and Part Two Development Management DPD | 23 | SC5 | 23.19 | General comment | Policy SC 5: Recreation Opportunity Areas Supporting comment We welcome the addition that: “recreational areas fulfilled in accordance with the requirements set out in policy DM43 (Green and Blue Infrastructure), as consideration should also be given to the additional green and blue infrastructure uses and benefits that these opportunity areas could provide, given the multifunctional nature of green and blue spaces.” Designing spaces to deliver multifunctional benefits and drawing on community consultation will be crucial in ensuring that these spaces are valued by communities and provide multiple benefits and climate resilience. | Support and comments noted. No action required. | No | No |
| 98 | _009/18 | Dr Rachel Marshall | on behalf of Food Futures Partnership | Part Two Development Management DPD | 7 | DM27 | 7.20 | General comment | Policy DM27. Open space, sports and recreation [pg. 59] Supporting comment We’re pleased to note the addition of a requirement for an environmental, climate mitigation and climate adaptation value of open space, sports and recreation. We would ask that there are clear guidelines as to how that assessment is taken out that draw on both research evidence and community consultation. It is valuable that a Toolkit is being designed within the GBI strategy but it is crucial that any Toolkits are used holistically and do not enable developers to go through the motions of assessing environmental and social value. | Comments noted and strengthening text added to DM27 paragraph II. | Yes | No |
| 99 | _009/19 | Dr Rachel Marshall | on behalf of Food Futures Partnership | Part Two Development Management DPD | 9 | DM29 | 9.5 | Support | Policy DM29. Key Design Principals [pg. 64] Supporting comment We’re pleased to that developers will now have to include green and blue infrastructure as integral parts of development designs- and that food growing and onsite composting is part of this. Whilst we acknowledge the benefits that private gardens have it is important to highlight the different benefits that additional shared growing spaces can have in delivering benefits as places for social cohesion, skill sharing and opportunities for all to benefit from the potential for | Support and comments noted. The proposed changes to DM29 related to food growing spaces at the sites of new development will be supported through a new SPD which will provide the guidance to how these food spaces should be shaped. | No | No |

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| | | | | | | | | | urban grown fresh food. As further guidance is created for developers (in the form of SPD and PANs) we would recommend that communal food growing spaces form an integral part of this. | | | |
| 100 | _009/20 | Dr Rachel Marshall | on behalf of Food Futures Partnership | Part Two Development Management DPD | 9 | DM30b | 9.16 | support | Policy DM30b. Sustainable design and construction-Water Efficiency [pg. 77] Supporting Would also recommend inclusion of low flow taps and showers, low flush toilets, rain gardens | Comments noted. The policy has been amended to include the suggested changes. | Yes | No |
| 101 | _009/21 | Dr Rachel Marshall | on behalf of Food Futures Partnership | Part Two Development Management DPD | 9. | DM30c | 9.44 | General comment | Policy DM30c. Sustainable design and construction- Materials and waste [pg. 78] Supporting Would also recommend: - that materials should not be used that would use high energy for demolition and recycling after use or that might release toxic materials to the environment - Local materials - Life cycle analyses of materials essential - Encourage repairable materials - Long life materials - Non toxic materials avoiding toxicity in the buildings through release of dusts or solvents. | Comments noted. Applicable changes have been included in DM30c and additional paragraph to be inserted in supporting text after existing paragraph 9.46. | Yes | No |
| 102 | _009/22 | Dr Rachel Marshall | on behalf of Food Futures Partnership | Part Two Development Management DPD | 9 | DM33 | 9.19 | General Comment | Policy DM33. Development and flood risk [pg. 83] General comment -In general there is no mention of how these issues might relate to rural areas - eg: how the flooding problem is largely one of run off from upland areas and how landowner could be making a positive contribution by the way they manage their land. Is there potential for stipulating that developers contribute to management of land upstream to mitigate flooding? -Play and recreation areas and gardens are key areas where infiltration needs to be encouraged. Good soil biology in these areas will greatly help infiltration. These areas can often be used safely as attenuation areas at peak flood conditions. | The policy relates equally to all areas at flood risk where development may take place. Upstream management would not be directly related to impacts of development therefore unlikely to pass the tests for contributions. Play areas, recreation and peak flows are addressed within policies DM33 and DM34. | No | No |
| 103 | _009/23 | Dr Rachel Marshall | on behalf of Food Futures Partnership | Part Two Development Management DPD | 9 | DM34 | 9.30 | General comment | Policy DM34: Surface Water Run-off and Sustainable Drainage [pg. 87] Supporting Would also recommend - enabling infiltration to recharge the groundwater in car parks, roadways and rain gardens. - create strategy of slow spread and sink rainwater | Comments have been noted and applicable changes have been included into DM34. | Yes | No |
| 104 | _009/24 | Dr Rachel Marshall | on behalf of Food Futures Partnership | Part Two Development Management DPD | 11 | DM43 | 11.2 | General comment | Policy DM43: Green and Blue Infrastructure [pg. 111] Supporting comment We welcome the additions made to this policy which now provide a much greater recognition and protection of GBI within planning policy. We are really pleased that the proposed revisions prioritise connectivity and multifunctionality as these are crucial aspects in supporting ecosystems (and our communities within them) in being more resilient to climate challenges. It is so crucial in planning that we are able to look at our place through a whole-systems lens and ensure that we have a vision for nature, biodiversity and community resilience that we look to protect and grow. Policy DM43 and the GBI strategy feels like a very positive step in this direction. It is also good to see the inclusion of management plans and strategies to ensure that where new GBI is created, the benefits are retained in the long term. Whilst some private management of infrastructure is valuable and essential to ensure developers take responsibility for good design we would also suggest that some spaces should be designed so as to require low maintenance or that resource is also invested into local communities to learn the skills and be empowered to also care for green and blue spaces. This should not be an opportunity for developers to pass responsibility to communities, but it would be really valuable to create community spaces that everyone felt responsible for and empowered to care for. This is an aspect which comes up in the GBI strategy around community engagement and skills. It would be valuable to create pathways by which developers invest in local community skills (for example by funding local community groups, conservation groups etc) thus leveraging further benefit and economic resource from new developments. Local food growing and allotments are specifically mentioned within this section. As highlighted in the SPD there is a deficiency in supply of allotments and community food growing spaces already within Lancaster District. It is welcomed that this deficiency will be somewhat addressed through new development but it would also be valuable to identify sites within the existing urban spaces where growing spaces could be incorporated. This may mean looking how food growing could be incorporated into existing green spaces in ways that do not negatively affect the other benefits offered by those spaces. Research shows that incorporating food growing into green spaces increases the ecosystem service delivery. Community engagement will be key for designing food into green spaces (such as parks, grassy spaces in existing settlements) as these areas would need to be owned and cared for by the community. Local organisations that are part of FoodFutures, such as LESS and Claver Hill, have years of experience of community engagement around community food growing projects and spaces. It will be valuable to draw on this and other local (and national) experience. It would be great to see planning policies that actively encourage (or at least do not restrict) the incorporation of food growing into existing green and open space, whilst recognising that there is a need to retain the ecosystem and societal benefits these spaces have. Spaces can be designed so as to deliver multifunctional benefits including food production and much can be learnt from permaculture design, including from local permaculture designers in the district. As mentioned in our overarching summary comment at FoodFutures we are embarking on a collaborative project ('Where the Wildings Are?') with the Morecambe Bay Curriculum Schools group. We're working with seven local schools to develop designs for food growing in different types of shared space. Learnings from this project will be shared and templates for communal food growing designs adapted for different spaces made available as the project progresses. There are also other spaces around our urban areas where it would be valuable to encourage and enable local communities to develop food growing and re-wilded areas. These might be disused car parks, vacant lots or alleyways. Even areas dominated by concrete can be transformed through careful design. If you'd like to know more about the visions for food production that emerged from the FoodFutures strategy process please see the vision document here: https://foodfutures.org.uk/food-strategy/ | Support and comments noted. Many of the suggestions are outside of the scope of the CELPR and current Section 106 rules, however can be considered as part of the full plan review, Lancaster South AAP and forthcoming "Acknowledging the Emergency: Developments built for community, climate, and environmental resilience" SPD. Land use studies and use of underutilized land is outside of the scope of the CELPR. Food growing spaces has been addressed in DM29 and the GBI strategy and concepts arising from permaculture design are include in the forthcoming "Acknowledging the Emergency: Developments built for community, climate, and environmental resilience" SPD. Comments applicable to corporate policy noted. | No | No |
| 105 | _009/25 | Dr Rachel Marshall | on behalf of Food Futures Partnership | Part Two Development Management DPD | 11 | DM45 | 11.34 | General comment | Policy DM45: Protection of trees, hedgerows and woodland [pg. 120] Supporting comment It is valuable to have the inclusion of 'climate mitigation and adaptation' as part of the assessment of the value of trees, hedgerows and woodland. We hope that this will lead to greater protection to our tree and woodland areas. Whilst tree planting is being seen as one approach for meeting Net Zero targets, it is also essential that we maintain the woodlands and trees we already have. This is particularly important as tree survival rate is declining and an increasing number of tree species are threatened with extinction from a range of threats including climate change. In particular we are on the trajectory of losing around 90% of our ash trees- a species that makes up around 30% of UK tree cover. We feel that strong policies to protect our trees and woodlands is crucial at this stage. | Comments noted. | No | No |
| 106 | _009/26 | Dr Rachel Marshall | on behalf of Food Futures Partnership | Part Two Development Management DPD | 16 | DM62 | 16.21 | General Comment | DM62 Electric Vehicle Charging Points General comment We would recommend this addition The new development needs to provide renewable energy that can provide the majority of energy to run these cars | Comments noted. Policy text included to highlight inclusion of onsite renewable electricity provision for EV charging. | Yes | No |

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| | | | | Management DPD | | | | | | | | |
| 107 | _010/1 | Peter Dutton | Gladmans | Part One Strategic Policies and Land Allocation DPD and Part Two Development Management DPD | Sustainability Appraisal | - | - | General Comment | Notes that a full Sustainability Appraisal (SA) of the proposed amendments is not yet available. Gladman look forward to seeing this alongside the Regulation 19 consultation including further detail on how the Council's policy choices have evolved through an objective and iterative process including the consideration of alternatives. | The supporting topic papers detail the SA work that was undertaken to support the regulation 18 consultation. This included a consideration of alternative options and an assessment of the proposed amendments. This work informed the document which was consulted on. A full SA report will be prepared to accompany the Regulation 19 consultation. | No | No |
| 108 | _010/2 | Peter Dutton | Gladman | Part One Strategic Policies and Land Allocation DPD | 6 | CC1 | 6.5 | General Comment | Note that the ability to implement climate change mitigation and adaptation measures may vary depending on site circumstances and as such consider that it would be more appropriate for Policy CC1 to acknowledge that development proposals should 'maximise' the opportunities that are available to them on an individual basis. | Comments noted. The policy is considered to provide this flexibility and recognises that the opportunities available will vary across sites. No action required. | No | No |
| 109 | _010/3 | Peter Dutton | Gladman | Part One Strategic Policies and Land Allocation DPD | 6 | CC1 | 6.5 | General Comment | Question whether the final paragraph of Policy CL1 is required given that Policy SP1 recognises that the Development Plan must be read as a whole and that proposals must accord with policies in the Local Plan. | Assume consultee is referring to policy CC1. The council considers that the proposed wording of CC1 is appropriate however final para of CC1 has been removed. | Yes | No |
| 110 | _010/4 | Peter Dutton | Gladman | Part One Strategic Policies and Land Allocation DPD | 8 | SP4 | 8.8 | General Comment | Welcome the Council's aspirations to develop an appropriate skills base to accompany the ambitious building standards and targets. They note that the lack of a sufficiently skilled workforce could act as a potential constraint impacting on the ability to deliver the higher standards proposed. | Comments noted. No action required. | No | No |
| 111 | _010/5 | Peter Dutton | Gladman | Part One Strategic Policies and Land Allocation DPD | 10 | SP8 | 10.4 | General comment | Note that their proposals at Bailrigg Lane would support the aspirations of this policy by purposefully ensuring that any development is set within a high-quality framework or retained and enhanced blue and green infrastructure. | Comments noted. No action required. | No | No |
| 112 | _010/6 | Peter Dutton | Gladman | Part One Strategic Policies and Land Allocation DPD | 11 | SP9 | 11.1 | General Comment | Note that the policy would benefit from removing the current focus on the delivery of low carbon and energy efficient housing noting that a developments ability to mitigate and adapt to climate change is broader than this one specific issue. | Comments noted. LCC consider that reading the CELPR as a whole does ensure that climate change adaption and mitigation isn't purely focused on low carbon and energy efficient homes. SP9 specifically talks about not just low carbon and energy efficient homes but also community and commercial spaces and 'new development' which isn't specific to housing. | No | No |
| 113 | _010/7 | Peter Dutton | Gladman | Part One Strategic Policies and Land Allocation DPD | 11 | SP10 | 11.7 | General Comment | Note that their proposals at Bailrigg Lane would support the aspirations of this policy by incorporating a network of walking and cycling routes into the scheme design, alongside connections to the existing network of walking and cycling resources in the wider surrounding area. | Comments noted. No action required. | No | No |
| 114 | _010/8 | Peter Dutton | Gladman | Part One Strategic Policies and Land Allocation DPD | 12 | SG1 | 12.6 | General Comment | Note the updated reference in the policy from 'Bus Rapid Transit' to 'Better Buses Scheme'. Request that additional text be added to the supporting text to explain in more detail what this is. | Add 'Better Buses' to appendix A Glossary of Terms. | Yes | No |
| 115 | _010/9 | Peter Dutton | Gladman | Part One Strategic Policies and Land Allocation DPD | 23 | SC4 | 23.16 | General comment | Note that Policy SC4 identifies how new development will be expected to contribute to, and where appropriate, improve and enhance green and blue infrastructure corridors and chains. Gladman advise that their scheme at Bailrigg has the potential to enhance green and blue spaces along Burrow Beck by limiting surface water run-off into this asset to a 1 in 100 year +40% climate change event scenario compared to current, uncontrolled run-off conditions. | Comments noted. No action required. | No | No |
| 116 | _010/10 | Peter Dutton | Gladman | Part One Strategic Policies and Land Allocation DPD | 24 | T4 | 24.11 | General Comment | Note that their proposals at Bailrigg Lane supports the requirement to ensure that development proposals that generate significant levels of traffic are supported by frequent, high quality public transport linking them to the city centre. | Comments noted. No action required. | No | No |
| 117 | _010/11 | Peter Dutton | Gladman | Part Two Development Management DPD | 4 | DM3 | 4.24 | General Comment | Note that at this stage they have no comments to make in the proposed revisions to Policy DM3 but reserve the right to comment on this matter again in light of further details provided through the authority's ongoing SPD work. | Comments noted. No action required. | No | No |

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|---|---------|--------------|--------------|-------------------------------------|---------|--------|------|-----------------------------------|---|---|----------------|---------------------------------|
| 118 | _010/12 | Peter Dutton | Gladman | Part Two Development Management DPD | 9 | DM29 | 9.5 | General Comment | Whilst noting no objection to the policy Gladman highlight that the ability to comply with its aspirations may vary on a site-by-site basis, taking account of site specific circumstances or other design/site layout criteria. Suggest that it would be beneficial to amend the provisions of the policy to reflect this. | Comments noted. The policy allows for proposals to be considered on a site-by-site basis. The policy as worded allows this flexibility. No action required. | No | No |
| 119 | _010/13 | Peter Dutton | Gladman | Part Two Development Management DPD | 9 | DM30a | 9.16 | General comment | Note that whilst Gladman are supportive of the drive to implement higher building performance standards, the Council should ensure that the requirements of this policy align with the Government's roadmap for delivering zero carbon developments. | The Government have specified that LA's can set their own standards. The fabric first approach does not simply reply on decarbonation of the grid (as per the national approach) and is also a more cost-effective approach as demonstrated in the supporting VA. No action required | No | No |
| 120 | _010/14 | Peter Dutton | Gladman | Part Two Development Management DPD | 9 | DM30a | 9.16 | General Comment | Note that the policy should be clear on the potential interaction between the Council's proposed building standards for 2025 and 2028 and the proposed Future Homes Standard. Advise that the Council should ensure that its proposed approach is compatible with any specific construction methods/building standards that will be required under the Future Homes Standard and accompanying changes to the building regulations. Question whether there will be an on-going requirement to set locally specific targets that may replicate the Building Regulations regime. | Government allows LPAs to go beyond the national standards. LCC evidence supports standards proposed in CELPR and will assist in reaching climate emergency net carbon zero by 2030. No action required. In its response to the comments received in respect of the Future Homes Standard Consultation, the Government states at paragraph 2.39, 'Local authorities have a unique combination of powers, assets, access to funding, local knowledge, relationships with key stakeholders and democratic accountability. This enables them to drive local progress towards our national climate change commitments in a way that maximises the benefits to the communities they serve.' The Government clarifies at paragraph 2.40 that local planning authorities will retain powers to set local energy efficiency standards for new homes. The PPG (paragraph: 003 Reference ID: 6-003-20140612) provides examples of how local plans can address climate change. These include promoting low carbon design approaches to reduce energy consultant. Paragraph 154 of the NPPF states, 'New development should be planned for in ways that: b) can help reduce greenhouse gas emission, such as through its design.' The requirements of policy DM30a accord with the PPG and the NPPF. | No | No |
| 121 | _010/15 | Peter Dutton | Gladman | Viability Assessment | - | - | - | General Comment | See Viability Assessment Responses at the end of this table. | See Viability Assessment Responses at the end of this table. | No | No |
| 122 | _010/16 | Peter Dutton | Gladman | Part Two Development Management DPD | 9 | DM30a | 9.16 | General Comment | Whilst welcoming the use of the energy hierarchy Gladman request that the potential effects of combined standards have been assessed. They note an example of the combined cost of meeting the Future Homes Standard via Building regulations and the cost of meeting the Council's 2028 net zero carbon emissions. | Meeting the 2028 zero carbon requirement is expected to meet the Future Homes requirement and will not be in addition to it. | No | No |
| 123 | _010/17 | Peter Dutton | Gladman | Part Two Development Management DPD | 9 | DM30a | 9.16 | General Comment | Note that the Policy identifies how the Council will require proposals to include opportunities for low carbon energy and renewable technologies, or other sustainable measures to be integrated into the build. In reviewing the supporting text they assume that this refers to the ability to offer additional low carbon technologies or other sustainability measures to home purchasers as 'add-ons' rather than an additional requirement to include these measures as standard. | The policy aims to ensure that opportunities are provided for the incorporation of technologies where future purchasers wish to install. This could either be during the initial build or at a future point in time following the completion of the building. No action required. | No | No |
| 124 | _010/18 | Peter Dutton | Gladman | Part Two Development Management DPD | 9 | DM30b | 9.16 | General Comment | Note that the Planning Practice Guide on housing optional technical standards advises that the optional standards can be used subject to a number of criteria being met. Gladman advise that the Council should ensure that all the criteria have been met when seeking to optional water efficiency standards. | The Council are satisfied that the required standards have been met. No action required. Adoption of the standards are supported by United Utilities and by the Water Efficiency in New Homes paper prepared by Water Resources West in accordance with the criteria in the PPG. | No | No |
| 125 | _10/19 | Peter Dutton | Gladman | Part Two Development Management DPD | 9 | DM30c | 9.44 | Support | Welcome the flexibility that has been included in the wording of this policy. | Support noted. | No | No |
| 126 | _10/20 | Peter Dutton | Gladman | Part Two Development Management DPD | 9 | DM33 | 9.19 | General Comment | Note that the authority should ensure that its proposed revisions are consistent with national planning policy and guidance on flood risk, and compatible with any separate requirements of the LLFA. | Comments noted. The policy is consistent with national policy and guidance and has been prepared in discussion with the LLFA. No action required. | No | No |
| 127 | _10/21 | Peter Dutton | Gladman | Part Two Development Management DPD | 9 | DM34 | 9.30 | General Comment | Note that the authority should ensure that its proposed revisions are consistent with all relevant guidance and any separate requirements of the LLFA. | Comments noted. The policy is consistent with national policy and guidance and has been prepared in discussion with the LLFA. No action required. | No | No |
| 128 | _10/22 | Peter Dutton | Gladman | Part Two Development Management DPD | 11 | DM43 | 11.2 | General Comment | Acknowledge the ambitions of the policy. Confirm that their proposals for Bailrigg Lane would support the aim of this policy by seeking to protect the Burrow Beck corridor and taking opportunities to enhance the availability of blue and green spaces as part of the schemes design. | Comments noted. No action required. | No | No |

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| | | | | Management DPD | | | | | | | | |
| 129 | _10/23 | Peter Dutton | Gladman | Viability Assessment | - | - | - | General Comment | See Viability Assessment Reponses at the end of this table. | See Viability Assessment Reponses at the end of this table. | No | No |
| 130 | _10/24 | Peter Dutton | Gladman | Part Two Development Management DPD | 16 | DM62 | 16.21 | General Comment | Advise that due to the evolving nature of electrical vehicles and charging requirements it may be preferable to ensure that developments and dwellings are provided with the infrastructure to enable EV charging, or the installation of a charging point in the future, rather than stipulating that a specific type of charging point or charging unit is installed at the outset. | Comments noted. The Council agree that flexibility is required to allow for future technologies and advancements. The policy as worded is considered to provide this flexibility. No action required. | No | No |
| 131 | _10/25 | Peter Dutton | Gladman | Community Infrastructure Levy | - | - | - | General Comment | Note the absence of a list of infrastructure items or projects that the Council intends to fund through CIL. Gladman advise that it would be useful to have a better understanding of the types of projects that the Council intend to fund through CIL and S106 and how this has informed the authority's proposed charging rates. | The list of potential funding streams is included within the Infrastructure Delivery Schedule. | No | No |
| 132 | _10/26 | Peter Dutton | Gladman | Community Infrastructure Levy | - | - | - | General Comment | Note that the Draft Charging Zone Map identifies that a CIL charge of £100 would apply in the South Lancaster area. Assume that this will be subject to change pending the outcome of any viability work that is undertaken for the South Lancaster Broad Location for Growth. Gladman query whether it is the case that developments in the South Lancaster area will have their own specific infrastructure requirements, which may go beyond standard S106 assumptions. Advise that the Council should ensure that this has been reflected in the authority's approach to the Local Plan Review and testing of its policy proposals. | If progressed the CIL rate would be an interim one until the AAP has progressed and a bespoke Viability Assessment has been carried out. The comments will be given due consideration as the City Council considers the scope and role of CIL within the district. | No | No |
| 133 | _011/01 | Richard Thomas | H20 Urban | Part One Strategic Policies and Land Allocation DPD | - | - | - | Object | Consider that the Plan fails to fully address the fundamental objectives of the climate emergency review taking a very narrow approach to the subject. Note that it is disappointing that the review has not been expanded to ensure that it addresses fully the issues of climate change and the climate emergency declaration by the Council. On this basis the consultee believes that the review fails to meet the tests of soundness. Advise that all relevant aspects should be reviewed. Whilst this may not result in everything changing the consultee notes that there must be evidence of review. Believes that a more comprehensive review is required and that it is not enough to detach a few specific policies from the overall objectives of the Local Plan and the sustainability focus to growth and development which underpins the document. Note that it is evident that issues such as housing delivery are directly linked to climate change matters and as such it is not reasonable to detach these policies from the review. Note that any review which is stated to be based on climate change cannot reasonably be considered comprehensive or fit for purpose unless the issue of housing delivery is properly included. To add greater urgency to the issue the consultee highlights the ongoing under provision of homes in the district in relation to the identified housing requirement for the area. Advises that the failure in delivery is a serious issue and one which fundamentally undermines the sustainability objectives of the plan. | Comments noted. The Council believe that this is not the case and that the Plan as revised represents a stepped change in planning across the district seeking to go beyond national regulations to ensure that the district plays its part in mitigating and adapting to the effects of climate change. The Plan has been amended in numerous places to ensure that this is delivered. The full scope of the review and the policies to be reviewed were determined as part of the earlier consultation work undertaken by the Council (between September and November 2020). This was done in dialogue with the community and other stakeholders with this setting the remit for the Regulation 18 consultation. The Council believes that the CELPR documents meet the test of soundness. | No | No |
| 134 | _011/02 | Richard Thomas | H20 Urban | Sustainability Appraisal | - | - | - | Object | Comments on the absence of a sustainability appraisal. | The supporting topic papers detail the SA work that was undertaken to support the regulation 18 consultation. This included a consideration of alternative options and an assessment of the proposed amendments. This work informed the document which was consulted on. A full SA report will be prepared to accompany the Regulation 19 consultation. | No | No |
| 135 | _011/03 | Richard Thomas | H20 Urban | Part One Strategic Policies and Land Allocation DPD | - | - | - | Object | The consultee comments on the absence of an assessment regarding the potential implications that the proposed new policies would have on the current site allocations in terms of viability and the scale and scope of development which would be achieved on them or whether it would be possible to address climate change via an alternative strategy. They believe that the changes proposed to matters such as the carbon footprint of new homes and the impact of this on site allocations which are already failing to deliver the housing needed should be fully understood. Failure to undertake this exercise is considered to leave the potential that the policy changes proposed could significantly constrain housing delivery in the area, which itself will prevent the overall objective of sustainable development which is noted to remain a fundamental plank of the planning system. | The CELPRVA considers the impact of the proposed carbon reduction policies on a range of typologies which reflect allocated sites in accordance with the NPPF and PPG. Other policies may result in revised layouts and house types but also have the flexibility to ensure that they do not adversely affect deliverability of homes. | No | No |
| 136 | _011/04 | Richard Thomas | H20 Urban | Part One Strategic Policies and Land Allocation DPD | 7 | DM27 | 7.20 | Object | Note that the plan fails to recognise the importance of open space, playing pitches and leisure opportunities for the local community. Believes that Policy DM27 fails to address how shortfalls in provision can be provided. This is considered to be a fundamental aspect of sustainable development providing facilities close to where people live but also ensuring issues of health and wellbeing are properly addressed. The plan currently is not considered to provide a route for delivery of these needs and without being able to provide specific schemes, the shortfall will not be addressed through the Council's policies. | Comments noted. Policy DM27 is supported by a substantial evidence base and recognises the importance of open space, playing pitches and recreational facilities. This evidence base together with the policy looks to ensure that existing spaces are protected and that where there are recognised deficiencies in open space, sports and recreational facility provision, there is a requirement for development to provide appropriate contributions on or off site. The Open Space Assessment and Standards Paper, and the Playing Pitch Strategy set out the latest position on provision and needs, which underpin this policy and have informed the revisions to Appendix D. Projects are also included within the IDS. Given the climate change focus of this partial review, a GBI Strategy was prepared and one of the key themes was recreation, acknowledging the importance of open spaces and playing pitches. Spatially mapping open spaces recognising that accessibility is key. The GBI Strategy has informed the review of DM27 and other related policies like DM43. | No | No |
| 137 | _012a/01 | Matthew Symons | Hollins Strategic Land | Community Infrastructure Levy | - | - | - | Object | Support the zero rate for strategic sites. BGV developments will be expected to make significant S106 contributions to infrastructure as referred to in the IDS. Specific testing should be carried out for South Lancaster as with the other strategic sites. Major development in South Lancaster should be exempt from CIL. LCC has a significant shortfall of deliverable housing land supply. The AAP process has slipped from the timetable set out in the Local Development Scheme (LDS) and there is potential for the delivery of BGV to be significantly delayed. LCC may consider that the imposition of a £100/sqm CIL rate on South Lancaster will act as a deterrent to developers considering the submission of applications. The threshold for retail is too low and hotels are unlikely to be viable with CIL. | The comments will be given due consideration as the City Council considers the scope and role of CIL within the district. | no | No |

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| 138 | _012a/02-05 | Matthew Symons | Hollins Strategic Land | Viability Assessment | - | - | - | Object | See Viability Assessment Reponses at the end of this table. | See Viability Assessment Reponses at the end of this table. | No | No |
| 139 | _012b/01 | Matthew Symons | Hollins Strategic Land | Part One Strategic Policies and Land Allocation DPD | - | - | - | General comment | Sets out how land off Ashton Road, western most portion of BGV will help to deliver the CELPR aims in relation to water management, green and blue infrastructure, heritage, transport, sustainable design, energy efficiency and renewable energy. | Comments noted. | No | No |
| 140 | _012b/02 | Matthew Symons | Hollins Strategic Land | Part One Strategic Policies and Land Allocation DPD | 9 | DM30 | 9.16 | General comment | Notes the CELPR proposes significant amendments to policy DM30. Advice is being sort from a Sustainable Design consultant so that the impact of the proposed amendments can be fully taken into account at Reg 19 stage. Also awaiting appendices to VA which were not available as part of Reg 18 consultation and relate to financial implications of DM30 requirements. | Comments noted. | No | No |
| 141 | _012c/01 | Matthew Symons | Hollins Strategic Land | GBI Strategy | - | - | - | General comment | Land off Ashton Road can aid the progression of the GBI Strategy. HSL agree that it is important to address the 6 key themes through proposals as described and shown within the BGV West masterplan proposed by HSL. | Comments noted. A GBI Strategy specifically for the AAP is going to be produced. | No | No |
| 142 | _013/01 | Joanne Harding | Home Builders Federation | Part One Strategic Policies and | 6 | CC1 | 6.5 | Support and general comment | Support for aim of policy but suggest should be a vision not a policy. | Should be regarded as golden thread running through the plan and applied to all proposals. Retain as policy. No action required. | No | No |
| 143 | _013/02 | Joanne Harding | Home Builders Federation | Part One Strategic Policies and Land Allocation DPD | 11 | SP9 | 11.1 | Support and general comment | Supports low carbon energy efficient in line with national standards & building regs. | Government allows LPAs to go beyond the national standards. LCC evidence supports standards proposed in CELPR and will assist in reaching climate emergency net carbon zero by 2030. No action required. | No | No |
| 144 | _013/03 | Joanne Harding | Home Builders Federation | Part One Strategic Policies and Land Allocation DPD | 24 | T4 | 24.11 | Object | The policy does not set out how deficiencies in the existing services will be identified or how frequent high-quality services will be defined, in order for this to be an effective policy more detail will be required. Providing additional public transport may not always be the most sustainable option. Costs associated with this requirement will need to be considered in relation to the viability of development. | Policy to be amended to allow flexibility in terms of contributions for bus services | Yes | No |
| 145 | _013/4 | Joanne Harding | Home Builders Federation | Part Two Development Management DPD | 4 | DM3 | 4.24 | General Comment | The NPPF1 states that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership. The Council will need to consider how this will work with their proposed split in the Morecambe, Heysham and Overton areas where the affordable housing target is 15% and the proposed tenure split would see only 40-50% of this as affordable homes for sale. If the Council does not intend to meet the 10% affordable home ownership requirement, then this will need to be evidenced. The PPG states that First Homes are the Government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations. This should be covered by the 40-50% affordable homes for sale tenure split. | Comments noted. The tenure split between affordable/social rented and affordable sale homes is not within the scope of the review. | No | No |
| 146 | _013/5 | Joanne Harding | Home Builders Federation | Part Two Development Management DPD | 9 | DM29 | 9.2 | Support | The HBF is generally supportive of the Council looking to support opportunities to maximise solar gain and thermal energy generation. However, the Council will need to ensure that these measures are balanced with other considerations such as site density, site layout, topography, heat resilience, site viability and deliverability. | Comments noted. | No | No |
| 147 | _013/6 | Joanne Harding | Home Builders Federation | Part Two Development Management DPD | 9 | DM29 | 9.2 | General comment | The HBF does not consider that it is necessary for part VII to refer to the need to meet the requirements of Policy DM30c, it is assumed the Plan is to be read as a whole. | Information is included for the purposes of clarity. | No | No |
| 148 | _013/7 | Joanne Harding | Home Builders Federation | Part Two Development Management DPD | 9 | DM29 | 9.5 | General comment | In relation to the green and blue infrastructure the HBF considers that the Council may want to reconsider the amendment to the justification text in paragraph 9.5 which changes the levels of provision to an expectation, the HBF is concerned that this inflexibility may not be appropriate when the Council are looking to ensure effective use of land and to promote active travel. The HBF consider that this amendment is not necessary. The HBF is also not clear what a development may need to provide in order to demonstrate that they have provided opportunities for food growing space or onsite composting, presumably the provision of a garden or outdoor space would offer these opportunities for any resident who wished to take them. | Exception rather than encourage has been included to make explicit that the Council will require the levels of provision which are set out in the adopted local plan in order to ensure that the policy is doing all it can to tackle the climate emergency. Details would be considered on a site-by-site basis, and consideration of whether a scheme has met the requirements would be determined as part of the overall development proposals. | No | No |
| 149 | _013/8 | Joanne Harding | Home Builders Federation | Part Two Development Management DPD | 9 | DM30a | 9.16 | Objection, general comment | The HBF considers that the Councils should comply with the Government's intention of setting standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Council's specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The Councils should not need to set local energy efficiency standards to achieve the shared net zero goal because of the higher levels of energy efficiency standards for new homes proposed in the 2021 Part L uplift and the Future Homes Standard 2025. The HBF considers that this policy should be deleted and left for building regulations, avoiding the same set of requirements being considered twice, and potentially reaching differing conclusions. | The Government have specified that LA's can set their own standards. The fabric first approach does not simply reply on decarbonation of the grid (as per the national approach) and is also a more cost-effective approach as demonstrated in the supporting VA. | No | No |

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| 150 | _013/9 | Joanne Harding | Home Builders Federation | Part Two Development Management DPD | 9 | DM30a | 9.16 | General comment | The HBF considers that requirements for a Sustainable Design Statement are unnecessary, however, if the Council does decide to go ahead with this requirement it should ensure that the requirement is not overly onerous and is proportionate to the scale of the development. | LCC consider an energy statement an important submission document to evidence how the policy requirements are being met. | No | No |
| 151 | _013/10 | Joanne Harding | Home Builders Federation | Part Two Development Management DPD | 9 | DM30a | 9.16 | General comment | The HBF would also query the need to consider the whole life cycle emissions. These emissions are related to the materials and products that go into making our buildings and infrastructure, and are likely to include emissions caused by: extraction, processing and manufacture; transport, assembly and installation on site; replacement, refurbishment and maintenance; demolition and disposal. Therefore, they are much wider than just the development industry and are not under the control of the applicant and may be difficult to detail or to influence. | The policy is worded in such a way that it is clear that there will be a requirement to consider whole life cycle emissions, however is not requirement to calculate them. | No | No |
| 152 | _013/11 | Joanne Harding | Home Builders Federation | Part Two Development Management DPD | 9 | DM30a | 9.16 | General comment | Concerns over Viability in relation to low carbon energy and renewable technologies and how the design of buildings must facilitate climate adaptation and mitigation measures as well as ensuring that the structure and fabric can be retrofitted through the lifetime of the building. | The Council has accurately considered this information in the Viability Assessment evidence base report. | No | No |
| 153 | _013/12 | Joanne Harding | Home Builders Federation | Part Two Development Management DPD | 9 | DM30b | 9.16 | Objection | If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in the PPG. PPG ID: 56-014-20150327 states that where there is a 'clear local need, Local Planning Authorities (LPA) can set out Local Plan Policies requiring new dwellings to meet tighter Building Regulations optional requirement of 110 litres per person per day'. PPG ID: 56-015-20150327 also states the 'it will be for a LPA to establish a clear need based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement'. The Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas. The North West and Lancaster are not considered to be an area of Water Stress as identified by the Environment Agency (2021 Assessment of Water Stress Areas Update: https://www.gov.uk/government/publications/waterstressed-areas-2021-classification). Therefore, the HBF considers that requirement for optional water efficiency standard is not justified nor consistent with national policy in relation to need or viability and should be deleted. | The policy requirement in the CELPR was developed in collaboration with the relevant bodies. The council consider the policy to be sound. Adoption of the standards are supported by United Utilities and by the Water Efficiency in New Homes paper prepared by Water Resources West in accordance with the criteria in the PPG. | no | No |
| 154 | _013/13 | Joanne Harding | Home Builders Federation | Part Two Development Management DPD | 9 | DM30c | 9.44 | General Comment | The HBF is generally supportive of the use of modern methods of construction (MMC). Due to the variety of methods encompassed under the broad umbrella term, MMC, there can be confusion as to the true extent of MMC taking place in the homebuilding industry. It should be noted that the ability to scale up the delivery of MMC is determined by external factors as well as the appetite of home builders. The Council may also need to consider how the promotion of MMC would sit alongside the Council's other policies particularly those in relation to design or housing mix. the HBF considers that requirements for a Sustainable Design Statement are unnecessary, however, if the Council does decide to go ahead with this requirement it should ensure that the requirement is not overly onerous and is proportionate to the scale of the development. | Comments noted | No | No |
| 155 | _013/14 | Joanne Harding | Home Builders Federation | Part Two Development Management DPD | 9 | DM33 | 9.19 | General comment | The HBF concurs that seeking to reduce flood risk is laudable, however this could be at considerable cost for any developments in these areas, which could potentially have a significant impact on the delivery of homes. Costs associated with this policy will need to be carefully considered as part of the viability of any development. | Comments noted | No | No |
| 156 | _013/15 | Joanne Harding | Home Builders Federation | Part Two Development Management DPD | 9 | DM34 | 9.30 | General comment | The HBF agrees that wherever practicable, it is important to incorporate SuDS within planned major development schemes in line with the NPPF. However, it will be important for the Council to be flexible in relation to how SuDs are provided as devising an appropriate layout is going to require a very careful balancing exercise of many competing factors, particularly in relation to other planning policy requirements, the efficient use of land and the individual site circumstances. | Comments noted | No | No |
| 157 | _013/16 | Joanne Harding | Home Builders Federation | Part Two Development Management DPD | 13 | DM53 | 13.2 | Objection, General comment | The HBF does not consider it is necessary to make more connections to the heat network. The Council should be aware that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies. some heat network consumers do not have comparable levels of satisfaction as consumers on gas and electricity networks, and they pay a higher price. | The Government has rolled out new interim funding and is consulting on future funding support for low carbon/non-combustion based heating and cooling networks. The Government further considers the widespread deployment of district heating and cooling networks to be a key element of decarbonising thermal energy. The Council is aware that a very limited number of heat networks consumers have had issues with their heat networks providers. As alleviating fuel poverty is something that is forefront and also ensuring that residents are supplied with reliable and affordable service, the Council has included proposed policies which will require heat network providers to demonstrate compliance with appropriate technical standards (currently CIBSE's Heat Networks Code of Practice for the UK) (to address reliability) as well as be registered with the Heat Trust (to ensure customer protection and affordability). | No | No |
| 158 | _013/17 | Joanne Harding | Home Builders Federation | Part Two Development Management DPD | 16 | DM62 | 16:21 | Objection | It is not necessary for the Council to specify provision of EVCPs because of the Government's proposed changes to Building Regulations. | Comments noted. The Government have not published their response to the consultation 'Electric vehicle chargepoints in residential and non-residential buildings' which set out the proposed changes to be brought in through Building Regulations. As the Government's position on this is unclear, and the purpose of this review is to address the climate emergency and transport being a significant issue for District, it was considered necessary for the Council to specify the provision of EVCP's. | No | No |

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| 159 | _013/18 | Joanne Harding | Home Builders Federation | Part Two Development Management DPD | 16 | DM62 | 16.21 | General comment | The requirement for cycle storage within the garage provision is not entirely clear, it is not clear whether this is assumed to be included within the already stated size of 6m by 3m or whether there is an extra requirement, or whether alternate forms of provision would be considered appropriate. | The intention is not to require a garage size beyond 6mx3m. Elsewhere in the policy and Appendix E cycle storage requirements are set out, so for the sake of clarity the wording is to be removed. | Yes | No |
| 160 | _013/19 | Joanne Harding | Home Builders Federation | Part Two Development Management DPD | Apdx D | Apdx D | D5 | General comment | This shows that the dwelling thresholds have changed for on and off-site provision for open space. It is not clear what the evidence is for this change and why it is considered appropriate. It is also not clear whether the viability implications of this change have been considered. | The thresholds have not changed from the supporting evidence. The information in the adopted Local Plan has been superseded and is contained within the Open Space Provision in New Residential Development Planning Advisory Note and is already in use when determining planning applications. The CELPR therefore simply updates these figures for the purposes of clarity and consistency with the evidence base already in use. The Viability implications have been tested based on the thresholds set out in the PAN, which are now in the revised Appendix D, and are based upon the latest evidence produced by KKP which accompanied the adopted Local Plan. | No | No |
| 161 | _014a/1 | Tim Dant | Lancaster Green Spaces | Part One Strategic Policies and Land Allocation DPD | - | - | - | General comment | Please that Local Plan is being reviewed but would like to see it revisit housing numbers. | This is out of the confirmed scope of the CELPR. | No | No |
| 162 | _014a/1 | Tim Dant | Lancaster Green Spaces | Community Infrastructure Levy | - | - | - | Support | The Trust would encourage the principle of introducing a CIL throughout the District. The current system of development contributing to green space through S106 payments means that provision is related to a specific site and is always limited and tightly negotiated. This makes it much easier to seek contributions for children's play areas and playing fields and more difficult to get contribution for rewilding or maintaining existing areas of minimally managed green open space. CIL could allow the Council develop policy and a budget for different types of green spaces across the District that could include new spaces and innovative approaches to enhancing biodiversity. The Trust is not in a position to comment in detail on either the level of charges or the areas where CIL might be applied. However, it is surprising that there is no rate for the Strategic Sites and such a variation in rates and no rationale for not charging for flats and non-residential properties. And it appears that the largest zone of the District is within the Rural Exception areas – why should development in these areas not contribute CIL? The reasoning is presumably linked to viability but is unclear in the consultation. Loss of open space – including farmland – should be contributing to an infrastructure fund that can mitigate the overall impact. | The Viability Assessment addresses these matters. Strategic Sites have site-specific infrastructure requirements, including on and off site open space provisions/contributions resulting in insufficient viability for a CIL charge. The varying rates are based upon the viability headroom identified in the Viability Assessment. Rural exception sites are specific affordable housing exceptions not an charging area. The comments will be given due consideration as the City Council considers the scope and role of CIL within the district. | No | No |
| 163 | _014a/2 | Tim Dant | Lancaster Green Spaces | Part One Strategic Policies and Land Allocation DPD | - | - | - | General comment | CELPR has failed to reorient the Plan towards a different vision for Lancaster as a City of trees, or green space, as a healthy environment, as a safe environment for its citizens and a City prepared to tackle the consequences of the Anthropocene climate change. | Revision of the Development Strategy would have been outside of the scope of the review. | No | No |
| 164 | _014a/3 | Tim Dant | Lancaster Green Spaces | Heritage Action Zone (not part of the CELPR consultation) | - | - | - | General comment | Comments relate to the Heritage Action Zone work. | Comments have been passed to the Heritage Action Zone team on 25/10/21 by email. | No | No |
| 165 | _014a/4 | Tim Dant | Lancaster Green Spaces | DPD | - | - | - | General comment | Topic 1. Water management Green infrastructure has a role to play in water management that is not addressed: minimising accumulation of surface water and allowing slow absorption trees, shrubs and 'scrub' minimise run off topography can increase or decrease run-off and accumulation of water. The creation of 'building platforms' by reshaping topography changes the way water runs and accumulates. Original green spaces (agricultural land, woodland, open land) were shaped by millennia of water flow. Flooding is often treated simply as the rising of water level in water courses. But the shape of the land and the orientation of minor water courses, submerged or absent during dry periods, means localised flooding may occur in the short term beyond main volume levels. | The Council considers that the GBI Strategy does address the role that GI has to play in water management. The GBI Strategy is a key evidence base document which has informed the policies within the CELPR. | No | No |
| 166 | _014a/5 | Tim Dant | Lancaster Green Spaces | Part Two Development Management DPD | 9 | DM33 iv | 9.19 | General comment | DM33 – Has been altered to mention sequential approach to include 'play, recreation areas and gardens' in relation to areas of lowest risk of flooding. Does this contradict use of SuDs for recreation/play areas? See DM33 iv page 9. What about other informal green and woodland spaces? DM33 vii suggests taking 'opportunities to introduce natural flood management techniques on and off site to reduce flooding.' What are these techniques? Eg planting of woodland to slow and disperse minor watercourses could be mentioned. Much is made of SuDs but what actually counts as SuDs? | The policy seeks to ensure play/recreation and gardens are not within areas that flood. This does not affect the use of SuDs to drain such areas. It is not appropriate for a policy to define all such measures. Appropriate techniques will depend on the site. SuDs include all measures which mimic natural drainage. The policy however focuses upon above ground multi-functional SuDs. | No | No |
| 167 | _014a/6 | Tim Dant | Lancaster Green Spaces | Part Two Development Management DPD | 9 | DM34 | 9.30 | General comment | DM34 SuDs defined in terms of attenuation and marginal infiltration. No mention of planting to enhance infiltration and attenuation. Above ground attenuation is preferred but no mention of impact on recreation and play areas – e.g. danger to children of swales and ponds. No mention of building techniques (e.g. permeable outside areas such as drives and patios) to maximise infiltration and minimise run-off. SuDs and its impact not only changes topography but is attendant on existing topography – e.g. building platforms may increase run-off within a site, may put water courses under conditions of extreme inundation. Discouragement of storage tanks in contradiction to encouragement to recycle water – p20. How is water to be recycled from a pond or swale! | It is not appropriate for the policy to detail all elements of SuDs. 'Appropriate safety measures' added to the list of design criteria in DM34. The hierarchy refers to reuse of water including rainwater harvesting as the highest priority and then to infiltration which specifically refers to the use of permeable surfaces. The reuse of water, which may be via tanks, is included as a higher priority than ponds/swales etc. | Yes | No |
| 168 | _014a/7 | Tim Dant | Lancaster Green Spaces | Part Two Development Management DPD | 9 | DM35 | 9.51 | General comment | DM35 No mention of grey water collection and recycling, no mention of rainwater recycling. No mention of green recycling of waste water e.g. through reed beds. It should be noted that there is no such thing as a Flood Risk and Sustainable Drainage SPD on the Climate Review site (indeed it is difficult to find what is there!). Is it the same as the PAN? | The SPD is currently in preparation as set out in the LDS published on the Council Website and stated within the Water Management background paper (July 2021) which was published alongside the CELPR as a supporting background document. | No | No |

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| 169 | _014a/8 | Tim Dant | Lancaster Green Spaces | Part Two Development Management DPD | 9 | DM36 | 9.57 | General comment | DM36 Water resources Actually removes paragraph 9.67 which mentions water saving and recycling of water! | Plan is to be read as a whole and repetition of policy to be avoided. These issues are still included within the DPD but all within Policy DM30b which is entirely focused on water efficiency. | No | No |
| 17 | _014a/9 | Tim Dant | Lancaster Green Spaces | Part Two Development Management DPD | 11 | DM43 | 11.2 | General comment | DM43 Green and Blue Structure It is good to see a distinct shift in emphasis towards the green infrastructure and an articulation of its links with network of waterways. It is disappointing that there is no policy shift towards allotments and growing spaces. Expecting a proportion of the space of new developments to be identified for growing would be a start. Is any land identified for growing food in the SHEELA? Nowhere are the contradictions in the role for green and blue space recognised; blue space can be a risk for children, recreation activities can conflict with enhancing biodiversity, the aesthetics of green and open space are often an issue. Some people like weeds and brambles, others want mowed lawns and bedding plants. Some want space to grow food, others want space to kick a ball about. Marshy and boggy land is not good for human activities but is good for a wide variety of plants and animal life. | The Local Plan must be read as a whole with repetition avoided where possible. It is clear within the plan that the Council wishes to see additional allotment and food growing spaces within new developments within developments. Policy DM29 point XV in particular, however reference is also made at para 9.5, para 11.13 and policy DM57. | No | No |
| 171 | _014a/10 | Tim Dant | Lancaster Green Spaces | Part One Strategic Policies and Land Allocation DPD | 10 | SP8 | 10.4 | General comment | These are great sentiments... but it is not clear how the policy will have impact. It all hangs on the Green and Blue strategy. | Comments noted. | No | No |
| 172 | _014a/11 | Tim Dant | Lancaster Green Spaces | Land Allocation DPD Part One Strategic Policies and Land Allocation DPD | 23 | SC4 | 23.16 | General comment | Green and Blue Corridors and chains Again, good sentiments and new words for old but at least a shift in emphasis from 'investigating' to 'expecting' new developments to contribute and demonstrate it. Not sure how this will be measured or realised. Some of the proposals in the masterplanning for Bailrigg Garden Village (water taxis, marinas, many new bridges) will not comply with the thrust of this policy but that will not be the reason for not implementing them. Good to see the addition of the Condor, Lune and Keer. What about Newton Beck? Lucy Brook, Jelle Beck, Bowerham Beck? | The Masterplanning work by JTP for BGV is not adopted policy. Additional work by the Council on the BGV AAP will take place in the coming months. Comments on this are noted. Reference has been added to tributaries in policy SC4 and the background text. | Yes | No |
| 173 | _014a/12 | Tim Dant | Lancaster Green Spaces | Part One Strategic Policies and Land Allocation DPD | 23 | SC5 | 23.19 | General comment | No recognition of the tensions created by multi-functional use of green space | Comment noted. These are recognised through the GBI Strategy. | No | No |
| 174 | _014a/13 | Tim Dant | Lancaster Green Spaces | Part Two Development Management DPD | 7 | DM27 | 7.20 | General Comment | The loss of wild space is not mentioned unfortunately. Areas like Freemans Woods and the east area of Barton fields are unkempt and available for informal recreation alongside a habitat for birds, animals and flowers. The absence of tarmac and concrete mean that the land is available to absorb rainwater and the topography has not been altered. There can be many good reasons to retain such spaces as undeveloped within urban areas. | Comments noted | No | No |
| 175 | _014a/14 | Tim Dant | Lancaster Green Spaces | - | - | - | - | General comment | There is no mention of role of trees or green space in mitigation of transport generated air pollution. There is no mention of the impact of road building – e.g. revised Junction 33 and connected road system. | Policy DM31 considers air pollution. The updated supporting text also recognises the role that green infrastructure, in particular trees, can play in creating a barrier or maintaining separation between sources of pollution and receptors. There is also a forthcoming SPD being produced on the matter of air quality, once an Air Quality Action Plan is in place. | No | No |
| 176 | _014a/15 | Tim Dant | Lancaster Green Spaces | Part One Strategic Policies and Land Allocation DPD | - | - | - | General Comment | Comment on Transport: There is no mention of role of trees or green space in mitigation of transport generated air pollution. There is no mention of the impact of road building – e.g. revised Junction 33 and connected road system | J33propsoald are not yet finalised. Additional or on the BGV would consider these elements in more detail. | No | No |
| 177 | _014a/16 | Tim Dant | Lancaster Green Spaces | Part One Strategic Policies and Land Allocation DPD | 24 | T1 | 24.3 | General Comment | No change because it is 'doing its job'.... But where is the evidence of impact on modal shift? | Comment noted. The purpose of Policy T1 is to safeguard land for Park and Ride schemes. | No | No |
| 178 | _014a/17 | Tim Dant | Lancaster Green Spaces | Part One Strategic Policies and Land Allocation DPD | 24 | T2 | 24.7 | General Comment | Where is the evidence for 'high levels of walking and cycling'? Despite Cycling Demonstration Town, levels are surely persistently low. Some 'aspiration' cycling routes are currently greenspaces or footpaths (e.g. near Aldcliffe Road and near Barton Road). Such aspirational routes would reduce green infrastructure and its availability for pedestrian use. Loss of green space and hedgerows instead of loss of car space. Great concern over increasing delivery of these aspirational routes – no consultation locally! There is no 'identified opportunity' for cycle superhighway! There is no aspirational route proposed, just an aspiration to have a route... alongside the A6! 24.11 24.9 – reference to 'cycling network' that is incomplete. This needs to be the subject of a PAN or SPD and consultation of local users and potential users. Who would encourage a 12 year or 70-year-old onto Lancaster's cycle routes? Cycling infrastructure (locking, repair, recharging, hire etc.) needs to be discussed. T2 Does not mention the importance of segregation – cyclists from cars, pedestrians from cars and cyclists? Cyclists from cyclists going the opposite way. Briefly mentioned on p40. But segregation is a key issue for pedestrian and cyclist safety that needs tackling in policy. | Department of Transport statistics (based on the National Travel Survey and Actives Lives Survey 2018/19) shows that the Lancaster district has above average rates of cycling with 18.3% of the population cycling at least once a month. This compares with 16.1% for England and 13.8% for Lancashire. Reference to be added in supporting text. Aspirational routes are included as opportunities and have not been subject to preparatory or feasibility work. The issue was discussed at the Local Plan EIP and Aspirational routes were subsequently retained. The emerging LCWIP provides the principal mechanism to identify and deliver a comprehensive network and will be subject to consultation by the County Council. The County Council have yet to provide details of the CSH. Work on the South Lancaster AAP will include setting out network improvements and be subject to consultation. Agree segregation is important and is included in Policy T2. Supporting text to be amended to include more detail and reference to LTN1/20 guidance. | Yes | No |

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| 179 | _014a/18 | Tim Dant | Lancaster Green Spaces | Part One Strategic Policies and Land Allocation DPD | 24 | T2 | 24.11 | General Comment | 24.11 – the Cycling and Walking Strategy is banal, unspecific and out of date. Most importantly it continually fails to have any budget. Revised Fig. 24.1 is an improvement... but impossible to read in any detail. The ‘aspirational route’ extending to Wray is not the same as being pursued by Sustans which goes to Bentham not Kirkby Lonsdale. Presumably this is a mistake. There is no mention anywhere of how the Council will promote or support cycling or walking networks. There is no mention anywhere (except in 24.12 of the existing Lancaster-Morecambe and Lune Estuary paths) of the connection between green spaces and active travel. Cycling or walking on paths within green spaces and trees is far more attractive than cycling on or beside roads characterised by traffic fumes. There is a problem with shared use paths that is just not addressed. Electric scooters – both those seated for people with disabilities and those upright favoured by the young – threaten to make paths and cycleways dangerous for other users, particularly pedestrians. Will there be a hierarchy of users? | Comments noted. C and W Strategy is a County document and will be superseded by the emerging LCWIP. Figure 24.1 – city centre inset to be provided. Lune Valley route is based on latest Sustrans mapping. Link between active travel and GBI is made explicit in GBI Strategy. E-scooters are not being actively promoted within the district – more generally, a hierarchy of users is to be included in the revised Highway Code. | Yes | No |
| 180 | _014a/19 | Tim Dant | Lancaster Green Spaces | Part One Strategic Policies and Land Allocation DPD | 24 | T4 | 24.23 | General Comment | T4 p22 – what is the difference between Bus Rapid Transport and Better Buses? Just a label or avoidance of key issue of prioritised/segreated lanes for BRT? Which is unachievable on Lancaster’s roads. This is not the same as ‘no adverse impacts and potentially some benefits’ p24 which is the commentary. What are the European sites? | BRT has been renamed Better Buses by the County Council. An explanatory note will be added to Appendix A. Add ‘Better Buses’ to appendix A Glossary of Terms. | Yes | No |
| 181 | _014a/20 | Tim Dant | Lancaster Green Spaces | Part One Strategic Policies and Land Allocation DPD | 22 | EN9 | 22.48 | General Comment | P26 EN9 Air Quality – unchanged. No mention of Low Emission Zones or what anyone, including Council and developers are expected to do regarding air pollution. Complacent policy that has achieved very little | Comments noted. Work has begun on an Air Quality SPD which will provide further guidance on this. | No | No |
| 182 | _014a/21 | Tim Dant | Lancaster Green Spaces | Part Two Development Management DPD | 9 | DM31 | 9.46 | General Comment | How does this work? Where is the Lancaster Air Quality Action Plan – what can it possibly say? ‘Forthcoming SPD’ – kick it into the future. No mention of role of green infrastructure as mitigation of poor air quality. 9.17 ‘range of activities underway to deal with these issues’ – what are they? P31 – Here there is mention of green infrastructure as barrier from sources of pollution from Planning Practice Guidance. But this has had no visible impact on Lancaster policy? Why should anyone take any notice? P31 DM31 policy unchanged because it is ‘operating well’ – this is repeated but no evidence offered. (since all policies in the Local Plan are unlikely to have any effect unless reiterating national policy, it is easy to dismiss any proposed changes as not like to have any effect...) P45 Embedded here the risks to biodiversity and green spaces of cycling walking strategy are noted but this difficult area requires joined up thinking. Leisure use for cycling & walking can undermined green space assets. We need clear policy for dealing with conflict. | Comments noted. The Air Quality Action Plan is currently being developed. This will then be used to inform the emerging SPD which will provide further detail/ guidance as to how this policy is to be implemented. Evidence of air quality levels provided in Air Quality Statement Addendum. GBI Strategy emphases importance of joined up thinking, which has informed policy DM43. | No | No |
| 183 | _014a/22 | Tim Dant | Lancaster Green Spaces | Part Two Development Management DPD | - | Appendix E | - | General Comment | Where is Appendix E? Issue of mobility scooter and cycle parking and cargo bikes and bike trailers is important. ‘Appendix E being reviewed...’; just kick it into the future. | Appendix E update is included as part of this local plan review. It has not been postponed to ‘the future’. The updated information was available as part of the consultation with additional provision for all those aspects mentioned in the rep being included. | No | No |
| 184 | _014a/23 | Tim Dant | Lancaster Green Spaces | Part Two Development Management DPD | 16 | DM64 | 16.334 | General Comment | DM64 still includes Rapid Transport System... but Morecambe and Heysham removed from it. 11.7 & 11.9 still have it, with Morecambe and Heysham. ‘Car free development’! Where is that happening (Oh yes, Halton Cohousing... although even they have a car park and a car club) | Comment noted. Agree, need to reinstate reference to Morecambe-Heysham. | Yes | No |
| 185 | _014a/24 | Tim Dant | Lancaster Green Spaces | Part Two Development Management DPD | 10 | CCH1 & CCH2 | 10.56 | General comment | Heritage Policies CCH1 and CCH2 are an interesting development in recognising that reuse retrofitting, and refurbishment of buildings and the installation of micro-renewable energy sources can be energy efficient but there are risks to heritage assets. It is disappointing that non-building heritage assets are not mentioned. This would include for example ancient hedgerows, coppices and woodland. | The Policy seeks to address areas where there is specific control in relation to the built environment under the Planning (Listed Buildings and Conservation Areas) Act 1990. While the control of hedgerows and trees fall within the ambit of control but this is under the planning rather than heritage legislation. There are separate policies under DM45 which give protection for proposals in relation to historic hedgerows and woodlands. | No | No |
| 186 | _014a/25 | Tim Dant | Lancaster Green Spaces | Part Two Development Management DPD | 11 | DM44 | 11.17 | General Comment | currently suggests: Existing landscaping and natural features (such as trees, hedges, riverbanks and watercourses) should also be retained, where possible, to enhance biodiversity and create wildlife and recreational corridors. Proposals should not result in habitat fragmentation. Designed to enhance biodiversity, this policy does not recognise the irreplaceability of some vegetation features that may not be recorded as nationally designated or environmentally sensitive. The strategies of mitigation and compensation offered in DM44 neatly miss the irreplaceability of ancient vegetation | Policy DM44 did not form part of the scope of this Review. The policies proposed for review were consulted on as part of the Scoping consultation. | No | No |
| 187 | _014a/26 | Tim Dant | Lancaster Green Spaces | Part Two Development Management DPD | 4 | DM2 | 4.15 | General comment | It is unfortunate that the national space standards make no mention of accessible outside or green space and DM2 doesn’t either. The Covid 19 pandemic showed how important gardens and even balconies are for residential accommodation for maintaining the capacity for residents to get access to fresh air. Green space and the ability to grow plants – even in planters on a balcony or patio – greatly assisted the mental health and general wellbeing of those who were able to get access to them. The failure to successfully enforce minimum space standards, especially in so-called ‘affordable’ homes, means that many residents are deprived what would have been regarded as the acceptable circulation space under Parker Morris standards. | Comment noted. National space standards are set by Central Government and unfortunately, we have no control over these at a local level. The Council has adopted open space standards. The Green and Blue Infrastructure Strategy, which has played a key role in informing and underpinning the CELPR aims to further highlight the important role of accessible greenspace and to emphasise the importance of considering the role and purpose of GBI when designing development proposals. A document which hasn’t existed for the Lancaster District before. The Strategy also recognises the relationship of GBI with socio-economic factors and has a specific section on this. | No | No |
| 188 | _014a/27 | Tim Dant | Lancaster Green Spaces | Part Two Development Management DPD | 9 | DM29 | 9.2 | General comment | Paragraphs XIII, XIV and XV do mention green space and green and blue infrastructure. And they also mention ‘appropriate garden space’ and ‘opportunities for food growing’ as well as buffer zones and open space provision. The supporting text indicates 50 sq metres for new houses with at least 10metres in depth. But there is no variation for the size of house or the maximum number of intended residents. And there is no similar standard for flats – no mention of balconies. There is no indication of how areas might be set aside for food growing or what residents might reasonably expect of developers (e.g. tool storage, sufficient depth of topsoil, adequate surface drainage) Without some more precise indication of standards that are expected both at a development and at a dwelling level, these policy statements are a very weak indication of the Council’s aspiration. While it is typical of the drafting of the Local Plan to have vague and equivocal statements that merely require a developer to ensure can offer a written response to, there is a missed opportunity to indicate how much | The Council considers that the introduction of requirements brought in as part of the CELPR are a significant step forward from the adopted plan. The council do not consider the requirements to be vague or weak within the legislative and soundness requirements that must be met. The Council has adopted open space standards through planning policy. In relation to the queries regarding food growing spaces, these will be explored as part of the preparation of a forthcoming SPD on ‘Building energy efficient homes and enabling zero miles food | No | No |

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| | | | | | | | | | <p>outdoor space, either as percentage of total indoor area or a square meterage per resident, what is what is required for development to be approved. The same could be done for apartment blocks. Such specifications can have a get out clause (e.g. ‘unless there are exceptional circumstances’) which can then be a matter of public record and debate. One of the ways to mitigate the climate impact of new development is to increase the density of development which will reduce travel and allow more people to live nearer to facilities and work. But increasing housing density may conflict with outdoor/green space requirements. This is an issue that has not been addressed in the local plan review. Linked to this is requiring developers to include facilities onsite to maximise the sustainability of the development. Under the current regime it is developers that plan, not planners, and so they need to be encouraged to do that; to think of the relationship between their proposal for development and the surrounding community. Clearly the statement on Gateway locations is meaningless given that the Filter House student development was approved and makes an obtrusive and ugly gateway from the south to Lancaster. The detail in 9.12 about nesting and roosting sites is to be welcomed but it is noticeable that there is no similar concern for small animals. Voles, field mice, hedgehogs, rabbits, weasels and so on benefit from ‘untidy’ and not too flat areas. They also need corridors if there are fences and walls. Green spaces that are not primarily for human recreation should be mentioned and described somewhere and clear requirements specified for gaps in hedges and walls for small animals (don’t mention rats – they manage just fine...).</p> | <p>growing’. This will include guidance on hedgehog holes, nesting bricks, lighting variations etc.</p> <p>The GBI Strategy recognises that GBI covers a wide range of types and uses. Therefore, to help break this down, 6 key themes were identified, one of which was ecology and biodiversity. So there’s a specific section in this which recognises that green spaces are for nature too, not just humans. The need to consider this function is referenced in DM43 and DM27.</p> <p>The GBI Strategy also promotes an onsite approach to the delivery of GBI, highlighting the multifunctional role and importance of connectivity when designing GBI into development proposals from an early stage.</p> | | |
| 189 | _014a/28 | Tim Dant | Lancaster Green Spaces | Part Two Development Management DPD | 9 | DM30a | 9.16 | Support, General Comment | DM30a Sustainable Design and Construction New Development, p20 It is at least a decade too late but DM30a is to be commended for setting out clear targets for energy and carbon reduction. This policy is central to the Climate Change review of the Local Plan and it has been carefully drafted. The energy statement requirements and the link to Passivhaus and Breeam standards helps to make the whole policy as clear as it can be. It is noticeable that there is no mention of mechanical ventilation and heat recovery until the requirements for the sustainability statement. There is no indication of preferred practices for reducing thermal bridging. | Comments noted | No | No |
| 190 | _014a/29 | Tim Dant | Lancaster Green Spaces | Part Two Development Management DPD | 9 | DM30b | 9.40 | General comment | DM30b Sustainable Design and Construction – Water Efficiency, p28 The wording asks developers to ‘consider’ water efficiency measures and submit a sustainable design statement. This is a notably weaker approach to that set out in DM30a. Developers should be ‘expected’ or ‘required’ to introduce water efficiency measures and demonstrate in the statement that they are building to enable achievement of the standard of 110 litres a person a day (grey water recycling is probably the easiest way to achieve the standard). Integrating grey water and rainwater gathering systems is much cheaper and simpler to do while building than afterwards and there could be more guidance in the text. Underground storage may be appropriate and easily linked to a soakaway or sewer for excess. It is well worth linking water efficiency to SUDs; rainwater dispersal can be slowed if it is retained for reuse on site. Developers need exemplars of good practice to follow. | Policy DM30b states that new residential development ‘must’ achieve the optional Building Regulations G2 requirements (110 l/p/d). This is as far as the LPA can require water efficiency measure to be included in accordance with the NPPF and nPPG. The however than goes on to encourage additional measures. | No | No |
| 191 | _014a/30 | Tim Dant | Lancaster Green Spaces | Part Two Development Management DPD | 9 | DM30c | 9.44 | General comment | DM30c Sustainable Design and Construction – Materials, waste and construction Most development is deeply unimaginative and a reason is the continued resistance of planning departments to encourage and support anything other than traditional styles of housing; detached or semi-detached, high pitched roofs, patio doors, four walls and four corners. Such traditional designs that mimic a child’s drawing of a ‘house’ (I have even seen a proposal to add a chimney on a small development to make it look ‘traditional’!) need to be broken with. Making it clear that designing for sustainability is more important than fitting in with existing design could be done within this policy or DM29. Curved junctions of walls can reduce thermal bridging for example and incorporating green and blue roofs and walls can help biodiversity and water retention. But these things do not fit with the tendency for planners to seek ‘sympathetic slate or tile’ and ‘brick with stone quoins’ and so on... Perhaps the supporting text needs to be developed more here... | The council considers the fabric first approach will encourage new/ varying developments/schemes to the current offer occur. | No | No |
| 192 | _014a/31 | Tim Dant | Lancaster Green Spaces | Part Two Development Management DPD | 13 | DM53 | 13.2 | General comment | This policy reads as applying to setting up energy generation sites – a windfarm or solar farm for example. It is not clear where or how energy generation is encouraged at the development site or individual property level. In DM30a a fabric first policy is presented which has much to commend it. But it does not promote on-site energy generation – e.g. the installation of solar panels as standard or the provision of a combined heat and power system for an estate – these are much cheaper to install in new build than retrofit later. Nowhere is it clear policy that any new industrial building should meet insulation standards and maximise the use of roof space for solar generation. DM 53 should be directed to supporting energy generation on existing buildings with solar panels (and windmills although these might often have to negotiate restrictive regulations. Farms and barns could be encouraged to do both solar and wind generation!) | Comments noted | No | No |
| 193 | _014a/32 | Tim Dant | Lancaster Green Spaces | Part One Strategic Policies and Land Allocation DPD | 8 | SP4 | 8.8 | General comment | SP4 Priorities for Sustainable Economic Prosperity, p5 It is noticeable that ‘growth’ has been replaced by ‘prosperity’ in the title but appears seven times in the bullet points below. Growth seems to still be the aim of the policy! The idea of ‘sustainable growth’ needs unpacking; it is a contradiction in terms. What does SP4 mean by ‘sustainable’ in relation to prosperity? The strengths and threats analysis is focussed exclusively on money making activities and growth in economic activity. The damage to the green prosperity of undeveloped or underdeveloped land (e.g. grazing land) needs to be recognised as a ‘threat’. Risks to health and wellbeing, loss of biodiversity and habitat, reduction of open space are also threats. Somewhere the idea of doing nothing should be recognised as having value. Leaving land undeveloped is good for biodiversity, good for air quality and good for leisure and recreation. Undeveloped land can contribute to sustainable prosperity and should be considered of economic value even though it is unlikely to produce income. | Comments noted. It should be noted that growth does not simply mean expansion of existing facilities (or creation of new) but also the diversification and regeneration of existing spaces and places. Any growth which does involve the use of greenfield sites will be on the basis of the allocations set out in the Local Plan. | No | No |
| 194 | _014a/33 | Tim Dant | Lancaster Green Spaces | Land Allocation DPD | 11 | SP9 | 11.1 | General comment | SP9, Maintaining Strong and Vibrant Communities, p11 While containing laudable sentiments, it is unclear how the policy will have any effect or impact. The additional paragraph adds reference to climate resilient development but this topic is dealt with specifically and in more detail elsewhere. Again, ‘sustainable’ is used as a buzz word without having any meaning. The two paragraphs added to the supporting text on p12 have a bit more meaning but the idea of development that mitigates and adapts to climate change leading to ‘strong and vibrant communities’ is fundamental to the whole Local Plan. Does it add anything? | The proposed paragraph that has been added to SP9 aims to highlight the ‘golden thread’ of tackling climate change that the council feels should be emphasised within a policy concerned with maintaining strong and vibrant communities. It is considered that this does add an important component to the plan and ensures that climate change mitigation and adaption is at the heart of decision making and plan making. | No | No |
| 195 | _014a/34 | Tim Dant | Lancaster Green Spaces | Part One Strategic Policies and | 13 | SG4 | 13.2 | General comment | SG4 Lancaster City Centre, p16 It is difficult to think of another City Centre so lacking in green open space or public parks than Lancaster. There is a limited amount of green in the small but heavily built Dalton Square, Green Ayre provides a precious area of green space close to the city centre as do the green fields below the priory (Vicarage Field and Quay Meadow). Further away Scotch Quarry provides some urban green space as does Greaves Park and the Fairfield Nature Reserve and Orchard. The importance of these green spaces which are peripheral to the city centre should be emphasised – they provide recreation and play spaces, trees that improve the air quality and a respite from buildings and traffic. Most of this policy is focussed on economic money-making activity and the added paragraph follows this line with the attention on ‘economic potential’ only ameliorated by the significance of historical core. The canal is mentioned as a ‘green corridor’ which is something – although within the city centre it provides little in the way of green space. Lancaster City Centre is dominated by parking lots it feels as if the open spaces have been tarmacked over (we’ve ‘paved paradise and put up a parking lot’). | Comments noted. It is important to note that the Local Plan to be read as whole, and so the importance of green spaces is specifically covered in other policies. However, an additional criterion has been added into the revised wording of this policy, recognising the importance of green and blue infrastructure networks both within and connecting to the city centre. | No | No |

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| 196 | _014a/35 | Tim Dant | Lancaster Green Spaces | Part One Strategic Policies and Land Allocation DPD | 17 | SG13 | 17.14 | General comment | SG13 Heysham Gateway, South Heysham, p21 Paras III, IV, V and VI already recognise the environmentally sensitive areas that need to be protected at the same time as promoting this area for industrial and employment opportunities. | Comment noted. | No | No |
| 197 | _014a/36 | Tim Dant | Lancaster Green Spaces | Part Two Development Management DPD | 14 | DM57 | 14.16 | General comment | DM57 Health and wellbeing, p26 This policy already says the right things... but just how does it actually promote food growing? Beyond private gardens which are small and often prepared with some topsoil and turf over rubble, which developments in the last five years have offered any food growing? There is a tension between these infrastructure needs that is never explored. <i>Ensuring that infrastructure is in place to support development, such as providing or contributing to open space, children's play facilities, food growing, indoor and outdoor leisure provision and healthcare facilities; Protect, increase and enhance open space provision, allotments and food growing schemes, biodiversity and nature conservation assets and the provision of children's play facilities;</i> | The policy does what it can in planning terms. It ensures that the opportunity for food growing is provided in new development. | No | No |
| 198 | _014a/37 | Tim Dant | Lancaster Green Spaces | Part Two Development Management DPD | 15 | DM58 | 15.2 | General comment | DM58 Infrastructure Delivery and Funding, p31 CIL might provide a sufficiently large pot of money to fund new green spaces and woodland outside new housing developments. Currently developers like to propose small areas not suitable for building more houses as 'green spaces' within their developments. It would be more useful if larger green and wooded spaces could be created by combining the contributions from a number of sites via a CIL fund. Play areas and playing fields should not be the main focus of new green spaces; areas with indigenous tree species and scrub with paths should be recognised as valuable for recreation and environment as well as biodiversity. | The comments will be given due consideration as the City Council considers the scope and role of CIL within the district. | No | No |
| 199 | _014b/01 | Simon Gershon | Lancaster Green Spaces | GBI Strategy | - | - | - | General comment | Pleased to see the production of this Strategy, comprehensive but some gaps that need to be identified. Approach of Strategy is at odds with our own vision for Lancaster District, as the Strategy is predicated on control of nature, rather than seeking to understand and live in with natural processes. The phrase 'green infrastructure' suggests nature can be fully controlled, but nature is self-determining to a large extent. Our vision is one where we are largely self-sufficient for food, timber and energy from within our own bioregion, and where humans are integrated into the natural landscape. | Comments noted. 'Green infrastructure' is the term set out within the National Planning Policy Framework that is to be used when referring to green and blue assets in the context of planning. We recognise that nature is self-determining to a large extent, but it is important that we plan for and design GBI into development proposals to ensure space is provided for nature to flourish, and the right type of space in the right place, to ensure it is not an add on afterthought. We seek to ensure GBI is considered at the start of the design process to ensure the best outcomes are achieved for our natural environment. | No | No |
| 200 | _014b/02 | Simon Gershon | Lancaster Green Spaces | GBI Strategy | - | - | - | General comment | Accept that such a Strategy relating to the natural environment has to strike a balance between trying to cover everything nature-related and being more focussed on urban-centric aspects. Some of the actions suggested will produce only marginal benefits, efforts will be better applied to policies and practices likely to create a tangible impact. Should seek advise on likely quantitative outcomes of environmental actions. | Comments noted. One of the main purposes of this GBI Strategy is to underpin the Local Plan Review and inform the policies being revised as part of the review, which includes those which specifically relate to GBI. So the findings of this Strategy have fed directly into planning policies that will be applied when determining planning applications (as set out in Appendix X). The Council is also looking to complete the table set out in Appendix 4, identifying projects which on the ground will help to achieve the objectives set out in the Strategy. Agree that quantifying outcomes in terms of GBI provision/enhancement is difficult, but from an ecological perspective the biodiversity net gain metric will help with this. To provide further guidance once biodiversity net gain becomes a mandatory requirement through the Environment Bill the Council is seeking to produce an SPD on this, which will include the requirement to use the latest metric produced by Natural England. | No | No |
| 201 | _014b/03 | Simon Gershon | Lancaster Green Spaces | GBI Strategy | - | - | - | General comment | Very little engagement with re-wilding agenda. There is significant benefit in allowing nature to determine its own course. Wild areas have special value for young people. John Muir Award Scheme is delivered in many schools. GBI definition on p.11 excludes wild places, as they won't be 'designed and managed'. Definition should include spaces that are deliberately un-managed/minimally managed. | Comments noted. Agree it would be beneficial for the GBI Strategy to explore the re-wilding agenda more. Within the context of planning wild areas to an extent need to be planned for, and subsequently designed and managed and so it is considered that the adopted definition incorporates wild places (natural areas). | No | Yes |
| 202 | _014b/04 | Simon Gershon | Lancaster Green Spaces | GBI Strategy | - | - | - | General Comment | Lack of policies relating to farming practices. Agri-environmental schemes are playing an increasing part in national farming strategy. Acknowledge farms are independent businesses, but their practices directly and indirectly impact GBI. Would be desirable to set up a mechanism to engage with local farmers. Areas for improved outcomes may include: reducing peak rainwater run-off – finding ways to 'slow the flow' using NFM, improving run-off water quality, improving chemical infiltration into groundwater, working with farmers on tree planting/management schemes, schemes to promote biodiversity such as restoration of hedgerows, promoting more local food production for local consumption. | Comments noted. Agree it would be beneficial to explore the linkages with agri-environmental schemes and farming, particularly through emerging Local Nature Recovery Strategies. Agree farming practices impact upon GBI but the ability of planning to influence this is limited. Through the GBI Strategy are exploring ways to slow the flow using NFM, identify tree planting opportunity areas etc. In addition, both AONBs within the district are running DEFRA schemes called a 'Farming in Protected Landscapes' Programme. They are 3yr pilots for the changes to the existing farm payment schemes. | No | Yes |
| 203 | _014b/05 | Simon Gershon | Lancaster Green Spaces | GBI Strategy | - | - | - | General Comment | Would like intrinsic value of non-human nature to be recognised within this policy. Currently just refers to natural environment purely as a resource for human benefit. Strategy needs to better recognise value of plants and animals. More wild areas should be set aside. Area relatively undisturbed by people, such as ancient woodlands, should be afforded protection. | Comments noted. Ancient woodlands are already protected through planning policy. As the GBI interactive map evolves we hope that it will become a useful tool to help identify opportunity areas that would be appropriate for wild areas. Through the Council's Grassland Management Strategy areas have been identified that should be left un-mown and become wildflower meadows, and these areas have been identified on the GBI interactive map. The Strategy looks at ecology/biodiversity as a separate theme and value of GBI (recreation is another one) and so it's felt that the intrinsic value of non-human nature not just for human benefit is recognised. As the GBI Strategy recognises, the anthropogenic and natural aspects of GBI are intrinsically linked, no one space necessarily provides one function. They are multi-functional spaces. | No | No |
| 204 | _014b/06 | Simon Gershon | Lancaster Green Spaces | GBI Strategy | - | - | - | General Comment | 'England Trees Action Plan 2021-24' and 'England Peat Action Plan' should inform this Strategy. Council's ambition of planting one million trees is impressively large, but unsure of substance and timescales. Would require between 52,800 and 132,00 trees to be planted per year. Lancaster District has higher proportion of | Comments noted. A Strategy for the Million Trees project is currently being explored. | No | Yes |

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| | | | | | | | | | grade 4 and 5 agricultural land than national average. Opportunity to join up to the ‘Lancashire Woodland Connect’. Suggests that tree planting takes place along river tributaries to provide suitable habitat for beavers. | It is understood the 2 Action Plans mentioned were published around the same time as the GBI Strategy and so they could not be taken into consideration at that stage, but will be looked into. | | |
| 205 | _014b/07 | Simon Gershon | Lancaster Green Spaces | GBI Strategy | - | - | - | General Comment | p.8 Use of the word 'wastelands' should be avoided, as it suggests a denigrating anthropocentric attitude to land that may be suitable habitat for some species. | Commented noted. This definition of natural semi-natural greenspace was adopted from Natural England guidance. | No | No |
| 206 | _014b/08 | Simon Gershon | Lancaster Green Spaces | GBI Strategy | - | - | - | General Comment | p.21 Peatland Restoration: While peatlands do indeed store very large amounts of carbon, which will be released when they are degraded, this does not mean that well functioning peatlands will sequester much additional carbon. A study by Forest Research (2020) finds that: Net rates of carbon sequestration by Britain’s blanket bogs have averaged removal from the atmosphere... of 0.4–1.1 t CO ₂ ha-1 yr-1 over the thousands of years they have been accumulating.10 Therefore, the district's peatlands will only be able to make a very limited contribution to our net zero carbon target. | Comments noted. This will be explored as part of the next iteration of the GBI Strategy. | No | Yes |
| 207 | _014b/09 | Simon Gershon | Lancaster Green Spaces | GBI Strategy | - | - | - | General Comment | p.30 'Establish policies to retain native, existing, well established and mature trees and hedgerows.' We suggest this be augmented by: 'Establish policies to manage trees, woodlands and hedgerows'. The traditional crafts of coppicing, pollarding and hedge-laying extend the longevity and wildlife value of these features. We hope that a district wide tree strategy will be produced, which will no doubt include this. | Comments noted. The points set out on p.30 are proposed recommendations that were made during the Local Plan Review Scoping consultation. The Council is exploring producing a District-wide Tree Strategy. | No | No |
| 208 | _014b/10 | Simon Gershon | Lancaster Green Spaces | GBI Strategy | - | - | - | General Comment | p.40 Health and Well-being section: add: Enable nature-based play | Comments noted. Will add in. | No | Yes |
| 209 | _014b/11 | Simon Gershon | Lancaster Green Spaces | GBI Strategy | - | - | - | General Comment | P.41 add economic benefit group: Householders and businesses, with the benefit of: Fuel and GHG saving through use of locally produced fuelwood, displacing fossil fuel use. There are several national and regional studies, and we note that Bowland Bioenergy Ltd is a commercial supplier of locally produced woodchip and logs. | Comments noted. This will be explored as part of the next iteration of the GBI Strategy. | No | Yes |
| 210 | _014b/12 | Simon Gershon | Lancaster Green Spaces | GBI Strategy | - | - | - | General Comment | p.50 Green corridors - '...wildlife mitigation' we think should say '...wildlife enhancement' | Comments noted. Agree ‘enhancement’ would be more appropriate here instead of ‘mitigation’. | No | Yes |
| 211 | _014b/13 | Simon Gershon | Lancaster Green Spaces | GBI Strategy | - | - | - | General Comment | p.53, Local green spaces section: add 'and designated' after 'Local Green Spaces have also been identified...' | Comment noted. Considered that being identified through a policy is same as being designated. | No | No |
| 212 | _014b/14 | Simon Gershon | Lancaster Green Spaces | GBI Strategy | - | - | - | General Comment | p.60. It would be helpful to provide a glossary in the document for all these acronyms (e.g. SPA/SAC. How is it possible for there to be 'approximately 19,0999 [sic] Hectares'? we don't think it can be correct that there are there are 'approximately 250 Biological Heritage Sites in Lancaster District.' Maybe this figure is for Lancashire? How many then just in Lancaster District? Local Nature Reserves: This designation for FAUNA nature reserve is imminent | Comments noted. Agree a Glossary of acronyms would be a useful addition to the Strategy – a link will be made to the Data Sources List which explains the terms used and data. There are 288 Biological Heritage Sites in the District. | No | Yes |
| 213 | _014b/15 | Simon Gershon | Lancaster Green Spaces | GBI Strategy | - | - | - | General Comment | p.68 For NCAs Bowland Fringe and Bowland Fell, add 'Farming practices' as a Regulation service | Comment noted. Whilst it is recognised that farming is a service provided, that is considered will play a greater role as a regulation service to bolster the resilience of the GBI network to combat climate change, this list of Regulation services was taken directly from a Natural England NCA document. The role of farming practices will be explored more in the next iteration of the GBI Strategy. | No | Yes |
| 214 | _014b/16 | Simon Gershon | Lancaster Green Spaces | GBI Strategy | - | - | - | General Comment | p.72 Key urban landscapes: We suggest that the Moor Hospital should be removed from this list as it is now a private housing estate and replaced by the FAUNA Nature Reserve. | Comments noted. A review of the local landscape designations is beyond the scope of the Local Plan Review. It is also not clear which area is being referred to. The Fauna Nature Reserve is designated as Urban Setting Landscape in the adopted Plan. It remains undeveloped for housing. Land surrounding the Moor Hospital has been developed, the area developed is not included within a local landscape designation. | No | No |
| 215 | _014b/17 | Simon Gershon | Lancaster Green Spaces | GBI Strategy | - | - | - | General Comment | P.73. Tree coverage you say was known in 2010. What was this figure, and where did it come from? | This figure came from the Woodland Trust and tree cover across the district was estimated to be approximately 6.9% in March 2010 compared to 9.9% for England. | No | No |
| 216 | _014b/18 | Simon Gershon | Lancaster Green Spaces | GBI Strategy | - | - | - | Objection | P.75/76 We realise that this section is on Active travel, but it would be desirable to mention the preferred transport hierarchy, with public transport in the second tier. You say: 'The primary reason, however, is that the district benefits from an excellent network of off-road pedestrian and cycle routes. These provide safe and attractive links between the main urban areas of the district and beyond to areas of attractive countryside.' We disagree strongly with this statement While there are some heavily used off-road routes such as the Lancaster-Morecambe cycleway (old railway line), the vast majority of mileage used by cyclists and pedestrians, is the road network including its adjacent pavements. An acceptable alternative wording for us would be: 'The primary reason, however, is that the district benefits from a good network of on- and off-road pedestrian and cycle routes.' Wonder if we should add that these off road cycle routes are not accessible from the majority of the houses in the district, without having to use busy roads to get onto them. | Comments noted. The on road routes are used but they need improvement and that’s what stops more people cycling. The off road routes get much higher volumes and are the focus of the network. | No | Yes |
| 217 | _014b/19 | Simon Gershon | Lancaster Green Spaces | GBI Strategy | - | - | - | General Comment | p.78 Key waterways: should the River Wyre be included here? P. 80 River Wyre, characteristics. Is it correct that the river is sometimes below sea level? | Comments noted. Will explore whether the River Wyre should be included as part of the next iteration of the GBI Strategy. The lower sections of the River Wyre are tidal, and as such, the water levels within the River Wyre fluctuates not only with the amount of water flowing down the river but also with the tidal cycle. That is why the water levels within the lower River Wyre are lower sometimes than other times. The River Wyre itself, is not a pumped river so therefore water levels within the river would always be relative to the level of the sea, they would not fall below the level of the sea. | No | Yes |
| 218 | _014b/20 | Simon Gershon | Lancaster Green Spaces | GBI Strategy | - | - | - | General Comment | p.90, mitigation column: while it is correct that all green spaces absorb CO2, (in the daytime), this does not entail a reduction in emissions, because plants also respire and decompose. This also applies to the Landscape section on p.91 adaption column: para 1 should also mention the value of trees, for both shade and their cooling effect through transpiration. Para 3: It is the allotments per se, rather than any enhancement of their soil quality, that reduces food insecurity | Comments noted. This will be explored as part of the next iteration of the GBI Strategy. | No | Yes |
| 219 | _014b/21 | Simon Gershon | Lancaster Green Spaces | GBI Strategy | - | - | - | General Comment | p.91, Ecology and biodiversity, mitigation column: Woodlands are not necessarily a large net absorber of CO2. Only immature woodlands are. Mature woodlands loose as much CO2 as they absorb, since the rate of decomposition is equal to the rate of growth. Although some of the atmospheric carbon is retained in a slowly increasing soil/humus layer, some decomposition emits methane which is many times more potent as a greenhouse gas. Of course, if biomass is removed and not burnt e.g. by using it as construction timber, then a sustainably managed forest is a net carbon sink. | Comments noted. It doesn’t really matter if the rate of decomposition is equal to the rate of growth, because even if its net zero, it’s still not emitting more than it’s absorbing. Bit that does need changing is the section below (landscape, mitigation, page 91) to change “All green space absorbs CO2 from the atmosphere” into “all well-managed/maintained green space” or “the majority of green space”. Methane comment is a fair point, but we state CO2, and it only really happens when they are submerged in water (eg. Tropical wetlands, when creating a new | No | Yes |

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| | | | | | | | | | | reservoir), so it is much more marginal here. Plus we’re focusing on planting trees and improving the maintenance of GBI, therefore decomposition should reduce. | | |
| 220 | _014b/22 | Simon Gershon | Lancaster Green Spaces | GBI Strategy | - | - | - | General Comment | P.92 Historic Environment section, mitigation column. The same argument applies to Green Spaces and trees here. New street trees, especially of large-growing species, will however lock up carbon for their lifetime of 100 years or more. We would also add here the request that larger trees have far more wildlife value, and there are some species that are more appropriate for our historic townscape than others e.g. large and small leaved lime Historic Environment section, adaption column: We don't agree that historic buildings 'are planned to function without the intensive energy uses of modern buildings'. While traditional building materials often have less embodied energy than modern ones, the standard of comfort that current users demand, requires buildings to be more thermally efficient and draft-free than they were originally designed to be. Therefore sympathetic upgrading of historic buildings is often required. | Comments noted. This will be explored as part of the next iteration of the GBI Strategy. | No | Yes |
| 221 | _014b/23 | Simon Gershon | Lancaster Green Spaces | GBI Strategy | - | - | - | General Comment | p.108 We suggest that a further key issue is the lack of true partnership working between the City Council and the many 'Friends of' groups working in the district. | Comment noted. This is something the Council seeks to improve and promote through the work and implementation of the GBI Strategy. Colleagues in Public Realm have a very closer working relationship with Friends Group and are in contact with many groups on a regular basis. Whilst the pandemic and redeployment has meant there have been restrictions on what Public Realm have been able to do this has not resulted in a lack of partnership. | No | No |
| 222 | _014b/24 | Simon Gershon | Lancaster Green Spaces | GBI Strategy | - | - | - | General Comment | p.109 Emerging opportunities. We are sceptical of the value of setting up a Tree Warden scheme. Although it was not in operation for long under Maxine Knagg's direction, it was not well subscribed and took up a good deal of her time that would probably have been better employed elsewhere. The author of these comments was one of these tree wardens. We are however very keen that the City council creates the post of Tree Officer. That's is, not a 'Tree protection officer' based in the Planning department, but someone complementary to this role, based in Environmental Services. | Comment noted. The Council has been working on setting up a Tree Warden scheme over the last few months and have a good relationship with the Tree Council who organise this. Looking to launch at the end of November. So far the mailing list has been very well subscribed to. | No | Yes |
| 223 | _014b/25 | Simon Gershon | Lancaster Green Spaces | GBI Strategy | - | - | - | General Comment | Another opportunity (and suggested priority) is the creation of masterplans for all sizeable parks. Not all have these yet in the district, in particular Vicarage Fields/Quay Meadows. | Comments noted. Vicarage Fields and Quay Meadows do have a Masterplan. Other parks & open spaces that have masterplans are; Williamson Park, Happy Mount Park, Ryelands Park, Regent Park, Greaves Park, Miss Whalleys Field, Barley Cop Woods and Torrisholme Cemetery. | No | Yes |
| 224 | _015/01 | Amy Kennedy | Natural England | Part One Strategic Policies and Land Allocation DPD and Part Two Development Management DPD | - | - | - | Support | Overall Natural England support the proposed changes. | Support noted | No | No |
| 225 | _15/02 | Amy Kennedy | Natural England | Part One Strategic Policies and Land Allocation DPD | 6 | CC1 | 6.5 | Support/General Comment | Support the introduction of Policy CC1 and welcome the inclusion of Biodiversity Net Gain. Believe that the policy could be strengthened through the inclusion of soil as an important natural resource which should be protected and can contribute to mitigating climate change through carbon storage and sequestration. Additional advice on soils has been provided via an appendix to the comments. | Comments noted. The Council agree that soils are an important natural resource. Opportunity to strengthen the Plan to reflect this will be investigated. | Yes | No |
| 226 | _15/03 | Amy Kennedy | Natural England | Part One Strategic Policies and Land Allocation DPD | 10 | SP8 | 10.4 | General Comment | Support proposed changes but believe the policy wording could be strengthened through the inclusion of references to the Nature Recovery Network. Advise that reference should also be made to the Local Nature Recovery Strategy. | Comments noted. The Council agree that these should be referenced within the Plan. | Yes | No |
| 227 | _15/04 | Amy Kennedy | Natural England | Part One Strategic Policies and Land Allocation DPD | 23 | SC4 | 23.16 | General Comment | Support proposed changes but believe the policy could be strengthened through inclusion of reference to the Nature Recovery Network. | Comments noted. The Council considers that the most appropriate place to include reference to the Nature Recovery Network in the Plan is in policy SP8. | Yes | No |
| 228 | _15/05 | Amy Kennedy | Natural England | Sustainability Appraisal | - | - | - | General Comment | Pleased to see amendments have been made to the Scoping Report to reflect earlier comments. On this basis NE concur with the conclusions and the proposed scope set out in the SA Scoping Report. Reiterate previous comments that it is important to ensure that the SA includes suitable monitoring indicators. | Comments noted. The importance of monitoring is recognised and will be included as part of the SA report for the Local Plan Review. | No | No |
| 229 | _15/06 | Amy Kennedy | Natural England | Habitats Regulations | - | - | - | General Comment | Concur with the conclusions of the HRA Screening Report and will provide further comments at the Regulation 19 stage when the amended policies will be assessed in-combination with the other Local Plan policies. | Comments noted. | No | No |
| 230 | _15/07 | Amy Kennedy | Natural England | GBI Strategy | - | - | - | General Comment | Pleased to note that the GBI Strategy and accompanying appendices have taken account of earlier advice, in particular in relation to the Nature Recovery Network, Local Nature Recovery Strategies, BNG and carbon sequestration by habitat. Also welcome the commitment to producing further guidance on BNG through an SPD. | Comments noted. | No | No |
| 231 | _016/ | Alexandra Gavin | P4 Planning | Part Two Development Management DPD | 9 | DM30a | 9.16 | General Comment | The additional costs of incorporating sustainable design features within new buildings must be viable and deliverable, this may prove challenging when repurposing previously developed land when development viability is only marginal. It is important that the Council acknowledges that any such delivery of a BREAAAM 'Very Good' scheme must also be viable. | Comments noted. | No | No |
| 232 | _017/01 | Richard Fordham | Sports England | GBI Strategy | - | - | - | General comment | Areas within GBI can provide the opportunity for 'pop up' sport events to take place, even if this is for ancillary facilities that support the main event e.g. portable buildings to take entries. The Strategy should acknowledge that temporary sporting events can take place in GBI and the Strategy should not prevent them from taking place. | Comments noted. Will incorporate 'pop up' sport events in uses of GBI. | No | Yes |
| 233 | _017/02 | Richard Fordham | Sports England | GBI Strategy | - | - | - | General comment | The Strategy should acknowledge water sports that take place within blue infrastructure and the Strategy should not prevent them from taking place. | Comments noted. Will incorporate water sports in uses of GBI. | No | Yes |

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| 234 | _017/03 | Richard Fordham | Sports England | GBI Strategy | - | - | - | Support | Welcomes the inclusion of the Playing Pitch Strategy within the GBI Strategy to help assess where improvements to the existing GBI network from a recreation perspective are needed. This will ensure that playing fields can be sustained in the long term, for example through pitch drainage. | Support noted | No | No |
| 235 | _017/04 | Richard Fordham | Sports England | GBI Strategy | - | - | - | Support | Welcomes the acknowledgement of informal sports taking place. Accidental typo 'van' needs amending. | Support noted. Will amend typo. | No | Yes |
| 236 | _017/05 | Richard Fordham | Sports England | GBI Strategy | - | - | - | General Comment | Objective 2 should also make reference to any deficiencies identified in the Playing Pitch Strategy. An additional objective should be included that recognises temporary sporting events that take place on land and water. | Comment noted. Will make reference to deficiencies identified through the Playing Pitch Strategy in Objective 2. Temporary sporting events may be more appropriately identified within the list of key issues. | No | Yes |
| 237 | _018/01 | David Dunlop | The Wildlife Trust | GBI Strategy | 5 | - | - | General comment | In Chapter 5 'coast' should be expanded to 'coast and coastal waters' | Comment noted. Agree change should be made to be clearer, to show that by coast we don't just mean the actual coastline. | No | Yes |
| 238 | _018/02 | David Dunlop | The Wildlife Trust | GBI Strategy | - | - | - | General comment | Three projects should be added into Appendix 4: 'Nature reserve network', 'Heysham nature education project' and 'The Bay: A Blueprint for Recovery' | Comments noted. Useful to be made aware of these projects. These will be added into Appendix 4 with further detail where possible. | No | Yes |
| 239 | _018/03 | David Dunlop | The Wildlife Trust | GBI Strategy | - | - | - | General Comment | Penultimate paragraph on page 11 might benefit from reference to 'bigger, better, more and more joined-up'. On page 24 it should be noted that the Environment Bill is expected to be paused again, likely not enacted until March 2022. On page 28 Heysham Peninsula is a particular area we would wish to develop a partnership project to enhance/extend the existing GBI network. Page 30 should refer to 'upland and lowland peat protection and restoration'. | Agree it would be beneficial to reference Lawtons review 'bigger, better, more joined up' to explain what a GBI Strategy is about. An update on the latest position with the Environment Bill will also be added. It will be more appropriate to explore the Heysham Peninsula as an 'Emerging Opportunity' or as part of Appendix 4 – the text box on page 28 sets out the current adopted wording of policy SC4. The text box on page 30 highlights the issues that were raised during the Scoping consultation. Peat to be explored further as part of next iteration of GBI Strategy. | No | Yes |
| 240 | _018/04 | David Dunlop | The Wildlife Trust | GBI Strategy | - | - | - | General Comment | Hoping the increased resource at Lancashire County Council and Natural England will mean the wetland ecological network can be mapped. But given the time that has elapsed, a review of all networks will be needed to inform Nature Recovery Network Strategy (page 63). | Comments noted. | No | No |
| 241 | _018/05 | David Dunlop | The Wildlife Trust | GBI Strategy | - | - | - | General Comment | Would like to see commitment to restoration of functional ecosystems and wetland and coast processes, as far as practicable (page 68), to restore this potential and to address peat soil losses to oxidation and windblow. Paludiculture and carbon-farming would seem more sustainable land uses on peat-soils e.g. see our Winmarleigh Moss carbon-farming pilot project on the extensively drained former Piling Moss. | Comments noted. Will look into case study and will be explored as part of the next iteration of the GBI Strategy. | No | Yes |
| 242 | _018/06 | David Dunlop | The Wildlife Trust | GBI Strategy | - | - | - | General Comment | Care will need to be taken to ensure planting of right tree in the right place, and identifying natural regeneration opportunities next to existing semi-natural woodlands (page 73). Mention saltmarsh carbon storage in paragraph 82. Also the health benefits of coastal access as a GBI ecosystem service. Refer to 'The Bay: A Blue Print for Recovery' project. | Comments noted. Saltmarsh data already included on interactive map. Will look into bay project and saltmarsh carbon storage will be explored as part of the next iteration of the GBI Strategy. | No | Yes |
| 243 | _018/07 | David Dunlop | The Wildlife Trust | GBI Strategy | - | - | - | General Comment | Restoration of functional flood plains (as far as practicable) would restore the natural flood-management ecosystem services that this can provide (page 82-83). Would require cross-boundary approaches. | Comment noted. Environment Agency are keen including natural flood management and improvement to water courses with naturalisation and the GBI Strategy promotes NFM. Are concerns around practicalities of restoring functional flood plains. | No | No |
| 244 | _018/08 | David Dunlop | The Wildlife Trust | GBI Strategy | - | - | - | Objection | Not true to say 'All green space absorbs CO2 from the atmosphere, thus reducing emissions and mitigating climate change' (page 91). Degraded upland and lowland peatlands and arable soils leak greenhouses gases into the atmosphere. Petland rewetting and mitigation, reversing coastal squeeze and environmentally sustainable farming and forestry practices would go some way to remedying this. | Comments noted. This will be explored as part of the next iteration of the GBI Strategy. | No | Yes |
| 245 | _018/09 | David Dunlop | The Wildlife Trust | GBI Strategy | - | - | - | General Comment | Clarification as to whether proposed Council habitat survey days is a reference to a public 'Bioblitz'. | Comments noted. Public Realm have started discussing this with some Friends Groups. This will be updated in the GBI Strategy. | No | Yes |
| 246 | _018/10 | David Dunlop | The Wildlife Trust | GBI Strategy | - | - | - | General Comment | Time will be of the essence in establishing a valid baseline from which to measure net gains in biodiversity (page 110). Severe lack in Lancashire of up-to-date condition data on BHS and even on SSSI, and many taxonomic groups and individual species. Mapping the ecological network will be key in ensuring the most efficient and effective approach to delivery of nature's recovery and help with achieving emerging opportunity to better consider ecological value that all green spaces could provide (page 111). | Agree. Comments noted. | No | No |
| 247 | _018/11 | David Dunlop | The Wildlife Trust | GBI Strategy | - | - | - | Objection | Would have concerns about exploration of marine net gain opportunities (page 111). Mitigation and compensation projects don't always provide like-for-like habitats/species populations/ecosystems. Our North West Wildlife Trusts Living Seas Team may also wish to engage. | Comments noted. Natural England suggested potential to explore marine net gain opportunities. Will ensure that when this happens North West Trusts Living Seas Team will be engaged. | No | Yes |
| 248 | _018/12 | David Dunlop | The Wildlife Trust | GBI Strategy | - | - | - | General Comment | Capacity concerns about being able to input into potential Lancaster District LNP Steering Group due to capacity constraints. | Comment noted. | No | No |
| 249 | _019/01 | Gemma Gaskell | Unities Utilities | Part Two Development Management DPD | 9 | DM30b | 9.16 | Support | Support the addition of Policy DM30b. | Support noted. | No | No |
| 250 | _019/02 | Gemma Gaskell | Unities Utilities | Part Two Development Management DPD | 9 | DM33 | 9.19 | Support | Support amended wording to Policy DM33. | Support noted. | No | No |
| 251 | _019/03 | Gemma Gaskell | Unities Utilities | Part Two Development Management DPD | 9 | DM34 | 9.30 | Support | Support amended wording to Policy DM34. | Support noted. | No | No |
| 252 | _019/04 | Gemma Gaskell | Unities Utilities | Part Two Development Management DPD | 9 | DM35 | 9.51 | Support | Support amended wording to Policy DM35. | Support noted. | No | No |
| 253 | _019/05 | Gemma Gaskell | Unities Utilities | Part Two Development Management DPD | 9 | DM36 | 9.57 | Support | Support amended wording to Policy DM36. | Support noted. | No | No |

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| 254 | _019/06 | Gemma Gaskell | Unities Utilities | Part Two Development Management DPD | 11 | DM43 | 11.2 | Support | Support amended wording to Policy DM43. | Support noted. | No | No |
| 255 | _019/07 | Gemma Gaskell | Unities Utilities | Part One Strategic Policies and Land Allocation DPD | - | - | - | General Comment | Whilst not part of the Local Plan Review UU highlight that the proposed allocations in the adopted Plan may have UU assets running through them, such as large water mains. In view of increasingly drier weather periods UU advise that it is important to prevent leaks and that this includes ensuring that new development does not cause damage to existing water pipes. Request that all UU assets are afforded due regard in the masterplanning process for a site. Advise that seep-rooted shrubs and trees should not be planted in the vicinity of public sewers and water mains. | Comments noted. | No | No |
| 256 | _020a/01/ | Laura Miller | WSP on behalf of Peel L&P | Part One Strategic Policies and Land Allocation DPD | - | - | - | Support | Peel is generally supportive of the amended policies in the Draft Part One: Climate Change review of Strategic Policies & Land Allocations Development Plan Document (July 2021) and Draft Part Two: Climate Change review of Development Management Development Plan Document (July 2021) and understands the importance of ensuring aspects that have arisen from the climate change emergency declaration are adequately considered in the Local Plan. Peel supports the need to reduce the impacts of climate change in the design of new development and ensuring that appropriate and achievable mitigation and adaption measures are adopted to address the climate emergency. | Support noted. | No | No |
| 257 | _020a/02 | Laura Miller | WSP on behalf of Peel | Part One Strategic Policies and Land Allocation DPD | - | - | - | Support | Peel agrees with the approach taken by Lancaster City Council (LCC) in undertaking the review and is supportive of the logic of reviewing only those sections relating to lessening the impacts of climate change rather than undertake a review of the entire Local Plan including development requirements, amount of development required and land allocations. Peel is keen to work with LCC and other stakeholders to secure the early delivery of much-needed new housing in the south of Lancaster in a logical and sustainable way and to help meet other social, environmental and economic objectives. | Support noted. | No | No |
| 258 | _020a/03 | Laura Miller | L&P | Part One Strategic Policies and Land Allocation DPD | - | - | - | General comment | Overall, whilst Peel supports the majority of policy changes set out in the draft plan (part one and part two), it is widely recognised that the extent to which developments can incorporate mitigation measures to tackle climate change ultimately will also depend on viability and the availability of suitable techniques and technologies. It is therefore crucial that the draft plans consider viability, as the scale of such measures and contributions set out in the draft policy alongside the existing adopted plans and other policy objectives could have an adverse impact on viability of schemes and consequently the delivery of much needed housing, investment, new facilities and infrastructure. That said, the importance of climate change is fully recognised. Overall, it is the Council's decision to identify which policies and objectives are of the greatest importance and balance potentially competing objectives or requirements. | Comments noted. | No | No |
| 259 | _020a/04 | Laura Miller | WSP on behalf of Peel | Part One Strategic Policies and Land Allocation DPD | 4 | SO2 | Spatial vision | Support | Peel endorses the Council's desire to provide a sufficient supply, quality and mix of housing to meet the changing needs of the population and support growth and investment. Sustainability, energy efficiency and water efficiency are at the heart of Peel's approach to design and housebuilding (as exemplified by its house building division), with energy demand, energy reduction and sustainability being key priorities. The additional wording to objective SO2 'provision of a sufficient supply, quality and mix of housing to meet the changing needs of the population and support growth and investment' is therefore considered appropriate. | Support noted. | No | No |
| 260 | _020a/05 | Laura Miller | L&P | Part One Strategic Policies and Land Allocation DPD | 4 | SO3 | Spatial vision | Support | Peel recognises the importance and opportunity that multi-functional green and blue infrastructure (here in referred to as GBI) brings with regards to the benefits of people and nature, whilst at the same time helping to mitigate and adapt to the impacts of climate change. Peel is aware that the Whinney Car site can potentially contribute significantly to recreation and accessibility through the delivery of a new robust multi-functional landscape framework for the site. Where possible, Peel will assist with the protection and enhancement of Lancaster's Green and Blue spaces and corridors to harness the multifunctional value and benefits in order to adapt and mitigate the impacts of climate change in accordance with objective SO3 'protect and enhance the natural, historic and built environment of the district'. | Support noted. | No | No |
| 261 | _020a/06 | Laura Miller | WSP on behalf of Peel | Part One Strategic Policies and Land Allocation DPD | 4 | SO5 | Spatial vision | support | Peel is supportive of the additional policy wording to objective SO5 'delivery of a safe and sustainable transport network that improves both connections within and out of the district, reducing the need to travel and encouraging more sustainable forms of transport'. Peel supports Page 3 sustainable transport initiatives in relation to addressing climate change and in offering high quality modal options and is committed to enhancing the existing walking and cycling network through new development opportunities to encourage sustainable modes of transport. | Support noted. | No | No |
| 262 | _020a/07 | Laura Miller | L&P | Part One Strategic Policies and Land Allocation DPD | 6 | CC1 | 6.5 | General comment | Overall, Peel is supportive of the new Policy CC1. As outlined above, Peel understands the need to reduce the impacts of climate change in the design of new development and ensure that appropriate mitigation and adaption measures are in place to address the climate emergency. As sustainability is a key priority for Peel (including Northstone (Peel's housebuilding company)) and subsequently there is a very strong focus on the principles of sustainable design and construction within its schemes. Ensuring that new development seeks to mitigate emissions and lessens the effects of climate change through incorporating measures which provide climate change adaptation and increased climate resilience is central to their thinking. Promoting sustainable modes of transport and improvements to the connectivity and multifunctionality of the Green and Blue network is endorsed by Peel and enhancements to the existing walking and cycling network are always factored into developments where possible. Whilst Peel does not object to the ambitions set out in Policy CC1 it is important that the Council consider development viability when assessing whether developments have incorporated climate mitigation and adaption measures into their schemes and other wider policy objectives. For example, whilst Peel endorses the use of recycled and low embodied energy materials within developments, the suitability of materials within developments should be determined on a sitespecific basis depending on viability, location, and design of the proposed scheme. Taking a fabric first approach to building sustainability is also critical in terms of finding the best and most appropriate site and scheme specific response to climate change, energy efficiency and sustainability objectives. | Comments noted. Viability assessment has been undertaken as part of the evidence base. | No | No |
| 263 | _020a/08 | Laura Miller | WSP on behalf of Peel | Part One Strategic Policies and Land Allocation DPD | 10 | SP8 | 10.4 | General comment | Peel recognises the importance of protecting the natural environment, including landscapes, species and habitats. Where possible, this will assist with the protection and enhancement of Lancaster's Green and Blue spaces, corridors and chains to harness the multifunctional value and benefits in order to adapt and mitigate the impacts of climate change. Separate representations have been made on the Green and Blue Infrastructure Strategy setting out Peel's comments and these should be read in conjunction with this representation. Peel supports the objectives of the Lancaster District Green and Blue Infrastructure Strategy. The proposed development of the Whinney Carr site, together with Biodiversity Net Gain (BNG) delivery, would work towards providing meaningful GBI through the site and connecting into the wider landscape, creating 'Bigger, better and more joined up' green spaces (Lawton's Principles, 2010). The Whinney Carr site offers GBI opportunities as the site is bounded to the west and south by s two green and blue infrastructure assets that are designated as Biological Heritage Sites (BHS) (the Lancaster Canal and Burrow Beck). These two linear features provide great connectivity and Page 4 crucially provide new opportunities for enhancing, | Comments noted | No | No |

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| | | | | | | | | | creating and connecting habitats of ecological value that can be actively managed for wildlife, and also to provide additional and new recreational semi-natural spaces to improve wellbeing. | | | |
| 264 | _020a/09 | Laura Miller | L&P | Part One Strategic Policies and Land Allocation DPD | 11 | SP9 | 11.1 | Support | Peel supports the additions to Policy SP9 given that it endorses the delivery of low-carbon, energy efficient homes. As outlined previously, they also support a modal shift in local travel patterns, encouraging sustainable transport modes and choices. | Support noted | No | No |
| 265 | _020a/10 | Laura Miller | WSP on behalf of Peel | Part One Strategic Policies and Land Allocation DPD | 23 | SC4 | 23.16 | General comment | Peel acknowledges new developments will be expected to contribute, where appropriate, to improving and enhancing multifunctionality and connectivity within Green and Blue networks, corridors and chains and should normally be protected from development which would cause inappropriate harm and damage to their value and integrity. As outlined above, separate representations have been made on the Green and Blue Infrastructure Strategy setting out Peel's comments which should be read alongside this document. | Comments noted | No | No |
| 266 | _020a/11 | Laura Miller | L&P | Part One Strategic Policies and Land Allocation DPD | 24 | T2 | 24.7 | General comment | Peel supports the additions to Policy T2 and agree with the promotion of sustainable modes of transport within developments. It is agreed that where possible and appropriate these routes should be segregated and designed to be inclusive to all users, however the Council should always consider the design of the routes on a site specific basis depending on the viability, location, topography and design of the proposed scheme. Peel also agrees with the concept of delivering a Cycle Superhighway to help mitigate the effects of climate change and where possible will assist with the delivery of this related infrastructure and incorporate it / links to it within and through its own development proposals in South Lancaster. This would help address both current issues and future growth aspirations in addition to encouraging a modal shift towards more sustainable modes of transport, as well as assist in reducing cyclists and associated accidents, by providing a safe and convenient alternative to cycling on the A6, an objective of the Green and Blue Infrastructure Strategy. Policy T2 refers to the use of off-site contributions and the need for these to be secured to ensure future growth is well connected to the network. Whilst Peel recognise the importance of ensuring future growth is well connected and support the delivery of key infrastructure, including the Cycle Superhighway, the scale of such measures and level of contribution required alongside other policy objectives could have an adverse impact on the viability of schemes and consequently on the delivery of much needed housing. Therefore, viability considerations are again relevant to this policy and should be taken into account. | Comments noted. Viability assessment has been undertaken as part of the evidence base. | No | No |
| 267 | _020a/12 | Laura Miller | WSP on behalf of Peel | Part One Strategic Policies and | 24 | T4 | 24.11 | General comment | Peel endorses the need for developments to be supported by high quality public transport linking them to Lancaster City Centre and/or other key destinations, such as other main urban centres and employment areas. In particular, Peel supports the delivery of a Better Buses scheme and the opportunities for a Rapid Reach Transit Service as it will help mitigate the effects of climate change Page 5 and where possible will assist with the delivery of this key infrastructure and fully incorporate it / links to it within and through its own development proposals in South Lancaster. Policy T4 outlines that where there are deficiencies in existing services, developers will be required to ensure the provision of such new services or enhanced existing services, as necessary, from first occupation of the development for a period of up to 10 years, or five years after last occupation, whichever comes sooner. Whilst Peel does not object to providing new services or enhancing existing services the timeframe for when this is delivered should be considered on a site-specific basis instead of a blanket approach for all developments, especially where the service might be commercially viable at an early stage. An element of flexibility should be applied to this policy in the context of the wider delivery, benefits, costs and scheme viability related to individual development schemes. Peel supports the additional policy justification wording which has been added to Policy T4 to ensure a reasonable, safe walking and cycling travel distances of 400m to public transport services from development sites is in place although again, an element of flexibility should be applied, and the travel distances are best assessed on a site specific basis. | The policy has been amended to address site specific matters. Viability assessment has been undertaken as part of the evidence base. | Yes | No |
| 268 | _020a/13 | Laura Miller | L&P | Part Two Development Management DPD | 9 | DM29 | 9.5 | General comment | Overall, Peel agrees with the additional general principles added to Policy DM29. Nevertheless, in relation to maximising solar gain and solar electric/thermal energy generation within developments a balanced approach needs to be taken when deciding whether dedicated larger scale renewable energy infrastructure should be provided on development sites. LCC should consider design, viability, sale and alternatives alongside the deliverability of development. It is important that the Development Plan policies reflect this to ensure the delivery of development is not unduly constrained and that much needed housing can still be brought forward and the other social, economic and environmental benefits that can arise from carefully planned, sustainable development are secured. Additionally, an appropriate balance needs to be struck between maximising solar gain in buildings on the one hand, and minimising summertime overheating risk on the other. In terms of accessibility and highway safety Peel endorses the principle that roads are designed to prioritise the safety of the most vulnerable road users and will seek to ensure this is in place within developments. As outlined previously within this letter, Peel also supports the principle of maximising opportunities for accessible travel, promoting sustainable modes of transport and improving accessible to walking and cycling routes. They are committed to promoting this principle through development opportunities. Peel recognises the importance and opportunity that multi-functional green and blue infrastructure brings with regards to the benefits provided to people and nature, whilst at the same time helping to mitigate and adapt to the impacts of climate change. | Comments noted. | No | No |
| 269 | _020a/14 | Laura Miller | | Part Two Development Management DPD | 9 | DM30a | 9.16 | General comment | Peel endorses the Council's desire to promote sustainable design and construction methods within new developments. Sustainability and energy efficiency are at the heart of Peel's approach to design with energy demand, energy reduction and sustainability being key priorities. Peel is supportive of the proposed wording of Policy DM30A 'Sustainable Design' and supports sustainable design and construction methods within developments. It is important however that the Council take into account the viability of development when considering this policy. The introduction of additional site-specific requirements could impact on viability and effect the Council's ability to meet its affordable and market housing targets as well as securing additional social, economic and environmental benefits that can arise from carefully planned, sustainable development. | Comments noted. Viability assessment has been undertaken as part of the evidence base. | No | No |
| 270 | _020a/15 | Laura Miller | | Part Two Development Management DPD | 9 | DM30b | 9.16 | General comment | Peel supports the Council's desire to ensure all new residential developments achieve, as a minimum, seek to achieve the optional requirement set through the Building Regulations G2: Water Efficiency or any future updates to the requirement. As outlined previously, Peel's key priority is sustainability, including improving water efficiency. Nevertheless, viability considerations are again relevant to this policy, especially in terms of the need to meet Building Regulations and should be taken into consideration in the context of the overall scheme and the Council's ability to meet its housing requirements. | Comments noted. Viability assessment has been undertaken as part of the evidence base. | No | No |
| 271 | _020a/16 | Laura Miller | | Part Two Development Management DPD | 9 | DM30c | 9.44 | General comment | Peel supports the principles of Policy DM30C but raise the same viability considerations as above. Peel's approach to development has sustainability at its heart. For example, Peel's house building company, Northstone's developments reuse and recycle waste material and soils on site where possible and support the requirement to submit a site waste management plan to support major development planning applications. Similarly, during the construction process they use local suppliers, use renewable and/or local | Comments noted. Viability assessment has been undertaken as part of the evidence base. | No | No |

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|---|-----------|----------------|---------------------------|-------------------------------------|---------|--------|-------|-----------------------------------|---|--|----------------|---------------------------------|
| | | | | | | | | | carbon materials and modern methods of construction where possible. The submission of a Sustainable Design Statement to support planning applications is supported. | | | |
| 272 | _020a/17 | Laura Miller | | Part Two Development Management DPD | 9 | DM33 | 9.19 | support | Peel is aware of the flooding risks and concerns that areas in South Lancaster experience and agrees that new development must ensure flood risk mitigation is properly considered and included where necessary, in addition to ensuring flood and drainage management is incorporated within schemes to prevent new flooding and ensure flooding in the local area is reduced. Peel also agrees with the sequential approach to direct development to areas at lowest risk of flooding, unless mitigation measures can effectively show those areas to be at a lower risk of flooding | Support noted | No | No |
| 273 | _020a/18 | Laura Miller | | Part Two Development Management DPD | 9 | DM34 | 9.30 | General comment | Peel recognises the need to provide sustainable drainage within new development to minimise water run-off and provide effective water management on-site via Sustainable Urban Drainage Systems (SuDS) and sets a supportive approach towards the delivery of SuDS. The need for SuDS and other types of sustainable drainage solutions should be established through flood risk and drainage technical work and assessments. Peel acknowledges the benefits of SuDS, especially in the context of climate change mitigation and would intend to incorporate SuDS as part of any development however, the precise and most appropriate nature of the mitigation required should only be decided once the relevant technical work has been carried out. Policy DM34 should therefore be re-worded on this basis. | DM34 sets out the principles for SuDS not the precise detail per scheme. | No | No |
| 274 | _020a/19 | Laura Miller | | Part Two Development Management DPD | 9 | DM36 | 9.57 | General comment | Whilst Peel does not object in principle to the inclusion multi-level source control within SuDS schemes to prevent ground and water pollution arising from water run-off, the need for SuDS and their specific technicalities should be established through flood risk and drainage technical work. In line with the comments for Policy DM34, Peel acknowledges the benefits of SuDS, especially in the context of climate change mitigation and would intend to incorporate SuDS as part of any development however, the precise nature of the mitigation required should only be decided once the relevant technical work has been carried out. Policy DM36 should be re-worded to reflect this process. | Multi-level source control is an integral part of SuDS it is therefore appropriate to include this as a requirements to address pollution control. | No | No |
| 275 | _020a/20 | Laura Miller | | Part Two Development Management DPD | 11 | DM43 | 11.2 | General comment | Peel recognises the importance and opportunity that multi-functional Green and Blue infrastructure brings with regards to the benefits provided to people and nature, whilst at the same time helping to mitigate and adapt to the impacts of climate change. Please refer to the detailed comments on the proposed Green and Blue Infrastructure Strategy in separate representations submitted by WSP on behalf of Peel. | Comments noted | No | No |
| 276 | _020a/21 | Laura Miller | | Part Two Development Management DPD | 11 | DM45 | 11.34 | General comment | Peel supports in principle the identification of opportunities which increase the resilience of woodlands, trees and hedgerows to climate change, pests and diseases and the requirement to make good use of indigenous species where appropriate. However, the precise nature of protecting existing and planting new trees, hedgerows and woodlands should be decided once the relevant design and technical work has been undertaken. Policy DM45 should reflect this process and opportunities to replace the unavoidable loss of some trees or hedgerows with new planting within development sites, providing landscape gains should be considered holistically within the policy. | Comments noted. Our position is presumption in favour of the retention and protection of existing trees. As set out in the policy where the existing trees and hedgerows cannot be positively incorporated into new development the onus is on the applicant to justify the loss of trees and hedgerows as part of their Arboricultural Impact Assessment. | Yes | No |
| 277 | _020a/22 | Laura Miller | | Part Two Development Management DPD | 14 | DM57 | 14.16 | support | Peel endorses the Council's desire to promote resilience to climate change through development, including adaption measures that provide resilience to extreme temperatures and rainfall and supports the addition of this wording in Policy DM57. As outlined previously, Peel understands the 8 need to seek to reduce the impacts of climate change in the design of new development and is aware of the importance of ensuring that appropriate mitigation and adaption measure are identified to help address the climate emergency. | Support noted | No | No |
| 278 | _020a/23 | Laura Miller | | Part Two Development Management DPD | 15 | DM59 | 15.21 | General comment | Peel does not object to the additional wording added to Policy DM59. For example, Peel's housing building company, already install fibre to the premises (FTTP) and appreciate the importance of delivery of high-speed connections. | Comment noted | No | No |
| 279 | _020a/24 | Laura Miller | | Part Two Development Management DPD | 16 | DM61 | 16.10 | support | Peel supports the requirement within Policy DM61 to ensure that the pedestrian environment is accessible to all including people living with disabilities, those with impaired mobility, and users of adaptive mobility aids. They also endorse the need to provide greater opportunities for cycle users, including improving the existing cycle network and are committed to promoting cycling networks through new development opportunities. | Support noted | No | No |
| 280 | _020a/25 | Laura Miller | | Part Two Development Management DPD | 16 | DM62 | 16.21 | General comment | Peel supports the addition of the policy wording in Policy DM62 in relation to Electric Vehicle (EV) Charging Points. For example, providing EV charging infrastructure as standard, to support the growth in EV car ownership and use of the provision of electric vehicle charging infrastructure in Policy DM62. Peel's housebuilding arm already installs EV fuse spurs on all of their properties and wherever practicable, ducts will be laid to accommodate a power supply to remote parking spaces. Peel appreciates the importance of this infrastructure. Peel also supports the addition of the policy wording in Policy DM62 in relation to cycle parking provision. For example, by providing sufficient space for residents to store bicycles at in a covered and secured space as Peel understands the importance of promoting sustainable modes of transport, including cycling. Notwithstanding, the policy should allow for some flexibility in the context of the wider benefits, costs and scheme viability related to individual development schemes when considering the provision of EV charging infrastructure and cycle parking provision. | Comments noted. Viability assessment has been undertaken as part of the evidence base. | No | No |
| 281 | _020b/01/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | Support | GBI Strategy is a welcomed document and tool to join up key themes. For this to be included on an interactive map is useful in terms of showing the extent of each theme and opportunity to inform future development. | Support noted. | No | No |
| 282 | _020b/02/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | General Comment | Promoter of land at Whinney Carr for residential development, seeks to demonstrate how proposed development will help to achieve objectives of GBI Strategy. Welcome acknowledgement in Strategy that recreation and accessible green spaces can function as multifunctional linked and biodiverse environments. KKP open space assessment provides useful baseline for enhancement and future provision. Benefits can be layered up e.g. potential tree and orchard planting, productive landscapes and habitat enhancements. Visual amenity and accessibility are also key considerations. Recognises importance of improvements to connectivity. On the map linked spaces such as the Lancaster Canal, whilst noted as green corridors could be more strongly highlighted. | Comments noted. Through policy SC4 a number of key green and blue corridors and chains have been identified, and this includes the Lancaster Canal. | No | No |
| 283 | _020b/03/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | General Comment | Development of Whinney Carr site together with biodiversity net gain principles would work to provide meaningful GBI through the site and connecting into wider landscape – 'bigger, better and more joined up' green spaces. Lancaster Canal and Burrow Beck identified via SC4 provide great connectivity and provide opportunities that currently do not exist, such as enhancement, creating and connecting habitats of ecological value to manage for wildlife, and also provide additional and new recreational semi-natural spaces to improve wellbeing. Would welcome additional mapping of GBI Strategy, as this tool evolves the more useful it will be to inform future proposals. Further work could be done to the legend and key. Legend does not show each layer and so | Comments noted. These features are all possible. The User Guide sets out all of the features which can be used on the map. | No | No |

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| | | | | | | | | | it can be difficult to read what it is intending to show. Map would be more user friendly if the user could hide/show selected layers within each theme. Finding out information about a site or polygon by clicking a selected layer would be useful. | | | |
| 284 | _020b/04/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | General Comment | Interactive map could go further and show other priority habitats, such as ponds and hedgerows. Opportunities not mapped include non-priority ponds that could be enhanced into priority ponds, where there is justification to do so. This could potentially feed into NE's GCN DLL scheme. NE Habitat Network mapping data is on the map and is useful for an overview, but the legend and key does not reflect what NE habitat network it is suggesting. An explanation what 'network enhancement zones' and 'network expansion zones' are would be useful. | Comments noted. Within the data sources list a definition/description of each dataset is provided. Will explore other mapping suggestions. | No | Yes |
| 285 | _020b/05/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | General Comment | As part of the HRA, knowledge of district mitigation schemes to remove any likely significant effect would be useful for areas that could be expanded on. It is also not clear where the identified recreation 'hotspots' are located. | Additional information on recreational pressure and potential hotspots for activity is contained in section 6 of the HRA for the Strategic Policies and Land Allocations DPD. Mitigation schemes are also contained in the HRA and in appendix D of the adopted Strategic Policies and Land Allocations DPD. | No | No |
| 286 | _020b/06/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | General Comment | Functionally Linked Land, especially for Pink-Footed Geese and Whopper Swan (plus other qualifying species) should be included in the mapping. Data is already accessible via LERN and GMEU have provided data to LCC as part of Local Plan evidence base. Would be a useful interactive mapping tool when assessing HRA. | Comments noted. We have considered mapping data relating to specific species, and asked Natural England which ones we should focus on, so as to not overwhelm the map with data, but we didn't receive a response. However, we are also mindful of the need to be careful with data related to qualifying species. | No | No |
| 287 | _020b/07/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | General Comment | A green space layer should be added onto the map identifying where parcels of allocated or designated land have been approved and agreed to allow 'stepping stones' between developments. Especially useful for BGV as will be made up of many phases and applications, and seeing how they will fit together to provide 'stepping stones' in the context of the wider area. | Designated green space is shown under 'recreation' layer. Through revised monitoring framework also looking to record and map new green spaces as they are created, so when such data becomes available it will be considered for the GBI mapping. | No | Yes |
| 288 | _020b/08/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | Support | Support idea of relieving pressures off Morecambe Bay and Duddon Estuary SPA. Providing attractive green space to residents of Whinney Carr will be a key design principle. | Support noted. | No | No |
| 289 | _020b/09/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | Support | Noted that the Strategy will review SC4 Green Space network, which includes Lancaster Canal and Burrow Beck within this site – providing opportunity to enhance as part of BNG. Intention is to provide significant buffers that will be managed for wildlife and manage flood risk. Green space will promote recreational activities close to the site and is expected to help take pressure off the nearby River Lune/Lune Estuary. Overall supportive of Green Space Network set out in GBI Strategy. | Support noted. | No | No |
| 290 | _020b/10/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | Support | Endorses strategy set out for priority habitats/species and great crested newts. GCN DLL scheme is a great opportunity. | Support noted. | No | No |
| 291 | _020b/11/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | Support | Acknowledges benefits of SuDS, especially in context of climate change mitigation and would intend to incorporate SuDS as part of any development. Will be designed to incorporate wildlife, link into GBI and onward to existing designated sites. Also provides further habitat for priority species. | Support noted. | No | No |
| 292 | _020b/12/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | Support | A metric will be applied to BNG assessment of Whinney Carr development so that where habitat mitigation and compensation is required, this will be connected to the existing GBI to make appropriate net gains. An ongoing development through the life of the project but will seek to inform early stages of layout design, development and future management of habitats. Will seek to deliver BNG onsite but may be offsets if more appropriately located offsite. Overall support BNG guidance in GBI Strategy. A local habitat bank, and also the Local Nature Recovery Network Strategy once understood, would be a welcome and useful interactive mapping tool to help decide how to achieve best outcome for BNG. | Support noted. As more detail on the Local Nature Recovery Strategy and local habitat banks associated with BNG emerge, where possible and appropriate, we will look to incorporate this where we can on the interactive map. | No | Yes |
| 293 | _020b/13/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | General Comment | Several themes relating specifically to landscape matters that require further thought and development. For example, landscape elements at differing scales e.g. individual trees to woodlands, landscape character to include district character as well as national character, landscape types/functions e.g. identification of agricultural landscapes, urban areas etc, time depth e.g. consideration of landscape history and historic landscape features, connectivity e.g. potential to join up existing and future landscape elements through greater analysis of collected data; and the visual context e.g. testing of the data collection in the field to identify visually connected landscapes. | Comments noted. It is recognised that landscape elements can be considered at different scales, and the accompanying GBI map aims to portray this within the 'Landscape' theme. It is recognised that the GBI document itself is more strategic in nature (due to covering the entire District) but the interactive map aims to drill down to more data, by for example displaying woodlands. The Council is exploring its approach to mapping individual trees. Consideration is also given to the historic landscape within the 'Historic Environment' theme. The GBI Strategy is intended to be used as a tool by Developers for analysis when designing their proposals. As set out in the emerging opportunities one thing we are going to look at in the future is highlighting on the map in a pop up the key landscape features within specific character types. | No | Yes |
| 294 | _020b/14/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | General Comment | Landscape comprises all 6 key themes, and more cross-referencing through the document would highlight this. E.g. Registered Parks and Gardens are in historic section, long distance routes in Active Travel and productive landscapes/allotments in recreation. | Comments noted. Many GBI assets cut across a number of the key themes and so the GBI Strategy recognises this and that it is not one theme for one asset. However, to avoid lots of repetition we chose to identify GBI assets under one main theme, whilst acknowledging that they overlap with other themes. So, we agree that those listed are key features within the landscape. | No | No |
| 295 | _020b/15/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | General Comment | National character areas provide useful context and overview but do not provide the level of fine grain analysis required at district level. | Comments noted. It was considered that we couldn't not include the national character areas, as they provide useful context, but agree they lack finer grain/local detail. Strategy has been carried out at a District-wide scale. Finer grain analysis more appropriate in a site by site basis. | No | No |
| 296 | _020b/16/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | General Comment | National Character Areas Ecosystem Services - This appears to be useful information in terms of targeting interventions that would improve for example soil quality and address climate emergency issues. It would be helpful to map this information where it may not be covered in data sets elsewhere particularly in terms of landscape types e.g. the extent of peat bogs. | Comments noted. We are exploring further what other available datasets we may be able to find. | No | Yes |
| 297 | _020b/17/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | General Comment | The key attributes of the two AONB's are noted but again this information is broad brush and would potentially benefit from detailed mapping of the key landscape elements, e.g. Limestone pavements. | Comments noted. We are exploring further what other available datasets we may be able to find. | No | Yes |
| 298 | _020b/18/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | General Comment | Having begun with National Character Areas the document jumps back briefly to a reference to the district landscape character types with little contextual analysis or explanation. The interactive mapping currently | Comments noted. We will look to add in further explanation as to why not all character types are shown. | No | Yes |

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| | | | | | | | | | appears to be incomplete in terms of this information with several character types missing and not referenced. | | | |
| 299 | _020b/19/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | General Comment | Local Landscape Designations - These indicate areas of higher landscape value and should be linked in hierarchy to the national designations. | Comments noted. We do not consider it appropriate at this point to set up a hierarchical system within the landscape data. | No | No |
| 300 | _020b/20/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | General Comment | It is noted that the Council aims to plant a million trees. Mapped target areas for tree planting would help to ensure benefits are maximised. Hedgerows are also an important part of the network of woodlands and trees connecting resources together and creating wildlife corridors. The ambition to map the tree canopy cover of the district would be enriched with the inclusion of hedgerows, particularly historic and important hedgerows. Other green blue landscape features should also be cross referenced in this section in addition to woodlands and trees such as, Green spines, (e.g. the whole of the canal corridor), Urban green spaces, Sub urban green spaces, community facilities, coastal zones, country parks, allotments, small holdings and orchards, SuDS and upland areas. This would bring the document more in line with the Landscape Institute's Position Statement - Green Infrastructure an integrated approach to land use, March 2013. | Comments noted. The Council is currently exploring its approach to trees and a District-wide Tree Strategy. Also looking into accessing hedgerow data. It is recognised that the topic of GBI is very cross-cutting, hence the thematic approach but at the same time the GBI Strategy is clear that GBI is an integrated approach to land use as it highlights the importance of multifunctionality. | No | Yes |
| 301 | _020b/21/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | General Comment | The mapping provided in terms of 'landscape' at Figure 11 is not layered and doesn't deal with multifunctionality, nor connectivity in terms of spaces, corridors and chains, nor quality, nor any kind of spatial hierarchy linking to adjacent authorities at this stage. It is currently a broad brush collection of some parts of the County Landscape Areas, the North Lancashire Green Belt, (not technically a landscape designation but not expanded on in the landscape text or other sections of the document either) and large areas of unkeyed cross-hatched areas. The whole of the district outside the urban areas, (or townscape areas) could technically be described and identified as 'landscape' therefore this section needs more refining to be of technical use. | Comments noted. Landscape is a broad topic. Figure 11 doesn't intend to show the detail of the data, the detail can be found in the interactive map. As part of the next iteration of the map we are looking to explore more specific landscape features. Consideration will also be given to how the Green Belt is presented in the document. | No | Yes |
| 302 | _020b/22/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | General Comment | Analysis of data once collated into, for example, primary, secondary and tertiary Green Blue Infrastructure networks would ensure that existing key strategic links are not compromised and opportunities are not missed to strengthen the network through development, such as at the Whinney Carr site and that focus is given to the most effective types of green blue infrastructure for any given site in the context of the district and the response to the declared climate emergency. For example, and not specifically related to the Whinney Carr site, but this could also focus future greening interventions such as the retrofitting of landscape features in urban environments and streetscapes in terms of offsite works. | Comments noted. We've identified strategic GBI corridors and chains which are identified through policy SC4, this is to ensure key strategic links are not compromised, and effectively are the backbone to the wider network. It is a District-wide network made up of corridors, chains and spaces. Given the time constraints associated with the CELPR it has not been possible to carry out a detailed landscape analysis, instead we aim to provide some of the tools required (where data is currently available) to do this on a site specific basis. The priority is the provision of onsite GBI, as opposed to offsite, but the Strategy does also considering urban greening, such as tree planting along streets, where appropriate. | No | No |
| 303 | _020b/23/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | Support | There are three key policies within the Green and Blue Infrastructure Strategy relating to water management. Policy DM33 sets out Lancaster City Council's approach to development and flood risk. This approach builds on the guidance on flood risk which is contained in the NPPF. This policy states that proposals must be supported by an appropriate site-specific Flood Risk Assessment (FRA). Peel are supportive of this. | Support noted. Policies are set out in the Development Management DPD. | No | No |
| 304 | _020b/24/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | Support | Local Plan Policy DM34 sets out the Council's approach to managing surface water and the requirements for positive approach towards sustainable drainage solutions. This states that surface water should be managed sustainably within new development. The Council expects that proposals for all new development will use SuDS in accordance with the Surface Water Drainage Hierarchy and that all new development should implement sustainable drainage systems, and that alternatives will only be permitted where it has been demonstrated to be inappropriate or impracticable. The policy states there are clear merits of green solutions to manage surface water, and in the benefits they provide to ecology, local habitat and biodiversity. Peel are supportive of this and the drainage strategy for the Whinney Carr proposal will seek to enhance areas alongside the Lancaster Canal and the Burrow Beck, which are classified as Biological Heritage Sites (BHS). Attenuation basins located along the Eastern edge of the site would provide further habitat for the communities of great crested newts. | Support noted. | No | No |
| 305 | _020b/25/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | Support | Policy DM36 sets out the Council's approach to protecting water resources and infrastructure. Peel are supportive of this and the embedded measures in the CEMP will ensure development will not have a detrimental impact on surface water and groundwater quantity and quality caused by surface water run-off into nearby waterways. | Support noted. | No | No |
| 306 | _020b/26/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | Support | Aware of flood risk concerns in South Lancaster and need for appropriate mitigation and management of water, preventing flooding and not making it worse elsewhere. Green and blue spaces can play a key role in offsetting these risks as well as being cost effective. Peel supports the principle that SuDS design needs to take place at the early stages of the design process. | Support noted. | No | No |
| 307 | _020b/27/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | Support | Supports the principle that developments should enhance water retention and slow the flow of water with above ground SuDS schemes. The Whinney Carr proposal will seek to provide SuDS in the form of attenuation basins, open swales with runoff discharged either directly to Burrow Beck Page 10 or to a connecting new or existing minor watercourse. Also, support the emerging opportunity of exploring the possibility of achieving biodiversity net gains through SuDS. | Support noted. | No | No |
| 308 | _020b/28/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | General comment | Supports the active travel objectives of the GBI Strategy and supports the statement that to accommodate the housing growth set out in the Local Plan, walking and cycling networks will need to be added to and improved if car borne traffic is to be kept to acceptable levels. Strategy notes a missing link between the city centre and Lancaster University. Supports the proposed Cycle Superhighway between the city centre and University. The Whinney Carr development will include safe traffic-free walking and cycling routes through the site, helping to connect the city centre with the University and Bailrigg Garden Village and with existing Active Travel routes where possible. This will help to reduce the very high level of cycling journeys made on the A6. However, the scale of such measures and level of contribution required alongside other policy objectives could have an adverse impact on the viability of schemes and consequently on the delivery of much needed housing. | Comment noted. A viability assessment will be undertaken to support the Area Action Plan and the associated infrastructure requirements. | No | No |
| 309 | _020b/29/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | General comment | The Active Travel layers are difficult to read on the GBI Strategy interactive map – could they be made thicker and use different colours for each of the layers. The interactive map could include potential 'future opportunities' for Active Travel, including potential off-road cycle and pedestrian links through the Bailrigg Garden Village as shown on JTP's masterplans. | Comments noted. Will explore proposed mapping amendment. We are looking to incorporate JTP's spatial masterplan as part of the AAP GBI Strategy mapping work. | Yes | Yes |
| 310 | _020b/30/ | Daniel Jackson | WSP on behalf of Peel L&P | GBI Strategy | - | - | - | Support | Supports the identification of Lancaster's rich heritage within the GBI Strategy and is aware that the Whinney Carr site sits within a historic landscape character (HLC) parcel identified as Ancient Enclosure. | Support noted. | No | No |
| 311 | _020c/01-30 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | - | - | - | Object | See Viability Assessment Responses at the end of this table. | See Viability Assessment Responses at the end of this table. | - | - |

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| 312 | _020c/31 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Community Infrastructur e Levy | - | - | 9.34 | General comment | A paragraph 9.34 determines that four CIL rates should be applied across the Lancaster district. Peel strongly supports the inclusion of a the nil CIL charge that is assessed for strategic sites. This charge is in line with many CIL charge assessments across the country, appropriately reflecting the higher infrastructure costs that will be incurred in the development of such sites. 2.111 A viability buffer of 50% is applied, and is regarded as appropriate, however, it is expected that, when adjustments are made to the viability assessment methodology in line with requests within this representation that the level of viability of schemes will reduce and it is important that the Council's CIL charging rates are based on fully evidenced, transparent and consistent evidence. | Comments noted. | No | No |
| 313 | _021a/1 | Sue Hunter | Arnside & Silverdale AONB | GBI Strategy | 5 | - | - | General comment | Specify ancient, veteran and notable trees as key assets which make an important contribution to landscape, biodiversity and historic environment. More information can be found at Woodland Trust. Hedgerows are also an important part of the rural environment, and make an important contribution to landscape, biodiversity and historic environment. Hedgerows also provide important habitat corridors through the landscape. | Comments noted. Will look to include in GBI Strategy. | No | Yes |
| 314 | _021a/2 | Sue Hunter | Arnside & Silverdale AONB | GBI Strategy | 7 | - | - | General comment | Ecological crisis should be highlighted, and Nature Recovery included as key issue/objective. It should be highlighted as a key issue that there is currently an ecological crisis, with significant declines in biodiversity across the country over recent decades. In addition, a great deal of information is provided about the ecological assets of the district but nature recovery is not properly reflected in the objectives. Consequently, nature recovery should form part of the objectives to demonstrate what contribution Lancaster City Council and partners within the district will make towards delivering a Nature Recovery Network – a national network of wildlife-rich places to increase and restore nature. For example, managing existing greenspaces, or designing new ones, with nature recovery as a key objective. | Comments noted. Will look to include greater emphasis upon nature recovery in GBI Strategy. | No | Yes |
| 315 | _021a/3 | Sue Hunter | Arnside & Silverdale AONB | GBI Strategy | 7 | - | - | General comment | As another key issue/objective – should include Ancient, veteran and notable trees, and hedgerows – the strategy should place emphasis on conserving them, and also securing succession and replacement planting. This is particularly important because of the issue of tree diseases especially Ash dieback which is now affecting the majority of ash trees in the district. | Comments noted. Will look to include greater emphasis on these assets in the GBI Strategy. Recognise Ash dieback is a significant issue in the District – the Council is looking into producing a Strategy to address the issue. | No | Yes |
| 316 | _021a/4 | Sue Hunter | Arnside & Silverdale AONB | GBI Strategy | Chapter 7/Appendix 4 | - | - | General comment | Numerous projects to be added to Appendix 4. Eg. Warton Crag and Trowbarrow LNR conservation management, Meadow Makers, Farming in Protected Landscapes, AONB Volunteer Programme | Comments noted. Will look to add these into Appendix 4 of the GBI Strategy. | No | Yes |
| 317 | 021a/5 | Sue Hunter | Arnside & Silverdale AONB | GBI Strategy | Interactive Map | - | - | General comment | Recommend National Trust land be updated/reviewed and shown in mapping. | Comments noted. Will look into updating National Trust mapping. | No | Yes |
| 318 | 021a/6 | Sue Hunter | Arnside and Silverdale AONB | GBI Strategy | - | - | - | General comment | Photographs on pages 23 and 66 taken in SLDC and not Lancaster district | Comments noted. Will change the photographs. | No | Yes |
| 319 | 021a/7 | Sue Hunter | Arnside and Silverdale AONB | GBI Strategy | Interactive map | - | - | General comment | Themes 1 to 6 - under each theme additions and amendments are suggested for the interactive map to reflect data/information held by the AONB team. Theme 1: Recreation & Accessible Greenspace KKP Open Space Coldwell Bank and Coldwell Meadows – Arnside & Silverdale AONB Landscape Trust, The Lotts - NE, and the Butterfly Conservation - Myers Allotment nature reserve should be added as these are open spaces. Theme 2: Ecology & Biodiversity Not all the AONB Nature Reserves have been included in the Theme 2 Nature Reserves maps: Lancashire Wildlife Trust - Warton Crag, Butterfly Conservation - Myers Allotment, Landscape Trust - Coldwell Parrock, Coldwell Bank and Coldwell Meadows and Lancashire Wildlife Nature Reserve at Warton Crag. Priority Habitat Inventory –The A&S AONB Priority Habitat (A&S AONB Priority Habitat Report, 2016) is being included in the Natural England PHI. NE will be updating by February 2022 and the Strategy map should therefore be updated after that. Theme 2: Opportunity Priority Habitat Inventory – Why is there only part of the AONB priority habitats included? Why not all of the priority habitat in the AONB for enhancement? Theme 3: Landscape Landscape Character Assessment – The A&S AONB Landscape and Seascape Character Assessment should be included in the map, alongside the Forest of Bowland Landscape Character Assessment. CRoW Act 2000: Access. Restrictions apply to Warton Marsh and this needs to be taken into account. Theme 4: Active Travel England Coast Path should be included when it is adopted. Theme 6: Historic Environment When the Local Heritage List is published, these features need to be added in the map | Comments noted. Will look into obtaining additional data recommended and making changes suggested to GBI interactive map. | No | Yes |
| 320 | 021a/8 | Sue Hunter | Arnside and Silverdale AONB | GBI Strategy | 5 | - | - | General comment | Page 49 – The Council-owned Warton Crag Local Nature Reserve could be given as an additional example of a Natural/Semi-natural greenspace. Ecology and Biodiversity Page 58 – Suggest amending title of section to: Priority Habitats and Species Page 58 - Should be 'Priority Habitat Inventory' not 'Index' Page 58 – Suggest amending wording relating to Arnside and Silverdale AONB so that it reads:down to the deciduous woodlands, species-rich limestone grasslands and wetlands within the Arnside and Silverdale AONB. Page 59 – AONBs not AONB's Page 59 – should be 'Morecambe Bay Limestone Pavements SAC' not 'Morecambe Bay Pavements SAC' Page 60 – suggest adding information about why Morecambe Bay Limestone Pavements SAC is special Page 61 – NIAs not NIA's Page 61 – The following paragraph doesn't quite make sense and needs clarifying what the focus is: These objectives align very closely with what this GBI Strategy seeks to achieve. However, in this case, the particular focus will not be around the Bay, but instead the four main urban areas within the District (Lancaster, Morecambe, Heysham and Carnforth), 'but instead cover the entire District. The Green & Blue Infrastructure Strategy should cover the rural areas of the district as well as the urban areas. Page 61 - On this page there is a great deal of emphasis on the NIA project. While mention of the NIA is welcomed, the NIA project itself ended in 2015 which is now over 6 years ago. While we agree it is helpful to mention the NIA, with some information about it, we do not think it necessary to place quite so much emphasis on it given the project came to an end in 2015. It states the information form the 2014 progress report and also says the 2015 progress report has not yet been uploaded. Please could this be removed and replaced with the following text: 'Over 1500ha of priority habitat was enhanced as a direct result of the work undertaken through the programme.' Page 62 – The information about LNPs is slightly incorrect. Cumbria and Lancashire LNPs are both county wide so there is a degree of overlap. Landscape Page 70 – should be limestone hills plural in the table Page 70 – the section would benefit from additional information about the AONB Partnerships and programmes of work – please contact us and we can provide some suitable text | Comments noted. Will look to address these suggestions through the next iteration of the GBI Strategy. | No | Yes |

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| | | | | | | | | | Page 71 – the specific Landscape Character Assessments for the two AONBs should be mentioned and explained and mapping also included. Please contact us for the relevant information. Seascapes could also be mentioned. Page 72 – need to add in Key Settlement Landscapes – as identified in the Arnsdale & Silverdale AONB Development Plan Document – these are specific to the A&S AONB but are important local landscape designations Page 74 – it is not clear what Map 11 shows – what are the hatched green areas? And the green areas – are these the local designations – however it doesn't seem to match up with the text. The strategy would benefit from this map being clearer. | | | |
| 321 | 021a/9 | Sue Hunter | Arnsdale and Silverdale AONB | GBI Strategy | 5 | - | - | General comment | Historic Environment Emerging Opportunities states 'Work closely with the Conservation Team and other key stakeholders to ensure the historic environment is thoughtfully recognised and carefully considered as part of the GBI network' This should include Local Heritage List Sites eg. Woodwell, within the AONB. | Comments noted. Will look into this as part of next iteration of GBI Strategy. | No | Yes |
| 322 | 021b/1 | Sue Hunter | Arnsdale and Silverdale AONB | Part One Strategic Policies and Land Allocations DPD | 23 | SC4 | 23.16 | General comment | Should include River Keer | Policy reads River Kerr and needs correcting | Yes | No |
| 323 | 021b/2 | Sue Hunter | Arnsdale and Silverdale AONB | Part Two Development Management DPD | 6 | DM21 | 6.28 | General comment | DM21: Advertisements and shopfronts states '(V) Not cause a visual intrusion by virtue of light pollution into adjoining residential properties or unnecessarily cause poorly directed light pollution elsewhere;' The impact of light pollution on climate change should also be included and explained. | Carbon emissions from light is included in Policy DM30a Sustainable Design and within the related Energy Statements to be submitted with applications. | No | No |
| 324 | 021b/3 | Sue Hunter | Arnsdale and Silverdale AONB | Part Two Development Management DPD | 7 | DM25 | 7.11 | General comment | DM25: The evening and night-time economy. The policy includes the following considerations 'II. That there will be no significant individual or cumulative affect on the surrounding character of the area and residential amenity;' and 'III. Arrangements for mitigating pollution including odour and noise, are provided in a way that minimises visual and environmental impact;'. It is important that light pollution is managed and included in this policy to minimise its impact upon the environment and reduce carbon emissions. Light pollution contributes to climate change by adding excess heat into the air. To create lighting takes electricity which contributes to increases of CO2 emissions leading to global warming and climate change. Reducing light pollution will contribute to the net zero. The contribution of light pollution into climate change and how this could be reduced should be considered. New developments should not be allowed to increase light pollution further. | Policy DM25 out of the scope of the review. The policy was not presented at scoping stage as a policy that the Council are looking at as part of the climate emergency review. Whilst LCC agree that the policy would benefit from the inclusion of the word 'light', changes to this policy can only be made as part of the Full review which will follow the CELPR. | No | No |
| 325 | 021b/4 | Sue Hunter | Arnsdale and Silverdale AONB | Part Two Development Management DPD | 9 | DM29 | 9.5 | General comment | Impacts of light pollution should be made clear and policy amended accordingly NPPF section 185 requires planning decisions to ensure that new development should '(c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation'. The All-Party Parliamentary Group (APPG) for Dark skies has produced 'Ten Dark Sky Policies for the Government' - https://appgdarksies.co.uk/policy-plan . The policy plan states 'Introduce new initiatives at every level of government which educate about the effects of light pollution as part of wider climate change awareness and create clear incentives for dark sky preservation.' and 'Place a duty on all public bodies and government departments to reduce light pollution year-on-year as part of their wider climate change emission reductions and health and well-being benefits.' We strongly recommend that information is provided in the Local Plan explaining that light pollution can be affecting climate change. Light pollution contributes to climate change and light pollution reduction would address this | Carbon emissions from light is included in Policy DM30a Sustainable Design and within the related Energy Statements to be submitted with applications. Add text to para 9.13 of Policy 29 Key Design Principals to explain impacts of light pollution on nocturnal ecology. The forthcoming Sustainable Design SPD will consider this in more detail. | Yes | No |
| 326 | 021b/5 | Sue Hunter | Arnsdale and Silverdale AONB | Part Two Development Management DPD | 12 | DM51 & 52 | 12.14 & 12.21 | General comment | DM51: Equine related development '(V). Their design, scale, siting, external lighting and use of materials should respect the rural setting, visual amenity and landscape'. The external lighting needs to respect the dark skies, nocturnal wildlife and minimise/reduce carbon emissions. This should be included within the policy and explanations in the texts. DM52: Holiday caravans, chalets, camping pods and log cabins should also include this. | The impacts of light pollution are explained within Policy DM30a and the amended Policy 29. (See 21/b/4) | No | No |
| 327 | 021b/6 | Sue Hunter | Arnsdale and Silverdale AONB | Part Two Development Management DPD | 13 | DM53 | 13.2 | General comment | In the Wind Energy Opportunity Area Map there are areas 'Suitable for Wind Energy' within the setting of the AONB. Wind turbines will have a negative impact on the landscape character of the setting of the AONB and the views out from the AONB. These developments could have a very significant impact on the setting of the AONB and on this map, areas 'Suitable for Wind Energy' in the setting of the AONB should be taken out. NPPF 176 states 'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues.... The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas'. | The areas of constraints have not changed from the adopted version, but the mapping is now presented in a more positive way. It is recognised that the policy needs to be explicit that the setting of AONBs needs to be taken into account it. The policy and supporting text are to be amended accordingly. | Yes | No |
| 328 | 021b/7 | Sue Hunter | Arnsdale and Silverdale AONB | Part Two Development Management DPD | 14 | DM57 | 14.16 | General comment | Policy DM57: Health and well-being. (V) should include light pollution: 'including adaptation measures that provide resilience to extremes in temperature, rainfall and light pollution'. | Comment noted. Not aware of adaptation to light pollution. Limiting light pollution is covered under other policies. | No | No |
| 329 | _022a/1 | Andrew Egerton | South Lancaster Flood Action Group | Part Two Development Management DPD | 9 | DM33 & DM34 | 9.19 & 9.30 | General comment | Welcome the improvements to the plan which provide a robust basis for measures to reduce flood risk but the policies do not meet the expectations set out by the climate emergency or community expectations. There is a missed opportunity to establish the districts ambition to reduce flood risk and there are further opportunities to strengthen aspects of the policies. It is disappointing the policies are not more ambitious in their requirements. | Comments noted | No | No |
| 330 | _022a/2 | Andrew Egerton | South Lancaster Flood Action Group | Part Two Development Management DPD | 9 | DM33 & DM34 | 9.19 & 9.30 | General comment | The Flood Risk & SuDS SPD is not available which makes it difficult to comment on the effectiveness of the policies. Multi Agency Flood Plan v3.2 does not exist publicly (policy reference??) | The policy must be effective within its confines. The SPD will provide guidance on the detail of the policy and will be drafted to accompany the policy once the detail has been finalised. The Multi Agency Flood Plan is available on the Council website: http://www.lancaster.gov.uk/environmental-health/emergency-planning/flooding-how-to-prepare-and-what-to-do-if-you-have-been-affected | No | No |
| 331 | _022a/3 | Andrew Egerton | South Lancaster Flood Action Group | Part Two Development Management DPD | 9 | DM33 | 9.19 | General comment | The opportunity is missed to apply some of the measures in the policy to sites that either sit within catchment of fluvial flood risk or that feed surface water flood risk where the impact of flood risk is outside of the development boundary. Sites contributing to flood risk should be added to paragraph 4. | The 4 th paragraph relates to sites in areas of flood risk not just sites that are at risk of flooding. The SFRA identifies high-risk urban catchments and bullet point III requires all applications in these areas to be accompanied by a FRA. | No | No |

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| 332 | _022a/4 | Andrew Egerton | South Lancaster Flood Action Group | Part Two Development Management DPD | 9 | DM33 | 9.19 | General comment | Point IV. should include the reference to the SPD | The SPD will not add further criteria. | No | No |
| 333 | _022a/5 | Andrew Egerton | South Lancaster Flood Action Group | Part Two Development Management DPD | 9 | DM33 | 9.19 | General comment | Point VI should require a reduction of run-off to Q-bar or below and/or increasing the capacity of flood storage by an equivalent amount. | Run-off is dealt with by policy DM34. | No | No |
| 334 | _022a/6 | Andrew Egerton | South Lancaster Flood Action Group | Part Two Development Management DPD | 9 | DM33 | 9.19 | General comment | Point VII should include a requirement to contain peak flows. | Comments noted and peak flows added to the policy. | Yes | No |
| 335 | _022a/7 | Andrew Egerton | South Lancaster Flood Action Group | Part Two Development Management DPD | 9 | DM33 | 9.19 | General comment | Point VIII should be amended to 'must'. | It is not always appropriate to include natural flood risk management and the impacts are difficult to quantify. | No | No |
| 336 | _022a/8 | Andrew Egerton | South Lancaster Flood Action Group | Part Two Development Management DPD | 9 | - | 9.20 | General comment | South Lancaster should be included in the list of flooding events in 2017. | Location added. | Yes | No |
| 337 | _022a/9 | Andrew Egerton | South Lancaster Flood Action Group | Part Two Development Management DPD | 9 | DM34 | 9.30 | General comment | ii. and iv. should include reference to ensuring run off is Q-bar or below. | The section sets out the hierarchy only, the run-off rates are dealt with later in the policy. | No | No |
| 338 | _022a/10 | Andrew Egerton | South Lancaster Flood Action Group | Part Two Development Management DPD | 9 | DM34 | 9.30 | General comment | Bullet point 6 should include, 'and manage peak flow'. | Comments noted and peak flows added to the policy. | Yes | No |
| 339 | _022a/11 | Andrew Egerton | South Lancaster Flood Action Group | Part Two Development Management DPD | 9 | DM34 | 9.30 | General comment | The policy should require adoption arrangements with a public authority or statutory undertaker, an example at Ashford mentioned. | Provided management and maintenance is ensured, the LPA is not in a position to require adoption. The Ashford Plan refers to adoption arrangements where applicable but does not require them. | No | No |
| 340 | _022a/12 | Andrew Egerton | South Lancaster Flood Action Group | Part Two Development Management DPD | 9 | DM34 | 9.30 | General comment | Paragraph 6 states run-off should be reduced but the bullet points do not require reduction, the policy should require a rate of Qbar or below. Qbar is already referred to in the PAN. | The requirements referred are based upon the Non-statutory technical standards for sustainable drainage systems in accordance with EA and LLFA recommendations. | No | No |
| 341 | _022a/13 | Andrew Egerton | South Lancaster Flood Action Group | Part Two Development Management DPD | 9 | DM34 | 9.30 | General comment | The policy should include ambitious targets for run-off reduction. | Setting specific targets has the potential to affect the deliverability of sites. Reassessing allocations and housing numbers is not within the scope of the review so therefore it is not appropriate to set a specific target for all sites. | No | No |
| 342 | _022a/14 | Andrew Egerton | South Lancaster Flood Action Group | Part Two Development Management DPD | 9 | DM34 | 9.30 | General comment | The Management and Maintenance plan should include reference to funding arrangements within the policy and at paragraph 9.48. | Policy amended to include reference to funding. Paragraph 9.48 refers to the requirements for the management and maintenance strategy and includes reference to funding | Yes | No |
| 343 | _022b/1 | Andrew Egerton | South Lancaster Flood Action Group | Community Infrastructure Levy | - | - | - | Support | Support for CIL and use for small scale community led projects, especially green and blue projects such as implementation of Natural Flood Risk Management. | The comments will be given due consideration as the City Council considers the scope and role of CIL within the district. | No | No |
| 344 | _022b/2 | Andrew Egerton | South Lancaster Flood Action Group | Community Infrastructure Levy | - | - | - | General comment | Non-residential development should be rated £100, the lower residential rate increase to £50 and strategic sites should be included to maximise revenue while promoting development. No areas should be exempt. | The rates are based upon the viability margins supported by evidence within the viability assessment. The comments will be given due consideration as the City Council considers the scope and role of CIL within the district. | No | No |
| 345 | _022c/1 | Andrew Egerton | South Lancaster Flood Action Group | GBI Strategy | - | - | - | General comment | Smaller local assets such as ponds and ephemeral streams should also be captured, and the County Councils flood risk asset register should be added to the map. | Comment noted. Will explore whether we are able to access these datasets. | No | Yes |
| 346 | _022c/2 | Andrew Egerton | South Lancaster Flood Action Group | GBI Strategy | - | - | - | General comment | There should be a register/mapping of SuDS schemes to allow audit maintenance. | Mapping would be a positive step however the resources required would be significant, is not a statutory function and would be at the discretion of the LLFA. | No | No |
| 347 | _022c/3 | Andrew Egerton | South Lancaster Flood Action Group | GBI Strategy | - | - | - | General comment | A key issue is the complexity that exists within water management with different agencies having different responsibilities and different organisations/individuals having riparian responsibilities - this means that delivering any activities/projects is inherently difficult. There is no established mechanism for grass roots ideas to be matured into projects, what is specifically missing is access to experts to design solutions and initial funding to mature these ideas to a deliverable state Access to funding to deliver projects - funding is available from various grants etc but it takes time to find suitable sources of funding and put bids together. | Comments noted. Will look to identify as an issue in the GBI Strategy. | No | Yes |

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| | | | | | | | | | Risk Management Agencies e.g. EA/LLFA have laborious requirements to endlessly assess and model concepts before progressing to delivery this can take years and even then funding may not be available. Delivery of NFM can be low cost compared to traditional engineered solutions however there is no access to funding from statutory agencies to deliver these small scale projects Water Management. | | | |
| 348 | _022c/4 | Andrew Egerton | South Lancaster Flood Action Group | GBI Strategy | - | - | - | General comment | The objective to ensure development contributes towards reducing the risk of flooding is not reflected on planning policy DM33 and DM34. There ought to be an objective on engaging the flood risk and local community in water management. Often local knowledge can unlock solutions for water management which may be overlooked by modelling exercises. NFM interventions may well be deliverable though mobilisation of local community volunteers | Comment noted. Will be picked up with the above point. | No | No |
| 349 | _022c/5 | Andrew Egerton | South Lancaster Flood Action Group | GBI Strategy | - | - | - | General comment | Water Management Opportunities: There is no one agency/group that has a coordinating role. The closest is the Making Space for Water forum but that is not accessible. There is opportunity for an annual symposium to bring together all agencies and communities to integrate, generate ideas, and progress plans. | Comment noted. GBI Strategy in very early days as a new document, will see how things progress and review. | No | Yes |
| 350 | _022c/6 | Andrew Egerton | South Lancaster Flood Action Group | GBI Strategy | - | - | - | General comment | We are looking to pursue the following two projects in the next 12 months: 1. Installation of leaky dams at https://w3w.co/wanted.appoints.botanists 2. Various measures to hold and slow water in the area of https://w3w.co/vows.pursue . Additionally there may be further projects that come forward in the The Chain of Open Spaces-Burrow Beck Valley covered by SC4 of the local plan and wider in the Burrow Beck catchment. | Comments noted. Will look into these further. | No | Yes |
| 351 | _023a/01 | Philip Withnall | - | Part One Strategic Policies and Land Allocation DPD | 11 | SP9 | 11.1 | General comment | I think the document should push modal shift more strongly than saying “new development should ... support a modal shift”. A lot of car-centric new developments could be argued to ‘support’ a modal shift because they have pavements. The document could instead require new developments to positively contribute to modal shift, for example. | The Council considers that modal shift is adequately considered within the CELPR. The introduction of LTN1/20 in particular is a significant amendment. | No | No |
| 352 | _023a/02 | Philip Withnall | - | Part One Strategic Policies and Land Allocation DPD | - | - | - | General comment | The document references ‘low carbon housing’ in several places. This is good, but it might be worthwhile clarifying that housing should be low carbon *over its entire lifecycle*. Otherwise developers could continue to build houses with high embodied carbon with a few solar panels on the roof to make them count as low carbon. The emissions of construction need to be reduced just as the emissions during use of a building need to be reduced | Comments noted. The full lifecycle of the building is now included in DM30c. | Yes | No |
| 353 | _023a/03 | Philip Withnall | - | Part One Strategic Policies and Land Allocation DPD | - | - | - | General comment | It might be worthwhile stipulating that infrastructure should be low lifecycle carbon too, as well as buildings. Apologies if this is already stated somewhere in the document; I’ve only been able to skim it. | Comments noted. Lifecycle considerations are now included in policy DM30c which applies to all new development inclusive of infrastructure. | Yes | No |
| 354 | _023a/04 | Philip Withnall | - | Part One Strategic Policies and Land Allocation DPD | - | - | - | Support | The DPD and its update for the climate crisis seems good overall to me, in the areas which I feel qualified to comment on. Thanks very much for taking the opportunity to update it; I’m looking forward to the updates for the other DPDs. | Support noted. | No | No |
| 355 | _023a/05 | Philip Withnall | - | Part Two Development Management DPD | 9 | DM30a | 9.16 | Support/General comment | I think the rewrite of DM30a is fantastic. The use of a fabric-first approach, supported by testing during and post-construction, with phased targets which exceed Building Regs requirements is great. The explicit mention of BREEAM and Passivhaus standards as alternate routes to acceptance is fantastic. The requirement for the Energy Assessment to consider whole lifecycle emissions is great. Two small suggestions: 1. For conversion of existing buildings (which is a great route to reducing embodied carbon compared to new build), it might be worthwhile listing Enerphit certification as an alternate route to acceptance, just as Passivhaus certification is an alternate route to acceptance for new build. 2. It might be worthwhile to include a point about designing for deconstruction where possible, so that materials can be more effectively reclaimed when a building reaches the end of its life. As I understand it, there are currently fewer standards and recommendations available for how to achieve this, but it could allow developers to be pushed in the right direction once such guidance is available. Designing for deconstruction would allow more of the embodied carbon in a building to be reclaimed at the end of life, rather than turning the whole lot into a pile of hardcore. Thanks again! | Support and comments noted. Changes made within DM30a and DM30c. | Yes | No |
| 356 | _023b/1 | Philip Withnall | - | Part Two Development Management DPD | 9 | DM30a | 9.38 | General comment | There’s a typo ‘PassivHaus’ rather than ‘Passivhaus’ in the heading for paragraph 9.38. | Amend typo. | Yes | No |
| 357 | -023b/2 | Philip Withnall | - | Part Two Development Management DPD | 9 | DM30a | 9.16 | General comment | The UK Green Building Council has just opened a consultation on their Whole Life Carbon Roadmap, and the proposed document includes a number of policy recommendations for local authorities. https://www.ukgbc.org/news/ukgbc-consults-on-net-zero-whole-life-carbon-roadmap/ If you haven’t done so already, you may want to scan through it (particularly section 8.1.2 / page 46) and consider aligning the relevant DPD policies with it. It is still a draft, so may change after their consultation closes on 15th August 2021. From a quick scan through (I have not compared them in detail), the UKGBC document contains several points about limiting the peak energy demand from properties which I don’t think the DPDs cover. | Comments noted. Document has been considered. | No | No |
| 358 | _024a/01/ | Geoff Littlewood | - | Community Infrastructure Levy | - | - | - | Supporting | Priorities should be for the provision of walking and cycling routes to facilities and more easily accessible recreation space. NO areas should be excluded from the Levy. | The comments will be given due consideration as the City Council considers the scope and role of CIL within the district. | No | No |
| 359 | _024b/01 | Geoffrey Littlewood | - | Part One Strategic Policies and | 6 | CC1 | 6.5 | General Comment | My comments are about 'Sustainability', references to which appear throughout the draft documents. I would support a stronger and more detailed emphasis on the sustainability of communities and developments. I think that a key element of this is the localisation of amenities. In this I include active travel possibilities such as leisure areas and cycling opportunities. This means providing extended green areas (not just paths, wherever that is possible), making footpaths safer, and having cycle ways that are safe and | GBI Strategy covers these considerations in detail, as well as proposed new policies in the CELPR. Also, we work closely with those neighbouring LPAs to ensure we take account of what is taking place outside the District. | No | No |

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| | | | | Land Allocation DPD | | | | | continuous. It is widely accepted that such amenities are vital for mental and physical well-being. I am not a dog owner but I would make a specific suggestion that those who are, and who get significant health benefits from it, are given some consideration in these matters. The local availability of jobs, shops, leisure outlets, schools and health facilities should also be a major criterion in determining sustainability. Can the Council do anything to encourage the provision of these where, as in most cases, they will inevitably be private initiatives? Clearly, objective measures are needed to establish some (preferably quantitatively) the level of sustainability of each community. These would need to be rigorously applied and the assessments reviewed regularly. The is a need for 'hubs' for major services and this is mentioned in the documents. I would propose that the sustainability of a community should specifically incorporate an assessment of the ease and 'greenness' of its access to the hubs. I would also take into account the availability of hubs just outside the Council's borders. Finally, I recognise that new housing will be subject to much greener standards than has been the case. but I hope that the Council would have some fairly-active role in advising on and promoting the 'greening' of older houses and I would like to see this emphasised and fleshed-out as far as sensible at this stage. The immediacy of the need for action is evident and is becoming ever clearer. I hope that the Council has the joint will and the resources to progress urgently beyond this review into implementations of what is agreed to be necessary. | | | |
| 360 | _025a/ | John Pratt | - | Community Infrastructure Levy | - | - | - | Supporting | I suggest that to target the climate emergency the district-wide priorities should be:- Retrofitting existing housing stock (including support for training) and including development of renewal energy provision; Reducing car use by substantially :- increasing public transport provision; further developing 'active travel' provision. and encouraging use of electric transport; Creating a campaign to reduce food waste and backing it with Council services (e.g. reintroducing waste-food caddies). I have listed these in priority order which, as I understand, corresponds to the order of current carbon footprints generated by the general public. I'm sure there's nothing new in this - but I take this opportunity to emphasise that actions must be directed to the areas realistically capable of having maximum impact. You will gather that I consider that you should introduce a CIL - all possibilities of accelerating action to tackle climate change should be welcomed! As to the rates for charging, I can only assume that your consultants have homed in on a sensible charging structure | CIL must be used to fund strategic infrastructure projects. Energy and sustainable transport are suitable candidates for CIL but retrofitting, campaigns and food caddies would not constitute infrastructure. The comments will be given due consideration as the City Council considers the scope and role of CIL within the district. | No | No |
| 361 | _025b/ | John Pratt | - | GBI | - | - | - | Supporting | Impressed with scope and detail of GBI Strategy. Ensuring it happens with max benefit for people and for impacting on climate change will be key. Costs involved will be a key factor. Questions how costs will be assessed and whether the basis of this assessment can be selected/developed to ensure work towards aims of Strategy. Should calculator be weighted to give greater emphasis on future benefits and opportunity costs. 'Future weighting' could also be helpful in negotiations with developers towards insisting in including such features. | Support noted. The GBI Strategy primarily promotes the delivery of GBI onsite as an integral part of a development proposal and highlights multifunctional value of GBI No specific GBI standards have been set. The GBI toolkit aims to encourage the delivery of multiple benefits. GBI very difficult to measure/calculate. Biodiversity net gain metric has just emerged to help quantify gains in biodiversity. Have standards in place for the delivery of open space. | No | No |
| 362 | _026a/1 | Charles Ainger | - | Part Two Development Management DPD | - | - | - | Supporting | Strongly supports and provides suggestions to strengthen the DPD polices | Comments noted | No | No |
| 363 | 026a/2 | Charles Ainger | - | DM DPD | 4 | DM1 | 4.6 | General comment | Suggested text to emphasise use of GBI and changes to traditional suburban layouts | Comments noted Policy DM1 is not within the scope of the CELPR. | No | No |
| 364 | 026a/3 | Charles Ainger | - | DM DPD | 4 | DM3 | 4.24 | General comment | Suggested text that states that meeting CELPR requirements should not be seen as abnormal costs re viability | Comments noted. The text should not be categoric as the as inputs to the viability assessment may be site specific. | No | No |
| 365 | _026a/4 | Charles Ainger | - | DM DPD | 5 | DM15 | 5.15 | General comment | Suggested text to support green economy | Comment noted. Agreed that the following text be added to paragraph 5.15 of the DM DPD '... <i>Policy DM15 will seek to encourage the sustainable growth of new businesses and emerging economic sectors – particularly the opportunities in the green economy and created by implementing the council's climate emergency policies in both urban and rural locations.</i> | Yes | No |
| 366 | _026a/5 | Charles Ainger | - | DM DPD | 6 | DM16 | 6.3 | General comment | Suggested text to support conversion to housing | Comments noted. Agree that appropriate housing should be supported in town centre locations but consider the existing policy framework adequately deals with this matter. | No | No |
| 367 | 026a/6 | Charles Ainger | - | DM DPD | 7 | DM26 | 7.17 | General comment | Suggested text to support green spaces and trees | Comments noted. Policy DM26 not within the scope of this review. Greater reference to importance of GBI emphasised through review of other policies within the plan. | No | No |
| 368 | 026a/7 | Charles Ainger | - | DM DPD | 8 | DM28 | 8.1 | General comment | Suggested text to support skills/training in green economy | Comments noted. Expanding the scope of Employment and Skills Plans into skills / training for green construction techniques will be considered through any future review of the Supplementary Planning Document. | No | No |
| 369 | 026a/8 | Charles Ainger | - | DM DPD | 9 | - | - | General comment | The Chapter should be strengthened to emphasise need for change re: site layouts and design | Comments noted. Reference to layout has been added to DM29 bullet point II. Whilst not specifically referring to site layout and design, the policy requirements will influence layout and design. Additional paragraph added to supporting text. | Yes | No |
| 370 | 026a/9 | Charles Ainger | - | DM DPD | 9 | DM30a | 9.16 | General comment | Suggests going to net zero immediately rather than stepped approach or at very least developers examine option of net zero. Rep includes background information on Passivhaus. | Comments noted This would involve a significant change to the policy approach and the supporting evidence. The stepped approach also ensures some degree of initial consistency with the proposed changes to building regs and gives developers some time to adapt layouts and design. The phasing is also support by the viability evidence. | No | No |
| 371 | 026a/10 | Charles Ainger | - | DM DPD | 9 | DM30c | 9.44 | General comment | Add the requirement that, as a Planning Condition once detailed design is done, all developments calculate the 'embodied CO2' in their materials and construction process. This will allow LCC to properly monitor progress of emissions reduction against their regional carbon budget | Comment noted The Energy Statement required by policy DM30a includes an assessment of Whole Life Carbon (para 3.36). | No | No |

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| 372 | 026a/11 | Charles Ainger | - | DM DPD | 9 | DM34 | 9.30 | General comment | Wording should be strengthened to reflect surface water risks identified in the SFRA's | Comments noted FRAs and SuDS consider/address all sources of flood risk and SuDS design includes for exceedance flows. | No | No |
| 373 | _026a/12 | Charles Ainger | | DM DPD | 10 | DMCCH1 | 10.60 | General comment | Suggested text:- 'Where insulation measures for retrofit are very expensive or too intrusive, it will be best to start with a different heating process; for instance, heating only the occupants via radiant heating, rather than all the internal air.' | Comments noted. The acceptability of heat sources will depend on the significance. Such heating may not be always appropriate and will be considered on a case by case basis. | No | No |
| 374 | 026a/13 | Charles Ainger | - | DM DPD | 13 | DM53 | 13.2 | General comment | Add a requirement that it will be a default assumption that all roofs, residential, commercial/industrial and agricultural, should have solar PV panels mounted on them; unless there is a sufficiently over-riding planning requirement that prevents this. | Comment noted Policy DM30a sets the energy efficiency/renewable requirements for new buildings in the form of carbon reduction. PV will be required in some cases to meet those carbon reduction requirements but requiring all new buildings to incorporate PV in addition to those carbon reduction requirements would have viability implications. Policy DM53 supports standalone renewables and proposals for existing buildings. The policy is worded positively to support renewables unless there are other issues. | No | No |
| 375 | _026a/14 | Charles Ainger | - | DM DPD | 14 | DM57 | 14.22 | General comment | See comments under 'Active Travel;' in my response on the Green Blue Infrastructure Strategy. This 14.22 para needs specific cross reference to how the modal shift, to less car use, will be driven by transport policy, and car parking and car access design in development layouts. This will require a reduction in the standard car parking space requirements in Appendix E. | Comment noted. Changes to Appendix E have been made to encourage car free developments. Modal shift and how it can be achieved will be considered further within the LSAAP. | No | No |
| 376 | 026a/15 | Charles Ainger | - | DM DPD | 15 | DM59 | 15.21 | General comment | The policy should refer to and support the steady work of B4RN [Broadband for the Rural North] in the region, in delivering this objectives. | Comment noted | No | No |
| 377 | 026a/16 | Charles Ainger | - | DM DPD | 16 | DM62 | 16.21 | General comment | Your policy for modal shift in transport will fail, for new developments, unless you put in place car parking and car use restrictions for new developments. You must reduce the old Appendix E car park space requirements. See my separate comments, on Green Blue Infrastructure Strategy, and the Background Narrative'. An example of the reduction in car parking provision, and a radical Travel Plan for walking, cycling and car sharing, is provided by the Lancaster Cohousing, Halton, planning condition. | Comment noted. Significant change is proposed and is considered to be beyond the scope of this review. Improvements to policies relating to modal shift are being considered in the Lancaster South AAP. | No | No |
| 378 | _026b/01 | Charles Ainger | - | GBI Strategy | 5 | - | - | General Comment | In Chapter 5 should highlight Fairfield Nature Reserve and the green spaces within existing developed housing sites like those in Case Studies 1 and 2. | Comment noted. Fairfield Nature Reserve is identified as an open space within the Recreation theme, as are known mapped green spaces within existing developed housing sites. Will highlight this better in the GBI Strategy. | No | Yes |
| 379 | _026b/02 | Charles Ainger | - | GBI Strategy | - | - | - | Supporting | Support and reinforce your strategy statement which includes: 'We want green and blue spaces to shape the form of development, and be an integral part of the design process, instead of being an afterthought based upon what space is left'. | Support noted. | No | No |
| 380 | _026b/03 | Charles Ainger | - | GBI Strategy | - | - | - | General Comment | Recreation, emerging opportunity – change wording to require Developer to work with or create a community group for that new green space. Make it 1 st choice for the community to run it, rather than them having to battle the developer to take over from a private contractor hired by Developer. Lune Valley CLT has been unsuccessful in getting Story Homes to consider us taking over running the large open space in their Halton development. | Comment noted. We aren't able to require a developer to do this only encourage. We can ensure that there is a suitable mechanism for management/maintenance but can't insist on a certain format. | No | No |
| 381 | _026b/04 | Charles Ainger | - | GBI Strategy | - | - | - | General Comment | Ecology, key issues – add community green areas within housing development sites into statement 'highlight ecological value of other green and blue spaces...' | Comment noted. Will add 'community green areas within housing development sites' into the list. | No | Yes |
| 382 | _026b/05 | Charles Ainger | - | GBI Strategy | - | - | - | General Comment | Landscape, emerging opportunity – add 'using trees within community green areas within housing development sites' to 'seek opportunities for urban greening...' | Comment noted. Will add 'community green areas within housing development sites' into the list. | No | Yes |
| 383 | _026b/06 | Charles Ainger | - | GBI Strategy | - | - | - | General Comment | Active Travel, Key Issues – add 'how to integrate active travel, including cycling and walking, into every new development; and how to drive this by requiring site layouts that design in less parking (need to amend Appendix E), and more bike storage, with clear safe walking routes, and locally accessible public transport, for each site. This is also key planning tool for driving the transport 'modal shift' away from cars'. | Comment noted. Would apply to all themes and is ultimately what GBI Strategy seeks to do in informing policy. Agree integrating practical and safe walking and cycling routes into new development is key and would help to facilitate modal shift. The design of car parking and Appendix E, however, are considered beyond the scope of the GBI Strategy. It should be noted that changes to Policies DM60 and DM61 strengthens the need for walking/cycling connectivity within sites. This is supported by PAN08 and the emerging AAP for South Lancaster. | No | No |
| 384 | _026b/07 | Charles Ainger | - | GBI Strategy | - | - | - | General Comment | Active Travel, Emerging Opportunities – add 'clarify how maximising active travel drivers in all new development would reduce traffic generated, and reduce the need for new external road infrastructure' | Comment noted. This point links to first bullet point in the emerging opportunities list 'improve connections to existing cycle routes from key nodes/points of access'. As better connected cycling corridors will encourage more people to use them instead of private cars. | No | No |
| 385 | _026b/08 | Charles Ainger | - | GBI Strategy | - | - | - | General Comment | Water Management, Key Issues – add 'We note that about ¼ of the potential housing development sites, which were categorised as flooding zone 1 sites in the JBA Flood Risk Strategy, nevertheless had an identified 'surface water flood risk', in spite of being Zone 1 in relation to fluvial/coastal flooding. So this issue will affect most development sites; and must be designed for, in the first assessment of layout and number of homes' to 'benefits of above surface water...' | FRAs and SuDS consider/address all sources of flood risk and SuDS design includes for exceedance flows. | No | No |
| 386 | _026b/09 | Charles Ainger | - | GBI Strategy | - | - | - | General Comment | In section 'Embedding GBI into the Local Plan Review' one of key drivers to provide GBI will be requirement for 10% BNG. But unless they change amount of space their current layout designs allocate to cars, it will be difficult to meet this requirement on site, and they will likely mainly resort to offsets. Can also be part of driver for modal shift away from cars. | Comment noted. As set out in the Delivery section of the GBI Strategy, the mandatory requirement for 10% BNG will play a crucial role in delivering ecological gains on the ground. As highlighted, this will require careful consideration of site layout to accommodate delivery onsite, which is the preferred option as set out by Natural England. | No | No |
| 387 | _026b/10 | Charles Ainger | - | GBI Strategy | - | - | - | General Comment | Identify community accessible green spaces in existing housing developments. | Comment noted. Public open spaces already shown on the Local Plan Policies Map. | No | No |
| 388 | _026b/11 | Charles Ainger | - | GBI Strategy | - | - | - | General Comment | Don't just encourage early engagement to inform design process, require it. Consider initial site layout options and integrate implications of modal shift and less cars with requirements of GBI Strategy. Less of one can make space for the other. | Comment noted. The Council offers and promotes a pre-application service, which whilst this is something we actively encourage as early engagement to inform the design process, it is not something we can require. | No | No |
| 389 | _026b/12 | Charles Ainger | - | GBI Strategy | - | - | - | Support | Your first paragraph is exactly correct: 'As this Strategy has demonstrated, GBI should be considered right from the start of the design stage of a development proposal, instead of being an add on afterthought'. Important to change the developer's approach to site layout, right from the start. One key to providing site space for GBI is to provide less space, and maybe different locations, for cars, which fundamentally affects site layout – also number of homes to be built, so hence sales value. Their differences in cost must not be | Support noted. | No | No |

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| | | | | | | | | | accepted by the Council in viability assessments as ‘abnormal’ costs; so they must be reflected in the land price paid by the developer. Pre-layout discussion and influence needs to be embedded in the planning process. | | | |
| 390 | _026b/13 | Charles Ainger | - | GBI Strategy | - | - | - | General Comment | Finding space onsite for 10% BNG – link to Savills research article provided. Highlighting the quote ‘However, in many situations, delivering BNG within the original development will have too great an effect on build density and associated economic viability’. Provided Marmalade Lane, Cambridge as an example to show how reduction in space for cars enabled more space for green space. Concern that meeting 10% BNG by offsetting means it will likely not provide the very local BNG the Council wants. So for any development location, the Council should identify if there is any local green space that requires improvement, then if there is can direct Developer to improve that by off-set to achieve 10% BNG. Otherwise should require all BNG onsite – which can at the same time provide SuDS, better community layouts, less traffic onsite etc. | Comment noted. As highlighted through the GBI Strategy, the priority is the delivery of GBI onsite as part of development design. Like the approach with BNG, only where this is not possible will it then be appropriate to look to deliver GBI/BNG offsite locally. As shown in the table in Appendix 4 of the GBI Strategy the Council is going to explore and identify specific ways in which (projects) GBI improvements can be delivered on the ground. From a BNG perspective this will be worked up further through the proposed BNG SPD. | No | Yes |
| 391 | _026b/14 | Charles Ainger | - | GBI Strategy | - | - | - | General Comment | Familiar with Case Study 1. The final plan provides a good GBI example. But some points to note: the drainage was only finally addressed adequately, after community protests and many revised plans by developer – so there should be compulsory early engagement, not just encouraged, at site layout options stage. Understands developer counted on the ‘extra’ cost of doing drainage properly on a steep site as an ‘abnormal cost’, allowing a reduction in affordable housing. This must not be allowed to happen for GBI Strategy? | Comment noted. Through the GBI Strategy, which has subsequently informed the Local Plan Review, we seek to highlight the multifunctional value and subsequent benefits GBI can provide with careful consideration at the design stage, early on in the process and as an integral part of design, so not seen as an ‘extra’. | No | No |
| 392 | _026c/ | Charles Ainger | - | Community Infrastructure Levy | - | - | - | Support | The levy should be used for the adaption of Key infrastructure to deal with climate change. | The comments will be given due consideration as the City Council considers the scope and role of CIL within the district. | No | No |
| 393 | _027/ | Tom Clarke | Theatres Trust | Part One Strategic Policies and Land Allocation DPD | 6 | CC1. | 6.5 | Supporting | Support the revisions to the Plan. Note that it would be beneficial for the future plan to contain guidance on adaptations to heritage assets as there can be conflict between sustainability measures and the historic environment. | Support noted. The Council has included two new policies in the Plan to help address the concerns raised: Policy DMCC1 ‘Retrofit of Buildings of Traditional Construction for Energy’ and Policy DMCC2 ‘Micro-Renewables in the Setting of Heritage Assets’. | No | No |
| 394 | _028/01/ | John Walker | N/A | Part One Strategic Policies and Land Allocation DPD | 13 | DM53. | 13.2 | General comment | DM53: . Renewable and Low Carbon Energy Generation: All new builds should have integrated solar panels in the roof. There are several examples of this in new developments north of Preston, north of Chorley and one nearer to Manchester. | Comments noted. The CELPR advocates a fabric first approach to net zero CO2e emissions by 2028. This approach follows building homes with low energy demand and high energy efficiency and then including renewable energy technology to meet net zero CO2e emissions (as set out in Policy DM30a of the CELPR). This approach allows flexibility for the most appropriate renewable pathway to be taken for each property, location, and situation. For many properties this will quite likely mean the inclusion of solar panels. | No | No |
| 395 | _028/02/ | John Walker | N/A | Part Two Development Management DPD | 9 | DM33. | 9.19 | General comment | DM33: Development and Flood Risk: Many of the recommendations are just recommendations and need to be requirements if developers are going to implement them. Developers should be required to plan for a 1:1,000 year flooding event. Requirement to follow the Sustainable Drainage Hierarchy. Abandon SuDS underground tanks - they're never maintained. No development should be signed off until the surface water drainage measures have been inspected and confirmed to be in place (as happens once a building has reached dpc). | LCC considers that the policies are strong enough in terms of wording to ensure that the requirements are met. | No | No |
| 396 | _029/ | Robert Bailey | Carnforth Town Council | Part One Strategic Policies and Land Allocation DPD | 6 | CC1 | 6.5 | Supporting | Response sets out how the emerging Neighbourhood Plan supports the CELPR | Comments noted | No | No |
| 397 | _030/01 | A Day | ATP on behalf of Derwent Estates | Part One Strategic Policies and Land Allocation DPD | 2 & 8 | - | 2-8-2.10, 8.5 | | The paragraphs fail to recognise the substantial viability challenge to delivery of jobs and investment. | These paragraphs form part of the recently adopted plan and are not within the scope of the Climate Emergency Local Plan Review. | | No |
| 398 | _030/02 | A Day | ATP on behalf of Derwent Estates | Part One Strategic Policies and Land Allocation DPD | | EC1 | 18.21 | Object | Policy EC1 and paragraph 18.21 set out an intent for EC1.14 to be used for offices despite long term evidence that this is unviable, a more flexible approach is required. Policy EC1 is therefore unsound. | This is a recently adopted policy and the allocation of sites and their uses are not within the scope of the Climate Emergency Local Plan Review. | No | No |
| 399 | _030/03 | A Day | ATP on behalf of Derwent Estates | Part Two Development Management DPD | 5 | DM14 | 5.4 | Object | The policy cross references policy EC1, if policy EC1 and the associated paragraph at 18.21 are amended the object is withdrawn. | This is recently adopted policy and the allocation of sites and their uses are not within the scope of the Climate Emergency Local Plan Review. | No | No |
| 400 | _030/04 | A Day | ATP on behalf of Derwent Estates | Part Two Development Management DPD | 6 | DM19 | 6.17 | Object | Revised wording proposed. The thresholds are not justified or credible therefore the policy is unsound. | This is a recently adopted policy and is not within the scope of the Climate Emergency Local Plan Review. | No | No |
| 401 | _030/05 | A Day | ATP on behalf of Derwent Estates | Part Two Development Management DPD | 9 | DM30a | 9.16 | Object | The requirement to meet BREEAM Excellent should be amended to ‘aim to meet’. The policy requirement will impede deliverability therefore is unsound. | The policy includes flexibility where the Excellent standard cannot be met and evidence to support a reduced standard is available. | No | No |
| 402 | _030/06 | A Day | ATP on behalf of Derwent Estates | Viability Assessment | - | - | - | Object | The viability assessment found that in respect of employment, none of the typologies produced a positive residual value, yet concludes the additional policy costs will be relatively limited and therefore is not an impediment to development. To increase obligations on a sector which is sub-viable will further prejudice delivery. This is unsound and the council should rethink its approach. | The implications on viability of the additional climate change measures are limited. It is therefore considered that in the context of the need to ensure development minimises carbon output, the impacts on delivery will also be limited. | No | No |

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| 403 | _031/a & b | Cameron Hodgson | - | Community Infrastructur e Levy | - | - | - | Support | CIL should be used for flood defences and mitigation. | The comments will be given due consideration as the City Council considers the scope and role of CIL within the district. | No | No |
| 404 | _031/c | Cameron Hodgson | - | Part One Strategic Policies and Land Allocation DPD | 2 | T2 | 2.4 | Support | Great work | Comment noted | No | No |
| 405 | 031/d | Cameron Hodgson | - | Part One Strategic Policies and Land Allocation DPD | 2 | T1 | | Support | Great work | Comment noted | No | No |
| 406 | _032/ | Martin Haworth | - | Community Infrastructur e Levy | - | - | - | Support | CIL should apply to all development in all areas. Funds should be used for maintenance. | The comments will be given due consideration as the City Council considers the scope and role of CIL within the district. | no | No |
| 407 | _033/1 | Thomas Gibbon | N/A | DPD | - | - | - | General Comment | You approve new developments relying on drainage designed decades ago or on soak aways which are useless when groundwater rises. You permit acres of hard standing while the water absorbing land is massively reduced. The new developments impact existing ones negatively which you refuse to acknowledge. You need to manage future flood risk and the impact on sewerage. You approve new developments without consultation from the Environment Agency. Maintenance of existing drains are nowhere near what they were in the 1950s when they were cleaned out regularly. Try driving around every time there is 24 hours of continuous rainfall and see all the blocked drains/flooded highways/impact on property. You need overflow dry lakes near rivers for when they flood which can be pumped out or drained when the floods recede. You need to organise flood wardens who can contact residents by text message to take precautions. You need to liaise with the Fire Brigade Service/flood wardens to acknowledge and prevent floodwater pumping which floods other properties | Flooding and SUDs and the issues raised in this response are considered within the CELPR with new policies proposed to assist in addressing current issues on the matter of wate management. | No | No |
| 408 | _034/01 | Barrie Cooper | - | GBI Strategy | - | - | - | General Comment | There are some laudable statements regarding biodiversity in the plan, however the reality is that there is a desperate need to make wholesale and visionary changes to improve the plight of biodiversity in the District. | Comment noted. | No | No |
| 409 | _034/02 | Barrie Cooper | - | GBI Strategy | - | - | - | General Comment | Outside of the A&S AONB biodiversity enhancement is either fragmented or non-existent. Away from the AONB it seems that there are only a few pockets of natural habitat where wildlife is hanging on but facing habitat degradation or loss, disturbance and pollution. E.g. corridor adjacent to the Lune cycleway running from the end of New Quay Road to Conder Green could be significantly improved for wildlife. The farmland at the northern end of this corridor is managed in a very wildlife-unfriendly way with some hedges severely cut twice a year, fields where Lapwing, Redshank and Oystercatcher nests are displaced. | Comment noted. The fragmentation and quality of the Districts biodiversity assets is a concern. So, the GBI Strategy has sought to emphasise the importance of connectivity, particularly in the face of climate change with the need to build networks that are more resilient to changes in our climate, allowing species to easily move when required. The enhancement of our GBI network is also another key aim of the GBI Strategy to reverse habitat degradation or loss. We are seeking to identify specific ways in which this can be achieved and so we will explore opportunities for doing so along the Lune cycleway. The ability of planning to directly influence farming practices is very limited, however with the emergence of Local Nature Recovery Strategies and the involvement of farmers and landowners, it is hoped that this will help to achieve a more joined-up approach to nature recovery. | No | Yes |
| 410 | _034/03 | Barrie Cooper | - | GBI Strategy | - | - | - | General Comment | Disturbance of birdlife by dog walkers on the Lune saltmarsh (an SPA) is a frequent problem with feeding, nesting and roosting migrant birds continually having to move on. | Comment noted. Recreational pressure is a concern that the Council are aware of, and this has been assessed through the Habitat Regulations Assessment (HRA) which accompanies the Local Plan. Within the GBI Strategy itself, recreational pressure on Morecambe Bay increasing levels of disturbance/displacement to birds is recognised as a key issue for ecology & biodiversity. To address this, one of the emerging opportunities identified in the GBI Strategy is to ‘In accordance with the HRA for the adopted Local Plan (Part 1), investigate the impact of recreational pressure upon Morecambe Bay for housing developments within 3.5km and employment developments within 1.5km’. In terms of aspirations for the future, the GBI Strategy does then highlight that whilst reducing recreational pressure is something we would like to target through the provision of GBI, in particular large green spaces such as Country Parks, it is considered that this is adequately addressed and mitigated for through the HRA recommendations. | No | No |
| 411 | _034/04 | Barrie Cooper | - | GBI Strategy | - | - | - | General Comment | Some of farmland along the Lune cycleway is almost green desert with intensive grass grown for silage with poor wildlife value. If this area was rewilded with some of the fields enhanced by habitat creation such as wetlands, it will benefit wildlife and help flood alleviation. The improved habitats for wildlife would also provide opportunities for public education as well as the noted mental health benefits. | Comment noted. It is recognised that the GBI Strategy could go into more detail in terms of rewilding. This will be explored further. | No | Yes |
| 412 | _034/05 | Barrie Cooper | - | GBI Strategy | - | - | - | General Comment | Continued development of new housing in this area will result in more pressure on natural habitats and be contra to the aims of the Climate Action Plan. | Comment noted. The Council recognises the importance of the climate crisis we face through the declaration of a Climate Emergency, the implications of which are to be implemented across all areas of the Council to ensure the declaration is addressed. The Council recognises the importance of the balance between new housing and protecting our natural habitats. We need to ensure we are providing the right homes in the right places to meet the needs of our human residents, whilst also protecting and enhancing the habitats that house our wildlife. So, planning policies have been put in place to carefully manage this to ensure both aims are met without detriment to the other, and this current review ensures policies particularly address the impacts of climate change and the aims of the declaration. | No | Yes |
| 413 | _034/06 | Barrie Cooper | - | GBI Strategy | - | - | - | General Comment | Other opportunities for improvement at the species level is the condition that planning permission for developments is subject to the installation of ‘swift bricks or nestboxes’ to help this declining species. | Comment noted. Policy DM44 ‘The Protection and Enhancement of Biodiversity’ does state that where appropriate development should seek to achieve beneficial measures within the design and | No | No |

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| | | | | | | | | | | layout of development, and specifically states practical measures such as swift bricks, hedgehog highways, bat boxes or access tiles and living walls. Such measures are also set out in policy DM29 'Key Design Principles'. | | |
| 414 | _034/07 | Barrie Cooper | - | GBI Strategy | - | - | - | General Comment | Council needs to be working with local police force to reduce the levels of disturbance and illegal activities that are increasing in areas of countryside such as Lune corridor. | Comment noted. Whilst we recognise this is an important issue, and the police force are consulted on the Local Plan, day-to-day on the ground incidences are usually dealt with by Public Realm as opposed to the Planning department. But in terms of forward planning the Council do seek to involve the police force. We have a number of contacts from the Police Force on our consultation database. | No | No |
| 415 | _035/01 | Kathy Pitt | - | Part Two Development Management DPD | 11 | DM43 | 11.2 | Support | The planning and maintenance of corridors and green chains to prioritise biodiversity is very important, The policy needs to be carefully enforced throughout the design of Bailrigg Garden Village. | Comments noted. | No | No |
| 416 | _035/02 | Kathy Pitt | - | Part Two Development Management DPD | 9 | DM30a | 9.16 | General comment | The requirement for carbon zero homes should be brought forward to 2022 not increased gradually. | The gradual increase is required for viability reasons and to allow developers time to adapt to the requirements. | No | No |
| 417 | _035/03 | Kathy Pitt | - | Part Two Development Management DPD | 9 | DM33 & DM44 | 9.19 & 9.30 | Support | I agree with the promotion of natural flood techniques to mitigate intense rainfall. Design needs to take account of the run-off and corridors for bio-diversity. | Comments noted. | No | No |
| 418 | _035/04 | Kathy Pitt | - | Part One Strategic Policies and Land Allocation DPD & Part Two Development Management DPD | 2 & 16 | T4 & DM64 | 2.4 & 16.34 | Support | The plans to make city centre traffic flow are very helpful to reduce carbon but their implementation needs to be brought forward to the next few years so that all new developments will take account of reduced private vehicle movement around the centre. I also agree with a strong policy for buses, given the existing traffic infrastructure of this area, and a planned introduction of existing buses with electric ones. | Comments noted. | No | No |
| 419 | _035/05 | Kathy Pitt | - | Part Two Development Management DPD | - | - | | General comment | There could be a clearer policy on supplying specially adapted water butts into houses with small yards, as so many existing homes in the area do not have gardens but want to grow vegetables and plants. | The policies refer to the reuse of water and set out amenity standards to external space. | No | No |
| 420 | _036/1 | Lawrence | - | DPD | - | - | - | General Comment | Thank you for the reminder but a days notice does not give me time to review and comment. If the increase in housing in the South of Lancaster is now included then I not seen a justification for it. I object to the increase in housing without a corresponding plan for the supporting infrastructure i.e. schools, medical facilities etc. | A reminder email was sent out a day prior to the close of the consultation however the consultation was open for 8 weeks with an email going to this email address at that stage so 8 weeks notice was given, not 1 day. The CELPR does not propose an increase in housing and does not dela with housing numbers. | No | No |
| 421 | 037/a/1 | Mary Kinane | - | DPD | - | - | | General Comment | It's not clear to me that consultation has been done with key groups of people (mentioned in the reviewed text of this document) who would be most hard hit by such changes, namely those living with mobility impairment & others (including sensory disabilities), who constitute at least 10%, if not more, of the demographic of this region. I understand that further consultation is intended when the feedback from this Survey is looked at - I would only urge that it's vital that this key group, who are traditionally (and often digitally), excluded from the conversation, be consulted & included in any discussions & consultations which follow. Maximised wellbeing cannot be achieved without the right kind of consultation with key groups. | The council holds a consultation database which has over 2,300 listed. Within this there are approximately 98 advocacy groups signed up. The main groups we liaise with, for those hard to reach, disability etc. include Action on Hearing Loss, Age UK Lancashire, CVS Lancaster and CAB. | No | No |
| 422 | 037/a/2 | Mary Kinane | - | Part Two Development Management DPD | - | - | - | Support/General Comment | It's heartening to see that the inclusion of mobility adapted vehicles (scooters, wheelchairs, walking aids, adapted cycles) is starting to make its way into the body of this document; I would only urge a continued diligence and that sufficient attention be paid to what this means in real terms for real people living with disability in the region. Also, having consultation with real disabled people offers opportunities for increased creativity and resourcefulness, where re-design and inclusion is concerned, & when making this ambitious modal shift from the private car to accessible public transport. I understand from the planning point of view that the devil will be in the detail of this consultation, and that the contents of this short email may not easily be slotted into one section or another; however, I'm sending this message in good faith on the due date of the current consultation and would welcome the opportunity to continue this conversation with yourselves; I am also in a position as a member of the Morecambe Bay Poverty Truth Commission to reach out to a number of others with lived experience of disability who could very usefully contribute to the next phase of consultation. | Comments noted | No | No |
| 423 | _037b/1 | Mary Kinane | - | DPD | - | - | - | General Comment | I had also wanted to offer a comment about the installation of new EV Charging points intended for the district but this report (please see the link below) only reached me on 20th September from Disabled Motoring UK. I trust the information contained (it's a short bulletin) might help to inform the Planning Department's decisions when EV Charging is rolled out on a larger scale, so as to make EV charging accessible to everyone who drives, or aspires to driving, an electric car. As you will see from the bulletin in this month's DMUK newsletter, some disabled people have already taken that decision, in different parts of the country, with varying degrees of success when it comes to re-charging facilities. https://www.disabledmotoring.org/news-and-features/news/post/715-dmuk-conducts-auditon-ev-chargeraccessibility?utm_source=smartmail&utm_medium=email&utm_campaign=Full+Members+Newsletter | Comments noted. Policy text related to the accessibility requirements for EV charge points has been included in DM62. | Yes | No |

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| 424 | _038/2 | Steve Wallis | - | DPD | - | - | - | General Comment | Objects to principle of review as it doesn't take into account the proposed growth in South Lancaster. Concerns over nuclear power stations and the increased population and lack of consideration of emergency evacuation. | Comments noted. Growth in S Lancaster is outside the scope of this review. Emergency Planning were a consultee as part of consultation (including both Heysham Power Station EDF and Lancashire County Emergency Planning/ Emergency Planning (ONR Land Use Planning)). | No | No |
| 425 | _039a/3 | Melanie Lindsley | Coal Authority | Community Infrastructure Levy | - | - | - | General Comment | No specific comments to make. | The comments will be given due consideration as the City Council considers the scope and role of CIL within the district. | No | No |
| 426 | _039b/4 | Melanie Lindsley | Coal Authority | GBI | - | - | - | General Comment | No specific comments to make. | Comments noted. | No | No |
| 427 | _040/1 | Diane Sammons | For Peat's Sake | GBI | - | - | - | General Comment | The document is highly detailed and clearly a huge amount of effort and expertise has gone into its formation. However it is dense and the chapters not easy to find online. | Comments noted. | No | No |
| 428 | _040/2 | Diane Sammons | For Peat's Sake | GBI | - | - | - | General Comment | I am summarising some of the additions I would like to see contained within, not in terms of specific chapters but in terms of necessity of inclusion: - Urgent mapping of wetlands, as you are aware it has been missed "Unfortunately, the latter was never mapped, and so the location of this network is not identified on the interactive mapping", so it can be included asap. - Priority given to rewet all degraded sites - Hans Joosten, an luminary authority on peatlands and a member of the IPCC, in the closing statements of the 4 day IUCN conference yesterday stressed that to meet the Paris agreement deadline " All peat oxidation has to stop, there is to be no use of extracted peat for any purpose anymore and we should rewet all drained peatlands and take care that all pristine peatlands remain in this condition". If I can urge you to check these issues are included as in need of urgent attention. | Comments noted. Will look into obtaining data as part of next iteration of mapping. Looking at peat data. Will also look further emphasise the role of peat restoration in next iteration of GBI Strategy. | No | Yes |
| 429 | _040/3 | Diane Sammons | For Peat's Sake | GBI | - | - | - | General Comment | Adopt a peat-free policy for all council horticultural procedures. As Lancaster Council has declared a Climate Emergency, we feel it is essential that you consider your use of peat and commit to changing any current practices that undermine the Government's recent commitment to consult on a ban on horticultural peat by 2023. This government sadly missed a previous target to introduce this ban by 2020. The adoption of a peat-free policy by your authority will send a powerful message to the government and the residents you represent. Many local authorities and other organisations are now recognising the evidence on the carbon value of peatland along with its climate change implications. There is irrefutable evidence that peat acts as a huge carbon store and that 'working' peatbogs sequester huge quantities of carbon. In last month's Natural England's research report, they state that "peatlands represent the largest terrestrial carbon store by habitat". Therefore saving, preserving and restoring peat bogs will help reduce the magnitude of the climate emergency. Known peatlands only cover about 3% of the world's land surface but store at least twice as much carbon as all of Earth's standing forests. If peat extraction is not halted and the peatlands restored, they will emit twice as much carbon as all the tree planting the Committee on Climate Change's UK forestry targets aim to capture! Growing media on sale to the UK public contains 40% peat, on average, and that used in the horticulture industry, 60%. Local authorities purchase growing media for all their horticultural procedures and thus have a choice to buy peatfree. | Comments noted. From a corporate perspective the call to adopt a peat free policy is being explored. As an example of the change in approach taken by the Council to address this matter, peat free compost has been used for all of the wildflowers grown this year. | No | No |
| 430 | _040/4 | Diane Sammons | For Peat's Sake | GBI | - | - | - | General Comment | Cherwell District Council went peat-free in February 2020. "The council already has access to huge amounts of 'homegrown' naturally peatfree compost and this should be the first choice when these materials are required. As a general principle the council should only use compost and soil improvers generated through its own waste recycling and composting facilities and avoid the use of commercially produced compost in all but the most exceptional circumstances. This will not only be cheaper, it will also avoid the additional carbon created in the manufacture, packaging and distribution of commercially produced composts". Good quality, non-peat growing media are available, so we are urging local authorities, other organisations and gardeners to actively divest from peat and embrace climate-friendly alternatives in all your Grounds Maintenance activities, including sourcing peatfree floral & bedding plants suppliers. To compensate for a total ban on the selling and use of peat-based compost, the Council should be encouraging garden owners to produce their own compost. Undertaking research and development into successfully converting green waste and leaf mould into municipal soil improver to give/sell to residents would support them to make the transition into creating their own compost. As well as providing valuable carbon sinks, peatlands help to reduce the risk of flooding in vulnerable floodplains, so this is another reason they should be protected and enhanced. The conservation of peatlands should also be promoted within the context of rewilding and enriching biodiversity. The protection and management of peatlands should be included in the Lancaster Local Plan. Councils such as yours are in an extremely strong position to act as changemakers regarding this issue, by adopting good practice and influencing others to follow suit. One of the -Climate Change Committee's key recommendations is to deliver Net Zero on land, s-o please would you ensure that these issues are discussed and put on the next Climate Emergency Working Group agenda. Lancaster City Council going peat-free will send a powerful message to residents and put the council in a strong position in your journey to Net Zero carbon and in reducing waste. Let 2021 be the last year in which your council uses peat based products from source to planter. Many thanks for your support with this crucial issue. | Comments noted. The Local Plan Review does now cover composting. Will look to include more on the value of peatlands within the GBI Strategy. From a planning policy perspective peat is protected by national policy and you are not allowed to extract it (criteria d) under paragraph 211. This approach is noted in the Minerals and Waste Local Plan produced by Lancashire County Council. From a corporate perspective the call to adopt a peat free policy is being explored. As an example of the change in approach taken by the Council to address this matter, peat free compost has been used for all of the wildflowers grown this year. | No | Yes |
| 431 | _041/ | Sara Bundy | - | GBI | - | - | - | Support/General comment | Please to see the strategy but it is urgent need to strengthen the strategy so that environmental habitats and protected woodlands are not ruined by development in South Lancaster. There will not be enough space for natural water management with the additional development planned. Development in South Lancaster is at odds with the climate emergency agenda and must not go ahead. | Decision on the development in South Lancaster are not within the scope of the CELPR. These matters will be addressed within the Lancaster South Area Action Plan. An AAP specific GBI Strategy is going to be produced. | No | No |
| 432 | _042/01 | Marcus Hudson | Lancashire County Council | Community Infrastructur e Levy | - | - | - | General comment | In terms of education our experience of CIL has not been favourable. So our preference would be for education to be dealt with via S106 planning obligations. Other points to mention: planning guidance suggests the need for a good reason to have planning obligations in addition to CIL in CIL adopted areas, so may cause an issue for Lancaster. Should Lancaster decide to go down the CIL route, full cost of site acquisition and build cost for education places would need to be factored into R123 list (also needs to consider cost of SEND and early years places if required) has consultation been undertaken on what is to be included in R123 list? If not, how can CIL rate have been calculated? Or is intention to deal with education outside of CIL? Another negative to CIL is lack of certainty regarding funding. An application gets approved and then the authority has to apply to the district for CIL funds, at which point is it too late to object to an application? | City Council acknowledges the issues and points raised by the County Council in relation to the implementation of a CIL charge in the district (particularly in their role as infrastructure provider). Their comments will be given due consideration as the City Council considers the scope and role of CIL within the district. | No | No |

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| | | | | | | | | | In other CIL Districts, County do not have any direct agreement between themselves and applicant, as do with S106, meaning conditions such as clawback are not stipulated. | | | |
| 433 | _043/1 | Stephen Dealler | Green Door | DPD | - | - | - | General comment | Developers bid for the land that they will build on in competition with other developers. Their bid, if it is to be the highest must cut corners or put in extra costs to the house buyer....unless further regulations are in place from the council that all the developers must include in their house designs. But house buyers have no extra money. Because of this, by making housebuilding more expensive through local regulations all that happens is that all the bids for the land will drop. One regulation (like the insulation EPC B) might be to offer buyer free PV cells on the roof. So the value of the land drops slightly. Buyers of the house would be able to produce solar electricity (quite a lot at current times). | The packages that are offered to buyers is out of the cope of what the Council can achieve trough planning regulations. The VA illustrates how additional CELPR policy requirements are achievable (for the Developer). | No | No |
| 434 | _043/2 | Stephen Dealler | Green Door | DPD | - | - | - | General comment | A large numbers of houses in Lancaster have a low EPC rating. Houses on average in the UK are sold every 20 years, but cheap terraces often sell every 6 years because they are the cheapest and used to get on the housing ladder by younger people. Lancaster has a lot of terraces with low EPC. When someone buys a house with a crumbling kitchen this is obvious on the on-line sales brochure so it is sold for less. Low EPC rating houses are also sold for a bit less. A project which is being taken up by the University of Lancaster is to put a local levy on houses being sold that is to be spent on full insulation by the buyer, who receives the money when the work has been done within 2 years. The levy is enough to pay a local company to do the work and make a profit. If the seller does not want this levy to appear then they can do the insulation themselves and no levy appears but the savings on the energy are enough to pay interest and capital on the loan to do the work over a period (see Green Deal as was). Any buyer could do the work partly themselves and make a profit. Any seller could just sell the property (as a percentage of the full insulated price) and buy another uninsulated property with which, of course they would get the levy given to them when they insulated it. I am expecting the details from the University and a full report (March) on how this would be expected to work. This is most effective in the NW of England (published) and in terraced brick or stone houses. If it is shown to work mathematically, a survey would be needed, permission from Government I suspect, and then going towards all of these terraces fully insulated by 10 years later. Lancaster would be a really good place to try this out. I'm happy to explain all this to you directly. | Comments noted. | No | No |
| 435 | _043/3 | Stephen Dealler | Green Door | DPD | - | - | - | General comment | Rainwater harvesting. We have done this at the Victoria Pub which is now 2 West Rd. It does not save enough water, even in 9 cubic meters of saving space. A bit depressive. Full figures available. | LCC still consider that this should dbe considered within schemes. | No | No |
| 436 | _043/4 | Stephen Dealler | Green Door | DPD | - | - | - | General comment | Mechanical ventilation heat recovery (MVHR). We have insulated properties to EPC level A in some cases. So ventilation became important. This can be done in a terraced house using a single ventilated device which takes air from individual rooms, pumps it outside but takes its heat and uses that to heat up air that comes into the rooms. We have MVHR in all the flats of 2 West Rd and it appears to work well. | Comment noted. | No | No |
| 437 | _043/5 | Stephen Dealler | Green Door | DPD | - | - | - | General comment | External wall insulation internally. This can be done remarkably easily and cheaply but would require the removal of large amounts of internal plasterwork. This can be done to a high standard and be used at the same time to rewire the wall involved. It has surprised me just how little is lost in the size of the room. A terraced house in Skerton was insulated like this just to be able to find out the effect on the feeling of warmth in the building. Full in formation about this is available from Cllr Chappell or I will get it for you. | Fabric First approach to new housing is advocated through the CELPR. | No | No |
| 438 | _043/6 | Stephen Dealler | Green Door | DPD | - | - | - | General comment | Heat pumps. There are now vertical ones that do not need large areas of garden. | Comment noted. | No | No |
| 439 | _043/7 | Stephen Dealler | Green Door | DPD | - | - | - | General comment | Planning for car electrical recharging when the house planners come to you with plans. Large new estates surely must have this ready for them by the time the house is built. I live in a new-build house but there was no charging site. It was difficult to get this put in initially. There are now ways possible through pop-up sites in the road. | ECVP policy included within the CELPR | No | No |
| 440 | _044/1 | Matthew Dawber | Barton Wilmore OBO Story Homes | DPD | - | - | - | General comment | References to the NPPF within the LPCCR should be revised so that the 2021 iteration is cited, rather than the previous 2019 version | Where possible throughout the plan, LCC will amend the referencing to the NPPF to reflect the recently published 2021 version as part of the Reg 19 Publication version. In some instances however amendments to the NPPF referencing could potentially change elements of the Local Plan which lie outside of the scope of the CELPR. Therefore changes will be made on a case by case basis. | Yes | No |
| 441 | _044/2 | Matthew Dawber | Barton Wilmore OBO Story Homes | - | - | - | - | General comment | There is concern that the viability position within the City is already very challenging. This is owing to the build quality requirements, affordable housing contributions, infrastructure requirements, and other elements that result in significant costs against developments. A consultation response specific to viability matters related to the LPCCR has been prepared by Cushman and Wakefield and submitted on behalf of the Cumbrian Housebuilders Association, of which Story Homes are a signatory. This expressed significant concerns regarding the key assumptions proposed in the Viability Appraisal prepared by Three Dragons. Additional expense associated with measures detailed within the LPCCR will serve to exaggerate these problems if there is not a consideration of whether other requirements should be lowered or removed to accommodate additional ones. This assessment should be done with reference to the viability position of sites on a case-by-case basis. | Comments noted. | no | No |
| 442 | _044/3 | Matthew Dawber | Barton Wilmore OBO Story Homes | Part One Strategic Policies and Land Allocation DPD | 6 | CC1 | 6.5 | General comment | The aims and goals detailed within this policy are to be lauded given the commitment to responding to climate change set out in the NPPF, as well as from members of the development industry, including Story Homes. However, while efforts to move towards the cutting of carbon emissions and adapting to climate change are welcomed, this policy reads more of a statement of intent. This is because it is not evident how a decision maker should use this to react to development proposals, other than by referring to other, more specific policies, contrary to the requirement of paragraph 16 of the NPPF. CC1 in effect sets the scene for the policies to come in Part 1 and Part 2 of the Local Plan with regards to climate change and as such should be regarded as a vision rather than a policy. | LCC consider that CC1 is a strategic policy, and as with all the other strategic policies we already have in the SPLA DPD they are of a high-level and set the scene. LCC consider that Policy CC1 is no different to that. In terms of the final paragraph that the respondent would like to see removed, LCC consider that it is a statement of fact in that if the development proposal accords with the relevant policies of the plan, then it will be supported in principle | No | No |
| 443 | _044/4 | Matthew Dawber | Barton Wilmore OBO Story Homes | Part One Strategic Policies and Land Allocation DPD | CC1 | 6 | 6.5 | Object | Should the policy remain, the final paragraph should be removed, as it is unnecessary or illegal depending on the reading of it. The first interpretation is that proposals in accordance with Development Plan policies, and climate change initiatives that also form part of the Development Plan (for example those within this Review document) will be granted consent, is right. But is in essence just repeating paragraph 11 of the NPPF and is therefore unnecessary. | LCC accepts that the CELPR is to be read as a whole and this para could therefore be viewed as repetition. Whilst LCC do not consider that it simply repeats para 11 of the framework, LCC have subsequently removed the final paragraph of Policy CC1. | Yes | No |

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| | | | | | | | | | <p>The alternative reading is that proposals that meet all Development Plan policies will need to meet additional climate change requirements outside of the Development Plan to gain planning consent. This is against the requirements of Section 38(6) of the Planning and Compulsory Purchase Act 2004. The legislation states that proposals should be judged based on the development plan unless other material considerations indicate otherwise. Stating that proposals should demonstrate an additional level of compliance with elements outside of the development plan to be considered acceptable does not follow the requirements or spirit of the legislation</p> <p>If the policy remains it should read as follows: The Local Plan ensures that Lancaster District achieves its social, economic and environmental aspirations, in pursuing sustainable development. Sustainable development is the accomplishment of environmental protection and improvement, climate change mitigation and adaptation, maximised wellbeing and economic prosperity, without negatively impacting the ability of future generations to do the same. Lancaster District will become a low carbon, water sensitive district with a thriving economy, where development is considerate of its natural, historic and cultural assets, through taking a holistic approach to sustainable development, which will protect and preserve the District for generations to come. To achieve this, appropriate concern for the environmental and climatic impacts of development should be embedded within all development proposals from the outset.</p> <p>All development should take opportunities to integrate the principles of sustainable design and construction into the design of proposals. In response to the climate emergency declaration made by Lancaster City Council, the content of this Plan Review will aim to assist in the Council's ambitions towards a reduction of carbon emissions to net zero by 2030. This Plan will support those ambitions by: 1. Ensuring that new and existing development minimise emissions and maximise the use of renewable energy and resources; 2. Ensuring that new development mitigates emissions and lessens the effects of climate change through incorporating measures which provide climate change adaptation and increased climate resilience; 3. Maximising opportunities to encourage a modal shift in transportation from private car use to accessible active travel and sustainable transport through considered design; 4. Contributing positively to environmental gain by improving the connectivity and multifunctionality of the Green and Blue network in the District, protecting habitats and ecosystems, strengthening nature recovery networks, and ensuring biodiversity net gain; 5. Recognising the importance of the use of recycled and low embodied energy materials; and 6. Improving or maintaining the natural functioning of river processes, avoiding placing development in areas at risk of flooding and ensuring new development contributes to reducing flood risk on and off site.</p> <p>Development proposals that otherwise accord with the policies of the development plan will be supported in principle where they can demonstrate that they have incorporated relevant climate mitigation and adaptation measures into their schemes and address the impacts of climate change.</p> | LCC do not agree with the interpretation in relation to the P&CPA 2004. If the proposed requirements in the CELPR are found to be sound by an Inspector, then they will form part of the Development Plan and therefore any expectation that proposals meet these requirements would be consistent with the 2004 Act. | | |
| 444 | _044/5 | Matthew Dawber | Barton Wilmore OBO Story Homes | Part One Strategic Policies and Land Allocation DPD | 10 | SP8 | 10.4 | General comment | <p>The amended text is currently worded that all development must protect, maintain, enhance, and extend the green and blue spaces, corridors and chains that make up the wider network. It is not possible for all types of development to do this, particularly enhance and extend, as development such as a material change of use will not always have the ability to incorporate these measures, nor will inner city regeneration to a significant extent. It is suggested that the wording is changed to the following: Where relevant, development must protect, maintain, enhance and extend the District's green and blue spaces, corridors and chains that make up the wider network, and their multifunctional value, integrity and connectivity to ensure the network is as resilient as possible to the impacts of climate change</p> | Comments noted No mention of word 'all' development. The majority of sites should be capable of integration, where this is not possible the determination would be made on an application/site specific basis. | No | No |
| 445 | _044/6 | Matthew Dawber | Barton Wilmore OBO Story Homes | Part One Strategic Policies and Land Allocation DPD | 24 | T4 | 24.11 | General comment | <p>It is not clear what would count as a deficiency in terms of existing service. It is assumed that this means the frequency of service. However, it should be noted within the policy or explanatory text what level of service is deemed acceptable, and what is not. This will assist developers and promoters of land to assess the suitability of sites properly at an early stage. The inclusion of 'other residential development' as a type likely to generate significant levels of traffic movements and therefore need to subsidise an improved, or new bus service for 10 years is highly problematic for smaller sites. This would particularly be the case for any smaller developments in rural areas to meet an identified local need, or a rural exception site to provide affordable housing.</p> <p>While not stated within the policy itself, it is assumed that the contributions would be made through a S106 agreement. Paragraph 57 of the NPPF is clear that such a contribution must meet 3 tests. Two of these are that it is directly related to the development and fairly and reasonably related in scale and kind to the development. Requiring a non-strategic residential site to remedy existing deficiencies in bus services mainly caused by the cutting of government subsidies and lack of patronage by providing an entirely new bus service, is not directly related to the development nor is it fair and reasonable. The policy also does not make provision for sites located in areas that do not benefit from a frequent bus service, but are within walking and/or cycling distance of facilities. This is an oversight given that other policies within the LPCCR expressly encourage the take up of active transport modes. The supporting Viability Assessment for the LPCCR does not seem to include any consideration of the financial implications of this policy. This is potentially a significant oversight given that the cost of a 10 year subsidy is likely to be significant and potentially problematic, particularly for non-strategic level sites. This needs to be assessed fully and a caveat potentially added to the policy which seeks to make the level of contribution commensurate to the nature of the development, and the viability position on a case-by-case basis. It is also not clear if the evidential basis for this policy has considered the changing situation in relation to working practices and retail when suggesting this policy. This is particularly pertinent following the COVID-19 pandemic expediting existing trends towards home working and online shopping (including grocery shopping) and thus cutting everyday journeys via car and public transport</p> | The need for additional or new services will be determined on a case by case basis. This reflects the number of variables to be considered eg size of site, location, existing services. This is the approach currently taken. Agree likely to be viability issues for 10yrs – policy is to be amended to provide a more flexible approach. | Yes | No |
| 446 | _044/7 | Matthew Dawber | Barton Wilmore OBO Story Homes | Part Two Development Management DPD | 4 | DM3 | 4.24 | General comment | <p>The change from intermediate tenure to affordable homes for sale is welcomed given that it reflects the amendments to the definition of affordable housing within the NPPF. The PPG states that First Homes should make up at least 25% of affordable housing provided via planning obligations. Given the importance of this tenure type, reference may be warranted within the policy itself.</p> | The policy enables for First Homes within the tenures, there is no need to duplicate the nPPG. The wording also ensure that future changes in national policy could be accommodated. | No | No |
| 447 | _044/8 | Matthew Dawber | Barton Wilmore OBO Story Homes | Part Two Development Management DPD | 9 | DM29 | 9.5 | General comment | <p>The maximising of solar gain through orienting homes appropriately is a key part of good design in terms of residential development and should be accommodated where possible. However, this will need to be balanced with site specific considerations such as topography and proximity to existing development. It is also important to consider the implications of density. Building denser means that less land is needed to</p> | Comments noted. The policy wording and options available to meeting the aims of energy efficiency in DM29 are detailed in DM30a through the fabric first approach and energy hierarchy. The | No | No |

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|---|---------|----------------|--------------------------------|-------------------------------------|---------|--------|-------|-----------------------------------|--|---|----------------|---------------------------------|
| | | | | | | | | | meet housing requirement and enables concentrated markets to develop which can support services, such as bus routes. However, this can have the effect on reducing the potential for solar gain. These two matters will therefore need to be balanced through the development of scheme designs. This balance needs to be reflected within the policy wording | policy wording relating to solar gain is considered flexible enough to provide planning balance at a site-by-site basis. | | |
| 448 | _044/9 | Matthew Dawber | Barton Wilmore OBO Story Homes | Part Two Development Management DPD | 9 | DM30a | 9.16 | General comment | The new policy states a requirement for a 31% reduction against current regulations upon adoption of the LPCCR, a 75% reduction by 01/01/2025, and net zero emissions by 01/01/2028. The policy states that the reduction requirements must be achieved using a fabric first approach. Changes to building regulations implemented from 2021 will require a 31% regulation from current requirements. Furthermore, The Future Homes Standard will require a 75% reduction from 2025. These reductions are aligned with those suggested in the revised policy. However, in insisting that the reduction is achieved by fabric first, and not through measures detailed within building regulations, there is a risk of dual consenting regimes being used. Given that the reductions required are to be secured by building regulations, and development cannot go ahead without this approval, it is not deemed to be necessary for this policy requirement. Indeed, there is a risk that proposals that achieve the 31% reduction through the fabric first approach and gain planning consent, may not meet building regulations requirements. This would mean that the development would not go ahead despite planning consent being granted and emissions reductions being theoretically achieved. While the viability statement suggests that following the fabric first approach and the new building regulations is the same in terms of cost increase, no detailed evidence has been produced to support this. This is concerning and should be rectified otherwise the policy cannot be justified as per the requirements of paragraph 35 of the NPPF. The need for a Sustainable Design Statement appears superfluous. Rather, information should be provided within a Design and Access Statement. The Validation Checklist should be amended to provide reference to sustainability measures to be included within the Design and Access Statement. | The proposed changes to the building regulations set out minimum national energy performance requirements. DM30a requirements from 2025 would likely necessitate marginally improved u-values, thermal bridge PSI values and air permeability ratings; similar to a Passivhaus construction. Therefore, this would go beyond and subsequently meet the building regulations performance requirements. The Future Homes Standard consultation states that for the Part L uplift, Government “expect developers will find a wide variety of ways to meet these targets” (p26). DM30a requirements upon adoption of the CELPR could be achieved through means suggested in the building regulations, however a fabric first approach would still achieve the primary energy and CO2 targets that the Part L uplift would require as the aim of fabric first is to reduce energy consumption. Therefore, DM30a requirements would comply with the building regulations. Alongside viability factors, following a fabric first approach is also imperative as it reduces energy consumption and is therefore less reliant on grid decarbonisation to achieve carbon savings, as well as improving the cost of living for occupants. As the Part L uplift has already been delayed, it is important that this policy provides support in case of further unexpected delays. As set out in LPVA21 paras 5.37 – 5.38, the approach to testing the impact of varying building standards is to use a percentage uplift on build costs. These uplifts are based on cost information set out in Appendix A. Page 81 Appendix B provides a breakdown by dwelling type of the cost of moving towards each standard. The detail of these breakdowns by unit type are set out in pages 82 to 100. The figures set out on page 81 also provide a size of unit to which they relate – this enables a conversion of the unit cost to cost/sqm. | No | No |
| 449 | _044/10 | Matthew Dawber | Barton Wilmore OBO Story Homes | Part Two Development Management DPD | 9 | DM30c | 9.44 | General comment | Story Homes is assessing how modern methods of construction can be utilised within its high-quality developments and is therefore supportive of reference to this. The raison d'être of modern methods of construction is standardised and mass-produced house types. This will need to be considered when implementing existing design policies that require development to be in keeping with local character and local context, and the two could potentially be difficult to marry | The Council are addressing this this within the forthcoming SPD and future design coding, and consider that MMC is innovative enough to remain in keeping with local character and context, but also welcomes modern designs on major applications. | No | No |
| 450 | _044/11 | Matthew Dawber | Barton Wilmore OBO Story Homes | Part Two Development Management DPD | 9 | DM33 | 9.19 | General comment | The inclusion of play / recreation areas as uses that should be directed to the areas least affected by flooding is against guidance in the PPG. The Flood Risk Vulnerability Classification at Paragraph: 066 Reference ID: 7-066- 20140306 of the PPG makes clear that amenity open space, nature conservation and biodiversity, outdoor sports, and recreation and essential facilities such as changing rooms are water compatible development. As such, it is not necessary to direct these uses to areas at lower flood risk. Reference to this use should therefore be removed. Point II of the Policy in relation of exception tests repeats verbatim paragraph 166 of the NPPF and therefore is unnecessary. Point IV's reference to FRA's needing to assess developments against the potential impact of climate change is not necessary as this is already routinely done owing to the existing requirements of the NPPF and PPG, and specific guidance issued by the Environment Agency. This should be removed. | GBI Strategy and subsequently GBI policy highlights value of multifunctionality of green and blue spaces. The provision of usable recreation and play areas is important for the social element of sustainable development. Placing these in areas which frequently flood or are waterlogged reduces usability. The policy ensures that these issues are highlighted and will be fully taken into account at the application stage. | No | No |
| 451 | _044/12 | Matthew Dawber | Barton Wilmore OBO Story Homes | Part Two Development Management DPD | 9 | DM34 | 9.30 | General comment | The wording of the third paragraph should be changed to ensure consistency with the Sustainable Drainage Hierarchy set out above it. This amendment would result in the following wording: Surface water should be managed through the provision of above ground sustainable drainage features with multi-functional benefits as part of an integrated high-quality green and blue environment, where possible. All development must incorporate SuDS which have been designed to incorporate the following: The addition of 'where possible' means that if an above ground solution is not feasible alternatives from within the hierarchy can be considered. This flexibility is a fundamental aspect of the Sustainable Drainage Hierarchy. While Story agree that using above ground attenuation as a means to increase biodiversity and aesthetic interest is sensible, the wording of the design requirements for SuDS currently relates to all types. Some solutions, such as those underground, will not be able to include all design implications, such as landscape enhancements. As such, it should be made clear that these design requirements relate only to above ground SuDS solutions | The policy allows for exceptions where above ground SuDS are not feasible. | No | No |
| 452 | _044/13 | Matthew Dawber | Barton Wilmore OBO Story Homes | Part Two Development Management DPD | 11 | DM43 | 11.2 | General comment | The current wording of the Policy is such that it applies to all development. However, not all development will have the potential to enhance or extend the green and blue infrastructure networks. An example of this is material changes of use, which is classified as development, but is highly unlikely to have the potential to enhance or extend green and blue infrastructure networks, particularly onsite. As such, the wording of the policy should be changed to: <i>Where appropriate, development proposals must seek to integrate green and blue spaces, corridors, and chains onsite and forge linkages with the existing wider green and blue infrastructure networks. The design of development proposals must consider the value green and blue infrastructure can provide in terms of recreation, active travel, water management, landscape, biodiversity, and the historic environment, and ultimately contribute towards climate change mitigation and adaptation</i> | Comments noted No mention of word 'all' development. The majority of sites should be capable of integration, where this is not possible the determination would be made on an application/site specific basis. | No | No |
| 453 | _044/14 | Matthew Dawber | Barton Wilmore OBO Story Homes | Part Two Development Management DPD | 16 | DM62 | 16.21 | General comment | In terms of garage provision, it is not currently clear whether the additional requirement for cycle storage to be accommodated is included within the 6m by 3m size stated. This should be clarified. The specific part of the policy relating to cycle storage makes no reference for the need for this to be in garages, opening the prospects of other suitable locations to be used such as sheds. This adds a level of flexibility whilst also | The intention isn't to require a garage size beyond 6mx3m. Agree that, elsewhere, the policy and Appendix E clearly set out cycle storage requirements, so for the sake of clarity the wording can be removed. | Yes | No |

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|---|---------|----------------|--------------------------------|---------------------|---------|------------|------|-----------------------------------|--|--|----------------|---------------------------------|
| | | | | | | | | | ensuring that adequate provision is made. If the cycle storage requirement does not result in a size increase for garages, then reference here is not necessary as secure and convenient storage for bicycles is already required. If the size requirement for garages is to be raised, this new minimum should be required, and justification provided as to why other alternatives, such as sheds, are not appropriate. | | | |
| 454 | _044/15 | Matthew Dawber | Barton Wilmore OBO Story Homes | DPD | - | Appendix D | | General comment | In terms of Table D.1, no justification has been provided for the change in dwelling number thresholds for on-site provision of different types of open space. GBI Strategy Addendum: Initial Outcomes of the GBI Strategy - Considerations & Recommendations for the Local Plan Review references that Appendix D should be amended in accordance with evidence provided by KKP. However, this evidence document does not seem to be available. Clear evidence needs to be presented that these changes are reflective of the need for open space currently present, or projected to be present, within Lancaster. The changes to financial contributions at Table D.2 are also without a publicly available evidential basis Paragraph D.13 references an Open Space Standards Paper produced by KKP. A copy dated November 2018 was produced to support the current Local Plan. However, no update seems to be available to support the proposed changes to that plan. Until such time that these changes are justified by clear evidence they are inappropriate for inclusion. It should also be noted that the impact on the viability of current allocations, and other sites, from a need to accommodate types of open space that was not previously required and the need to make new, or additional, off-site open space contributions does not appear to have been considered in terms of the Viability Assessment. This is a significant oversight as the requirement to include additional open space may impact on the developable area and thus reduce land value. This is potentially a significant issue for smaller sites which will now be liable for additional onsite public open space provision as well as higher contributions to offsite provision. | Comments noted. Appendix D has been revised to reflect the updated evidence base produced by KKP in 2018 to underpin the adopted Local Plan. As the opportunity to incorporate these directly into the DPD did not arise during the examination of the adopted Local Plan we are seeking to ensure the policy reflects the most up-to-date evidence base now. These revised costs have been factored into the Local Plan Review viability assessment and so they have been viability tested. | No | No |

VIABILITY ASSESSMENT RESPONSES

| Table list number (for internal use only) | Ref no | NAME | ORGANISATION | DPD,GBI, CIL or VA | CHAPTER | POLICY | PARA | SUPPORT/ OBJECT/ GENERAL COMMENT | SUMMARY OF RESPONSE | LCC RESPONSE & SUGGESTED AMENDMENT BY OFFICER | ACTION NEEDED? |
|---|--------------------|---------------------------------|---|----------------------|---------|--------|------|----------------------------------|---|---|----------------|
| 455 | _006/01 & _007b/01 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield prepared on Behalf of a Developer Consortium: Story Homes, Gleeson Homes, Persimmon Homes, Oakmere Homes, Eric Wright Group, Taylor Wimpey, Redrow Homes, Rowland Homes Cushman & Wakefield on behalf of L&K Group (Cushman & Wakefield on behalf of the Consortium & L&K Group) ¹ | Viability Assessment | | | | General Comment | Impact of Covid-19 - acknowledge that ‘there is an absence of relevant/sufficient market evidence on which to base our judgements.’ | A viability study is always a point in time and reflective of current circumstance. The Local Plan Review Viability Assessment, May 2021 (LPRVA21) has sought to account for any extremes within the testing by taking a cautious approach to key assumptions such as values – 5.6 & 5.7 LPRVA21. | No |
| 456 | _006/02 & _007b/02 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | The LPRVA21 does not fully accord with the NPPF, the PPG and RIC requirements. Refer to RICS mandatory requirements on conduct and reporting. | The viability study (as required for a Local Plan evidence base), has been undertaken in accordance with NPPF and PPG, which set the standards for work of this nature. Three Dragons also notes the professional standards required of the work. | No |
| 457 | _006/03 & _007b/03 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | C&W state they were not in attendance at the development workshop and were not made aware of the event until after it had taken place. | C&W and a number of their clients listed at the beginning of their representation were invited and attended and participated in the workshop and therefore had full opportunity to take part and respond to requests for further information. A copy of the presentation, including assumptions was also forwarded after the event (See Appendix B LPRVA21) | No |
| 458 | _006/04 & _007b/04 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the | Viability Assessment | | | | General Comment | Comments are made regarding the viability Protocol SPD | The LPRVA21 does include a summary of comments made to the SPD but only where these relate to viability. They are included as the consultation was undertaken within a similar timeframe as the preparation and consultation on the LPRVA21 and therefore considered helpful to capture. | No |

¹ Please note Cushman & Wakefield have submitted similar representations (with slightly different paragraph numbers) on behalf of a Consortium of Developers (Ref 006) and L&K Group (Ref 007b). The summary and responses cover the Cushman & Wakefield representation for both the Consortium of Developers and L&K Group. The page/paragraph numbers referred in the Summary of Response are taken from the Consortium of Developers representation.

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|---|--------------------|---------------------------------|---|----------------------|---------|--------|------|----------------------------------|---|---|----------------|
| | | | Consortium & L&K Group | | | | | | | Please note that the LPRVA21 is separate to the Viability SPD. | |
| 459 | _010/15 | Peter Dutton | Gladman | Viability Assessment | | | | General Comment | The viability assumptions should be based on accurate and up-to-date information on the build costs associated with implementing higher building standards. Build costs, developer return, costs associated with implementing higher standards and other costs should be a true representation of local circumstances. | The approach taken in LPRVA21 is to take the costs and values at a point in time (linked to the latest information at the time of writing) and to keep the costs and value at same date. Information is locally based where available. | No |
| 460 | _002b/01 | Laura Mackay | Roger Hannah Ltd on behalf of Taylor Wimpey | Viability Assessment | | | | General Comment | It is unclear how many of the Viability Assessment inputs are based on a site-specific assessment and how many are based on wider typology assumptions. As per PPG guidance, we would expect all appraisal inputs to be assessed on a site-specific basis. Taylor Wimpey is currently (September 21) preparing technical due diligence for Res8 and that this may indicate that costs are higher than allowed for in LPRVA21. | LPRVA21 takes a proportionate approach based upon appropriate available evidence as required by PPG (Paragraph: 010 Reference ID: 10-010-20180724). This includes the use of information about the North Lancaster allocated site provided to Three Dragons by the Council about site characteristics and known costs. It is noted that further information about scheme costs is being developed by Taylor Wimpey and it is hoped that this will be shared with the Council in due course. | No |
| 461 | _012a/02 | Matthew Symons | Hollins Strategic Land | Viability Assessment | | | | General Comment | The appendices to the viability assessment were not available. | The appendices were available on the website for the full duration of the consultation. | No |
| 462 | _020c/01 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | Peel contend that the VA contains assumptions that are not market facing or evidenced, which means that the assessment of potential improved building standards requirements and CIL rates must be regarded with caution and need alteration. Requests and recommendations are made for the Council to introduce modifications to the VA to make it robust, and representative of a sound evidence base for Plan-making and CIL setting are stated under a series of subject specific headings drawing titles from the VA | Comments noted. See below for responses to the detailed comments. | No |
| 463 | _020c/02 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | Whilst reference is made to the Council's previous evidence, no further detail on the assumptions that were previously adopted are provided, nor any explanation for variations to the methodology. This lack of transparency conflicts with PPGV requirements, with PPGV paragraphs 0086 and 0107 clearly stating that transparency is required in respect of viability appraisal assumptions requirements. To enable an appropriate level of understanding of how the assessment of viability has changed from that used for setting the policies within the current Local Plan, it is considered that a comparison of assumptions should be provided along with explanation of variations. | Whilst the previous viability study has been used to inform LPRVA21, it was prepared prior to 2018 revisions to PPG, so not always appropriate to use all the same assumptions. LPRVA21 testing assumptions and explanation of the sources used are in Chapters 4 and 5. The previous viability work is available on the Council's website ² . | No |
| 464 | _006/05 & _007b/05 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | C&W question whether the typologies are suitable but then consider that they are 'broadly representative of the sites which are likely to come forward'. However, they do suggest that two further typologies are tested at 250 and 400 units, with no reason other than there 'is no typology between 150 and 700 units'. | This was not raised as an issue during or post the development industry workshop when agents and developers had the opportunity to comment. The Local Plan has four sites without planning permission within this range, and these are for 200 (x2), 242 and 250 dwellings (Local Plan H4, H5 and SG11). It is likely that the general viability characteristics of sites of this size will be covered by the Res7 150 dwelling typology. Therefore, it is not considered necessary to undertake further testing as put forward by C&W. | No |
| 465 | _006/06 & _007b/06 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | The net site areas are not stated or understood as to how they are derived. | Net areas can be derived from the number of dwellings and the density per net hectare published in Table 4.1 in LPRVA21. However, for clarity the net areas are set out below: Res1 – 0.06h; Res2 – 0.2h; Res3 – 0.44h; Res4 – 1.39h; Res5 – 0.63h; Res6 – 1.08h; Res7 – 4.17h. LCC provided the site areas for the strategic sites (Res 8 and Res 9) based on master planning – see para 4.6 in LPVA21 regarding SOCGs used in the Local Plan examination, as well as Appendix D in the LPVA21 Technical Appendices. | No |
| 466 | _020c/03 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | | | | No |
| 467 | _006/07 & _007b/07 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | A wider range of densities should be used within the testing. | Densities were discussed at the workshop with the development densities proposed for testing based on previous studies. There were no comments at the time and no specific information provided afterwards. Lower densities have been tested as part of the strategic site testing. While the Local Plan is encouraging higher density development in the future (for example – see para 7.24 of the Local Plan Part 1) there are no specific policies in the Local Plan that specifies the densities that developments should meet. | No |
| 468 | _020c/04 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | The development density, unit mix and unit sizing assumptions are reasonable. | Noted | No |
| 469 | _006/08 & _007b/08 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | The viability work departs from the previous viability study which supported the current Local Plan and was examined in 2020. | Whilst the previous viability study has been used to inform LPRVA21, it was prepared prior to 2018 revisions to PPG, so not always appropriate to use all the same assumptions. | No |
| 470 | _006/09 & _007b/09 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | No evidence or analysis is provided in the report to support assumptions. Only data from last 12 to 24 months should be used. It is suggested that analysis of recently consented new build schemes in each local market area across Lancaster is crucial to understand. | LPRVA21 Technical Appendix F provides both price per dwelling and price per sq m and dwelling floor areas can be simply derived from this if required. Dwelling floor areas were also discussed as part of the workshop in both sq m and sq ft and no comments were raised. It was made very clear that if attendees wanted the testing to include other typologies or dwelling characteristics they were free to put these forward. Use of this wide data set is important as the last 12 to 24 months has seen much less activity than in previous years, so a very small number of schemes could present a bias for one particular type of development which may not be representative. This data on past transactions also provides information on the types of development that has been built across the different markets within LCC area (as shown on page 30 LPRVA21 Appendix B). | No |
| 471 | _006/10 & _007b/10 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | The assumed mix and unit sizes should be varied for each area and it is not appropriate to use the same blanket mix and unit sizes across the entire district. | A range of typologies are tested in all value areas. It is clear in LPRVA21 that some will be more relevant in some locations than in others. The mix is based upon the district wide mix evidenced and recommended within the SHMA and included at table 4.1 of the plan. | No |

² <https://www.lancaster.gov.uk/planning/planning-policy/evidence-monitoring-information>

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|---|--------------------|---------------------------------|---|----------------------|---------|--------|------|----------------------------------|---|---|----------------|
| 472 | 002b/2 | Laura Mackay | Roger Hannah Ltd on behalf of Taylor Wimpey | Viability Assessment | | | | General Comment | We do not consider the proposed mixes to be entirely market facing/ appropriate to cater for RP demand. | The housing mixes are based upon those recommended within the SHMA and the Local Plan. It is therefore appropriate to use these for testing. | No |
| 473 | _006/11 & _007b/11 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | The total site coverage for each typology cannot be identified. If coverage is overstated it will also overstate viability. | The coverage can be derived from the net areas, dwelling numbers and dwelling sizes all of which are apparent in the main and technical reports. For clarity, the site coverage in sq m per ha is presented below: Res1 – 3,783sqm/h - 4,033sqm/h; Res2 – 2,550sqm/h - 3,000sqm/h; Res3 – 2,268sqm/h- 3,048sqm/h; Res4 – 2,815sqm/h – 3,096sqm/h; Res5 – flats; Res6 – flats; Res7 – 2,975sqm/h – 3,216sqm/h. Coverage will vary according to site size, market and affordable housing proportions and mix. These are within the standard development industry norms. | No |
| 474 | _006/12 & _007b/12 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | The use of NDSS in determining the unit sizes, may adversely affect development density. | Use of NDSS is adopted Local Plan policy (DM2). Market dwelling sizes were amended after the workshop to reflect data that indicated that larger market dwellings were being brought forward in excess of NDSS. Dwellings sizes were estimated from an analysis of EPC records and reflect current industry norms. The size of dwellings used are set out in LPRVA21 Table 5.3 | No |
| 475 | _020c/05 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | The build cost costs and sales values are based on the same floor area with no allowance for non-saleable space where flats are included. Non-saleable allowance should be increased from 15% to 20%. | LPRVA21 para 5.2 explains the approach to flats. | No |
| 476 | _006/13 & _007b/13 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | The variation in market values is supported but it is questioned whether all the information of transactions has been provided and highlights an example of £476psf being exceptionally high. | Sales values have been primarily derived from Land Registry data and EPC data and then cross checked with dwellings then currently for sale – see table 5.6 and para 5.10. In addition, the values used were cautious in respect of the increase in house prices (February 2020 has been used instead of March 2021), as set out in LPRVA21 5.7. The information can easily be worked out from the information provided. Further information has been provided in the LPVA Addendum (Nov 2021). Imperial measurements have been used in the commentary. These are not used in the report as the planning process uses metric, as does the EPC records. The conversion can also lead to misrepresenting the data as can be seen in the conversion, which differs from what is actually reported. £5,120/sqm (£476/sqf) has been used, which is the highest £ per/sqm figure in the LPRVA21 Appendix B (see the table on page 30) as a way of inferring that the information base is incorrect. The relevant context is not provided in presenting this figure – the table is clear that this particular figure is the average drawn from only 9 transactions. The limited data over that period is why the study utilizes a wider timeframe. The whole data set includes a further 137 semi-detached and therefore the impact of the figures representing just 9 transactions is much reduced – which is why it is important to look at a wider base over time and not just rely of a few transactions from the past year that can provide a distorted picture of market trends. | No |
| 477 | _006/14 & _007b/14 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | The approach to indexation is unclear and lacking in detail and using Land Registry HPI is not accurate, and that data should be limited to 2-3 years only with no indexation applied. | It would be unwise to use unindexed information for 2 (or 3) years. Using a short-term database can give undue prominence to particular developments that do not represent overall market performance. The VA uses a more substantial and robust database which takes in just under five years worth of data. The values used have not taken into account the full extent of the indexation post March 2020 as the increase in values during this period is purposefully separated and only impacts on 7% of the dwellings within the data set. The sense checking with dwellings for sale (see LPRVA21 Table 5.6) shows that the indexing has not provided excessive sales values. The use of Land Registry data combined with EPCs indexed to the data date is sound and has been accepted at examination. As a further check the Land Registry/EPC data has been reviewed using C&W method with no indexing looking over the past three years – the areas with the most development are used for the comparison: Lancaster - the testing used £2,550/sqm for detached and semi homes, using the C&W method the figure is £2,556 for detached and £2,542 for a semi. Carnforth the testing used £2,500 for a detached and £2,300 for a semi, using the C&W method a detached is £2,492 and a semi is £2,361. Clearly these figures are very similar so the approach of indexing does not exaggerate the values. | No |
| 478 | _020c/06 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | The limited weight that has been applied to price inflation is supported. | Noted | No |
| 479 | _006/15 & _007b/15 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | The LPVA21 does not acknowledge incentives. Incentives are used locally but details cannot be provided as they are confidential. They can be anything from 0% to 12% per plot of average selling price. | Incentives are part of the 3% sales and marketing costs allowance. This splits 1% agents, 0.5% legal and 1.5% marketing costs (which include incentives), equivalent to £3,557 incentive for a semi-detached house in Lancaster. This is more than adequate to cover the types of incentives mentioned. Three Dragons’ keeps under review area-wide viability studies for local plans and CIL that have been found sound. These show that incentive allowances are not being used in area-wide viability studies. | No |
| 480 | _006/16 & _007b/16 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | Further information is sought as to how secondhand properties have been uplifted in those areas where there were limited new build transactions to inform values. They also contradict their earlier statements by suggesting that the use of recent data may not be appropriate. | The use of secondhand data with an uplift has been necessary in the rural areas - Rural East (terrace, semi and flats), Forest of Bowland (all property types) and Arnside and Silverdale (all property types). It should be noted as set out in para 3.7 of LPRVA21 that there is very limited development expected in these areas and therefore any concerns need to be considered within this context. As explained in Appendix B (page 29) where there have been less than 10 transactions for new build properties the existing secondhand stock sales have been reviewed and premium applied to reflect the higher prices that new build attracts over existing secondhand stock. The uplift is based on the difference between average £/sqm for all stock and the £/sqm for new build within each value area. The £/sqm are | No |

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|---|--------------------|---------------------------------|---|----------------------|---------|--------|------|----------------------------------|---|---|----------------|
| | | | | | | | | | | calculated from the same timeframes and method as the new build as described in LPVA21 and within this response. This explanation was circulated as part of the workshop notes and agents and developers were given a previous opportunity to comment but chose not to at the time. | |
| 481 | _006/17 & _007b/17 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | Insufficient information is provided on asking prices currently (at time of report) being marketed. | The examples in table 5.6 of LPVA21 have scheme names clearly labelled. | No |
| 482 | _006/18 & _007b/18 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | The sales values are considered to be too high and unevidenced. | The approach to values is clearly set out in the LPRVA21 report and is a method that has been found sound elsewhere. PPG is clear (Para011 Ref ID: 10-011-20180724) that ‘for broad are-wide or site typology assessment at the plan making stage, average figures can be used’ – this is precisely the approach taken and as set out earlier. Average house prices £/sqm for different unit types are used by value area and applied to the testing. These value areas were previously found sound and no evidence has been provided during or after the development industry workshop to suggest that they were not appropriate. The value areas were shared and explained at the workshop and are shown in Figure 3.1 (as well as in the workshop notes). No alternative value areas have been suggested. | No |
| 483 | _020c/07 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | Further information is provided in respect of the ward-based value data fits the study value areas. | See above and the LPVA Addendum Nov 2021. | No |
| 484 | _006/19 & _007b/19 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | The detailed information from all the contacted RPs that has been used to inform the affordable housing values should be provided. C&W have then provided a set of their own transfer values, although they do make clear they have anonymised the details on the basis of confidentiality. Also, whilst provided as transfer values, it is not clear what they are a percentage of as this is not included so comparison is not possible. C&W also comment about whether national changes to the Shared Ownership model have been taken into account and that Shared Ownership should reflect the value areas. | Transfer values used in LPVA21 were based on confidential discussions with the five housing associations most active in Lancaster in March 2021. Housing Associations compete with each other for s106 housing and are unwilling to disclose bids in an open forum. We note that C&W acknowledge that details of transfer values they have sourced were also provided on a confidential basis. We do not think it reasonable to disclose information given on a similar confidential basis. In relation to the values used for <u>Affordable Rent</u> these are linked to the LHA rates which are relatively static compared to market sales values and so these will form a different percentage of market values depending on the market values in that market. Note also that some (it is not stated how many or which) of the transfer values provided by C&W are for the Wyre Council area, rather than Lancaster. Wyre Council is in a different BRMA than most of Lancaster. It is also not clear whether C&W have included transfer values relevant to social rented or Affordable Rent. For <u>shared ownership</u> , interviews undertaken with the housing associations took into account the implications of the new model of shared ownership. Transfer values used in LPRVA21 are within the range set out in the C&W representation. Shared ownership transfer values used in LPRVA21 vary by market value area which reflects differences in the market values. | No |
| 485 | _020c/08 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | Shared ownership values are applied at 70% of market value. This is a peak value. It is considered that a reduction to 65% on market value should be adopted, which is in line with their experience of offers from registered providers of affordable housing. The VA confirms that affordable rent values are in line with a survey of local registered providers, but no details of the survey responses or supporting transactional evidence are provided. This lack of transparency conflicts with PPGV requirements and Peel request that anonymised survey responses are provided so that the review of the Council’s evidence can be completed on a fully informed basis. | See above. | No |
| 486 | _002b/03 | Laura Mackay | Roger Hannah Ltd on behalf of Taylor Wimpey | Viability Assessment | | | | General Comment | It is unclear whether the house prices reflect the value area that the strategic sites fall in or if specific values have been used. | The strategic sites tested in LPRVA21 use the same house prices as the other typologies in the relevant value area. For Res8 (North Lancaster) these are the Lancaster value area house prices. | No |
| 487 | _006/20 & _007b/20 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | The use of varied build costs for different sized schemes with the use of LQ rates for the largest sites is supported, but the 1-5 unit schemes should have a 13% higher build cost and that 6-9 units should have a 6% higher build cost. The 2015 BCIS report undertaken for the FSB3 is referred to. Dwellings in higher house price areas should have higher build costs and that the BCIS rates should be split by house type rather than using the general rates for housing. | Lower build costs are suitable for larger sites and this is confirmed by cost consultants. However, the 2015 BCIS report presents costs grouped into different size bands with single dwellings, 1-5 dwellings, 1-10 dwellings and over 10 dwellings. Because BCIS also present the sample size in Table 2 of the report it is possible to disaggregate the size bands and this clearly shows that the majority of the higher build costs seen on smaller sites is for single dwellings. As a percentage of the mean, the build costs for different size sites are: <ul style="list-style-type: none"> 1 dwg - 153% 2-5 dwgs – 105% 6-10 dwgs – 96% >10 dwgs – 92% BCIS explicitly confirmed to Three Dragons in September 2015 that this interpretation was correct. Therefore it would be inappropriate to use the build cost premiums suggested. Subsequently, Three Dragons commissioned a further size breakdown from BCIS making use of public and non-public BCIS case studies and this assisted in setting the proportions of the BCIS mean used in the viability testing. The Three Dragons assessment uses separate build costs for houses and flats. Based on the information from BCIS the same economies of scale are not applied to flats, as height has a more significant impact on costs than scale. For non-flat dwellings, the general house build costs cover the range of house types and value areas in Lancaster without the need to make specific adjustment, which is a reasonable approach for area wide viability studies based on generic typologies. PPG states that average costs can be used as part of a typology approach (Paragraph: 004 Reference ID: 10-004-20190509). The Three Dragons approach to house build costs is compliant with this. We note that the 2018 Local Plan Viability work also used a sliding scale for build costs (see Figure 58 in the LSH Part 1 report page 103), with the highest costs for | No |

³ Housing development: the economics of small sites – the effect of project size on the cost of housing construction (BCIS, 2015)

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| | | | | | | | | | | single dwellings and then a sharp fall for small sites and then further decreases as site size increased. While there was reference to LQ the report is not specific about the relationship to BCIS mean. | |
| 488 | _020c/09 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | Reduction in build costs for larger schemes is appropriate only in the circumstances where there is certainty that a national PLC housebuilder, with the commensurate buying power, will construct the largest schemes and where Local Plan policies do not set additional standards beyond building regulations upon new development. The lower quartile cost that are adopted is extremely low, and not in line with developer expectations. It is be expected that schemes of 101-250 dwellings would be constructed by either regional or national house builders, and the “Estate Housing mean 89%” costs that are applied to schemes of this scale are regarded as being in line with current cost expectations, especially considering the significant materials cost increases that have been impacting on the construction industry during recent months. It is considered that the Council should revise the construction costs for the 251+ dwelling schemes used in appraisal to either to the same level as the 101-250 dwelling schemes or current BCIS lower quartile levels in order to ensure that an appropriate level of costs is applied, as the current cost rates are regarded as undeliverable. | See above regarding use of the Lower Quartile BCIS. It is not unreasonable to assume that the majority of the developers building out the largest sites will be volume housebuilders who are able to achieve economies of scale. | No |
| 489 | _002b/04 | Laura Mackay | Roger Hannah Ltd on behalf of Taylor Wimpey | Viability Assessment | | | | General Comment | It is not appropriate to use lower quartile BCIS dwelling build costs. | See above regarding Lower Quartile. | No |
| 490 | _006/21 & _007b/21 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | It is suggested that external works/site infrastructure should be between £16,000 to £38,000 per plot and separately, £25,000 per plot. Connection costs of £3,000 per dwelling should also be included. | The allowances for site costs in the viability study include a percentage for externals and site infrastructure, with additional allowances for further site infrastructure costs on large sites (para 5.22 and table 10). Between them, the allowances cover costs associated with the plot (excluding garages which are costed separately), standard estate roads, utilities, drainage, lighting and incidental landscaping. For smaller sites this is simply expressed as 15% of dwelling build cost and for larger sites this is a combination of 10% of dwelling build costs plus a separate allowance of £5,000-£26,000/dwelling to reflect the additional costs for larger sites – see report table 5.10. These allowances are based upon experience across England; are informed by the Harman guidance, include utility connections; were tested at the development industry workshop; and are reasonable for this typology-based area-wide viability work. Based on these allowances, a three-bedroom semi of 84 sq m on a greenfield development of 150 units would have external works costs of £9,114 (£1,085/sqm x 84 sqm x 10%), plus site infrastructure costs of £10,000/dwelling and EVC of £865/dwelling. A garage adds another £7,700 and biodiversity £1,137 per dwelling (brownfield would be £242/dwelling). Taken together this would be £28,816/dwelling (or £27,921 if brownfield). These costs will be higher on the largest sites and lower on smaller sites and will vary by dwelling type and are considered reasonable. This level of costs has been found sound in other examinations (such as the East Devon CIL in 2020 and the Canterbury CIL 2019) and has also fitted within the range of site costs suggested by other development consultancies such as Savills. It is not clear whether the external works/infrastructure costs presented by C&W are intended to be considered as alternatives or whether they are intended to be cumulative, as the definition of what is included within the various sets of figures is opaque. If they are intended to be cumulative then this totals £49,000 per dwelling (£21k+£3k+£25k) which seems to be implausibly high as an average for a set of standard development sites i.e. they would be 54% of the three-bed semi build cost of £91,140 in the example above, which is outside normal ranges by some margin. However, if they are alternatives then the cost allowances made by Three Dragons are comparable. There may be specific sites which have higher site infrastructure or other costs than allowed for here. In these circumstances we would expect that the site value would reflect these higher costs and that the price would vary accordingly. We note that the previous viability study for Lancaster just used 10%-20% of dwelling build costs without any further allowances for additional site infrastructure and no further allowance for garages, biodiversity or electric vehicle charging (although there was an allowance of £25k/ha for brownfield site clearance). The Three Dragons external works/site infrastructure allowances are generally more generous than the allowances made in this 2018 Local Plan viability work. | No |
| 491 | _020c/10 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | The level of contingency and plot/external/site costs applied are too low. It is not clear which cost items are covered in the additional/exceptional costs therefore there is a lack of transparency. | See above. | No |
| 492 | _002b/05 | Laura Mackay | Roger Hannah Ltd on behalf of Taylor Wimpey | Viability Assessment | | | | General Comment | Higher site costs for larger developments are accepted but the detailed costs for the North Lancaster allocation are unknown at this stage. | Noted | No |
| 493 | _006/22 & _007b/22 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | 5% should be allowed for contingency. | Contingency is included in the VA but this is not strictly necessary for area wide viability (PPG Paragraph: 012 Reference ID: 10-012-20180724). The allowance is c.3% of base build costs and is within the wider allowances made in addition to base build costs. | No |
| 494 | _002b/06 | Laura Mackay | Roger Hannah Ltd on behalf of Taylor Wimpey | Viability Assessment | | | | | 5% contingency should be included. | See above | |
| 495 | _006/23 & _007b/23 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | Concerns are raised that allowances for CIL liability for garages, as well as integrated and double garages are not correctly included. | The viability assessments explicitly include allowances for garages on 20% of all dwellings (para 5.22) and the 18 sq m floorspace/garage is allowed for in the CIL calculations. This is a reasonable approach for area wide viability testing where varied provision with of different types of garage and car port provision may be made in practice on individual sites. | No |
| 496 | _006/24 & _007b/24 | Derek Nesbitt & Hannah Gradwell | Cushman Wakefield (Consort) | Viability Assessment | | | | General Comment | The allowance for garages is insufficient and that affordable houses should have garages. | See above. Affordable housing normally does not have garages. | No |

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| 497 | _020c/11 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | Consider the allowance for garages as the minimum for a single garage, some properties will include double garages. | See above. | No |
| 498 | _002b/07 | Laura Mackay | Roger Hannah Ltd on behalf of Taylor Wimpey | Viability Assessment | | | | General Comment | The cost allowance for garages is reasonable but that this should be on more than 20% of dwellings. | Garages on 20% of dwellings is based on a review of recent applications and was tested at the development industry workshop. | No |
| 499 | _020c/12 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | The % of homes with garages should be higher to reflect the % of 4 bed units in Res8 & Res9 and affordable houses should have garages. | Garages on 20% of dwellings is based on a review of recent applications and was tested at the development industry workshop. | No |
| 500 | _006/25 & _007b/25 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | C&W itemise a variety of standard development costs, with the suggestion that a cost consultant is used and that garages are costed separately. | It is not clear how this list may be used in area-wide viability testing using a typology approach. BCIS is a standard source for estimating dwelling build costs. However, BCIS build costs used in the testing already include some of the costs listed by C&W, such as those covering substructure, walls, roof and prelims; and other costs such as plot costs are part of external works. Separate allowances for these items are not necessary. Garages are explicitly included in the viability testing (para 5.22). | No |
| 501 | _006/26 & _007b/26 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | It is acknowledged that a viability study is at a point in time but concerns are raised with regard to cost inflation. | The issue of changing costs and values is dealt with in the viability study in chapter 8, with a review of trends (Figure 8.1) and some sensitivity testing (Figure 8.2). This shows that while in the short term there can be changes in the relationship between costs and values, over the longer-term values consistently have risen more than costs. | No |
| 502 | _020c/13 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | Unexplained costs of £3,044,046 have been added to the build costs for Res9, based on the dwelling build costs from the summary appraisal in Appendix K.. | The summary appraisals shown in Appendix K are the total blended dwelling build costs. Res9 includes flats as well as houses and these have a different build cost. | No |
| 503 | _006/27 & _007b/27 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | Varying professional fees by site size is supported; however 6% for the larger sites to be too low and it is suggested that this should instead be set at 8%. | Fees for larger sites have been developed in discussion with cost consultants and discussed at the workshop. We also note that professional fee allowances in other area wide viability studies found sound varied between 4% and 12% (see Appendix H of LPVA21) and that the allowances in LPRVA21 are within this range. | No |
| 504 | _020c/14 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | Professional fees should be applied to exceptional development costs. It is not clear how these costs are defined. A 6% allowance is insufficient and it should be increased is 8%. | Exceptional development costs are itemised below in the response to _006/37 & _007b/37. These include some items that would not attract professional fees such as land purchase (separate allowances are made for agents and legal); as well as some items where broad allowances for site costs already include professional fees. See above for levels of professional fees. | No |
| 505 | _006/28 & _007b/28 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | <p>Object to the use of 17.5% GDV for developer return for market housing and 6% return for affordable housing and that there is no evidence to justify this assumption. The representation cites several reasons as to why 20% should be the minimum acceptable return for medium and larger schemes:</p> <ul style="list-style-type: none"> The studies set out in Appendix K average out a figure higher than 17.5% and are mainly in stronger housing markets A very selective range of studies supporting CIL/Local Plan and planning appeals are all at 20% GDV (market) Further selective range of ‘northern’ studies which all show 20% GDV (market) Covid-19 and support measures are scheduled to finish and there is speculation as to whether the market is set for a price correction – all this uncertainty makes development more risky and requires a higher profit. Help to Buy reforms present a greater risk Developers do not distinguish between the market and affordable housing and most do not accept anything less than 20% blended across both tenures –a selective list of studies where 20% for affordable housing is used has been provided. | <p>On developer return – from 2018, the PPG has indicated a range of 15%-20% of gross development value, “.....may be considered a suitable return to developers in order to establish the viability of plan policies” with a lower return for affordable housing that may be considered appropriate. (see PPG Viability – Para 018 Reference ID: 10-018-20190509). The pattern of housing delivery and the general house values in Lancaster do not suggest that development is particularly risky and should be at the higher end of the PPG range.</p> <p>Studies undertaken before the PPG changes in 2018 are of limited use, which will include many of the examples presented by C&W.</p> <p>The example studies quoted by C&W are a partial view of the studies found sound at examination (i.e. they have only show ones using 20%). The more comprehensive list (most recent in terms of Examination Reports at time of report) presented by Three Dragons in LPRVA21 Appendix H shows that there was a range between 17.5% and 20% and that some studies used a percentage on cost rather than GDV. None exceeded 20% and in the majority of studies those at 20% were published prior to changes in PPG which suggest the 15% to 20% range as being suitable. This is clearly mentioned in the Appendix. Appeal decisions are of limited use in this context, especially those dating back to 2013.</p> <p>Despite the assertions that 20% is the minimum acceptable return it is worth noting the data from the recently published Housing Market Intelligence Report (HBF in partnership with NHBC, 2021) of the top 75 housebuilder (by turnover). These include a number of those mentioned by C&W on the front page of their representation. The data shows that shows that during the pandemic profits were on average around 12.1% of turnover, compared to 17.6% pre pandemic – however despite the drop in profit the companies continue to trade and develop.</p> <p>We also note that research undertaken by RICS (Performance metrics, required returns and achieved returns for UK real estate development, 2019) states that “a figure of 20% profit on costs was mentioned regularly for sites without significant risks”; that “These levels of profit on cost imply a profit on gross development value (GDV) of around 15 to 20%” and that “The larger developers, utilising cash-flow techniques and developing longer schemes, quoted target rates of return of around 10 to 12%,...”.</p> <p>House prices in Lancaster plus the evidence of past delivery (with LCC reporting that the number of completions have on average been above plan target over the past 5 years) suggest that it is a strong market and there is no evidence to suggest that it is weak or unusually risky. The issues relating to changing values and costs are considered in Chapter 8. Figure 8.1 in the main report demonstrates house</p> | No |

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| | | | | | | | | | | prices have been increasing; and Table 8.2 sensitivity testing indicates that viability improves if trends continue. The approach taken to the house prices in the viability study has been careful to avoid taking the peak of Covid house price rises (para 5.7). As C&W note, with values over the Help to Buy threshold the withdrawal of the scheme will have limited impact. In addition, the Government remains committed to home ownership and Help to Buy is being replaced by the new mortgage guarantee scheme in order to boost new entrants to the housing market. C&W suggest that 20% return is required for affordable housing. This takes no account of the lower risk for affordable housing pre-sold to housing associations and is not compliant with PPG (para 10-018-20190509). In area wide viability studies considered sound the most common return for affordable housing is 6%, although the approach varies 0% and 20%. In addition, the Fylde study quoted by C&W notes (para 5.48) that 20% return is too high in relation to PPG. | |
| 506 | _020c/15 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | A 20% return on market housing and 8% on affordable housing are a minimum requirement to meet shareholder and funder expectations. | See above. | No |
| 507 | _020c/16 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | The appraisals include “Total Operating Profit”, “Gross Residual Value” and “Net Residual Value” headings and associated results. Each of these headings is regarded as misleading, as the actual assessed level of profit and land value are not included within the appraisal, meaning that the Total Operating Profit is assess BLV used prior to the deduction of land value and, therefore, the Gross and Net Residual Land Values are significantly inflated in comparison to the actual assessed land value. It is considered that, for transparency, the appraisal should be restructured to clearly state the level of assessed developer profit and the resultant Gross and Net (after purchaser costs) Residual Land Values. | The developer return is clearly stated in Appendix J in LPRVA21. | No |
| 508 | _012a/03 | Matthew Symons | Hollins Strategic Land | Viability Assessment | | | | General Comment | 17.5% developer return on market and 6% on affordable is too low. | See above. | No |
| 509 | _002b/08 | Laura Mackay | Roger Hannah Ltd on behalf of Taylor Wimpey | Viability Assessment | | | | | A return of 17% of GDV on market housing and 6% of GDV on affordable housing is too low; and that this gives a blended rate that is below the PPG guideline as well as being below the target rates in plc housebuilders company accounts. | See above. | |
| 510 | _006/29 & _007b/29 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | 6% for finance is too low and that 7% would be more appropriate. | 6% is a commonly used finance rate in area wide viability studies. It is a generous allowance in the light of the Homes England Home Building Fund which makes finance available to developers at lower rates than this. There was discussion at the workshop about proposed 5.35% finance rate and the rate was revised to a more generous 6% in response. | No |
| 511 | _006/30 & _007b/30 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | Support the sales and marketing costs. However, they question as to whether the separate allowance for affordable housing legal fees (£500 per affordable dwelling) has been included within the testing. | The legal costs for affordable housing are with the exceptional development costs within the appraisal summaries in Appendix K. See response to 6.306 for further detail. | No |
| 512 | _020c/17 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | Thhe marketing, legal and sales costs are insufficient and an additional £650 legal costs should be added. | 3% allowance is considered appropriate and is within range for area wide viability appraisals. | No |
| 513 | _006/31 & _007b/31 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | Developer return for First Homes should match the market housing. | Locally discount market housing has used the same approach when tested. As First Homes is a new and untested product it was considered reasonable to use examples of the closest type of product i.e. discount market housing to help inform the assessment. | No |
| 514 | _006/32 & _007b/32 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | The use of the government impact assessment on Biodiversity Net Gain to provide costs is supported, however the figures should be indexed to adjust for any inflation. | It is not clear that applying an indexation to this broad allowance would be appropriate as it is based upon a blend of on and offsite measures. In addition, more recent work e.g. NHBC/Barratt Developments with RSPB (Biodiversity in new housing developments: creating wildlife-friendly communities, 2021) suggests that achieving BNG as set out in the Environment Bill can be achieved in more cost-effective ways than originally suggested in the Impact Assessment, meaning that the unadjusted allowance may be already generous in most circumstances. | No |
| 515 | _006/33 & _007b/33 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | It is questioned whether the draft policy has been applied to the testing in terms of EV charging points. Implementation could be challenging because of the distribution network operators potentially restricting their use due to grid capacity. | Based on the MHCLG impact assessment, the viability testing described in LPVA21 uses an allowance of £865 for all dwellings likely to have their own on plot parking place (3+ bed houses). Further allowances are made for smaller dwellings of a charger for every two dwellings. This takes into account a mixture of on plot charging points and communal charging points. This approach is consistent with the numbers required by the policy, which refers to one charging unit for a dwelling with an associated space and 20% of communal spaces. Electricity infrastructure across the district is outside the scope of this study. However, part of the intention behind a fabric first approach is to reduce the power load on the grid which will reduce the amount of reinforcement necessary, as well as smart grid technology solutions aimed at smoothing peak demand. | No |
| 516 | _10/23 | Peter Dutton | Gladman | Viability Assessment | | | | General Comment | The electric vehicle charging policy requirements should be based upon up to date and accurate costs information, including potential requirements to upgrade or reinforce supporting electrical supply information. | See above. | No |
| 517 | _006/34 & _007b/34 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | Full details of all the past S106 agreements that have helped inform the rates used within the testing should be provided. The also object to the use of an average figure for strategic viability testing as s106 will vary site to site. | The level of s106 was discussed at the workshop and, in response to comments made, further information was provided by the Council on pending s106 agreements for sites up to 95 dwellings and between 95 and 250 dwellings. With the exception of one large scheme (some way in excess of the largest generic typology used in the testing) the average s106/dwelling was £4,400 (See LPVA21 para 5.29) with little difference on a per dwelling basis between the smaller and larger categories. Indicative s106 requirements (based upon the IDS) for the two allocated sites are set out in para 5.30 (£6,561 and £6,830 per dwelling) and these were used in the testing. | No |
| 518 | _006/35 & _007b/35 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | Further information is requested regarding how the costs for meeting policy towards improved building standards have been derived. They consider that the costs used maybe too low and should not be adjusted to reflect the scale of development. They do support the inclusion of a staged approach to implementing the policy. They consider that more consultation should be undertaken on this matter. | As set out in LPVA21 paras 5.37 – 5.38, the approach to testing the impact of varying building standards is to use a percentage uplift on build costs. These uplifts are based on cost information set out in Appendix A. | No |

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| | | | | | | | | | | <p>The approach used within the viability assessment was to review the impact of additional costs associated with varying standards, which themselves have a varying effect on reducing operational CO₂.</p> <p>Page 11 & 55 Appendix A illustrates the effect each standard has on reducing CO₂. Page 14 – 23 Appendix A show how each standard can be achieved technically – this information is used by the cost consultants to provide costs for meeting the standards.</p> <p>Page 81 Appendix B provides a breakdown by dwelling type of the cost of moving towards each standard. The detail of these breakdowns by unit type are set out in pages 82 to 100. The figures set out on page 81 also provide a size of unit to which they relate – this enables a conversion of the unit cost to cost/sqm.</p> <p>An example of the calculation undertaken is as follows:</p> <ol style="list-style-type: none"> On page 81 the cost uplift to move from current regs (Part L 2013) to Part L 2021 is £3,300 for a terrace house of 75sqm This equates to £44/sqm The BCIS build cost (10 to 50 units) is £1,085 Therefore, the Part L 2021 standard uplift represents a 4% increase in base build cost. This same approach is repeated for all unit types and standards. <p>There was only limited variance across unit types, with flats generally slightly lower than houses in terms of the parentage uplift. Therefore, in the spirit of PPG guidance in terms of using average figures the percentage was set at the same figure across all the unit types and scheme sizes within each standard – as set out in para 5.38 LPRVA21. This also means that for smaller sites the cost per unit for moving to the standard is higher than for larger sites as it is a percentage applied to the build cost, which varies according to site size. As these changes are around build cost and therefore should benefit from the same economies of scale etc, it is considered an appropriate approach.</p> <p>A question was raised regarding how the solar element had been calculated for the Passivhaus+ standard. This is taken from the figures presented on page 91 of Appendix A, which state that a 3kw PV system would be £4,000 for 114sqm dwelling. This equates to £35/sqm, which is used within the testing.</p> <p>To help understanding of the variance between the differing costs of the building standards the costs are shown separately in the results sheets (column 12) for the testing in Appendix J. These include the total uplift for each typology, including an allowance for cashflow, which is calculated at the same rate and pace of development as the rest of the modelling for each typology.</p> <p>It should be noted that an additional technical workshop for housebuilders providing further implementation information for this policy on improving building standards was undertaken.</p> <p>The information is also collated in the LPVA Addendum Nov 2021.</p> | |
| 519 | _020c/18 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | Clarity regarding the building standards additional costs is requested. | See above. | No |
| 520 | _020c/19 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | Clarification about the s106 amounts used in the Res9 model is requested. | The planning obligations cost referred to by CBRE includes the s106 for Res9 of £6,813 per dwelling, which totals 6,336,090; plus the cost of PartM4(2) of £1,400 per dwelling across 20% of dwellings, totalling £260,400. This arrives at the total referred to by CBRE of £6,596,490. | No |
| 521 | _002b/09 | Laura Mackay | Roger Hannah on behalf of Taylor Wimpey | Viability Assessment | | | | General Comment | It is unclear where the S106 are derived from and are considered too low. | The S106 costs used are derived from the Infrastructure Delivery Schedule and based on those used as evidence to support the adopted Local Plan and the allocation of the site. | No |
| 522 | _012a/04 | Matthew Symons | Hollins Strategic Land | Viability Assessment | | | | General Comment | No allowances are made for abnormal costs. | LPRVA21 includes allowances for standard development costs. PPG para 12 states that abnormal costs should be taken into account when defining benchmark land value and therefore LPRVA21 BLVs would need to be adjusted on a site-specific basis to accommodate abnormal costs associated with specific constraints. | No |
| 523 | _006/36 & _007b/36 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | C&W have undertaken their own appraisals to compare the finance costs. These are for typology RES3 and RES7. The appraisals produced by C&W suggest that the finance charges should be higher. An industry S1ecognized model such as Argus Developer should be used. | <p>Differences in finance costs will depend on the assumptions about when values and costs are incurred.</p> <p>It would appear from the C&W appraisals that the incorrect land values have been used in both of their assessments. The C&W assessments double count both the land and the land acquisition costs.</p> <p>In terms of the cashflow, revenue has been pushed back in both appraisals. The overall development period in both appraisals is also longer.</p> <p>It should be noted that Three Dragons load a greater proportion of the exceptional development costs to the beginning of development period, showing a more conservative approach. Both C&W and Three Dragons in the two appraisals cashflow the land purchase at the outset.</p> <p>C&W have not included the additional finance costs allowed for building standards testing. These costs are included the LPRVA21Technical Appendix J.</p> <p>Argus is one of a number of propriety models and that Three Dragons model has been used for many years across numerous plan and CIL viability studies which have been found sound.</p> | No |
| 524 | _006/37 & _007b/37 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | <p>Land payments maybe incorrect.</p> <p>It is agreed that it is correct to defer land payments on larger sites, though they disagree as to how they have been deferred.</p> <p>Further detail regarding the costs identified as Exceptional development costs in the appraisal summaries in LPVA21 Technical Appendix K is requested.</p> <p>C&W disagree with the sales rates used for sites in excess of 100 dwellings. Although they are not clear in the commentary as to whether they are including the affordable housing.</p> | <p>We confirm that land purchase has finance applied from the beginning of the first year and beyond. All the generic case studies (up to and including 150 dwellings) have the land purchase in year 1.</p> <p>The 700 dwelling case study has land purchase in year 1 and year 5 out of a 10-year development period, and the 900 dwelling case study has land purchase in year 1 and year 7 out of a 15-year development period. These are reasonable assumptions for this high level testing. Where land payments are required further upfront on a development specific basis, this can be offset by a lower amount being paid to reflect the greater finance cost.</p> <p>Within the Three Dragon’s modelling a range of development costs are summarised within the exceptional development costs label – for the modelling in Lancaster this includes:</p> | No |

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| | | | | | | | | | | <ul style="list-style-type: none"> - Additional site infrastructure costs (para 5.22 & table 5.10 LPRVA21) - EV charging (para 5.27 & table 5.10 LPVA21) - Garages (para 5.22 & table 5.10) - Affordable housing legal fees (table 5.10) - Land and land acquisition costs (table 5.11 & table 5.10) <p>Whilst the exceptional costs are grouped within the summary appraisal sheet in Appendix K LPRVA21, they are all individually cash flowed. Within this land and additional site costs are front loaded while the EV charging, garages and affordable housing legal fees relate to the delivery of the dwellings. The assumptions about two outlets are applied to the 150 dwelling generic typology and will include affordable as well as market housing – note for example in Lancaster a scheme of 150 units will have 2.8 market dwellings and 1.2 affordable dwellings per month, which is not unreasonable. The sales rates of 4 dwellings <i>across all tenures</i> per month is conservative in most markets for schemes of 150 dwellings and 2 per month is very low in most markets. For the strategic sites we test at around one market dwelling a week to reflect the larger size of these schemes. Please note in para 5.41 there is a typo and the first sentence should read “There is a lead in time prior to starting construction with first sales at nine months.”</p> | |
| 525 | _020c/20 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | An explanation about the items included in the exceptional development cost heading is sought. | See above. | No |
| 526 | _020c/21 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | The limited sales rates are regarded as acceptable. It is requested that the programmes used for scheme appraisals are published transparently. | Comments on sales rates noted. The delivery programmes are included in the LPVA Addendum 2021. | No |
| 527 | _002b/10 | Laura Mackay | Roger Hannah Ltd on behalf of Taylor Wimpey | Viability Assessment | | | | General Comment | Concern is raised about the phasing of Res8 and the impact of initial capital outlay on viability. | LVPRVA21 makes reasonable assumptions about time to first sale and delivery rates as set out above. | No |
| 528 | _006/38 & _007b/38 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | Concern are expressed that the VA departs from the benchmark land values found sound in 2020. | The LSH viability study used for the local plan was undertaken before the 2018 changes to PPG and the LSH benchmark land values (BLVs) were determined in relation to ‘market values’ rather than the existing use plus a premium now required by PPG (EUV+). Three Dragons approach to BLVs is based up EUV+, which is compliant with PPG. The LSH benchmarks are set out per net site area whilst the benchmarks in the Three Dragons work are for the whole site area (gross). Because the LSH typologies quite naturally have different net to gross ratios the benchmarks for the whole site will vary by typology. Furthermore, LSH state that these benchmarks may be reduced if costs are higher (eg Part 2 report para 2.9). C&W state that the strategic greenfield BLVs in the LSH work were between £297k/ha and £445k/ha gross whereas they are between £297k/ha and £408k/ha gross. The issue relates to the Lancaster strategic site benchmark of £680k/net ha for a site with 60% net to gross. Despite all of this, the benchmarks are not entirely dissimilar, with Three Dragons using higher greenfield BLVs than LSH for some smaller sites, but lower BLVs for strategic sites. The higher allowances made in the Three Dragons testing for site infrastructure on larger sites than the 20% on cost in the LSH work will be part of the consideration of lower BLVs for larger sites, as well as the use of EUV+. | No |
| | | | | | | | | | | LSH strategic greenfield £/gross ha | Three Dragons large greenfield £/gross ha |
| | | | | | | | | | | £297,000-£408,000 | £181,000-£362,000 |
| | | | | | | | | | | LSH small greenfield | Three Dragons small greenfield |
| | | | | | | | | | | £371,000-£892,000 | £392,000-£784,000 |
| | | | | | | | | | | LSH Brownfield | Three Dragons brownfield |
| | | | | | | | | | | £297,000-£1,260,000 | £249,000-£1,125,000 |
| 529 | _002b/11 | Laura Mackay | Roger Hannah Ltd on behalf of Taylor Wimpey | Viability Assessment | | | | General Comment | The LPRVA21 BLVs are inconsistent with market evidence as set out in the 2018 Local Plan viability evidence base. | See above. | No |
| 530 | _020c/22 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | The BLVs are lower than used in the local plan examination and that they should be higher. In particular the BLV for Bailrigg should be higher than £309,000 per gross ha. | See above for comparison with Local Plan BLVs. BLV for Bailrigg will be considered in the AAP Viability Assessment.. | No |
| 531 | _020c/23 | Laura Miller | WSP for CBRE on behalf of | Viability Assessment | | | | General Comment | Clarity is sought on which Benchmark Land Values (BLVs) should be used to assess policy and the methodology use, it is not clear whether the BLVs are net or gross. | PPG is silent about the scale of the premium to be used although it does state that it is up to plan makers to establish a reasonable premium ⁴ and in this case the HCA | No |

⁴ Paragraph: 016 Reference ID: 10-016-20190509

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| | | | Peel L&P Investments | | | | | | | guidance ⁵ has been chosen to inform the process with 10%-30% premium for urban areas and 10-20 times EUV for greenfield. This approach has also been adopted in the sub-set of site-specific viability appraisals where BLV has been based on EUV+, and is common in area-wide viability studies for Local Plans and CIL across England. The recent RICS guidance ⁶ notes that there is no fixed minimum premium. The benchmarks presented are for strategic plan-wide testing but where a specific site has exceptionally high development costs or planning obligations it may be appropriate to use a lower premium than the range described here. BLVs are on gross area. | |
| 532 | _006/39 & _007b/39 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | The assessment of existing agricultural use and the corresponding greenfield benchmark land value are too low. The examples used are not apparent and a minimum of £27,200/ha (£11,000/acre) should be used as agricultural value. | A balanced view of agricultural and other greenfield land values has been taken and distinction made between lower value agricultural use (£18,100/ha) and higher value sites with amenity/equestrian/paddock use £39,200/ha) – See Appendix I in the CCLPR Technical Appendices May 2021. This includes consideration of a number of different sources including land for sale, commentary from Carter Jonas, Strutt & Parker and Knight Frank, MHCLG and site-specific viability assessments. The example sales in the C&W appendix 5 include both large and small parcels of land and it is not clear whether this is meant to inform the discussion about paddock use as well as agricultural use – particularly as the smaller parcels quoted by C&W generally have higher values than the larger ones. If it is intended to cover higher value greenfield sites, then the suggested C&W £27,200/ha fits within the £18,100-£39,200/ha range used by Three Dragons. We note that one of the example sales quoted by C&W in their Appendix 5 (5.2ha at Lupton) was also part of the evidence base for a site-specific viability assessment but with a different value (£120,000 compared to the £130,000 in the C&W evidence), which raises questions about reliability. We note from the same site-specific viability appraisal that a further 3.1ha was also sold at the same location at the same time with a lower £/ha and it is interesting that this is not included in the C&W comparators. Carter Jonas and Strutt & Parker considered that arable land in the North/NW was worth £22k-£23.5k/ha for arable and £15.5-£16.7k/ha for pasture (Q3/Q4 2019). The Three Dragons estimate of £18,100/ha for general agricultural land is not unreasonable in this context, while the C&W suggestion of £27,200/ha is outside this range by some margin. Notwithstanding our disagreement with the suggested C&W greenfield value, even if some greenfield land had a higher existing use value, the greenfield BLVs used in the assessment would still be appropriate but the premium would be reduced. | No |
| 533 | _020c/24 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | The viability study should rely upon the RICS-RAU Farmland Market Directory of Land Sales Summary 2020 to inform its greenfield existing use values. It is considered that the BMLVs should be revised to reflect the RICS/RAU data (reflecting comprehensive market data), and landowner’s reasonable expectations and actual transactional evidence. | It is noted that the data behind the 2020 summary presented by CBRE has a sample of 2 transactions across the whole of Lancashire. The existing use value for large greenfield land used in the viability study fits within the range of these two transactions. The data used in the RICS-RAU directory splits agricultural values by size and region, and again the existing use value for large greenfield land used in the viability study fits within the range. Average values in the RICS-RAU directory include land with dwellings and other buildings (see Directory table 17) which may distort the averages compared to bare land. | No |
| 534 | _006/40 & _007b/40 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | The brownfield land existing use value is too low although it is acknowledged that there is little local transactional evidence and that existing uses can vary substantially in value. £432,400/ha is suggested for standard brownfield and £865,000 for higher brownfield existing use values. The brownfield EUV appraisal inputs are presented should be presented. | Three Dragons has taken a balanced view of brownfield existing use values, based upon MHCLG, an EUV appraisal, site-specific viability assessments and post-workshop discussion with agents. It is agreed that there is relatively little data and that EUVs can vary substantially, and the estimates in the LPVA of existing use values range between £249,000-£1,125,000/gross ha. The comparisons with higher value commercial sites are not necessarily relevant. It is more realistic to assume that only low-grade commercial sites are likely to come forward as housing sites as employment uses will be able to outbid residential development for prime commercial sites. For example the C&W Henry Boot comparison in Preston at £741,000/ha is described as a ‘thriving facility in a premier logistics location’ (https://hbd.co.uk/scheme/east-preston/) and it is clear that this type of site is not the ‘low grade’ commercial site discussed at the workshop that will likely be flipped to residential development. The brownfield benchmarks are similar to the spread of benchmarks used in the Local Plan Viability study and the suggested C&W EUVs fit within the range used by Three Dragons. The estimate of existing use appraisal is based upon £49/sq m at 11.08% yield on a 1 ha site with 5000 sq m of floorspace; £257 sq m refurbishment, 8% fees, 3% sales and marketing costs, 6% finance, 3 months refurbishment and 36 months void/rent free. | No |
| 535 | _006/41 & _007b/41 | Derek Nesbitt & Hannah Gradwell | Cushman & Wakefield on behalf of the Consortium & L&K Group | Viability Assessment | | | | General Comment | The premiums over existing use value are too low to incentivise landowners to release sites, with the danger that the assessment is at the margin of viability. C&W suggest that market values are used to estimate premiums. No alternative premium suggestions are made. | The approach to BLVs by is compliant with PPG. Estimates of existing use with a premium to incentivise release are used to estimate benchmarks, as required since 2018. Appendix I provides the detail of the approach used. PPG is silent about the scale of the premium to be used although it does state that it is up to plan makers to establish a reasonable premium ⁸ and in this case the HCA guidance ⁹ has been chosen to inform the process with 10%-30% premium for urban areas and 10-20 times EUV for greenfield. This approach has also been adopted in the sub-set of site-specific viability appraisals where BLV has been based on EUV+, and is common in area-wide viability studies for Local Plans and CIL | No |

⁵ Homes and Communities Agency, 2010, Annex 1 (Transparent Viability Assumptions)

⁶ RICS, 2021, Assessing viability in planning under the National Planning Policy Framework 2019 for England para 5.7.9.

⁷ <https://www.rics.org/globalassets/rics-website/media/knowledge/research/market-surveys/rics-~-rau-farmland-market-report-fy2020-final.pdf>

⁸ Paragraph: 016 Reference ID: 10-016-20190509

⁹ Homes and Communities Agency, 2010, Annex 1 (Transparent Viability Assumptions)

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| | | | | | | | | | | across England. The recent RICS guidance ¹⁰ notes that there is no fixed minimum premium. The testing uses a spread of BLVs which include premiums at either end of the HCA ranges. The BLVs including the premiums are an estimate of the minimum land value and in many cases where development is more viable sites will fetch more. This is why a reliance on market transactions is unreliable as inevitably it will see a circular increase in BLVs and a corresponding reduction in policy requirements to accommodate this, as noted in RICS research ¹¹ . The workshop discussion and the post workshop discussion with agents highlighted the issue with unrealistic landowner expectations, which often did not factor in changing national and local policy obligations. | |
| 536 | _002b/12 | Laura Mackay | Roger Hannah Ltd on behalf of Taylor Wimpey | Viability Assessment | | | | General Comment | The multiplier approach to premiums applied to EUV are problematic and that this reduce BLVs to an unreasonable level. | See above. | No |
| 537 | _020c/25 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | It is considered that land transaction evidence must be provided to enable the necessary cross check against the BMLVs to ensure that the BMLVs are in line with landowner expectations. | See above. | No |
| 538 | _020c/26 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | The total land values presented are not based on the benchmark land values per ha, based on the example of the Res9 typology of 930 dwellings with the middle BLV2. | The site area of 80 ha for Res9 is set out in table 4.1 (p21) LPRVA21 along with the other residential typologies. Para 4.56 states that dwelling numbers and developable area have been provided by the Council based on a masterplan accompanying the Statement of Common Ground for the allocation and further detail set out in Appendix D. This includes the gross residential area of 46.44ha and land that is unsuitable for development but within the site area (local landscape/habitat/incidental amenity space) of 33.56ha. These two areas of land have BLV applied as set out in Table 5.11 in LPRVA21 and explained further in Appendix I (pg78) LPRVA21 – in terms of Res9 BLV2 specifically this would be 46.5 x £272,000 and 33.6 x £22,000, which in total before any allowance for fee is £13,369,445 and with fees £14,261,882. CBRE in their calculations use the figure of £14.3m as their starting point as referenced above, which is correct. However, they have not made the calculations described above and in the report and therefore their calculation results in a much lower per hectare figure for the residential development element of the land value. | No |
| 539 | -012a/05 | Matthew Symons | Hollins Strategic Land | Viability Assessment | | | | General Comment | The SDLT calculation is based upon a VAT inclusive land cost. | Land is normally exempt from VAT. | No |
| 540 | _020c/27 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | The presentation of the viability findings is not consistent between generic smaller sites and the two larger typologies. They question why only BLV2 has been used in figure 6.16, this is inconsistent with the methodology. | All the typologies are shown in the same way across section 6 with different building standards and the spread of BLVs. In order to provide another perspective (see para 6.11 LPRVA21) a subset of the typologies are presented at 6.16 to show a comparison between the different building standards. | |
| 541 | _020c/28 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | General Comment | The figures in the results table for typology Res9 do not reflect the changing building standards costs. | In Appendix K page 97 LPRVA21 the second column within each of the BLV reporting has the baseline RV. The third column shows the residual value less the return and the building standards additional costs. This is the figure that is shown in LPRVA21 chapter 6. | No |
| 542 | _020c/29 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | | The results shown in VA Figure 8.2 appear erroneous, with significant increases in the residual value headroom, particularly in respect of the Res 8 GF and Res9 GF sites, with improvements in viability approaching £10-12 million. The adjustment to market and shared ownership values exceeds the construction cost adjustment by only 1.5% and such a variation is clearly incapable of generating the level of adjustment to the residual land values that are shown in the graph. It is considered that further details of the methodology adopted within the future time appraisals should be provided, and corrections must be made, where applicable. | Paras 8.6 and 8.7 in LPRVA21 make clear that these are <u>annual</u> increases, and it is therefore the cumulative effect of the changes that give rise to the improved viability by 2025. | No |
| 543 | _002b/13 | Laura Mackay | Roger Hannah Ltd on behalf of Taylor Wimpey | Viability Assessment | | | | | The use of graphs with headroom per dwelling in the main LPRVA21 report and the tables with RLV in the Appendices hard to interpret. | See Testing Input and Output Summary Example in the Appendix. | No |
| 544 | _020c/30 | Laura Miller | WSP for CBRE on behalf of Peel L&P Investments | Viability Assessment | | | | | There is a severe lack of transparency in respect of the supplied appraisals and results provided at VA Appendices J and K respectively. | All the information is available within the VA and various reports. | No |

¹⁰ RICS, 2021, Assessing viability in planning under the National Planning Policy Framework 2019 for England para 5.7.9.

¹¹ RICS, 2015, Financial Viability Appraisal in Planning Decisions: Theory and Practice