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# Developing a Local Plan for Lancaster District

Representations Statement  
(Regulation 22) (1) (c) (v-vi)

Shaping  
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## Contents

1. Introduction .....	3
2. The Representation Period .....	3
3. How Many Representations were Received? .....	3
4. Summary of the Main Issues Raised to the Strategic Policies and Land Allocation DPD .....	4
5. Summary of the Main Issues Raised to the Development Management DPD .....	5
Summary of the Representations (attached as a separate excel document)	

## 1. Introduction

- 1.1 This Representation Statement sets out and summarises representations received following formal Publication of the Climate Emergency Review of the Strategic Policies & Land Allocations Development Plan Document (DPD) and the Climate Emergency Review of the Development Management DPD (the Lancaster District Local Plan) which was formally published under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The formal representation period took place for a six-week period between 31 January 2022 to 14 March 2022. It explains how the Council have responded to the particular requirements of Regulation 22 (1) (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2 In accordance with Regulation 22 (1)(c) (v and vi) the purpose of this document is to set out:
- How many representations were made on the Publication of the two DPDs in accordance with Regulation 20; and
  - A summary of the main issues raised in those representations.
- 1.3 The Consultation Statement published by the Council alongside the two the DPDs in January 2022 provides details of how the council have satisfied the requirements of the Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations in 2012. In accordance with Regulation 22 (1) (c) (i-iv), the Consultation Statement sets out:
- Which bodies and persons the Council invited to make representations under Regulation 18 (1);
  - How these bodies and persons were invited to make representations under regulation 18;
  - A summary of the main issues raised by the representations made pursuant to Regulation 18 and
  - How many representations made pursuant to Regulation 18 have been taken into account.
- 1.4 The Representation Statement and the Consultation Statement collectively form the ‘statement’ which the council are required to submit under Regulation 22 (1) (c).

## 2. The Representation Period

- 2.1 The Climate Emergency Review of the Strategic Policies and Land Allocations DPD and the Climate Emergency Review of the Development Management DPD, associated main proposed submission documents and other relevant documents were published on 31 January 2022. Representations were invited over a six-week period, closing 5pm on Monday 14 March 2022.

## 3. How Many Representations were Received?

- 3.1 A total of 225 duly made representations were made by 51 representors on the two DPDs. A total of 22 duly made representations were made in respect of both DPDs, 81 duly made representations were on the Climate Emergency Review of the Strategic Policies and Land Allocations DPD and 113 on the Climate Emergency Review of the Development Management DPD. Representations were also made specifically about the Green and Blue Infrastructure Strategy, the Habitat Regulations Assessment, the Strategic Flood Risk Assessment, the Sustainability Appraisal and the Viability Assessment.

## 4. Summary of the Main Issues Raised to the Strategic Policies and Land Allocation DPD

- 4.1 A number of representations consider the Climate Emergency Review of the Strategic Policies and Land Allocation DPD to be sound as a whole. Representations welcome the policies in the DPD which reflect the Council's commitment to climate change and support the way in which they ensure new development will adapt to and mitigate the impacts of climate change. Comments received particularly support the role the natural environment can play. Representations welcome greater recognition of the value of enhancing the green and blue infrastructure network, the multifunctionality and connectivity of such assets, and the importance of natural resources such as soil for carbon storage and sequestration.
- 4.2 Supporting comments relate to the soundness of policies S02, SO3, SO5, CC1, SP4, SP8, SP7, SP9, SP10, SG4, SG9, T1, T2, T4 and SC4 which:
- Support the Council's commitment to addressing climate change through planning policy.
  - Recognise the importance of green and blue infrastructure, biodiversity and nature recovery.
  - Recognise the importance of soil as a natural resource to be protected as carbon storage and sequestration.
  - Include reference to national nature recovery network and the LNRS.
  - Highlight the importance of connectivity and multifunctionality and sign post the Council's GBI Toolkit which will support climate change mitigation/adaptation and nature-based solutions.
  - Reference the canal in context of regeneration and GBI networks.
  - Support production of a district-wide Heritage Strategy.
  - Include greater recognition of value of enhancing GBI network and connecting to wider network.
- 4.3 Representations were received which explicitly state they consider the Climate Emergency Review of the Strategic Policies and Land Allocation DPD and specific policies within it to be unsound. The issues raised relate to the impact on viability and deliverability, ambiguity and lack of clarity, inconsistencies between policy aims, the unnecessary duplication which will arise from the low carbon homes policies, the need for flexibility within policies and consideration of site-specific circumstances, the lack of additional allocations to address development requirements and the reliance of greenfield sites for development.
- 4.4 The key issues which are raised mainly relate to matters of soundness with regard to policies CC1, SP2, SP3, SP4, SP6, SP8, SP9, SP10, SG1, SC4, H2, T2, T4, EN6 and SC4. These issues include:
- The strategic policies around climate change are more of a statement of intent with the main policy requirements covered elsewhere in the plan.
  - The requirement for a greater emphasis upon renewable energy needed at a strategic level as a key driver if the district's ambitions for carbon neutrality.
  - Strategic climate change policy should acknowledge how climate change matters will change on a site-by-site basis and consideration given to viability.
  - Concerns that the introduction of more stringent climate related policies will result in other local policies being compromised, particularly when considering viability.
  - That no weight is given to the substantial viability challenge to the delivery of jobs and economic growth.

- The provision of low-carbon energy efficient homes should be done in line with Government plans to introduce this through national standards and building regulations to avoid duplication and inconsistencies.
  - There is a lack of a sufficiently skilled workforce which is likely to be a potential constraint that could affect the delivery of higher/alternative building standards when compared to current processes.
  - Active travel should be determined on a site by site basis and not threaten viability considerations.
  - LTN1/20 should be achieved wherever possible, recognising it may not be suitable or feasible in all circumstances. It should be set up as guidance, allowing for flexibility on a site-by-site basis.
  - There are viability concerns surrounding the walking and cycling requirements.
  - It is not clear how deficiencies in existing public transport services will be identified or how high-quality services will be defined. Sustainable travel options need to be considered on a site-by-site basis in case of significant costs and viability concerns.
  - Housing development still remains concentrated on greenfield sites instead of previously developed land and CELPR has not done anything to change this approach.
  - The CELPR doesn't allocate enough land to fulfil housing policy requirements.
  - The baseline position is a key factor in context of biodiversity net gain and should be recognised in strategic climate policy.
  - A charging schedule for BNG should be added to ensure is based on robust evidence. It is not clear whether 10% BNG is being required.
  - Clarity is required over the phrase 'spaces' used for green and blue spaces.
  - GBI requirements should not threaten viability.
  - Concerns over use of GBI Toolkit in relation to assessment of the mitigation/adaptation value of GBI.
- 4.5 One representation concludes that the DPD is not legally compliant as it does not have regard to national policy.
- 4.6 The above points represent the key issues raised by representations. The table in the attached excel document - Appendix to the Representations Statement, provides greater detail on the matters of interest for representors. The table provides a breakdown and summary of the key issues raised by the duly made representations, in policy order, consultee name and consultee ID number.

## 5. Summary of the Main Issues Raised to the Development Management DPD

- 5.1 A number of representations explicitly state that they consider the Development Management DPD as a whole to be sound. Representations support policies to enhance water management, multifunctional SuDS and GBI, the importance of GBI within development and the ambition for adaptation, mitigation and adaptation.
- 5.2 Supporting comments relate to the soundness of policies DM29, DM30b, DM33, DM34, DM43, DM57, DM59 and DM61, which include:
- A progressive and innovative approach to flood risk and surface water management.

- The incorporation of GBI as an integral part of development and commitment to a GBI first approach.
- Support for linkages between green and blue infrastructure and policies which ensure these will be at the forefront of the design process.
- Identification of the GBI network.
- Adoption of water efficiency measures.
- Support for an accessible pedestrian environment.
- The Council's ambition to ensure and enable suitable climate change adaption, mitigation and resilience measures.

5.2 Representations explicitly state that they consider the Development Management DPD to be unsound. The overriding issue relates to the impact of the proposed policies will have upon the viability of development and the lack of flexibility within policies to allow for viability constraints. Policies are also considered unsound as they will introduce carbon reduction requirements which will duplicate and then exceed Building Regulations and are considered unnecessary. It is considered that the fabric first approach will result in inconsistencies with national requirements. A number of policies are considered inconsistent with national policies, with other policies within the local plan and unjustified.

5.3 The key issues which are raised mainly relate to matters of soundness with regard of policies DM1-3, DM19, DM27, DM29, DM30a, DM30b, DM30c, DM31, DM33, DM34, DM36, DMCCH1, DMCCH2, DM43, DM45, DM46, DM53, DM57, DM58, DM61 and DM62. These issues include:

- The lack of evidence to support the proposed policy changes.
- The viability assessment assumptions do not accord with the NPPF as they are arbitrary, non-market facing, insufficiently evidenced and have not been through a collaborative process with stakeholders. The inputs are unrealistic and over state viability.
- Viability concerns in relation to most of the proposed policy requirements relating to achieving zero carbon development, transport/travel policy requirements, GBI and water management.
- The lack of flexibility within policies to allow for site circumstances, site and technical constraints and viability.
- The Council cannot demonstrate a 5-year land supply and the additional burdens will exacerbate this issue.
- The Sustainable Design Statement is unnecessary.
- The housing policies have not been reviewed which is likely to result in more application specific viability assessments.
- First homes have not been correctly addressed within the policy and the requirements for 10% affordable homes for sale does not sit within the tenure split within the 15% affordable home requirement.
- Properties cannot be orientated as required for solar gain and the type of dwelling required to meet the design requirements is likely to affect viability and housing choice.
- It is unclear what needs to be provided for food growing opportunities.
- The carbon reductions will be secured through Building Regulations, the policy requirement therefore creates duplication, is not necessary and is contrary to paragraph 16 of the NPPF. The requirements to meet carbon targets for new development exceed proposed Building Regulations. The requirement for the carbon reduction to be achieved through fabric first risks dual consenting regimes being used and that developments may not meet the Building Regulation requirements.

- The carbon reduction requirements lack transitional arrangements which will add financial burden, supply chain and skills issues and adversely affect delivery.
- The highest standards for improvements for sustainability, carbon reduction, transport modal shift and climate resilience should be required from the start to prevent the continuation of unsustainable practices.
- The requirement for retrofitability has not been viability tested.
- Blue and green walls are not supported by viability evidence.
- Upscaling of MMC is determined by external factors and consideration should sit alongside other policies such as housing mix and design.
- Policies relating to flood risk and SuDS should not exceed national policy and legislation. If viability is threatened or there are technical constraints, flexibility should be available. There is an inconsistency between the hierarchy in policies DM33 and DM34 and between the policies and national policy.
- Additional clauses with regard to ground source protection zones and water catchment land should be included in policy.
- The requirement relating to water efficiency is unjustified, includes requirements beyond national policy and building regulations and will have viability implications.
- Requirements for the retrofitting of historic buildings for energy efficiency should be consistent with national policy and regulations. The new heritage policies are unnecessary, weaken heritage protection and are inconsistent with national policy.
- The dwelling thresholds for open/recreational space have changed.
- There is a lack of consistency between the protection of GBI and ANOB is affordable in the proposed policies, national policies and AONB DPD policies.
- It must be clear how GBI protection policies will be applied, and they must not prevent opportunities for renewable energy or sustainable growth.
- Policies relating to micro renewables and energy efficiency will undermine the protection of heritage assets.
- There needs to be flexibility when applying Local Transport Note 1/20 in terms of providing cycle infrastructure.

5.5 One representation concludes that the DPD is not legally compliant as it does not have regard to national policy.

5.6 The above points represent the key issues raised by representations. The table in the attached excel document - Appendix to the Representations Statement, provides greater detail on the matters of interest for representors. The table provides a breakdown and summary of the key issues raised by the duly made representations, in policy order, consultee name and consultee ID number.

A LOCAL PLAN FOR LANCASTER (CLIMATE EMERGENCY REVIEW OF THE STRATEGIC POLICIES AND LAND ALLOCATIONS DPD AND THE CLIMATE EMERGENCY REVIEW OF THE DEVELOPMENT MANAGEMENT DPD)													
APPENDIX TO THE REPRESENTATIONS STATEMENT (Regulation 22)(1)(c)(v-vi)													
SUMMARY OF THE REPRESENTATIONS													
PINS REF	REP NAME	ORGANISATION	DULY MADE	DPD	CHAPTER	POLICY	PARA	PAGE	LEGALLY COMPLIANT	SOUNDNESS	Officer responding	SUMMARY OF RESPONSE (SOUNDNESS)	(Intent) ATTENDING EXAMINATION
PINS_42/01/LC/S	Andrew Leyskens	United Utilities	Online	Both DPDs	Chapter 09 Chapter 10, Chapter 23,	SP8, SC4, DM33 & DM43	N/A	56, 181, 85, 91	LC	S		Welcome and support the CELPR to reflect the Council's commitment to climate change including sustainable drainage systems, green and blue infrastructure and the recognition of the importance of biodiversity and nature recovery. Support the inclusion of policies which link green/blue infrastructure, surface water management, landscape design and biodiversity to help ensure sustainable surface water management is at the forefront of the design process.	No
PINS_07/01/LC/S	Alison Cahn	N/A	Online	Both DPDs	N/A	ALL	N/A	N/A	LC	S		DPD Sound	No
PINS_12/01/LC/S	James Teasdale	Blackpool Council	Online	Both DPDs	N/A	ALL	N/A	N/A	LC	S		DPD Sound	No
PINS_01/01/LC/S	Warren Hilton	National Highways	Online	Both DPDs	N/A	N/A	N/A	N/A	LC	S	N/A	No comments to make	No
PINS_02/01/LC/S	Jackie Copley	CRPE	Online	Both DPDs	N/A	N/A	N/A	N/A	LC	S	DN	Supportive of The CELPR and the amendments made for Reg 19. CPRE note the changes made to SO2, SO3, SC4 and the Key Diagram and are supportive of the changes made to SP4, SP8, SP9, SP10 and the fabric first approach taken by LCC.	No
PINS_03/01/LC/S	Liz Locke	Environment Agency	Online	Both DPDs	N/A	N/A	N/A	N/A	LC	S	N/A	State 'DPDs are both legally compliant and sound'.	No
PINS_18/01/LC/S	Jonathan Sear		Online	Both DPDs	N/A	N/A	N/A	N/A	LC	S		DPD Sound	No
PINS_20/01/LC/S	Frances Bowen		Online	Both DPDs	N/A	N/A	N/A	N/A	LC	S		DPD Sound	No
PINS_22/01/LC/S	Sara Bundy		Online	Both DPDs	N/A	N/A	N/A	N/A	LC	S		DPD Sound	No
PINS_24/01/LC/S	Gisela Renolds		Online	Both DPDs	N/A	N/A	N/A	N/A	LC	S		DPD Sound	No
PINS_27/01/LC/S	Professor Rosemary Betterton		Online	Both DPDs	N/A	N/A	N/A	N/A	LC	S		DPD Sound	No
PINS_28/01/LC/S	Dr Emily Health		Online	Both DPDs	N/A	N/A	N/A	N/A	LC	S		DPD Sound	No
PINS_29/01/LC/S	Helen Taylor		Online	Both DPDs	N/A	N/A	N/A	N/A	LC	S		DPD Sound	No
PINS_32/01/LC/S	Rachel Bindless		Online	Both DPDs	N/A	N/A	N/A	N/A	LC	S		Respondent considers the DPDs are sound but would like stronger emphasis on PDL first approach, that development must compensate communities to replace what has been lost through buildings projects (i.e. provide allotments when houses are built). These should be non-negotiable. List of proposed compensatory measures provided in the rep.	No
PINS_34/01/LC/S	Patricia Jackson		Online	Both DPDs	N/A	N/A	N/A	N/A	LC	S		DPD Sound. The Local Plan should give stronger provision to ensure that 1) brownfield sites are fully and completely regenerated before new green sites are considered for building projects. 2) The Local Plan must provide water tight regulation to ensure enough affordable eco homes are built on new sites. 3) working collaboration with local groups/communities in order for there to be compensation provided by developers to the local communities for the loss of open spaces (e.g. parks, tree planting, outdoor nature areas etc.)	No
PINS_35/01/LC/S	Elizabeth Jackson		Online	Both DPDs	N/A	N/A	N/A	N/A	LC	S		DPD Sound	No
PINS_38/01/LC/S	Hannah Jones	Homes England	Online	Both DPDs	N/A	N/A	N/A	N/A	LC	S		Homes England does not wish to make any representations on specific policies but wishes to confirm its support to the Council to update the Local Plan to address climate change, and it shares the Council's ambition to include suitable mitigation and adaptation measures to address the climate emergency. Lundsfield Quarry- Homes England welcomes the continued allocation of the site for the delivery of up to 250 dwellings. Homes England would like to highlight that flexibility within Policy SG11 (paragraph 2) is particularly important to enable viability issues to be accommodated.	No
PINS_40/01/LC/S	Laura Miller	WSP on behalf of Peel	Online	Both DPDs	N/A	N/A	N/A	N/A	LC	S		Supportive of the amended policies and the approach taken by LCC but states the extent to which developments can incorporate mitigated measures to tackle climate change will ultimately depend on viability and the availability of suitable techniques and technologies.	No
PINS_43/01/LC/S	Marcus Hudson	Lancashire County Council	Online	Both DPDs	N/A	N/A	N/A	N/A	LC	S		Respondent states that the broad intent of reducing carbon emissions is supported, the proposed Fabric First approach relies heavily on repeating building regulation changes in planning policy. A more effective planning approach should include a focus on understanding the links between economic prosperity and the opportunities presented by carbon reduction activities and the potential adaptation and emergence of associated economic sectors. The reference to a focus on renewable energy generation and storage is supported but should be part of an understanding of wider sectoral opportunities. The HIF is central to achieving development in S Lancaster and without this only urban extensions will come forward.	No
PINS_43/02/LC/S	Marcus Hudson	Lancashire County Council	Online	Both DPDs	N/A	N/A	N/A	N/A	LC	S		Respondent states that the new policy requirements will place further pressure on the viability of development sites and may be used as justification to reduce other payments. The respondent is reassured to see that the viability assessment states 'the policies set out in the plan do not put at risk the overall delivery of the Plan'; though the vague reference to 'overall delivery' raises concerns. Respondent states that there must be recognition and priority given in the Local Plan to the requirement for developers' planning obligations to contribute, as a priority, to the costs of opening up and supporting new development with necessary transport, education other community infrastructure. This includes additional road capacity.	No
PINS_47/01/LC/S	Melanie Lindsley	The Coal Authority	Online	Both DPDs	N/A	N/A	N/A	N/A	LC	S		No specific comments to make.	No
PINS_48/01/LC/US	Jack Spees	Lancashire Local Nature Partnership	Online	Both DPDs	N/A	N/A	N/A	N/A	LC	US		Respondent would like SA and HRA to be undertaken in house. The spatial portrait section is considered generic and inconsistent with the tenor of an ecological emergency. There should be no woodland or biodiversity loss relating to the BGV.	tbc
PINS_11/04/LC/US	Councillor Keith Reed	Silverdale Parish Council	Online	Development Management DPD	All Policies	N/A	N/A		LC	US		In principle most changes are welcomed. Representation refers to the policies being repetitive and therefore difficult to take into account in decision making and for consultees responding to planning applications, they will not as effective as they could be. There is a lack of consistency with national policy.	tbc
PINS_13/01/LC/US	Hannah Gradwell	Cushman & Wakefield	Online	Development Management DPD	Chapter 04	DM1-DM3	All	11,13,15	LC	US		As the housing policies are not being amended it is likely that there will be an increase in FVAs at application stage as a result of more stringent national mandatory requirements relating to energy efficiency.	tbc
PINS_39/09/LC/US	Peter Dutton	Gladman	Online	Development Management DPD	Chapter 04	DM3	N/A	15	LC	US		Notes that no further changes have been added. Respondent states that they provided further comments on this topic in their reps to the Housing Needs SPD in December 2021.	tbc
PINS_51/04/LC/US	Joanne Harding	Home Builders Federation (HBF)	Online	Development Management DPD	Chapter 04	DM3	N/A	15	LC	US		Respondent draws attention to the NPPF requirement for 10% of homes to be for affordable home ownership. The Council needs to consider how this will work with the 15% affordable home requirement in part of the district and if it is not intended to meet the 10% affordable home ownership requirement, this will need to be evidenced. First Homes should be covered by the affordable home for sale tenure within the tenure split.	Yes
PINS_30/04/NLC/US	Hannah Richins	Story Homes, Care of Agent	Online	Development Management DPD	Chapter 04	DM3	N/A	15	NLC	US		DM3 First homes requirement needs to be referenced in the policy.	Yes



PINS_45/06/LC/US	Mark Aylward	Aylward Planning on behalf of Derwent Development Management Ltd,	Online	Development Management DPD	Chapter 06	DM19	N/A	49	LC	US		Respondent states DM19 to be poorly worded and consider Repts on this made at Reg 18 have been ignored. Respondent wishes to see thresholds changed.	tbc
PINS_49/01/LC/US	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	Development Management DPD	Chapter 07	DM27	N/A	60	LC	US		Respondent acknowledges changes to DM27. CELPR policy requirements should not undermine the delivery of the Masterplan for the North Lancaster strategic site.	Yes
PINS_13/06/LC/US	Hannah Gradwell	Cushman & Wakefield	Online	Development Management DPD	Chapter 09	DM30b	All paragraphs & associated CELPR VA	78	LC	US		The measures in DM30b to maximise water efficiency will add cost to development.	tbc
PINS_13/02/LC/US	Hannah Gradwell	Cushman & Wakefield	Online	Development Management DPD	Chapter 09	DM29	All paragraphs & associated CELPR VA	65	LC	US		DM29 - it will not be possible to orientate every plot for solar gain. Costs associated with shading have not been factored in to the VA. Policy DM29 may require a greater amount of mews/apartment development to achieve the targets, this will affect viability and housing choice.	tbc
PINS_30/05/NLC/US	Hannah Richins	Story Homes, Care of Agent	Online	Development Management DPD	Chapter 09	DM29	N/A	65	NLC	US		DM29- reference to solar gain has density impacts and therefore this element of the policy should be deleted or add 'where appropriate' to the policy.	Yes
PINS_13/04/LC/US	Hannah Gradwell	Cushman & Wakefield	Online	Development Management DPD	Chapter 09	DM29, DM30a	All paragraphs & associated CELPR VA	65, 71	LC	US		Policy DM30a should be amended to ensure that it does not go beyond government Building Regulation aspirations should these change between now and 2025. Object to the net zero carbon emissions requirement for 2028 as this goes beyond proposed national requirements and it has not been demonstrated that this will be viable. There are also practical issues due to industry capacity, skills and supply chain shortages. There is a lack of clarity associated with the terminology and what is meant by net zero. More detail is required with regard to the cost assumptions for net zero carbon which cannot be delivered at the costs used in the VA. The requirements to facilitate retrofitting for climate adaption, monitoring for the performance gap and requirement to offer purchasers other technologies have not been included in the VA. The latter is ambiguous as drafted and adds uncertainty. The application of the carbon reduction requirements at the commencement of each house contradicts the governments approach to the Building Regulations, it will cause practical difficulties and it is not clear how this will apply to terraces or flats. DM29 - it will not be possible to orientate every plot for solar gain. Costs associated with shading have not been factored in to the VA. Policies DM29 and DM30a may require a greater amount of mews/apartment development to achieve the targets, this will affect viability and housing choice.	tbc
PINS_13/07/LC/US	Hannah Gradwell	Cushman & Wakefield	Online	Development Management DPD	Chapter 09	DM30c	All paragraphs & associated CELPR VA	80	LC	US		DM30c includes some flexibility but this is lacking in other policies.	tbc
PINS_31/04/NLC/S	Stephen Harris	Wainhomes c/o Emery Planning	Online	Development Management DPD	Chapter 09	DM30c	N/A	80	LC	US		DM30c- the Sustainable Design Strategy should demonstrate how the proposed development would minimise resource and energy consumption compared to the minimum required under current Building Regulations legislation. Some flexibility should be built into the policy. The policy should be altered so that the words should seek to are added into the first paragraph "Proposals for major developments should seek to demonstrate....."	Yes
PINS_30/07/NLC/US	Hannah Richins	Story Homes, Care of Agent	Online	Development Management DPD	Chapter 09	DM30c	N/A	80	NLC	US		DM30c- no viability evidence included in relation to the need for blue and green walls.	Yes
PINS_30/08/NLC/US	Hannah Richins	Story Homes, Care of Agent	Online	Development Management DPD	Chapter 09	DM33	N/A	85	NLC	US		DM33- Remove reference to play areas from the list of typologies to be located in areas at low risk of flooding.	Yes
PINS_13/08/LC/US	Hannah Gradwell	Cushman & Wakefield	Online	Development Management DPD	Chapter 09	DM34	All paragraphs	91	LC	US		The deletion in DM34 would remove necessary flexibility where deviation is required for practical or viability reasons.	tbc
PINS_04/01/LC/US	Matt Verlander	Avison Young on behalf of National Grid	Online	Development Management DPD	Chapter 09	DM29	9.2	66	LC	US	DN	States that policies should not be considered effective as cannot be delivered as proposed. Policy DM29 requests additional wording respecting existing site constraints (infrastructure).	tbc
PINS_09/02/LC/US	Leith Planning Ltd on behalf of EPC-UK	EPC-UK	Online	Development Management DPD	Chapter 09	DM29	N/A	65	LC	US		Respondent states the policy does not go far enough in relation to community safety near to major hazard sites in line with national policy and guidance. Respondent has specific concerns about a site at Dunald Mill. In relation to the sub section entitled 'Other Environmental Considerations' respondent wishes to see commentary added in relation to protecting hazard sites and locating development away from sensitive locations.	tbc
PINS_39/10/LC/US	Peter Dutton	Gladman	Online	Development Management DPD	Chapter 09	DM29	N/A	65	LC	US		No comments to make on addition of maximising benefits from solar gain through site layout and building orientation, but would welcome assurance that this will be on a site by site basis.	tbc
PINS_40/11/LC/US	Laura Miller	WSP on behalf of Peel	Online	Development Management DPD	Chapter 09	DM29	N/A	65	LC	US		Agrees overall with additional principles of DM29, however a balanced approach should be taken to maximising solar gain and energy generation etc.. within sites. LCC need to consider viability, design and merging technologies alongside site delivery. Supports that roads are designed to prioritise safety of the most vulnerable and maximising opportunities for active travel. Respondent also recognises importance of GBI and necessity to incorporate opportunities for food growing and composting but that this should be on a site by site basis. Rewording is suggested by respondent to highlight viability and deliverability.	tbc
PINS_41/03/LC/S	Gavin Rutter	Canal & River Trust	Online	Development Management DPD	Chapter 09	DM29	XIV	65	LC	S		Agree that GBI would be incorporated as an integral part of new development. Could include working "at an early stage" to ensure GBI isn't just an add-on. Policy could also highlight the importance of connectivity between GBI assets and links to the wider environment . The explanatory text, "Site layout and design" outlines how design can be used to address climate change, this section could be included in the policy as a general principle.	No
PINS_49/02/LC/US	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	Development Management DPD	Chapter 09	DM29	N/A	65	LC	US		Acknowledges amendments to DM29. Highlights potential issue in relation to orientation to prevent overheating and maximise solar gain. Respondent states where the CELPR seeks 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. Respondent acknowledges Policy DM58, which includes a proposed mechanism for relaxing requirements where viability is threatened, but states there should be reference to the relaxing of requirements on viability grounds either in Policy DM29 or its sub-text.	Yes

PINS_51/05/LC/US	Joanne Harding	Home Builders Federation (HBF)	Online	Development Management DPD	Chapter 09	DM29	N/A	65	LC	US	Respondent 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, and reflected in the policy wording, with other considerations such as site density, site layout, topography, heat resilience, site viability and deliverability. Building at a higher density can allow for more effective use of land to meet housing requirements, however, this can have the effect on reducing the potential for solar gain. Respondent also 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. Respondent does not consider amendment to the justification text in paragraph 9.5 is necessary, the inflexibility may not be appropriate with the intention to ensure effective use of land and promote active travel. Respondent 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. Provision may not be appropriate in all types of development.	Yes
PINS_13/03/LC/US	Hannah Gradwell	Cushman & Wakefield	Online	Development Management DPD	Chapter 09	DM30a	All paragraphs & associated CELPR VA	71	LC	US	Policy DM30a should be amended to ensure that it does not go beyond government Building Regulation aspirations should these change between now and 2025. Object to the net zero carbon emissions requirement for 2028 as this goes beyond proposed national requirements and it has not been demonstrated that this will be viable. There are also practical issues due to industry capacity, skills and supply chain shortages. There is a lack of clarity associated with the terminology and what is meant by net zero. More detail is required with regard to the cost assumptions for net zero carbon which cannot be delivered at the costs used in the VA. The requirements to facilitate retrofitting for climate adaption, monitoring for the performance gap and requirement to offer purchasers other technologies have not been included in the VA. The latter is ambiguous as drafted and adds uncertainty. The application of the carbon reduction requirements at the commencement of each house contradicts the governments approach to the Building Regulations, it will cause practical difficulties and it is not clear how this will apply to terraces or flats. Policy DM30a may require a greater amount of mews/apartment development to achieve the targets, this will affect viability and housing choice.	tbc
PINS_30/06/NLC/US	Hannah Richins	Story Homes, Care of Agent	Online	Development Management DPD	Chapter 09	DM30a	N/A	71	NLC	US	DM30a should be deleted as no clear evidence of why this is needed in addition to building reg requirements. Information should be included in a D&A statement rather than a Sustainable Design Statement.	Yes
PINS_31/03/NLC/S	Stephen Harris	Wainhomes c/o Emery Planning	Online	Development Management DPD	Chapter 09	DM30a	N/A	71	LC	US	DM30a- Respondent states the policy is inconsistent with national policy and guidance which make clear that the only additional technical requirements which can be sought in addition to Building Regulations are the optional technical standards detailed in the NPPG. Any policy over and above national guidance would need to be justified with viability considerations. Following the national approach will provide certainty and consistency to developers. Differing approach between LPA will result in additional costs and delays. The adopted Local Plan is supported by a Viability Assessment, nonetheless development proposals can be accompanied by developer viability assessments. Compliance with Policy 30a will introduce additional development costs. Although the CELPR is supported by an updated Local Plan Viability Assessment developer challenges on viability can still be expected. On the basis of this expectation, compliance with Policy 30a is not considered viable in principal and proposals should be required to comply only with extant Building Regulations at determination.	Yes
PINS_39/11/LC/US	Peter Dutton	Gladman	Online	Development Management DPD	Chapter 09	DM30a	N/A	71	LC	US	Supportive of the drive to implement higher performance standards but question if it is necessary in light of the governments roadmap/ Future Homes Standard. Unclear if the first target in LCCs approach remains relevant in light of the changes to Building Regs announced in Dec 2021. Respondent is concerned that building standards that go beyond the national approach will place unnecessary burdens on developers and viability of proposals. Concerns that the VA work is not based on accurate or up to date information on the build costs associated with implementing higher building performance targets. Respondent welcomes LCC's confirmation of the ability to integrate further opportunities for low carbon energy and renewable technologies or sustainability measures into development proposals to facilitate future/optional installation by building purchasers or occupiers. The council should ensure this requirements is appropriately assess as part of its VA work.	tbc
PINS_40/12/LC/US	Laura Miller	WSP on behalf of Peel	Online	Development Management DPD	Chapter 09	DM30a	N/A	71	LC	US	Respondent is supportive of proposed wording of DM30a but consider LCC need to take viability and deliverability into account when considering the policy. Whilst the Council should encourage delivery of sustainable design and construction methods, it should not be a requirement of policy without due consideration as to other aspects of the planning balance.	tbc
PINS_45/07/LC/US	Mark Aylward	Aylward Planning on behalf of Derwent Development Management Ltd,	Online	Development Management DPD	Chapter 09	DM30a	N/A	71	LC	US	Respondent states that this should serve to ensure that opportunities for sustainable economic development are secured, but that this should give proper consideration of the need to maintain viability so that job opportunities for local people can be met. Respondent considers that the amendment made to the policy fails to recognise that the Climate Change emergency will not be met if residents are unable to secure work in Lancaster and have to complete longer commuting journeys to do so. Strongly object to the policy. Also suggests amendments are made to the BREAAAM element of this policy.	tbc
PINS_49/03/LC/US	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	Development Management DPD	Chapter 09	DM30a	N/A	71	LC	US	Respondent states it would not be acceptable for the first stage of the stepped approach set out in DM30a to come into force in December 2022 (anticipated adoption of CELPR) before the updated buildings regs do, as it is unclear how the new requirements would be achieved in practice and could threaten viability/ delivery of housing and also the building regs have been designed to allow developers to prepare for achieving new requirements. Respondent is also concerned that the costs associated with achieving net zero have not been properly accounted for in the VA. Don't consider that the proposed measures can be secured by condition to be consistent with national policy. The VA also hasn't accounted for the requirement for new development to include opportunities for low carbon technologies or sustainability measures. Respondent draws attention to the Cushman & Wakefield response (Rep no.13). Respondent states that it is critical that Policy DM30a is amended to confirm that the additional policy requirements and design principles are subject to viability, and that there is the ability for the requirements to be relaxed where robustly justified on viability (or other) grounds on a site-by-site basis. Respondent acknowledges Policy DM58, which includes a proposed mechanism for relaxing requirements where viability is threatened. However, there should be reference to the relaxing of requirements on viability grounds either in Policy DM30a or its sub-text.	Yes
PINS_51/06/LC/US	Joanne Harding	Home Builders Federation (HBF)	Online	Development Management DPD	Chapter 09	DM30a	N/A	71	LC	US	Respondent states that considers that 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 respondent also considers that requirements for a Sustainable Design Statement are unnecessary and questions the need for whole life cycle emissions. Respondent is also concerned about how the low carbon energy and renewable technologies or other sustainability measures to be integrated into the build element of the policy has been considered in the Council's Viability Assessment.	Yes
PINS_44/09/LC/S	Helen Clarkson	CBRE Limited on behalf of Lancaster University.	Online	Development Management DPD	Chapter 09	DM30a, DM30b, DM30c	N/A		LC	S	Respondent continues to support these policies.	No
PINS_11/01/LC/US	Councillor Keith Reed	Silverdale Parish Council	Online	Development Management DPD	Chapter 09	DM30a, DM30b, DM30c	N/A	71, 78,80	LC	US	In Policy DM30a, reference to submission of a Sustainable Design Statement and Energy Statement should be included in the supporting text, as should the reference to being evidenced in the Sustainable Design Statement in Policy DM30b.	tbc

PINS_31/05/NLC/S	Stephen Harris	Wainhomes c/o Emery Planning	Online	Development Management DPD	Chapter 09	DM30b	N/A	78	LC	US	DM30b- Policies on energy/water efficiency need to be consistent with the national agenda and any policy over and above, as in the case here where the optional 110 litres per day is set out, would need to be justified with viability considerations. The policy text requiring the optional water efficiency standard is not justified and is not consistent with national policy and building regulations (G2). The policy should be deleted.	Yes
PINS_39/12/LC/US	Peter Dutton	Gladman	Online	Development Management DPD	Chapter 09	DM30b	N/A	78	LC	US	No specific comments to make on additional amendments on water efficiency and consumption measures but if these are enforced the Council should ensure that it has properly understood any implications for building design and construction costs. Note the Council's aspiration to implement the optional water efficiency standards. Respondent highlights that the PPG on Housing Options Technical Standards advises that this can be applied if criteria are met and LCC should ensure these have been met.	tbc
PINS_40/13/LC/US	Laura Miller	WSP on behalf of Peel	Online	Development Management DPD	Chapter 09	DM30b	N/A	78	LC	US	Support aim of this policy however viability should be considered especially in terms of the need to meet Building Regs and meeting housing requirements. Also consider that the inclusion of the requirement for greywater recycling and rain garden is overly prescriptive and would likely have a significant impact on development viability	tbc
PINS_42/03/LC/S	Andrew Leysens	United Utilities	Online	Development Management DPD	Chapter 09	DM30b	N/A	78	LC	S	Welcome the inclusion of DM30b, tighter water efficiency has multiple benefits including a reduction in water and energy use as well as helping to reduce bills.	No
PINS_49/04/LC/US	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	Development Management DPD	Chapter 09	DM30b	N/A	78	LC	US	Respondent has no major objection to the policy as is consistent with Building Regs but notes this is an 'optional' requirement. Respondent does not agree with the wording ("maximise the inclusion of water efficiency") as this will add to development costs and impact viability. States the VA has tested climate related building standards under DM30a but additional requirements such as this have not been accounted for and could affect viability.	Yes
PINS_51/07/LC/US	Joanne Harding	Home Builders Federation (HBF)	Online	Development Management DPD	Chapter 09	DM30b	N/A	78	LC	US	The respondent states that 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. Therefore, the respondent 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.	Yes
PINS_39/13/LC/US	Peter Dutton	Gladman	Online	Development Management DPD	Chapter 09	DM30c	N/A	80	LC	US	Respondent states it is unclear if the requirement to consider the full lifecycle of a building, including associated emissions and environmental pollutants will necessitate the use of alternative construction methods and materials. It is assumed this is an aspiration to be explored on a case by case basis rather than a rigid policy requirement otherwise it may have viability implications.	tbc
PINS_40/14/LC/US	Laura Miller	WSP on behalf of Peel	Online	Development Management DPD	Chapter 09	DM30c	N/A	80	LC	US	Support aim of this policy however viability should be considered and policy should be amended to reflect this. Submission of a Sustainable Design Statement to support planning applications is endorsed.	tbc
PINS_49/05/LC/US	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	Development Management DPD	Chapter 09	DM30C	N/A	80	LC	US	Respondent supports the wording of Policy DM30c in that points 1, 4 and 5 are subject to the phrases "wherever possible", "where possible" and "where appropriate", respectively. However, Taylor Wimpey 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. Respondent supports the use of local suppliers, renewable and/or low carbon materials, and modern methods of construction in principle, but would not support an indiscriminate policy requirement to implement any specific measures, such as the inclusion of low carbon/carbon sequestering materials, as outlined in the sub-text to Policy DM30c (New paragraph 33). Respondent acknowledges Policy DM58, which includes a proposed mechanism for relaxing requirements where viability is threatened. However, to ensure that Policy DM30c is effective, there should be reference to the relaxing of requirements on viability grounds either in Policy DM30c or its sub-text.	Yes
PINS_51/08/LC/US	Joanne Harding	Home Builders Federation (HBF)	Online	Development Management DPD	Chapter 09	DM30c	N/A	80	LC	US	Respondent is generally supportive of MMC but, 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. Respondent states that LCC should consider how the promotion of MMC would sit alongside the Council's other policies particularly those in relation to design or housing mix. Respondent considers that requirements for a Sustainable Design Statement are unnecessary.	Yes
PINS_49/06/LC/US	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	Development Management DPD	Chapter 09	DM31	N/A	81	LC	US	Respondent acknowledges amendments to supporting text of DM31 and LCCs intention to produce an EV SPD. Respondent notes the amendments proposed to new paragraph 35 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. The policy should include a mechanism to relax the requirement on viability grounds.	Yes
PINS_39/14/LC/US	Peter Dutton	Gladman	Online	Development Management DPD	Chapter 09	DM33	N/A	85	LC	US	Respondent has no further comments to make other than the policy should be consistent with national policy on flood risk and separate LLFA requirements and EA.	tbc
PINS_40/15/LC/US	Laura Miller	WSP on behalf of Peel	Online	Development Management DPD	Chapter 09	DM33	N/A	85	LC	US	Agree with overall approach in the Policy but suggest amendment in relation to soundness.	tbc
PINS_49/07/LC/US	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	Development Management DPD	Chapter 09	DM33	N/A	85	LC	US	Respondent that the policy text has been amended to refer to the Council's "Flood Risk – Sequential Test and Exception Test Supplementary Planning Document". However, item X of Policy DM 33 still refers to the Council's "Flood Risk and Sustainable Drainage Water Supplementary Planning Document". Respondent states that requirements introduced by the CELPR 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.	Yes
PINS_51/09/LC/US	Joanne Harding	Home Builders Federation (HBF)	Online	Development Management DPD	Chapter 09	DM33	N/A	85	LC	US	Respondent considers that in relation to play/recreation areas this is contrary to guidance set out in the PPG which is considered to be water compatible. The respondent also does not consider that it is appropriate for the Plan to require new developments to be in accordance with the Council's Flood Risk SPD. This SPD is not being tested as part of the preparation of the Plan, and therefore its contents should not be required to be conformed with. In terms of the proposals being required to reduce the existing causes and impacts of flooding by reducing surface water run-off and/or increasing the capacity of flood storage areas, this could be at considerable cost for any developments in these areas. This could potentially have a significant impact on the delivery of homes.	Yes
PINS_43/03/LC/S	Marcus Hudson	Lancashire County Council	Online	Development Management DPD	Chapter 09	DM33, DM34	N/A	84, 85	LC	S	Respondent is fully supportive of this progressive and wide-ranging local plan, with particular reference to policies DM33 (Development and Flood Risk) and DM34 (Surface Water Run-off and Sustainable Drainage). These innovative policies, written with consultation from partners including ourselves, will result in high quality, multifunctional sustainable drainage systems and blue-green infrastructure across Lancaster, act to protect and restore watercourses and actively manage and reduce flood risks in the district. Additionally, this plan will contribute towards meeting national targets for water quality, biodiversity and carbon sequestration. The plan meets all test of soundness and aligns with Lancashire and NW guidance.	No
PINS_30/09/NLC/US	Hannah Richins	Story Homes, Care of Agent	Online	Development Management DPD	Chapter 09	DM34	N/A	92	NLC	US	DM34- wording of this paragraph should be amended as it is not currently consistent with the drainage hierarchy set out in Policy DM33.	Yes
PINS_39/15/LC/US	Peter Dutton	Gladman	Online	Development Management DPD	Chapter 09	DM34	N/A	91	LC	US	No specific comments to make but LCC should ensure that the proposed SuDS standards and run-off rates are consistent with national guidance and LLFA requirements.	tbc

PINS_40/16/LC/US	Laura Miller	WSP on behalf of Peel	Online	Development Management DPD	Chapter 09	DM34	N/A	91	LC	US		Respondent acknowledges the benefits of SuDS, especially in the context of climate change mitigation and incorporates SuDS as part of 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.	tbc
PINS_49/08/LC/US	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	Development Management DPD	Chapter 09	DM34	N/A	91	LC	US		Respondent objects to the deletion of following statement from Policy DM34, "Only where evidence is supplied to justify why this level of attenuation is not achievable on a site, will the lower rate be acceptable." The deletion of this sentence removes the necessary scope for development to deviate from the policy requirements for practical and/or viability reasons, thus removing flexibility that is critical to ensuring the delivery. A mechanism to allow relaxation where viability is threatened should be included in the policy or sub-text.	Yes
PINS_51/10/LC/US	Joanne Harding	Home Builders Federation (HBF)	Online	Development Management DPD	Chapter 09	DM34	N/A	91	LC	US		Respondent 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 when considering competing planning policy requirements. There may be cases where above ground solutions and for SuDS to incorporate landscape, amenity enhancement and environmental and biodiversity benefits may not be feasible.	Yes
PINS_40/17/LC/US	Laura Miller	WSP on behalf of Peel	Online	Development Management DPD	Chapter 09	DM36	N/A	99	LC	US		In line with the comments for Policy DM34, the respondent acknowledges the benefits of SuDS, especially in the context of climate change mitigation and would intend to incorporate SuDS as part of 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.	tbc
PINS_42/04/LC/US	Andrew Leysens	United Utilities	Online	Development Management DPD	Chapter 09	DM36	N/A	99	LC	US		Welcome the changes and request additional clauses to ensure the protection of Groundwater Source Protection Zones and Water Catchment land to prevent pollution to drinking water supplies.	tbc
PINS_13/05/LC/US	Hannah Gradwell	Cushman & Wakefield	Online	Development Management DPD	Chapter 09	N/A	ALL	N/A	LC	US		Respondent references this Chapter on Reg 19 CELPR consultation response form but no further detail provided on accompanying information.	tbc
PINS_41/05/LC/S	Gavin Rutter	Canal & River Trust	Online	Development Management DPD	Chapter 09	N/A	9.63	99	LC	S		Welcomes inclusion as a key partners. Requests name amended to Canal & River Trust (rather than 'and')	No
PINS_05/01/LC/US	Emily Hrycan	Historic England	Online	Development Management DPD	Chapter 10	DMCCH1	N/A	115	LC	US		Considers that DMCCH1 put heritage at risk by promoting retrofitting in DMCCH1 without making it clear that there are instances where this will not apply and that there are exemptions in Part L. Also considers there to be variation in terminology that should be consistent and the title of the policy is confusing in terms of what the policy is for. Questions how the term 'responsible' is to be applied. Considers the bulleted list contradicts the requirements of the NPPF and Building Regs and is therefore unsound.	tbc
PINS_05/02/LC/US	Emily Hrycan	Historic England	Online	Development Management DPD	Chapter 10	DMCCH1	46	115	LC	US		The background text should mention more than just heating and ventilation to ensure heritage assets are appropriately referenced.	tbc
PINS_05/03/LC/US	Emily Hrycan	Historic England	Online	Development Management DPD	Chapter 10	DMCCH1	47	115	LC	US		Policy should mention that there are exemptions and that the starting point should be the significance of the asset and not balancing the risks and benefits of the responsible retrofit approach. The supporting text should clearly outline what responsible retrofit is.	tbc
PINS_05/04/LC/US	Emily Hrycan	Historic England	Online	Development Management DPD	Chapter 10	DMCCH1	48	116	LC	US		Retrofit requirements do not always apply to a heritage asset - decisions should include the significance of the building not just the requirements of the building.	tbc
PINS_05/05/LC/US	Emily Hrycan	Historic England	Online	Development Management DPD	Chapter 10	DMCCH1	49	116	LC	US		The para does not make it clear that there are exemptions in Part L and therefore the requirements in DMCCH1 on responsible retrofit will not apply. The assertion that retrofitting can be done without harm should be amended as this may not apply in every case.	tbc
PINS_05/06/LC/US	Emily Hrycan	Historic England	Online	Development Management DPD	Chapter 10	DMCCH1	50	116	LC	US		Paragraph doesn't make clear that there are instances where Part L will not apply and therefore puts heritage assets at risk.	tbc
PINS_05/07/LC/US	Emily Hrycan	Historic England	Online	Development Management DPD	Chapter 10	DMCCH2	N/A	116	LC	US		Does not consider that this new policy is needed and should be deleted as the Council has existing adopted policies. Considers that the policy weakens the safeguarding of heritage assets. Wording also says "impact" and it is the "significance" that should be considered. The policy is confusing and does not clearly set out what is required. Archaeology is dealt with by a separate policy which provides more clarity for applicants- the requirement does not go far enough and contradicts other areas of the plan.	tbc
PINS_05/08/LC/US	Emily Hrycan	Historic England	Online	Development Management DPD	Chapter 10	DMCCH2	52	117	LC	US		Character and appearance and setting should be considered not just heritage assets in conservation areas so this is incorrectly drafted. Also it is not just heritage assets in the surrounding areas that can be affected but those further away too	tbc
PINS_11/02/LC/US	Councillor Keith Reed	Silverdale Parish Council	Online	Development Management DPD	Chapter 11	DM43	N/A	117	LC	US		DM43 does not include reference to the AONB or linked open spaces and topic paper 2 mistakenly assumes that the only reason for designation as GBI is protection from development, whereas policies refer to improving and enhancing areas. Policy DM43 should be amended to make it clear that Silverdale and/or the AONB are covered by it.	tbc
PINS_16/04/LC/S	Amy Kennedy	Natural England	Online	Development Management DPD	Chapter 11	DM43	N/A	117	LC	S		As per our comments on Policy SC4, support the proposed changes to Policy DM43, and welcome the introduction of new paragraphs 56 and 57, particularly the commitment to taking a 'GBI first' approach to the design of development proposals.	No
PINS_39/16/LC/US	Peter Dutton	Gladman	Online	Development Management DPD	Chapter 11	DM43	N/A	117	LC	US		No specific comments to make on DM43 but highlight their current development proposals at Bailrigg Lane in South Lancaster and how these have been designed to ensure they protect the Burrow Beck corridor and take opportunities to enhance GBI as part of the proposal.	
PINS_40/18/LC/US	Laura Miller	WSP on behalf of Peel	Online	Development Management DPD	Chapter 11	DM43	N/A	117	LC	US		Respondent requests comments on GBI Strategy consultation in Sept 2021 be noted. Respondent has concerns relating to the term 'Spaces' used in DM43. The green and blue 'Spaces' are not clearly shown or defined within the plan and a clear definition of what the 'spaces' comprises is therefore required. The respondent does not support the use the phrase 'extend the network of green and blue spaces...' as this wholly depends on the definition and identification of the existing network particularly in terms of spaces and the interactive GBI map being an up to date, live map.	tbc
PINS_41/04/LC/S	Gavin Rutter	Canal & River Trust	Online	Development Management DPD	Chapter 11	DM43	N/A	117	LC	S		Policy is useful but should be recognised the GBI assets may extend beyond these 6 key themes. Could add the word 'including' to this para.	No
PINS_44/10/LC/S	Helen Clarkson	CBRE Limited on behalf of Lancaster University.	Online	Development Management DPD	Chapter 11	DM43	N/A	117	LC	S		Respondent supports a network of green and blue infrastructure in the district, however, as set out in the comment on Policies SC4 (PINS_44/08/LC/S) 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 that delivers on the vision and objectives of the CELPR.	No

PINS_49/09/LC/US	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	Development Management DPD	Chapter 11	DM43	N/A	117	LC	US		Notes amendment and agree with GBI being incorporated on housing sites in general but would not support any Green and Blue infrastructure requirement that would threaten the viability and/or deliverability of the North Lancaster Strategic Site or housing sites in general.	Yes
PINS_30/10/NLC/US	Hannah Richins	Story Homes, Care of Agent	Online	Development Management DPD	Chapter 11	DM43	N/A	117	NLC	US		DM43 - not all development will have the potential to enhance or extend GBI. Amend policy to include 'where appropriate'.	Yes
PINS_39/17/LC/US	Peter Dutton	Gladman	Online	Development Management DPD	Chapter 11	DM45	N/A	125	LC	US		No objections to the aspirations of these amendments but query if it would be more appropriate to include similar wording to that in Para 131 of the NPPF. The NPPF at para 180 (c) also does not reference important hedgerows. New Para 62 has been added but respondent considers there are alternative ways of providing and presenting the management and maintenance information that it requires. i.e.. through Landscape and Ecological Management Plan, a condition, s106 obligation or a surface water lifetime management and maintenance plan.	tbc
PINS_40/19/LC/US	Laura Miller	WSP on behalf of Peel	Online	Development Management DPD	Chapter 11	DM45	N/A	125	LC	US		Supports in principle opportunities which increase resilience and woodland but precise nature of protecting existing and planting new trees, hedgerows and woodlands on a site should be decided once the relevant site-specific survey, design and technical work has been undertaken. Considers that policy should reflect this and suggests new wording.	tbc
PINS_49/10/LC/US	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	Development Management DPD	Chapter 11	DM45	N/A	125	LC	US		Respondent supports the planting of new trees, hedgerows and woodland in principle, they 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. Respondent states that requirements introduced by the CELPR 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.	Yes
PINS_50/01/LC/US	Sue Hunter	Arnsdale & Silverdale Area of Outstanding Natural Beauty	Online	Development Management DPD	Chapter 11	DM46	N/A	129	LC	US		Amend 2012 NPPF reference to 2021 NPPF reference.	tbc
PINS_13/09/LC/U9	Hannah Gradwell	Cushman & Wakefield	Online	Development Management DPD	Chapter 11	N/A	All paragraphs of these policies	N/A	LC	US		Respondent references this Chapter on Reg 19 CELPR consultation response form but no further detail provided on accompanying information.	tbc
PINS_04/02/LC/US	Matt Verlander	Avison Young on behalf of National Grid	Online	Development Management DPD	Chapter 13	DM53	13.2	144	LC	US	DN	States that policies should not be considered effective as cannot be delivered as proposed. Proposes that wording is added to DM53 in relation to the need for a strategy for responding to the National Grid transmission pipelines present within a site proposed for renewable/low carbon energy generation.	tbc
PINS_11/03/LC/US	Councillor Keith Reed	Silverdale Parish Council	Online	Development Management DPD	Chapter 13	DM53	N/A	144	LC	US		Consistency with national policy: there is a concern with regard to Policy DM53 in which it is stated that the Council will support proposals for renewable and low carbon schemes where various impacts are acceptable. These include 'impact on the setting of nationally designated landscapes' but do not mention impacts on the landscapes themselves. The existing policy also states that in areas designated for their national importance (such as the AONB), large scale renewable energy infrastructure will only be permitted subject to various criteria. However this does not reflect the presumption against major development in NPPF paragraph 177, nor Policy AS13 of the AONB DPD. Policy DM53 should make it clear the criteria for renewable energy projects include nationally designated landscapes and large scale renewable energy projects will not be permitted in the AONB in accordance with paragraph 117 of the NPPF and policy AS13 of the AONB DPD.	tbc
PINS_44/11/LC/US	Helen Clarkson	CBRE Limited on behalf of Lancaster University.	Online	Development Management DPD	Chapter 13	DM53	N/A	114	LC	US		Respondent supports amendments to DM53. However, it is noted that Figure 13.1 is not accurately reflected in the updated Proposals Map (District level) which appears to exclude the University Bailrigg site, land to the east of the M6 (referred to as 'Forrest Hills') and the existing University wind turbine located off Hazelrigg Lane.	tbc
PINS_51/11/LC/US	Joanne Harding	Home Builders Federation (HBF)	Online	Development Management DPD	Chapter 13	DM53	N/A	144	LC	US		Respondent does not consider it is necessary to make more connections to the heat network and consider that that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies. Consumers do not have a regulatory framework or protection.	Yes
PINS_13/10/LC/US	Hannah Gradwell	Cushman & Wakefield	Online	Development Management DPD	Chapter 13	N/A	All paragraphs of these policies	N/A	LC	US		Respondent references this Chapter on Reg 19 CELPR consultation response form but no further detail provided on accompanying information.	tbc
PINS_40/20/LC/S	Laura Miller	WSP on behalf of Peel	Online	Development Management DPD	Chapter 14	DM57	N/A	160	LC	S		Respondent endorses LCCs desire to promote resilience to climate change through development. Consider that the policy is Sound and complies with para 35 of NPPF.	No
PINS_13/11/LC/US	Hannah Gradwell	Cushman & Wakefield	Online	Development Management DPD	Chapter 15	DM58	All paragraphs	N/A	LC	US		The flexibility within this policy for viability reasons should be included in all other policies.	tbc
PINS_49/11/LC/US	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	Development Management DPD	Chapter 15	DM58	N/A	162	LC	US		Supports LCC's approach to not introduce CIL but consider text of Policy DM58 should be amended. Request that Roger Hannah's reps to Reg 18 consultation are read in conjunction with these reps. The Cushman and Wakefield representation at PINS_13 is referenced. The text implies that only contributions and affordable housing can be negotiated and that the additional policy requirements in the CERLP are non-negotiable and prioritised. Consideration of viability should cover all policies.	Yes
PINS_40/21/LC/S	Laura Miller	WSP on behalf of Peel	Online	Development Management DPD	Chapter 15	DM59	N/A	166	LC	S		Does not object to the additional wording that has been added to the policy. Consider it Sound.	No
PINS_49/12/LC/US	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	Development Management DPD	Chapter 15	DM59	N/A	166	LC	US		Supports the wording of the text but 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. Therefore, should this flexibility be removed from Policy DM59, the Policy risks not being effective and, thus, unsound	Yes
PINS_49/13/LC/US	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	Development Management DPD	Chapter 16	DM60	N/A	169	LC	US		Respondent does not object to DM60 as currently worded. 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.	Yes
PINS_40/22/LC/S	Laura Miller	WSP on behalf of Peel	Online	Development Management DPD	Chapter 16	DM61	N/A	171	LC	S		Supports requirement 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. Considers policy to be Sound.	No
PINS_49/14/LC/US	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	Development Management DPD	Chapter 16	DM61	N/A	171	LC	US		Respondent acknowledges importance of cycling and walking. Respondent understands that to LTN1/20 is very much set up as guidance and best practice but is not true standards. Therefore, there should be flexibility in applying this, particularly considering the topography of certain sites, such as the North Lancaster Strategic Site. Respondent anticipates that any measures regarding cycling and walking would be agreed on an application-by-application basis.	Yes

PINS_13/12/LC/US	Hannah Gradwell	Cushman & Wakefield	Online	Development Management DPD	Chapter 16	DM62	All	N/A	LC	US		The additional requirements for EV electricity provision to be generated by renewables has not been factored into the VA.	tbc
PINS_39/18/LC/US	Peter Dutton	Gladman	Online	Development Management DPD	Chapter 16	DM62	N/A	174	LC	US		No specific comments to make on the amendments made but would welcome assurance that there is sufficient flexibility for future technologies and enhancement. Respondent also recognises intention to prepared and EV SPD. Any policy requirements should be based on up to date and accurate cost information.	tbc
PINS_40/23/LC/US	Laura Miller	WSP on behalf of Peel	Online	Development Management DPD	Chapter 16	DM62	N/A	174	LC	US		Respondent supports the addition of the policy wording in Policy DM62 in relation to EVCPs and cycle parking but considers there should be flexibility. Have reservations regarding the type of cycle parking provision required. Considers the 'covered and secure' spaces as set out in Appendix E to be a significant requirements which may affect viability. Should be more flexible.	tbc
PINS_49/15/LC/US	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	Development Management DPD	Chapter 16	DM62	N/A	174	LC	US		Respondent states that in terms of EV specifications, no details of the specifications are set out in the Viability Assessment. Therefore, the respondent considers that the requirements have not yet been robustly tested as viable and deliverable. Respondent also states that the Council must clarify that, where electric vehicle charging infrastructure is considered to impact upon the historic environment, the requirement for such infrastructure can be reduced. Respondent states that requirements introduced by the CELPR 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.	tbc
PINS_51/12/LC/US	Joanne Harding	Home Builders Federation (HBF)	Online	Development Management DPD	Chapter 16	DM62	N/A	174	LC	US		Respondent states that it is not necessary for the Council to specify provision of EVCPs because of the Government's changes to Building Regulations.	Yes
PINS_30/11/NLC/US	Hannah Richins	Story Homes, Care of Agent	Online	Development Management DPD	Chapter 16	DM62	N/A	174	NLC	US		DM62 contradicts DM30a and the energy hierarchy.	Yes
PINS_49/16/LC/US	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	Development Management DPD	Chapter 16	DM64	N/A	179	LC	US		Respondent supports the need for contributions to the delivery of new infrastructure to be reasonable and directly related to the development proposed but would not support any infrastructure requirement that would threaten the viability and/or deliverability of the site. Acknowledges DM58 mechanism.	Yes
PINS_08/02/LC/US	Charles Ainger	N/A	Online	Development Management DPD	N/A	ALL	N/A	N/A	LC	US		Where the DPD proposes phasing for improvements in sustainability, carbon reduction, transport modal shift, and climate resilience, the respondent is concerned this will allow unsustainable practices in relation to continue for too long. Respondent states that developers will always argue against change; but the cheapest way to do the necessary adaptation will be to go for the right standards from the start. Retrofitting new developments in a few year's time, at a cost much greater than building to the right standards from the start will be unaffordable.	tbc
PINS_13/13/LC/US	Hannah Gradwell	Cushman & Wakefield	Online	Development Management DPD	N/A	N/A	ALL	N/A	LC	US		Significant concerns that the introduction of more stringent climate related policies will result in other local policies being compromised as it has not been demonstrated that they are viable. There is a lack of flexibility throughout the policies to allow for deviation for practical or viability reasons, this flexibility should be added into each policy.	tbc
PINS_15/02/LC/S	Mary Breakell		Online	Development Management DPD	N/A	N/A	N/A	N/A	LC	S		DPD Sound	No
PINS_19/01/LC/S	Elizabeth Dawson		Online	Development Management DPD	N/A	N/A	N/A	N/A	LC	S		DPD Sound	No
PINS_21/01/LC/S	Elizabeth Mills		Online	Development Management DPD	N/A	N/A	N/A	N/A	LC	S		DPD Sound	No
PINS_25/01/LC/S	Dr JKA Woodward		Online	Development Management DPD	N/A	N/A	N/A	N/A	LC	S		DPD Sound	No
PINS_26/01/LC/S	Sarah McGowan		Online	Development Management DPD	N/A	N/A	N/A	N/A	LC	S		DPD Sound	No
PINS_33/01/LC/S	Rosemary Hindley		Online	Development Management DPD	N/A	N/A	N/A	N/A	LC	S		DPD Sound	No
PINS_36/02/LC/S	Tom Jackson		Online	Development Management DPD	N/A	N/A	N/A	N/A	LC	S		DPD Sound.	No
PINS_46/01/LC/US	Diane Coward	Scotforth Parish Council	Online	Development Management DPD	N/A	N/A	N/A	N/A	LC	US		Welcomes amendments in particular the recognition of the importance of GBI however respondent finds the scope and size of the GBI still too vague and corridors too squeezable and that developers will only do the minimum to give the perception of green space. Bolder planning policies are considered necessary to redress the balance of power between developers and local residents living in the spaces.	tbc
PINS_30/12/NLC/US	Hannah Richins	Story Homes, Care of Agent	Online	Development Management DPD	zAppendix D	Appendix D	N/A	198	NLC	US		Appendix D- no justification for change in dwelling number thresholds. Notes that the changes to financial contributions in Table D.2 do not have a financial evidential basis. The representation is supported by additional evidence provided by Cushman and Wakefield in respect of the Cumbria House Builders Association. This is addressed separately under representation reference PINS_13/01/LC/US.	Yes
PINS_51/13/LC/US	Joanne Harding	Home Builders Federation (HBF)	Online	Development Management DPD	zAppendix D	Appendix D	N/A	198	LC	US		Respondent states that appendix D 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.	Yes
PINS_42/05/LC/S	Andrew Leyssens	United Utilities	Online	Development Management DPD & GBI Strategy	N/A	N/A	N/A	N/A	LC	S		Welcome further opportunities to discuss the approach to BNG and keen to ensure that BNG is delivered in the most appropriate locations and without restricting the potential future expansion and operation of key operational infrastructure	No
PINS_45/09/LC/US	Mark Aylward	Aylward Planning on behalf of Derwent Development Management Ltd,	Online	DM30a User Guide	Chapter 09	DM30b	N/A	78	LC	US		The User Guide should clarify the intent of the emerging policy as it relates to "places to work". It is highly regrettable that the User Guide makes no mention of economic development.	tbc
PINS_49/26/LC/S	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	GBI Strategy	N/A	N/A	N/A	N/A	LC	S		Respondent welcomes the clarification of the purpose of the GBI interactive map, and the recognition that the GBI interactive map does not allocate or designate land like a Local Plan Policies Map does.	No

PINS_16/06/LC/S	Amy Kennedy	Natural England	Online	Habitat Regulations Assessment		N/A	N/A	N/A	N/A	LC	S		Concur with the conclusions of the HRA Screening Report and have no further comments to make.	No
PINS_49/25/LC/S	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	Policies map		N/A	N/A	N/A	N/A	LC	S		Respondent notes that a Green and Blue Corridor is now depicted crossing the North Lancaster Strategic Site.	No
PINS_42/02/LC/US	Andrew Leyskens	United Utilities	Online	SFRA (2021)		N/A	SFRA(2021)	N/A	N/A	LC	US		Wish to highlight the higher risk to some allocated sites from public sewer flood risk. The site assessments should be updated.	tbc
PINS_45/01/LC/US	Mark Aylward	Aylward Planning on behalf of Derwent Development Management Ltd,	Online	Strategic Policies & Land Allocations DPD	Chapter 02	N/A	2.8-2.10	15		LC	US		Respondent considers that as worded this fails to give any weight to the substantial viability challenge to the delivery of jobs and that investment. States LCC has not amended text as they respondent requested at Reg18.	tbc
PINS_40/02/LC/S	Laura Miller	WSP on behalf of Peel	Online	Strategic Policies & Land Allocations DPD	Chapter 04	S02	N/A	22		LC	S		Respondent endorses LCCs approach in this policy. Consider the additional wording to be appropriate.	No
PINS_40/03/LC/S	Laura Miller	WSP on behalf of Peel	Online	Strategic Policies & Land Allocations DPD	Chapter 04	S03	N/A	22		LC	S		Respondent considers this element of the plan to be positively prepared and fully consistent with paragraph 35 and 92 of the NPPF and is considered to be sound	No
PINS_40/04/LC/S	Laura Miller	WSP on behalf of Peel	Online	Strategic Policies & Land Allocations DPD	Chapter 04	SO5	N/A	24		LC	S		Respondent considers this element of the plan to be positively prepared and fully consistent with paragraph 35 and Chapter 9 of the NPPF and is considered to be sound	No
PINS_11/06/LC/US	Councillor Keith Reed	Silverdale Parish Council	Online	Strategic Policies & Land Allocations DPD	Chapter 06	CC1	N/A	28		LC	US		Respondent states that Policy CC1 should be put into the explanatory text.	tbc
PINS_14/01/LC/US	Tony Breakell		Online	Strategic Policies & Land Allocations DPD	Chapter 06	CC1	N/A	28		LC	US		Most housing development, especially in south Lancaster, remains concentrated on greenfield sites. The CELPR has not changed this and an effective response to the Climate Emergency since it clashes with objective 7 of CC1 (soil), objective 6 (flood risk - i.e. the risk to Galgate from road and housing developments), objective 3 (modal transport shift - dispersed low density greenfield developments are not compatible with effective public transport systems) and objective 2 (mitigating emissions - the proposed M6 Junction 33 road scheme will encourage more not less car usage). Policy CC1 is fine as far as it goes but it represents a 'bolt-on' to the previous DPD when a thorough review of the whole plan is called for & should include pdl only for housing development -sites such as city centre carparks should be considered - these should become superfluous with modal shift and would enable house building close to city centre places of work.	tbc
PINS_16/01/LC/S	Amy Kennedy	Natural England	Online	Strategic Policies & Land Allocations DPD	Chapter 06	CC1	N/A	28		LC	S		Support the introduction of this policy, and welcome the inclusion of new wording which acknowledges the importance of soil as a natural resource which should be protected, and can contribute to mitigating climate change through carbon storage and sequestration.	No
PINS_30/01/NLC/US	Hannah Richins	Story Homes, Care of Agent	Online	Strategic Policies & Land Allocations DPD	Chapter 06	CC1	N/A	28		NLC	US		Welcomes LCC's amendment to CC1 following Reg 18 rep but still considers it not to be a policy but instead a mission statement. The policy is considered to be ambiguous and is not considered to provide a clear purpose in the decision making process.	Yes
PINS_31/01/LC/US	Stephen Harris	Wainhomes c/o Emery Planning	Online	Strategic Policies & Land Allocations DPD	Chapter 06	CC1	N/A	28		LC	US		CC1- The policy is a statement of intent of the LPA as well as encompassing the national agenda. The policy is not considered to be necessary as the actual policy requirements are either set out in national policy/requirements or in policies in the Local Plan. The policy should be deleted and added as a vision.	Yes
PINS_39/01/LC/US	Peter Dutton	Gladman	Online	Strategic Policies & Land Allocations DPD	Chapter 06	CC1	N/A	28		LC	US		Policy is largely unchanged from Reg 18. Policy should acknowledge how Climate Change matters will change on a site by site basis. Welcomes the assurance that flexibility has been added into policy CC1 and the removal of the final paragraph as suggested in previous Reg18 comments.	tbc
PINS_40/05/LC/NS	Laura Miller	WSP on behalf of Peel	Online	Strategic Policies & Land Allocations DPD	Chapter 06	CC1	N/A	28		LC	US		Supportive of CC1 overall but should be reworded to consider viability of schemes.	tbc
PINS_44/01/LC/US	Helen Clarkson	CBRE Limited on behalf of Lancaster University.	Online	Strategic Policies & Land Allocations DPD	Chapter 06	CC1	N/A	28		LC	US		Supports the aspirations of the CELPR and continues to support the introduction of Policy CC1 but considers it could go further to explicitly support renewable energy as a driver of the district's ambitions for carbon neutrality and on the commitment of LCC to working with major institutions to address the climate emergency and lead on sustainable growth. The inclusion of reference to renewable energy within this policy would, at a strategic level, establish the support for such projects that Policy DM53 relates to. Respondent suggests wording to align with NPPF.	Yes
PINS_48/02/LC/US	Jack Spees	Lancashire Local Nature Partnership	Online	Strategic Policies & Land Allocations DPD	Chapter 06	CC1	N/A	28		LC	US		The language in CC1 is progressive but should include reference to re-balancing in order to be more sustainable. On point 4, the baseline position is a key factor in the context of net gain - environmental or biodiversity. Depleted low baselines may mean little actual gain being realised. Corrected or back-cast baselines for biodiversity, for example, may therefore have merit. This recommendation is in the context of a declared emergency, which is the overarching context for this review. The idea of past baselines (modelled or using calculations, species/habitat population and/or area factors) should be investigated by LCC and partners.	tbc
PINS_49/17/LC/US	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	Strategic Policies & Land Allocations DPD	Chapter 06	CC1	N/A	28		LC	US		Supports the intention of CC1 however considers flexibility has been removed and could impact on viability of new housing development.	Yes
PINS_51/01/LC/US	Joanne Harding	Home Builders Federation (HBF)	Online	Strategic Policies & Land Allocations DPD	Chapter 06	CC1	N/A	28		LC	US		Respondent consider the Policy is more of a statement/ vision than a necessary policy. Considers it repeats other policies in the plan. Suggests policy is deleted.	Yes
PINS_11/05/LC/US	Councillor Keith Reed	Silverdale Parish Council	Online	Strategic Policies & Land Allocations DPD	Chapter 06, Chapter 08, Chapter 23	CC1, SP4, SP8, SC4	N/A	28, 38, 54, 181		LC	US		Additional and repetitive policies will be difficult to take into account. Much of the wording should not be in policy as it forms visions and objectives, of example support and reference to additional work which should be in the supporting text.	tbc
PINS_17/01/LC/US	Matthew Wyatt	PWA Planning	Online	Strategic Policies & Land Allocations DPD	Chapter 07, Chapter 09, Chapter 20	SP2, SP3, SP6, H2	N/A	30, 36, 49, 136		LC	US		Doesn't consider that the CELPR allocates enough land to fulfil policy requirements of SP2, SP3, SP6 and H2 and therefore respondent looks to promote two sites for allocation in Caton & Brookhouse. Detail of both sites submitted with rep.	tbc
PINS_45/02/LC/US	Mark Aylward	Aylward Planning on behalf of Derwent Development Management Ltd,	Online	Strategic Policies & Land Allocations DPD	Chapter 08	N/A	8.5	37		LC	US		Respondent considers that as worded this fails to give any weight to the substantial viability challenge to the delivery of economic growth. States LCC has not amended text as they respondent requested at Reg18.	tbc

PINS_09/01/LC/US	Leith Planning Ltd on behalf of EPC-UK	EPC-UK	Online	Strategic Policies & Land Allocations DPD	Chapter 08	SP4	N/A	38	LC	US		Respondent states Policy SP4 does not sufficiently protect and promote existing business operations as set out within the NPPF and does not adequately protect community safety in relation to hazard sites. Respondent supports the updated Policy in principle but wish to see the following sentence add to the end of the policy "...and do not result in detrimental impacts on existing businesses within the Plan Area".	tbc
PINS_11/07/LC/US	Councillor Keith Reed	Silverdale Parish Council	Online	Strategic Policies & Land Allocations DPD	Chapter 08	SP4	N/A	38	LC	US		Policy SP4 should be reworded to make it clear how the parts of the policy are to be achieved through the planning system.	tbc
PINS_39/02/LC/US	Peter Dutton	Gladman	Online	Strategic Policies & Land Allocations DPD	Chapter 08	SP4	N/A	38	LC	US		No specific comments to make on the further changes to SP4 other than supporting local food supply chains should be recognised in the context of wider sustainable development. The respondent continues to welcome the councils aspiration to develop and appropriate skills base, but says the lack of a sufficiently skilled workforce is likely to be potential constraint that could affect delivery of higher/alternative building standards when compared to current processes.	tbc
PINS_44/02/LC/S	Helen Clarkson	CBRE Limited on behalf of Lancaster University.	Online	Strategic Policies & Land Allocations DPD	Chapter 08	SP4	N/A	38	LC	S		Welcomes changes to the policy but 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' and suggests amendments to wording.	No
PINS_30/02/NLC/US	Hannah Richins	Story Homes, Care of Agent	Online	Strategic Policies & Land Allocations DPD	Chapter 08	SP8	N/A	52	NLC	US		The amendment to SP8 is welcomed but charging schedule for BNG should be added. It is not considered to be based on robust evidence until then. The response notes that it is unclear as to whether the 10% BNG requirement has been included.	Yes
PINS_37/01/LC/S	Nick Horsley	Mineral Products Association (MPA)	Online	Strategic Policies & Land Allocations DPD	Chapter 09	N/A	9.7	43	LC	S		Respondent request update reference from 2012 NPPF to 2021 NPPF	No
PINS_37/02/LC/S	Nick Horsley	Mineral Products Association (MPA)	Online	Strategic Policies & Land Allocations DPD	Chapter 09	N/A	9.19	45	LC	S		The plan estimates a need for a minimum of 12,000 houses. The council should undertake a resource assessment to estimate the demand for minerals to meet the council's aspirations as well as considering the supply chain requirements in terms of an appropriate supply chain audit. This should be done through close liaison with Lancashire County Council	No
PINS_37/03/LC/S	Nick Horsley	Mineral Products Association (MPA)	Online	Strategic Policies & Land Allocations DPD	Chapter 10	SP7	N/A	49	LC	S		We support the council's approach in the production of a district wide Heritage Strategy. The strategy must consider local vernacular and identify how the need to maintain this will be addressed. The council must work with LCC and the minerals industry in ensuring local vernacular is maintained.	No
PINS_11/08/LC/US	Councillor Keith Reed	Silverdale Parish Council	Online	Strategic Policies & Land Allocations DPD	Chapter 10	SP8	N/A	54	LC	US		References to working with others on the local nature recovery strategy and the map in policy SP8 should be deleted and put into supporting text.	tbc
PINS_16/02/LC/S	Amy Kennedy	Natural England	Online	Strategic Policies & Land Allocations DPD	Chapter 10	SP8	N/A	52	LC	S		Support the proposed changes to this policy, and welcome the inclusion of new wording which directly references the National Nature Recovery Network, alongside the Local Nature Recovery Strategy.	No
PINS_39/03/LC/US	Peter Dutton	Gladman	Online	Strategic Policies & Land Allocations DPD	Chapter 10	SP8	N/A	52	LC	US		No specific comments to make on SP8 but highlight their current development proposals at Bailrigg Lane in South Lancaster and how these have been designed to ensure they enhance and retain GBI.	tbc
PINS_40/06/LC/US	Laura Miller	WSP on behalf of Peel	Online	Strategic Policies & Land Allocations DPD	Chapter 10	SP8	N/A	52	LC	US		Policy should be amended to say environment act rather than environment bill . Also concerned over the phrase 'spaces'. The green and blue 'Spaces' are not clearly shown or defined within the plan and a clear definition of what the 'spaces' comprises is therefore required. Also don't support some of the wording. Suggest 'nature recovery' should be removed.	tbc
PINS_44/03/LC/S	Helen Clarkson	CBRE Limited on behalf of Lancaster University.	Online	Strategic Policies & Land Allocations DPD	Chapter 10	SP8	N/A	52	LC	S		Welcomes the additional wording to the policy.	No
PINS_48/04/LC/US	Jack Spees	Lancashire Local Nature Partnership	Online	Strategic Policies & Land Allocations DPD	Chapter 10	SP8	SP8	54	LC	US		Respondent notes the improved text and recommends that the Environment Act 2021 is also referred to. The respondent acknowledges the role of nature in planning for resilience and biodiversity net gain and nature recovery. This review provides the opportunity for LCC to redefine "development" away from a one dimensional sense of economic growth. Recognising that the environment not only has intrinsic value but has capital value – Natural Capital. Redefining what development means in the context of a climate emergency may well be to place equal or greater values on Natural Capital - water, species, woodland, moorland particularly with regard to how Natural Capital can contribute to climate change mitigation and adaptation.	tbc
PINS_49/18/LC/US	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	Strategic Policies & Land Allocations DPD	Chapter 10	SP8	N/A	52	LC	US		Agrees with principle of GBI on housing sites but it would need to be proportionate and take account of site specifics. Respondent could not support a GBI requirement that threatens viability or housing sites in general and there must be flexibility within the policy. CELPR policy requirements should not undermine the delivery of the Masterplan for the North Lancaster strategic site.	Yes
PINS_39/04/LC/US	Peter Dutton	Gladman	Online	Strategic Policies & Land Allocations DPD	Chapter 11	SP10	N/A	56	LC	US		No specific comments to make on SP10 but highlight their current development proposals at Bailrigg Lane in South Lancaster and how this will incorporate walking and cycling, including potential to deliver combined active travel corridors and greenspaces in support of the aspirations set out in the Council's Future GBI Action Plan.	tbc
PINS_44/04/LC/S	Helen Clarkson	CBRE Limited on behalf of Lancaster University.	Online	Strategic Policies & Land Allocations DPD	Chapter 11	SP10	N/A	56	LC	S		Respondent states that Policy SP10 should reflect the critical importance of major infrastructure projects in the district, which have the potential to unlock sustainable development and support the delivery of new sustainable travel infrastructure. Strong support for J33 realignment and respondent requests that the need for the realignment of J33 is clearly and explicitly articulated in the CELPR, in Policy SP10 and elsewhere in the plan (including Polices T1, T2 and T4).	No
PINS_49/19/LC/US	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	Strategic Policies & Land Allocations DPD	Chapter 11	SP10	N/A	56	LC	US		Does not object to the principle of promoting active travel. CELPR policy requirements should not undermine the delivery of the Masterplan for the North Lancaster strategic site. Respondent reserves the right to comment on SP10 and other policies once the County Council's Movement Strategy has been published.	Yes
PINS_31/02/LC/US	Stephen Harris	Wainhomes c/o Emery Planning	Online	Strategic Policies & Land Allocations DPD	Chapter 11	SP9	N/A	55	LC	US		SP9- the need for the additional paragraph in Policy SP9 is questioned on the basis that it is a statement of intent with the main policy requirements elsewhere in the plan, policy should be deleted.	Yes
PINS_40/07/LC/S	Laura Miller	WSP on behalf of Peel	Online	Strategic Policies & Land Allocations DPD	Chapter 11	SP9	N/A	55	LC	S		Support the policy additions and therefore consider the policy to be positively prepared and fully consistent with paragraph 35 of the NPPF so is considered to be sound.	No
PINS_51/02/LC/US	Joanne Harding	Home Builders Federation (HBF)	Online	Strategic Policies & Land Allocations DPD	Chapter 11	SP9	N/A	55	LC	US		Respondent supports the provision of low-carbon, energy efficient homes, but considers that this should be done in line with Government plans to introduce this through national standards and building regulations. Respondent states that this will avoid unnecessary duplication or inconsistencies in policies.	Yes
PINS_37/04/LC/S	Nick Horsley	Mineral Products Association (MPA)	Online	Strategic Policies & Land Allocations DPD	Chapter 12	N/A	12.1 & 12.2	59	LC	S		Respondent request update reference from 2012 NPPF to 2021 NPPF	No
PINS_37/05/LC/S	Nick Horsley	Mineral Products Association (MPA)	Online	Strategic Policies & Land Allocations DPD	Chapter 12	SG1	N/A	60	LC	S		Response relates to BGV and respondent states that the council should undertake a resource assessment to estimate the demand for minerals to meet the council's aspirations as well as considering the supply chain requirements in terms of an appropriate supply chain audit. This should be done through close liaison with LCC.	No



PINS_39/05/LC/US	Peter Dutton	Gladman	Online	Strategic Policies & Land Allocations DPD	Chapter 12	SG1	N/A	60	LC	US		Welcome the proposal to add a definition for Better Buses to the glossary. Respondent notes that no s106 costs have been added into the additional South Lancaster VA testing and state that the council must ensure that this approach to viability testing is appropriately reflected in the Council's approach to the CELPR and the testing of its policy requirements and whether it supports their application.	tbc
PINS_41/01/LC/S	Gavin Rutter	Canal & River Trust	Online	Strategic Policies & Land Allocations DPD	Chapter 13	N/A	13.9	73	LC	S		Welcomes reference to canal in context of regeneration and GBI networks.	No
PINS_41/02/LC/S	Gavin Rutter	Canal & River Trust	Online	Strategic Policies & Land Allocations DPD	Chapter 13	SG4	N/A	71	LC	S		Welcomes reference that the Town Centre strategy will seek enhancement to the GBI network both within and connecting to the network.	No
PINS_37/06/LC/S	Nick Horsley	Mineral Products Association (MPA)	Online	Strategic Policies & Land Allocations DPD	Chapter 13	SG5 & SG6	N/A	74, 78	LC	S		Response relates to Canal Quarter & Lancaster Castle and Quay site- the council must work with LCC and the minerals industry in ensuring local vernacular is maintained.	No
PINS_37/07/LC/S	Nick Horsley	Mineral Products Association (MPA)	Online	Strategic Policies & Land Allocations DPD	Chapter 14	SG7	N/A	80	LC	S		Response related to East Lancaster Strategic site. Respondent states they had difficult viewing SG7 on the interactive map to see the impacts on a recognised MSA. They state the council should undertake a resource assessment to estimate the demand for minerals to meet the council's aspirations as well as considering the supply chain requirements in terms of an appropriate supply chain audit. This should be done through close liaison with LCC.	No
PINS_37/08/LC/S	Nick Horsley	Mineral Products Association (MPA)	Online	Strategic Policies & Land Allocations DPD	Chapter 15	SG9	N/A	88	LC	S		Response relates to North Lancaster Strategic Site. They stated that the council should undertake a resource assessment to estimate the demand for minerals to meet the council's aspirations as well as considering the supply chain requirements in terms of an appropriate supply chain audit. This should be done through close liaison with LCC.	No
PINS_49/20/LC/S	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	Strategic Policies & Land Allocations DPD	Chapter 15	SG9	N/A	88	LC	S		Notes that no changes are proposed to this policy. Considers policy is sound as drafted.	No
PINS_37/09/LC/S	Nick Horsley	Mineral Products Association (MPA)	Online	Strategic Policies & Land Allocations DPD	Chapter 16	SG11	N/A	96	LC	S		Response relates to Land at Lundsfield Quarry Site. They stated that the council should undertake a resource assessment to estimate the demand for minerals to meet the council's aspirations as well as considering the supply chain requirements in terms of an appropriate supply chain audit. This should be done through close liaison with LCC.	No
PINS_37/10/LC/S	Nick Horsley	Mineral Products Association (MPA)	Online	Strategic Policies & Land Allocations DPD	Chapter 17	SG12, SG13	N/A	101, 103	LC	S		Respondent notes that policies SG12 and SG13 recognise that future proposals should seek to address all relevant elements of the Local Plan and have due regard to the direction of Lancashire County Council's Waste and Minerals Plan. It is clear that the wider strategy outlined in the plan should achieve this not just for the Lancashire M&WLP, but the minerals policies contained in the NPPF.	No
PINS_37/11/LC/S	Nick Horsley	Mineral Products Association (MPA)	Online	Strategic Policies & Land Allocations DPD	Chapter 18	EC1	N/A	107	LC	S		Typo. Amend to say Employment.	No
PINS_45/03/LC/US	Mark Aylward	Aylward Planning on behalf of Derwent Development Management Ltd,	Online	Strategic Policies & Land Allocations DPD	Chapter 18	EC1	N/A	107	LC	US		Respondent states that LCC has not made changes they recommended to this policy in relation to use class order and how other types of use could be acceptable.	tbc
PINS_45/04/LC/US	Mark Aylward	Aylward Planning on behalf of Derwent Development Management Ltd,	Online	Strategic Policies & Land Allocations DPD	Chapter 18	N/A	18.21	111	LC	US		Respondent requests that the wording of para 18.21 is amended and use a more flexible and pragmatic framework.	tbc
PINS_46/02/LC/x	Diane Coward	Scotforth Parish Council	Online	Strategic Policies & Land Allocations DPD	Chapter 22	EN6	N/A	171	LC	US		Respondent would like to see EN6 strengthened to explicitly retain green buffer reference. Settlements of Burrow Heights and Lower Burrow should also be referenced so they are not submerged by the BGV.	tbc
PINS_11/09/LC/US	Councillor Keith Reed	Silverdale Parish Council	Online	Strategic Policies & Land Allocations DPD	Chapter 23	SC4	N/A	, 181	LC	US		Respondent states key policy relating to Green and Blue Infrastructure (SC4.) does not include the part of the Silverdale and Arnside AONB within Lancaster. or linked open spaces LCC's justification in topic paper 2 mistakenly assumes that the only reason for designation as GBI is protection from development, whereas the policies refer to improving and enhancing the multifunctionality and connectivity within these corridors and chains and the linkages between them. Policy SC4 and accompanying maps should be amended to make it clear that Silverdale and/or the AONB are covered by it, in order to allow the full benefits of Green and Blue infrastructure are realised in the future.	tbc
PINS_16/03/LC/S	Amy Kennedy	Natural England	Online	Strategic Policies & Land Allocations DPD	Chapter 23	SC4	N/A	181	LC	S		Support the proposed changes to this policy, and welcome the introduction of new paragraph 7, which highlights the importance of connectivity and multifunctionality, and also new paragraph 8, which signposts the Council's GBI Toolkit in relation to climate change mitigation / adaptation and nature-based solutions.	No
PINS_39/06/LC/US	Peter Dutton	Gladman	Online	Strategic Policies & Land Allocations DPD	Chapter 23	SC4	N/A	181	LC	US		No specific comments to make on SC4 but highlight their current development proposals at Bailrigg Lane in s Lancaster has the potential to enhance the chain of green and blue spaces along Burrow Beck.	tbc
PINS_40/08/LC/US	Laura Miller	WSP on behalf of Peel	Online	Strategic Policies & Land Allocations DPD	Chapter 23	SC4	N/A	181	LC	US		concerns over the use of the GBI Toolkit as it is currently unclear how the toolkit would be used in relation to the assessment of the mitigation/adaption value of green and blue infrastructure. Respondent also states that Figure 23.2 also needs to be updated as it currently misses a section of the Lancaster Canal, adjacent to the site area. The figure is currently incorrect and does not illustrate the existing green and blue chains and corridors correctly.	tbc
PINS_44/08/LC/S	Helen Clarkson	CBRE Limited on behalf of Lancaster University.	Online	Strategic Policies & Land Allocations DPD	Chapter 23	SC4	N/A	181	LC	S		Acknowledges and supports additional explanatory text to explain purpose of policy SC4 as requested at Reg 18. However comments about River Conder and potential for renewable energy generation remain as River Conder identified as GBI corridor. Uni generally supportive of a strategy to enhance GBI and in improving accessibility to lower stretches of the River Conder. GBI Strategy and this policy need to be cognisant of District's renewable energy aspirations and areas of District identified as suitable for renewable energy generation. Sustainable development of existing active uses within green corridors (such as Forest Hills) have potential to improve accessibility and use of these areas and sensitive and sustainable development of these types if uses should be safeguarded and measured against their opportunity to support sustainable growth and innovation.	No
PINS_48/03/LC/S	Jack Spees	Lancashire Local Nature Partnership	Online	Strategic Policies & Land Allocations DPD	Chapter 23	SC4	SC4	181	LC	S		Change in relation to Green and Blue corridors and chains is noted.	No
PINS_49/21/LC/US	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	Strategic Policies & Land Allocations DPD	Chapter 23	SC4	N/A	181	LC	US		Respondent doesn't object to amendments to SC4. CELPR policy requirements should not undermine the delivery of the Masterplan for the North Lancaster strategic site.	Yes
PINS_44/05/LC/S	Helen Clarkson	CBRE Limited on behalf of Lancaster University.	Online	Strategic Policies & Land Allocations DPD	Chapter 24	T1	N/A	186	LC	S		Respondent requests that the need for the realignment of J33 is clearly and explicitly articulated in the CELPR, in T1.	No

PINS_39/07/LC/US	Peter Dutton	Gladman	Online	Strategic Policies & Land Allocations DPD	Chapter 24	T2	N/A	186	LC	US	Note the amendments to the supporting text on LTN1/20 and welcome the acknowledgment that this should be achieved wherever possible, recognising that this may not be suitable of feasible in all circumstances. Welcome the inclusion of similar wording in the main body of the policy.	tbc
PINS_40/09/LC/US	Laura Miller	WSP on behalf of Peel	Online	Strategic Policies & Land Allocations DPD	Chapter 24	T2	N/A	186	LC	US	Overall support additions to T2 but should always be on a site by site basis. Agree with concept of cycle superhighway. Policy refers to use of off-site contributions and the need for these to be secured to ensure future growth is well connected to the network however this may have viability implications. Respondent states that the word 'secure' should also be removed as secure cycle parking bike lockers can be a more substantial undertaking for developers.	tbc
PINS_44/06/LC/S	Helen Clarkson	CBRE Limited on behalf of Lancaster University.	Online	Strategic Policies & Land Allocations DPD	Chapter 24	T2	N/A	192	LC	S	Respondent requests that the need for the realignment of J33 is clearly and explicitly articulated in the CELPR, in T2.	No
PINS_49/22/LC/US	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	Strategic Policies & Land Allocations DPD	Chapter 24	T2	N/A	192	LC	US	Notes that no changes have been made to the policy but notes the changes to the supporting text at New Paragraph 11. Respondent considers that LTN1/20 is set up as guidance but not standards and therefore there should be flexibility in applying this and measures should be considered on a site by site basis.	Yes
PINS_30/03/NLC/US	Hannah Richins	Story Homes, Care of Agent	Online	Strategic Policies & Land Allocations DPD	Chapter 24	T4	N/A	193	NLC	US	More evidence needed in relation to Policy T4.	Yes
PINS_39/08/LC/US	Peter Dutton	Gladman	Online	Strategic Policies & Land Allocations DPD	Chapter 24	T4	N/A	193	LC	US	Respondent welcomes the revision to this policy.	tbc
PINS_40/10/LC/US	Laura Miller	WSP on behalf of Peel	Online	Strategic Policies & Land Allocations DPD	Chapter 24	T4	N/A	193	LC	US	Respondent welcomes the change to Policy T4 (considered on a site by site basis now). Supports additional wording to supporting text on ensuring safe walking and cycling distances but wishes to see an element of flexibility applied on a site by site basis. Also wish to see term 'secure' removed in relation to cycle parking. In addition whilst the Council should encourage delivery of public transport services, it should not be a requirement of policy.	tbc
PINS_44/07/LC/S	Helen Clarkson	CBRE Limited on behalf of Lancaster University.	Online	Strategic Policies & Land Allocations DPD	Chapter 24	T4	N/A	193	LC	S	Respondent requests that the need for the realignment of J33 is clearly and explicitly articulated in the CELPR, in T4.	No
PINS_45/05/LC/US	Mark Aylward	Aylward Planning on behalf of Derwent Development Management Ltd,	Online	Strategic Policies & Land Allocations DPD	Chapter 24	T4	N/A	193	LC	US	Respondent states that the policy sets 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. LCC also need to consider if promoting public transport is the best option. Respondent states that there may also be significant costs associated with this requirement which may affect viability. Measures should be considered on a case by case basis.	tbc
PINS_49/23/LC/US	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	Strategic Policies & Land Allocations DPD	Chapter 24	T4	N/A	196	LC	US	Respondent pleased to note the amendment to this policy however state that it is not always possible to provide a new or enhanced service where there is a current deficiency. Respondent considers the wording should be adjusted so measures are developed on a site by site basis. In relation to new para 14, IHT Guidance gives specific distances but notes that direct and simple bus routes are more important than walking distances. In some cases a walking distance a little more than 400m is acceptable and therefore the wording should reflect this.	Yes
PINS_51/03/LC/US	Joanne Harding	Home Builders Federation (HBF)	Online	Strategic Policies & Land Allocations DPD	Chapter 24	T4	N/A	196	LC	US	Respondent states that the policy does not set out how deficiencies in the existing services will be identified or how frequent high-quality services will be defined, and that more detail is needed. Respondent also states that going forward providing additional public transport is not always the most sustainable option, or is only part of the most sustainable option, and this may also need to be considered as part of the determination of a planning application on a case-by-case basis. Respondent states that there may significant costs associated with this and viability should be considered.	Yes
PINS_06/01/LC/S	Cllr Lizzi Collinge	N/A	Online	Strategic Policies & Land Allocations DPD	N/A	ALL	N/A	N/A	LC	S	DPD Sound	No
PINS_08/01/LC/S	Charles Ainger	N/A	Online	Strategic Policies & Land Allocations DPD	N/A	ALL	N/A	N/A	LC	S	DPD Sound	No
PINS_10/01/LC/S	Cherith Adams	N/A	Online	Strategic Policies & Land Allocations DPD	N/A	ALL	N/A	N/A	LC	S	DPD Sound	No
PINS_13/14/LC/US	Hannah Gradwell	Cushman & Wakefield	Online	Strategic Policies & Land Allocations DPD	N/A	N/A	N/A	N/A	LC	US	Significant concerns that the introduction of more stringent climate related policies will result in other local policies being compromised as it has not been demonstrated that they are viable.	tbc
PINS_15/01/LC/S	Mary Breakell		Online	Strategic Policies & Land Allocations DPD	N/A	N/A	N/A	N/A	LC	S	DPD Sound	No
PINS_23/01/LC/S	Dr Gillian Davies		Online	Strategic Policies & Land Allocations DPD	N/A	N/A	N/A	N/A	LC	S	DPD Sound	No
PINS_36/01/LC/S	Tom Jackson		Online	Strategic Policies & Land Allocations DPD	N/A	N/A	N/A	N/A	LC	S	DPD Sound. Make use of brownfield sites before using greenfield sites. Guarantee that any supposedly 'necessary' impact to biodiversity, wildlife, and habitats will be soundly compensated	No
PINS_49/24/LC/S	Georgina Blackburn	Avison Young on behalf of Taylor Wimpey UK Limited	Online	Strategic Policies & Land Allocations DPD	zAppendix A glossary	N/A	N/A	182	LC	S	Notes that the definition of 'better buses' has been added.	No
PINS_16/05/LC/S	Amy Kennedy	Natural England	Online	Sustainability Appraisal	N/A	N/A	N/A	N/A	LC	S	Concur with the conclusions set out within the SA Report and have no further comments to make.	No
PINS_39/19/LC/US	Peter Dutton	Gladman	Online	Sustainability Appraisal	N/A	N/A	N/A	N/A	LC	US	Note that a SA Report has been published alongside the current consultation and test's proposed CELPR amendments. Council should ensure result of SA clearly justify its proposed policy choices and that its clear from the results of the assessment why some policy options have been progressed and others not. SA should include comparative and equal assessment of each reasonable alternative. SA should clearly set out how Council's policy choices have evolved through and objective and iterative process, including consideration of policy alternatives.	tbc

PINS_13/15/LC/US	Hannah Gradwell	Cushman & Wakefield	Online	Viability Assessment & Addendum	N/A	N/A	N/A	N/A	LC	US	The VA does not accord with the NPPF as assumptions are arbitrary, non-market facing, insufficiently evidenced and have not been through an iterative/collaborative process with stakeholders. There is no justification to depart from the assumptions in the LPVA (2018). The VA uses inappropriate and unrealistic inputs which result in the viability being significantly overstated. The VA therefore does not constitute robust or credible evidence. Significant amendment and the review of policies is necessary. The representation refers to their Reg18 response which provides detailed concerns with regard to the inputs, methodology, lack of transparency, errors and where additional clarification/evidence is required. Elements are highlighted and expanded upon within this representation.	tbc
PINS_45/08/LC/US	Mark Aylward	Aylward Planning on behalf of Derwent Development Management Ltd.	Online	Viability Assessment & Addendum	N/A	N/A	N/A	N/A	LC	US	The previous representations to the Reg18 plan are referred to. None of their previous comments have been addressed. The VA clarifies the viability challenge for non-residential development and demonstrates that local market conditions alongside challenging policy objectives will impede delivery. Additional obligations cannot therefore be justified.	tbc
PINS_40/24/LC/US		CBRE on behalf of Peel	Online	Viability Assessment and Addendum	N/A	N/A	N/A	N/A	LC	US	The changes to the NPPF do not justify alternative assumptions to the LPVA (2018). There is a lack of transparency and evidence to support the assumptions used in the LPRVA21 and it contains errors. Disagree with inputs used. The representation sets out the inputs considered appropriate, details the points considered to be errors and areas where additional clarification is sought.	tbc