

Barton Willmore, now Stantec on behalf of Story Homes

Examination into the Lancaster District Local Plan (Climate Emergency Review of the Strategic Policies and Land Allocations Development Plan Document and the Climate Emergency Review of the Development Management Development Plan Document)

Hearing Statement

Matter 7 – Green and Blue Infrastructure

Q7.5 Is Policy SP8 justified and consistent with national policy?

1. No. The policy is neither justified, nor is it consistent with national policy.
2. The Council's viability evidence (P_20.1) makes an allowance for £1,137 per unit greenfield to account for the need to demonstrate biodiversity net gain. It is assumed that this accounts for the upcoming 10% net gain requirement as MHCLG's 2019 report 'Biodiversity net gain and local natural recovery strategies impact assessment' is referenced.
3. However, it is not clear where that figure has come from.
4. Cushman & Wakefield undertook detailed analysis of the Council's viability evidence as part of their Regulation 19 consultation representations on behalf of the Cumbria Housebuilder Association, of which Story Homes is a part of. This analysis identified a number of matters where information was lacking, including in relation to policy SP8. It is understood that Cushman & Wakefield will be providing a Hearing Statement on Matter 8 which will also comment on these deficiencies.
5. The Council's Green and Blue Infrastructure Strategy (P_29.1) refers to the potential of developer contributions being used to improve green and blue infrastructure. However, no costings are listed, and this is not specific to biodiversity net gain.
6. Furthermore, there is anecdotal evidence that the Council is currently seeking circa £15,000 per biodiversity credit in lieu of onsite provision. While it is not clear what evidence has underpinned this request, it is much higher than the assumptions made within the viability assessment.
7. The requirement for 10% biodiversity net gain has the potential of two major impacts on the deliverability of development allocated by the Local Plan.
8. The first is that the land required to provide for onsite provision is such that it reduced the numbers of homes significantly owing to a loss of developable area. This has the potential to impact on the viability as many of the infrastructure requirements would remain the same, but there would be less development to fund it. This is particularly pertinent as other proposed policy

requirements such as solar gain also have the potential to impinge on the net developable area of a site.

9. The second is the expense of making offsite contributions. A significant shortfall could result in a large contribution that would undermine the viability of the development allocated prior to this requirement.
10. The Council should seek to establish a charging schedule relating to biodiversity credits to add clarity and so that robust viability evidence can be produced.

Q7.6 Should reference be made in Policy SP8 to the Environment Act 2021?

11. To ensure that the requirements of the policy comply with the requirements of the Act reference should be included.

Q7.9 What is the evidential basis for the change in dwelling thresholds for on and off-site provision of open space and financial contributions in Appendix D of the Part 2 Plan?

12. No evidential basis appears to be available to justify this change. While the Council's Green and Blue Infrastructure Strategy (P_29.1) references evidence produced by KKP, the only report available appears to be that which informed the original Local Plan. It is therefore not clear how this same evidence can justify a change in open space requirements.

Q7.11 Is Policy DM43 effective and consistent with national policy?

13. No. Full reasoning is set out below in terms of lack of consistency with national policy.

Q7.12 Will all development proposals be expected to integrate green and blue infrastructure and forge linkages with the wider network?

14. The current wording of Policy DM43 is as follows:

"Development proposals must seek to integrate green and blue spaces, corridors and chains onsite and forge linkages with the existing wider green and blue network".

15. A reasonable interpretation of this wording is that all development proposals will be expected to integrate green and blue infrastructure and forge linkages with the wider network.
16. In some circumstances it will not be possible for this to happen. An example of this are proposals for the change of use of a building which would be classified as development.