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

Lancaster South Area Action Plan [AAP]

TOPIC PAPER Consultation Report

Shaping
a better future

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1.0 Introduction

- 1.1 Lancaster City Council adopted its Local Plan in July 2020 after many years of preparation. The new Local Plan contained Policy SG1 which designated a 'Broad Location for Growth' in the South Lancaster area. The Local Plan included the ambitions of the Council in relation to the delivery of a new garden village (South Lancaster was identified by the Government in 2017 as a location for a new settlement). Policy SG1 of the Local Plan designated this area as a location where future growth and development potential would be investigated further and it provided a number of broader development principles (Key Growth Principles) which would assist guiding future development.
- 1.2 The Local Plan and Policy SG1 did not address any matters of detail over how development would be achieved in the South Lancaster area. Given the scale and significance of what was being considered it was felt that these matters could only be satisfactorily addressed through the creation of a new bespoke planning framework for the area – the Lancaster South Area Action Plan DPD.
- 1.3 Work has already commenced on the understanding over how development could be achieved in the South Lancaster area, in 2019 the City Council appointed masterplanning consultants JTP to prepare a masterplan of how development could be achieved as part of a new garden village. After delays in the masterplan's preparation due to the COVID Pandemic, the masterplan has now been completed and endorsed by the City Council in February 2022. The masterplan provides a starting point and illustrates a series of concepts, visions and ambitions which the Area Action Plan will investigate and explore in bringing together a robust and realistic planning framework for the Action Plan area as whole.
- 1.4 Following the completion of the masterplan, the City Council have now formally commenced work on the Area Action Plan. 2022 has been spent seek to build up the evidence which is necessary to inform a robust plan, in terms of the allocations which are made for both development and non-development purposes and the policy direction provided within the Plan.
- 1.5 Further to evidence preparation, the City Council have sought to undertake a series of informal engagement exercises where the views and opinions of key stakeholders have been sought in discussing some of the key issues and challenges around the preparation of an Area Action Plan. This has included engagement with statutory and key stakeholders to the process, such as Natural England, Environment Agency and key infrastructure providers such as Lancashire County Council and United Utilities. The Council have also sought to engage with Parish Councils who could be directly or indirectly affected by the Action Plan and with developers and landowners who have interests in the South Lancaster area.

- 1.6 Finally, the City Council have sought to publish a series of Topic Papers which seek to provide the opportunity to highlight the work which has been undertaken to date, and work which still needs to be done, some of the issues and challenges which need to be addressed in the Action Plan and provide opportunity to explore some of the potential approaches which could seek to address these key issues. The Topic Papers were published for any interested party to comment on, such as those already described but also providing the opportunity for the wider public to input into the preparation process.
- 1.7 The public engagement on the Topic Papers draws the informal engagement process to a close as the Council will now seek to move forward with the preparation of a draft Area Action Plan. The process of this is described in more detail at Section 11 of this Report. Whilst the informal engagement process is now conclude the City Council recognise that the conversations around how the Action Plan should development and evolve are not over, and will be seeking to maintain and expand the dialogue on the Action Plan as it evolves during the course of 2023.

2.0 Purpose and Role of the Topic Papers

- 2.1 The purpose of the topic papers was to set out the necessary background and context on some of the key issues which the Action Plan needs to address. These issues are varied, extensive and at times complex, ranging from the quantum of development, timescales for the Action Plan, the mix and type of housing, infrastructure delivery, the form and layout of development, design, drainage and flood risk. To seek to address the full range of matters in a concise way, a total of six topic papers were prepared on the following subjects:
1. Establishing an Overall Development Strategy for the Area Action Plan
 2. Travel, Transport and Securing Modal Shift
 3. Addressing the Climate Emergency and Community Resilience
 4. Securing Green & Blue Infrastructure and Biodiversity Net Gain
 5. Water Management
 6. Securing Sustainable Places and Communities
- 2.2 The topic papers set out background and context to the issues and explored potential approaches to how these issues could be addressed in the future Plan. The papers were structured around a series of questions posed to the reader where the Council welcomed feedback. There was no require to answer all the questions posed in every topic paper, just the questions which were of most relevance to the reader.

- 2.3 The purpose of the topic papers was twofold, firstly seeking to engage people in the issues and therefore bring a greater understanding of both the process of preparing an Area Action Plan and some of the challenges around preparing the plan. Secondly, to seek responses which would help inform the preparation of the draft Action Plan and begin further engagement and discussion with those interested parties who submitted responses.
- 2.4 The purpose of the topic paper is to explore the planning issues which surround the delivery of new housing, employment and associated infrastructure in the South Lancaster area, as directed by the Local Plan. These are matters which are led by Lancaster City Council as local planning authority for the area. This engagement process is entirely separate to that being pursued by Lancashire County Council, as highways authority, in relation to new transport infrastructure.

3.0 Details of Engagement

- 3.1 The Council published the topic papers on the 9th November 2022 for a eight week period (in light of the engagement period running over Christmas and New Year), concluding on the 9th January 2023. The engagement was publicised through the regular channels via the Council's website and the posts to the Planning Policy Mailing Database.
- 3.2 Given the informal nature of this engagement and the early stage of the Action Plan process no public events were held. It is recognised that public events will be a necessary component of future consultation on a draft Area Action Plan which will contain more detailed policies and allocations. This will require more dialogue with interested parties to convey the content and direction of the Plan and allow time for those parties to discuss their views and concerns on the proposed approaches.

4.0 Topic Paper 1: Establishing a Development Strategy

4.1 Scope of the Topic Paper

- 4.1.1 Topic Paper 1 relates to the establishing a development strategy within the Action Plan. The paper seeks to explore the wide-ranging issues which the Action Plan will need to consider to ensure that it is sound and robust and is consistent with both national and local planning policy.
- 4.1.2 The paper provides background and context to the Action Plan process to date, considering previous work which has been undertaken to explore growth opportunities in South Lancaster (for instance the 2018 South Lancaster Options Consultation and the 2021 Bailrigg Garden Village Masterplan). The paper looks at the policy context for the South Lancaster area derived from the adopted

Lancaster District Local Plan (2020) and it also identifies the key elements from national planning policy (the National Planning Policy Framework) which are applicable to the preparation of the Plan.

- 4.1.3 The paper provides a starting point in relation to describing the potential vision and objectives for the Action Plan which will guide its content to ensure that environmental, economic and social ambitions of the Plan are well defined.
- 4.1.4 The paper looks at the geographic scope of the Action Plan area and the potential timescales for which the Plan will endure for. Importantly, the paper looks at the starting point for measuring the quantum of development, particularly for housing, which could be achieved within the 'Broad Location for Growth' and the factors which will ultimately guide a final housing number, specifically the role of development density.
- 4.1.5 The paper provides general approaches to a range of uses which are likely to be investigated within the Action Plan, for instance looking at matters relating to housing (type, quality and tenure), employment, infrastructure, energy generation and service provision although some of these issues are also discussed in greater detail within other topic papers.
- 4.1.6 With regard to the allocation of land, the paper summarises the role of the site assessment process which will seek to assess land in the 'Broad Location for Growth' for its development potential (the process for Green & Blue Infrastructure opportunities is covered via Topic Paper 4). Methodologies for this process have already been subject to public consultation over the course of Summer 2022 but, for clarity, have been re-summarised within the paper to highlight the robust methods which will be taken to assess the suitability of land for development and future allocation within the Action Plan.
- 4.1.7 The paper also looks at how a new garden village will be defined within the 'Broad Location for Growth', specifically in relation to land use patterns. In this regard, the paper discusses the role of Areas of Separation which will allow distinct spaces between the proposed garden village and existing settlement areas which surround them.
- 4.1.8 The paper acknowledges that the Action Plan process will be considering opportunities for development which fall between new Areas of Separation and the existing settlement boundaries which, if allocated, would be considered as extensions to the existing urban area.
- 4.1.9 Finally, the paper looks at the important issue of how development will be phased through the life-time of the plan and how the expectations of the Action Plan will be implemented through the role of an Implementation Plan. Whilst work on both these issues are still evolving, the paper outlines the importance of both being addressed as the Action Plan progresses.

4.2 Summary of the Issues Raised

- 4.2.1 In total, the number of responses received to questions posed in the topic paper reached 184 from 23 different responders. Full summaries for each response made can be read in Appendix A of this Report, the full responses (with personal details redacted) will be made available on the Council's website.
- 4.2.2 The table below sets out the key issues which have arisen from responders on a question-by-question basis.

<p>Question T1.1: Do you feel that the evidence base identified in Table 4.1 represents a reasonable and proportional basis to prepare the Lancaster South Area Action Plan? If not, what gaps in evidence do you think are missing?</p> <ul style="list-style-type: none"> • In general terms, the evidence base which has been presented is broadly sufficient in preparing the Area Action Plan. However, it is not clear how this evidence base has been formed and has not been informed by the views of the local community. • Consideration should be given to whether further work would be beneficial, particularly in relation to infrastructure delivery, travel and transport, agricultural land quality, site assessment and ecology. • Concern that a number of pieces of evidence remain ongoing and these should be completed before any draft Area Action Plan is completed. • Concern that too much emphasis is given to the role, status and content of the JTP Masterplan. It is noted that the masterplan lacks any evidential basis and does not reflect the geographical scope of Area Action Plan, only concentrating on the delivery of a garden village.
<p>Question T1.2: Do you agree with the proposed vision for the Area Action Plan? Are there any issues or opportunities which you feel have been missed from the vision?</p> <ul style="list-style-type: none"> • In general terms, there was broad support for the vision presented in the Topic Paper subject to the following considerations... • The vision needs to be reflective of the wider geographic scope of the Action Plan area. • It should better reflect the aims and ambitions of Lancaster University. • It should reflect in more detail the requirements for infrastructure delivery across South Lancaster. • Reference should be made to digital connectivity. • Clarity should be provided on the types of employment which will be promoted in the area. • The vision should be based around the promotion of low carbon activity.
<p>Question T1.3: Do you agree that the objectives set out in this Paper accurately reflect the Key Growth Principles set out Policy SG1 of the Strategic Policies & Land Allocations DPD and the vision? If not, what areas have not been covered, providing suggest of how they might be considered.</p> <ul style="list-style-type: none"> • In general terms, there was broad support for the objectives presented in the Topic Paper subject to the following considerations... • It is important that any applications coming forward are treated in a fair and equal manner, particularly in terms of financial contributions towards strategic infrastructure. • Objectives should seek to protect the campus setting of the University and a greater emphasis placed on the role of the University in the local economy. • Objectives should seek to support the full range of employment opportunities and digital connectivity. • Burrow Beck should be referred to as a 'valley' not a corridor. Bailrigg Village should also be referred, particularly in regard to existing settlements in the area. • The wording of objectives should be strengthened to be more robust. • Objectives should make clear it is the responsibility of commercial developers to make sure that infrastructure is in place prior to the occupation of buildings.
<p>Question T1.4: Do you agree with the proposed starting point in terms of Geographical Scope for the Lancaster South Area Action Plan? If not please explain your preferred approach and the rationale for your choice.</p> <ul style="list-style-type: none"> • In general terms, there was broad support for the geographic scope of the Action Plan reflecting that identified in Policy SG1 of the Strategic Policies & Land Allocations DPD (i.e. the 'Broad Location for Growth'). • Should any further land be identified beyond the 'Broad Location for Growth' it must contribute towards the delivery of strategic infrastructure. • Concern that too much emphasis is given to the role, status and content of the JTP Masterplan. It is noted that the masterplan lacks any evidential basis and does not reflect the geographical scope of Area Action Plan, only concentrating on the delivery of a garden village.

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<ul style="list-style-type: none"> Focus should be on the delivery of a garden village within the 'Broad Location for Growth' rather than wider development within this area.
Question T1.5: Do you agree with the proposed starting point in terms of the timescales for the Lancaster South Area Action Plan? If not, please explain your preferred approach and the rationale for your choice.
<ul style="list-style-type: none"> In general terms, there was broad support for the timescales for the Area Action Plan to reflect national planning policy (i.e. reflecting a 15 to 20 year timeframe). The Action Plan should consider including a review mechanism which would allow the content and direction of the plan being reviewed should there be a material change in circumstances. Consideration should be given to restarting the entire Action Plan process to put the local community at the heart of the process.
Question T1.6: Do you agree with the proposed starting point in terms of achieving the quantum of development proposed within the 'Broad Location for Growth' as per the expectations of Policy SG1 of the Strategic Policies & Land Allocations DPD? If not, please explain your preferred approach and the rationale for your choice.
<ul style="list-style-type: none"> In general terms, there was broad support of using the 3,500 new houses, as set out in Policy SG1 of the Strategic Policies & Land Allocations DPD, as the starting point for the quantum of development with the following concerns... Housing numbers need to be critically evaluating in the context of the delivery of strategic infrastructure. Any housing requirement should be evidentially led and reflect that the direction of Policy SG1 which sets out 'at least 3,500 new houses'. Clarity is needed on the overall housing numbers and the differences between the planning position of 3,500 new houses and that identified in the Collaboration Agreement with Lancashire County Council which refers to 9,000 new houses. The quantum of houses should reflect the local circumstances of the area, it should not be reflective of nationally prescribed housing targets and therefore the quantum of development should be more in the region of 2,500 new houses.
Question T1.7: Do you agree with the proposed starting point in terms of the provision of a diverse mix of development densities within the 'Broad Location for Growth'. (NOTE: T1.8 posed the same question).
<ul style="list-style-type: none"> The general approach of providing a broad range of housing densities is supported, subject to the following considerations... Further evidence is required to fully understand the types of housing required, this includes a refreshed 'Strategic Housing Market Assessment' (SHMA). It is important that consideration is given to who will be living in the houses provided. The JTP Masterplan should not be used as a basis for exploring this matter as it is not evidentially base. The role of densities should be discussed with the appropriate stakeholders, particularly in the context of infrastructure delivery. Consideration should be given to the role of student accommodation in the area. Consideration should be given to housing for the elderly . Consideration should be given to the delivery of community-led housing and self-build opportunities.
Question T1.9: Do you consider that the Area Action Plan should seek to allocate land for employment purposes in South Lancaster? What types of employment should be promoted in this location and why?
<ul style="list-style-type: none"> There is broad support for the importance of the Area Action Plan to identify Employment land as part of creating a sustainable community, subject to the following considerations... The requirements for employment should be applied in an adaptable and flexible manner to react to changes in the economy during the plan-period. New residents must have access to the employment opportunities provided in South Lancaster to avoid the area becoming a commuter suburb. Linkages between new employment and the University should be explored. Implications on the Strategic Road Network should be well explored when employment uses are being explored. A full range of employment opportunities should be explored, including large format B2 and B8 uses. Employment development needs to contribute towards the delivery of strategic infrastructure.
Question T1.10: What do you consider the key elements of a local centre to consist of? Do you agree that it should be located centrally within the new Garden Village?
<ul style="list-style-type: none"> There is broad support for the delivery of a new local centre as part of development across South Lancaster, subject to the following considerations... Any commercial development needs to contribute towards the delivery of strategic infrastructure. Whilst it is important to have a local centre within the heart of a garden village, it may be beneficial to have a smaller centre created elsewhere in the 'Broad Location for Growth'. Further masterplanning is required to understand the specific location of a local centre. Consideration should be given to the following uses as part of a local centre – leisure, a foodstore, community facilities, employment, healthcare, education, small-scale retail and cafes.

<ul style="list-style-type: none"> The local centre needs to be well connected to development which surrounds it, particularly in relation to sustainable travel links.
Question T1.11: Do you agree with the proposed starting point in terms of the identification of Areas of Separation? If not, please explain your preferred approach and rationale for your choice.
<ul style="list-style-type: none"> The local community consider the role and scope of an Area of Separation to be critical component of the Action Plan process, providing the necessary separation to keep new and existing settlements distinct in character and separate. The Areas of Separation should be clearly defined in the Action Plan and based on evidence. The JTP masterplan is not considered a sound starting point for understanding the scale, location or scope of the Areas of Separation as it is not evidentially based. Areas of separation should be considered against the expectations of housing delivery. The development industry consider that flexibility should be applied to the designation of green buffers and these should be kept to a minimum to make the most effective and efficient use of land.
Question T1.12: Do you agree that the Area Action Plan should consider development opportunities for urban extensions beyond development of a garden village. Please explain your rationale for your opinion.
<ul style="list-style-type: none"> Support from the development industry and some other stakeholders that the Action Plan should consider the role of urban extension development, considering it will play an important role in terms of delivering the housing numbers necessary and making contributions towards the delivery of strategic infrastructure. The local community consider that the focus of any development in this area should be around the delivery of a garden village. Any development which comes forward outside of that should adhere to the same standards and principles as garden village development. Consideration of urban extensions should be made for around South Lancaster and Galgate. The local community consider that development should not come forward in a piecemeal fashion and not before the production of the Area Action Plan.
Question T1.13: Do you agree that a Phasing Plan is a critical component of the future Area Action Plan, have you any views on how phasing should be dealt with in South Lancaster in terms of the approaches taken?
<ul style="list-style-type: none"> All parties agree that the phasing of development is seen as a critical component of the Area Action Plan. The role of phasing needs to be discussed with all parties, particularly the development industry and key infrastructure providers to ensure development comes forward in a co-ordinated manner. Financial burdens and development viability must be considered when considering the phasing of development. The phasing of different types of development, particularly housing employment and community facilities must be carefully considered.
Question T1.14: Are there any other points you wish to raise which have not been captured in responses to other questions in this Topic Paper?
<ul style="list-style-type: none"> It isn't clear whether the Action Plan will include allocations for sporting facilities. Terminology used to describe the area needs to be consistent throughout planning documentation. The whole plan should be restarted from scratch and be more community-led. The Action Plan needs to consider the most up-to-date evidence and mapping. The Action Plan needs to consider the implications of recreational disturbance on environmentally sensitive sites, for instance Morecambe Bay.

Table A: Table to summarise responses to Topic Paper 1: Establishing a Development Strategy for South Lancaster

4.3 Key Actions Arising

4.3.1 The issues which have been raised, and are briefly summarised in Table A provide for a thorough and wide ranging response to the questions posed. Moving forward the Council will seek to engage with responders further to explore the issues and concerns raised as progress on the draft Action Plan advanced. However, it is noted that the key actions below are issues which need further exploration.

4.3.2 Careful consideration is needed to the **role and purpose of the JTP Masterplan for Bailrigg Garden Village**. There is little doubt that the completed masterplan sets out a series of illustrative approaches and concepts which are worthy of further investigation through the preparation of the Area Action Plan, it also identifies development patterns and urban forms which reflect some of

these approaches and concepts. Consultation on the topic papers highlights that from a local community perspective it is expected that these issues should be explored further and not simply dis-guarded. However, response from the development industry highlights the concerns over the lack of evidential basis for some of these approaches and reflects the reality that the masterplan does not seek to address the full geographical scope of the 'Broad Location for Growth', as identified by Policy SG1 of the adopted Local Plan.

4.3.3 It is therefore important that in evolving the Area Action Plan that consideration is given to the concepts and ambitions of the Area Action Plan and that key principles of the masterplan are tested against actual evidence to demonstrate whether they are achievable or not. Where they are not demonstrated not to be achievable then, to deliver a sound and robust Area Action Plan, new direction must be found. It is also agreed that the Area Action Plan should consider the wider geographical needs for both development and non-development purposes across the entire 'Broad Location for Growth' in the context of the Key Growth Principles set out in Policy SG1 of the Local Plan.

4.3.4 The Council recognise the broad consensus around both the **geographic scope for the Area Action Plan** (i.e. to reflect the 'Broad Location for Growth' as defined by Policy SG1) and the **timescales for the Action Plan** (i.e. reflective of the 15/20 timescales which are set out in National Planning Policy).

4.3.5 Further consideration will be given to the **Vision and Objectives** which have been set out in the Topic Paper, reflecting that whilst there is broad consensus for their content and direction and detailed amendments could be made to clarify the content and direction of the Action Plan.

4.3.6 The City Council, as planning authority, will determine the **quantum of development** to be delivered in the 'Broad Location for Growth' through the Area Action Plan. It notes that there is broad consensus over the starting point for defining the quantum of development, particularly around housing, which is set out in Policy SG1 of the Local Plan. Further work is required to assess the precise locations for development (through the site assessment process) and the mix of development to be delivered. The City Council will continue to work on the remaining elements of evidence to inform this and will work with key stakeholders to ensure that the land identify (and the purposes it has been identified for) are appropriate and deliverable. This will look at opportunities for development and non-development purposes across the entire 'Broad Location for Growth' (not simply a narrow focus on the Garden Village) to ensure there is certainty of the future use of land across the entire designation.

- 4.3.7 The **role of Area of Separations** are critical to the local community and it is important that the Area Action Plan takes a clear and firm position on their role, purpose and scale. The Area Action Plan will seek to make informed and evidentially based decisions on these questions and seek to provide Areas of Separation between existing settlements, as defined in Policy SG1 to be South Lancaster, Galgate and Bailrigg Village. There is broad consensus over the role and need for such designation, however the scale of what is needed is clear a matter of dispute between local communities and the development industry. It will therefore be important that the Area Action Plan strikes the correct balance in identifying such designations.
- 4.3.8 It is agreed that **phasing is an important element of the Area Action Plan** to ensure that there is a steady supply of new housing and employment and the necessary infrastructure is in place at the right time. The Council will be working on both a phasing and implementation plan and liaising with stakeholders over the delivery of such plans to support the implementation of the Area Action Plan.

5.0 Topic Paper 2: Travel, Transport and Securing Modal Shift

5.1 Scope of the Topic Paper

- 5.1.1 Topic Paper 2 relates to travel, transport and securing modal shift, the paper seeks to explore the issues around the connectivity of new development within the South Lancaster area through the creation of new networks and infrastructure connecting to existing travel corridors.
- 5.1.2 The paper is reflective of the fact that Lancaster City Council is not the highways and transport authority for the district, with that responsibility passing to Lancashire County Council. The paper highlights the work which is ongoing in relation to the provision of new road infrastructure as part of the 'South Lancaster Growth Catalyst' which includes the provision of a new road infrastructure in the South of Lancaster, connecting to Junction 33 of the M6 and providing links into the wider local network on the A6 and A588 corridors. This road infrastructure is being advanced by Lancashire County Council through the planning application process.
- 5.1.3 Whilst Lancaster City Council is not the highway and transport authority for the area, the paper reflects on the importance of strong collaboration between the two authorities in relation to all forms of travel, building on the ambitions of the Lancaster District and Transport Masterplan, published by the County Council and the ongoing work in relation to the South Lancaster Growth Catalyst. It will be critical in order to deliver the ambitions of both the planning and highways authority to ensure that transport connectivity and sustainable travel modes support the development proposed in this area.

- 5.1.4 The paper reflects that, in the context of the Area Action Plan, further evidence work is required in relation to both highways and sustainable travel to fully inform the context of a future draft Action Plan, particularly in relation to any further local highway improvements which will be required to address any evidenced impacts on the road network.
- 5.1.5 Beyond matters of highways, the paper seeks to address an equally important issues around the support given to modal shift toward more sustainable forms of travel other than simply private vehicles. The paper provides background context on the matters of modal shift and how it might be achieved in South Lancaster, through opportunities to maximise sustainable modes of travel, such as cycling / walking or public transport and, where possible through the disincentives to using private cars. The paper also looks at the potential for the Action Plan to set a clear target around modal shift to make clear its ambitions in his regard.
- 5.1.6 Finally, the paper discusses the issues around vehicle parking within new development and its implications on wider design matters and the role of modal shift. The paper highlights that there are a number of approaches to this issue, such as the level of parking provided, the type of parking provided and where it is located in new development.

5.2 Summary of the Issues Raised

- 5.2.1 In total, the number of responses received to questions posed in the topic paper reached 126 from 21 different responders. Full summaries for each response made can be read in Appendix A of this Report, the full responses (with personal details redacted) will be made available on the Council's website.
- 5.2.2 The table below sets out the key issues which have arisen from responders on a question-by-question basis.

Question T2.1: Do you feel the evidential basis towards transport and highways described in this section represents a logical approach to the assessment of the implications of proposed development within the 'Broad Location for Growth' and establishing the Council's ambitions around the delivery of modal shift. If not, please explain the rationale to your answer.

- Existing transport evidence is outdated and doesn't take account of post covid travel behaviour. There's a need for a robust evidence base that takes into account the existing highways capacity and future housing growth in South Lancaster.
- The County Council are undertaking similar evidence base work and AAP work should align with this.
- Need for highways assessment evidence and approach to align with sustainable travel measures i.e. the approach to meeting highways capacity and modal shift needs to be one strategy.
- Modal shift is seen as a fundamental part of approach, but work is needed to show its effectiveness and how it will be funded and whether it is viable.
- Concern that South Lancaster is too isolated, and that modal shift will be hard to achieve based on the level of interventions proposed.
- Concern that BGV will increase traffic on local roads to the south. These are currently used as rat runs by cars and HGVs and this will increase.

<p>Question T2.2: Do you feel that the evidence identified in Table 3.1 represents a reasonable and proportional basis for the production of the Lancaster South Area Action Plan? If not, what gaps in evidence do you think are missing?</p> <ul style="list-style-type: none"> • The Transport Strategy needs to be developed in tandem with the landowner collaboration strategy and strategies for funding infrastructure. The cross linkages to the implementation plan need to be made clearer. • Concern that parts of evidence base are ongoing and it is important that it is completed in order to inform the preparation of the AAP. • AAP should be supported by the development of a masterplan that includes a phasing plan and development framework. • The range of evidence base is very broad but it needs to contribute to an overall vision set out in the AAP. • Concern that the evidence base identified does not justify the level of growth • There are gaps in terms of footpath/bridleway network and the development of a rail strategy.
<p>Question T2.3: Do you agree that the logical approach to addressing implications on the highway network provide a clear and logical approach to this critical matter? Do you feel that the City Council should be exploring these issues in an alternative way? If so, please explain your answer.</p> <ul style="list-style-type: none"> • There needs to be reference to the South Lancaster Growth Catalyst. This provides the evolution in the County Council's evidence base since the Lancaster Highways and Transport Masterplan in 2016. • There needs to be a shared understanding between the City and County Council around cumulative transport impacts and the way in which strategic infrastructure is funded and delivered. • Whilst the J33 and Galgate highways improvements will address localised capacity issues, the network issues north towards the city centre are unresolved. • Concern that the highway improvements highlighted do not align with the strategy for modal shift. A proactive approach in terms of designing a low carbon development is proposed, as opposed to a mitigation led approach. • Concerns over the deliverability of the spine road under the railway. • Modal shift could be brought about by a Travel Demand Management approach. • Traffic modelling work should look at the wider implications of the proposed highways works. • There is a reliance on developer contributions to provide transport infrastructure. Requests to developers need to be supported by a robust evidence base which have been viability tested and subject to public consultation. • Consideration should be given to other development areas alongside the new road infrastructure. • Cycling and public transport should be at the forefront of these plans especially to remove local traffic from the city. Cycling infrastructure needs to be significantly improved to ensure cyclist are safe and away from vehicles. Buses need to be more regular and cheaper for those living just outside the City. • Concerns that development will start at the northern end of the growth area and there will be local highways capacity issues eg A588.
<p>Question T2.4: Do you consider that the ambitions of the Bus Service Improvement Plan (BSIP) provide sufficient scope for connectivity between the 'Broad Location for Growth' and Lancaster City Centre? Do you feel that there is a lack of connectivity to any other areas? If so, where?</p> <ul style="list-style-type: none"> • Aims and ambitions of the BSIP are welcomed but concerns over the lack of detail and clarity on what will be provided in South Lancaster. • Meaningful public transport will be required if congestion in the city centre is to be avoided. • Concerns over the lack of ambition in the existing BSIP for South Lancaster. • Concerns over the provision of bus lanes on routes to the south of Lancaster and impacts on rural parishes in terms of rat running and on existing residents travelling to the city centre.
<p>Question T2.5: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.</p> <ul style="list-style-type: none"> • The importance of providing meaningful public transport were highlighted with Approaches B and C being preferred. Approach C included the provision of a new railway station at Bailrigg. • Significant transport infrastructure should be provided to secure increased connectivity between South Lancaster and Lancaster City Centre. Improvements to the existing network should be undertaken alongside new infrastructure for sustainable travel. • There will be a reliance on developer contributions to support public transport. The use of developer contributions and funding more generally should be made clear and should also meet appropriate developer contribution and viability tests. • Careful consideration will be required in terms of routing through the BGV and the University particularly in early phases. • Concerns over the lack of commitment to a Park and Ride scheme. • Needs to be further consideration of car parking strategy.
<p>Question T2.6: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.</p>

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<ul style="list-style-type: none"> • Approach C was the preferred approach amongst respondents. There was some limited support for Approach D and the use of no car development but not seen as realistic by others. The provision of a comprehensive cycling and walking network was seen as an important part of ensuring modal shift. • Concerns over the lack of clarity in terms of the proposed routes and network. The current mapping refers back to the JTP Masterplan which is limited in geographic scope. • The network needs to consider linkages to the city centre and the network as a whole, which is currently fragmented. • Canal towpath improvements could have positive results for existing and new residential areas to support active travel and contribute to a longer-term version to link up with local residential areas through high quality walking and cycling routes. However, the canal towpath should not be seen as a primary commuting cycle route due to lack of segregation with other users and low bridges.
<p>Question T2.7: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.</p>
<ul style="list-style-type: none"> • Approach C was the most popular amongst respondents. Walking is recognised as critical in terms of reducing car journeys. The concept of the 10 min neighbourhood, prioritisation of walking within new development and enhancement of the wider network was supported. • Limited support for Approach D (no car development) and seen as unrealistic by others. • Routes should be segregated from cyclists as far as possible and there should be good separation from motorised traffic. • Links should be provided to the wider countryside. These could provide links between the Lune Estuary and the Forest of Bowland • Integration of the network to Lancaster City Centre and the University Campus are essential. The emerging Sustainable Travel Strategy should take account of the latest walking infrastructure guidance LTN/20 and the updated policy circular 01/2022. • Provision for mobility scooters and wheelchairs should be incorporated into the proposals.
<p>Question T2.8: Do you agree that the Council should the role of bespoke vehicle parking standards for new development which comes forward within the 'Broad Location for Growth'? If not, please explain your rationale for your opinion.</p>
<ul style="list-style-type: none"> • There was generally support for the provision of bespoke parking standards. • There is a recognition that the need for modal shift will require a different approach to parking. This could be in terms of the number of spaces provided but others saw it in terms of design only. For example through the sue of streets with priority given to walking and cycling. • Concerns over the level of existing traffic and limited support for 'no car' development.
<p>Question T2.9: Do you have any preferred approach from those described. Please give rationale for your answer. Do you have any views on potential approaches towards vehicle parking described in this paper? Do you feel that any potential approaches to vehicle parking have been missed?</p>
<ul style="list-style-type: none"> • Approach C was seen as the most appropriate by respondents, where parking standards sought to support wider ambitions to bring about modal shift by reducing vehicle parking. • In some locations more restrictive parking may be appropriate but a flexible approach should be taken. Thought needs to be given to visitor parking if it is restricted for residents. • There is an opportunity for low carbon, low demand development where car journeys are kept to a minimum by well designed development at the outset and trips by foot/cycle are encouraged.
<p>Question T2.10: Do you agree with the definition presented on modal shift? How do you think that the definition can be refined further to be pertinent to South Lancaster? Please provide rationale for your answer.</p>
<ul style="list-style-type: none"> • There was general support for the definition of modal shift proposed although there were concerns that it would be difficult to achieve. • Alternative wording was provided which defined modal shift as when the benefits of using private vehicles (comfort, convenience, cost etc) is outweighed by alternative modes. • Clarification should be provided in the wording around the role of electric vehicles. There should be an acceptance for the need for private journeys and that these can be made by electric vehicles rather fossil fuelled cars. • Definition should take account of the DfT Transport Decarbonisation Hierarchy. • Concern that little progress has been made on existing transport issues
<p>Question T2.11: Do you feel that the elements of modal shift described provide the correct spectrum of incentives and disincentives to be explored through the Action Plan process? Do you feel there are any further elements which should be explored? Do you feel that any elements should be discounted from the process? Please explain your answer.</p>
<ul style="list-style-type: none"> • General support for the range of measures but concern that some may be unviable and need further investigation through the AAP process. This should include evidence of funding and delivery mechanisms. • There should be more emphasis on Park and Ride and the potential role of a new railway station

<ul style="list-style-type: none"> Further work should be done to consider the propensity for cycling and walking – this will help inform proposed measures and modal shift changes
Question T2.12: Do you agree the Council should investigate the opportunities for modal shift in preparing the Area Action Plan? If not, please explain the rationale to your opinion.
<ul style="list-style-type: none"> General support for the approach to investigate modal shift as part of the AAP. This should be backed up by evidence and should be viability tested where there is a reliance on developer contributions. The approach should also factor in well-designed development that minimises journeys at the outset. Modal shift targets can be applied potentially through the use of Travel Plans.
Question T2.13: Do you agree that this provides the appropriate starting point in investigating issues of modal shift? If not, which approach do you think would be preferable? Do the approaches presented represent all available approaches to the Council in relation to this matter?
<ul style="list-style-type: none"> General support for Approach C which is to consider ambitious levels of modal shift through the development of a Sustainable Travel Strategy for the AAP. The approach needs to consider the wider area and not just the area for growth in South Lancaster, this may include consideration of Travel Demand Management and Traffic Management.
Question T2.14: Are there any other points you wish to raise which have not been captured in responses to other questions in this Topic Paper?
<ul style="list-style-type: none"> Concern that the funding and delivery of strategic transport infrastructure has not been addressed and more reference is needed to the South Lancaster Growth Catalyst. There should be further consideration of the location of a future railway station. Consideration should be given to all parts of society regardless of age. Speed limits within both new development and existing roads to improve safety. consider building in resilience to the local road network in case the underpass of the railway line floods. consider community taxis for citizens with mobility issues who do not wish to drive.

Table B: Table to summarise responses to Topic Paper 2: Transport and Travel and Securing Modal Shift

5.3 Key Actions Arising

- 5.3.1 The issues which have been raised, and are briefly summarised in Table B provide for a thorough and wide ranging response to the questions posed in relation to the Transport Topic Paper. Moving forward the Council will seek to engage with responders further to explore the issues and concerns raised as progress on the draft Action Plan advanced. However, it is noted that the key actions below are issues which need further exploration.
- 5.3.2 The **funding of key transport infrastructure**, including the sustainable travel measures as well as highways improvements, was an issue for many responders. It will be important for the City Council to work closely with the County Council to identify a range of measures and interventions, identify relevant costs and develop funding and delivery mechanisms, for instance via a Infrastructure Delivery Schedule.
- 5.3.3 Many of the responders **recognised the need for sustainable travel measures** given the existing transport issues in the locality and welcomed the opportunities to promote sustainable travel through improved cycling, walking and public transport links – not just within the Action Plan area itself but also into the wider locality. However, there was an expectation that however much this was promoted it would not appeal to all due to their own personal circumstances and the distances between South Lancaster and the city centre. The ongoing **Sustainable Travel Strategy** which is looking at the role sustainable travel can have in South Lancaster will need to therefore to be realistic.

- 5.3.4 **The Action Plan needs to address its transport evidence** was an issue raised by many. Whilst it was recognised that work had begun on sustainable travel matters it was also recognised that this work was still ongoing. The preparation of a **Highways Assessment** to support the growth to be proposed in the Action Plan is a key part of the Council's evidence and yet to be commenced.
- 5.3.5 Many local residents or community groups remained sceptical that the highway improvements proposed so far would address increased levels of traffic on local roads. Specific reference was made to the challenges along the A6 and A588 corridors in relation to current capacity and the issues of further traffic on Pointer Roundabout. This is an area that the **Highways Assessment** will need to consider.
- 5.3.6 The Council will **work collaboratively** with the County Council, as Highways Authority, in carrying out this work. It will also be important for this assessment and the work on sustainable travel to align to ensure there is a comprehensive approach to the provision of transport infrastructure in South Lancaster and the wider area.
- 5.3.7 Many respondents saw the **value in promoting modal shift through the Action Plan** and supported an approach which pursued ambitious levels which could bring about real changes in travel behaviour. However, such a concept needs to be well defined in the Action Plan for it to be meaningful, this include setting a definition and including a realistic target. This will be investigated further through the development of the Sustainable Travel Strategy and Highways Assessment.
- 5.3.8 There was support for the development of **bespoke parking standards** that could limit car parking in order to support modal shift. However, there was little support for Car Free Development as most recognised that it was unrealistic to think there would be significant demand for such housing in an out-of-centre location. It was reflected that many of the community would rely on a private vehicle for some uses and whilst car sharing and communal parking facilities could be explored it was felt that demand car free development would be limited. AAP specific parking standards will therefore be explored.
- 5.3.9 **Development Viability** was a key issue for the development industry throughout their responses to the topic papers, however sound evidence, including robust highways and viability assessments, were seen as a critical viability issue for them. It will be important that the Action Plan clearly sets out the necessary, critical infrastructure which is required to facilitate growth and that this is supported by a robust viability assessment to demonstrate that with such asks sustainable development still can be achieved.

6.0 Topic Paper 3: Addressing the Climate Emergency & Community Resilience

6.1 Scope of the Topic Paper

- 6.1.1 Topic Paper 3 relates to issues surrounding addressing the climate emergency and community resilience. The topic paper relates to how buildings are built and the way that they are powered and explores how urban food growing and agriculture can be included in development in South Lancaster and how the community can be supported as it grows through community wealth building and local governance.
- 6.1.2 Topic Paper 3 has three primary chapters, broken down into subtopics. Each of the subtopics presents a range of approaches that could be explored through policy. The potential approaches were followed by questions about the approaches suggested and the opportunity was provided for respondents to provide different approaches for anything that had not been discussed. The first chapter looked at Zero Carbon Development Built for Climate Resilience, the second chapter looked at Net Zero Energy Generation and Distribution and the third and final chapter related to Community Resilience and discussed some of the approaches to developing climate resilient communities in the broad location of growth.

6.2 Summary of Issues Raised

- 6.2.1. In total, the number of responses received to questions posed in the topic paper reached 115 from 11 different responders. Full summaries for each response made can be read in Appendix A of this Report, the full responses (with personal details redacted) will be made available on the Council's website.

Question T3.1: Do you consider that the evidence base identified in Table 4.2.1 represents a reasonable and proportional basis for the production of the Lancaster South Area Action Plan? If not, what gaps in evidence do you think are missing?

- In general terms, respondents raised that the evidence base which has been presented is broadly sufficient in preparing the Area Action Plan.
- Consideration should be given to whether further work would be beneficial, particularly in relation to infrastructure delivery, renewable energy, jobs and economic development, education, health care, viability, agricultural land quality, site assessment and phasing, ecology and considering historical biodiversity records in addition to the current state.
- Concern that a number of pieces of evidence remain ongoing and these should be completed before any draft Area Action Plan is completed.
- Concern that too much emphasis is given to the role, status and content of the JTP Masterplan. It is noted that the masterplan lacks any evidential basis and does not reflect the geographical scope of Area Action Plan, only concentrating on the delivery of a garden village.

Question T3.2: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.

- This question related to approaches to setting of energy efficiency targets and renewable energy delivery within the broad location of growth. Most respondents were supportive of setting energy efficiency standards higher

<p>than the building regulations. Only one respondent was not supportive of setting energy efficiency standards higher than the building regulations.</p> <ul style="list-style-type: none"> • Viability and a request for flexibility was raised as a consideration to for developers and house builders to consider. • Support was raised for setting specific energy use targets. • There was support for including renewable energy supply and storage into builds and that this should be a core feature of new development. • There was recognition of the climate crisis and the need to reduce energy consumption and provide clean energy.
<p>Question T3.3: Do you agree that specific energy targets and energy adaptation measures should be set? If not, what other mechanisms do you suggest to ensure that developments are decarbonised and reach net zero in line with the 6th Carbon Budget, Lancaster's Climate Emergency Declaration, and the Paris Agreement as well as reduce energy costs for residents?</p>
<ul style="list-style-type: none"> • This question related to the setting of specific energy efficiency targets and renewable energy targets within the broad location of growth. All respondents supported the inclusion of renewable energy. Most respondents were supportive of setting specific energy use and generation targets higher than the building regulations. One respondent was not supportive of setting specific targets. • Viability, feasibility, and a request for flexibility was raised as a consideration for developers and housebuilders. • The concept of specific targets to eliminate ambiguity of what is meant by net zero were supported. • It was raised that negative energy targets should be considered to contribute to offsetting existing housing.
<p>Question T3.4: If you feel that specific targets should be set, do you consider that the suggested energy targets and adaptation mechanisms listed above are sufficient? Are there other energy targets that should also be explored?</p>
<ul style="list-style-type: none"> • This question asked if options were sufficient or if other targets should be explored. • Viability and alignment with the building regulations was raised as issues to consider. • Carbon neutrality with renewable generation on site was seen as important. • It was raised that carbon negative targets should be considered.
<p>Question T3.5: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.</p>
<ul style="list-style-type: none"> • This question related to the setting of design coding to support climate mitigation, adaption and resilience. The responses to this question were split. • On the whole house builders did not show support for design coding for the climate emergency as a requirement but suggested it could be used to support best practice and developments seeking to use new methods or technology. • If design codes were to be included, it was raised that considerations should be given to flexibility and relaxing policy requirements for viability. • All other respondents supported setting design coding for the climate emergency. • The ambition and commitment of setting long term climate focused design was supported. • The approach was seen as a way to deliver high quality sites for people and increase biodiversity • Design coding seen as a way to support climate adaptation and particularly flooding. • It was raised that the design coding should apply to all of the area of growth and not only the garden village.
<p>Question T3.6: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.</p>
<ul style="list-style-type: none"> • This question related to approaches to carbon offsetting in principle. As a general principle carbon offsetting was supported. • Viability was raised as a consideration. • It was raised that offsetting in new development should only be used as a last resort for residual emissions and preferably there should be no need for it with new development. • There was support for offsetting within the broad location for growth and linked to the development • There was some support for contributing to an offsetting fund. • More details were requested.
<p>Question T3.7: Do you feel that contributions to a local carbon offset fund represent a reasonable way to account for residual emissions from development? If not, how do you suggest residual carbon emissions be accounted for and offset over the development lifetime?</p>
<ul style="list-style-type: none"> • This question related to approaches to contributions to a local carbon offsetting fund. • There was support from respondents of the use of an offset fund with a reasoned tariff. • A suggestion was made that residents secure 100% renewable energy tariffs instead. • Suggestions were raised for supporting peatland restoration. • It was raised that offsetting could be used as an excuse of continuing business as usual should not be pursued.

<p>Question T3.8: Do you have any preferred approach from the those described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.</p> <ul style="list-style-type: none"> • This question related to approaches to addressing embodied carbon in new development in the broad location of growth. • Concerns were raised around the weight given to the JTP masterplan and any strategy should be for the whole area and not just the garden village. • The development industry raised concerns around viability of embodied carbon targets. • There were also suggestions that embodied carbon should be encouraged but not required. • If brought in, there were suggestions that it needs a way to monitor it and implications for assessment preparation should be considered including interactions with other policies. • Respondents outside of the development industry were supportive of design codes which support embodied carbon targets. • It was suggested that the Building with Nature Standards Framework 2.0 be included as part of considerations. • A suggestion was made that even if the council does not pursue embodied carbon targets, the council should support proposals which seek to meet embodied carbon targets even when the proposal does not meet other AAP objectives. • Embodied carbon was raised as important for a development to be truly carbon neutral. • A Parish Council raised the importance of design coding.
<p>Question T3.9: Do you feel that the above approach to supporting the reduction in embodied carbon is the best one? If not, please provide a rational for your answer. How do you suggest reductions in embodied carbon should be supported?</p> <ul style="list-style-type: none"> • This question related to asking for additional approaches to addressing embodied carbon in new development in the broad location of growth. • There were no additional methods suggested for addressing embodied emissions.
<p>Question T3.10: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.</p> <ul style="list-style-type: none"> • This question related to options around construction and design of non-residential development. • There was a preference from one respondent to avoid BREEAM and focus on low or zero carbon construction. • There was broad support for requiring net zero for buildings. • Overall, the responses focused on commercial development being built to ambitious standards. • A respondent also highlighted that if BREEAM is chosen but if developments deliver to the same aspirations they should be supported.
<p>Question T3.11: Do you agree that non-residential development should go beyond BREEAM Excellent within the AAP area? If so, are there other standards or targets which should be considered? If not, what is your rational? Do you have other suggestions of how to bring commercial development in line with net zero?</p> <ul style="list-style-type: none"> • This question related to options around construction and design of non-residential development and setting a standard beyond BREEAM excellent. • There was wide support for going beyond BREEAM excellent. • The Building with Natures Standards Framework was a suggested alternative standard/target to consider.
<p>Question T3.12: Do you have any preferred approach to water efficiency from those described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.</p> <ul style="list-style-type: none"> • This question related to options around setting water efficiency standards. • There was no objection or support from all respondents that water higher efficiency standards and water resilience be expected than is set out in the local plan. • Notwithstanding that higher standards were not objected to, there were concerns raised that there should be recognition on the impact of viability from the development industry. • There was a suggestion that the whole catchment approach should be done.
<p>Question T3.13: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.</p> <ul style="list-style-type: none"> • This question related to options around setting expectations for sustainable construction. • The development industry raised viability as a concern and suggested consistency with the Local Plan. • Respondents from outside of the development industry were supportive of pursuing higher sustainability in construction practices.
<p>Question T3.14: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.</p>

<ul style="list-style-type: none"> • This question related to options around fossil fuels and their use for providing stationary energy. • The development industry suggested that the AAP should align with national policy. • Viability was raised as a concern related to delivering a renewable energy strategy. • Outside of the development industry support was for the area action plan area to be fossil fuel free from day one.
<p>Question T3.15: Do you agree that new development in the AAP area should be fossil fuel stationary energy free from day one? If not, please explain your rationale? What alternative date do you suggest and what suggestions do you have for decarbonising any new stationary energy in development in the AAP area?</p>
<ul style="list-style-type: none"> • This question related to alternatives to the options presented to fossil fuel free development. • It was raised that developments could connect to a district heating system. • Development should be fossil fuel free from day one. • That it is uneconomic to continue to install gas infrastructure.
<p>Question T3.16: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.</p>
<ul style="list-style-type: none"> • This question related to delivery of a local area energy plan. • There was broad support for local area energy planning. • Clarity was requested around detail, economic achievability, implications to developers, feasibility and viability. • Support was given to ensure that there is enough capacity for future development. • Support was raised to plan for maximising renewable energy opportunities. • It was suggested that growth should be limited by energy demand. • One respondent suggested that net zero policies should be set and infrastructure planning be done by the operators.
<p>Question T3.17: Do you agree that Local Area Energy Planning represent a logical starting point for understanding how energy will be generated and distributed across the wider 'Broad Location for Growth' and used a way to identify where the grid needs improvements in order to bring forward the ambitions of net zero development? If not, what would you consider the logical starting point to be?</p>
<ul style="list-style-type: none"> • This question related to alternatives to the using local area energy planning as a start. • It was broadly agreed that local area energy planning is a preferred approach. • This was particularly to identify constraints and opportunities for sustainable energy. • One respondent suggested that providing net zero policies are in place, then only a heat network should be planned for.
<p>Question T3.18: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.</p>
<ul style="list-style-type: none"> • This question related to options around heat network delivery. • There was support for understanding heat network feasibility across the site. • More detail was requested, and viability was raised as a concern.
<p>Question T3.19: Do you agree with the above represent a logical starting point for understanding heat network inclusion and delivery in the wider 'Broad Location for Growth'? If not, what would you consider the logical starting point to be?</p>
<ul style="list-style-type: none"> • This question related to alternatives to the options and alternatives around heat network delivery. • It was agreed that the HNDU technoeconomic study is the logical starting point. • It was raised that while pursuing a HNDU technoeconomic study is logical starting point, clarity around the proposal was requested.
<p>Question T3.20: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.</p>
<ul style="list-style-type: none"> • This question related to options around supporting community energy. • There was broad support for supporting community led energy. • Concerns were raised around viability and deliverability. • Suggestion was made that solar should be delivered on built environment and not green spaces. • Suggestions were made that land allocations and potential community energy funds are explored.
<p>Question T3.21: Do you consider opportunities for local food production to be an important component of development within the Broad Location for Growth? What methods of food production should be considered when balanced against development in this location? Please provide rationale to your response.</p>
<ul style="list-style-type: none"> • This question related to including opportunities for food growing the broad location for growth. • There was consensus from respondents that food growing should be supported. • There was a suggestion that land value equalisation be used to incentivise this use. • Suggestions were made for having land with multifunctional use.

<ul style="list-style-type: none"> • It was suggested that land should be used for authentic food production and not just excessive parkland. • There was support for supporting diverse land use such as layering crops, fruit trees and bees. • There was concern raised around the management that type of development to facilitate community uses • There was support for having traditional farms and small holdings including in areas of separation. • There was support for a consideration for livestock farming.
<p>Question T3.22: Do you have any preferred approach from those described? Please give rationale for your answer? Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be?</p>
<ul style="list-style-type: none"> • This question related to options around different types of food growing opportunities. • There was support for different scales of farming. • It was highlighted that the area is a rural area, and it was felt to be important to include food production. • It was raised that there would be difficulties with specifying to occupants how, and for what purposes, their land would have to be used.
<p>Question T3.23: Do agree that community wealth building is an important component of any growth in South Lancaster and development within the 'Broad Location for Growth'? If not, please explain your rationale. What do you consider to be the key components of community wealth building which could be applicable to the emerging Action Plan?</p>
<ul style="list-style-type: none"> • This question related to options to community wealth building. • There was broad support from respondents to ensuring local employment. • It was highlighted that the concept of community wealth was very important. • It was raised that diverse employment opportunities should be provided. • There was issue raised around limiting number, density, and bedrooms to ensure the area stays a village and does not become a new town. • It was raised that there should be employment opportunities to help reduce travel and carbon emissions.
<p>Question T3.24: Are there are any other points you wish to raise which have not been captured in responses to other questions in this Topic Paper?</p>
<ul style="list-style-type: none"> • This question related to creating space to raise other points not captured elsewhere. • It was suggested the area action plan be used to set limits to growth. • Suggestion was made to retain as much green space as possible. • It was raised that brownfield sites should be utilised. • It was suggested that the net zero plans for the AAP and University should complement each other and find synergies. • It was raised that tree planning for addressing climate change was not included.

Table C: Table to summarise responses to Topic Paper 3: Addressing the Climate Emergency and Community Resilience

6.2 Key Actions Arising

6.2.1 The issues raised around Topic Paper 3 are briefly summarised in Table C. They provide a ranging response to the questions posed. The Council will seek to engage with respondents further to explore the issues and concerns raised as progress on the draft Action Plan is advanced. However, the key areas below are issues highlighted at this stage which need further exploration.

6.2.2 Various **additional evidence documents** have been mentioned. Work is also being carried out in relation to soils, agricultural land quality, and renewable energy. Other matters raised will be considered. Evidence will be published once it is available.

6.2.3 Careful consideration is needed to the **role and purpose of the JTP Masterplan for Bailrigg Garden Village**. The completed masterplan sets out a series of illustrative approaches and concepts which are worthy of further investigation through the preparation of the Area Action Plan. The masterplan further identifies development patterns and urban forms which reflect some of these approaches

and concepts. Consultation on the topic papers highlights that these issues should be explored further and not simply dis-guarded. However, response from the development industry highlights the concerns over the lack of evidential basis for some of these approaches and reflects the reality that the masterplan does not seek to address the full geographical scope of the 'Broad Location for Growth', as identified by Policy SG1 of the adopted Local Plan.

- 6.2.4 The consultation highlighted that there is clear recognition of the climate crisis and overall general support for ensuring that climate change mitigation and adaption measures are incorporated into the principle of the Action Plan. In particular, there was a **strong level of wider support for the use of design coding**, there were differences between wider organisations and the community seeing design coding as a requirement and house builders who instead suggested it could be used to support best practice and developments that are seeking to use new methods or technology. This also applied to **embodied carbon targets** and using design coding to support reducing embodied carbon. It is recognised that engagement with a range of stakeholders will be key to ensuring design achieves the aims of national and local policy and guidance for garden villages and for the Broad Location for Growth to help ensure all housing developments demonstrating best practise and using methods and technologies that assist with tackling the climate crisis.
- 6.2.5 In terms of setting **specific energy use and generation targets higher than building regulations**, all, bar one respondent, were supportive of this approach and the concept of specific target to eliminate any uncertainty or ambiguity regarding what is meant by net zero was supported. Also highlighted was an approach that negative energy targets should be considered to contribute to offsetting existing housing. For commercial development there was support for being more ambitious than **BREEAM** particularly around net zero. There was some resistance from the development and housing industry to developing **fossil fuel free** stationary energy from day one though no other alternative for decarbonising was offered. Responses from other sectors and the community however supported developing without fossil fuels. There was also broad support for **local area energy planning and exploring the feasibility of heat networks**. Support was raised to explore how community energy can be delivered within SG1. Viability, feasibility, deliverability, and a request for flexibility was widely raised as a consideration for developers and housebuilders. Issues raised are currently being explored through a HNDU funded technoeconomic study. The City Council will be pursuing a local area energy plan in the near future and will be targeted at including those topics raised in the topic paper and responses. There was concern that many of the measures being proposed would have impacts on the viability of development. The Council agree that this will be a key piece of the evidence base in moving forward.

- 6.2.6 There was support for increasing **water resilience and water efficiency** standards. There was also a suggestion raised that a whole catchment approach should be explored. How water resilience can be improved will be explored stakeholders as part of wider blue infrastructure considerations.
- 6.2.7 In terms of the potential to require contribution to a **local carbon off-setting fund**, there was support for this with a reasoned tariff, although a suggestion was made by developers that residents secure 100% renewable energy tariffs instead. Support for peatland restoration was also raised as an issue to consider. There was concern that offsetting would be used as a get out of meaningful net zero. It was also raised the trees and their role in climate change were not included in Topic Paper 3. How carbon sequestration and offsetting should be addressed within SG1 will be explored further.
- 6.2.8 There was broad support for including meaningful **food growing** within the broad location for growth. Respondents widely supported more diverse agriculture, opportunities for small and larger scale agriculture. There was also support raised for having more diverse foodscapes rather than more extensive parkland and also that they could be located in areas of separation. And it was noted that there was not a discussion on livestock farming included in the topic paper. These opportunities will be explored further.
- 6.2.9 Respondents highlighted, on the topic of **community wealth building**, the importance of having diverse local employment. This was not only to provide local jobs but also to help reduce transport associated emissions.

7.0 Topic Paper 4: Securing Green & Blue Infrastructure & Biodiversity Net Gain

7.1 Scope of the Topic Paper

- 7.1.1 Topic Paper 4 looked at how the Action Plan could better protect and enhance green and blue infrastructure across the Broad Location for Growth. The Paper recognised that in moving forward the Action Plan will need to understand and respond to the existing landscape and topography of this area, and that it will need to ensure that land identified for development respects the distinctive landscapes of the area, builds on local character and that linkages to the natural environment are strengthened and new opportunities for enhancement are created. Potential approaches to achieve this were discussed within the Topic Paper.
- 7.1.2 The Topic Paper set out a series of sub-sections which related to the green and blue infrastructure network of South Lancaster and explored how the Council might look to protect and enhance these as the AAP progresses.

- 7.1.3 It looked in detail at landscape considerations, presenting the evidence work that has been prepared to date and exploring how through policies and allocations within the AAP the landscape of South Lancaster can be protected whilst at the same time delivering development which is appropriate to and in keeping with the local landscape. The potential for local landscape designations and areas of separation were also discussed.
- 7.1.4 The concept of a Green Halo is also explored. This follows recommendations in the JTP Masterplan for a Green Halo which connects existing areas of woodland to create a landscape and biodiversity network in which development is set within. How the Council might deliver this is explored within the Topic paper.
- 7.1.5 Potential policy responses in relation to Biodiversity Net Gain were also discussed. Under the Environment Act 2021, all planning permissions granted in England, with a few exceptions, will have to deliver 10% BNG from November 2023. The Topic Paper explored how this could be delivered across the AAP area and also what opportunity exists to implement a higher percentage.

7.2 Summary of Issues Raised

- 7.2.1 In total, the number of responses received to questions posed in the Topic Paper 4 reached 118 from 18 different responders. Full summaries for each response made can be read in Appendix A of this Report, the full responses (with personal details redacted) will be made available on the Council's website.
- 7.2.2 The table below sets out the key issues which have arisen from responders on a question-by-question basis.

<p>Question T4.1: Do you feel that the evidence base in table 4.1 represents a reasonable and proportional basis for the production of the Lancaster South Area Action Plan from a green and blue infrastructure perspective? If not, what gaps in the evidence do you think are missing?</p> <ul style="list-style-type: none"> • The evidence base was generally viewed to be comprehensive and was considered to be a suitable evidence base on which to progress the AAP. • The need to complete the evidence base prior to making further progress on the AAP was noted. • A number of additional evidence base documents were highlighted for consideration. These included commissioning a Heritage Assessment, a Utilities Assessment and a Soil and Agricultural Land Quality Report. The need for further work in relation to the methodology for calculating developer contributions was also raised. • The need to consider historical pastures and meadows was noted with their importance in local heritage and food production highlighted. • Concern was raised that too much emphasis is given to the role, status and content of the JTP Masterplan. It is noted that the masterplan lacks any evidential basis and does not reflect the geographical scope of Area Action Plan, only concentrating on the delivery of a garden village. • The need to consider outdoor sports separately from open space was highlighted with these noted to be two different typologies.
<p>Question T4.2: How can we seek to better incorporate/consider the historic environment within our assessment of GBI potential?</p> <ul style="list-style-type: none"> • The work undertaken to support the Masterplan in relation to heritage assets was highlighted. • Recommended that further work be undertaken into agricultural history/development noting the evidence of agricultural and driving routes back to roman times.

<ul style="list-style-type: none"> • The benefit of commissioning an independent assessment to assess heritage assets was highlighted with this aiding the robustness of the work. Noted that there may be times where proposals for GBI conflict with heritage assets and that in such circumstances an independent assessment might provide a more objective assessment. • Some respondents questioned the need to include heritage within the assessment of GBI potential with sufficient protection for heritage provided elsewhere in the Plan. • Comments noted the difficulty of defining what is of historic significance. Whilst ancient history is noted to be covered in the archaeological assessments there is a need to consider more recent history.
<p>Question T4.3: Do you agree that the 8 Design Principles set out in the JTP Masterplan represent a logical starting point for understanding how landscape-led development could be achieved across the wider 'Broad Location for Growth'? If not, what would you consider the logical starting point to be?</p>
<ul style="list-style-type: none"> • The design principles and the concept of starting with a landscape led approach was generally supported. • The extent to which the principles can be applied to the broader area of growth were questioned with the principles prepared in the Masterplan relating to the Garden Village area only. Noted that, in the interests of soundness, the underlying strategy and design principles prepared for the AAP must relate to the whole AAP area. Note that additional work will be required. Other respondents disagreed and believed that the principles should be applicable to the whole AAP area. • Specific comments were made in relation to a number of principles. This included the need to recognise that there may be exceptions to the principles with the principles representing starting points for consideration rather than a hard fast rule. • Representations noted that the precise route of the Green Halo will require careful consideration. • The need to consider the University in the same way to that of existing settlements was noted in order to ensure that it remains distinguishable and separated from the Garden Village. • Comments noted that the garden village areas is a monoculture. • Comments question the ability to balance a range of ambitions, note the need to prioritise. Believe that the identification of the broad location for growth at the identified location has meant that biodiversity has been identified as the lowest priority. • The identification and promotion of wildlife corridors is supported. The need to avoid segregation of corridors was highlighted. • The need to restore biodiversity on-site was highlighted as was the need to avoid conflict between any high value existing areas and those areas that are to be created.
<p>Question T4.4: Do you think any of the recommendations of the Landscape Sensitivity Assessment should be prioritised? If so which ones? What policy mechanisms do you think the Area Action Plan should include to help deliver some of these recommendations?</p>
<ul style="list-style-type: none"> • Whilst representing a good starting point some representations noted that the AAP will need to strike the right balance between policies and recommendations and that it may not be possible to meet every recommendation. The relevance of recommendations will vary from site to site. • Other representations highlighted the need to ensure all principles were applied and noted that none of them should be diluted. • The importance of recommendations relating to buffers around the University were highlighted by the University. • Note that the study area does not align to the whole SG1 area. The need to the evidence base to align with the entire AAP area was noted. • Recommend that more attention is given to land along the A6 corridor which has been viewed to have a lower sensitivity in comparison with other areas within the study. • The need to respect existing developed areas was supported. • The importance of delivering green infrastructure for the wildlife displaced was highlighted as a priority. Noted that people and dogs should be excluded from some areas to ensure that there are safe and undisturbed habitats. • Wording improvements were highlighted to strengthen protection for the natural environment. This included the replacement of 'minimise' with 'prevent impacts where possible'. • The opportunity to strengthen principle E was highlighted. Noted that the report could set out what green infrastructure could be delivered within the wider parkland setting e.g. native landscaping.
<p>Question T4.5: Do you have a preferred approach to the 'Green Halo' from those described? Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.</p>
<ul style="list-style-type: none"> • The concept of a Green Halo is broadly supported. • Representations question what planning status it will have and how it will be implemented. If it is to be delivered by the development industry it will need to be subject to viability testing. • Concern was expressed that the Halo may prevent integration between development and existing built-up areas where more integration would result in more sustainable land use. • Some believe that a site-by-site approach should be adopted and that a fixed area should not be identified. • Note that the appropriateness of the Green Halo to the whole broad location will need to be assessed.

<ul style="list-style-type: none"> Most respondents believed the Green Halo should be multi-functional. Several respondents believed that the protecting and enhancing biodiversity should be the priority. Natural England highlighted that the Green Halo should be located where the best opportunities exist to protect and enhance the surrounding habitat. The Green Halo should look to connect and retain existing areas of habitats. This includes the canal. There was concern that the Halo might not provide a sufficient buffer between the development and would not represent a sufficient area of land as an area of separation
<p>Question T4.6: Do you agree with the Council's preferred approach to Local Landscapes ? If not, please explain your preferred approach and the rationale for your choice.</p>
<ul style="list-style-type: none"> The development industry highlighted the need to ensure that any requirements identified are not too onerous to stifle development. Bespoke approaches might be preferable. Approach C was viewed to be more preferable. Outside of the development industry approach B was preferred with this providing the opportunity to protect valued local landscapes.
<p>Question T4.7: Do you agree with the Council's preferred approach in relation to the protection of existing habitats? If not, please explain your preferred option and the rationale for your choice.</p>
<ul style="list-style-type: none"> The need to protect existing habitats was supported. The need for evidence to be prepared for the whole SG1 area was noted. Concern continued to be expressed as to the extent to which the work undertaken to support the JTP Masterplan is being applied to the whole SG1 area. There was mixed opinion on whether approach A or B was preferred. The need to link into work being undertaken on the Lancashire Local Nature Recovery Strategy was highlighted.
<p>Question T4.8: Do you have a preferred approach to Biodiversity Net Gain from those described above? Please give a rationale for your answer. Are there any other approaches which should be explored? Please provide further detail on what you believe those approaches to be.</p>
<ul style="list-style-type: none"> Whilst BNG delivery above 10% should be encouraged the development industry in general did not believe that a higher figure should be set. Other respondents supported the potential for a higher figure noting that development in this area should be exemplar with opportunity to deliver increased BNG. It is recognised that the adoption of a higher figure would need to be fully evidenced.
<p>Question T4.9: Do you have any preferred approach to Biodiversity Net Gain Delivery from those described? Please give a rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.</p>
<ul style="list-style-type: none"> The need for flexibility was highlighted. Support between the approaches presented was mixed with many supporting a hybrid approach. Natural England support the identification of specific areas for off-setting with this approach assisting the strategic, evidence-based delivery of BNG. They go on to recommend that there should be flexibility within local policy to favour off-site strategic sites rather than always aiming to deliver on-site BNG as a strategic approach. Approach E was not supported.
<p>Question T4.10: Do you agree with the principles of soil protection set out above? Do you feel that any principles are more important than others? Do you foresee any barriers to implementing these principles through planning policy in the AAP?</p>
<ul style="list-style-type: none"> The principles highlighted were supported and were viewed to be a useful starting point. Noted that the mechanisms for practical delivery will need careful consideration. Would look for soil management to be determined through the AAP, including through design codes. The need to utilise evidence from detailed agricultural land and soil surveys was highlighted. Should also refer to the Construction Code of Practice which has been prepared by DEFRA which provides useful advice. The need to ensure that any soil handling is supervised by an appropriately experienced soil expert was also highlighted. Recommended undertaking this work in drier summer months to avoid damaging the soil. Natural England highlighted some amended wording for the principles. The need to ensure that all allocations and subsequent planning should be informed by a detailed soil and agricultural land survey was highlighted as was the need to prepare a soil management plan to set out soil handling requirements and ensure the sustainable management of soil resources.
<p>Question T4.11: Do you have any preferred approach to implementing a Green & Blue Infrastructure Strategy from those described? Please give a rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.</p>
<ul style="list-style-type: none"> Need to ensure whatever approach is adopted is not overly onerous or restrictive. Viability testing will be required. Need to be clear how expectations will be delivered. The use of a landscape led approach was supported with this being used to identify opportunities for development, incorporating and interweaving a strong multi-functional network of green spaces. Support for the various approaches was mixed. In most instances approach A was not supported.

<ul style="list-style-type: none"> • The need to avoid a piecemeal approach to GBI delivery was noted by many respondents. • The importance of identifying key strategic green and blue corridors was highlighted. • The importance of enhancing existing assets alongside the provision of new GBI infrastructure was also highlighted.
<p>Question T4.12: Are there any other points you wish to raise which have not been capture in responses to other questions in this Topic Paper?</p>
<ul style="list-style-type: none"> • Whilst the RSK work was noted to provide a good understanding of ecological constraints across the area the need for detailed work to support individual proposals was noted. Considered to be crucial that each project carries out their own detailed Net Gain Assessment. • The Canal and River Trust note that increased development could lead to an increase in nutrient levels and potentially higher densities of waterweed. They advise that a sufficient vegetation buffer would help to combat this effect. • The need for growth was questioned. Respondents advised that if growth was to go ahead at this location there would need to be clear limits to physical growth. • Called for greater involvement of the local community. • The need to consider and avoid peat deposits was noted.

Table D: Table to summarise responses to Topic Paper 4: Securing Green & Blue Infrastructure and Biodiversity Net Gain

7.3 Key Actions Arising

- 7.3.1 The consultation was in general supportive of a landscape led approach to development with most respondents noting the importance of green and blue infrastructure considerations in the preparation of the AAP.
- 7.3.2 While generally supportive of the overall approach there was concern expressed regarding the potential over reliance of the Council on the **JTP Masterplan for Bailrigg Garden Village**. Concern was raised that too much emphasis is given to the role, status and content of the JTP Masterplan. Comments noted that the masterplan lacks any evidential basis and does not reflect the geographical scope of Area Action Plan, only concentrating on the delivery of a Garden Village. The appropriateness of extending the concepts beyond the Garden Village to the wider SG1 area were therefore questioned.
- 7.3.3 As highlighted through the analysis of other topic papers the AAP will need to ensure that the concepts, ambitions and key principles of the masterplan are fully tested against actual evidence in order to determine whether they are both appropriate and achievable. This work is currently ongoing. The appropriateness of the principles to the wider AAP area will need to be considered through this work.
- 7.3.4 Another key message emerging through the consultation related to **implementation and deliverability**. Whilst respondents were generally supportive of many of the measures and approaches presented questions were raised regarding who would ultimately be responsible for delivery. This was especially relevant in relation to the aspirations to develop a **Green Halo** which whilst generally supported was questioned in terms of delivery. Identifying delivery mechanisms and delivery partners will be a key task for the Council as it looks to progress the AAP.

- 7.4.4 Following on from this the Council will need also need to ensure that **viability** is fully tested. There was concern that many of the measures being proposed would have impacts on the viability of development. The Council agree that this will be a key piece of the evidence base in moving forward.
- 7.4.5 The need for **flexibility** was also highlighted through the consultation. There was concern that some of the measures being investigated were overly prescriptive with the Development Industry preferring to see some flexibility in terms of how green and blue infrastructure is delivered across a site. Whilst recognising the importance of flexibility the Council are looking to deliver a landscape led AAP with strong ambitions for the natural environment. The Council are keen to avoid piecemeal development which fails to deliver on the wider Green and Blue infrastructure of the SG1 area. Achieving a balance between the two will be a key task in moving the AAP forward.
- 7.4.6 The importance of **peat deposits** across the AAP area was also highlighted. Natural England called for such areas to be avoided recognising the important environmental role that peat plays. The Council agree with this and can advise that the location of peat deposits will be an important factor in identifying development locations. This is already being considered through the Council's site assessment work.
- 7.4.7 The need to ensure a **comprehensive and robust evidence base** was highlighted. Several additional studies were noted, the need for which will be considered by the Council.
- 7.4.8 The identification of land for **off-setting** was generally supported with this offering the opportunity to deliver strategic ambitions for biodiversity across the AAP. The Council has already initiated work to better understand BNG opportunities across the AAP area. This will continue to be developed as the AAP progresses and will need to be considered against other evidence including viability testing.
- 7.4.9 There was mixed opinion as to how **areas of separation** should be considered through the AAP. Some respondents wanted specific areas to be identified while other believed that the need for and extent of such areas should be considered on a case-by-case basis with landscaping and design for individual proposals being allowed to provide sufficient buffering. The Council will need to have regard to both arguments in conjunction with its wider evidence base to determine the most appropriate policy response for this important issue.

8.0 Topic Paper 5: Water Management

8.1 Scope of Topic Paper

- 8.1.1 Topic Paper 5 relates to how the Area Action Plan could influence how water is managed throughout the Broad Location for Growth. The paper seeks to explore the issues the Area Action Plan will need

to consider to ensure that it is sound, robust and is consistent with both national and local planning policy in how it addresses water management. The paper sets out a series of issues around water management to be explored, options about how each issue could be addressed to manage water and the various policy themes and documents which could influence how development is designed, implemented and subsequently managed and maintained.

- 8.1.2 The paper sets out the context for the Area Action Plan, the national policies and guidance which relate to water management, the current local plan policies and those within the CELPR. The paper then looks at the ways in which water can be managed within this national and local context.
- 8.1.3 The paper identifies six key themes for consideration which included the current and proposed evidence base, the identification of flood risk, the reduction in flood risk, potential Flood alleviation / mitigation measures, approaches to sustainable drainage and the management and maintenance of features.
- 8.1.4 The paper sets out the current and proposed evidence base. It then identifies various sources of flood risk and presents options about how the identified risks could be used when allocating land and setting out Area Action Plan policies. It considers whether all flood risk should be avoided at any severity, or whether allowance should be made for development in areas at lower flood risk subject to mitigation.
- 8.1.5 The paper looks at the ways in which the Area Action Plan could seek to reduce flood risk and discusses whether policies should require specific reductions below greenfield rates. It considers whether this could be achieved by controlling discharge rates, either in line with national guidance or at reduced rates and how this could be incorporated into planning policy. It then considers whether areas which have the potential to provide flood mitigation should be identified and whether these should be safeguarded by policies in the Area Action Plan.
- 8.1.6 The paper sets out the sustainable drainage hierarchy in emerging policy DM34 of the CERLP Development Management DPD. This hierarchy prioritises multi-functional sustainable drainage systems (SuDS) which forms part of a landscaping scheme to provide a range of benefits. The paper looks at whether this should be carried forward into the Area Action Plan, whether the Area Action Plan should go further in requiring above ground multifunctional SuDS or whether the national guidance is considered adequate. It then considers the approach to SuDS components and presents options about whether the Area Action Plan and / or associated documents should set out a range of acceptable components.

8.1.7 Finally, the paper sets out issues surrounding management and maintenance of SuDS and suggests two approaches. These approaches include the current system where developers have a choice of options or the implementation of a SuDS Approval Board. The options may change with the implementation of Schedule 3 of the Flood and Water Management Act 2010, which is expected during 2024.

8.2 Summary of the Issues Raised

8.2.1 In total, the number of responses received to questions posed in the topic paper reached 121 from 15 different responders. Full summaries for each response made can be read in Appendix A of this Report, the full responses (with personal details redacted) will be made available on the council's website.

8.2.2 The table below sets out the key issues which have arisen from responders on a question-by-question basis.

<p>Question T5.1: Do you feel that the evidence base identified above represents a reasonable and proportional basis for the production of the Lancaster South Area Action Plan from a water management perspective? If not, what gaps in the evidence do you think are missing?</p> <ul style="list-style-type: none"> • The evidence base appears comprehensive, but the evidence prepared for the local plan is somewhat dated. • A large part of the evidence base is yet to be prepared; this should be published as soon as possible. • The evidence is a starting point but likely to be generic and may not consider the implications to the wider catchment. • Concerns have been raised about the weight given to the JTP in the evidence. The JTP Masterplan is not considered consistent with the 'Broad Location for Growth' identified via Policy SG1. In the interests of soundness and robustness, evidence needs to be prepared in regard of the whole Area Action Plan area. • The Drainage Strategy should be 'Flood Risk and Drainage Strategy' to better reflect the work that is being undertaken.
<p>Question T5.2: Do you feel that the sources of flood risk identified represent all sources? If not, what sources do you think are missing?</p> <ul style="list-style-type: none"> • Not all sources are considered, for instance University Campus, pumping stations should be included as a source of flood risk and more work is needed to reduce discharge from the campus. It is crucial that current and future flood risk from all relevant sources is considered, taking into account Climate Change. • There are a number of large water pipelines in the area. It is not clear whether run-off from the motorway has been considered. • There may be additional ordinary watercourses in the area other than those currently mapped. Ground water flood risk should be considered upfront. • It is difficult to accept allowances have been made for events such as Storm Desmond.
<p>Question T5.3: How should intermittent flood risks and those from unidentified watercourses/culverts and private systems which are not currently mapped be identified?</p> <ul style="list-style-type: none"> • It is not considered realistic to expect that all unmapped watercourses / culverts or private systems to be mapped as part of the Area Action Plan process. However, where possible a comprehensive and detailed survey of watercourses should be carried out to inform decisions in the Area Action Plan. • Constraints may not be identified until detailed surveying and ground investigations have been undertaken by developers on their individual sites. • Flood risks associating from drainage features, where they fall outside the definition of an ordinary watercourse, may require specific investigation. • The approach to flood risk must take account of all sources including public reservoirs (principally to the east of the M6) and sewers. It would be prudent to include policy in the AAP to manage the risk from sewer flooding. • A review of the flood mapping and site reconnaissance should be undertaken that looks at overland flow routes identified by LIDAR and these should be checked on site for interaction with culverts, field drains etc. • The Area Action Plan should contain robust policies to ensure any previously unidentified systems are discovered and the associated flood risk robustly assessed and mitigated by the developer.

<p>Question T5.4: Do you agree with the council's preferred approach in terms of identifying and protecting area at flood risk from development? If not, please explain your preferred approach and the rationale for your choice.</p> <ul style="list-style-type: none"> • All land known to be at risk from flooding should be identified within the proposals map, drainage strategy and GBI Strategy as these risks will impact on the way that growth in the area develops over time. • All areas at flood risk should be identified and protected from development. • It is not appropriate or necessary to identify and protect flood risk areas from development within the Area Action Plan. This is not in accordance with national or local policy. • Risk is not necessarily a barrier to all development. A sequential approach should be taken to avoid areas at the highest risk of flooding whilst allowing for sites, if needed, to come forward in areas of flood risk. There is sufficient existing direction to consider proposals on a case-by-case basis, taking account of potential mitigation measures. • A flexible approach would allow for mitigation and enhancements to be incorporated into design and layout.
<p>Question T5.5: Do you agree with the approach within the JTP Masterplan (page 98) as a starting point to understand how water can be managed across the wider 'Broad Location for Growth' or should the policies within the AAP and the Drainage Strategy go further to manage water and reduce flood risk? If not, what principles would you wish to be considered?</p> <ul style="list-style-type: none"> • Concerned that the evidence seems to be weighted towards the JTP Masterplan. Evidence needs to be prepared in regard of the whole Area Action Plan area. • The scheme will create further risk for vulnerable communities downstream. In-depth research is required over a larger area. • A variety of multi-functional SuDS components should be used to manage water and deliver benefits, including quality, quantity, amenity and biodiversity. • Surface water should discharge to an alternative to the public combined sewer. It is critical that the necessary discharge rights to nearby water bodies are secured. • The policy should ensure a co-ordinated approach to infrastructure delivery. This should be allocation-wide and not fragmented as result of land ownership which would lead to sub-optimal approaches to surface water management. • A co-ordinated approach is equally applicable to foul discharge strategy. The drainage strategy should ensure that the need to pump water is minimised and if pumping is necessary, the number of foul water pumping stations should be minimised.
<p>Question T5.6: Should run-off be reduced below greenfield rates?</p> <ul style="list-style-type: none"> • There is no legitimate basis for requiring run-off rates post development to be lower than greenfield run-off rates. • Base flows can be adversely affected if rates reduced too low. • Run-off should be reduced below the greenfield rates given that the proposed scheme will increase the non-permeable surface area significantly and result in an increased run-off rate. • With climate change and the increase in heavier rainfall, it is advantageous to reduce run-off rates below greenfield rates as this allows for some future proofing. • In specific circumstances, it may be appropriate to take a catchment-based approach to run-off rates below the equivalent greenfield run off rates where there is an associated downstream flood risk and robust evidence can be provided to demonstrate that this will result in a decreased risk. • It is important to consider the volume of run off from the site which can be reduced by utilising source control to maximise infiltration.
<p>Question T5.7: Do you agree with the council's preferred approach in terms of setting out attenuation requirements and peak discharge rates? If not, please explain your preferred approach and the rationale for your choice.</p> <ul style="list-style-type: none"> • A requirement for water discharge rates need not be stipulated within planning policy. This is partly because the matter is dealt with under separate legislation and because a policy could be overly prescriptive. • The Area Action Plan should align with the Partial Review of the Local Plan and should not seek to adopt a different policy to that in the Local Plan. • Setting out a requirement based on national guidance would offer consistency with the LLFAs advice and a rationale and policy compliant approach to setting out attenuation requirements and peak discharge rates. • The Area Action Plan will have a longer timeframe and higher drainage requirements should be included. • The effects on the areas adjacent to the route and at the mouth of the River Conder do not appear to have been factored in. There are other schemes which have not factored in. • The capacity and sizes of the attenuation ponds need to be shown more precisely. • Should the council be minded to advance this issue it could be provided within a Supplementary Planning Document (SPD).
<p>Question T5.8: Do you agree with the council's preferred approach in terms of identifying and safeguarding land for flood alleviation/mitigation? If not, please explain your preferred approach and the rationale for your choice.</p> <ul style="list-style-type: none"> • The Area Action Plan could adopt an approach where land within FZ2 and FZ3 could be used for flood storage. This could achieve flood risk betterment downstream to the benefit of nearby communities, for instance Galgate.

<ul style="list-style-type: none"> • No objection to the concept of identifying broad locations for flood alleviation and/or mitigation and could form part of the equalisation process, although this would clearly need to form part of a masterplanning exercise for the whole 'Broad Location for Growth'. • The nature of any alleviation / mitigation measures would be dependent on the form of development proposal which could only be determined on a site-by-site basis. • The land and areas for flood alleviation / mitigation should be definitive rather than indicative to prevent any future development on these areas. • Flood risk management authorities do not currently have a strong pipeline for future flood alleviation schemes, meaning it is unlikely the robust evidence of the viability of future schemes to support identification of specific sites.
<p>Question T5.9. Do you agree with the principles in the JTP Masterplan? If not what principles should be considered and provide your rationale.</p>
<ul style="list-style-type: none"> • Support for the principle that development should enhance water retention and slow the flow of water where appropriate and possibly with above ground SuDS schemes. • Concern about the over the reliance on the JTP Masterplan as the starting point for consideration on these matters. This is considered to be unsound and the council should reconsider its strategy to be based on the whole 'Broad Location for Growth' without relying on a strategy which has been subject to little scrutiny and has only been developed for one part of the Area Action Plan area as a whole. • The JTP water management principles do not appear to recognise that flooding is often the result of blocked culverts or drains where responsibility rests with the landowner. There should be a principle that landowners are responsible for maintenance and clearance of watercourses and bear the full cost of works if they are carried out by other third parties. • New development must ensure that flood risk mitigation is properly considered and included where necessary, ensuring flood and drainage management is incorporated within new schemes to prevent new flood and not make it worse elsewhere. Green and Blue spaces can play a key role in offsetting these risks as well as being relatively cost effective. • An additional principle around source control should be added to reflect national planning practice guidance and the promotion of natural flood management as a means of achieving betterment.
<p>Question T5.10. Should the plan require the use of above ground multifunctional sustainable drainage systems to be used within development?</p>
<ul style="list-style-type: none"> • The Area Action Plan should not stipulate that these are required within development proposals. • Providing specific requirements for all development proposals is too onerous. • The Area Action Plan should advocate SuDS in general terms to allow flexibility in approach and allow for the best solution on a site-specific basis. • The requirement for SuDS being used is critical along with attenuation and slow conveyance system. Traffic pollution run-off should be addressed. • There are many cases where a 'multifunctional space' that includes water being excluded from open space - a joined up approach is to be encouraged. • Proposals should deliver multi-functional benefits via SuDS which deliver a wide range of additional biodiversity and environmental net gains beyond water quality, quantity, amenity and biodiversity benefits. All proposals are expected by national planning policy to provide multiple benefits where possible. • Multifunctional SuDS will provide extra habitat and increase biodiversity. Some should be used / managed for habitat with the reduction of people / dogs entering. • An over reliance on traditional piped and tanked storage systems should be identified as not acceptable in policy terms. • A multi-functional approach to sustainable drainage should be clearly outlined in the GBI strategy and allocation-wide drainage strategy. • The concept of an integrated Blue and Green Infrastructure points to sustainable drainage (SuDS) being multi-functional in supporting biodiversity and open space therefore the Area Action Plan should take this course.
<p>Question T5.11: Do you agree with the council's preferred approach in terms of the sustainable drainage hierarchy? If not, please explain your preferred approach and the rationale for your choice.</p>
<ul style="list-style-type: none"> • Agree with the approach in emerging policy DM34 of the CELPR. • There should be a requirement for multi-functional drainage systems, but this should be underpinned by robust evidence. • Specific requirements would be too onerous. • Clarity on how and the types of water treatment system to be applied is needed. • Requiring use of above ground multi-functional SuDS follows the path of guidance on such matters and likely updates to the current non-statutory technical standards for SuDS. • Ultimately this is a matter to consider from an urban design perspective, rather than a flood risk perspective. • Policy DM34 sets a district-wide policy but expectations in South Lancaster should be different, for example stronger controls on the discharge of surface water into the public sewer.

<ul style="list-style-type: none"> It is likely that the Area Action Plan will have a longer timeframe than the CELPR and therefore a higher drainage standard should be followed.
Question T5.12: What types of sustainable drainage components should be prioritised?
<ul style="list-style-type: none"> Any approach will need to be flexible. It is important to recognise that each site will be different topographically and hydrologically. The council will need to carefully consider how any SuDS components will be identified at this stage and carried forward into the Area Action Plan given the lack of evidence of site-specific ground conditions in the Area Action Plan area. Above ground components should be used as this system would be more cost effective to maintain. Above ground drainage is preferred because its performance and maintenance can be monitored more effectively. A lack of routine maintenance poses a flood risk. If not maintained components will be ineffective. Multifunctional SuDS components should be prioritised, in line with national guidance and the LLFA guidance. Multifunctional green space SuDS would be preferred to highly engineered elements as these offer a wide range of benefits and may be used as part of a Net Gain Strategy or recreational space provision. The approach to drainage and landscaping should be intrinsically linked through policy. The opportunity presented by tree-lined streets to incorporate bio-retention tree pits within the design of development should be explored. Above ground SuDS will provide better habitats for wildlife. Consider water re-use opportunities such as grey water recycling which may be more suited to some types of development.
Question T5.13: Should the Drainage Strategy set out technical guidance for sustainable drainage components or refer to existing national and United Utilities technical guidance?
<ul style="list-style-type: none"> Whilst technical guidance could be a helpful within the drainage strategy, we would urge caution when considering its insertion into development plan as technical guidance may be updated, which could lead to a strategy quickly being out of date. It would be prudent to refer to national guidance generically to ensure the approach remains up to date. Recommend reference to existing national technical guidance. However, some cross over to design designs for urban realm may be useful. Extensive technical guidance already exists and signposting to the guidance is recommended. This is preferable to the council producing new guidance on the matter. Unless there is a significant gap in the guidance that would prejudice delivery of development then it would be better the Area Action Plan focus its resources elsewhere. Technical guidance that goes into more site-specific detail should be part of the Drainage Strategy. Set out technical guidance to strict criteria which ensures maintenance and checks to ensure that they are in place and functioning over time.
Question T5.14: Do you agree with the council's preferred approach in terms of the setting out sustainable drainage components? If not, please explain your preferred approach and the rationale for your choice.
<ul style="list-style-type: none"> The components do not need to be specifically described in the policy as they are specified in technical documents. The technical design of SuDS components is set out nationally and further detail in the strategy, design code and policy are not necessary. Agree with the approach to setting out the list of drainage components within the drainage strategy as guidance, but not including them within policy. Setting out a range of components in the Drainage Strategy and Design Code and referred to these in policy is the most appropriate way forward. This would ensure consistency in component delivery, design terms and future maintenance and adoptability. The general selection of SuDS components would be most appropriate as the principle of multifunctional SuDS has already been established within the hierarchy set out in Policy DM34. Something as vital to prevent flooding and futureproof the area must be stipulated clearly the council policy. SuDS are often not undertaken properly and then fail. Parish Councils have the option of adopting drainage policies within neighbourhood plans.
Question T5.15: Do you have a preferred approach in terms of the management and maintenance of sustainable drainage systems? Please explain your preferred approach and the rationale for your choice.
<ul style="list-style-type: none"> The concept of SuDS approval body (SAB) is appropriate as this would provide a mechanism for the LLFA to approve, adopt and maintain SuDS features to more than one property. Further exploration is required to understand what is involved in a SAB and what it would mean in terms of technical requirements. The implementation of SuDS Approval Bodies (SABs) may be explored but given the emerging legislation on this matter it cannot be assumed that a SAB will be a viable option.

<ul style="list-style-type: none"> • It may be that a separate private SAB could be established as part of the Area Action Plan process. • The current 3-way adoption of SuDS does not always result in the most cost-effective or efficiently designed drainage system, but without the SAB in place then retaining the existing system until such a time that a SAB is implemented will need to be the way forward. • The preferred approach for the management of SuDS would be either United Utilities or the Local Authority. • All SuDS should be designed to adoptable standards and subsequently offered for adoption by an appropriate adopting body. • The current approach provides developers within flexibility. • The existing system with maintenance agreements covered by appropriate legal agreement is appropriate. • If the maintenance package is given to several parties, negligence, inefficiency, and inconsistency could result in the failure of the SuDS features. • The SuDS management needs to be maintained to a high standard to ensure flooding does not occur. • There should be a clear framework for managing and maintaining all drainage components. Any approach to management and maintenance should include on-site sustainable drainage systems after development takes place. • The management and maintenance of on-site watercourses should not be left in fragmented ownerships but there should be a co-ordinated management approach.
<p>Question T5.16: Are there are any other points you wish to raise which have not been captured in responses to other questions in this Topic Paper?</p> <ul style="list-style-type: none"> • Glasson and Lower Thurnham and Conder Green appear to have been overlooked in the assessment of flood risk. There are major flood risks around these areas, and Galgate, which JTP, the council and the Canal and Rivers Trust seem to be unaware of and have a lack of understanding of vulnerability of the area. • Concerns over the JTP Masterplan and impressions of this being low-key development. The scale of what is being proposed is significant as are the flood risks associated with it. It is not clear that the flood risk for all these projects have been co-ordinated or accurately calculated and accommodated for. • The council should consider the maintenance arrangements for any watercourse in the Area Action Plan area. Existing watercourses should be protected and, where appropriate, enhanced through new development. The culverting of watercourses should be avoided. • When designing a layout, it is critical to consider the future ownership of and access to any on-site watercourses for maintenance purposes. No development should occur within 8 metres from the bank top of any ordinary watercourse, this includes the construction of structures such as walls and fences. • It will not be acceptable for watercourses to be subject to maintenance regimes associated with fragmented riparian ownership. Applicants must demonstrate that on-site watercourses are subject to clear and co-ordinated management and maintenance regimes. • The Area Action Plan should include key principles for the management of surface water during the construction phases of development to ensure no increase in flood risk elsewhere and protection of the water quality of receiving watercourses. This is particularly important to establish clear collaboration and cooperation between developers across multiple allocations. • The Area Action Plan should require developers to provide as-built details of any flood risk assets, including SuDS components and natural flood measures, in an appropriate GIS format for these to be recorded by the relevant flood authorities, particularly the LLFA. • An allocation-wide strategy addressing rights to discharge to water bodies, consistent with the Environment Act 2021, should be prepared. • Separate settlements would present a potential infrastructure challenge and emphasises the importance of considering the opportunity for strategic infrastructure links via the new road infrastructure. • Development should not encroach around United Utilities assets. • The Area Action Plan drainage strategy needs to be more explicit about if, how and when use of the foul system for surface water disposal may occur and what the impacts would be. • The Area Action Plan needs to address demand for water, in particular policies and design codes that reduce water consumption. • It is not clear whether attenuation systems can be linked to water requirements for prospective fruit and crop growing.

Table E: Table to summarise responses to Topic Paper 5: Water Management

8.3 Key Actions Arising

8.3.1 The issues which have been raised, and are briefly summarised in Table E provide for a thorough and wide ranging response to the questions posed. Moving forward the council will seek to engage with responders further to explore the issues and concerns raised as progress on the draft Area Action

Plan advanced. However, it is noted that the key actions below are issues which need further exploration.

- 8.3.2 Concerns have been raised with regard to the **evidence base**, how up to date it is and the relevance of evidence produced for the local plan. The council will consider the appropriateness of existing evidence and further evidence is being produced to address water management. Evidence will be published once it is available.
- 8.3.3 Concern expressed regarding the weight being given to the **JTP Masterplan for Bailrigg Garden Village** evidence. Comments noted that the masterplan does not reflect the geographical scope of Area Action Plan. It is agreed that the Area Action Plan should consider flood risk and water management across a wider geographical area. The JTP Masterplan for Bailrigg Garden Village presents principles for and indicative water management areas. Concern has been expressed that the principles are generic. The council has previously produced evidence to support the designation of the Broad Location for Growth and further water management evidence is being prepared.
- 8.3.4 Issues around the **identification of flood risk** have been raised. The sources identified will be considered in the light of the responses and updated where necessary, and the council will ensure that the most up to date climate change allowances are used in the final assessment of sites and the impacts of development on flood risk. Overland flow routes will be assessed using LIDAR to inform the flood risk assessments and drainage strategy. The flood risk assessment and drainage strategy are intended to ensure that sites can be developed without flood risk to existing and new development. Further detailed work will be required by developers, including detailed on-site surveys and assessments.
- 8.3.6 Conflicting responses have been received about to the **identification and protection of land at flood risk**. The approach will be considered in the context of national policy and guidance in relation to flood risk, SuDS and blue/green infrastructure and the garden village principles.
- 8.3.7 **Multifunctional SuDS** are generally supported but there is a mixture of responses about how they should be used. Some respondents consider that they should be flexible, but others consider that SuDS should be required to be above ground and multifunctional to provide a range of benefits. There are a mixture of responses about specifying a range of acceptable components. The council is seeking to ensure that development in the Broad Location for Growth plans for opportunities to reduce flood risk in accordance with national policy and guidance. It is also seeking an exemplar scheme based on the garden village principles which highlight the importance of blue and green infrastructure. The council will consider the responses and the way forward in the light of national

and local policy and guidance in relation to flood risk, SuDS and blue/green infrastructure and the garden village principles.

- 8.3.8 Comments have been made that there should be an **integrated response to infrastructure delivery** and surface water should not drain to combined sewer. Additional water management evidence will be progressed to ensure that water management infrastructure within the area, within development sites, between sites and in green and blue spaces is coordinated.
- 8.3.9 Concern has been raised about the **risk posed by development to existing communities** downstream. The water management evidence will consider the impact of water-off from development, how this can be managed and attenuated to ensure there is no adverse impact on existing communities.
- 8.3.10 Conflicting opinions have been given regarding the **approach to run-off rates and safeguarding land for alleviation/mitigation**. Some respondents do not consider it necessary to set out attenuation requirements, run-off rates or safeguard land, others consider this important. The approach will be considered in the light of national and local policy and guidance to and whether setting out attenuation requirements and reducing run-off rates is the appropriate means to ensuring development takes opportunities to reduce flood risk. The evidence base will need to be robust to secure such the appropriate approach.
- 8.3.11 The **management and maintenance of SuDS** has been raised as a concern by respondents. At present the future is uncertain and the approach in the AAP will be influenced by the changes in legislation anticipated later this year. This should include the investigation of Sustainable Drainage Approval Bodies (SABs) which may provide a more locally accountable option in future management and maintenance of drainage features.

9.0 Topic Paper 6: Creation of Sustainable Places and Communities

9.1 Scope of Topic Paper

- 9.1.1 Topic Paper 6 relates to a range of issues around how the Area Action Plan could influence the creation of sustainable places and communities within the Broad Location for Growth. The paper seeks to explore the issues the Area Action Plan will need to consider, to ensure that it is sound, robust and is consistent with both national and local planning policy in the way it seeks to support development will deliver well-designed places to live and work.
- 9.1.2 The paper sets out the context for the Area Action Plan, the national policies and guidance which relate to sustainable places and communities, the current local plan policies and those within the

CELPR and the existing and current evidence base. The paper identifies seven key themes for consideration including current and proposed evidence, the design of buildings and places, infrastructure delivery, the stewardship, management and governance of the community, the promotion of economic development, providing the right mix of housing and provision of local services.

- 9.1.3 The paper looks at the role of design of buildings and places and how it could be considered in the Area Action Plan. It explains that the Area Action Plan will be looking not create sustainable places which reflect the garden village principles. The paper sets out a range of design principles identified in the JTP masterplan and explains the National Design Code and the ten characteristics considered to be significant. It seeks to considers whether the principles identified are the logical place to start when considering how the Area Action Plan will address design. The paper provides three approaches to design coding: production of a design code to support the Area Action Plan, inclusion of a design code in the Area Action Plan or allowing developers to consider design against national policy without locally specific design coding.
- 9.1.3 The paper considers how the delivery of infrastructure within the Board Location for growth could be addressed within the Area Action Plan. It sets out the types of infrastructure to be investigated and the key infrastructure stakeholders it is considered necessary to engage with. The paper discusses a range of matters to be considered in the context of infrastructure and how they may be addressed. These matters include viability, healthcare, education, community facilities, open space and recreational pressures, transport, utility connections and environmental features.
- 9.1.6 The paper sets out the context to stewardship, management and governance of the community and discusses the three options including private management, management by a charitable trust and council led management.
- 9.1.7 The paper sets out the local policy position to economic development, the principles/ambitions within the JTP Masterplan. It acknowledges that employment requirements should be resilient to future demands. The paper provides information about the Economic Prosperity Strategy (2022) which has been commissioned to support the Area Action Plan. This Strategy identifies the emerging job sectors where growth could be achieved and considers a range of policy recommendations in relation to the provision of land and floorspace which could enhance the location's contribution towards sustainable development. The paper presents potential approaches to employment policy in the Area Action Plan, including a flexible policy context where specific land is not allocated, policies which allocate land for the short term (up to 2031) and policies which identify land for the short, medium and longer terms.

9.1.8 The paper sets out the existing policy background and evidence in respect of housing provision. It suggests that housing mix should be determined using the Strategic Housing Market Assessment (2018), the placemaking principles in the JTP Masterplan and the densities required to achieve the number of homes envisaged in policy SG1 of the SPLA DPD. The paper anticipates the affordable housing requirements in the adopted local plan providing the starting point for the Area Action Plan but recognises that there are a wide range of environmental and placemaking requirements plus infrastructure provision which may influence the final requirement. It then discusses the need to explore specialist housing within the Area Action Plan.

9.1.9 The final section of the paper looks at the role of a local centre and the services which are considered important for a community to function well, reduce the need to travel and provide an economic function. The elements which could constitute a local centre, for example retail, and are considered together with how these could relate to education and health facilities and meeting places.

9.2 Summary of the Issues Raised

9.2.1 In total, the number of responses received to questions posed in the topic paper reached 135 from 16 different responders. Full summaries for each response made can be read in Appendix A of this Report, the full responses (with personal details redacted) will be made available on the council's website.

9.2.2 The table below sets out the key issues which have arisen from responders on a question-by-question basis.

Question T6.1: Do you feel that the evidence base identified in Table 3.1 represents a reasonable and proportional basis for the production of the Lancaster South Area Action Plan? If not what gaps in evidence do you think are missing?
<ul style="list-style-type: none">• The evidence used for the Local Plan is somewhat dated and requires update as part of the Area Action Plan process.• A large part of this evidence base is yet to be prepared and should be published as soon as possible.• Concerned that the evidence seems to be heavily weighted towards the JTP Masterplan area which is not a formal development plan document or SPD, it has not been examined and is not consistent with the 'Broad Location for Growth' identified via Policy SG1. The JTP Masterplan is not a robust starting point and in the interests of soundness and robustness, evidence needs to be prepared in regard of the whole Broad Location for Growth.• There appears to be no specific evidence base for education provision, healthcare provision, masterplan for future growth at Lancaster University, renewable energy generation, improvements to the footpath / bridleway network, railway strategy, strategy for securing a skilled workforce, heritage assessment, utilities assessment and a soil and agricultural quality survey.• Further work is necessary to determine an appropriate methodology for calculating developer contributions.• The South Lancaster Growth Catalyst is not only seeking to address the delivery of a new road and transport infrastructure in South Lancaster it is also a funding / delivery modal for local infrastructure.• There are opportunities for the allocation of employment land within areas outside of the JTP Masterplan which is supported by the direction of Policy SG1.

Question T6.2: Do you agree with the garden village principles above in the context of achieving a sustainable place and community? Are there any principles which should be considered more valuable in the context of preparing the Area Action Plan? If so why?

- The garden village principles will need to be respected to comply with the Government's terms of the HIF grant.
- Points 1, 2 and 5 are particularly valuable in the creation of a cohesive and sustainable community.
- Would welcome the inclusion of the 10 principles of Active Design within the Area Action Plan and any forthcoming design code. These principles would help to promote opportunities for sport and physical activity.
- Supports and endorsement for the key design principles which will be key factors in the design evolution for development proposals coming forward.
- The garden village principle around cultural, recreational and shopping facilities should be expanded to reference wider social infrastructure needed to support a sustainable garden village, for instance healthcare and education.
- The garden village principles do not reference the University which should be rectified.
- Broadly support the principles stated, however recommend that reference is made to the updated DfT Policy Circular 01/2022.
- The principles should include 'land value capture for the benefit of the local community'. This is one of the key principles of the garden village movement inherent to achieving a high-quality balanced development. All areas of land should contribute to the wider development as a whole. Without this, development will inevitably be dictated by land ownership rather than by design and quality.
- Local jobs (bullet point 6) are important for the garden village but will be the hardest to deliver for the Council. The Area Action Plan must include schemes and incentives for employers to locate their businesses in the garden village.

Question T6.3: Do you agree that issues of design should be considered in the Area Action Plan? How do you feel interested parties should be engaged in relation to design? Should this include the role of workshops to inform matters of design?

- Design is key to the success of the garden village, the Area Action Plan should provide clear and concise direction on the design of new development which is then demonstrated via parcel-specific masterplans.
- Given the requirement for design to play a greater role in the decision-making process, the Area Action Plan should set the ground rules which then should be taken forward in a design code. Consideration should be given to the use of Design Review Panels which incorporate local people and other key stakeholders.
- The Area Action Plan should ensure housing and commercial buildings meet the Council's Climate Emergency, they should include things like solar panels, vehicle chargers, swift boxes, and hedgehog holes.
- Design should be counterbalanced against other considerations such as infrastructure delivery priorities and viability.
- It is important that any design is informed by a site-specific technical understanding and not be overly prescriptive and allow for flexibility.
- Masterplans can follow a similar process to strategic sites identified in the Local Plan - an outline planning application could be approved and then followed up by a supplementary masterplan at a reserved matters stage. This would allow the Area Action Plan to make swifter progress to adoption, without being weighed down by overly prescriptive policy on design.
- The mix of housing for a diverse community should include supported living and multi-generational living.
- Design is a subjective matter, any design related strategy should be the cumulation of effective, pragmatic and constructive engagement. This should include the local community, neighbourhood groups, design experts and members of the development industry. There may be conflicting aims within these groups and so early engagement will be essential in developing a design strategy.
- Workshops can present a valuable tool in achieving meaningful stakeholder engagement, but the Council should also consider seminars, leaflet drops and websites.

Question T6.4: Do you feel that the high-level principles set out in the JTP Masterplan provide a reasonable starting point for preparing the Area Action Plan for the wider 'Broad Location for Growth'? Do you feel any of these principles have greater value in terms of the plan-making process? If you do not consider these principles to represent a reasonable starting point what should? Please provide rationale to your response.

- There is no evidence or information of other options which have been considered by the Council and the justification for why any such options are not favourable. This is not considered to be a sound basis upon which to develop the AAP.
- The JTP Masterplan is only the starting point as it is a principally landscape-led concept document which is not underpinned by evidence on deliverability or viability. The masterplan should not simply be retro-fitted to the wider area. The Action Plan needs to, as a minimum either comply with Policy SG1 or justify deviations from it.
- However, the high-level spatial principles set out in the JTP Masterplan provide an important and reasonable starting point.
- The principles provide a reasonable starting point however it is important that Lancaster University is referred to in Principle 1. The campus is a significant part of South Lancaster and it is critical that its distinct identity is protected.

<ul style="list-style-type: none"> • The principles relate only to the garden village but provide a reasonable starting point for the Action Plan that focuses upon the creation of wider development. • The principles should ensure an improvement to biodiversity and habitat types. • Further principles could be added around the availability and proximity to education and health facilities. • The University has its own masterplan for its campus but SG1 states that the latter is subordinate to the Action Plan and therefore some review of the University masterplan will need to be part of the Action Plan.
<p>Question T6.5: Do you agree that the National Design Guide provides a logical and robust starting point for the creation of well designed places, spaces and buildings? If not why not and what should an alternative starting point be?</p>
<ul style="list-style-type: none"> • The National Design Guide only provides a general approach that is applicable across the country, so it is essential that local characteristics are considered. This should form the basis of the master planning exercise for the whole Action Plan area. • The Guide is too vague or unambitious in places and therefore it is only a starting point to which local aspirations must be added. It does not go far enough to provide wildlife friendly communities. • It is important to maintain flexibility and consider site-by-site issues and opportunities. • Characteristic 10 relating to homes and buildings is silent on environmental impact. Perhaps a note could be added to strengthen specifics about aspiring to Passivhaus- standard homes as put forward in Topic Paper 3.
<p>Question T6.6: Do you agree that this provides the appropriate starting point to address the issues of design within the Action Plan? If not, which approach do you think would be preferable? Do the approaches presented represent all available approaches to the Council in relation to this matter?</p>
<ul style="list-style-type: none"> • The production of a well research and well written design code will seek to secure high standards and consistency throughout new development whilst still allowing flexibility for change in construction techniques and emerging technologies over time. The council will need to be mindful of striking the right balance in terms of the level of prescription a design code offers. • When applied in tandem with the National Design Code a design code in the Area Action Plan may provide an appropriate framework for the whole area. • A specific design code that must be followed to ensure the most environmentally friendly housing is provided. • Design codes are critical to the success of the garden village to provide consistency and maintain quality standards. • Lancaster Canal should be referenced in any coding policy. The waterway has its own character, and any coding should explicitly take account of this. • National guidelines are a low bar and fall short of the standards and vision for the area that Lancaster citizens are expecting. • There is no evidence available to support a specific design code in the Area Action Plan nor is there any information of other options which have been considered by the council and the justification for why any such options are not favourable. This is not considered to be a sound basis upon which to develop the Area Action Plan. • The master planning process should be started afresh, taking all evidence into account. A new approach to design must be taken that is based upon evidence and this consultation process. • Development should not be subject to the rigid application of a design code but allow a degree of flexibility to enable development proposals which respond to site-specific characteristics and other matters such as financial viability. • The opportunity to work more closely with the Council in the preparation of the design code and sharing knowledge as a landowner and developer would be welcomed.
<p>Question T6.7: Do you feel that there are any aspects of infrastructure missing? Do you consider that any elements of the infrastructure referred to in Figure 5.1 which should have a priority in terms of delivering in South Lancaster? Please provide rationale to your response.</p>
<ul style="list-style-type: none"> • The infrastructure list needs to reflect the priorities established in the funding model for strategic infrastructure and broader commitment made in relation to the South Lancaster Growth Catalyst. • The requirements should be linked to a clear developer contributions strategy which accommodates early delivery of certain strategic infrastructure and recovery via developer contributions. • Analysis needs to be couched in an understanding of why piecemeal development is inappropriate and the need to future proof development beyond the plan period. • Infrastructure provision should be factored into the viability assessment which is not currently unavailable. • It is critical to understand how infrastructure will be funded and delivered. If the burden of its delivery is to be placed on the development industry, then viability evidence should be provided. • There needs to be further consultation on the next levels down of each of the listed items with guidance on what specific infrastructure expectations really are. • Outdoor sports provision and indoor sports provision should be included as part of key infrastructure, separate to open space/recreation. • Areas solely for wildlife (excluding people and dogs) should be identified.

<ul style="list-style-type: none"> • There is no mention of pre-school care/education or of provision of services for older people, for example extra care/nursing home. • There is no reference to the provision of park and ride, nor safeguard a potential site for a future railway station. • There should be reference to an EV Charging Station which would be set close to the A6 corridor and new link road. • The user hierarchy should place vulnerable road users at the top and prioritise low carbon development and travel.
<p>Question T6.8: Do you feel that there are any infrastructure providers that you think are missing from Figure 5.2?</p>
<ul style="list-style-type: none"> • The list should include key stakeholders inside the City Council; Network Rail given the proximity of the West Coast Mainline; representatives from the development industry (such as the Home Builders Federation); Active Lancashire and the relevant governing bodies for sport should be to help protect, assess and deliver the necessary sports infrastructure with local community; Sustrans, the Ramblers Association, Local Walking and Cycling Groups, Equestrian groups; Public Transport Operators; Bus Infrastructure Providers; EV charging station providers; British Waterways; Canal & Rivers Trust; Country Landowners Association; Dental care providers; Lancashire County Council Public Health team; Voluntary sector which might require facilities from which to operate and Food providers / supermarkets
<p>Question T6.9: Do you have any further views on the Council's approach to the delivery of infrastructure through the Area Action Plan process?</p>
<ul style="list-style-type: none"> • The Area Action Plan should set out a clear approach to developer contributions which ensures that they are collected on a fair, proportionate and consistent basis from all benefitting development, irrespective of when that development comes forward. • The approach to developer contributions needs to be sufficiently flexible to facilitate the recovery of forward funded elements of strategic infrastructure. • The approach to infrastructure priorities needs to have regard to the council's role in the South Lancaster Growth Catalyst. • Any infrastructure should be accounted for in the viability assessment. • Section 5.5 is effectively a warning that some of the expectations may be dashed by a viability test takes precedence over the infrastructure prescribed. • An early-stage high-level viability assessment should be published to reassure residents or allow them to reconsider their support. • If the council decide to descope infrastructure to fulfil the viability tests, then early disclosure will be essential. • The council will have to ensure developers remain committed to the project. If not, then a publicly owned Lancaster Development Corporation (with CPO Powers) who can undertake the development and plough any profits back into the district should be undertaken. • It is anticipated that the scope and cost infrastructure will evolve as the Area Action Plan progresses and there will need to be several iterations of the viability test. • Early dialogue with the viability consultants would be welcomed to ensure meaningful discussion. • Early engagement with site promoters is required. • It is vital that all infrastructure providers fully engage in the with the Area Action Plan process. • All healthcare, education, community facilities, POS, transport, utility requirements should be set out in detail within the Area Action Plan to enable the council to approve applications for development within the garden village immediately after the adoption of the Area Action Plan. • The council should use Sport England's Sport Facility Calculator and Playing Pitch Calculator as a guide to indoor and outdoor sport provision. Local standards are not appropriate for outdoor sports. • The area is lacking in pre-school spaces and the new housing will only make this worse so it should be planned into the development. • The environmental features should be managed appropriately, and some more sensitive environments will require the exclusion of people and dogs. • Education provision as a key component of the Area Action Plan. • How the council know that the two proposed primary schools will be sufficient? How is projected provision calculated? • The statement should be a more positive commitment to the health of the residents. If the Area Action Plan identifies opportunities for residential development which is not part of the garden village then all the considerations identified in Topic Paper 6 should be applicable to these areas as well as the garden village. • A hybrid approach to land management could be considered - for example areas of POS within a specific development parcel could be managed by a private management company whereas the larger swathes of amenity space could be managed by a charitable trust. The Action Plan should provide direction on the management of public spaces to enable planning approvals to follow quickly after the adoption of the plan.

<ul style="list-style-type: none"> Given this is an opportunity to shape a new community, there is possibly a moral imperative that the plan is visionary and adds to the lives of the people who are resident there. It would be shameful if the plan became a way of addressing current issues because of financial imperatives rather than using it as a way to plan properly.
<p>Question T6.10: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches to the management of spaces and places which you think are missing? Please provide further detail on what you believe those approaches to be.</p>
<ul style="list-style-type: none"> The County Council as education authority, is reviewing its methodology for calculating and collecting education contributions and its finalised approach needs to be integrated with the wider developer contributions and implementation strategies. There is not sufficient information at this time to provide an informed position on what the best approach would be to the management of places and spaces. Any future should be flexible and offer a degree of choice for developers and the council alike. It is unclear at this stage how proposed sports facilities will be maintained and managed. It is strongly advised that the necessary national governing bodies are approached regarding this matter. The council will need to provide substantive evidence to justify any approach where the use of management companies are not be deemed acceptable. The aim of a private company is to make money which means that the places and spaces won't have all the money put back into them unlike a charity or local council. There is a lack of accountability in approach A and the potential that management overheads and profit margins will not stay within the local community. The preferred approach is Approach C with the council taking responsibility in the early stages of development with Approach B coming with time as the new community grows and establishes itself. It is likely that in the initial years, before a sizeable community is established, that some form of council support and governance will be required.
<p>Question T6.11: Which of the ambitions of the JTP Masterplan do you consider to be the most relevant to the preparation of the Area Action Plan? What would that opportunities and challenges to delivering these ambitions? Please explain your rationale to your response.</p>
<ul style="list-style-type: none"> The JTP Masterplan is a design concept document that needs to be reviewed against evidence on viability and supporting infrastructure. All the JTP employment principles are vital to successfully create high quality employment to support new households. The following ambitions are supported: Be a thriving place of work, not a base from which to commute; Create a local and diverse employment offer, making work more convenient and people's lives easier; Offer diverse economic opportunities that increase productivity and create hubs where people can come together and work, share knowledge and skills. Connections to the University Campus and Innovation Campus are key to the economic growth in South Lancaster. The role of the University and its future growth /expansion should be acknowledged and referenced throughout the Area Action Plan. Development should be mixed use and provision should be made for other forms of employment including office, high tech and logistics given the proximity to the University and M6. A collaborative approach is required with all key stakeholders in the process. A key ambition should be that the garden village should be a thriving place to work, not to commute from. It is highly unlikely that development here will create sufficient employment opportunity to discourage commuting. The building of a new motorway junction seems to support commuting opportunities. How new development can support the working population of Lancaster should be explored, ensuring new housing meets their needs. Housing needs to be available for all sections of the community and should be adaptable for their entire lifetime. Provision should be made for homeworking opportunities and hot-desking within new development.
<p>Question T6.12: Do you consider the economic sectors described represent reasonable and appropriate types of employment for South Lancaster. If not why not? Please provide rationale to your response.</p>
<ul style="list-style-type: none"> The sectors identified are generally appropriate. The Area Action Plan should consider options for how these sectors would be targeted and support this with an appropriate evidence base. The sectors identified should also include Health (in recognition of the Health Innovation Campus); Education (in recognition of the University Campus); Professional, Financial and Business Services; Agriculture; Recreation and Environmental management. The range of employment sites in the adopted Local Plan are considered unsuitable for delivering a full range of modern business needs. A range of B2 and B8 uses should be considered suitable. Advanced manufacturing / transport and storage are less favourable as large warehouse and industrial buildings will not fit in with the overall designs of the wider area.

<ul style="list-style-type: none"> • The allocation of sites in the Area Action Plan area offers the opportunity to provide deliverable employment sites to meet future employment needs in the District. • A flexible approach will be needed to meet the needs of South Lancaster. • The DLP Strategy Report makes use of data from Summer 2022 and was produced before the latest economic downturn. This data and its implications should be re-investigated.
<p>Question T6.13: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches to the delivery of employment which you think are missing? Please provide further detail on what you believe those approaches to be.</p>
<ul style="list-style-type: none"> • There is an opportunity to deliver employment in the right form via the Area Action Plan. • Land for short/medium and long terms should be identified to ensure appropriate uses and buildings. • If land is not identified there is a risk land for employment will be squeezed out by more profitable housing development. • The Area Action Plan should distinguish between employment development and University related growth/expansion. • The Area Action Plan would benefit from identifying areas which should be promoted for growth of the University estate, including areas to the east of the M6 and to the west and south-east of the Campus. • It is essential to bring employment uses through early in the process and this is best achieved by identifying land for such uses in appropriate locations. • The data needs to be reviewed in light of recent economic events.
<p>Question T6.14: Do you consider the indicative housing mix within the Local Plan to be a correct and appropriate starting point for understanding the housing mix required within the 'Broad Location for Growth'? If not, why not. Please provide rationale for your answer.</p>
<ul style="list-style-type: none"> • The mix is an appropriate starting point provided it is supported by a Housing Strategy. • The SHMA dates to 2018, it would be prudent to prepare an update to the SHMA to ensure that the Area Action Plan delivers the homes that are needed. • Over time the identified needs for a dwelling type and size is likely to change. This is particularly the case in light of the COVID-19 Pandemic. • It is important viability is considered when determining the mix. • Allowing a flexible housing mix will encourage the delivery of housing which responds to changing needs. • The evidence and Area Action Plan should address specific types of housing such supported accommodation for older people/mobility impaired/those with additional health needs. • Restrictions, such as Article 4 directions, should be used to ensure that the house types required to create sustainable communities are retained. • The Area Action Plan should confirm that student accommodation is suitable for delivery in South Lancaster with a strong preference for this to be located primarily at Campus and other appropriate locations within the wider University estate.
<p>Question T6.15: Do you believe that the Local Plan threshold of 30% represents a reasonable starting point for understanding the affordable housing requirements within the 'Broad Location for Growth'. Given the context for development in this area do you think the affordable housing requirements should be higher or lower than the Local Plan position? Please explain your rationale for your answer.</p>
<ul style="list-style-type: none"> • The Local Plan threshold for affordable housing needs to be viability tested against all supporting infrastructure which is required as part of the Area Action Plan. • Any policy should be flexible as to be able to react to market conditions or site-specific viability considerations. • Would not support a significant reduction below the local plan figure. • Will developers find a way of getting round building affordable homes due to building conditions, profit margins etc.
<p>Question T6.16: Do you feel that the types of housing which are set out in this Section represent all types of housing which should be explored within the 'Broad Location for Growth'? Are there any types of housing which are missing from this section which should be considered?</p>
<ul style="list-style-type: none"> • Housing should reflect a greater diversity and include: More bungalows; Supported living housing; Co-housing for over 55s; Multi-generational housing; Community-led housing and Care of the elderly and those with particular needs • The delivery of a mix of housing types to help meet local housing need and to help satisfy future housing aspirations is supported. • It will be necessary to ensure that housing does not get bought up by buy-to-let landlords for student tenants. • Mechanisms should also be established to regulate Houses of Multiple Occupation (HMOs) often populated by students.
<p>Question T6.17: Do you agree with the inclusion of a new Local Centre as part of development within the 'Broad Location for Growth'? What do you consider to be the most important elements of any local centre?</p>
<ul style="list-style-type: none"> • A local centre is integral to the success of the community.

<ul style="list-style-type: none"> • The main local centre should be located centrally in the Garden Village development and that it should meet the needs of residents without competing with Lancaster City Centre. • A local centre should include Healthcare facilities; A community hall and meeting space; Education; Open space; Retail provision; Post office (not just a post box); Newsagent; Grocery shop; Bakery; Greengrocer; Butcher; Cash machine; Barber / hairdresser; DIY shop; Primary school; Cafes and Commercial services. • Smaller complimentary centres, community facilities and/or commercial activities should be distributed through the Area Action Plan. • Local centres should be readily accessible to the population they serve and should be centrally located. This should be reflective of the patterns of growth in the locality. • High quality pedestrian, cycle and public transport links will be crucial. • A local centre is needed to reduce travel requirements in vehicles. • A more accessible local centre may be closer or on the new A6/link road corridor which means that it will be also accessible for those travelling along both routes therefore increasing footfall and viability. • The local centre should not compete with existing facilities of designated centres and the University Campus.
<p>Question T6.18: Do you feel that the provision of a new foodstore is an important element of the development proposed in South Lancaster?</p>
<ul style="list-style-type: none"> • Provision should be underpinned by appropriate retail evidence. • The current evidence not up to date. • A garden village of 2,500 people would sustain a number of small and medium sized foodstores. • A small convenience store would enhance the community hub and avoid the need for longer journeys. • A foodstore should be sited in an accessible location and should be available to passing trade and not just local residents making the A6 / new link road corridor the most suitable location. • A large supermarket could swamp the local centre, restrict choice and draw customers (and their cars away) from the existing supermarkets. • It would be a shame if a large supermarket took business away from the community-led local centre. Any large foodstore would need to complement, rather than compete against, local stores. • A foodstore should not preclude the development of smaller community facilities or commercial activities elsewhere, as part of ensuring sustainable development is achieved across the Action Plan Area.
<p>Question T6.19: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches to local centre provision which you think are missing? Please provide further detail on what you believe those approaches to be.</p>
<ul style="list-style-type: none"> • A key objective of the garden village is to provide facilities that reduce the use of cars. A local centre ought to be sufficient for its own residents but not attract traffic from the wider catchment area. • Providing for the wider area would lead to even greater traffic flows and environmental impacts. • The area needs to accommodate all local needs including doctors to ensure a reduction in travel needs. • A small coffee shop could provide an additional meeting space for the community. • A local centre should serve a wider need and be accessible both to new development and those using the A6/new link road corridor to maximise demand and viability.
<p>Question T1.20: Are there any other points you wish to raise which have not been capture in responses to other questions in this Topic Paper?</p>
<ul style="list-style-type: none"> • All development contained within the designation of the Broad Location for Growth should contribute to infrastructure requirements in a fair and equal manner. • The council must not permit piecemeal development in this area which does not seek to address matters of strategic infrastructure in accordance with the expectations of Policy SG1 of the SPLA DPD. • The name of the village 'Bailrigg Garden Village' is inaccurate and misleading and disrespectful. There needs to be public consultation on naming the garden village. • It would make sense for the whole garden village to reside in one parish. Such a governance review is technically a separate exercise but should be undertaken in conjunction with the Area Action Plan. • Consideration needs to be given to the relationship between the Area Action Plan and the Scotforth Neighbourhood Plan which has just begun its preparation. The Area Action Plan needs to provide clarity on the relative weight of its content and the implications between the two documents. • School provision in south Lancaster needs to be clarified at both primary and secondary level to ensure there are sufficient places locally and reduce the implications of excessive traffic movements on the local road network.

Table F: Table to summarise responses to Topic Paper 5: Water Management

9.3 Key Actions Arising

9.3.1 The weight attached to the **JTP Masterplan** has been raised as a concern. The principles are considered appropriate for the development of a garden village and will be considered in the

context of the policies within the Local Plan, national policies and guidance which form the primary and overarching starting point for development of the Area Action Plan.

- 9.3.2 Various **additional evidence documents** have been mentioned. The council is in discussion with stakeholders such as the education authority and health providers to gather evidence and determine the requirements. Work is also being carried out in relation to soils, agricultural land quality, renewable energy and heritage. Other matters raised will be considered. Evidence will be published once it is available.
- 9.3.3 The **Growth Catalyst and funding** has been highlighted. The council is seeking to understand the extent of the works anticipated by the County Council and the funding mechanism in the context of the Area Action Plan and S106 agreements. Further consideration will be given to infrastructure requirements, the priorities and their weighting in the context of stakeholder ambitions for the Broad Location for Growth.
- 9.3.4 It is recognised that the list of **infrastructure** will evolve as the preparation of evidence moves forward. The infrastructure and funding mechanisms require further consideration and viability assessment to ensure delivery of the appropriate infrastructure at the right time.
- 9.3.5 Consideration of **design** within the Area Action Plan is generally supported but there are conflicting opinions on how this should be dealt with. Some respondents wish to see detailed design coding and policies others recommend flexibility and highlight the importance of viability and infrastructure. It is recognised that engagement with a range of stakeholders will be key to ensuring design achieves the aims of national and local policy and guidance for garden villages and for the Broad Location for Growth.
- 9.3.6 A range of additional **stakeholders** have been suggested. Some of these stakeholders have already engaged in the process and others are on our consultation database. Further direct engagement will be carried out where appropriate.
- 9.3.7 Concern about **governance, management and maintenance** has been raised with conflicting views. The council will explore the options further and engage with stakeholders.
- 9.3.8 Ensuring that the Area Action Plan delivers **services, facilities and employment** is supported. There are conflicting views about the scale, type and how and where these should be delivered. Policies and guidance seek to ensure the area is as self-sufficient in terms of services, facilities, and employment as possible without attracting additional vehicle traffic. The council will consider whether further evidence is required and how to ensure delivery in a sustainable way.

9.3.9 Ensuring the provision of a **mix of homes and affordable housing** to meet identified need and create a sustainable is supported. Concern has been raised about the age of the SHMA and changes in circumstances since it was provided. The SHMA provides evidence for the plan period and as such is considered an appropriate starting point. Further work will be carried out in relation to specific specialist housing need and how this should be met through the Area Action Plan. The identified mix will be considered in context of viability evidence.

10. Next Steps and Progressing the Area Action Plan DPD

- 10.1.1 Engagement on the Topic Papers has provided a wide range of responses which will be important to the preparation and drafting of an Area Action Plan. Moving forward the Council will be seeking to engage with the stakeholders who submitted responses to the engagement process to explore some of the issues raised.
- 10.1.2 The Council will now seek through the course of 2023 to move forward with the preparation of a draft Lancaster South Area Action Plan, which will be published for formal consultation under Regulation 18 of the Town and Country (Local Planning) (England) Regulations 2012. The draft Action Plan will, for the first time, set out further detail and a planning framework for future development in the South Lancaster area, including specific policy direction on a range of matters and, importantly, allocations for both development and non-development purposes.
- 10.1.3 Consultation on the draft Action Plan will mark a significant stage in the preparation of the planning process and the draft content of the Plan will be subject to full public consultation to all interested parties. Further detail on that consultation process and how interested parties can get involved will be published in due course by the Council's Planning Policy webpages.
- 10.1.4 Beyond consultation on the draft Plan, there remain a number of stages in the plan's preparation. The Council must publish a final version of the Action Plan for consultation before submitting all documentation to Government where it will be examined by an Independent Inspector who will consider its content and direction and come to a decision on whether the Plan be formally adopted by the Council for planning purposes. It is anticipated that this process will be ongoing throughout the course of 2024.

11. Appendix A: Summary of Responses Made to the Topic Papers

1. All responses made in respondent order
2. Responses in Topic Order

APPENDIX A: LANCASTER SOUTH AREA ACTION PLAN - SUMMARY OF ALL RESPONSE TO TOPIC PAPERS (RESPONDER ORDER) - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-001-001	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.00	<p>Overarching observation that the Topic Papers do not contain any detail on the location phasing, funding or delivery of infrastructure and are very light on information in relation to the function and scope of the South Lancaster Growth Catalyst (SLGC). This detail is essential to ensure deliverable of the plans for South Lancaster. The SLGC reflects an agreement between the City and County Council's for the prioritisation, funding and development of both local and strategic infrastructure required to facilitate growth.</p> <p>Policy SG3 of the Local Plan makes clear that the forthcoming DPD for South Lancaster will address matters relating to financing and delivery, the phasing of new infrastructure and its specific location. It is therefore assumed that the detail on these matters will follow in the Implementation Strategy referred to in Topic Papers 1, 2 and 6.</p> <p>In view of the number and significance of planning applications in South Lancaster which are currently submitted for approval (or could come forward in advance of the Action Plan) it is imperative that urgent consideration is given to an interim strategy to ensure a fair and consistent approach to such applications. In particular making sure that fair and proportionate contributions are made to the delivery of strategic infrastructure in accordance with the expectations of Policies SG1 and SG3.</p>
TP-001-002	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.01	<p>The following strategies are missing from the core evidence base - a developer contributions / planning obligations strategy, landowner collaboration strategy and clarity on infrastructure priorities.</p> <p>These are key components of the implementation strategy to ensure the plan is deliverable. The County Council invite a separate topic paper on the implementation strategy where these issues may be addressed in more detail.</p> <p>In addition, the County Council consider that an Implementation Strategy should be preceded by an interim Implementation Strategy which sets out the planning authorities position in relation to determining early applications. This is to ensure that development contributes fairly and proportionately towards strategic infrastructure.</p>
TP-001-003	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.02	<p>There is sufficient analysis at this stage of what it means for the necessary and appropriate infrastructure to be delivered in the right place and at the right time. The County Council request that the Action Plan expressly acknowledges the need for a co-ordinated, fair and consistent approach to strategic infrastructure funding and delivery and includes a preference against piecemeal delivery as per Policy SG3 of the adopted Local Plan.</p>
TP-001-004	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.03	<p>Policy SG1 needs to be read alongside Policy SG3 and the core objectives of the Local Plan and there should be a focus on the delivery of strategic infrastructure. At paragraphs 7.4.4 the planning authority articulates its intention to consider planning applications in a fair and equal manner. The County Council welcome this intention but considers this should not be read in abstraction of the second limb of Policy SG3 which seeks to prevent piecemeal development coming forward in advance of the Action Plan.</p>
TP-001-005	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.04	<p>Whilst this is ultimately a decision for the planning authority, the County Council agree with the benefits of future proofing the plan as highlighted in para 6.4.3. If the Action Plan is predicated on Approach A then the development plan policy should clearly acknowledge the possibility of future growth beyond the Action Plan area. In addition, any such policy should make clear that development outside of the Action Plan area may need to contribute towards the delivery of strategic infrastructure whether or not such infrastructure has already been delivered by the time such development comes forward.</p>
TP-001-005	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.05	<p>The County Council acknowledges the rationale behind Approach B which follows national guidance on this matter.</p> <p>Nevertheless, given the strategic infrastructure needs of South Lancaster the forthcoming development plan policy should clearly signpost the likelihood of and need to plan for longer term infrastructure need, in line with Approach C.</p> <p>To this end, the policy should make clear that future development outside the plan period may need to contribute towards strategic infrastructure, even where it has been forward funded and delivered earlier in the plan period.</p>
TP-001-006	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.06	<p>The 3,500 figure in Policy SG1 is only a starting point for assessing the quantum of development in South Lancaster. This figure needs to be critically evaluated in view of the work undertaken for South Lancaster Growth Catalyst to secure the funding necessary for strategic infrastructure. This is vitally important to ensure the deliverability of the infrastructure identified in Policy SG3 and consequently the sustainable implementation of the Development Plan.</p>
TP-001-007	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.07	<p>No. The County Council considers that further evidence is required to dismiss Approach A as the preferred way of securing the optimum quantity and mix of development within the Action Plan area. The County Council considers Approach A is more likely to facilitate an optimum quantum of development that ensures that densities are maximised in the appropriate locations as well as to realise the benefits of place-making and sustainability of services. The County Council is concerned that Approach B is not proactive enough in optimising development opportunities. Furthermore, the County Council are not persuaded that Approach A would compromise the objectives of Approach C (the creation of GBI). This is because Approach A would be subject to the same development constraints, such as topography.</p>
TP-001-007	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.08	<p>The City Council's starting point for considering the mix of development densities is lacking in detail so it is difficult to come to a firm decision on this matter. However, the County Council strongly agrees that the decisions on the type of development proposed will be informed through discussions with key stakeholders. The County Council would like to underscore its role as such a stakeholder in its capacity as highway, flood and education authority.</p>
TP-001-008	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.09	<p>The County Council are broadly aligned with the approach set out in the Economic Prosperity Strategy but requests that employment land uses are approached flexibly so they are adaptable to changing economic market conditions. In addition, the County Council requests that consideration of the location and type of development uses addresses the wider supporting infrastructure need and is carefully integrated with the wider transport analysis. Crucially, the Action Plan should ensure that any employment allocations make a fair and proportionate contribution to strategic infrastructure delivery.</p>
TP-001-009	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.10	<p>As with employment uses, the County Council request that consideration of the location and type of a local centre remains firmly focused on the supporting infrastructure needs and is carefully integrated into the wider transport analysis. Development of a local centre may also need to contribute fairly and proportionately to strategic infrastructure delivery.</p>
TP-001-010	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.11	<p>The County Council consider that more case studies should be considered to evaluate the relative costs and benefits to Approach A and Approach B. The County Council have some concerns around the rigid adherence to defined development boundaries in terms of stifling innovation and artificially confining growth that may be capable of being managed through a more flexible, criteria-based approach. The County Council would like more information on the proposed areas of separation so these can be analysed against housing delivery expectations.</p>
TP-001-011	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.12	<p>Yes. The County Council considers that development opportunities outside the Action Plan area should be considered in the context of the South Lancaster Growth Catalyst. The forthcoming development plan should make clear that development outside of the Action Plan area, but benefiting from strategic infrastructure, should make fair and proportionate contributions towards it. The possibility of forward funding delivery of such infrastructure should be expressly acknowledged in the policy and recovery via developer contributions should be facilitated, irrespective of when development comes forward.</p>
TP-001-012	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.13	<p>Yes. The County Council agrees that a phasing plan is a critical component of the Action Plan. The County Council would wish to underscore it is a key stakeholder in the discussions around highway matters, flood and education. The phasing plan will need to be developed with a view to the content of the South Lancaster Growth Catalyst. The phasing plan will be crucial in informing the City Council's approach to Section 106 obligations and the role of any framework agreement required with developers.</p>

APPENDIX A: LANCASTER SOUTH AREA ACTION PLAN - SUMMARY OF ALL RESPONSE TO TOPIC PAPERS (RESPONDER ORDER) - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-001-013	Marcus Hudson	Lancashire County Council	Topic Paper 2	T2.02	The Transport Strategy needs to be developed in tandem with the landowner collaboration strategy and strategy for setting and collecting developer contributions in respect of strategic infrastructure. The cross linkages to the implementation plan need to be made clearer.
TP-001-014	Marcus Hudson	Lancashire County Council	Topic Paper 2	T2.03	<p>The work on the 2016 Highways and Transport Masterplan has been updated and refined in connection with the South Lancaster Growth Catalyst. This Topic Paper fails to acknowledge this evolution in the evidence base and strategic direction in transport planning, including the need to future proof strategic transport needs beyond the plan period.</p> <p>In particular there needs to be a shared understanding between the City and County Council around cumulative transport impacts and the way in which strategic infrastructure is funded and delivered. It is important that the Action Plan recognises, as per Policy SG3, piecemeal development is usually inappropriate.</p>
TP-001-015	Marcus Hudson	Lancashire County Council	Topic Paper 2	T2.05	The priorities to infrastructure funding and delivery should be made clearer having regard to work around the South Lancaster Growth Catalyst.
TP-001-016	Marcus Hudson	Lancashire County Council	Topic Paper 2	T2.14	This Topic Paper fails fundamentally to address issues around the funding and delivery of strategic transport infrastructure. The County Council refer to the City Council's role in the South Lancaster Growth Catalyst.
TP-001-017	Marcus Hudson	Lancashire County Council	Topic Paper 6	T6.01	Contrary to the summary at 2.3.2, the South Lancaster Growth Catalyst is not only seeking to address the delivery of a new road and transport infrastructure in South Lancaster, it is also a funding / delivery modal for local infrastructure.
TP-001-018	Marcus Hudson	Lancashire County Council	Topic Paper 6	T6.02	The County Council support the garden village principles and notes these will need to be respected to comply with the Governments terms of the HIF grant.
TP-001-019	Marcus Hudson	Lancashire County Council	Topic Paper 6	T6.03	The County Council agree that the issues of design should be considered in the Action Plan but should be counterbalanced against other considerations such as infrastructure delivery priorities and viability.
TP-001-020	Marcus Hudson	Lancashire County Council	Topic Paper 6	T6.04	The County Council's view is that the JTP Masterplan is only the starting point as it is a principally landscape-led concept document which is not underpinned by evidence on deliverability or viability.
TP-001-021	Marcus Hudson	Lancashire County Council	Topic Paper 6	T6.07	The infrastructure list needs to reflect the priorities established in the funding model for strategic infrastructure and broader commitment made in relation to the South Lancaster Growth Catalyst. The requirements of CIL Regulation 122 summarised in para 5.1.2 should be linked to a clear developer contributions strategy which accommodates early delivery of certain strategic infrastructure and recovery via developer contributions. The analysis at para 5.1.3 needs to be couched in an understanding of why piecemeal development is inappropriate and the need to future proof development beyond the plan period.
TP-001-022	Marcus Hudson	Lancashire County Council	Topic Paper 6	T6.09	The Action Plan should set out a clear approach to developer contributions which ensures that they are collected on a fair, proportionate and consistent basis from all benefitting development, irrespective of when that development comes forward. For the avoidance of doubt, this approach needs to be sufficiently flexible to facilities the recovery of forward funded elements of strategic infrastructure. The approach to infrastructure priorities need to have regard to the Council's role in the South Lancaster Growth Catalyst.
TP-001-023	Marcus Hudson	Lancashire County Council	Topic Paper 6	T6.10	In response to para 5.7.2, the County Council (in capacity as education authority) is reviewing its methodology for calculating and collecting education contributions and its finalised approach needs to be integrated with the wider developer contributions and implementation strategies. The County Council are review the proposals for school locations as identified by the JTP Masterplan and reserves its position to respond in due course.
TP-001-024	Marcus Hudson	Lancashire County Council	Topic Paper 6	T6.11	The JTP Masterplan is a design concept document that needs to be reviewed against evidence on viability and supporting infrastructure.
TP-001-025	Marcus Hudson	Lancashire County Council	Topic Paper 6	T6.15	The Local Plan threshold for affordable housing needs to be viability tested against all supporting infrastructure needs as part of the Action Plan preparation process. This should be a confirmed part of the viability assessment brief with external consultants.
TP-002-001	Matthew Symons	Hollins Strategic Land	Topic Paper 1	T1.01	HSL is satisfied that the evidence base set out in the Topic Paper is sufficient and proportionate.
TP-002-0016	Matthew Symons	Hollins Strategic Land	Topic Paper 4	T4.07	The Action Plan should seek to protect existing habitats wherever possible, enhancing biodiversity throughout. The Net Gain approach will require careful consideration and discussion with the development industry and landowners.
TP-002-002	Matthew Symons	Hollins Strategic Land	Topic Paper 1	T1.04	HSL acknowledges the Local Plan sets the broad location for growth and agrees this must be the primary focus. However, the Action Plan also represents an opportunity to look beyond the Garden Village as was done for the JTP Masterplan. The Action Plan could set a vision for how the Garden Village may expand in the future, reflective of national planning guidance which encourages planning authorities to set a vision of at least 30 years into the future where new settlements are proposed. It is important that the progress of the Action Plan is not hampered by extending the geographic scope, however the Action Plan could include a broad vision over how the Garden Village could evolve over many decades.
TP-002-003	Matthew Symons	Hollins Strategic Land	Topic Paper 1	T1.05	HSL considers the timescales described to be reasonable but would welcome a plan period that extends to at least 30 years to allow for the potential expansion of BGV.
TP-002-004	Matthew Symons	Hollins Strategic Land	Topic Paper 1	T1.08	HSL agrees that the garden village must deliver the type of housing that is needed in South Lancaster, HSL has met with the Council to discuss opportunities for community-led housing and is open to considering the delivery of self-build homes and homes for older people wihtin their land interests in South Lancaster.
TP-002-005	Matthew Symons	Hollins Strategic Land	Topic Paper 1	T1.09	HSL agrees that in order to achieve a sustainable community, residents must have access to employment opportunities, however it is importsnt that this is the right type of employment which align with the principles of delivering a garden village. Heavy industrial and warehouse development would not achieve the objectives of the garden village and the Council should be flexible in terms of the employment offer it provides, including the opportunities for home working. HSL is not adverse to considering employment uses within their land interests, including the siting of a local centre.
TP-002-006	Matthew Symons	Hollins Strategic Land	Topic Paper 1	T1.10	It must be acknowledged that the likely phasing of the garden village will be from the eat and west simultaneously. It is likely that a local centre will be delivered in the latter stages of development when the necessary footfall is in place. HSL would consider the provision of small centre within their land interests as part of early delivery of community facilities in South Lancaster
TP-002-007	Matthew Symons	Hollins Strategic Land	Topic Paper 1	T1.11	HSL would support the creation of an Area of Separation north of their land interests, the JTP masterplan recognised that this could be formed by preventing built development north of Carr Lane which would provide a significant area which would ensure HSLs land interests were viewed as a separate entity to the urban extents of Lancaster.
TP-002-008	Matthew Symons	Hollins Strategic Land	Topic Paper 1	T1.13	<p>A phasing plan is important to the delivery of the garden village. It must set out the housing elements which will be delivered during the plan period and has to be informed by a logical plan for the delivery of housing which secures the much needed homes as quickly as possible. The delivery of the garden village is entirety reliant upon the delivery of the required highways infrastructure which are key components which must inform phasing.</p> <p>The Council cannot afford to deliver the garden village from the centre outwards, with the central element unlikely to be delivered until the back end of the construction period. This would cause significant delays to housing delivery. Rather, the Council should follow the phasing of the road infrastructure, development should commence from the land in HSL interests to the west and simultaneously to the east.</p>
TP-002-009	Matthew Symons	Hollins Strategic Land	Topic Paper 2	T2.00	The development of land in the interest of HSL could provide the opportunity for commercially viable bus services to run along Ashton Road.

APPENDIX A: LANCASTER SOUTH AREA ACTION PLAN - SUMMARY OF ALL RESPONSE TO TOPIC PAPERS (RESPONDER ORDER) - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-002-010	Matthew Symons	Hollins Strategic Land	Topic Paper 2	T2.00	HSL would welcome the opportunity to discuss opportunities around the delivery of cycle routes and cycle hubs on land within HSLs interest. This may connect well to any proposed local centre within this location.
TP-002-011	Matthew Symons	Hollins Strategic Land	Topic Paper 2	T2.00	HSL recognise the potenital PROW links within the locality which could provide wider links across the Action Plan area and across towards the Lune Estuary.
TP-002-012	Matthew Symons	Hollins Strategic Land	Topic Paper 2	T2.12	HSL would support the investigation of opportunities for modal shift. The garden village has the potential to be a sustainable community that is not overly reliant upon private forms of transport. More detailed design is required to achieve modal shift should be considered at a reserved matters stage across the garden village.
TP-002-013	Matthew Symons	Hollins Strategic Land	Topic Paper 4	T4.02	The JTP masterplanning work sought to consider heritage assets in the garden village area. HSL has previously proposed a small local centre which would be linked by pedestrians via the existing canal bridge at Carr Lane.
TP-002-014	Matthew Symons	Hollins Strategic Land	Topic Paper 4	T4.03	HSL agrees that the landscape-led approach is required for development within the garden village and that the 8 principles identified represent a logical starting point. Design principle 3 seeks to retain visual separation and landscape buffers to existing development within the garden village. It is important that principle 3 recognises that there may be exceptions to the hard rule that there must be landscape buffers to existing properties. Design principle 4 seeks to create a green halo within the garden village. HSL agrees that this would represent an attractive and beneficial feature but, as with design principle 3, it must be considered to be a starting point. The precise route of the green halo will require careful consideration, taking account of existing landscaping features, potential POS areas and developable areas within land in HSLs interests.
TP-002-015	Matthew Symons	Hollins Strategic Land	Topic Paper 4	T4.06	It is considered that a bespoke approach to identifying areas of local landscape value may be required. However, given the likelihood that each parce within the garden village will be informed by a detaled masterplanning process it may not be necessary.
TP-002-017	Matthew Symons	Hollins Strategic Land	Topic Paper 5	T5.08	HSL support the broad objectives set out in the Topic Paper and recognises the Council has aspirations to utilise the garden village to reduce flood risk downstream. HSL are aware of the flood issues which affect Galgate to the South due to having development schemes in that area. The Action Plan could adopt similar approaches where land within FZ2 and FZ3 could be used for flood storage. This could acheive flood risk betterment downstream to the benefit of nearby communities.
TP-002-018	Matthew Symons	Hollins Strategic Land	Topic Paper 6	T6.03	HSL agrees that design is key to the success of the garden village and should be considered in the Action Plan. The Plan should provide clear and concise direction on the design of new development which is then demonstrated via parcel-specific masterplans. Masterplans can follow a similar process to strategic sites identified in the Local Plan - an outline planning application could be approved and then followed up by a supplementary masterplan at a reserved matters stage. This would allow the Action Plan to make swifter progress to adoption, without being weighed down by overly-perscriptive policy on design.
TP-002-019	Matthew Symons	Hollins Strategic Land	Topic Paper 6	T6.09	Given its involvement with sites elsewhere, HSL are well aware of the delays being caused by infrastructure planning. It is therefore vital that all infrastructure providers fully engage in the with the Action Plan process. All healthcare, education, community facilities, POS, transport, utility requirements should be set out in detail within the Action Plan. That would enable the Council to approve applications for development within the garden village immediately after the adoption of the Action Plan.
TP-002-020	Matthew Symons	Hollins Strategic Land	Topic Paper 6	T6.09	HSL recognises that community stewardship of land is a garden village principle which must be fully considered in the Action Plan. HSL considers it is possible that a hybrid approach to management could be taken into account - for example areas of POS within a specific development parcel could be managed by a private management company whereas the larger swathes of amenity space could be managed by a charitable trust. The Action Plan should provide direction on the management of public spaces to enable planning approvals to follow quickly after the adoption of the plan.
TP-002-021	Matthew Symons	Hollins Strategic Land	Topic Paper 6	T6.13	HSL agrees that the Council has an opporutnity to deliver employment in the right form via the Action Plan. Furthermore, HSL consider there to be potential for employment development to be delivered as part of their land interests. The garden village is likely to offer an attractive environemnt for office-type development.
TP-002-022	Matthew Symons	Hollins Strategic Land	Topic Paper 6	T6.14	HSL agree that this is an appropriate starting point provided it is supported by a Housing Strategy.
TP-002-023	Matthew Symons	Hollins Strategic Land	Topic Paper 6	T6.15	HSL are aware of the significant need for affordable housing in Lancaster, however viability will be key to the delivery of 30% affordable housing. Development at the garden village will require significant infrastructure and it is expected that developers will be aksed to make significant contributions via S106 agreements. The expected contributions must be consulted upon, alongside a detailed Viability Assessment.
TP-002-024	Matthew Symons	Hollins Strategic Land	Topic Paper 6	T6.17	HSL agree that a local centre will be required as part of the garden village, however it also recognises the potential for a smaller centre to be provided west of Lancaster Canal. The Topic Paper refers to the potential triggers for the delivery of a new local centre, including the creation of new road infrastructure and footfall. It is considered that a small local centre on HSL land interests could provide a complimentary centre to the main local centre which will meet needs in the early phases of development.
TP-003-001		Bailrigg Village Residents Association	Topic Paper 1	T1.07	We note that there will be a Partial Review of the Action Plan in light of the Cimate Emergency but that strategic questions of housing density will not be addressed. Surely this lack of focus will reduce the value of any review, which should also be looking at the effects of the cost of living crisis.
TP-003-002		Bailrigg Village Residents Association	Topic Paper 1	T1.08	Data from the 2021 Census shows that the area has an ageing population with the number of over-65s increasing from 18.3% in 2011 to 20.5% and the housing mix should reflect this both in terms of housing and transport.
TP-003-003		Bailrigg Village Residents Association	Topic Paper 2	T2.03	We agree that the re-configuration of Junction 33 would relieve congestion at the motorway exist and benefit those driving to the University. We agree that the provision of a by-pass round Galgate would be beneficial to relieve congestion and pollution in Galgate. However, just as critical is the need to relieve pressure further north along the A6, for instance Hala Junction and Pointer Roundabout. It is not clear there is funding for such improvements. Furthermore, the full impact of the COVID pandemic is not known so this could be an alternative starting point for addressing local highway improvements.
TP-003-004		Bailrigg Village Residents Association	Topic Paper 2	T2.05	Approach B should include regular and frequent bus links along the A6 consistently throughout the year and not just during term time. There should be improved bus links to the railway station with more space on the bus for bulky luggage.
TP-003-005		Bailrigg Village Residents Association	Topic Paper 2	T2.07	Provision for motorised scooter and wheelchair users is missing from these approaches. Upgrades of footpaths should be wide enough for walkers alongside wheelchairs and motorised scooters.
TP-003-006		Bailrigg Village Residents Association	Topic Paper 2	T2.09	We concur with comments in paragraph 8.5.3 regarding the importance of balancing ambitions for low carbon travel with the realities of the specific needs of individuals. We consider that Approach B is the better fit with these sentiments.
TP-003-007		Bailrigg Village Residents Association	Topic Paper 2	T2.14	If the Council is genuine in delivering a diverse mix ofhousing for a diverse mix of the population then the transport, travel and modal shift should reflect this, bearing in mind that an individuals needs can vary over time regardless of age. In terms of rail, it is disappointing that other locations for a possible site of a railway station have more been mentioned.
TP-003-008		Bailrigg Village Residents Association	Topic Paper 6	T6.02	We agree with the garden village principles set out, we consider points 1, 2 and 5 to be particularly valuable in the creation of a cohesive and sustainable community.
TP-003-009		Bailrigg Village Residents Association	Topic Paper 6	T6.03	We agree that issues of design should be considered in the Action Plan since the diverse mix of housing for a diverse community should include supported living which would need early stage design planning. Workshops to inform design matters would be beneficial. Likewise, design for multi-generational living and working from home coul be directed away from open plan interiors.

APPENDIX A: LANCASTER SOUTH AREA ACTION PLAN - SUMMARY OF ALL RESPONSE TO TOPIC PAPERS (RESPONDER ORDER) - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-003-010		Bailrigg Village Residents Association	Topic Paper 6	T6.04	We fell that the JTP Masterplan provides high-level principles.
TP-003-011		Bailrigg Village Residents Association	Topic Paper 6	T6.05	We agree that the National Design Guide provides a logical and robust startign point.
TP-003-012		Bailrigg Village Residents Association	Topic Paper 6	T6.16	We consider the housing mix should reflect a greater diversity and therefore should include more bungalows and support living housing. Co-housing for over 55s and multi-generational housing reflecting the social care crisis should also be included. Given the proximity to the university, it would be necessary to ensure that housing did not get bought up by buy-to-It landlords for student tenants. There must be some sort of mechanism in place to ensure the garden village does not become an extenion of the university campus as a student village.
TP-003-013		Bailrigg Village Residents Association	Topic Paper 6	T6.17	A local centre is integral to the success of the communy with healthcare facilities and a community hall and meeting space being important elements.
TP-003-014		Bailrigg Village Residents Association	Topic Paper 6	T6.18	A small convenience store would enhance the community hub.
TP-003-015		Bailrigg Village Residents Association	Topic Paper 6	T6.19	A small coffee shop could provide an additional meeting space for the community.
TP-003-016		Bailrigg Village Residents Association	Topic Paper 6	T6.20	The Residents Association want to emphasise its commitment to the Council's stated expectation that 'all development contained within the designation of the Broad Location for Growth, including the garden village, should contribute to infrastructure requirements in a fair and equal manner. The Council will not permit piecemeal development in this area which does not seek to address matters of strategic infrastructure in accordance with the expectations of Policy SG1 of the SPLA DPD'.
TP-004-001	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 1	T1.01	<p>The level of detail set out in Table 4.1 is welcomed and is considered to represent a suitable evidence base in the preparation of an Action Plan. There is a element of concern that a number of the documents listed in this table remain 'ongoing' and it will be important that this evidence base is completed before the Council seek to make any further progression with the Action Plan, evidence should not be used to backfill the Action Plan, rather it should inform it. It is also important that these documents are released to the public as part of a wider consultation exercise so they are subject to proper scrutiny.</p> <p>Additionally, the Action Plan should be accompanied by an appropriate masterplan, phasing plan and development framework. It is noted that the Council are reliant on a masterplan which does not align with the broad location for growth. This is considered to be a flaw in the evidence which supports the development of the AAP. For robustness, it is considered that a masterplan should be developed which is consistent with the Local Plan designation.</p> <p>Whilst the Council appear to accept the JTP Masterplan represents a starting point for the consideration of the AAP, it remains a point of concern that the Council are pressing ahead with the principles considered in the masteprlan without having the benefit of a full evidence base to inform their considerations.</p>
TP-004-002	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 1	T1.02	There is no objection to the vision set out in 5.1.1 but there are concerns around the extent to which the vision is biased towards the delivery of garden village. The garden village is clearly a significant aspect of the Action Plan but, as Policy SG1 indicates, it forms only one element of the wider broad location for growth. It is therefore recommended that the vision should be amended to strike a clear balance between the delivery of the garden village and the rest of the Action Plan area.
TP-004-003	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 1	T1.03	<p>There is no objection to the objectives identified for the Action Plan and consider these effectively capture the aims and objectives of SG1. To re-iterate it is important that the Action Plan deals with development across the whole designation, not just the garden village.</p> <p>The Council should seek to finalise and publish its evidence base to ensure that all options can be considered in forming a view of how these objectives can be met. Whilst the options prepared by JTP rpresent one option to how part of the growth area could be delivered, it is important that a number of options are considered and supported by appropriate evidence in justifying a preferred option.</p>
TP-004-004	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 1	T1.04	Our clients agree that the starting point in terms of geographical scope for the Action Plan should be the broad location for growth as identified by Policy SG1. It should not be the garden village area which does not align to the Local Plan.
TP-004-005	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 1	T1.05	Our clients agree with the Council's preferred approach (Approach B) in terms of the timescales for the Action Plan. It is important that this is consistent with national policy as well as recognising that the development of the Aftion Plan will facilitate a life span well beyond the Local Plan end date in the early 2030s. The Council may wish to consider an early review mechanism wiht the Action Plan to provide further flexibility for the Plan to adapt to future change.
TP-004-006	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 1	T1.06	Our clients agree that the provisionsof Local Plan Policy SG1 represent the starting point for calculating quantums of development in South Lancaster, noting that the figure is caveated by the words 'at least' recognising that 3,500 units is a minimum figure. It is also clear that this development is for the whole Action Plan area, not just the garden village, although it is accepted this will represent a significant proportion of the overall delivery. Should evidence suggest that further development can be accommodated then this should be considered by the Council to boost the supply of housing within the locality.
TP-004-007	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 1	T1.07	Our clients agree with the Council's intention to look towards striking a balance between high and low densities whilst also seeking to create a diverse mix of housing whilst also looking to opportunities to increase the provision for GBI. It is important that the conclusions that the Council reaches in terms of development densities are based on appropriate evidence which considers multiple options and development scenarios. The topic paper looks at the JTP Masterplan (which is not based on robust evidence) as a measuring stick of what could be achieved within the designaiton, without fully considering other options or the wider Action Plan area. The Council should start to consider the Action Plan area as a whole before discussing specific areas such as the garden village.
TP-004-008	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 1	T1.09	Our clients consider the provision of employment development should be consistent with that identified in Policy SG1 of the Local Plan. It is clear that whilst it is the primary purpose of the Action Plan to deliver new housing, there should also be an aspect of employment. Our clients have no specific comments on the nature of employment that should be considered but would suggest this should be based on market foactors with supporting evidence of market demand and need. The proximity of the univeristy and the desire to deliver the Health Innovation Campus could provide economic opportunities within the locality.
TP-004-010	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 1	T1.10	The garden village should clearly accommodate a significant proportion of the new population within the Action Plan area. However, at this stage there is no evidence to suggest thay it the most suitable location for a local centre to be provided and a wider masterplanning exercise for the whole Action Plan area would be encouraged in order to determine the most suitable location. This is particularly pertinent given the constraints within the 'Broad Location for Growth'.
TP-004-011	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 1	T1.11	<p>Our clients agree that any areas of separation should be defined within the Action Plan and this will provide clarity over development anticipated within the wider designation. The JTP Masterplan however does not provide the appropriate basis for the consideration of the area of separation, as asserted at paragraph 1.1.2 of the topic papers. The JTP masterplan is not consistent with the broad location for growth identified in Policy SG1 and although it may provide a basis for consideration of the garden village, it doesn't consider the wider area.</p> <p>In moving forward the Council to undertake a fresh masterplanning exercise, consistent with the area designation under Policy SG1.</p>
TP-004-012	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 1	T1.12	Our clients agree that the Action Plan should consider development opportunities for urban extensions and that this should be underpinned by a fresh masterplanning exercise that considers the whole SG1 area. This should consider multiple development options before stating a preferred option - all of which should be subject to public scrutiny.

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TP-004-013	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 1	T1.13	Our clients consider that the phasing of devlopement is an essential component in the delivery of growth. The issue of phasing requires a wider discussion with stakeholders, including landowners, developers and statutory bodies, to ensure that the area can develop in am appropriate and timely manner, as well as ensuring that infrastructure can be appropriately phased so that it does not place any undue financial burdens on the development industry, leading to delays. At this stage it is important that the Action Plan remains as flexible as possible in the respect of phasing to allow it to adapt to changing circumstances.
TP-004-014	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.01	<p>Our clients note that the most recent transport data dates back to 2019 and since that time there have been significant changes to travel movements brought about by the COVID Pandemic. As such, whilst the existing evidence base represents a good starting point it is essential that the evidence is updated to recent more current local needs. We would urge the Council to publish evidence on travel and transport as soon as possible to provide certainty over how future travel movements will be managed.</p> <p>Any such evidence should demonstrate the value and attractiveness of modal shift, having regard to the change in circumstances required to make that happen. It should consider how modal shift should integrate with the wider transport network. It is also important to understand how any other transport project(s) will be funded and this should be viability tested.</p>
TP-004-015	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.02	<p>Our clients welcome the level of evidence which has been identified in Table 3.1 and consider this combined to represent a suitable evidence base to prepare the Action Plan. There is a element of concern that a number of the documents listed in this table remain 'ongoing' and it will be important that this evidence base is completed before the Council seek to make any further progression with the Action Plan, evidence should not be used to backfill the Action Plan, rather it should inform it. It is also important that these documents are released to the public as part of a wider consultation exercise so they are subject to proper scrutiny.</p> <p>Additionally, the Action Plan should be accompanied by an appropriate masterplan, phasing plan and development framework. It is noted that the Council are reliant on a masterplan which does not align with the broad location for growth. This is considered to be a flaw in the evidence which supports the development of the AAP. For robustness, it is considered that a masterplan should be developed which is consistent with the Local Plan designation.</p>
TP-004-016	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.03	Our clients agree that the approach to focus on both the strategic and local network is necessary to develop an effective framework for the area. However, they would question how the significant road improvements detailed in the topic paper would align wiht the strategy of improving modal shift. Our clients note that much of these improvements would be funded through developer contributions, in line with nationally prescribed tests. Whilst there is no objection to this approach, it would have to go through the necessary viability testing. It is also important that these documents are released to the public as part of a wider consultation exercise so they are subject to proper scrutiny.
TP-004-017	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.04	Our clients support the visions and ambition of the BSIP and consider that, in general terms, provides sufficient scope between Lancaster City Centre and the 'Broad Location for Growth'. It is not clear whether its considerations consider simply the garden village or the wider designation as a whole. This is not considered to be a robust approach and not consistent with the local plan which should reflect the wider area identified in SG1. It is not considered appropriate for the Action Plan or supporting Transport Strategy to focus solely on the garden village.
TP-004-018	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.05	Our clients have no preferred approach in relation to public transport, although support the overarching ambition to promote and improve options for sustainable transport throughout the 'Broad Location for Growth'. It is important that any requirements for funding towards public transport to be provided by developments should meet the appropriate national tests and be viability tested.
TP-004-019	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.06	Our clients have no preferred approach in relation to cycling, although do support the provison of an integrated cycle network throughout the Action Plan area. Our clients remain concerned that the analysis is based around the JTP Masterplan of the garden village and does not reflect the wider area designated in Policy SG1. This is considered to be a flaw and needs to be revisit in order to deliver an effective and sound plan.
TP-004-020	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.07	Our clients have no preferred approach in relation to walking, although do support the provison of an integrated footpath network throughout the Action Plan area. Our clients remain concerned that the analysis is based around the JTP Masterplan of the garden village and does not reflect the wider area designated in Policy SG1. This is considered to be a flaw and needs to be revisit in order to deliver an effective and sound plan.
TP-004-021	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.08	Our client does not consider that the Council should pursue bespoke parking standards within the 'Broad Location for Growth'. It is considered that the standards should be consistent with the wider authority area and should not be different for different neighbourhoods. That said, consideration could be given to how vehicle parking is accommodated within the design of new development, for example the provision of cycle streets, which prioritise cyclists whilst acknowledging that residents will likely tobe reliant on private vehicles to some extent/
TP-004-022	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.09	Whilst parking standards should be retained to provide consistency within the Local Plan, there is no reason why alternative solutions to how parking can be incorporated into development should not be considered. However, these solutions would be need to be subject of public scrutiny and input from stakeholders. Whilst it may be possible for some options for car free development (in city centre locations or close to the university) this is not considered to be an appropriate approach within the 'Broad Location for Growth'. Further consideration could be given to improving infrastructure for electric vehicles.
TP-004-023	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.10	<p>Our client is content with the proposed definition for modal shift for the purposes of the AAP. However, they would suggest a minor change to the definiton in order to steer away from the use of fossil powered private vehicles (as opposed to a shift away from private vehicles all together). [alternative wording is provided within the responders full response]</p> <p>Whilst our clients support the definition provided, it is considered to be somewhat unrealistic given the geographical location of the Action Plan area and Lancaster generally to anticipate a total shift away from private vehicles. Rather, the consider that support should be given to the promotion of electric vehicles as well as supporting an integrated sustainable transport and footpath network. Notwithstanding this, caution is urged around the sole advocacy of electric vehicles, noting that the market is young and remains untested. In addition, the Council should be mindful of the extensive infrastructure required to make the widespread use of electric vehicles a reality.</p>
TP-004-024	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.11	Our clients are supportive of the modal shift measures described in paragraph 9.2.3 of the topic paper but consider a great emphasis should be placed on the use of electric vehicles, although these cannot be relied on in isolation at this stage. It is important that any measures are backed up by appropriate evidence and, where they are reliant on developer contributions, supported by the necessary infrastructure testing.
TP-004-025	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.12	Our clients consider that the Council is right to investigate opportunities for modal shift in preparing the Action Plan, indeed the development of such a plan provides a unique opportunity to shape future development in order for it to act as a catalyst for sustainable development. It is important that any such measures are backed up with appropriate evidence and, where there is a reliance of developer contributions, these are accounted for as part of the viability testing. Whilst there is a desire for modal shift, this should not come at a cost which makes development unviable and prevents otherwise sustainable development coming forward.
TP-004-026	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.13	Our clients welcome the approach set out in paragraphs 9.5.4 and 9.5.5 of the topic paper and welcome that developers will be involved in the process and will have a say in the development strategy moving forward. It is right that the plan seeks to be amitious however it also must be realistic.
TP-004-027	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.01	<p>Our clients welcome the level of evidence which has been identified in Table 3.1 and consider this combined to represent a suitable evidence base to prepare the Action Plan. There is a element of concern that a number of the documents listed in this table remain 'ongoing' and it will be important that this evidence base is completed before the Council seek to make any further progression with the Action Plan, evidence should not be used to backfill the Action Plan, rather it should inform it. It is also important that these documents are released to the public as part of a wider consultation exercise so they are subject to proper scrutiny.</p> <p>Additionally, the Action Plan should be accompanied by an appropriate masterplan, phasing plan and development framework. It is noted that the Council are reliant on a masterplan which does not align with the broad location for growth. This is considered to be a flaw in the evidence which supports the development of the AAP. For robustness, it is considered that a masterplan should be developed which is consistent with the Local Plan designation.</p>

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Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-004-028	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.02	Our clients are supportive of the Council's climate ambitions and recognise the need to adapt to Climate Change and respond to the Council's Climate Emergency Declaration. Notwithstanding this, energy standards are derived from national building regulations and as a result it is not necessary for these to be repeated in the Action Plan. This being the case, our client supports Approach A to be the correct route for the Action Plan to take as this will ensure that the Action Plan does not set out higher energy standards than those prescribed by Building Regulations. This is not to say that the Council should not seek to promote higher standards (through incentives or other means) but that some not form part of planning policy.
TP-004-029	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.05	Our clients do not have a preferred approach to climate focussed design in new buildings. Notwithstanding this, they consider the Action Plan should be consistent with the Local Plan. Whilst specific areas of the Action Plan might look to pursue alternative approaches this should not be a requirement of the Action Plan as a whole.
TP-004-030	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.06	Our client is broadly supportive of the principles associated with carbon offsetting but would be cautious in relation to carbon offsetting funds without having the opportunity to review further details of this fund in order to understand the implications on viability. It is not clear at this stage the rate which would be expected, how this would be calculated or the projects it would relate to. These details would need to be factored into viability testing to ensure that development is not rendered unviable. Subject to the publication of information described, Approach B would be broadly supported where offsetting would be included in meeting net zero but would be secured through renewable energy and land sequestration projects.
TP-004-031	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.08	<p>Our client notes the Council's ambitions around taking account of embodied carbon within development but is concerned that the Council is considering an approach that would represent a significant deviation from the wider district under the Local Plan. Whilst embodied targets could be supported, this should be reflective of the entire district, not specific areas. It is also unclear how this ambition has been factored into the Council's viability testing.</p> <p>Our clients remain concerned around the reliance that the Council appears to place on the JTP Masterplan and how this appears to be the benchmark for the rest of the Action Plan area. This approach appears to be back-to-front and, in the interests of soundness, it is considered that the strategy should be applied to the area as a whole, not just the garden village.</p>
TP-004-032	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.12	Our clients have no objection to the proposed water resilience measures set out in Approach B but would urge the Council to consider the impact of additional requirements as part of the viability assessment.
TP-004-033	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.13	<p>Our clients consider that a degree of consistency with the adopted Local Plan will be important in considering construction practices and as such is supportive of Approach A. Differing approaches from one part of the district to the other could lead to inconsistency and overlap between construction differences and achieving vision / goals. This may result in land in South Lancaster providing infrastructure to foster modal shift but then does not align with standards outside the Action Plan area.</p> <p>For the avoidance of confusion, additional requirements for construction practices should be avoided. That is not to say that more sustainable approaches could not be delivered, but this should be at the discretion of the developer, based on site-specific considerations. The Council may wish to incentivise such an approach.</p>
TP-004-034	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.14	Whilst our clients support the Council's ambition for fossil fuel free development as a policy direction, they would question the need for this to be enshrined in Action Plan policy, owing to the national and local policy timescales. This is particularly the case in relation to emerging building regulations which will be in place before the Action Plan is likely adopted.
TP-004-035	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.16	<p>Our clients are generally supportive of the proposals for the LAEP and centralised energy network in the 'Broad Location for Growth'. However, very little information exists providing detail on how this will be managed and its implications on developers. Our clients would urge information on this to be published as soon as possible to provide certainty to all interested parties. This would align with approach B but, as mentioned, further clarity is required on this matter.</p> <p>Our clients also note that the topic paper, at paragraph 5.5.5 states that the LAEP is looking to secure net zero within the garden village. Whilst this is not disputed, clarity is sought to whether this will apply to the rest of the growth area. It is important that the Action Plan takes a consistent approach to the area as a whole.</p>
TP-004-036	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.17	Our clients do consider the LAEP represents a logical starting point, however require further clarity before confirming any support for the approach. As a further point of clarification, the topic paper refers to an Approach D which is not detailed. This is assumed to be a typographical error.
TP-004-037	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.18	Our clients do not have a preferred approach at this stage as there is insufficient information to make an informed assessment. However, if the Council were to pursue a heat network, clarity would be required on what this will entail and how it would be delivered. If the financial burden of delivering a heating network is to be placed on the development industry then this must be factored into the viability assessment.
TP-004-038	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.19	Our clients would agree that the approach options for the heat network represent a logical starting point for consideration and the Action Plan would represent a suitable vehicle for the implementation of such a policy should the evidence demonstrate the approach has a sound basis. However, further clarity is needed before any informed comments can be made on this matter.
TP-004-039	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.20	<p>The 'Harnessing Community Energy' project appears to be reliant on the degree of public appetite for such a scheme. The levels of public interest are not known at this time and this should be explored further before the Council seeks to allocate land for such a use as it may prove undeliverable.</p> <p>It is also not clear where the land for such a use will come from, it is assumed this will be Council land but this will need to be confirmed if the project is to advance. Equally, if the land is expected to come from the development industry (or financial contributions made to it) then this will need to be factored in the viability assessment to ensure deliverability and does not impact on the delivery of new homes.</p>
TP-004-040	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 4	T4.01	<p>Our clients welcome the level of evidence which has been identified in Table 3.1 and consider this combined to represent a suitable evidence base to prepare the Action Plan. It will be important that this evidence base is completed before the Council seek to make any further progression with the Action Plan, evidence should not be used to backfill the Action Plan, rather it should inform it. It is also important that these documents are released to the public as part of a wider consultation exercise so they are subject to proper scrutiny.</p> <p>There is a concern on the over reliance of the JTP Masterplan in the formulation of the topic papers as well as the emerging evidence base. If the focus is to remain on the JTP work then the supporting evidence will fail to address the needs of the wider growth area. Further clarity should be provided from the Council in regard to the status of the masterplan.</p>
TP-004-041	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 4	T4.02	<p>Our clients welcome the strategy detailed between paragraphs 4.2.1 and 4.2.7 of the topic paper in relation to the historic environment and consider this to present a robust basis for the development of the Action Plan. Our clients recognise that this matter is being considered for the whole 'Broad Location for Growth' rather than just the garden village but would note the inconsistency approach between this and other matters discussed in the topic papers.</p> <p>Notwithstanding this, our clients note the intention to use the Council's own Conservation Team to compile the heritage evidence base. Our clients would question, in the interests of robustness, whether it would be more pertinent for an independent assessment to be carried out. There may be instances where proposals for GBI conflict with heritage assets and, in such circumstances, it may be prudent for independent assessment to provide an objective assessment. Our clients consider this to be necessary in order for the Action Plan to be considered sound.</p>

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TP-004-042	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 4	T4.03	Our clients agree with, and are supportive of the principles detailed in the topic paper pertaining to the landscape-led approach. The principles in themselves are considered to be an appropriate starting point but, any approach needs to be applicable to the wider 'Broad Location' rather than the garden village area. Our client considers that, whilst the principles of the approach are considered sound, they should be focused on the wider growth area as a starting point which is then condensed into the various sub-areas, including the garden village. It is essential that, in the interests of soundness for the Action Plan, that the underpinning strategy and design principles relate to the whole Action Plan area.
TP-004-043	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 4	T4.04	Our clients do not seek to draw conclusions on what particular recommendations should be prioritised from the Landscape Sensitivity Assessment. This is question best answered by the Council. It is considered that the Action Plan should seek to strike the right balance between the policies and recommendations, noting it might not be possible to meet every single recommendation.
TP-004-044	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 4	T4.05	<p>Whilst noting that the green halo is something which relates solely to the garden village, our clients are broadly supportive of the concept when referring to sites of ecological interest (although it is not clear what planning policy status this would have or the mechanisms over how it would be achieved). The concept of a green halo appears to have evolved through the JTP Masterplanning work which seems to provide more of a landscape function as opposed to ecological function. If the Council continue to pursue such a feature, it must ensure that this is the correct approach for the Action Plan area as a whole, based on sound evidence, and not just retrofitted to the wider area from the JTP Masterplan.</p> <p>Our client does consider this concept should be something which is set as an ambition within the Action Plan, although clear evidence would need to demonstrate what its purpose would be and how it would be delivered. If the expectation that this feature is to be delivered by the development industry then this would need to be viability tested to ensure any requirements for a green halo are not overly onerous. It is also important to recognise that not all development parcels will be able to accommodate such landscaping feature and so there will need to be flexibility within any subsequent policies. The green halo concept can only be carried forward where it can be demonstrated that it would not undermine the aims and objectives of Policy SG1. Approach C is considered to be the most suitable at this time, clearly a green halo can be landscape led but it needn't be its sole purpose, it could have a number of functional roles which add to the sustainability of the wider area.</p>
TP-004-045	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 4	T4.06	Our clients are supportive of the approaches set out in the topic paper in relation to local landscape designations although they note that the Council to not explicitly state their preferred approach. Whilst the general principles are supported, it is important that the requirements are not overly onerous as to stifle development and the delivery of new homes. It is also important that the strategy of protecting landscapes does not conflict with wider delivery in the 'broad location for growth'.
TP-004-046	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 4	T4.07	<p>Of the two options identified by the Council at paragraph 4.8.17 it would, in the interests of soundness, appear prudent for the Council to identify and designate any key wildlife habitats for protection within the Action Plan. If a masterplan for the whole area were to be advanced then the identification of any key habitat areas would form a key component of the masterplan. It is important that the ecological evidence prepared as part of the AAP aligns with the 'Broad Location for Growth' and not just the garden village area.</p> <p>Notwithstanding this, it is apparent within the topic paper that the current strategy is heavily predicated on the JTP masterplan and is not considered to represent an appropriate basis for a wider Action Plan strategy. Whilst underlining principles may well be transferable, it is key that the starting point needs to be the whole SG1 area.</p>
TP-004-047	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 4	T4.08	<p>Our clients considered that in regards to biodiversity net gain (BNG) targets, the Action Plan should be consistent with national planning policy and set a reliance on the mandatory 10% target. Whilst the Action Plan could be worded to invite a higher percentage such as 'at least 10%' our clients consider the 10% figure should be used.</p> <p>If the Council were to advance an Action Plan which included higher targets, these would require extensive justification and would need to be underpinned by highly robust evidence.</p>
TP-004-048	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 4	T4.09	Our clients do not have a preferred option to the delivery of BNG at this stage. They would however urge the Council to ensure that whatever approach is taken that it is flexible and can allow for deviations on a site-specific basis.
TP-004-049	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 4	T4.11	Our clients do not have a preferred approach to the implementation of a GBI Strategy. They would however urge the Council to ensure that whatever approach is taken that the policy requirements are not overly onerous or restrictive. It should be clear how expectations will be delivered, when it is to be delivered and by who. This should also be factored into viability testing.
TP-004-050	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.01	<p>Our clients welcome the evidence identified by the Council from the water management perspective as well as recognising that the evidence used for the Local Plan is somewhat dated and requires update as part of the Action Plan process. It is noted that a large part of this evidence base is yet to be prepared and would therefore urge this is published as soon as possible.</p> <p>Our clients are somewhat concerned that the evidence seems to be heavily weighted towards the JTP masterplan area which is not consistent with the 'Broad Location for Growth' identified via Policy SG1. Therefore in the interests of soundness and robustness, evidence needs to be prepared in regard of the whole Action Plan area.</p>
TP-004-051	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.02	Our clients consider the sources of flooding identified by the Council at paragraph 5.1.1 represent an appropriate basis for the development of the Action Plan and its evidence base.
TP-004-052	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.03	<p>Our clients recognise the difficulties in obtaining such information. In order to counter this as best as possible, our clients would support provision in the Action Plan for site-specific drainage information to be required as part of planning applications.</p> <p>It is not considered realistic to expect that all unmapped watercourses / culverts or private systems to be mapped as part of the Action Plan process, but development proposals can play a role in provide information on a site-by-site basis that will, over time, catalogue information.</p>
TP-004-053	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.04	Our client considers that areas known to be at risk from flooding should be identified within the proposals map, drainage strategy and GBI Strategy, as they will clearly impact on the way that growth in the area develops over time. This should not necessarily be a barrier to all development and our clients would urge the Council to align itself with national planning policy in this respect, to allow for the sequential testing of sites to ensure that, if needed, sites can come forward for development in areas of risk, subject to certain conditions and based on the vulnerability of development. This approach most closely aligns with Approach B.
TP-004-054	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.05	<p>Our clients do not disagree with the approach (in general terms) as set out on page 98 of the JTP Masterplan, as it is right that discharge and run-off rates should not be increased as a result of development of a site. However our client remains concerned by the idea of using the masterplan as a 'starting point'.</p> <p>Our clients are somewhat concerned that the evidence seems to be heavily weighted towards the JTP masterplan area which is not consistent with the 'Broad Location for Growth' identified via Policy SG1. Therefore in the interests of soundness and robustness, evidence needs to be prepared in regard of the whole Action Plan area.</p>
TP-004-055	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.06	Our clients do not consider that there is a legitimate basis for requiring run-off rates post development to be lower than greenfield run-off rates. They are firmly of the view that greenfield rates should be the benchmark which development proposals are assessed against in terms of surface water drainage and surface run-off.

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Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-004-056	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.07	<p>Our clients position in this regard more closely aligns to Approach D as they consider that regard should be had for national guidance for attenuation rates and peak surface water discharge rates but the requirement for such need not be stipulated within planning policy. This is partly because the matter is dealt with under separate legislation and also because a policy could be overly prescriptive.</p> <p>Whilst development proposals will clearly have to have regard to national policy through their detailed design, it is not considered necessary to have specific policies in the Action Plan which prescribe attenuation and discharge rates. Should the Council be minded to advance this issue, it could be provided within a Supplementary Planning Document (SPD) to act as guidance on matters of drainage.</p>
TP-004-057	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.08	<p>Our client does not object to the concept of identifying broad locations for flood alleviation and/or mitigation as part of the Action Plan, although this would clearly need to form part of a masterplanning exercise for the whole 'Broad Location for Growth'. It is true that the nature of any alleviation / mitigation measures would be dependent on the form of development proposal which could only be determined on a site-by-site basis.</p>
TP-004-058	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.09	<p>Our clients do not disagree with the strategic water management principles identified within the JTP Masterplans, noting that these are somewhat generic in nature. There are concerns over the reliance on the JTP Masterplan as the starting point for consideration on these matters. This is considered to be unsound and the Council should reconsider its strategy to be based on the whole 'Broad Location for Growth' without relying on a strategy which has been subject to little scrutiny and has only been developed for one part of the Action Plan area as a whole.</p>
TP-004-059	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.10	<p>Whilst multi-functional sustainable drainage systems is commonplace as part of modern development, it is not considered to be relevant to the Action Plan to stipulate that these are required within development proposals. Rather, it is considered that the Action Plan should advocate SuDS in more general terms to allow flexibility in approach and allow for the best solution on a site specific basis. Providing specific requirements for all development proposals is considered to be too onerous.</p>
TP-004-060	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.11	<p>Our client agrees that Approach B is the most appropriate approach to pursue at this stage but agrees that additional evidence is required to support any deviation in approach. Our client is not opposed to the introduction of multi functional drainage systems but considers that any requirement should be underpinned by robust evidence. Any specific requirements however are considered to be too onerous.</p>
TP-004-061	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.12	<p>Our clients do not wish to provide comments on what specific elements of SuDS components should be prioritised, however would re-iterate the importance that any approach will need to be flexible.</p>
TP-004-062	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.13	<p>Whilst technical guidance could be a helpful tool for inclusion within the drainage strategy, we would urge caution when considering its insertion into development plan as technical guidance may be updated, which could lead to a strategy quickly being out of date. That being the case we consider it would be prudent to refer to national guidance generically to ensure the approach remains up-to-date.</p>
TP-004-063	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.14	<p>We agree that Approach B, which sets out the list of drainage components within the drainage strategy as guidance, but not including them within policy is the best option moving forward.</p>
TP-004-064	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.15	<p>Our clients are amenable to the concept of SuDS approval body (SAB) noting that this would provide a mechanism for the LLFA to approve, adopt and maintain SuDS features to more than one property, but feel that further exploration is required to understand what is involved and what it would mean in terms of technical requirements. Notwithstanding this, Approach B is also a reasonable approach which seeks to maintain the current position and provide developers within flexibility.</p>
TP-004-065	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.01	<p>Our clients welcome the evidence identified by the Council from the water management perspective as well as recognising that the evidence used for the Local Plan is somewhat dated and requires update as part of the Action Plan process. It is noted that a large part of this evidence base is yet to be prepared and would therefore urge this is published as soon as possible.</p> <p>Our clients are somewhat concerned that the evidence seems to be heavily weighted towards the JTP masterplan area which is not consistent with the 'Broad Location for Growth' identified via Policy SG1. Therefore in the interests of soundness and robustness, evidence needs to be prepared in regard of the whole Action Plan area.</p>
TP-004-066	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.02	<p>Our clients broadly support the principles which underpin the garden village aspirations noting that, in general terms, they form an appropriate basis for setting out the aspirations of any medium / large residential development. They could therefore be seen as an appropriate basis for wider development across the entire Action Plan area. That said the Council not lean too heavily on work which has been undertaken as part of garden village and instead should look to create a set of guiding principles for the 'Broad Location of Growth' as a whole.</p>
TP-004-067	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.03	<p>Our clients agree that design should be considered as part of the formulation of the Action Plan but that, as a subjective matter, any design related strategy should be the culmination of effective, pragmatic and constructive engagement. This should include the local community, neighbourhood groups, design experts and members of the development industry. There may be conflicting aims within these groups and so early engagement will be essential in developing a design strategy. Workshops can present a valuable tool in achieving meaningful stakeholder engagement but the Council should also consider seminars, leaflet drops and websites.</p>
TP-004-068	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.04	<p>The principles incorporated in the JTP Masterplan are acceptable to an extent but are not considered an appropriate response to the wider characteristics of the whole Action Plan area. Our clients are not supportive of the Council's approach to retrofit the JTP masterplan into the wider area. There is no evidence currently available to support this approach nor is there any information of other options which have been considered by the Council and the justification for why any such options are not favourable. This is not considered to be a sound basis upon which to develop the AAP.</p>
TP-004-069	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.05	<p>Our clients consider that the National Design Guide provides a logical and robust starting point in the development of the Action Plan. However, this only provides a general approach that is applicable across the Country so it is essential that local characteristics are considered. This should form the basis of the masterplanning exercise for the whole Action Plan area.</p>
TP-004-070	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.06	<p>There is no evidence currently available to support this approach nor is there any information of other options which have been considered by the Council and the justification for why any such options are not favourable. This is not considered to be a sound basis upon which to develop the AAP. That said, when applied in tandem with the National Design Code this may provide an appropriate framework for the Action Plan area as a whole.</p> <p>Notwithstanding this, our client does support the flexible approach that is indicated in the application of design code requirements. They consider that development within the Action Plan area should not be subject to the rigid application of the design code, but allowed a degree of flexibility to enable development proposals which respond to site-specific characteristics and other matters such as financial viability.</p>
TP-004-071	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.07	<p>Our clients would urge the Council to ensure that any infrastructure provision is factored into the viability assessment, noting this is currently unavailable. It is also critical to understand how this infrastructure is funded and delivered. If it is the case that the burden of its delivery is to be placed on the development industry, then viability evidence should be provided.</p>
TP-004-072	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.08	<p>Our clients are generally supportive of infrastructure providers set out in Table 5.2 but feel that it would be important for key stakeholders inside the City Council to be mentioned. Additionally, it is considered that Network Rail be added to the list if infrastructure providers given the proximity of the West Coast Mainline. Our clients also question whether representatives from the development industry should be included (such as the Home Builders Federation), particularly in the context of the financial burdens of delivering infrastructure which may rest with them.</p>
TP-004-073	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.09	<p>Our clients have no other views on this other than to state that the City Council should not be overly reliant on the JTP Masterplan in its assessment of infrastructure requirements and that any such infrastructure should be accounted for in the viability assessment.</p>

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TP-004-074	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.10	Our clients do not consider there to be sufficient information at this time to provide an informed position on what the best approach would be to the management of places and spaces. It is important that any future approach should be flexible and offer a degree of choice for developers and the Council alike. Our clients would also comment that however the Council seek to use management companies would need to provide substantive evidence to justify any approach where the use of management companies were not be deemed acceptable.
TP-004-075	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.11	Our clients consider the principles of the economic prosperity detailed in the JTP Masterplan are equally important for the Action Plan area as a whole. It is considered more prudent to align the principles of economic prosperity with the principles set out in Policy SG1 of the Local Plan.
TP-004-076	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.12	Our clients focus on the delivery of new homes and so do not have any substantive comments to make on this question at the present time. Notwithstanding this, the sectors suggested appear to be wide ranging and would appear to be appropriate targets for South Lancaster (albeit capacity would need to be considered). The Action Plan should consider a number of options for how these sectors would be targeted which is supported by an appropriate evidence base.
TP-004-077	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.14	The Local Plan is considered an appropriate starting point for understanding the required housing mix for the Action Plan area. That said, it is based on the SHMA which dates back to 2018 and the JTP Masterplan which has no planning status. Whilst the Local Plan and SHMA should provide a starting point, our clients consider that it would be prudent to prepare an update to the SHMA to ensure that the Action Plan delivers the homes that are needed.
TP-004-078	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.15	Our clients welcome the provision of affordable housing within the Action Plan area. They would suggest that any policy within the Plan should be sufficiently flexible as to be able to react to market conditions or site-specific viability considerations that mean sometimes it may not be possible to deliver 30% affordable housing.
TP-004-079	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.17	Whilst there is no national definition for a local centre, they are generally considered to include a range of small shops which are local in nature including a small supermarket, newsagent, post office, pharmacy and other services such as a hot food takeaway and laundrette. Local centres should be readily accessible to the population they serve and should be centrally located. That is not to say any centre, by default, be located in the garden village. This should be reflective of the patterns of growth in the locality.
TP-004-080	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.18	Any such provision of a new foodstore within the Action Plan area should be underpinned by appropriate retail evidence, with the current evidence not up-to-date. If evidence demonstrates a need, then the broad location for growth could represent a suitable location for this although it should be considered as part of a wider masterplanning process for the area as a whole. It would also be considered against the wider requirements of the Local Plan.
TP-005-001	Christopher Carroll	Sport England	Topic Paper 1	T1.01	The Playing Pitch Strategy will form a key part of the evidence base which should guide policies within the plan. It is strongly advised that the forthcoming strategy is a playing and outdoor sports strategy to ensure wide consideration is taken for the needs of all sports. The Council may also wish to consider the role of a Built Facilities Strategy however it is recommended this forms part of a district-wide strategy.
TP-005-002	Christopher Carroll	Sport England	Topic Paper 1	T1.02	In principle, Sport England are supportive of the vision as it broadly aligns with our objectives.
TP-005-003	Christopher Carroll	Sport England	Topic Paper 1	T1.03	In principle, Sport England are supportive of the objectives and how they will be delivered, particularly as sports and recreational opportunities are recognised as being key to delivering objectives 1 and 3 of the Plan. Sport England would welcome further clarification and consultation on the proposed relationship between any future development and any existing sports facilities to ensure that development accords with Sport England guidance.
TP-005-004	Christopher Carroll	Sport England	Topic Paper 1	T1.10	To promote activity and sustainability, Sport England are of the opinion that leisure facilities should be centrally positioned and easily accessible.
TP-005-005	Christopher Carroll	Sport England	Topic Paper 1	T1.13	Sport England are of the opinion that a phasing plan will be a critical component of the Action Plan, particularly as and when and where the necessary outdoor and indoor sporting facilities are to be delivered.
TP-005-006	Christopher Carroll	Sport England	Topic Paper 1	T1.14	It is unclear whether the Action Plan will include any site allocation for sporting facilities and if any education requirements will also have sporting facilities to support the wider community. It is essential that Lancashire County Council are involved in the preparation of the Playing Pitch and Outdoor Sports Strategy.
TP-005-007	Christopher Carroll	Sport England	Topic Paper 4	T4.01	It would be preferred if outdoor sports is considered separately from open space as they are two different typologies and are rightly being assessed separately.
TP-005-008	Christopher Carroll	Sport England	Topic Paper 4	T4.11	Sport England would not support the use of standards to secure sports pitches and other outdoor sports facilities.
TP-005-009	Christopher Carroll	Sport England	Topic Paper 6	T6.02	Sport England would welcome the inclusion of the 10 principles of Active Design within the Action Plan and any forthcoming Design Code. These principles would help to promote opportunities for sport and physical activity.
TP-005-010	Christopher Carroll	Sport England	Topic Paper 6	T6.07	Sport England request that outdoor sports provision and indoor sports provision are included as part of key infrastructure, separate to open space / recreation.
TP-005-011	Christopher Carroll	Sport England	Topic Paper 6	T6.08	Sport England consider it would be beneficial if Active Lancashire and the relevant governing bodies for sport were included to help protect, assess and deliver the necessary sports infrastructure with local community.
TP-005-012	Christopher Carroll	Sport England	Topic Paper 6	T6.09	The Council should use Sport England's Sport Facility Calculator and Playing Pitch Calculator as a guide to what indoor and outdoor sport will be required as a result of development. Sport England do not consider local standards as appropriate for outdoor sports between the catchment areas they do not and cannot take account of sports catchment areas.
TP-005-013	Christopher Carroll	Sport England	Topic Paper 6	T6.10	It is unclear at this stage how proposed sports facilities will be maintained and managed. It is strongly advised that the necessary national governing bodies are approached regarding this matter.
TP-006-001	Brian Jones	Ramblers Association	Topic Paper 2	T2.07	While long walk ways are unlikely to be used for commuting or regular shopping, they still make a valuable contribution in being easy to follow. We wish to see as much separation as possible between cyclists and walkers. Major dual-purpose routes should be designated in such a way that they are readily included in standard OS base maps. There should be good separation between walking routes and motorised traffic. We suggest appropriate physical barriers and 'rumble strips' be incorporated to segregate differing modes of travel. More consideration should be given to walking links into the countryside.
TP-007-001		Thurnham with Glasson Parish Council	Topic Paper 1	T1.02	The proposed vision is vague and hard to visualise. It is not clear that elements of the vision are compatible between the need to deliver housing, addressing the climate emergency and the delivery of infrastructure.
TP-007-002		Thurnham with Glasson Parish Council	Topic Paper 1	T1.03	Vagueness in the vision and language used, what is defined as the 'local vernacular'? The paper talks about green gaps in South Lancaster and Galgate but makes no reference to gaps along the A588. Objective 6 refers to the allocation of land for shops and business - if so what types and where?
TP-007-003		Thurnham with Glasson Parish Council	Topic Paper 1	T1.04	Agree with Council's preferred Approach A, but there are concerns that the intention expressed later in the Topic Paper that planning will continue for the area outside of the 'Broad Location for Growth'. The Parish will not be directly affected by development within the designation but could be significantly affected if further growth was to be planned for in years to come which have not been sufficiently planned for in infrastructure terms. To avoid such a policy vacuum Approach C may be preferable.
TP-007-004		Thurnham with Glasson Parish Council	Topic Paper 1	T1.05	Agreed, however clarification should be given on the following statement 'the growth in South Lancaster will extend before the life-span of the current plan'. What does this mean? Does it mean things will start happening before the Action Plan is agreed?

APPENDIX A: LANCASTER SOUTH AREA ACTION PLAN - SUMMARY OF ALL RESPONSE TO TOPIC PAPERS (RESPONDER ORDER) - JANUARY 2023

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TP-007-005		Thurnham with Glasson Parish Council	Topic Paper 1	T1.06	Agreed but all very vague, 3,500+ is all very well but what might an absolute number actually look like?
TP-007-006		Thurnham with Glasson Parish Council	Topic Paper 1	T1.07	There is a presupposition that there is a need for houses to be built in the South Lancaster area without first identifying a need for them or who will buy or rent them. Is there an expectation that 'local' people will buy them or will people be imported in from surrounding areas such as Manchester. What are the demographics of the people buying properties? It is not clear how 'high density development' can align with the creation of a garden village and likewise 'low density development' aligns with the need for affordable housing?
TP-007-007		Thurnham with Glasson Parish Council	Topic Paper 1	T1.08	Since it is not clear who will be living in the South Lancaster area, it is not clear what employment opportunities would be suitable.
TP-007-008		Thurnham with Glasson Parish Council	Topic Paper 1	T1.10	The garden village requires at least one large supermarket otherwise it will promote excessive levels of journeys across the City Centre and across the River Lune.
TP-007-009		Thurnham with Glasson Parish Council	Topic Paper 1	T1.11	Approach B is preferred.
TP-007-010		Thurnham with Glasson Parish Council	Topic Paper 1	T1.12	The Topic Papers do not show a need to expand the garden village area and whether future expansions would have to adhere to garden village concepts.
TP-007-011		Thurnham with Glasson Parish Council	Topic Paper 1	T1.14	The paper talks at times about the 'Broad Location for Growth', South Lancaster and the Bailrigg Garden Village, are these terms synonymous or is there a degree of difference between them? Mention is made of a desire for a country park and sports pitches, but it is never made clear whether these would be located within the 'Broad Location for Growth or could be developed within Phase 2? Our understanding is the entire scheme for South Lancaster is predicated on the sale of houses to justify the work to Junction 33 of the M6.
TP-007-012		Thurnham with Glasson Parish Council	Topic Paper 5	T5.01	The evidence will be a starting point but it is likely that a big proportion will be generic facts and may not take into account the implications to the wider catchment area.
TP-007-013		Thurnham with Glasson Parish Council	Topic Paper 5	T5.02	Not all sources are considered. It is difficult to accept that allowances can be made for the likes of Storm Desmond and hence the likes of this development will provide an even greater catchment area and faster run off. The University Campus should be included as a major flood risk source of which it has been since its inauguration. More work is needed to reduce surface water discharge and rate of discharge from the campus.
TP-007-014		Thurnham with Glasson Parish Council	Topic Paper 5	T5.03	A comprehensive and detailed survey of watercourses will need to be carried out identifying tributaries of all types along with the flow route before any calculations can be decided. Furthermore, this type of survey would need to be applied when flows are quire ample to highlight any source.
TP-007-015		Thurnham with Glasson Parish Council	Topic Paper 5	T5.04	All areas at flood risk should be protected from development given these areas will be even more at risk as a result from proposed development and these areas may become instrumental in alleviating flooding elsewhere.
TP-007-016		Thurnham with Glasson Parish Council	Topic Paper 5	T5.05	JTP have established a starting point, but these are just standard generic options. This scheme will create further risk to already vulnerable communities such as Lower Thurnham, Glasson, Conder Green, Ashton and Galgate. The A588 is susceptible to frequent flooding and this scheme can only increase the vulnerability. Further thought and in-depth research should be taken over a much wider area.
TP-007-017		Thurnham with Glasson Parish Council	Topic Paper 5	T5.06	Run-off should be reduced below the greenfield rates given that the proposed scheme will increase the non-permeable surface area significantly and result in an increased run-off rate.
TP-007-018		Thurnham with Glasson Parish Council	Topic Paper 5	T5.07	The preferred approach should be Approach A to allow for higher requirements and increased peak run-offs. It does not seem that the effects on the areas adjacent to the route and at the mouth of the River Conder are being factored in. There are other development over and above the Bailrigg Scheme already on going or proposed which have not factored in downstream and on areas further afield. The capacity and sizes of the attenuation ponds need to be shown more precisely.
TP-007-019		Thurnham with Glasson Parish Council	Topic Paper 5	T5.08	We do not agree with preferred Approach B and would choose Approach A. The land and areas for flood alleviation / mitigation should be definitive rather than indictive to prevent any future development on these areas.
TP-007-020		Thurnham with Glasson Parish Council	Topic Paper 5	T5.09	It is not clear what the principles are? Is this reference to the Water Management only or to the JTP Masterplan? The JTP Masterplan lacks transparency and is trying to promote the area as being poor in both ecological and environmental quality when in fact it is not. It is one of the most natural landscapes remaining, far more ecologically and environmentally substantial than anything the JTP masterplan can acheive.
TP-007-021		Thurnham with Glasson Parish Council	Topic Paper 5	T5.10	The requirement for SuDS being used is critical along with attentuation and slow conveyance system. Furthermore, we would like to see how the likes of traffic pollution run-off from the proposed development into these scheme is going to be addressed.
TP-007-022		Thurnham with Glasson Parish Council	Topic Paper 5	T5.11	Approach B as the preferred approach seems to be acceptable but we would like clarity on how and the types of water treatment system is applied.
TP-007-023		Thurnham with Glasson Parish Council	Topic Paper 5	T5.12	An above ground component should be used as this system would be more cost effective to maintain. However, in all systems, the downfall in maintenance will render al these components ineffective. The biggest flood risk problems in present day are as a result of lack of routine maintenance.
TP-007-024		Thurnham with Glasson Parish Council	Topic Paper 5	T5.13	Existing national and Untited Utilities technical guidance could be used as a basis but a cross-reference to the Drainage Strategy could be included.
TP-007-025		Thurnham with Glasson Parish Council	Topic Paper 5	T5.14	We would prefer Approach A and agree that Arcadis that this would ensure consistency in component delivery, design terms and future maintenance and adoptability.
TP-007-026		Thurnham with Glasson Parish Council	Topic Paper 5	T5.15	Our preferred approach for the management of SuDS would be one of two. Either United Utilities or the Local Authority. If a national and UU guidance was used in design and construction or the City Council Drainage Strategy used it would be prudent to use the relevant party to maintain. If the maintenance package is given to several parties on short term contracts, negligence and inefficiency could result in the failure of the SuDS feature.
TP-007-027		Thurnham with Glasson Parish Council	Topic Paper 5	T5.16	Points raised in relation to: - Glasson and Lower Thurnham and Conder Green appear to have been overlooked in the assessment of flood risk. - There are major flood risks around these areas, and Galgate, which JTP, Lancaster City Council and the Canal and Rivers Trust seem to be unaware of and have a lack of understanding of vulnerability of the area. - We have concerns over the JTP Masterplan and impressions of this being low-key development. The scale of what is being proposed is significant as are the flood risks associated with it. It is not clear that the flood risk for all these projects have been co-ordinated or accurately calculated and accommodated for. - It is not clear why in Policy SG1 that the setting of Lancaster University should be protect but not the important settings of long established local communities, landscape and people there in.

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TP-007-028		Thurnham with Glasson Parish Council	Topic Paper 1	T1.00	<p>The Parish Council would like to raise the following further points:</p> <ul style="list-style-type: none">- It recognises that the Council will not build the houses but is seeking to establish constrainta that the developers will have to conform to.- The Parish Council welcomes good design across developments.- The Parish Council would like to see as many affordable houses as possible within the mix.- The Parish Council questions the ability of the Council to control employment opportunities and develop business. It is highly likely that new reidents will commute by car elsewhere.- Plans for modal shift seem to depend on employment being found locally, includingthe hospital and universities but these cannot sufficiently absorb 3,500 houses.- Links to reduction in traffic in the centre of Lancaster must consider access from the south via the bottleneck at Pointer Roundabout and must find ways to reduce rat-running.- The Parish Council is extremely concerned about water management within new development. Whilst run-off is promised to be decreased it is unclear how this could be achieved given the size of attenuation areas which would be required. Run-off levels into the River Conder in particularly hould not be increased.- Water and flood management must have compulsory requirements within these developments but it is unclear how these will be enforced.- The Parish Council welcomes the ambitions for Biodiversity Net Gain.
TP-008-001	Peter Dutton	Gladman Developments	Topic Paper 1	T1.04	<p>Gladman agree that as a minumum the geographic scope of the Action Plan should be consistent with the Local Plan. Policy SG1 of the Plan sets out a expectation that a future planning framework. In this respect, Gladman believethat focussing the Council's AAP work solely on the garden village and the masterplanning work undertaken by JTP would not be an appropriate or sound approach.</p>
TP-008-002	Peter Dutton	Gladman Developments	Topic Paper 1	T1.05	<p>The Council should ensure that its proposed plan period is consistent with guidance set out in national planning policy and should consider any implications of the Action Plan enduring beyond the end date of the Council's current Local Plan. Gladman believes that the Council should also consider whether any review or performance mechanisms need to be built into the Action Plan, to offer any means of intervention in the event that proposals come forward at a slower rate than anticipated. This should include a mechanism similar to that found within Policy SG1.</p>
TP-008-003	Peter Dutton	Gladman Developments	Topic Paper 1	T1.06	<p>Gladman recognise that Policy SG1 sets a starting point of 3,500 dwellings for the South Lancaster area. However, Gladman believe that the Council should not be constrained to a particular target or requirement and should instead adopt an holistic approach to the identification of development opportunities. This in turn will determine the minimum quantum of development that should be delivered and allocated in the Action Plan.</p> <p>In exploring opportunitied, Gladman believe that the Council must alos consider the role that allocations can play to meet the district's housing needs. To achieve, Gladman believe that the Council must not concentrate development in one location, such as the garden village, but instead direct development to a range of sites and sustainable locations within the South Lancaster area. In this context Gladman believe that the Council must take into account the contribution that some sites can make to short-term delivery to meet housing needs now.</p>
TP-008-004	Peter Dutton	Gladman Developments	Topic Paper 1	T1.07	<p>Gladman recognise the importance of delivering a wide choice of housing to meet local needs and note the intention of the Council to prepare a Housing Strategy. Gladman would be grateful to review this evidence once published.</p>
TP8-008-005	Peter Dutton	Gladman Developments	Topic Paper 1	T1.11	<p>Gladman note references to the use of separation within Topic Paper 1 refer to areas of separation which appear to be orientated towards the proposed garden village. In this respect, Gladman have concerns with the identification of land for urban extensions outside of the proposed garden village site.</p> <p>In this context, Gladman believe that the potential allocaiton of urban extensions and the ability to deliver sustainable development in other areas of South Lancaster must be factored into the exploration of Areas of Separation and suggest these opportunities are not inhibited or overlooked when exploring this matter.</p> <p>Gladman note the Council's preference to allocate Areas of Separation to the North and South of the garden village, as opposed to using a criteria-based approach. Gladman believe that achieving the perception of separation, physical separation and suitable buffering can be achieved without the need for significant physical features. Gladman note that the Council have appointed external consultants to assess this subject in more detail, Gladman would welcome the opportunity to view this evidence when published.</p>
TP-008-006	Peter Dutton	Gladman Developments	Topic Paper 1	T1.12	<p>Gladman strongly support the consideration of land at Bailrigg Lane to be identified as part of an Urban Extension within the Action Plan. Gladman believe there is strong rationale for identifying this land as part of the Action Plan process. Delivery of this site would assist in the meeting short-term housing needs. To meet such needs, it is important that the Council identifies sustainable development opportunities that compliment the wider delivery of the garden village. Gladman are seeking to actively promote this area of land for development with a proposal for 644 dwellings currently with the Council.</p>
TP-008-009	Peter Dutton	Gladman Developments	Topic Paper 1	T1.13	<p>Gladman note that it is intended that any phasing plan will evolve with key stakeholders, including the development industry and infrastructure providers. Gladman would welcome the opportunity to be involved in these discussions. The Council should ensure that any proposals for phasing are appropriately evienced. Where it can be demonstrated that a site can be delivered without the need for phasing then no such phasing constraints on its build-out or the point at which development can commence or come forward. Such constraints could unnecessarily restrict the supply of housing to meet the authority's needs. Any provisions should include the flexibility to deviate from the phasing programme.</p>
TP-008-010	Peter Dutton	Gladman Developments	Topic Paper 2	T2.00	<p>With regard to travel and transport, Gladman notes that the City Council are intending to prepare their own highways assessment alongside the preparation of the Action Plan. However, it is not clear how this overlaps with the work undertaken by Lancashire County Council. Gladman believe their site interests at Bailrigg Lane provide positive opportunities for sustainable travel links for public transport, cycling and walking.</p> <p>With regard to car parking standards, it is important that the Council strike the right balance between promoting sustainable travel and meeting the day-to-day needs of new residents, this is similarly the case with the role of modal shift. Setting overly ambitious targets could result in unrealistic or unacheivable positions with adherence to targets ultimately dependent on individual travel habits. An iterative approach which seeks to encourage modal shift by the delivery of proportionate infrastructure with further monitoring may be appropriate.</p>
TP-008-011	Peter Dutton	Gladman Developments	Topic Paper 3	T3.00	<p>With regard to addressing Climate Change, Gladman believe that it would be logical for the Council to follow the direction of the ultimately adopted Local Plan and the evolving requirements of the building regulations and the Government's roadmap for delivering zero carbon development.</p> <p>In relation to matters of design and construction, Gladman would advocate an approach which sought to incorporate sustainable design and construction measures into proposals where it is possible or feasible to do so rather than being overly prescriptive or include requirements which go beyond accepted industry practice or emerging Government policy. The opportunities for delivering on sustainable design will vary from site-to-site and therefore flexibility should be provided.</p> <p>With net zero energy and distribution, it is not clear how the suggestion that support would not be offered to fossil fuel powered stationary energy as part of Action Plan is compatible to the Government's net zero road map. The same applies to the intention to follow a Local Area Planning Approach. Whilst Gladman believe this is a tool which could be used to explore opportunities, this should provide flexibility on any potential implementation expectations.</p>

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TP-008-012	Peter Dutton	Gladman Developments	Topic Paper 4	T4.00	<p>Gladman notes that the application of garden village design principles (which have arisen from the JTP Masterplan) must not pre-determine the location of development in the Action Plan given the specific focus of the JTP work on the garden village.</p> <p>Gladman disagree with some of the findings of the Council's sensitivity assessment work and its recommendations. With its own assessment finding that development would be acceptable in this location and have developed a scheme wish would carefully respect the character of the land around Bailrigg Lane, avoiding any sort of physical or perceived coalescence between Hala and the hamlet of Bailrigg. In this respect Gladman believe the sensitivity asessment is incorrect to infer that the Council should avoid development that extends South due to potential coalescence.</p> <p>With regard to the Green Halo, Gladman believe that any such concept would be best achieved by overlaps and connectivity between green infrastructure assets, rather than specific policy designation. On the issue of local landscape designations, the Council must ensure it has a robust evidence base to justify the inclusions of such designations in the Action Plan. In relation to habitats, Gladman believe there are sufficient safeguards in place through the application of separate legislation and that specific designations in the Action Plan are not required. In relation to work on a GBI Strategy, this should form a resource, rather than identifying assets or allocations within the Action Plan itself. With regard to Biodiversity Net Gain, the Council should identify the manditory 10% with the flexibility to go higher which is consistent with the national approach.</p>
TP-008-013	Peter Dutton	Gladman Developments	Topic Paper 5	T5.00	<p>In relation to discharge rates, Gladman believe that the Council should adopt an approach that is consistent with the requirements of standardised national guidance and commonly applied guidelines, including climate change allowances and allowance for urban creep. The same applies to the approach to a drainage hierarchy, with regard to this matter Gladman question whether it is approach or necessary to be prescriptive on the sustainable drainage componetns which would be deemed acceptable in the Action Plan area. Gladman consider that in relation to the manangement of SuDS components, Approach B is preferable.</p>
TP-008-014	Peter Dutton	Gladman Developments	Topic Paper 6	T6.00	<p>In respect of detailed design matters, Gladman believe a combination of applying the National Design Guide and Garden Village Principles are likely to be relevant. On the issue of design coding, Gladman believe that a flexible approach that allows design standardsand approaches to be determined on a case-by-case basis would be appropriate. This could be guided by an over-arching set of principles, but allowing specific design approaches or codes to be tailored to specific schemes.</p> <p>In relation to infrastructure delivery, Gladman would be suggest that discussions on delivery and requirement should extend to individual site promoters, who are likely to play a key role and will shape the role of infrastructure requirements. We also welcome the intention to undertake a viability assessment to support the Action Plan. In respect of housing mix, Gladman note that the Council's SHMA will be a starting point in determining the type of housing that will be delivered, however it is noted that the current SHMA is over 5 years old. We believe the SHMA could provide a starting point, however we believe that a more flexible approach should be tken to allow flexibility with a mix determined on a site by site basis. In addition, we believe the Council's current 30% threshold for affordable housing should be the starting point in the Action Plan preparation, subject to further viability testing.</p> <p>In respect of local centre provision, Gladman believe that their current proposals for Bailrigg Lane include provision of a local centre and would complement further services within the garden village.</p>
TP-009-001	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 1	T1.01	<p>It is clear that further work is necessary to determine an appropriate methodology for calculating developer contributions towards infrastructure improvements. Our clients consider further work is necessary implementation and developent phasing, consideration should be given to phasing and the consequential impacts on viability. Current timescales indicate that the Action Plan will not be adopted until 2024, is essential that the evidence base is kept up-to-date.</p>
TP-009-002	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 1	T1.02	<p>Our Clients support the overall vision for the South Lancaster area and would welcome the identification of land at Whinney Carr as a local for urban extension which can assist in the delivery of short-term housing needs. Our clients understand the need to reduce the impacts of climate change in the design of new development, sustainability is key to the Peel L&P and ensuring new development seeks to mitigate impacts is central to their thinking.</p>
TP-009-003	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 1	T1.04	<p>Our clients agree that the starting point in terms of geographical scope for the Action Plan should be the broad location for growth as identified by Policy SG1, as such Approach A is preferrable. It is however important that in preparing the Action Plan that it has regard for the potential expansion of the garden village beyond the 'Broad Location of Growth' and consider expansion such as that identified in the JTP Masterplan. This wider potential should be considered in the context of wider infrastructure delivery.</p>
TP-009-004	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 1	T1.05	<p>Our clients support Approach B subject to the Council taking on board Peel L&P's comments that the Whinney Carr site, as an urban extension to Lancaster. They early delivery of dwellings is vital to ensure the Council maintain delivery across the plan period in line with its housing requirement and to remedy the five year supply shortfall and to help meet the Council's wider social, economic and enviroinmental objectives.</p>
TP-009-005	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 1	T1.06	<p>It is essential that the Council ensures the delivery of at least 3,500 dwellings within the Action Plan area, including 1,205 within the plan period. To assist officers Peel L&P have provided indicative forecasting of how the Whinney Carr site could come forward. This clearly demonstrates that subject to securing planning permission this site can help meet short term housing requirements.</p>
TP-009-006	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 1	T1.07	<p>Our clients support Approach B in that the Action Plan should look towards a balance of high and low density across the whole area, seeking to maximise opportunities in appropriate locations. Peel L&P agree that further work is needed to determine appropriate densities for each parcel identified and it will be important to maintain flexibility to able to respond appropriately to presently unknown constraints and / or opportunities.</p>
TP-009-007	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 1	T1.09	<p>It is considered that a local centre should be provided within the garden village. However, this should not preclude the development of small community or commercial facilities elsewhere in the South Lancaster area.</p>
TP-009-008	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 1	T1.10	<p>Our clients agree the main centre should be located centrally with the garden village and it should meet the needs of the local residents without competing with Lancaster City Centre. This should not however preclude the development of smaller community facilities elsewhere. High quality pedestrian, cycle and public transport will help ensure easy and sustainable access to wider areas.</p>
TP-009-009	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 1	T1.11	<p>Our clients support Approach B, caveated that it is important that the Council clarifies how large the buffers might be and the extent of land it is expected to cover. Peel L&P is pleased that the Council have engaged external consultants to explore this matter and would welcome the opportunity to discuss the outcomes of this work. Consideration should be given to using small part(s) of the Burrow Beck area for other complimentary uses, for instance recreational purposes. This area will look to provide a purposeful green buffer with multi-functional purpose.</p>
TP-009-010	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 1	T1.12	<p>Our clients strongly agree that the Action Plan should consider the development of the Whinney Carr site as an urban extension to Lancaster.</p>
TP-009-011	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.01	<p>Our clients express a desire to work with Lancaster City Council and transport stakeholders to help to secure the early delivery of housing in this area. Whilst the existing highway network is considered to provide sufficient capacity to release some early delivery of housing, it is recognised that delivery of wider growth will require a significant level of highway infrastructure. Peel L&P agree that whilst the highway work which was undertaken for the Local Plan provides a starting point, it is not sufficient to support the content of this Action Plan and that the evidential basis on this matter needs to be expanded.</p>
TP-009-012	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.02	<p>Our clients consider that the evidence base of documents set out in Table 4.1 is comprehensive. In addition the Council could consider commissioning a Heritage Assessment, Utilities Assessment and Soil / Agricultural Quality Report. It is also clear that further work is required to determine an appropriate methodology for calculating developer contributions. Peel L&P also consider further work is required in terms of understanding how phasing will be achieved across the area. Consideraiton should be given to the phasing of sites and the consequences on viability. It will be important that the evidence provided remains up-to-date.</p>

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TP-009-013	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.03	Our clients are supportive of addressing the implications on the local highway network and the delivery of the supporting road and transport infrastructure. The Action Plan timescales should be reflective of the delivery of strategic road infrastructure being advanced by the County Council. Peel L&P endorses the proposed further assessment work from both the City and County Councils to consider the implications of the proposed levels of growth on the local highway network and welcome the intention to provide further clarity on the potential developer contributions. It is assumed that a robust evidence base would be provided for these requests. However, Peel L&P feel that the current approach is not clear and the realistic delivery of highway and transport improvements (and their phasing) should be examined in further detail.
TP-009-014	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.04	Our Clients endorse the ambitions of the BSIP and supports increased connectivity.
TP-009-015	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.05	Our Clients preferred approach to public transport delivery is considered to Approach B. Significant transport infrastructure should be proposed to support wider growth in the Area Action Plan to secure increased connectivity between South Lancaster and Lancaster City Centre. Improvements to the existing network should be undertaken alongside new infrastructure. It should be the case that developer contributions should flow from any resulting policy should be CIL compliant and pass the obligations tests in national planning policy.
TP-009-016	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.06	Our Clients preferred approach is Approach C for ensuring the delivery of cycle infrastructure.
TP-009-017	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.07	Our Clients preferred approach is Approach B as the most appropriate way of encouraging walking in South Lancaster.
TP-009-018	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.08	Our Clients endorse the role of bespoke vehicle parking standards for new development within the Action Plan area. It is likely that future delivery of housing in this area is to be at different standards (multit-modally) and so bespoke standards should be considered and implemented on a flexible site-by-site basis.
TP-009-019	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.09	Our Clients preferred approach is Approach C in terms of addressing adequate parking within the Action Plan area. However, it is important that adequate parking facilities are provided to reduce the potential for localised parking problems being created. Peel L&P strongly support modal shift as a general principle and endorses the inclusion of an active travel network. Re-investigating vehicle parking and implementing a bespoke, flexible model should be a priority of the Council to ensure that modal shift is supported and hopefully achieved in the wider context of the Climate Emergency. There is a reality that people and business will still need to use private vehicles to move around locally, rendering Approach D inappropriate.
TP-009-020	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.10	Our Clients endorses the definition of modal shift and fully supports the transition to more sustainable forms of travel and resonates with the Council's Climate Emergency.
TP-009-021	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.11	Our Clients support all those elements of modal shift set out in the Topic Paper and is fully supportive of an overall shift towards sustainable travel measures.
TP-009-022	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.12	Our Clients recognise the need to achieve modal shift through new development and is supportive of the Council investigating opportunities to achieve this. Opportunities should be identified that are able to feed into scheme design and viability at an early stage.
TP-009-023	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.13	Our Clients preferred approach is Approach C as the most appropriate and realistic way to setting modal shift targets in the Action Plan. Given the context of the Council's Climate Emergency Declaration and principle of Modal Shift within the Action Plan. Peel L&P endorses the integration of opportunities for improvement through infrastructure provision and innovative place-making.
TP-009-024	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.01	Our clients consider that the evidence base of documents set out in Table 4.1 is comprehensive. In addition the Council could consider commissioning a Heritage Assessment, Utilities Assessment and Soil / Agricultural Quality Report. It is also clear that further work is required to determine an appropriate methodology for calculating developer contributions. Peel L&P also consider further work is required in terms of understanding how phasing will be achieved across the area. Consideration should be given to the phasing of sites and the consequences on viability. It will be important that the evidence provided remains up-to-date.
TP-009-025	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.02	Our Clients preferred approach is Approach B in this instance subject to a robust viability assessment at the planning application stage. Approaches C, D and E (if implemented) would require an increasingly robust viability considerations to be made to provide flexibility to relax policy requirements where it could be demonstrated that the requirements would render development unviable.
TP-009-026	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.03	The use of renewable and low carbon energy in new development is supported by Peel L&P and will be required as part of the interim Future Homes Standard in 2022. However, there is an implication here in the desire for development to aim to deliver 100% of the operational energy by renewables. Even assuming this on a net basis, it is unlikely to be feasible on most development and may not be commercially viable. Peel L&P believe that the solutions for different sites should be considered flexibly on a case-by-case basis as demands will be different. It is crucial that this process is also subject to viability.
TP-009-027	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.04	While the targets identified are deemed generally appropriate to Peel L&P this should be caveated that their implementation and adherence must be subject to robust viability assessment on a site-by-site basis. Peel L&P believe that the energy standards in the Partial Review should be reviewed once the full Future Homes Standards metrics are known to ensure the key point of paragraph 4.3.6 is safeguarded.
TP-009-028	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.05	Our Clients preferred approach is Approach A in terms of delivering climate focussed design. Approaches B and C (if implemented) would require the inclusion of a robust viability clause to provide flexibility to relax policy requirements where it can be demonstrated at the planning application stage that the requirements would render development unviable.
TP-009-030	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.06	Our Clients preferred approach would be Approach C. Peel L&P support the Council's desire to offset carbon through new development and feel the use of an acceptable local carbon offsetting fund may provide the Council with greater flexibility and ability to achieve this aim. It should be noted however that carbon offsetting should only be introduced where it is financially viable to do so and not at risk of compromising sustainable development coming forward.
TP-009-031	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.07	Our Clients generally supports the Council's use of a carbon offset fund, subject to the Council exploring the approach further to achieve reasoned tariffs. The use of such a system must be based on a robust calculation method and any requested payments justified and appropriately used within the community. An alternative and potentially lower cost approach to addressing residual emissions without carbon offsetting would be for the development and/or residents to secure 100% renewable energy supplies. The importance and beneficial role of the fabric first approach to new buildings should not be overlooked.
TP-009-032	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.08	Our Clients endorse Approach C as the most appropriate direction for implementing embodied carbon through new development. Targets should be suggested and encouraged, but setting them as a prerogative as per Approach D could be damaging to development potential and create unviable schemes. Peel L&P believe these targets should remain as guidance only.
TP-009-033	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.12	Our Clients support the Council's approach to water efficiency and seek to maximise water efficiency and drought resilience wherever possible through new development. As such Peel L&P support Approach B and agree with its inclusion within the Action Plan and design coding in its wider context. That said, there should be some recognition of development viability.
TP-009-034	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.13	Our Clients support the principles and construction practices outlined in Policy DM30c of the Partial Local Plan Review but raise viability considerations to its application. Should either approach be taken there should be consideration for site-specific viability and a robust site viability review must be allowed at the planning application stage.
TP-009-035	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.14	Our Clients endorse Approach A and support the phasing out of fossil fuels in line with national objectives and timescales. The use of renewable and low carbon energy in new development is supported by Peel L&P and will be required via the Future Homes Standards. However, there is an implication that development should aim to deliver 100% of the operational energy by renewables. Even assuming this on a net-basis, it is unlikely to be feasible on most development and may not be commercially viable.

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TP-009-036	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.16	Our Clients endorse Approach B and supports there being a joined up and co-ordinated approach to energy infrastructure across the Action Plan Area where it is practical and does not unnecessarily delay sustainable and energy efficient development. Peel L&P support designing development to be energy efficient, minimising energy demand where feasible and viable to do so.
TP-009-037	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.17	Our Clients are supportive of the proposed LAEP approach to ensure that local constraints and opportunities to deliver sustainable energy generation are considered.
TP-009-038	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.18	In principle, our Clients are supportive of heat networks, however thermal demand density is required to make them viable and new energy efficient homes have a low thermal demand. They are more likely to be suitable where high thermal loads are present. On this basis, Peel L&P endorses Approach B which seeks to explore the feasibility of heat network delivery.
TP-009-039	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.20	In principle, our Clients support this aproach and endorses exploring models of community stewardship for local energy services, albeit this should be subject to wider site viability and other practical considerations. Any system must be commercially viable and robust and acceptable to future investors, funders and residents. At this stage Peel L&P do not have a specific approach to endorse on this matter as long as these are considered against viability and net zero considerations.
TP-009-040	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 4	T4.01	The list of evidence base documents in Table 4.1 is considered to be comprehensive. In addition the Council could consider commissioning a Heritage Assessment, Utilities Assessment and Soil and Agricultural Quality Report. Clearly further work is necessary to determine an appropriate methodology for calculating developer contributions.
TP-009-041	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 4	T4.02	Our Clients supports the identification of Lancaster's rich heritage within the Action Plan but Peel L&P do not think there is a need for further incorporation of the historic environment within the assessment of GBI potential as there is sufficient protection within existing Local Plan policies.
TP-009-042	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 4	T4.03	Whilst our Clients support the design principles and the work undertaken to date, it is considered that additional work should be undertaken as part of the Action Plan process.
TP-009-043	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 4	T4.04	The recommendations from the Landscape Sensitivity Assessment form a robust set of guiding principles which would serve to guide and underpin strong and landscape responsive proposals. The relevance of each recommendation / conclusion will vary from site to site.
TP-009-044	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 4	T4.05	Overall, our Clients support the 'Green Halo' approach and endorses its role of creating 'Green Halo' landscape. Peel L&P endorse Approach B and is strongly of the view that this should be carried forward via the Action Plan. The 'Green Halo' would sit naturally to the south of the Whinney Carr site and create distinct areas of natural separation.
TP-009-045	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 4	T4.06	It is not clear from the Topic Papers or SA work which approach the Council considers to be a logical starting point. Approach A and B seem to reflect more positive compatibility in relaition to the objectives of the SA. If it is identified that new local landscape designations are required, the starting point should be existing designations, including the criteria which underpinned them. That would be in line with Approach A but may be a further version of Approach B. Consideration should be given to national guidance on this matter.
TP-009-046	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 4	T4.07	Our Clients support the general princples of protection of habitats that are of higher ecological value. Peel L&P endorses Approach A as this will protect and highlight valued habitat across the Action Plan area. This will potentially provide insight on the provision of suitable offsets as part of the overall Biodiversity Net Gain Strategy.
TP-009-047	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 4	T4.08	Our Clients support Approach A, this should be carried forwsrd through the preparaion of the Action Plan so that it is in line with the Environment Act which will require a mandatory 10% Net Gain. Peel L&P do not support the approach to adopt a high percentage of net gain as this would be contrary to the Act. Some areas may be constrained to deliver the required proposals / mitigation so expecting more than 10% as part of the Action Plan may be unrealistic. However, it is possible that some sites could provide more than 10% but this should be encouraged rather than required.
TP-009-048	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 4	T4.09	Our Clients support Approach D and using the evidence which is tailored to the Action Plan area. If habitats of value have been identified and designated as potential enhancement through net-gain this would make it clearer where off-site delivery should be targeted. Whilst we would encourage on-site net gain, sometimes this is not always appropriate - therefore flexibility is required.
TP-009-049	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 4	T4.10	The guiding princioles highlight a useful set of aims and objectives that can be applied at a variety of scales and at various stages of the design / construction process to reduce the impacts on soil. However, mechanisms for and the practical delivery of these principles need careful consideration in terms of meeting the requirements of potentially competing elements, for example maintaining landscape character and views, habitat enhancement and net gain.
TP-009-050	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 4	T4.11	Our Clients support Approach B. The use of landscape-led design is underpinned by the identification of landscape opportunities and constraints. A landscape framework can then be developed to identify cells for development, incorporating and interwoven with a strong multi-functional network of green spaces.
TP-009-051	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 4	T4.12	Our Clients have reviewed the ecological evidence undertaken by RSK and this provides a good understanding and indicative summary of potential ecological constraints. However, it misses out on site specific granularity. It is therefore crucial that each project carries out their own detailed Net Gain Assessment to ensure that it is as accurate as possible going forward into site-specific masterplanning.
TP-009-052	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.01	The list of evidence base documents in Table 4.1 is considered to be comprehensive. In addition the Council could consider commissioning a Heritage Assessment, Utilities Assessment and Soil and Agricultural Quality Report. Clearly further work is necessary to determine an appropriate methodology for calculating developer contributions.
TP-009-053	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.02	Our Clients suggest that 'pumping stations' are explicitly mentioned in the list at paragraph 5.1.1
TP-009-054	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.03	A review of the flood mapping and site reconnaissance should be undertaken that looks at overland flood flow routes identified by LIDAR and that thee are checke on site for interaction with culverts, field drains etc.
TP-009-055	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.04	Although Approach A would result in the least impact and is a fair starting point, there may be some merit in not being too prescriptive (i.e. Approach C) as a flexible approach may allow for mitigation and enhancements to be incorporated into design and layout.
TP-009-056	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.05	Peel L&P would agree with this approach.
TP-009-057	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.06	There is growing concern that base flows can be adversely impacted were run-off rates are reduced too low. In addition for smaller sites it may become harder to effectively control run-off rates if the values are less that 1 litre per second.
TP-009-058	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.07	Peel L&P would agree with this approach.
TP-009-059	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.08	Peel L&P would agree with this approach.
TP-009-060	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.09	Peel L&P would agree with this approach. Peel L&P are aware of the flooding risks and concerns that communities in the South of Lancaster have and agrees that new development must ensure that flood risk mitigation is properly considered and included where necessary, ensuring flood and drainage management is incorporated within new schemes to prevent new flood and not make it worse elsewhere. Green and Blue spaces can play a key role in offsetting these risks as well as being relatively cost effective. Peel L&P also supports the principle that development should enhance water retention and slow the flow of water where appropriate and possibly with above ground SuDS schemes.

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TP-009-061	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.10	Peel L&P would agree with this approach. WSP would also highlight that if this is promote it should be involved in a masterplanning process. There are many cases where a 'multifunctional space' that includes water being excluded from open space - a joined up approach is to be encouraged.
TP-009-062	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.11	Peel L&P would agree with this approach as it follows the path of guidance on such matters and likely updates to the current non-statutory technical standards for SuDS.
TP-009-063	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.12	Multifunctional green space SuDS would be preferred to highly engineered elements as these offer the wide range of benefits and may for example be used as part of a Net Gain Strategy or recreational space provision. It is important to recognise that each site will be different topographically and hydrologically.
TP-009-064	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.13	Peel L&P recommend reference to existing national technical guidance. However, some cross over to design designs for urban realm may be useful.
TP-009-065	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.14	Peel L&P would agree with this approach.
TP-009-066	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.15	The current 3-way adoption of SuDS does not always result in the most cost-effective or efficiently designed drainage system, but without the SAB in place then retaining the existing system until such a time that a SAB is implemeneed will need to be the way forward. IT may be that a separate private SAB could be established as part of the Action Plan process.
TP-009-067	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 6	T6.01	The list of evidence base documents in Table 4.1 is considered to be comprehensive. In addition the Council could consider commissioning a Heritage Assessment, Utilities Assessment and Soil and Agricultural Quality Report. Clearly further work is necessary to determine an appropriate methodology for calculating developer contributions.
TP-009-068	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 6	T6.02	Our Clients supports and endorses the key design principlpes and can conform that they will be key factors in the design evolution for any development proposals coming forward.
TP-009-069	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 6	T6.03	Our Clients agree that the role of design is an important one and should be considered early in the planning process. Peel L&P agree that issues of design should be considered in the Action Plan. However, it is important that any design is inform by a site specific technical understanding. As such, Peel L&P requests that design policies are not overly prescriptive and allow for flexibility. Peel L&P support the use of Design Review Panels to help test good design.
TP-009-070	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 6	T6.04	Our Client strongly agree with the high-level spatial principles set out in the JTP Masterplan and provide an important and reasonable starting point. The masterplan was carefully prepared and produced and extensively consulted on through public and stakeholder engagement. Peel L&P are pleased that the Council is developing beyond the work prepared by JTP.
TP-009-071	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 6	T6.05	Our Clients agree that the National Design Guide provides a logical and robust starting point for the creation of well-designed places, spaces and buildings, but again it is important to maintain flexibility and consider site-by-site issues and opportunities.
TP-009-072	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 6	T6.06	Our Clients support Approach B, but only on the basiw that sufficient flexibility is placed with an overarching design code to respond to site-specific constraints and opportunities. Peel L&P is pleased that the role of a design code, however the Council would have to be mindful of striking the right balance in terms of the level of prescription a design code offers. Peel L&P would welcome the opportunity to work more closely with the Council in the preparation of the Design Code and sharing its knowledge as a landowner and developer.
TP-009-073	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 6	T6.09	Our Clients are pleased that the Council have appointed consultant to prepare a robust viability asessment of the infrastructure reuquirements required in the Area Action Plan. Peel L&P would welcome early dialogue with the viability consultants to ensure meaningul discussion.
TP-009-074	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 6	T6.14	Our Clients consider the housing mix in the Local Plan represents a snap-shot in time. Over time the identified needs for a dwelling type and size is likely to change. This is particularly the case in light of the COVID-19 Pandemic. It is important that the Council considers the viability of development when considering the desirable mix for development. An overly prescriptive mix could impact on viability, deter investors and the Council' ability to meet its overall needs for housing. Allowing a flexible housing mix will encourage the delivery of housing which responds to changing needs.
TP-009-075	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 6	T6.15	Our Clients accept that 30% affordable housing is a suitable starting point for development via the Action Plan. Peel L&P are pleased that the Council recognises the wide range of environmental and placemaking requirements plus infrastructure provision. Action Plan policy requirements for the quantum and tenure of affordable housing must be considered as part of the viability assessment. Site-by-site flexibility will be crucially important.
TP-009-076	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 6	T6.16	Our Clients support the delivery of a mix of housing types within the Action Planarea to help meet local housing need and to help satisfy future housing aspirations.
TP-009-077	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 6	T6.17	Our Clients agree that the main local centre should be located centrally in the Garden Village development and that it should meet the needs of local residents without competing with Lancaster City Centre. This should include local retail provision as well as community provision. This should not preclude the development of smaller community facilities or commercial activities elsewhere, as part of ensuring sustainable development is achieved across the Action Plan Areas. High quality pedestrian, cycle and public transport links will also be crucial.
TP-009-078	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 6	T6.18	Our Clients support Approach B, in that the Action Plan should include provision for a local centre which provides a greater diversity of uses which extends beyond simply retail. Peel L&P agree that the main local centre should be located centrally in the Garden Village development and that it should meet the needs of local residents without competing with Lancaster City Centre. This should include local retail provision as well as community provision. This should not preclude the development of smaller community facilities or commercial activities elsewhere, as part of ensuring sustainable development is achieved across the Action Plan Areas.
TP-010-001	Tim Bettany Simmons	Canal & Rivers Trust	Topic Paper 1	T1.00	This paper sets scene for development and the policy context and concept masterplan. The Trust has previously inputted into the planning policy for the area and emerging masterplan. We welcome the canal corridor has been fully considered within the overall development strategy for the site and the relationship of the development to the canal.
TP-010-002	Tim Bettany Simmons	Canal & Rivers Trust	Topic Paper 2	T2.00	We consider that improvement to the canal towpath wihtin the vicinity of the site to be delivered through the development would be critical to maximise the role and potential for the canal corridor to contribute to sustainable travel links. As previously advised, towpath improvements could have positive results for existing and new residential areas to support active travel and contribute to a longer-term version to link up with local residential areas through high quality walking and cycling routes. The increased use of towpaths for walking and cycling is highly effective at improving well-being.
TP-010-003	Tim Bettany Simmons	Canal & Rivers Trust	Topic Paper 3	T3.00	Section 5.8 makes reference to heating and cooling networks which is most relevant to the Trust and we note paragraph 5.8.2 which specifically mentions the canal. There could be an opportunity for using the canal for heating / cooling purposes adjacent to development. This would be subject to the separate consent of the Trust and following a full review and assessment. In terms of Question T.18 we do not have a strong preference, however Approach C would appear to be the most appropriate.
TP-010-004	Tim Bettany Simmons	Canal & Rivers Trust	Topic Paper 4	T4.05	Section 4.3.4 depicts 8 design principles to inform the landscape-led approach, with all of these the canal is central. It is positive that this landscape-led approach is the starting point for the design process. We note that the assessment work undertaken in the JTP Masterplan fails to take into account that much of the canal offside is tree-lined and should be considered alongside the 4 woodlands in terms of connectivity and retention of existing habitat. The Green Halo Study should take this into account. In terms of question T4.5 Approach C can consider not just landscape but ecological benefits.

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TP-010-005	Tim Bettany Simmons	Canal & Rivers Trust	Topic Paper 4	T4.07	Section 4.8 relates to ecology and notes Lancaster Canal as a wildlife corridor. Whilst the canal is considered a wildlife corridor it does not take into account the tree-lined canal in terms of connectivity. Many of the species mentioned rely on the wider canal corridor for feeding, breeding and shelter and there is concern that some of this habitat will be lost to development. In terms of question T4.7 then Approach A is preferred.
TP-010-006	Tim Bettany Simmons	Canal & Rivers Trust	Topic Paper 4	T4.11	Section 5 deals with implementing a GBI Strategy, in terms of Question T4.11 then our preferred approach is Approach E.
TP-010-007	Tim Bettany Simmons	Canal & Rivers Trust	Topic Paper 4	T4.12	Development could lead to an increase in nutrient levels and thus higher densities of INNS Canadian Waterweed such as found in the more urban areas of Lancaster. A sufficient vegetative buffer would help to combat this effect.
TP-010-008	Tim Bettany Simmons	Canal & Rivers Trust	Topic Paper 5	T5.00	In order to assess how the canal can be potentially used to reduce flood risk and incorporate drainage, any discharge to the canal will need to be assessed through the Trusts SWD mandatory process. The Trust is not a land drainage authority but we are happy to consider the potential for attenuation flows of surface water to the canal. This would be subject to a separate commercial agreement with the Trust. In response to paragraph 6.2.4 and Approaches A-D we would need to see that the flood risk to the canal is not increased.
TP-010-009	Tim Bettany Simmons	Canal & Rivers Trust	Topic Paper 6	T6.00	Sections 4.1.1 and 4.3.2 set out the approaches to design coding. By making use of the principles contained in the JTP Masterplan then this should ensure that Lancaster Canal is referenced in any coding policy. The waterway has its own particular character and any coding should explicitly take account of this. Our preference would be approach B in terms of design coding. Section 5 deals with the importance of new infrastructure. We welcome Table 5.1 which includes the cycling / walking network. It is however unfortunately that the Trust are not listed at 5.4.2 as we are a key organisation involved in infrastructure delivery and the upgrading of the canal towpath.
TP-011-001	Stephen Harris	Emery Planning on behalf of Wainhomes	Topic Paper 1	T1.11	With regard to identifying areas of separation, the broad concepts can be identified in Figure 5.2 and we have considered the three approaches which have been identified in the Topic Paper. Notwithstanding our position that our clients land should not be defined as an Area of Separation, we consider the criteria-based approach to control development as identified in Approach A is the most appropriate. Such a policy is set out in many development plans which, whilst defining a green gap / wedge / buffer, they do facilitate development. Approach B is not effective or justified as it would preclude sites coming forward for development and would not result the coalescence or loss of identify of a specific settlement. The Action Plan should not prohibit development by defining an Area of Separation unless there is a significant risk of coalescence occurring. We consider that in conjunction with flood risk would encircle Galgate and prevent and further growth which is not a proposition that can be considered reasonable or appropriate. As we have set out in separation submissions (i.e. Landscape and Visual Appraisal which supports our planning applications for our land interests) we have demonstrated that our clients site would not create coalescence or intervisibility between the Garden Village and Galgate. Going forward it is imperative that land parcels or specific development parcels are assessed by the Action Plan prior to any Areas of Separation being defined. Land which is not required or would appear to serve no separation role would be left as open countryside which then has its own policy protection.
TP-011-002	Stephen Harris	Emery Planning on behalf of Wainhomes	Topic Paper 1	T1.12	We consider that the process of investigating urban extension opportunities should not be restricted to South Lancaster but should be extended to include Galgate. This is important for housing delivery across Lancaster which has a substantial housing shortfall by also ensure Galgate's vitality and viability. Policy SP2 identifies Galgate as a sustainable settlement. Galgate is a settlement which should be a focus for growth, however there are limited opportunities for that to occur given flood risk. This therefore leads to exploring opportunities to the north of Galgate, including our clients land which is north of Highland Brow. It is our view that land in this area can adequately incorporate development and provide sufficient space to provide an effective green gap between Galgate and new development further to the north which forms part of Bailrigg Garden Village. Therefore if Approach B is pursued then there is no evidence that our clients land should be included in the Area of Separation Designation.
TP-011-003	Stephen Harris	Emery Planning on behalf of Wainhomes	Topic Paper 4	T4.05	We consider that the approach to Green Halo is appropriate for the Garden Village and Approach C would be appropriate as it should be a multi-functional area. However, as set out in other responses, this should not preclude development opportunities for a northern extension to Galgate.
TP-012-001	Joanne Harding	Home Builders Federation (HBF)	Topic Paper 1	T1.05	The HBF considers that a 20-year lifespan for the Action Plan would be appropriate, assuming that this is sufficient to cover the development of the sites and it is reviewed regularly to ensure that it remains appropriate throughout that period and is amended or updated as necessary
TP-012-002	Joanne Harding	Home Builders Federation (HBF)	Topic Paper 3	T3.00	Whilst the ambitious and aspiration aim to achieve net zero is lauded, the HBF is concerned that the Council is adding complexity of policy, regulations and standards that housebuilders are already expected to comply with. The key to success is standardisation and the avoidance of individual Council's specifying their own policy approach, which undermines economies of scale.
TP-012-003	Joanne Harding	Home Builders Federation (HBF)	Topic Paper 3	T3.05	The HBF does not consider that Approach C would be the appropriate starting point for exploring climate focused design policies. It would not be appropriate for residential development to meet locally derived standards that are significantly over and above those applied by national design standards in relation to climate focused design. However, the HBF does consider that it could be appropriate to provide support for these developments where developers are able to provide best practice or if homebuilders wish to use new or innovative technologies.
TP-012-004	Joanne Harding	Home Builders Federation (HBF)	Topic Paper 3	T3.08	The HBF considers that if the Council were to introduce a policy around embodied carbon and whole life-cycles it will have to closely consider how it will be monitored and what the implications are for the preparation of any assessment, particularly in relation to how easily accessible the data is, and will have to take into consideration that much of the responsibility for emissions will lie in areas outside of the control of the development industry. The Council will also have to consider how this approach could interact with other policies, for example energy efficiency or resilience to heat as well as overall development viability.
TP-012-005	Joanne Harding	Home Builders Federation (HBF)	Topic Paper 4	T4.08	The HBF considers that more detail will be needed in relation to these approaches in order for consideration to be given to whether they are appropriate, would be viable and would work in practice. The HBF considers that the Council would work closely with landowners and developers to determine whether these potential approaches would be appropriate. However, it is likely that a flexible approach that potentially covers elements from a number of these approaches would be the most suitable policy moving forward.
TP-013-001	J Davies	Lancaster Bus Users Group	Topic Paper 2	T2.00	The document restates the key challenge of improving the highway capacity on the A6 corridor. This appears to accept a significant increase in traffic as inevitable. The improvements to the strategic infrastructure could lead to the improved operation of buses through Galgate.

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Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-013-002	J Davies	Lancaster Bus Users Group	Topic Paper 2	T2.00	<p>There are a number of discrepancies in the Topic Paper in relation to the number and operator bus services, these should be rectified.</p> <p>Section 5.3 sets out the City Council's responsibility towards public transport, which appear to be primarily around ensuring new developments are accessible to public transport, it does not however appear to recognise the Council's role in providing bus infrastructure, such as Bus Shelters.</p> <p>Figure 5.3 suggest that the garden village will be served by an extension of existing services to the University, whilst technically feasible there are a number of issues:</p> <ul style="list-style-type: none">- Existing services to the University struggle to cope with demand during term time.- Buses would have to enter the new village via the A6 and leave via the A588 or vice versa, it is not clear whether there is any facility for buses to turn around. There is much more demand for passengers on the A6 corridor rather than the A588 corridor. A re-routed service would become less attractive to passengers to and from University. Has any forecasting of likely demand been undertaken? <p>The ideal way to serve the village would be for buses to divert off the A6, run through the site and then re-join the A6 nearer Lancaster, but this would involve a second crossing of the railway. A less satisfactory solution would be the provision of a turning area within the village itself.</p> <p>The proposed bus services caters only for journeys to and from the University and Lancaster City Centre, the close proximity of new development to the Motorway will make development more attractive to long-distance commuters which would reduce demand for bus services.</p>
TP-013-003	J Davies	Lancaster Bus Users Group	Topic Paper 2	T2.00	<p>Sections 5.5 and 5.7 relates to bus connectivity and the role of the BSIP, however the BSIP is a high level document which sets out aspirations and overall objectives rather than any detailed proposals. Whilst it is correct that the BSIP identifies a University-City-Morecambe-Heysham as a 'Superbus' route, there is no specific proposals to enhance the service along it, which already meets the BSIP definition.</p> <p>Section 5.7 relates to Park & Ride facilities and refers the need to measure demand for such a scheme. The City Council therefore appears to be less certain than the County Council to whether the P&R scheme will go ahead. The fact there is uncertainty in the City Council's mind conflicts with the stated intention of achieving modal shift.</p>
TP-013-004	J Davies	Lancaster Bus Users Group	Topic Paper 2	T2.00	<p>Section 5.10 refers to next steps and makes reference to the need for high quality bus services but it does not define them or say how they would differ from the existing service provision. Paragraph 5.10.4 refers to the role of bus gates, but the Topic Paper does not explain the location of any bus gates or how effective they will be. The best way of achieving prioritisation for buses would be to provide priority at existing bottlenecks of junctions at the Hala Junction and Pointer Roundabout and remove on-road parking along the A6.</p> <p>Section 5.10.5 refers to an emerging car parking strategy, however it is not clear how such a strategy would achieve modal shift through the reduction of spaces or increase in cost. Whilst residents of the garden village would have the option of an improved bus service to compensate them, this would not be available to the resident of the City's residents.</p>
TP-014-001	Chloe Boyle	Marine Management Organisation (MMO)	Topic Paper 1	T1.00	<p>The MMO have no specific points to make in relation to the Topic Papers, however would draw the City Council's attention to the role of Marine Management Plans and their relationship to aspects of the Action Plan, Marine Licensing and the role of North West Marine Plan.</p>
TP-015-001	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 1	T1.01	<p>The Infrastructure Delivery Plan should include consideration of healthcare and education facilities. That will ensure that the Action Plan is developed in a holistic way. The Energy Strategy should include consideration of existing utilities infrastructure, including the capacity and potential requirements for additional sub-stations connections to this infrastructure. This will require the City Council to engage with the relevant utility providers and ensure that all development, including development already committed is accounted for. The Energy Strategy should also map existing key utilities infrastructure, including national pipelines in order to understand the locations of any Health & Safety Executive consultation zones.</p>
TP-015-002	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 1	T1.02	<p>Lancaster University is concerned that the vision does not include reference to Lancaster University either in terms of its protecting or expanding the campus. As drafted the vision is too narrowly focused on the delivery of South Lancaster and therefore doesn't align with various policy requirements of Policy SG1. The vision makes reference to necessary and appropriate infrastructure, this should include open space provision in order to establish the importance of green infrastructure.</p>
TP-015-003	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 1	T1.03	<p>Generally, the university support the objectives set out in Topic Paper 1 and consider these reflect the key growth principles in Policy SG1. In relation to Objective 4, the Action Plan should seek to protect the highly successful campus eco-system and enhance the surrounding campus. With regard to Objective 6, greater emphasis should be placed on the role of the university in the economy of South Lancaster and also the critical importance of protecting the Bailrigg Campus in the context of the Action Plan.</p>
TP-015-004	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 1	T1.04	<p>The University agrees that Approach A is the most appropriate for the Action Plan. We agree that reducing the scope of the Action Plan would lead to a planning vacuum and would not be a sound or robust approach. The University is in agreement that future development beyond the plan period should be considered in future reviews of the Local Plan.</p>
TP-015-005	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 1	T1.05	<p>The University agrees with Approach B as being the most appropriate time period for delivery. However, there should be allowance for triggers for partial reviews of the Action Plan as part of the implementation and monitoring process. We propose that partial reviews of the Action Plan are undertaken every 5 years throughout its lifetime.</p>
TP-015-006	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 1	T1.06	<p>The starting point should be the position which is set out in the Local Plan and Policy SG1 rather than having a higher starting point established in documents which have limited planning weight. The approach of using Policy SG1 is less susceptible to challenge as it is based on the formal plan position which has already been through the plan-making process.</p>
TP-015-007	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 1	T1.08	<p>The university seeks recognition that within the Action Plan that student accommodation is suitable for delivery within Lancaster South. The Action Plan should recognise the delivery of student accommodation and the strong preference for this to be located primarily at the Bailrigg Campus and other appropriate locations within the wider University estate. It is critical that residential development under this use class needs to be retained and not diluted through the use of permitted development rights.</p>
TP-015-008	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 1	T1.09	<p>In order to align with Policy SG1 the Action Plan should not be exclusive related to housing development. The Plan should maximise the opportunity presented by the University facilities and should encourage economic development in this area, linked to the Health Innovation Campus. Identifying areas for economic development as well as specifically for the development and growth of the University estate.</p>
TP-015-009	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 1	T1.10	<p>The University strongly agrees that a local centre should be provided and the Action Plan should look at whether one centre is sufficient to meet local needs. The main local centre should include school, healthcare, a small element of retail, community facilities, open space and sports facilities. This will reduce pressure on existing services. The development of a local centre should not preclude additional future retail provision which serves the distinct catchment of students, staff and visitors which is separate to the garden village. In addition, new retail development should not conflict or compete with the provision at the University.</p>
TP-015-010	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 1	T1.11	<p>The University agrees that Approach B would be the most appropriate starting point. However, the areas of separation identified should show separation from the Lancaster University Bailrigg Campus. The campus is not referred to in Approach B. To establish buffers around the garden village the City Council should look at existing physical barriers. The buffers, once established, should not limit the development and expansion of the University Campus.</p>
TP-015-011	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 1	T1.13	<p>The University considers phasing is key, particularly in ensuring that required infrastructure is delivered when needed and not towards the end of development when less suitable journey patterns to other locations have already been established. There is a clear need for the Council to establish triggers in the Action Plan, in terms of numbers of residential units that will be required linked to the provision of new infrastructure.</p>

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TP-015-012	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 2	T2.04	As the Bus Rapid Transit is no longer being pursued due to viability issues, it is crucial that sufficient bus service improvements are made between South Lancaster and Lancaster City Centre to ensure that travel to bus is an attractive and realistic alternative to the private car. If this provision is not made this will limit the ability to create modal shift in South Lancaster. The University support the recognition of the need for Superbus routes connecting the corridor between Heysham, Morecambe, Lancaster and the University.
TP-015-013	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 2	T2.05	The University's preferred approach is Approach C. Proposals for long-term rail infrastructure to support the University Campus are strongly supported. Therefore potential links should not be ruled out at this stage and should inform part of the investigations into creating modal shift in the Action Plan.
TP-015-014	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 2	T2.06	The University's preferred approach is Approach C. Sustainable transport is key priority for the University as part of its Climate Emergency Carbon Reduction Plan. Approach C will ensure that new development promotes as well as upgrading existing cycle infrastructure, prioritising the key routes between South Lancaster and the City Centre.
TP-015-015	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 2	T2.07	The University's preferred approach is Approach C. Sustainable transport is a key priority to the Univeristy and therefore supports the prioritisation of walking infrastructure in new developments, alongside upgrading existing routes.
TP-015-016	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 2	T2.12	The University's preferred approach is Approach C. The University supports the principle of modal shift to encourage the use of public transport, cycling and walking routes.
TP-015-017	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 3	T3.00	The University is supportive of establishing energy efficiency measures in construction and ensuring resilience to climate change in new buildings. However, it is difficult at this stage to identify a preferred approach from the range of option detailed in the Topic Paper without having more detailed evidence of the impacts of each approach and its implications on viability. The University supports the Council's exploration of these approaches.
TP-015-018	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 3	T3.05	The University's view of carbon off-setting, as a principle, is that this should be viewed as a last resort in construction and that carbon generation should be avoided whenever possible in new developments, as a priority.
TP-015-019	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 3	T3.10	The University does not agree with the narrow focus on BREEAM as a means of measuring / assessing sustainable buildings. As such, focus on BREEAM and exclude recognition of the range of measures / assessments of suitainability is considered too restrictive. The University would favour an approach which prioritises and promotes low or zero carbon construction, rather than focusing on BREEAM ratings.
TP-015-020	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 3	T3.14	The University's preferred approach is Approach B. This aligns with the University's Energy Strategy and commitments to reducing carbon emissions.
TP-015-021	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 3	T3.16	The University's preferred approach is Approach B. Energy infrastructure planning should form a key part of the Action Plan, ensuring that there is sufficient capacity for future development, through consultation with utility providers and ensuring that is delivered in a sustainable manner.
TP-015-022	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 3	T3.21	The University recognises that food production is a key focus of the Council and welcomes the reference to the continued partnership working with the University in order to explore opportunities on how and where this could be achieved.
TP-015-023	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 4	T4.03	The University is in agreement with the 8 design principles set out in the JTP Masterplan, however the University Campus needs to be considered in a similar way to that of existing settlement. If the Action Plan considers urban extensions the same design principles should be applied.
TP-015-024	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 4	T4.04	<p>The University agrees with the following recommendations and believes these should be prioritised:</p> <ul style="list-style-type: none">- Point D: Retain and enhance tracts of woodland bordering on Lancaster University.- Point E: Promote and enhance the wider parkland setting of Lancaster University. <p>This can be secured through the Action Plan by ensuring that new landscape buffers are created. Where possible these buffers should be use existing landscape features but this should not result in 'no development' areas within the University estate. The development of buffers should therefore involve the University to ensure that the campus is protected.</p> <p>The University would query the chosen study area of the Landscape Sensitivity Assessmnt which does not match the Broad Location for Growth identified on the Local Plan Policies Map. The assessment does not include an area to the East of the M6. It is important that the evidence base aligns whlt the entire Action Plan area.</p>
TP-015-025	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 4	T4.05	The University's preferred approach is Approach C. The Green Halo should, as set out by JTP, be circular and provide sufficient offset within the garden village to its eastern and western boundaries, therefore ensuring between the garden vilage and the campus.
TP-015-026	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 4	T4.06	The University's preferred approach is Approach C. It is not considered that adding another layer of different policy to that of the Local Plan is not necessary or justified. Instead the Action Plan should build on the existing landscape designations in the Council's evidence base and Local Plan to use a criteria based approach to inform new development.
TP-015-027	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 4	T4.07	The University's preferred approach is Approach B.
TP-015-028	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 4	T4.08	In relaiton to required Biodiversity Net Gain contributions, further information is needed on the potential percentage requirement beyond 10%. It is difficult at this stage to identify a preferred approach without knowing the implications to acheivability or viability.
TP-015-029	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 4	T4.09	The University's preferred approach is a combination of Approaches B and C. As part of exploring Approach C, the Council should engage with landowners in the South Lancaster area to consider opportunities to form part of the Biodiversity Net Gain bank for parcels of the garden village and other development. The University would be happy to meet with the Council to discuss potential opportunities associated within the University estate.
TP-015-030	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 4	T4.11	<p>The University's preferred approach is a combination of Approaches B and C. Approach A is not preferred as it does not provide enough guidance to developmers and GBI may therefore be missed.</p> <p>Conversely Approaches D and E are considered to be too restrictive and does not provide sufficient flexibility for various types of GBI to come forward. Additional policy allocations for GBI are not necessary as part of the Action Plan to further restrict development but instead the Action Plan should utilise existing allocations and evidence base to guide development.</p>
TP-015-031	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 5	T5.04	<p>The University does not agree that Approach A is the most appropriate way to protect from flood risk. The University does not consider it appropriate or necessary to identify and protect flood risk areas from development within the Action Plan. This is not in accordance with national or local policy and the blanket approach that this would result in.</p> <p>Instead, a sequential approach should be taken to avoid areas at the highest risk of flooding in the context of local and national planning policy. There is sufficient existing direction to consider proposals on a case-by-case basis, taking account of potential mitigation measures. Therefore Approach C is considered to be most appropriate.</p>
TP-015-032	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 5	T5.07	The University's preferred approach is Approach B. This is because the Action Plan should align with the Partial Review of the Local Plan. The Action Plan should not seek to adopt a different policy to that in the Local Plan (as in Approach A) as this would create an additional layer and introduce further drainage requirements which would cause confusion and is not considered to be necessary or justified.
TP-015-033	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 6	T6.02	The garden village principle around cultural, recreational and shopping facilites should be expanded to reference wider social infrastructured needed to support a sustainable garden village, for instance healthcare and education. The garden village principles do not reference the University which should be rectified.

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TP-015-034	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 6	T6.04	The principles provide a reasonable starting point however it is important that Lancaster University is referred to in Principle 1. The Bailrigg Campus is a significant part of South Lancaster and it is critical that its distinct identity is protected.
TP-015-035	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 6	T6.09	If the Action Plan identifies opportunites for residential development which is not part of the garden village then all the considerations identified in Topic Paper 6 should be applicable to these areas as well as the garden village.
TP-015-036	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 6	T6.11	<p>The University strongly supports the following ambitions:</p> <ul style="list-style-type: none">- Be a thriving place of work, not a base from which to commute.- Create a local and diverse employment offer, making work more convenient and peoples lives easier.- Offer diverse economic opportunities that increase productivity.- Create hubs where people can come together and work, share knowledge and skills. <p>Connections to the University Campus and Innovation Campus are key to the economic growth in South Lancaster and so is the role of the University and its future growth / expansion should be acknowledged and referenced throughout the Action Plan.</p>
TP-015-037	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 6	T6.12	<p>The sectors identified should also include:</p> <ul style="list-style-type: none">- Heath (in recognition of the Health Innovation Campus).- Education (in recognition of the University Campus).- Professional, Financial and Business Services.
TP-015-038	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 6	T6.13	<p>The University would like to ensure the Action Plan distinguishes between employment develoment and University related growth / expansion. The Action Plan would benefit from identifying areas which should be promoted for growth of the University estate, including areas to the east of the M6 and to the west and south-east of the Bailrigg Campus.</p> <p>This would ensure that alongside employment development and housing delivery, the Action Plan delivers on the requirements of Policy SG1 in relation to University related expansion.</p>
TP-015-039	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 6	T6.14	The University would reiterate that the housing needs of South Lancaster should be met in perpetuity through restrictions, such as Article 4 directions, to ensure that the house types required to create sustainable communities are retained as such. Furthermore, the University seeks recognition within the Action Plan that student accommodation is suitable for delivery in South Lancaster. The Action Plan should recognise the delivery of student accommodation and the strong preference for this to be located primarily at Bailrigg Campus and other appropriate locations within the wider University estate.
TP-015-040	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 6	T6.17	The University agrees that local centre is required as part of the Action Plan and that Approach B is the most appropriate way to deliver this. There may be additional services / small scale retail provision outside the local centre if the Action Plan considers urban extensions to the Lancaster urban area. The local centre should not compete with existign facilities of designated centres and the University Campus. The local centre should include healthcare, education, open space and retail provision.
TP-016-001	Warren Hilton	National Highways	Topic Paper 1	T1.00	It is recommended that further evidence is required around transport, highway modelling, carbon impact and air quality. National England should be consulted on the scope and brief for the transport evidence work. It will be ciritcal for the timely delivery of infrastucture to facilitate growth, we recommend that these interventions are specific and have an associated timetable. The Topic Paper states that development will be permitted provided that residual impacts on the highway network are not severe, a discussion with the relevant highway authorities is needed to define what severe is. The document refers to the reconfiguration of Junction 33 however these references are vague and it will need to be defined what the scheme is in terms of design, modelling and costing.
TP-016-002	Warren Hilton	National Highways	Topic Paper 1	T1.01	It is unclear from the evidence base presented in Table 4.1 where a transport and movement evidence base will sit. Quantitative analysis is required to model Travel Demand Management Measures, active user scenarios and traffic modelling for various traffic horizons.
TP-016-003	Warren Hilton	National Highways	Topic Paper 1	T1.02	<p>The vision outlined refers to promoting modal shift. We consider that modal shift should be a vision for the City or wider area where there are existing congestion issues. The Vision for the 'Broad Location for Growth' should be based around the promotion of low carbon activity.</p> <p>In reference to digital connectivity it is recommended that this statement goes further in terms of thee specification and coverage of digital provision as this will help enable digital access to replace some journeys on the highway network.</p>
TP-016-004	Warren Hilton	National Highways	Topic Paper 1	T1.04	<p>National Highways agrees that Approach A is the best geographical fit from the options presented. We agree this should be aligned with the 'Broad Location for Growth' as identified by Policy SG1 of the Local Plan. However, a new version of the plan which better illustrates the transport and highway network is recommended.</p> <p>National Highways note that the existing Junction 33 is not covered by this geographical scope which may warrant further review. National Highways note that defined geographical scopes are often required for documenting where developer contributions can be spent.</p>
TP-016-005	Warren Hilton	National Highways	Topic Paper 1	T1.05	Point 7.2.4 of the Topic Paper discusses identifying a timeframe for the Action Plan. We agree that a timeframe of between 15 and 20 years represents a suitable time period.
TP-016-006	Warren Hilton	National Highways	Topic Paper 1	T1.09	It is important to note there are few allocations for employment made wihthin the Local Plan. National Highways considers that having large areas of land for employment purposes could have a detrimental impact on the Strategic Road Network (SRN). We feel that allocating some areas of land for employment purposes would have merit in economic terms and could present the opportunity for a reduction in trips through reduced commuting, however the focus should be on small enterprise opposed to large sheds or logistic uses which have a larger footprint and lower density. Opportunities should be explored to improve digital connectivity and provide shared workplace hubs. A local retail offer which would include employment is also deemed suitable in this location.
TP-016-007	Warren Hilton	National Highways	Topic Paper 2	T2.01	<p>In principle, the evidence base described represents a logical approach to the assessment of implications. However, the previous evidence prepared for the Local Plan is only partial in nature and is out-dated, it also comes from a reactive viewpoint based on previous Government direction.</p> <p>We agree that it is fundamental that new transport evidence is brought forward to take account of post-COVID travel behaviour and for this to be used to consider neww infrastructure, sustainable travel measures and modal shift. We also note the specific detail which is needed for this updated travel assessment relating to location, scale and timing of development. This information should be result in varying transport and modelling scenarios. National Highways consider that care should be taken in the production of different strategies for highways and sustainable travel, Different assessment work is needed, however it should not be disjointed and should not tackle different aspects in isolation.</p>
TP-016-008	Warren Hilton	National Highways	Topic Paper 2	T2.02	National Highways notes the evidence in Table 3.1 and this range of products represents a reasonable and proportionate basis for the production of the Action Plan. However, there is a risk of the production of several isolated documents which may be more specific. The evidence base should support the vision the site wants to acheive. The evidence should identify and assess the infrastructure required to enable people to live sustainably.

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TP-016-009	Warren Hilton	National Highways	Topic Paper 2	T2.03	<p>National Highways would welcome further engagement with the Council in relation to the reconfiguration of Junction 33. It is our recommendation that an area wide model is development and run to undertand the implications of traffic rerouting from the reconfigured junction and associated road infrastructure. We support the City Council's proposal of updating assessment work on the local highway network but suggest caution on terminology. At this early stage we recommend seeking to design-out additional vehicle travel demand, not accept it, and identify additional infrastructure to accommodate the resulting demand. A proactive approach in terms of designing low carbon development would be supported as opposed to a mitigation led approach.</p> <p>In terms of the approach to highway matters, it is our view that there are existing transport capacity challenges in the Lancaster area which need to be addressed through modal shift and potentially mitigation measures such as Travel Demand Management. This is a different aporoach to which should be taken for the garden village, which is a design-led approach to facilitate a low carbon development from the outset.</p>
TP-016-010	Warren Hilton	National Highways	Topic Paper 2	T2.04	<p>An enhanced bus service is needed if there is a modal shift from private car usage to other modes. We broadly agree that the ambitions of the BSIP provide sufficient scope for connectivity between South Lancaster and the City Centre. It is noted that work on the City Centre Movement Strategy and Bus Rapid Transit projects were based on the reallocation of road space to support public transport movements. The decison not to pursue roadspace reallocation along the A6 is considered to be disappointing and potentially limits the promotion of active and sustainable travel. The Topic Paper indicates that whilst some funding has been secured for bus improvements this only extends to bus priority measures on Ashton Road and in Bowerham. Without funding to deliver other elements of the BSIP, National Highways have concerns over the level of ambition of schemes and potential bus usage as part of development across the South Lancaster area.</p>
TP-016-011	Warren Hilton	National Highways	Topic Paper 2	T2.05	<p>It is our view that Approach B which will seek to advance proposals which promote the role of public tranport across South Lancaster is suitable. It is however understood that funding to deliver these improvements may be challenged. It is recommended that an area wide integrated network is proposed as the business case to enable the key A6 and A588 corridors to function to their full potential.</p>
TP-016-012	Warren Hilton	National Highways	Topic Paper 2	T2.06	<p>In relation to the proposed cycle superhighway, National Highways would like to understand the funding and delivery mechanism to provide the segregated cycle route between the A6 and Hazelrigg Lane, northwards towards the junction with Ashton Road. Any proposals should be brought forward in the context of Government guidance, particularly document LTN/20.</p> <p>National Highways note that the plans state 'aspirational' cycle routes suggesting there has been no feasibility work undertaken to date. We would seek to understand what the evidence base for the Active Travel Action Plan routes are base on.</p> <p>We support the approach of creating strong connectivity and accessibility across the garden village area but also that this is integrated into a wider upgraded network. Noting all of this, we agree that Approach C would be the most suitable in addressing these matters.</p>
TP-016-013	Warren Hilton	National Highways	Topic Paper 2	T2.07	<p>We agree with Approach C for walking provision in South Lancaster. It will be important for the new development to deliver permeable walking routes for direct and active travel on foot. We agree with the proposed approach of a 10-minute neighbourhood which allos strong connectivity and accessibly across the area. The surrounding routes into Lancaster City Centre and the University Campus are essential in requiring integraton with the new development. The emerging Sustainable Travel Strategy should take account of the latest walking infrastructure guidance LTN/20 and the updated policy circular 01/2022.</p>
TP-016-014	Warren Hilton	National Highways	Topic Paper 2	T2.09	<p>It is our view that Approach C does present a good approach to reducing vehicle parking within the Action Plan area. However, as this development is not yet built there is the opportunity to design for alow carbon, low demand development from the outset - in which case we would also support Approach D. Care is suggested in relating the use of promoting modal shift as an aspiration as this should be only required for excess trips which need to be taken and which cannot be made by foot or by bike.</p>
TP-016-015	Warren Hilton	National Highways	Topic Paper 2	T2.10	<p>We broadly agree with the definition presented of modal shift. However, we recommend further consideration is given to the DfT Transport Decarbonisation Hierarchy. This guidance places avoiding travel or reducing the need to travel ahead of active travel, mass transit or electric vehicles.</p>
TP-016-016	Warren Hilton	National Highways	Topic Paper 2	T2.11	<p>A number of the initiatives stated appear to be unviable or currently undefined, for example bus rapid transit, new cycle routes and re-allocated road space. As such it is recommended that a broad range of incentives and disincentives are explored through the Action Plan and this is accompanied by delivery and funding mechanisms. Initiatives considered should include policy levers, behaviour change, marketing and training.</p> <p>As part of the Action Plan process the Council should investigate the propensity for change in terms of the possible uptake in cycling and walking. This is required as background evidence to inform the proposed measures and modal shift changes. This will provide further evidence on the expected level of impact of travel demand on the highway network.</p>
TP-016-017	Warren Hilton	National Highways	Topic Paper 2	T2.12	<p>We agree that the Council should investigate opportunities for modal shift in preparing the Action Plan. We support the proposed Approach C for ambitious levels of modal shift given the development is not yet fully planned out. However, as stated it appears reactionary to start from a position of modal shift - the development should be designed to enable and promote low carbon living. Modal shift targets should be made for the first and subsequent occupation of the site through a Travel Plan.</p>
TP-016-018	Warren Hilton	National Highways	Topic Paper 2	T2.13	<p>National Highways recommends that a city wide / area wide approach is taken to creating modal shift to help address the Climate Emergency, this may include initiatives such as Travel Demand Management and Traffic Management. As new development in the area, starting wiht a relatively low trip basis development should seek to achieve low carbon, low travel demand from the outset.</p>
TP-016-019	Warren Hilton	National Highways	Topic Paper 6	T6.02	<p>We broadly support the principles stated, however recommend that reference is made to the updated DfT Policy Circular 01/2022.</p>
TP-016-020	Warren Hilton	National Highways	Topic Paper 6	T6.07	<p>National Highways is of the view that whilst no aspects of infrastructure are missing, the user hierarchy should place vulnerable road users at the top and prioritise low carbon development and travel.</p>
TP-016-021	Warren Hilton	National Highways	Topic Paper 6	T6.08	<p>It is recommended that the following groups are consulted - Sustrans, the Ramblers Association, Local Walking and Cycling Groups, Equestrians and Public Transport Operators.</p>
TP-017-001	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.01	<p>The Lead Local Flood Authority (LLFA) gnerally agree with the evidence base set out. However, reference to 'Drainage Strategy' should be amended to 'Flood Risk Assessment & Sustainable Drainage Strategy' to better reflect the work which is being undertaken.</p>
TP-017-002	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.02	<p>The sources of flood risk sgould include - Coastal, Fluvial, Canal, Groundwater, Reservoir, Surface Water and Sewer. It is crucial that current and future flood risk from these sources are considered, taking into account Climate Change. The LLFA advise that flooding from these sources are assessed for their respective design in the context of national policy. The Council will need to carefully consider how fluvial flood risk will be identified, as there may be additional ordinary watercourses in the area other than those currently mapped and modelled. In addition, any analysis of flood risk will need to carefully consider groundwater flood risk up-front, noting there is no statutory consultee on this matter.</p>
TP-017-003	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.03	<p>Extensive investigations and modelling will be needed to assess the flood risk from systems which are not currently mapped in order to establish this up-front. These constraints may not be identified until detailed surveying and ground investigations have been undertaken by developers on their individual sites. The Council need to ensure there are robust policies within the Action Plan so that if any previously unidentified systems are discovered the associated flood risk can be robustly assessed and mitigated by the developer. It is also important to note that flood risks associating from drainage features, where they fall outside the definition of an ordinary watercourse, may require specific investigation.</p>
TP-017-004	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.04	<p>The LLFA agree with Approaches A, B and C as all offer consistency with national policy, however we recognise that Approach A will result in the best overall integrated strategy for managing flood risk in the locality.</p>
TP-017-005	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.05	<p>The LLFA generally agree with the approach set out in the Masterplan, subject to the necessary Climate Change allowances being applied. However, it should be ensured that ponda are not prescribed as the only attenuation component and should instead promote a variety of multi-functional SuDS components in series to manage water and deliver benefits beyond just water quality, quantity, amenity and biodiversity.</p>

APPENDIX A: LANCASTER SOUTH AREA ACTION PLAN - SUMMARY OF ALL RESPONSE TO TOPIC PAPERS (RESPONDER ORDER) - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-017-006	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.06	<p>In specific circumstances, it may be appropriate to take a catchment based approach to run-off rates below the equivalent greenfield run off rates where there is an associated downstream flood risk and robust evidence can be provided to demonstrate that this will result in a decreased risk. It will be critical that any policies which take such an approach to be fully evidenced and justified.</p> <p>However, it is also important to consider the volume of run off from the site which can be reduced by utilising source control to maximise infiltration. Other measures, such as natural flood management should also be used to reduce downstream flood risk.</p>
TP-017-007	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.07	<p>The LLFA agree with Approach B which offers consistency with the LLFAs own advice.</p>
TP-017-008	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.08	<p>The LLFA agree with Approach B. This is the preferable to Approach A as flood risk management authorities do not currently have a strong pipeline for future flood alleviation schemes, meaning it is unlikely the robust evidence of the viability of future schemes to support Approach A could be created.</p> <p>Not safeguarding land, under Approach B, is preferable as developers will still be expected to provide betterment under policies within the Action Plan. This presents significant opportunities for Flood Risk Management Authorities to work with developers to deliver privately funded flood alleviation schemes.</p>
TP-017-009	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.09	<p>Principle A of the JTP Masterplan is currently retractive in the nature of SuDS components that could be integrated into the Action Plan. This should be updated to ensure that ponds are not prescribed as the only attenuation component and should lead to the promotion of a variety of SuDS components to create multi-functional benefits. In addition, a fifth principle around source control should be added to reflect national planning practice guidance and a sixth principle of natural flood management should also be added to reflect the ambitions of the Action Plan to provide betterment.</p>
TP-017-010	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.10	<p>Yes. The LLFA expects development proposals to deliver multi-functional benefits via SuDS. Multifunctional drainage system are those which deliver a wide range of additional biodiversity and environmental net gains beyond water quality, quantity, amenity and biodiversity benefits. All proposals are expected by national planning policy to provide multiple benefits where possible. If multifunctional systems are not being provided, evidence should be provided by developers to show why such techniques are not possible in line with paragraph 59 of the National Planning Policy Framework.</p>
TP-017-011	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.11	<p>All approaches are acceptable to the LLFA. Ultimately this is a matter to consider from an urban design perspective, rather than a flood risk perspective.</p>
TP-017-012	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.12	<p>The LLFA expect above ground, multifunctional SuDS components to be prioritised, in line with national guidance and the LLFA guidance. The Council will need to carefully consider how any SuDS components will be identified at this stage and carried forward into the Action Plan given the lack of evidence of site-specific ground conditions in the Action Plan area.</p>
TP-017-013	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.13	<p>Ample technical guidance already exists and so the LLFA strongly advises signposting to that guidance that the Council deem most appropriate for the Action Plan area. This is preferable to the Council producing new guidance on the matter.</p>
TP-017-014	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.14	<p>Approach C is preferred by the LLFA in terms of the technical design of SuDS components as technical design guidance is set out nationally. In terms of the general selection of SuDS components, the principle of multifunctional SuDS being delivered has already been established within the hierarchy set out in Policy DM34.</p>
TP-017-015	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.15	<p>The LLFA agree with Approach B with any maintenance agreements covered by appropriate legal agreement. Options for this include:</p> <ul style="list-style-type: none">- Adoption by an appropriate water and sewerage company.- Adoption by the local highways authority and/or National Highways.- Where SuDS is not offered for adoption, or only partly adopted, a Section 106 agreement secured in agreement with the local planning authority prior to the grant of any planning permission. <p>The LLFA expect all SuDS to be designed to adoptable standards and subsequently offered for adoption by an appropriate adopting body. The implementation of SuDS Approval Bodies (SABs) may be explored but given the emerging legislation on this matter it cannot be assumed that a SAB will be a viable option.</p>
TP-017-016	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.16	<p>Further points to raise include:</p> <ul style="list-style-type: none">- The Council should consider the maintenance arrangements for any watercourse in the Action Plan area. Existing watercourses should be protected and, where appropriate, enhanced through new development. The culverting of watercourses should be avoided.- When designing a layout, it is critical to consider the future ownership of and access to any on-site watercourses for maintenance purposes. No development should occur within 8 metres from the bank top of any ordinary watercourse, this includes the construction of structures such as walls and fences.- It will not be acceptable for watercourses to be subject to maintenance regimes associated with fragmented riparian ownership. Applicants must demonstrate that on-site watercourses are subject to clear and co-ordinated management and maintenance regimes.- The Action Plan should include key principles for the management of surface water during the construction phases of development to ensure no increase in flood risk elsewhere and protection of the water quality of receiving watercourses. This is particularly important to establish clear collaboration and cooperation between developers across multiple allocations.- The Action Plan should require developers to provide as-built details of any flood risk assets, including SuDS components and natural flood measures, in an appropriate GIS format for these to be recorded by the relevant flood authorities, particularly the LLFA.
TP-018-001	Kim Wisdom	Lancashire Wildlife Trust	Topic Paper 3	T3.01	<p>The evidence presented seems reasonable and proportionate.</p>
TP-018-002	Kim Wisdom	Lancashire Wildlife Trust	Topic Paper 3	T3.07	<p>Approach C seems the most logical. With regard to paragraph 4.9.2 you may find it of assistance to talk with the Trust's Peatland Team regarding Winmarleigh Moss and the Carbon Farm as well as future plans for upland / lowland peat restoration. Also consider the content of the Trust's 'Position Statement on Climate Action' (Supplied as part the response).</p>
TP-018-003	Kim Wisdom	Lancashire Wildlife Trust	Topic Paper 3	T3.08	<p>In terms of design codes, the Trust recommend the use of the 'Building with Nature Standards Framework 2.0'.</p>
TP-018-004	Kim Wisdom	Lancashire Wildlife Trust	Topic Paper 3	T3.11	<p>The Trust recommend the use of the 'Building with Nature Standards Framework 2.0'.</p>
TP-018-005	Kim Wisdom	Lancashire Wildlife Trust	Topic Paper 4	T4.01	<p>The evidence presented seems reasonable and proportionate.</p>
TP-018-006	Kim Wisdom	Lancashire Wildlife Trust	Topic Paper 4	T4.07	<p>The Trust's preferred Approach would be Approach A.</p>
TP-018-007	Kim Wisdom	Lancashire Wildlife Trust	Topic Paper 4	T4.08	<p>Work on the JTP Masterplan made clear that development in this area should be exemplar, if so the Option B should be adopted for the Action Plan which seeks to deliver Net Gain above the mandatory 10% minimum.</p>
TP-018-008	Kim Wisdom	Lancashire Wildlife Trust	Topic Paper 4	T4.09	<p>It is difficult to provide a conclusive response on this matter, it is likely that a hybrid approach is required but any direction provided in the Action Plan should be reflective of national policy and legislation.</p>
TP-018-009	Kim Wisdom	Lancashire Wildlife Trust	Topic Paper 4	T4.10	<p>The Trust is in complete agreement with the soil principles identified.</p>
TP-018-010	Kim Wisdom	Lancashire Wildlife Trust	Topic Paper 4	T4.11	<p>The Trust do not think that Approach A would be appropriate and would consider a hybrid of Approaches D and E would be preferable.</p>

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Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-019-001	David Alexander	N/A	Topic Paper 4	T4.00	<p>Having read this consultation paper I full endorse the need to understand and respond to the topography of the area and the need to respect distinctive landscapes. It is importan that Section 2 on understanding the natural environment contains a introductory section which sets out a clear understanding on how this landscape and its biodiversity has come about over time, principally through the longstanding and continuous managment of both the landscape for a range of purposes. How far will these management arrangements be curtailed or ended within the Action Plan? How will the landscape and biodiversity continued to be managed, by whom and at what cost?</p> <p>It should be possible build on the content of para 2.1.1 which contains some good points, but should try and go further and build in the long term management and maintenance elements required.</p> <p>Whilst the Environment Act will be a useful tool for the Council, who is going to preside over Local Nature Recovery Strategies? Where will the expertise come from to ensure that the mandatory 10% net gain is delivered?</p> <p>Similarly, how will the management of the garden village take place amongst the important natural assets? Can some form of farming continue? Who will manage hedgerows? The landscape sensitive assessmrnt provides a key basis for management and maintenance practices. Will the Council fund a management and maintenance team to work across the area or will this be outsourced to the private sector?</p> <p>The implementation of a GBI Strategy will be challenging for the Council and it is questioned whether they are best placed to undertake the work. One solution could be to secure local knowledge and expertise on matter from with the private and voluntary sectors.</p>
TP-020-001	Melanie Fryer	N/A	Topic Paper 1	T1.00	<p>Stop any further building on Green Belt land and no not sell off land which could be farmed. Renovate and have local occupancy for all homes and businesses currently not being used. Use eco-friendly materials and simplify policies. Any new builds which are currently underway need to be well insulated wiht renewable energy features. Wildlife should have priority on all sites, green spaces use for local community use, sport and growing food and some areas left undisturbed. Dedicated wildlife areas should be encouraged with tree planting. All Council site should have a no peat and no pesticides policy.</p>
TP-021-001	Emily Hrycan	Historic England	Topic Paper 1	T1.00	<p>Thank you for consulting Historic England, at this stage we have no comments to make on the content.</p>
TP-022-001	Liz Locke	Environment Agency	Topic Paper 5	T5.00	<p>Points raised includes:</p> <ul style="list-style-type: none">- Providing detailed comments on the drainage strategy is not within our remit and we are not resourced to provided this service as part our flood / coastal management function. Notwithstanding this, if it becomes apparent that there is a potential for surface water to have an impact we could raise this with you as part of our strategic overview function.- We are generally in agreement with the documentation which has been currently presented for the Action Plan. We would be satisfied for proposals for surface water drainage for development parcel to be developed in accordance wiht these documents, along with subsequent amendments and mitigation measures identified.
TP-023-001		Lancaster Civic Vision	Topic Paper 1	T1.00	<p>We are disappointed at the lack of clearer more specific comments to the provision of social housing. Topic Papers 1 and 6 makes no specific reference. The Council's own Homes Strategy clearly demonstrates the urgent need for additional social housing. We would therefore argue that the Action Plan should contain a clear commitment without caveat to the provision of a significant level of social housing.</p>
TP-023-002		Lancaster Civic Vision	Topic Paper 1	T1.06	<p>We welcome the approach to housing numbers set out in Topic Paper 1 which regards the figure of at least 3,500 homes as a starting point. However, we have difficulty this reconciling this with the decision of the Council in August 2021 to sign the HIF Collaboration Agreement which was predicated on the prospect of over 9,000 additional homes in South Lancaster. We believe that in accepting that decision the Authority is faced wiht enabling the provision of 9,000 new homes or accepting the financial consequences of failing to do so. We are dubious that the two sets of considerations can in reality be kept separate.</p>
TP-023-003		Lancaster Civic Vision	Topic Paper 1	T1.07	<p>We applaud the Council's ambitions to deliver housing quality design and environmental standards. However, as significant proportion of land in South Lancaster is under the ownership of volume housebuilders we anticipate pressure from those parties to undermine this ethos. We would seek reassurance that the various controls referred to in the Topic Papers to ensure that the basic design and environmental principles of the Garden Village can be effectively imposed on developers.</p>
TP-023-004		Lancaster Civic Vision	Topic Paper 2	T2.00	<p>We accept the arguments for need for remodelling of Junction 33 and the provision of a new road. However, we would wish to register the following concerns:</p> <ul style="list-style-type: none">- We are sceptical about the technical feasibility and cost effectiveness of the proposed new railway underpass.- We are strongly of the view that the extent of the bus, cycling and walking improvements are insufficient to achieve the objectives of achieving modal shift.- We are concerned over the current pause in discussions between the City and County Council's relating to transport improvements in Lancaster. We would urge both parties to resolve this situation as a matter of urgency.
TP-024-001	Alban Cassidy	Cassidy & Ashton	Topic Paper 1	T1.01	<p>The evidence base should also include Agricultural Land Grading, a full suite of Ecology Surveys ad Utilities Surveys to understand the existing range of capacity of services that are available.</p>
TP-024-002	Alban Cassidy	Cassidy & Ashton	Topic Paper 1	T1.02	<p>The vision itself is acceptable but the key is to ensure that it is truly achieved and it is essential that the Council are committed and have the appropriate policies in place to ensure that development is truly sustainable.</p>
TP-024-003	Alban Cassidy	Cassidy & Ashton	Topic Paper 1	T1.03	<p>The objectives do not reflect the Key Principles in Policy SG1 but, the key is for the Council to ensure that the objectives are truly achieved. In particular Objective 2 which seek to create neighbourhoods which are well connected and well integrated to the existing built up area.</p>
TP-024-004	Alban Cassidy	Cassidy & Ashton	Topic Paper 1	T1.04	<p>The geographic scope for the development should be wholly contained with the 'Broad Location for Growth' as identified by Policy SG1. It would therefore it contrary to consider land outside of that area.</p>
TP-024-005	Alban Cassidy	Cassidy & Ashton	Topic Paper 1	T1.05	<p>It is agreed that Approach B is the appropriate way forward as this accords with National Policy.</p>
TP-024-006	Alban Cassidy	Cassidy & Ashton	Topic Paper 1	T1.06	<p>It is agreed that the proposed starting point of at least 3,500 homes is appropriate as this accords with adopted development plan policy.</p>
TP-024-007	Alban Cassidy	Cassidy & Ashton	Topic Paper 1	T1.09	<p>It is essential that the Action Plan allocates land for employment purposes. For development to be truly sustainable it is important that it provides a variety of uses to prevent it becoming a dormitary settlement.</p>
TP-024-008	Alban Cassidy	Cassidy & Ashton	Topic Paper 1	T1.10	<p>A local centre should have a mix of uses beyond simply retail, provision should be made for medical facilities and community uses such as a village hall. The key to location is not simply to have a central location but to have a accesible locaton. Given the difficulty in making small developments viable, it may be sensible to create in a location where it is also visible / accessible to users of the A6 and even the University. It would make sense to create an initial centre in such a location with a secondary centre being created at a later date.</p>
TP-024-009	Alban Cassidy	Cassidy & Ashton	Topic Paper 1	T1.11	<p>It is recognised that some communities wish to retain their own identity but this is less essential for sustainable development and it may be appropriate to consider a more consolidated approach where development is integrated within the existing built up areas and University. A modest belt of open land can be retained north of Galgate but there is no justification in maintain separation from Lancaster or the University itself. Indeed to do so would result in a less efficient use of land.</p>
TP-024-010	Alban Cassidy	Cassidy & Ashton	Topic Paper 1	T1.12	<p>It would be senstive to consider future extensions. Concentration should be on any infill within the existing built up areas rather than simply any extensions west into the open countryside.</p>
TP-024-011	Alban Cassidy	Cassidy & Ashton	Topic Paper 1	T1.13	<p>A phasing plan would be appropriate and should be baed upon the construction of the link road with development starting at the South-Eastern corner of the proposed village. This will ensure the necessary infrastructure us provided rather than being car dependent being developed in the middle of the Action Plan area.</p>
TP-024-012	Alban Cassidy	Cassidy & Ashton	Topic Paper 2	T2.03	<p>The emphasis should be to include opportunities for access to additonal development areas afforded by the link road alongside travel alternatives. Consideration should also be given to opening up roadside services that support the link road.</p>

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TP-024-013	Alban Cassidy	Cassidy & Ashton	Topic Paper 2	T2.04	Great emphasis should be given to creating viable and sustainable bus links which can run through the development area and link onto the A6. This could be in the form of a multi-modal park and ride facility located adjacent to both the A6 and new link road.
TP-024-014	Alban Cassidy	Cassidy & Ashton	Topic Paper 2	T2.05	Approach C is preferred. The proposals set out in Approaches A and B are laudable and supported but given the high quality rail line with the Action Plan area and the land available next to it for a station and park & ride facilities this option should continue to be explored, even if this simply leads to the future safeguarding of land for future delivery.
TP-024-015	Alban Cassidy	Cassidy & Ashton	Topic Paper 2	T2.06	A mixture of Approaches C and D are supported and provide the most sustainable alternatives to the car or the potential link into a new park & ride facility along the A6 corridor. Without high quality linkages and the upgrading of the surrounding road network, desirability of such transport will be severely reduced.
TP-024-016	Alban Cassidy	Cassidy & Ashton	Topic Paper 2	T2.07	Ideally Approach D should be adopted to limit car use but also make the provision of a park & ride facility more desirable to the wider area and more viable due to demand.
TP-024-017	Alban Cassidy	Cassidy & Ashton	Topic Paper 2	T2.11	There should be a greater emphasis on developing a park & ride facility in a location which is accessible from the A6 and the new link road but also adjacent to the railway line in order to create the opportunity for the future provision of a railway station.
TP-024-018	Alban Cassidy	Cassidy & Ashton	Topic Paper 2	T2.13	Approach C is supported to make the development as ambitious as it can be.
TP-024-019	Alban Cassidy	Cassidy & Ashton	Topic Paper 3	T3.05	Approach C should be supported. Developers should be encouraged to be ambitious and support should be given to development that is carbon neutral or of similar benefit.
TP-024-020	Alban Cassidy	Cassidy & Ashton	Topic Paper 3	T3.06	Approach B is supported. Offsetting is acceptable but should take place within the defined area of the Action Plan to ensure it is closely linked to the developed area.
TP-024-021	Alban Cassidy	Cassidy & Ashton	Topic Paper 3	T3.08	The approach taken should be as ambitious as possible but if Approach D is not followed, proposals that meet such aspirations should be supported even when they do not directly accord with the finalised Action Plan.
TP-024-022	Alban Cassidy	Cassidy & Ashton	Topic Paper 3	T3.10	The approach taken should be as ambitious as possible but if Approach D is not followed, proposals that meet such aspirations should be supported even when they do not directly accord with the finalised Action Plan.
TP-024-023	Alban Cassidy	Cassidy & Ashton	Topic Paper 3	T3.15	Agreed if at all possible. If the development is mixed use there may well be excess heat generated by commercial uses which could feed into a district wide heating system.
TP-024-024	Alban Cassidy	Cassidy & Ashton	Topic Paper 3	T3.16	Approach B should be followed. In order to utilise renewable energy and make the development low carbon then the energy infrastructure needs to be well planned for. Opportunities to add renewable energy generation should be maximised.
TP-024-025	Alban Cassidy	Cassidy & Ashton	Topic Paper 3	T3.17	Agreed, this is a logical approach.
TP-024-026	Alban Cassidy	Cassidy & Ashton	Topic Paper 3	T3.18	Approach B is supported. This is the rational option that supports the basis of a heat network but not requiring such detail that would hold back development.
TP-024-027	Alban Cassidy	Cassidy & Ashton	Topic Paper 3	T3.20	Approach B is supported as it supports the principle of community energy projects specifically.
TP-024-030	Alban Cassidy	Cassidy & Ashton	Topic Paper 3	T3.21	If local food production is part of the Action Plan, there should be land value equalisation for any such land used for that purpose to incentivise the use.
TP-024-031	Alban Cassidy	Cassidy & Ashton	Topic Paper 4	T4.04	The Landscape Sensitivity Assessment seems to indicate that much of the proposed development is more sensitive to development than that alongside the A6 corridor. It is therefore considered that more consideration should be given to development in this area.
TP-024-032	Alban Cassidy	Cassidy & Ashton	Topic Paper 4	T4.05	Approach A. The idea of a 'green halo' seems somewhat artificial and may result in barriers between the development and existing built-up areas where more integration may result in more sustainable land use. Rather than simply adopting a 'green halo', a site-by-site approach could be undertaken to enhance the landscape setting whilst making the most efficient use of land.
TP-024-033	Alban Cassidy	Cassidy & Ashton	Topic Paper 4	T4.06	Approach C seems to take account of the Landscape Sensitivity Assessment and therefore seems an appropriate basis for consideration of particular land-uses.
TP-024-034	Alban Cassidy	Cassidy & Ashton	Topic Paper 4	T4.07	Approach A should be the starting point but a criteria based assessment alongside the need for Biodiversity Net Gain should be considered for the remainder of the sites under consideration.
TP-024-035	Alban Cassidy	Cassidy & Ashton	Topic Paper 4	T4.08	Approach B. A development of this scale should aspire to go beyond simply a policy-compliant scheme. The majority of the landscape is nature depleted agricultural land and there is potential for significant improvement including using surrounding land with the Action Plan area.
TP-024-036	Alban Cassidy	Cassidy & Ashton	Topic Paper 4	T4.09	Approach C. This will assist in meeting the original aspiration for land value equalisation by giving land value to land within the Action Plan area which may not be developed.
TP-024-037	Alban Cassidy	Cassidy & Ashton	Topic Paper 4	T4.11	No preference other than Approach A. There should be some degree of policy requirement to ensure a coherent and constructive Green and Blue Infrastructure base to avoid it being delivered in a piecemeal fashion.
TP-024-038	Alban Cassidy	Cassidy & Ashton	Topic Paper 5	T5.04	Approach A is acceptable and accords with national planning guidance.
TP-024-039	Alban Cassidy	Cassidy & Ashton	Topic Paper 5	T5.05	The JTP Masterplan has no weight at this time and therefore the Action Plan and accompanying Drainage Strategy should address the issues of water management in detail.
TP-024-040	Alban Cassidy	Cassidy & Ashton	Topic Paper 5	T5.07	Approach B represents a rationale and policy compliant approach to setting out attenuation requirements and peak discharge rates.
TP-024-041	Alban Cassidy	Cassidy & Ashton	Topic Paper 5	T5.08	Approach B is agreed but areas identified for flood alleviation should be part of the land equalisation process and should be identified via the Action Plan unless sufficient land is not available. Such areas should be regarded as part of the new development space.
TP-024-042	Alban Cassidy	Cassidy & Ashton	Topic Paper 5	T5.13	Yes. Technical guidance that goes into more site-specific detail relevant to the remainder of the proposals for the area and the provision of blue infrastructure should be part of the Drainage Strategy.
TP-024-043	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.02	The garden village principles are agreed but also should have 'land value capture for the benefit of the local community'. This is one of the key principles of the garden village movement inherent to achieving a high quality balanced development where areas which are ultimately being used for other purposes than housing or commercial uses still contribute to the wider development as a whole. Without this, development will inevitably be dictated by land ownership rather than by design and quality.
TP-024-044	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.03	Given the requirement now for design to play a greater role in the decision making process, the Action Plan should set the ground rules which then should be taken forward in a design code. All interested parties should be involved including the use of workshops.
TP-024-045	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.04	It is acknowledged in Topic Paper 1 that the concept Masterplan carried little weight. As such, and following this consultation the masterplanning process should recommence using the evidence base identified and taking account of this consultation.
TP-024-046	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.05	The National Design Guide that has been prepared by the Government has to carry some weight, however it is more of a starting point and a more site-specific approach needs to be applied.
TP-024-047	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.06	We consider the masterplanning process should be started afresh, taking all evidence into account. As such a new approach to design must be taken that is based upon evidence and this consultation process.
TP-024-048	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.07	There is no reference to the provision of park and ride, nor safeguard a potential site for a future railway station. Rather than just EV charging there should also be reference to an EV Charging Station which would be set close to the A6 corridor and new link road.
TP-024-049	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.08	The list should include Network Rail and EV charging station providers.

APPENDIX A: LANCASTER SOUTH AREA ACTION PLAN - SUMMARY OF ALL RESPONSE TO TOPIC PAPERS (RESPONDER ORDER) - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-024-050	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.11	In respect to employment in general, we believe development should be genuinely mixed use and provision should be made for other forms of employment including office, high tech and logistics given the proximity to the University and M6.
TP-024-051	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.12	The sectors identified are generally appropriate.
TP-024-052	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.13	Approach B is supported. For the deveopment to be truly mixed use and therefore sustainable it is essential to bring employment uses through early in the process and this is best achieved by identifying land for such uses in appropriate locations.
TP-024-053	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.17	There is scope for a more accessible local centre which may be closer or on the new A6 / link road corridor which means that it will be also accessible for those travelling along both routes therefore increasing footfall and viability. This could be supplemented by a further centre in later phases of development if appropriate.
TP-024-054	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.18	Yes. A foodstore would be an important part of a new community to avoid the need for longer journeys for main food shops. However, this should be sited in an accessible location and should be available to passing trade and not just local residents making the A6 / new link road corridor the most suitable location.
TP-024-055	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.19	Approach C is preferred and broadly accords with the comments we have made elsewhere in respect of serving wider need and being accessible both to new development and those using the A6 / new link road corridor to maximise demand and viability.
TP-025-001	Jill Marie Bargh	N/A	Topic Paper 4	T4.01	Very concerned that historical pastures and meadows are not being considered as this will be a significant loss to Lancaster's local heritage and food production capcity. The Action Plan need to best fit Lancaster's development needs and I believe that the development of the best and most versatile agricultural land should either be avoided altogether or at least minimised as an absolute last resort. The Action Plan needs to reflect on the direction of national policy in relation to protecting and conserving the natural environment.
TP-025-002	Jill Marie Bargh	N/A	Topic Paper 4	T4.02	Considers that there is evidence of agriculture and droving routes dating back to roman times. Further research should be done into Agricultural History / Development and whether people appreciate historic green landscapes. Any proposals should minimise the loss of agricultural land and maximise the delivery of biodiversity net gain.
TP-025-003	Jill Marie Bargh	N/A	Topic Paper 4	T4.03	I accept the design principles apart from point 5. I reject the notion that the garden village area of search is a monoculture. Whilst there is mainly only one crop (grass) there are many different variety of grasses. Grasslands in South Lancaster possess healthy nutrient rich soils. The 'Green Halo' idea is okay but I do not feel it is necessary to surround development where there is already wonderful wildlife corridors - for example Lancaster Canal.
TP-025-004	Jill Marie Bargh	N/A	Topic Paper 4	T4.04	Recommendations A, B and C are the most important priorities here. I also agree there is plenty of room for the university to extend parkland.
TP-025-005	Jill Marie Bargh	N/A	Topic Paper 4	T4.05	Approach C is preferred. Then both human and wildlife populations can both enjoy the outdoors. If funds do not permit the building of new paths then at least try and accommodatethe wildlife. Would like to see investment in the canal towpath to make it navigable for cycling and walking.
TP-025-006	Jill Marie Bargh	N/A	Topic Paper 4	T4.06	Approach C is preferred on the basis that my preference is to have several smaller settlements, rather than one large settlement using too much agricultural land. Having green buffers between settlements would be preferable.
TP-025-007	Jill Marie Bargh	N/A	Topic Paper 4	T4.07	Approach B is preferred. I see little point designating habitats when there is agricultural land which already providers many natural habitats. My request is that the use of agricultural land is minimised so there is plenty of natural habitat remaining for wildlife.
TP-025-008	Jill Marie Bargh	N/A	Topic Paper 4	T4.08	The development of garden village uses productive agricultural land which is a double whammy for agricultural food production. Whether Approach A or B is selected it is important that development is on the less valuable land.
TP-025-009	Jill Marie Bargh	N/A	Topic Paper 4	T4.09	Approaches C or E are preferable. This should remain flexible as all farmers in and out of the area and will be looking to receive funds from grant or sale for removing this land from production. If designations need to be made, then less productive marginal land yielding less food or difficult to farm due to steep gradients, thins soils would be a logical choice.
TP-025-010	Jill Marie Bargh	N/A	Topic Paper 4	T4.10	I agree with your principles here, as little land as possible should be used so that the most valuable and fertile land is retained.
TP-025-011	Jill Marie Bargh	N/A	Topic Paper 4	T4.11	Approach B is preferred. Definitely need to set of key design principles and a suide to how you expect GBI to be delivered. It is assumed that funds for transport and biodiversity net gain is to come from developers. If 9,000 houses are to be built make the roof tax affordable to developers to pay for the necessary infrastructure, if an unnecessarily large amount of development takes place it would be easy to draw green and blue corridors, but if only 3,500 houses are required then the extra expense of the spine road and the concept of the garden village may not be required. This may be preferable.
TP-025-012	Jill Marie Bargh	N/A	Topic Paper 4	T4.12	Another proposal put forward. It is clear a lot of work has gone into this project to date however the reasons for such growth are wrong as there is not a need for new housing due to changes in immigration and the level of empty properties which exist in the City. Further work should be done to move students out of family housing and HMOs into more purpose-built student accommodation. Reductions in housing growth in this area would lead to better and more extensive opportunities for environmental enhancements and the reduction in a requirement of new infrastructure, for instance road, which would improve development viability.
TP-026-001	Patricia Clarke	Dynamo Cycle Campaign, Lancaster	Topic Paper 2	T2.01	No. It is not logical to agre to such a large development without definite plans being put in place before embarking on a major transformation.
TP-026-002	Patricia Clarke	Dynamo Cycle Campaign, Lancaster	Topic Paper 2	T2.03	You do not have up-to-date information about the number of houses nor are you able to specify what the post COVID-shifts in travel patterns are. Logic is one thing, facts are another.
TP-026-003	Patricia Clarke	Dynamo Cycle Campaign, Lancaster	Topic Paper 2	T2.04	More concrete informaiton is needed before such a question can be answered, for example if it is impossible to build a road under a railway line where do you go from there?
TP-026-004	Patricia Clarke	Dynamo Cycle Campaign, Lancaster	Topic Paper 2	T2.05	If the A6 I not to be further clogged by individual cars from the new development it will be necessary to provide disincentives as well as incentives to use buses.
TP-026-005	Patricia Clarke	Dynamo Cycle Campaign, Lancaster	Topic Paper 2	T2.06	The plans are so nebulus at present. The Council should not expect the canal towpath to be regular utility route from Lancaster, it is unlit and passes under low bridges.
TP-026-006	Patricia Clarke	Dynamo Cycle Campaign, Lancaster	Topic Paper 2	T2.10	The definiton seems fine but it will be difficult to realise and implement.
TP-026-007	Patricia Clarke	Dynamo Cycle Campaign, Lancaster	Topic Paper 2	T2.12	It would be good if it was also committed to be implemented.
TP-026-008	Patricia Clarke	Dynamo Cycle Campaign, Lancaster	Topic Paper 2	T2.13	It sounds ambitious but there are so many caveats that its easy to see that nothing will change.
TP-027-001	Helen Sara Taylor	N/A	Topic Paper 3	T3.01	Unfortunately damage to green spaces from intensive agriculture and development over recent years means that commissioning surveys at the current time falls foul of the shifting base lines for biodiversity. We need to look at historical data for biodiversity to understand what as been lost at least within living memory and set targets for improving biodiversity accordingly. Any greenfield site has the potenital for biodiversity and addressing the climate change more than a developed site, it the potential for improving carbon capture and biodiversity that we need to assess.
TP-027-002	Helen Sara Taylor	N/A	Topic Paper 3	T3.02	Approach E is preferred.
TP-027-003	Helen Sara Taylor	N/A	Topic Paper 3	T3.03	Yes, specific entry targets and energy adaption should be set as a minimum and be exceed where possible.
TP-027-004	Helen Sara Taylor	N/A	Topic Paper 3	T3.05	Approach C is preferred. Housing developers currently operating across the North West have no intention of delivering climate-focussed design. I would argue that the requirement for construction to mee these long-term, strategic goals must be paramount.

APPENDIX A: LANCASTER SOUTH AREA ACTION PLAN - SUMMARY OF ALL RESPONSE TO TOPIC PAPERS (RESPONDER ORDER) - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-027-005	Helen Sara Taylor	N/A	Topic Paper 3	T3.07	Not supportive of carbon offsetting because of sceptacism about human nature in general and feel that organisations can be used as an excuse for business as usual.
TP-027-006	Helen Sara Taylor	N/A	Topic Paper 3	T3.08	Approach D is preferred.
TP-027-007	Helen Sara Taylor	N/A	Topic Paper 3	T3.10	Approach D is preferred, para 4.17.2 points out BREEAM does not deliver net zero buildings.
TP-027-008	Helen Sara Taylor	N/A	Topic Paper 3	T3.11	Yes, non-residential development should go beyond BREEAM.
TP-027-009	Helen Sara Taylor	N/A	Topic Paper 3	T3.12	Approach B is preferred.
TP-027-010	Helen Sara Taylor	N/A	Topic Paper 3	T3.13	Approach B is preferred.
TP-027-011	Helen Sara Taylor	N/A	Topic Paper 3	T3.14	Approach B is preferred.
TP-027-012	Helen Sara Taylor	N/A	Topic Paper 3	T3.15	Pointless developing with installed gas connections, therefore no further expansion of fossil fuel stationary energy.
TP-027-013	Helen Sara Taylor	N/A	Topic Paper 3	T3.16	Approach B is preferred, we must have a plan for the limits to growth and therefore expected energy use. The worry about a development area is that having a development area it is seen as a green light for overdevelopment. The limits to growth should be stipulated in the Action Plan and we must aim to limit physical growth.
TP-027-014	Helen Sara Taylor	N/A	Topic Paper 3	T3.17	Agree that the LAEP represents a logical starting point.
TP-027-015	Helen Sara Taylor	N/A	Topic Paper 3	T3.19	Yes, agree that it represents a logical starting point.
TP-027-016	Helen Sara Taylor	N/A	Topic Paper 3	T3.20	Approach C is preferred. The built environment should carry solar panels, green space should not be covered in solar panels. This is the problem we start to get with physical growth and increased energy demands.
TP-027-017	Helen Sara Taylor	N/A	Topic Paper 3	T3.21	Yes, opportunities for food production are important but place a great deal of faith in commuities and require a tight reign on the type of development to facility community uses.
TP-027-017	Helen Sara Taylor	N/A	Topic Paper 3	T3.22	Approach B is preferred as once houses are in private ownership it is impossible to dictate the use to which owners put their own land.
TP-027-018	Helen Sara Taylor	N/A	Topic Paper 3	T3.23	The number of houses, housing density and number of bedrooms should be limited from the start otherwise it will become a new town rather than a new village.
TP-027-019	Helen Sara Taylor	N/A	Topic Paper 3	T3.24	It is critical that the Action Plan sets limits to growth, we must seek to retain as much green space as possible, seek to utilise brownfield sites as much as possible.
TP-027-020	Helen Sara Taylor	N/A	Topic Paper 4	T4.01	I feel that any ecological evidence which starts from the current degraded baseline is unfit for purpose. This is not the baseline we should be working to, our baseline should be from the early to mid seventies when the ecological diversity was greater. The language of topic paper 4 suggests that biodiversity is not high on the list of considerations . To recover, nature needs large areas of continuous green spaces, not multifunctional spaces. When our green space is already so degraded, a 10% uplift is not sufficient.
TP-027-021	Helen Sara Taylor	N/A	Topic Paper 4	T4.02	The Council need to be open about any pressures exerted by the University to identification of land in South Lancaster and the long term ambitions of the University relating to energy generation.
TP-027-022	Helen Sara Taylor	N/A	Topic Paper 4	T4.03	It is not possible to balance a range of ambitions, you need to prioritise and it doesn't seem to me that biodiversity is top of the list otherwise this site would not have been identified as an area suitable for growth.
TP-027-023	Helen Sara Taylor	N/A	Topic Paper 4	T4.04	Yes, instead of using the euphemism of a 'Green Halo' we should be creating uninterrupted connections to areas such as those managed by the Fairfield Association.
TP-027-024	Helen Sara Taylor	N/A	Topic Paper 4	T4.05	Green areas should remain as large as possible and with approaches which prioritise growth in ecological value and increased biodiversity.
TP-027-025	Helen Sara Taylor	N/A	Topic Paper 4	T4.06	The Council have already given up on this, it is already an urban landscape.
TP-027-026	Helen Sara Taylor	N/A	Topic Paper 4	T4.07	Both approaches would leave concern that appraisals are only looking to avoid habitat loss rather than aiming to limit development and seeking to retain and upgrade all green areas. I would view Approach A as the least worst option.
TP-027-027	Helen Sara Taylor	N/A	Topic Paper 4	T4.08	Approach B is preferred. To recover, nature needs large areas of continuous green spaces not multi-functional recreational corridors. When our green space is already so degraded then 10% biodiversity net gain is not sufficient.
TP-027-028	Helen Sara Taylor	N/A	Topic Paper 4	T4.09	I have concerns over the whole credit theory in this context regardless of whether credit be related to carbon or net gain. Approach C is not attractive. However, I am not clear which approaches cover on-site only, which cover off-site only and which cover both. Based on the desire for interconnectivity for the benefit of nature and wildlife preference would be an approach which covers both.
TP-027-029	Helen Sara Taylor	N/A	Topic Paper 4	T4.10	Yes, I agree with the principle of soil protection set out in Section 4.14.
TP-027-030	Helen Sara Taylor	N/A	Topic Paper 4	T4.11	Approach E seems to provide the greatest potential for Net Gain but it depends on the standards and thresholds set. Arguably, key strategic green and blue corridors should be identified, protected and enhanced and measures taken to prevent development creep in the future.
TP-027-031	Helen Sara Taylor	N/A	Topic Paper 4	T4.12	I strongly feel that South Lancaster should not have been identified as an area for development growt on the basis that amenities and facilities are already available to the north of the City. If development in this location goes ahead, clear limits to physical growth must be set otherwise there will be overwhelming pressure for further development.
TP-028-001	Ian Chadwick	N/A	Topic Paper 2	T2.03	I cannot comprehensive why you cannot simply add a new junction to the M6 just south of the University onto Hazelrigg Lane. This would not only be more economical but also stop road and noise pollution being brought further west from the M6.
TP-029-001	Katrina Barnish	N/A	Topic Paper 1	T1.01	No, the evidence sought by the Council is completely inadequate. The public has been conducted in such a way that the residents at best have not been listen to and at worst had their views manipulated.
TP-029-002	Katrina Barnish	N/A	Topic Paper 1	T1.04	Building domitory suburbs where car use will be essential will be exactly the opposite of what needs to happen. Congestion issues in Lancaster City Centre is well known. Residents of Lancaster deserve more than empty promises that improvements will follow if South Lancaster goes ahead. Brownfield areas are many across the whole city and wider areas which should be being exploited.
TP-029-003	Katrina Barnish	N/A	Topic Paper 1	T1.05	No, the whole planning process should be started again with a genuine commitment to listen to the views of others. Also real solutions should forward to the very valid concerns of the community. The reality has been that no viable or acceptable solutions.
TP-029-004	Katrina Barnish	N/A	Topic Paper 1	T1.07	I agree that a diverse mix of houses / accommodation should be built but this should be across the whole area. We are no longer required to have a specific area for growth and people should get a choice where they live.
TP-029-005	Katrina Barnish	N/A	Topic Paper 1	T1.08	No, the 'Broad Location for Growth' is no longer valid in the current and changing future circumstances.

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TP-029-006	Katrina Barnish	N/A	Topic Paper 1	T1.09	Land should be allocated for employment purposes across the whole of the Lancaster area and not just South Lancaster.
TP-029-007	Katrina Barnish	N/A	Topic Paper 1	T1.10	Central facilities in the new areas should consist of shops, cafes, healthcare, fitness, community facilities, library, play facilities, pubs and green spaces.It should be the priority of the Council to restore and improve facilities across the existing areas before investing in communities that don't exist.
TP-029-008	Katrina Barnish	N/A	Topic Paper 1	T1.11	This question is not considered to be relevant as the so called Areas of Separation have already been built, or plan to be built on. Any land left between areas will likely be unsuitable for building. Specific areas of separation could mean that communities are isolated with residents unable to easily access facilities.
TP-029-009	Katrina Barnish	N/A	Topic Paper 1	T1.12	Increasing population in existing areas would help to provide a more vibrant communities and essential resources including new or expanded schools and health facilities.
TP-029-010	Katrina Barnish	N/A	Topic Paper 1	T1.13	If the plan is continued if should be rolled out in a very gradual way with specific targets. This would lead to evaluation of progress made and revision of future plans in light of progress.
TP-029-011	Katrina Barnish	N/A	Topic Paper 1	T1.14	The whole plan needs to be restarted again from scratch. South Lancaster now needs to be considerably smaller and should only go ahead following genuine consultation. I would suggest a citizens assembly is formed to scrutinize the public consultation, rather than being left to external consultants.
TP-029-012	Katrina Barnish	N/A	Topic Paper 2	T2.01	The evidence is not adequate and has been gathered over a short period of time. It is upsetting to be told that traffic in your area is acceptable when you struggle to cross the road. The information gather pays no attention to the constant roadworks. The broad location suggested in South Lancaster is too far away from the City Centre for any type of modal shift in travelling. The result of this plan will be to enforce car dependency.
TP-029-013	Katrina Barnish	N/A	Topic Paper 2	T2.02	There is no acceptable evidence for this level of growth.
TP-029-014	Katrina Barnish	N/A	Topic Paper 2	T2.03	Housing should be built in areas with existing transport networks to enable them to be more sustainable and improve.
TP-029-015	Katrina Barnish	N/A	Topic Paper 2	T2.04	No, without provision of a light railway line or some other new form of transport, South Lancaster will just result in even more congestion, particularly in Central Lancaster.
TP-029-016	Katrina Barnish	N/A	Topic Paper 2	T2.05	If development in South Lancaster goes ahead it should be car free suburb with exceptions for those with disabilities. A congestion charge should be implemented in Central Lancaster as soon as possible. This is the only way to start a 'modal shift'.
TP-029-017	Katrina Barnish	N/A	Topic Paper 2	T2.08	There should be no parking. The A6 simply does not have the capacity to take more cars without increasing the misery of existing residents and the asociated pollution which is known to have impacts on health.
TP-029-018	Katrina Barnish	N/A	Topic Paper 2	T2.09	Car parking should only be provided for people with disabilities or for car share schemes.
TP-029-019	Katrina Barnish	N/A	Topic Paper 2	T2.10	There has been no effort or strategy put into alleviate traffic issues in Lancaster. Therefore there is no evidence what so ever, that the Council is serious about 'modal shift'. This is purely a strategy to alleviate residents worries, modal shift should start now.
TP-029-020	Katrina Barnish	N/A	Topic Paper 2	T2.12	Yes
TP-029-021	Katrina Barnish	N/A	Topic Paper 2	T2.14	The papers state that less traffic will be generated in South Lancaster due t the fact that more people will work from home. This is a very flawed argument from the point of view that surely this means that the change to the motorway junction would also not be needed.
TP-030-001	Simon Bibby	N/A	Topic Paper 1	T1.01	No
TP-030-001	Louise Gill	RSPB	Topic Paper 1	T1.04	The JTP Masterplan has provided village type areas to be in keeping with the area while providing space for nature in woodlands and green areas.
TP-030-002	Louise Gill	RSPB	Topic Paper 1	T1.10	A local centre should include doctors, dentist, schools, food shops, cafes an other shops located within walking distance.
TP-030-003	Louise Gill	RSPB	Topic Paper 1	T1.12	No, there are sensitive areas around this development site including Conder Green Wetlands which need to be protected. The massive increase of people will have adverse impacts on these areas, therefore new developmentsshould be planned elsewhere to spread out the burden.
TP-030-004	Louise Gill	RSPB	Topic Paper 1	T1.13	Yes, it is important to ensure building work isn't being undertaken everywhere at once, allowing space for wildlife. It is critical the required service are planned for in the first phase including schools, doctors and dentists.
TP-030-005	Louise Gill	RSPB	Topic Paper 2	T2.01	A modal shift in transport used by all is required to allow us to meet climate change targets. This includes increased use of cycling and walking, increased availability and decreased costs of public transport.
TP-030-006	Louise Gill	RSPB	Topic Paper 2	T2.03	We believe that the use of cycling and public transport should be at the forefront of these plans especially to remove on-local traffic from the city. Cycling infrastructure needs to be significantly improced to ensure cyclist are safe and away from vehicles. Buses need to be more regular and cheaper for those living just outside the City.
TP-030-007	Louise Gill	RSPB	Topic Paper 2	T2.05	Approach C is preferred. This has the potential to remove many students and staff from the network before they get to Lancaster. A park and ride for South Lancaster and cycling needs to be a priority.
TP-030-008	Louise Gill	RSPB	Topic Paper 2	T2.06	Approaches C and D are both favourable. The cycle network needs an overview in Lancaster with cycle routes disappearing and reappearing, being covered in debris, pot holes and services. A cycle route segregated from cars from Galgate to the City Centre is required and could be achieved if parked cars were to be removed. There should be barriers to ensure vehicles cannot enter the cycle paths.
TP-030-009	Louise Gill	RSPB	Topic Paper 2	T2.07	Approaches C or D are both favourable. The footpaths need upgrading outside the Action Plan area to provide connection to the City Centre and University. No car development sounds wonderful in principle but there is concern it may lead to cars being elsewhere.
TP-030-010	Louise Gill	RSPB	Topic Paper 2	T2.08	Yes. The removal of cars off roud onto drives is safer for all pedestrians and cyclists.
TP-030-011	Louise Gill	RSPB	Topic Paper 2	T2.09	It is good to reduce cars and increase public transport but also consider those who are unable to use these forms of transport. Perhaps reducing the number of cars allowed per household depending on size / requiring electric cars is a possibility.
TP-030-012	Louise Gill	RSPB	Topic Paper 3	T3.02	Approach E is preferable. We are in a Climate Crisis and our energy consumption and creation is a big problem. All new housing should be built to the best available standards available and not just a minimum to ensure they are future proofed and sustainable.
TP-030-013	Louise Gill	RSPB	Topic Paper 3	T3.03	The targets must be necessity to meet and should be checked upon completion otherwise they won't be met.
TP-030-014	Louise Gill	RSPB	Topic Paper 3	T3.04	It is important that all houses built are carbon neutral and are producing their own energy for sustainability and with the increase in electric car use.
TP-030-015	Louise Gill	RSPB	Topic Paper 3	T3.05	Approach C is preferred. The broader area need to be planned in detail to ensure that climate change is accounted for in the sense of biodiversity, energy efficiency, flooding and ensuring the design is thought out thoroughly to provide the services and road that will be required. There are significant issues relating to roads in South Lancaster which needs to be tackled by providing better sustainable transport links. There are a range of planning permissions which are being submitted across the South Lancaster area which will increase the flooding to current residents. There are other more suitable locations for development which Approach C will allow for being determined. Approaches A and B do not allow for greater thought into how wildlife and the wider ecosystem can survive. We need to ensure that all builds are undertaken as nature friendly as possible.
TP-030-016	Louise Gill	RSPB	Topic Paper 3	T3.06	Carbon offsetting needs to be provided locally in the area that is being built on.

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TP-030-017	Louise Gill	RSPB	Topic Paper 3	T3.07	The amount of carbon that will be needed to be offset locally and should be ensured by visits that it has taken place.
TP-030-018	Louise Gill	RSPB	Topic Paper 3	T3.08	Approach D is preferred. To create a truly carbon neutral development, embodied carbon needs to be included to meet the Council's Climate Emergency targets.
TP-030-019	Louise Gill	RSPB	Topic Paper 3	T3.10	Approach D is preferred. If we are a species want to be around in the future then we need to put Climate first.
TP-030-020	Louise Gill	RSPB	Topic Paper 3	T3.11	All residential and non-residential development should meet the most environmental / climate friendly targets.
TP-030-021	Louise Gill	RSPB	Topic Paper 3	T3.12	Approach B is preferable. South Lancaster has had several major flooding event in recent years. All this building needs to account for resilience to the new and older housing stock with the Action Plan area, particularly considering the downstream effects. More needs to be done than just the Local Plan to ensure there a holistic catchment approach is found to ensure water is held back but also can drain quick enough.
TP-030-022	Louise Gill	RSPB	Topic Paper 3	T3.13	Approach B is preferable. All building needs to be resilient into the future.
TP-030-023	Louise Gill	RSPB	Topic Paper 3	T3.14	Approach B is preferable. All new homes should look into the future and be fitted appropriately.
TP-030-024	Louise Gill	RSPB	Topic Paper 3	T3.15	From day one. We should lead the way in sustainable development and how it should be done with the future in mind.
TP-030-025	Louise Gill	RSPB	Topic Paper 3	T3.16	Approach B is preferable.
TP-030-026	Louise Gill	RSPB	Topic Paper 3	T3.18	Approach C is preferable.
TP-030-027	Louise Gill	RSPB	Topic Paper 3	T3.21	Yes, all those set out in paragraph 6.2.4 and using land as multiuse such as crop and fruit trees with buffer strips to encourage bees.
TP-030-028	Louise Gill	RSPB	Topic Paper 3	T3.22	Approach C is preferable.
TP-030-029	Louise Gill	RSPB	Topic Paper 3	T3.23	It is important to ensure job opportunities locally to reduce travel and carbon emissions.
TP-030-030	Louise Gill	RSPB	Topic Paper 4	T4.01	An ecological assessment needs to be undertaken at various times of the year to account for various species. This should cover the development areas to determine where / which species including breeding, feeding and wintering locations.
TP-030-031	Louise Gill	RSPB	Topic Paper 4	T4.03	The JTP Masterplan incorporates joined up habitats which is good for species movement. It should be ensured that roads do not segregate environments by installing bridges thatallow the habitats continue undisturbed. Some areas should have people / pets excluded.
TP-030-032	Louise Gill	RSPB	Topic Paper 4	T4.04	Delivering the green infrastructure for the wildlife that will be displaced is a high priority and ensuring vegetation to cool waters and provide better habitats. People and dogs should be excluded from some areas to ensure there are safe undisturbed habitats.
TP-030-033	Louise Gill	RSPB	Topic Paper 4	T4.05	Approach C is preferred. The 'Green Halo' can also provide habitat and expand the bluebell woods currently present. Therefore ensuring the righth type of native trees and other graded habitats from grassland to woodland.
TP-030-034	Louise Gill	RSPB	Topic Paper 4	T4.06	Approach B is preferred. The Council needs to designate areas to prevent the onslaught of planning applications . The plan is required to protect our wildlif but also provide facilities / infrastructure required for such a large development.
TP-030-035	Louise Gill	RSPB	Topic Paper 4	T4.07	We agree the existing habitats need to be protected to prevent degregation such as the bluebell wood west of the canal in Galgate which would be destroyed with increased footfall off the path.
TP-030-036	Louise Gill	RSPB	Topic Paper 4	T4.08	Approach B is preferred. The higher proportion of Net Gain will allow for the money to be spent on improving designated grassland and woodland of the local area including signage and wardening of the area to ensure its continued to be improved over time.
TP-030-037	Louise Gill	RSPB	Topic Paper 4	T4.09	Approaches C and D are both favourable. To identify areas on and off site locally where residents will influence due to increased numbers. The co-ordinated approach will allow for a variety of improvements to be made and the key species focused on.
TP-030-038	Louise Gill	RSPB	Topic Paper 4	T4.10	The RSPB agrees with the principles set out Professor John Quinton and his team at Lancaster University.
TP-030-039	Louise Gill	RSPB	Topic Paper 4	T4.11	Approach E is preferable. The approach needs to have the locations and standards clearly defined to ensure delivery of the green and blue infrastructure.
TP-030-040	Louise Gill	RSPB	Topic Paper 5	T5.06	With Climate Change and the increase in heavier rainfall, it is advantageous to reduce run-off rates below greenfield rates as this allows for some future proofing. It also can take land back to previous rates when greenfield sites were covered in woodland.
TP-030-041	Louise Gill	RSPB	Topic Paper 5	T5.08	Due to the flooding in Galgate, at least development is bein drained into Ou Beck, it is suggested that Approach A should be used to ensure that the discharge rates when the Beck is at its highest discharge is decreased to ensure Galgate is more future proofed. Development provides a good opportunity to increase attenuation and reduce the discharge of Ou Beck upstream from Galgate. It is also suggested that the discharge rates for Burrow Beck also takes into account new housin and other potential housing upstream.
TP-030-042	Louise Gill	RSPB	Topic Paper 5	T5.09	Reduction of river discharge at high flows to protect communities downstream.
TP-030-043	Louise Gill	RSPB	Topic Paper 5	T5.10	Yes, these will provide extra habitat and increase biodiversity. Some should be used / managed for babitat with the reduction of people / dogs entering.
TP-030-044	Louise Gill	RSPB	Topic Paper 5	T5.11	Yes
TP-030-045	Louise Gill	RSPB	Topic Paper 5	T5.12	Above ground SuDS will provide better habitats for wildlife.
TP-030-046	Louise Gill	RSPB	Topic Paper 5	T5.13	Set out technical guidance to strict criteria which ensues maintenance and checks to ensure that they are in place and functioning over time.
TP-030-047	Louise Gill	RSPB	Topic Paper 5	T5.14	No, something as vitally required to prevent flooding and futureproof the area must be stipulated clearly the Council policy therefore Approach A is preferred. It is often seen across the Country where SuDS are not undertaken properly and then fail.
TP-030-048	Louise Gill	RSPB	Topic Paper 5	T5.15	The SuDS management needs to be maintained to a high standard to ensure flooding does not occur therefore Approach A is preferred to ensure it is managed and maintained appropriately.
TP-030-049	Louise Gill	RSPB	Topic Paper 6	T6.03	Yes, design should be stipulated within the Plan to ensure housing and commercial buildings meet the Council's Climate Emergency. They should include things like solar panels, vehicle chargers, swift boxes and hedgehog holes.
TP-030-050	Louise Gill	RSPB	Topic Paper 6	T6.04	Yes and to improve biodiversity and habitat types.
TP-030-051	Louise Gill	RSPB	Topic Paper 6	T6.05	The National Design Guide does not go far enough to provide wildlife friendly communities. The RSPB and Barratt Homes have worked together to provide a guide on new house building which should be considered as policy in the Action Plan evolves.
TP-030-052	Louise Gill	RSPB	Topic Paper 6	T6.06	A specific design code that must be followed to ensure the most environmentally friendly housing is provided.
TP-030-053	Louise Gill	RSPB	Topic Paper 6	T6.07	Identify areas solely for wildlife (excluding people and dogs).
TP-030-054	Louise Gill	RSPB	Topic Paper 6	T6.09	Thoughts have gone into school provisionbut not pre-schools. The area is seriously lacking in spaces available for pre-school and the new housing will only mke this matter worse so should be planned into the development. The environmental features should be managed appropriately and some more sensitive environments will require the exclusion of people and dogs.
TP-030-055	Louise Gill	RSPB	Topic Paper 6	T6.10	Approaches B or C are favourable. The sole aim of a private company is to make money which means that the places and spaces won't have all the money put back into them unlike a charity or local Council.
TP-030-056	Louise Gill	RSPB	Topic Paper 6	T6.12	Advanced manufacturing / transport and storage are less favourableas large warehouse and industrial buildings will not fit in with the overall designs of the wider area.
TP-030-057	Louise Gill	RSPB	Topic Paper 6	T6.13	Approach C is preferred. Where it is not identified in overall terms it could lead to inappropriate buildings / businesses for the area.

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TP-030-058	Louise Gill	RSPB	Topic Paper 6	T6.17	Yes, this is needed to reduce travel requirements in vehicles. Places to buy essentials will be useful.
TP-030-059	Louise Gill	RSPB	Topic Paper 6	T6.18	Currently there are limited foodstore options in South Lanaster. This requires residents to travel into Lancaster to undertake normal food shopping. Therefore a foodstore is a necessity to reduce travel.
TP-030-060	Louise Gill	RSPB	Topic Paper 6	T6.19	Approach B is preferable. The area needs to accommodate all local needs including doctors to ensure a reduction in travel needs.
TP-031-001	Simon Bibby	N/A	Topic Paper 1	T1.01	No
TP-031-002	Simon Bibby	N/A	Topic Paper 1	T1.02	No
TP-031-003	Simon Bibby	N/A	Topic Paper 1	T1.03	Not relevant as I do not agree with any further development.
TP-031-004	Simon Bibby	N/A	Topic Paper 1	T1.04	No, there has already been too much development in South Lancaster and the character and virtue of the area will be completely be destroyed if development continues.
TP-031-005	Simon Bibby	N/A	Topic Paper 1	T1.05	No
TP-031-006	Simon Bibby	N/A	Topic Paper 1	T1.06	I do not agree with the 'Broad Location for Growth' .
TP-031-007	Simon Bibby	N/A	Topic Paper 1	T1.07	No
TP-031-008	Simon Bibby	N/A	Topic Paper 1	T1.08	No
TP-031-009	Simon Bibby	N/A	Topic Paper 1	T1.09	No
TP-031-010	Simon Bibby	N/A	Topic Paper 1	T1.10	I find the name 'garden village' nothing but a cheap euphemism for senseless urban sprawl.
TP-031-011	Simon Bibby	N/A	Topic Paper 1	T1.11	No
TP-031-012	Simon Bibby	N/A	Topic Paper 1	T1.12	No
TP-031-013	Simon Bibby	N/A	Topic Paper 1	T1.13	No
TP-031-014	Simon Bibby	N/A	Topic Paper 1	T1.14	In agreement with the vast majority of South Lancaster residents I am not in agreement with any further housing or commercial development in the area.
TP-032-001	Tracey McNamara	N/A	Topic Paper 2	T2.01	No. It is not taking into account the wider infrastructure and network of local roads. If this plan goes ahead, the traffic in local communities and villages just increases. Local roads to the South and around Cockerham are already rat-runs which have excessive car and HGV use. This proposal is just going to exacerbate problems and cause more danger on our roads. If they built a bypass between Bailrigg to Glasson Docks to stop HGV movements perhaps this would be an answer.
TP-032-002	Tracey McNamara	N/A	Topic Paper 2	T2.02	No. It is not taking the bigger picture into account in terms of road deaths.
TP-032-003	Tracey McNamara	N/A	Topic Paper 2	T2.03	The Council should be listening to more of the local community, Local MPs and campaigning from the Parish Council.
TP-032-004	Tracey McNamara	N/A	Topic Paper 2	T2.04	A Bailrigg to Glasson Dock bypass is needed.
TP-032-005	Tracey McNamara	N/A	Topic Paper 2	T2.05	A Bypass between Bailrigg and Glasson Dock is needed to alleviate HGVs on country lanes and through local villages.
TP-032-006	Tracey McNamara	N/A	Topic Paper 2	T2.08	Why bespoke?
TP-032-007	Tracey McNamara	N/A	Topic Paper 2	T2.14	Infrastructure of all new homes on drainage, flooding, farmland and countryside animals, pollution, increased traffic. Safety of walkers should be considered.
TP-033-001	Graham Lamb	Pegasus Group on behalf of Highgrove Strategic Land Ltd	Topic Paper 1	T1.01	Whilst the evidence base looks comprehensive it would be useful for the Council to clarify if these will be consolidated into an overall 'Site Selection Paper' to demonstrate how all land in the Action Plan area has been assessed and appraised into allocations within the Action Plan.
TP-033-002	Graham Lamb	Pegasus Group on behalf of Highgrove Strategic Land Ltd	Topic Paper 1	T1.02	The Council have an established vision to create a sustainable place to live and work in South Lancaster. Whilst we support the broad principles of the vision, there are no details regarding the approach and types of employment opportunities which are to be provided.
TP-033-003	Graham Lamb	Pegasus Group on behalf of Highgrove Strategic Land Ltd	Topic Paper 1	T1.03	Objective 6 which seeks to support economic prosperity is welcomed and aligns with Policy SG1. If the Action Plan wants to be truly flexible and attract a wide range of business, it must support the full range of employment needs, including larger format logistics and warehouse floorspace to maximise the economic benefits offered by the supporting infrastructure and improved highway links. Objective 2 should be strengthened to reflect te importance of all the road infrastructure, including the Junction 33 reconfiguration which is not sufficiently mentioned.
TP-033-004	Graham Lamb	Pegasus Group on behalf of Highgrove Strategic Land Ltd	Topic Paper 1	T1.04	We believe that the Action Plan should include the full length of the proposed M6 Link Road, given the importance it has to Policies SG1 and SG3.
TP-033-005	Graham Lamb	Pegasus Group on behalf of Highgrove Strategic Land Ltd	Topic Paper 1	T1.05	We agree that Approach B is the most appropriate starting point in tems of delivery timescales in line with national planning guidance. However, we note the rationale is solely based on the delivery of housing and a residential build rate. We have no issue wiht the residential build rate as a worst case scenario, however the Action Plan must not use this to apply any sort of phasing that restricts development coming forward sooner.
TP-033-006	Graham Lamb	Pegasus Group on behalf of Highgrove Strategic Land Ltd	Topic Paper 1	T1.06	We have no specific issue with the 3,500 quantum figure given its basis in Policy SG1, however this should be supported by some sort of quantum figure relating to employment land based on Policy SG's approach to employment / job creation.
TP-033-007	Graham Lamb	Pegasus Group on behalf of Highgrove Strategic Land Ltd	Topic Paper 1	T1.09	It is our strong view that the Action Plan should seek to allocate land for the full range of employment purposes, including small scale and larger scale opportunities. Whilst we note that the Council's recent 'Economic Prosperity Study' includes that the Garden Village does not need to be supported by large format B2 and B8 uses, on the basis there are better places to deliver such uses. We have several concerns with this, firstly in respect of labour supply of the Council is committed to sustainability it should take every opportunity to locate new homes close to new employment, failure to do this may increase the need to travel. Secondly, in terms of the existing supply there is conflicting evidence in the Council's most recent 2021 Annual Monitoring Report which confirms there has been a significant reduction in the number of planning application which would result in new employment floorspace. The Council point to wider macro-economic challenges and whilst we do not dispute this view, recovery has been stronger elsewhere in the region which suggests that supply in this area is constrained. Thirdly, there are questions over the viability of small scale employment delivery and they tend to be only commercially viable in specific locations and circumstances. The papers fail to take account for the important role that new employment sites along the route of the link road that can play in heling to deliver that infrastructure.

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TP-033-008	Graham Lamb	Pegasus Group on behalf of Highgrove Strategic Land Ltd	Topic Paper 1	T1.10	Given the large area which is covered by the Action Plan and the scale of housing proposed, a single centrally located centre may not be the most appropriate or sustainable solution. Indeed, two smaller centres distributed through the area could offer a more sustainable alternative.
TP-033-009	Graham Lamb	Pegasus Group on behalf of Highgrove Strategic Land Ltd	Topic Paper 2	T2.03	Significant road infrastructure improvements area need to deliver growth in this area, most notably the delivery of the new motorway junction and spine road. We consider Junction 33 to be a key asset to the Action Plan areas with a valuable opportunity to deliver employment sites with excellent connections to both development and the motorway network. Development of this road infrastructure provides an opportunity for the allocation of employment sites on residual sites neighbouring the link road post completion. The existing evidence fail to properly acknowledge and support this crucial infrastructure and this must be addressed as the Action Plan process moves forward.
TP-033-010	Graham Lamb	Pegasus Group on behalf of Highgrove Strategic Land Ltd	Topic Paper 6	T6.01	<p>It is important to note the planning status of the JTP Masteprlan which is not a formal Developent Plan or Supplementary Planning Document. It has not been tested at examination giving it limited weight and meaning it will be superseded by the Action Plan. The JTP Masterplan does not cover the entire Action Plan area. Clearly the Masterplan is no a robust starting point for the full Action Plan area.</p> <p>The Masterplan includes broad principles regarding the role of employment but does not make reference to the importance of dedicated employment allocaitons. We believe that opportunities exist for the allocation of employment land within areas outside of the JTP Masterplan which is supported by the direction of Policy SG1.</p>
TP-033-011	Graham Lamb	Pegasus Group on behalf of Highgrove Strategic Land Ltd	Topic Paper 6	T6.12	The Topic Paper considers a range of employment sectors over the lifetime of the Action Plan including advanced manufacturing, transport / storage and professional / private services. We welcome the broad range of employment sectors identified which will require a flexible approach to meet the needs of South Lancaster moving forward. A range of B2 and B8 uses should be considered suitable - the range of employment sites in the adopted Local Plan are considered unsuitable for delivering a full range of modern business needs. The allocation of sites in the Action Plan area offers the opportunity to provide deliverable employment sites to meet future employment needs in the District.
TP-034-001	Andrew Leyssens	United Utilities	Topic Paper 5	T5.03	<p>It is important to ensure that the approach to flood risk management and masterplanning ensures that any on-site flood risk from the public sewer system is understood and avoided. Whilst all forms of sewer flood risk are referenced in the topic paper we wish to emphasise that the approach to flood risk assessment and masterplanning must take account of flood risk from all sources including flood risk from public sewers. Details of this approach are set out in paragraph 161 of the NPPF and within Planning Practice Guidance.</p> <p>We have reviewed the boundaries for the Action Plan area and wish to note there are areas of the site where there are existing public sewers within or near to the area which are predicted to be at risk from flooding and/or sites where there is a record of previous flooding from the public sewer. This flood risk should be avoided in accordance with national policy. We would welcome the opportunity to liaise with your external consultants on any sewer flood risk that exists. We would seek to ensure that any flood risk is avoided via the preparation of the Action Plan, however it would be prudent to ensure the Plan includes an appropriate policy provision to manage the risk of sewer flooding. Example wording is provided within the full response.</p> <p>We recommend that the flood risk assessment assesses the impact of reservoir flood risk on development in the Action Plan area. Our initial review suggests that this principally affects land to the east of the M6 and a small area to the wet of the motorway. In the first instance this risk would be most appropriately avoided, thereafter development will need to address any increase in cost to the reservoir operator as a result of development occuring downstream of the reservoir. In such circumstances, which we recommend are avoided, you would need to ensure that policy appropriately address the matter.</p>
TP-034-002	Andrew Leyssens	United Utilities	Topic Paper 5	T5.04	Yes, we support the Council's approach.
TP-034-003	Andrew Leyssens	United Utilities	Topic Paper 5	T5.05	<p>In the first instance, the view of United Utilities is that the surface water should discharge to an alternative to the public combined sewer. We see no reason why this should not be the case on an area such as South Lancaster. Our expectation is therefore a foul connection to the public sewer. In seeking to secure a foul only discharge to the public sewer, it will be critical that the necessary discharge rights to nearby water bodies are secured. We wish to emphasise tha policy should ensure a co-ordinated approach to infrastructure delivery. This should be allocation-wide and not fragmented as result of land ownership which would lead to sub-optimal approaches to surface water management.</p> <p>With regard to foul management, co-ordinated approach is equally applicable in the context of the delivery of sustainable development. The strategy for drainage should ensure that the need to pump water is minimised and if pumping is necessary, a proliferation of foul water pumping stations should be minimised. With regards to the reduction of flood risk, we would welcome the opportunity to work with the Council on the drainage strategy to consider whether development presents an opportunity to remove surface water from the public sewer system.</p>
TP-034-004	Andrew Leyssens	United Utilities	Topic Paper 5	T5.06	This ultimately a matter for the Council to consider, along with the LLFA and Environment Agency and potentially the Canal and River Trust dependent on the receiving body, for example the capacity of any culverts. In order to meet the requirements of planning policy, flood risk must not increase. The key requirement of United Utilities is ensuring no surface water discharges to the existing public sewer.
TP-034-005	Andrew Leyssens	United Utilities	Topic Paper 5	T5.08	<p>We would welcome the opportunity to discuss the difference between Approach A and B with the Council. We can concerned with the reference to 'indicative areas' and that Approach B may not provide sufficient clarity to the overall approach to surface water management / flood alleviation. Areas of existing flood risk must be clearly identified and avoided alongside a clear strategy for managing water and flood risk from all elements and development.</p> <p>This will be critical to ensure that each phase understands its role in delivering a co-ordinated approach to the delivery of drainage and flood risk management infrastructure. In this regard, the design of the new road infrastructure must be linked to the drainage and flood management across the site and the strategy to deliver new infrastructure. The new road could be a conduit for new foul, surface water and clear water infrastructure and this needs early and careful and consideration.</p>
TP-034-006	Andrew Leyssens	United Utilities	Topic Paper 5	T5.09	Yes we are supportive of the principles in the JTP Masterplan insofar as they relate to drainage. In accordance with our submissions to the Partial Review of the Local Plan, it is critical that careful consideration is given to the efficient use of water. We believe that the optional standard for water use in Building Regulations should be the minimum requirement.
TP-034-007	Andrew Leyssens	United Utilities	Topic Paper 5	T5.10	<p>Yes. An over reliance on traditional piped and tanked storage systems should be identified as not acceptable in policy terms.</p> <p>Development in this area is an excellent opportunity to plan for development with a high quality design. Sustainable drainage which reflects the 4 pillars of sustainable drainage is a key component of good design outlined in Building for a Healthy Life. A multi-functional approach to sustainable drainage should be clearly outlined in the GBI strategy and allocation-wide drainage strategy.</p>
TP-034-008	Andrew Leyssens	United Utilities	Topic Paper 5	T5.11	We are supportive of the Council's approach to implement Approach A. Policy DM34 sets a district-wide policy but expectations in South Lancaster should be different, for example stronger controls on the discharge of surface water into the public sewer.
TP-034-009	Andrew Leyssens	United Utilities	Topic Paper 5	T5.12	We believe sustainable drainage component which is multi-functional in nature and seek to maximise the retention of surface water and are fully integrated. You may want to consider whether there are water re-use opportunities such as grey water recycling which may be more suited to particular types of development. We recommend the approach to drainage and landscaping is intrinsically linked through policy which should include exploring the opportunity presented by tree-lined streets to incorporate bio-retention tree pits within the design of development.
TP-034-010	Andrew Leyssens	United Utilities	Topic Paper 5	T5.13	We would welcome the opportunity to discuss this matter with you further. Initial thoughts are that there is extensive guidance available which would be of assistance on this matter.
TP-034-011	Andrew Leyssens	United Utilities	Topic Paper 5	T5.14	We believe that Approach A is the most appropriate way forward as this is in the best interests of the delivery of development which fully incorporates the principles of multi-functional sustainable drainage and high-quality design.
TP-034-012	Andrew Leyssens	United Utilities	Topic Paper 5	T5.15	Ultimately the approach to management and maintenance is a matter for the local planning authority and the developer. Our key message is that there should be a clear framework for managing and maintaining all drainage components. We would wish to emphasise that any approach to management and maintenance should include on-site sustainable drainage systems after development takes place. It is our strong preference that management and maintenance of on-site watercourses are not left to fragmented ownerships but rather a co-ordinated management approach.

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TP-034-013	Andrew LeysSENS	United Utilities	Topic Paper 5	T5.16	Further issues to raise include: - The production of an Allocation-wide Strategy and rights to discharge to water bodies, consistent with the Environment Act 2021. Further information is provided on this as part of the full response. - Separate Settlements would present a potential infrastructure challenge and emphasises the importance of considering the opportunity for strategic infrastructure links via the new road infrastructure. - With regard to water efficiency, it is critical that any approach to water management includes this matter. - It is important to note that issues can arise when development is brought forward in close proximity to United Utilities assets, such as waste treatment works, pumping stations and overflows which can result in odour, noise and vibration issues. We would not wish to see development encroach around such assets, for example the waste water treatment works to the west of the Action Plan area.
TP-035-001	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.01	There are a number of items of evidence which remain ongoing or still to be commissioned, what if one of those assessments reveals an issue which might alter the focus or extent of the Area Action Plan? There does not appear to be anything in this evidence list relating to the provision of education or health facilities. Likewise there is little or no mention of a sewerage strategy and the implications on the Stodday Treatment Works. Furthermore, the Parish Council are aware of the geographical constraints to expansion and would oppose any expansion which would have an adverse impact on the surrounding countryside, especially the wooded area on the eastern border of the area.
TP-035-002	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.02	It is difficult to argue with the broad themes of the vision, however we would argue with the central premise that a development of the size of the garden village is required. The enormous environmental impact of the project and the massive and still spiralling costs involved in the delivery of infrastructure are just two reasons for our ongoing opposition to the development.
TP-035-003	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.03	It is difficult to argue with the objectives in themselves, however the task of implementing them in the context of national and local economic challenges and the lack of enforcement to require developers to build these standards is likely to make many of them unachievable. Again, until an evidence is in place surely it is difficult to say whether these represent achievable objectives?
TP-035-004	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.04	Objectives 1 and 4 refer to the creation of the garden village from existing settlements. The Action Plan is therefore already too late in this regard as developers are applying for planning permission on land which could be incorporated into the 'Green Halo'.
TP-035-005	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.05	Preference for Approach A.
TP-035-006	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.06	Preference for Approach B.
TP-035-007	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.07	We struggle to understand how the various numbers quoted in the draft Topic Papers were arrived at and, critically, what is the final agreed number and how it was calculated. Even allowing for the removal of the southern area of the projected development in the JTP Masterplan, there are still a variety of figures in this document from 2,500 to 4,300 homes (Local Plan) to 5,000 homes (Masterplan). This is set against the requirements of the HIF bid to deliver around 9,000 homes.
TP-035-008	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.08	The Council's approach seems sensible, however given the pressure on water services and flood mitigation Approach C ultimately might have to be implemented.
TP-035-009	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.09	Hard to disagree with the proposed mix although the likelihood of high costs and developer unwillingness to build affordable housing makes this an aspiration rather than a likely end-point.
TP-035-010	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.10	Yes, employment opportunities should be an integrated part of any development. Employment development should be sustainable and not attract high levels of traffic flows to add to existing transport problems.
TP-035-011	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.11	We support Approach B. Existing settlement should have their character and environments protected from development. As a parish on the western boundary of the Action Plan area we would also strongly support an area of separation to the west (i.e. east of the A588) as a number of dwellings and businesses in the Parish would have noise and visual impacts. We would wish to be consulted on the design and siting of these areas of separation.
TP-035-012	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.12	Our comments are based on the principles that we do not believe that development in South Lancaster should be anything like the scale being proposed. We would not wish to see any additional development on Whinney Carr or Bailrigg Lane, however if these are to be included in the Action Plan then at least any development should have to comply with the design principles of the garden village. Regarding Whinney Carr, if the garden village is built would this land not be in the proposed 'Green Halo'?
TP-035-013	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.13	Agree, although phasing will in all likelihood come down to delivery of infrastructure and money rather than planning principles.
TP-035-014	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.14	The maps presented in this Topic Paper are out of date. For example, we know that the latest plans from Lancashire County Council show roads and a Park & Ride facility in different locations. The paper needs to show the most up-to-date maps and plans in order for respondents to make informed comments.
TP-035-015	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 2	T2.03	Both the reconfiguration of the motorway junction and new road are identified as critical elements of infrastructure in the Topic Paper. Policy SG3 of the Local Plan make clear that infrastructure delivery is instigated at an early stage and the Parish Council expect this principle to be upheld. Although we appreciate that the Local Plan evidence prepared by White Young Green (WYG) considers only projected traffic flows, it does highlight the constraints along the A6. Our understanding of this work is that it only considers traffic flows without traffic from the garden village and that further assessment work will need to be undertaken to evaluate this. We do not believe that the underpass of the West Coast Mainline can be achieved in the timescales proposed by Lancashire County Council, let alone the proposed new road through the Action Plan area and that it may exceed the proposed timescales by a number of years. Construction of the new road is therefore likely to commence at the north and that construction traffic will have to use the existing road network, particularly making use of Pointer Roundabout. We trust therefore that improvements to the various junctions on the A6, including Pointer Roundabout and junctions to the south will be completed before significant construction related to the garden village (including the road itself) has begun. Whereas these issues are of general concern to the wider city, the indirect effects, should these issues not be resolved, are likely to be severe to our Parish. This Topic Paper fails to address the impact on the garden village on the A588. We would draw your attention to the various bottlenecks along this road in addition to the Pointer Roundabout, specifically at the pinchpoint at Royal Albert Cottages and congestion at Riply High School. There are also issues of dangerous bends along the whole length of this road.
TP-035-016	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 2	T2.06	With regard to the BSIP, we are largely a rural parish with no direct access to public transport and are therefore dependent on car use and this is unlikely to change. The transport evidence for the Local Plan does not consider the introduction of bus lanes at the Pointer Roundabout. There appears to be little scope for providing additional lane(s) for this purpose. Desirable as bus lanes may be, the Parish Council are concerned that this could restrict traffic and create rat-running through the parish.
TP-035-017	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 2	T2.07	Figure 6.2 suggests a cycleway along the A588, bounding the western side of the garden village. We would be interested as to how this will be integrated into the A588 as this is already a dangerous route for all road users. Figure 6.3 suggests a cycle 'superhighway' through Stodday, presumably from the Lune Estuary path. The lane from Stodday to the A588 is narrow for both cars and cycles so it would be unwise to encourage cyclists to use this route.
TP-035-018	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 4	T4.02	WE have no particular comment on improvements other than, having gone through the preparation of a Neighbourhood Plan we are very conscious of the need to protect the historical environment, including appropriate design codes.
TP-035-019	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 4	T4.05	Approach B is preferred.
TP-035-020	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 4	T4.07	We find the concept of +10% net biodiversity difficult to understand in the context of such a large development but trust this is achievable. It seems likely that such gains will have to be off-site and, as such, considering the constraints to the east of the Action Plan area and our proximity to the Lune Estuary may well impact on our Parish. Whereas we would welcome increased biodiversity we would welcome involvement in this aspect, such that any changes are not detrimental to our parishioners.
TP-035-021	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 4	T4.10	We agree that the correct handling of soils and development will not only be ecologically beneficial but that retention of soils on site and minimising soils which are sent to landfill will be of benefit to the wider area.
TP-035-022	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 4	T4.11	Approach C is preferred.

APPENDIX A: LANCASTER SOUTH AREA ACTION PLAN - SUMMARY OF ALL RESPONSE TO TOPIC PAPERS (RESPONDER ORDER) - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-035-021	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 4	T4.12	In allocating green spaces which are distributed throughout the garden village we are concerns that the resultant smaller parcels of land will be unsuitable for agricultural use. This could lead to the break-up of these parcels into even smaller units. Whereas this may be desirable for some land-uses such as orchards and allotments, this can also lead to unsightly development and unauthorised semi-permanent residential development.
TP-035-022	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 5	T5.00	Topic Paper 5 has little impact on our Parish and therefore we have limited input on this issue. However, in general terms we wish to be assured that the various comments received from representatives attending Parish Liaison Events are considered, in particular knowledge of local flooding issues.
TP-035-023	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.03	Agree that design issues are of primary importance. Workshops on this matter would be useful but unless the thoughts of local people are properly taken into consideration then they would be a waste of time. Workshops would help create an understanding of the specific housing of particular groups with special needs to make sure accommodation is fit for purpose from the outset. Design Review Panels incorporating a range of local people would be a good idea.
TP-035-024	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.04	It is difficult to argue with the high-level principles described although we would like to see a fuller explanation of Point 8 which refers to the country hamlets. Further principles could be added around the availability and proximity to education and health facilities. Principles 1, 2, 3, 7 and 8 are of particular interest to the Parish.
TP-035-025	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.05	Agree, characteristic 10 relating to homes and buildings is silent on environmental impact. Perhaps a note could be added to strengthen specifics about aspiring to Passivhaus- standard homes as put forward in Topic Paper 3.
TP-035-026	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.06	Preference for Approach A. The production of a well research and well written design code will seek to secure high standards and consistency throughout new development whilst still allowing for change in construction techniques and emerging technologies over time.
TP-035-027	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.07	Agree with all core aspects. Assumption that pre-school care / education will come in the education provision although there is no mention of this in para 5.7. Also there is no mention of provision of services for older people, for example extra care / nursing home.
TP-035-028	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.08	The key national providers are included but would it not be useful to identify more local providers of key infrastructure, such as dental care providers or Lancashire County Council Public Health team? There is also no representation from the voluntary sector, a lot of recreation is provided by the voluntary sector which might require facilities from which to operate. Finally, shouldn't food providers / supermarkets be included as infrastructure providers?
TP-035-029	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.09	<p>Whilst consultation with NHS England and local medical practice is an absolute must, possibly overview service provision with the support of Lancashire County Council Public Health team might be prudent. There will be a need for new health facilities, no investigation is needed other than to understand what those needs are so the statement should be a more positive commitment to the health of the residents. The risk will otherwise be financial pressures that drive the delivery rather than a vision of what is required.</p> <p>With regard to education provision, how the City Council know that the two proposed primary schools will be sufficient. How is projected provision calculated?</p> <p>Given this is an opportunity to shape a new community, there is possibly a moral imperative that the plan is visionary and adds to the lives of the people who are resident there. It would shameful if plan became a way of addressing current issues because of financial imperatives rather than using it as a way to plan properly.</p>
TP-035-030	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.10	On the basis of the arguments put forward in this paper, our preference would be Approach B. As the Topic Paper suggests, it is likely that in the initial years, before a sizeable community is established, that some form of City Council support and governance will be required.
TP-035-031	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.11	<p>A key ambition should be that the garden village should be a thriving place to work, not to commute from and this should be expressed clearer within the Topic Paper. We think it is highly unlikely that development here will create sufficient employment opportunity to discourage commuting. It is inevitable that a significant proportion of homeowners will commute will commute to either Lancaster City Centre or, more likely outside of the district. The building of a new motorway junction seems to support commuting opportunities.</p> <p>As there may be fewer opportunities to work in the garden village, investigating how new development can support the working population of Lancaster should be explored, ensuring new housing meets their needs. Housing needs to be available for all sections of the community and should be adaptable for their entire lifetime.</p> <p>Provision should also be made for homeworking opportunities and hot-desking within new development.</p>
TP-035-032	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.12	There economic sectors listed are reasonable. There is an issue with the data. The DLP Strategy Report makes use of data from Summer 2022 and was produced before the latest economic downturn. This data and its implications should be re-investigated.
TP-035-033	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.13	Probably Approach B or C, however the data needs to be reviewed in light of recent economic events.
TP-035-034	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.14	Figure 8.1 is trying to address two issues and is therefore unclear, in terms of housing mix only the first two columns are applicable. The affordable housing column should be moved into a new table. Looking at the percentage mix, should the figure for flats / apartments not be higher than 10%, particularly as 2-bedroom houses are only 20%? In addition, specific types of housing which will be important for a sustainable community are missing, specifically supported accommodation for the elderly and those with additional health needs.
TP-035-035	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.15	30% is a good starting point, the question is whether developers will find a way of getting round building affordable homes due to building conditions, profit margins etc.
TP-035-036	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.16	Broadly agree. Provision for care of the elderly and those with particular needs should be an important feature of any development of this scale. Community-led housing is also encouraged.
TP-035-037	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.17	There must be a local centre providing shops and services This is particularly important for those with young families, people with disabilities and older people who may not be able to access services outside the village. Typical services should include health centre, post office (not just a post box), newsagent, grocery shop, bakery, greengrocer, butcher, cash machine, barber / hairdresser, DIY shop.
TP-035-038	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.18	It would be a shame if a large supermarket took business away from the community-led local centre. Any large foodstore would need to complement, rather than compete against, local stores.
TP-035-039	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.19	Approach B seems the most sensible. Approach C would lead to even greater traffic flows and environmental impacts.
TP-036-001	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.01	There appears to be no specific evidence base for a strategy for education and healthcare provision, including the development of Lancaster University, renewable energy generation, improvements to the footpath / bridleway network, a railway strategy and a strategy for securing a skilled workforce.
TP-036-002	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.02	The vision for the garden village is generally laudable but must be strengthened by specific comment on the type and quality of work and employment that will be developed within the garden village to reduce traffic and make it an attractive location for people to live and work. The vision needs to prevent new development becoming a commuter suburb with residents working outside the district. Whilst the vision refers to creating a distinct sense of place, it is important that the vision makes clear that the garden village will be 'forever a distinct village set in a rural landscape, visually and physically separate from the urban edge of Lancaster City'.

APPENDIX A: LANCASTER SOUTH AREA ACTION PLAN - SUMMARY OF ALL RESPONSE TO TOPIC PAPERS (RESPONDER ORDER) - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-036-003	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.03	<p>We note that the 7 objectives are not the same as the 8 principles contained in the JTP Masterplan and in many ways are clearer and more specific However, there are gaps in terms of their relationship to Policy SG1 including:</p> <ul style="list-style-type: none">- Objective 1 refers to a Burrow Beck corridor. The risk is that this corridor ends up too narrow and squeezed by development and therefore we suggest re-referencing this area to refer to the Burrow Beck Strategic and Green Valley.- Objective 2 ignores exisring communities and properties that also need strong digital connections. It is an important principle that existing communities benefit from the same infrastructure standard applied to new development including digital connectivity, flood alleviation and appropriate speed limits.- Objective 4 refers to green gaps between South Lancaster and Galgate wheras SG1 makes specific reference to Bailrigg Village, this must be retained. Secondly, reference to 'gaps' is weak and inconsistent with Policy SG1 which refers to distinct areas of separation.- Objective 5 is let down by weak committment and needs to be more assertive and demanding in places. Langauge should use more 'wills' and 'musts'.- Objective 6 makes fleeting reference to Lancaster University and is insufficient representation of Policy SG1 principles IX and X which place must more emphasis on protecting and enabling University benefit.- Objective 7 does not make it clear that commercial developers share responsibility for ensuring infrastructure is in place before new homes are occupied. The principle must be explicit that development should not be occupied until they are accessible to schools, health care and community facilities.- Objective 7 goes beyond SG1 Principle VIII in that it recognises the need for an agreed strategy towards stewardship. This is welcomed but need to ensure that garden village does not straddle existing parishes and wards.
TP-036-004	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.04	<p>The Parish Council have consistently held the view that growth should be concentrated on the delivery of the garden village, it therefore does not support Approach B as this would result in less control of development between the Garden Village and South Lancaster, eroding important green space,</p> <p>The advantage of Approach C is that it can include future extension of the garden village and exclude the land to the East which is poorly connected. The disadvantage of this approach is that it could provide land for development which may never be needed.</p> <p>Therefore, the geographic scope provided by Approach A would be preferred provide that the future potential direction of development was to the south west of the canal, as per the vision of JTP Masterplan. This approach may rely upon broad assumptions being documented which ensure the delivery of longer term infrastucture and provide the community with a broad understanding of development direction beyond the current Action Plan.</p>
TP-036-005	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.05	<p>Approach B ensures that the Action Plan goes beyond the Local Plan period of 2031 and is of sufficient duration to see through the proposed quantum of development.</p>
TP-036-006	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.06	<p>The Parish Council have consistently backed the concept of a garden village, opposed to any urban encroachment. As such the Parish Council supports Spatial Option 1 of the 2018 consultation which identified the development of 2,500 new homes. The Council believe the Local Plan target of at least 3,500 new homes is a Westminster imposed housing target and should be disregarded. A 3,500 figure would require substantial development outside of the garden village which would undermine the viability of the garden village by diverting growth away from it. In addition, scattering development will increase the spend on infrastructure, consequently damaging viability. The Parish Council therefore propose that the quantum should be in the region of 2,5000 new houses, or if the geographic scope including a wider expansion area to the south west then the quantum should be in the region of 5,000.</p>
TP-036-007	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.07	<p>Approaches A and C are at the opposite ends of the spectrum and both are unrealistic. A balanced garden village should always have neighbourhoods of different densities and therefore Approach B is the only sensible approach.</p>
TP-036-008	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.09	<p>A critical part of sustainable developemnt is that is contains employment opportunities so that the residents do not need to travel long distances. The Parish Council wishes to see the Innovation Campus as a prime locations for employment. The Campus is only 25% developed and the University and City Council must work together to realise its potential. The University has expanded over the years but further expansion should not be as the cost of the unique character of Bailrigg and Ellel. In addition there should be commercial offices in the garden village as well as shops and places to eat, these should be flexible places. Although food production is to be encouraged there ought to be one or two industrial pockets which consist of small scale workshops. Coupled with home working, it would be helpful if the Action Plan had a target, say 50% of households within 2km of their employment.</p>
TP-036-009	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.10	<p>The JTP location for a local centre seems sensible. A second centre would be required for expansion west of the canal. The centre shoul include shops, commercial premises, community buildings, cafes and large open space for gatherings and markets serviced by bus stops and car parking. The latter should be a short walking distance from a primary school.</p>
TP-036-010	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.11	<p>The Parish Council agree with the conclusion of para 11.5.2 with the proviso that the areas of separatio explicity apply to existing settlements, notably Bailrigg Village, Lower Burrow and Burrow Heights as recognised in Policies SG1 and EN6 of the Local Plan. These areas should be substantial to give a sense of leaving one place and entering another and be visually separate. The description of Burrow Beck as a 'corridor' is inappropriate and should be referred to as a 'valley' to give a larger sense of scale for any area of separation proposed. The Parish Council believes that a conservative approach to areas of separation are required in the Action Plan because once an area is developed it is virtually impossible to reverse the loss of separation.</p>
TP-036-011	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.12	<p>The Parish Council agree that the Action Plan should assess all land within the SG1 designation for its value for development or for GBI potential. The Parish Council have consistently said that the planning application advanced by Gladman should be considered as part of the Area Action Plan as it relies on infrastructure which will only be delivered by that Plan. The Parish Council believe no urban extension areas should be identified until the garden village is fully implemented</p>
TP-036-012	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.13	<p>A phasing plan is vital, in the case of the Action Plan it is vital that the infrastructure is delivered before residential and commercial development otherwise there is no sense of place or community. The principal should be that new properties join a communtiy rather than site in a field where occupants have to drive elsewhere for amenities. It is recognised that some infrastructure may appear oversized until housing catches up and it is important that this is masked, for example roads built ahead of time should be masked by hedges.</p>
TP-036-013	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.14	<p>The Parish Council wish to see the Action Plan to include a process that equitably shares out the social costs and reasonable commercial profit amongst all landowners and developers so that all gain equally, regardless of what their land is being used for. This would incentivise developers to ensure that the Action Plan places the garden village and development where the Council(s) want it, ahead of any frantic competition to build as many houses as possible on their own patches of land.</p>
TP-036-014	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.01	<p>The 2016 Highways and Transport Masterplan is largely conceptual and has insufficient evidence of what is and will be the type and volume of transport needed in South Lancaster. The location of housing and employment must be assessed through the Action Plan to provide the necessary evidence for transport planning.</p>
TP-036-015	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.02	<p>There appears to be no specific evidence base for a strategy for education and healthcare provision, including the development of Lancaster University, renewable energy generation, improvements to the footpath / bridleway network, a railway strategy and a strategy for securing a skilled workforce.</p>
TP-036-016	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.03	<p>The impact on local roads from development will need detailed assessment and therefore the assessment described by the Council in 4.4.3 is necessary. This assessmnt must include specifically taking evidence from Parish Councils who have intimate knowledge of the locality.</p> <p>The motorway junction reconfiguration has already been modelled to show how traffic will increase by 60-70% at peak times along Hazelrigg Lane / Blea Tarn Road. This will pose significant challenges in terms of congestion, highway safety and usability for other road users.</p>

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TP-036-017	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.04	The BSIP represents a dilution of ambitions for sustainable travel movements, for instance the lose of the proposed bus rapid transit system. It is not clear that the BSIP factors in growth in traffic on the A6 and A588 associated with the garden village, innovation campus or Junction 33 improvements. Therefore the BSIP is useful but not comprehensive enough to be relied upon. As regard of missing connectivity, the current application for 680 houses north of Bailrigg Lane suggest that a bus route may be created between Hala Hill and Sir John Fisher Drive.
TP-036-018	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.05	Approach B is more sensible than Approach A because it recognises that traffic along the A6 and A588 corridors is driven more by new development in South Lancaster and benefits which will accrue to residents outside the Action Plan area. Approach C is our favoured approach because it keeps open the option for a railway station at Bailrigg.
TP-036-017	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.06	If one of the ambitions of the Action Plan is to demonstrate modal shift is achievable and not simply a concept then all realistic cycling provisions need to be considered. As such Approach C is preferred over Approach D because no car development is unrealistic and subsidising e-bikes is unaffordable. Approach C not only addresses the need for the garden village but alsos the existing barriers to cycling between the City Centre and the University.
TP-036-018	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.07	Approach B is the minimum necessary to make walking in the garden village attractive and the first choice of residents. However, wider benefits should be sought by addressing wider connectivity within the existing network and therefore Approach C is preferred. The extra features of Approach D are considered unrealistic and unaffordable. In supporting Approach C, the Parish Council would like to ensure that rural walking routes to the east of the M6 are considered. Securing routes in this area would ultimately allow the River Lune to be connected up to the Forest of Bowland which would be considered a valuable addition to the local network.
TP-036-019	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.08	It is unrealistic to ban cars but with the right attractive alternatives to car usage it is not unreasonable to limit car parking. However, the key issue is how to accommodate visitor parking and innovative bespoke solutions will be needed.
TP-036-020	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.09	It is unrealistic to ban cars (Approach D) but with the right attractive alternatives to car usage it is not unreasonable to limit car parking. Approach C promotes the modal shift of residents away from cars but the key issue is how to accommodate visitors parking.
TP-036-021	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.10	The definition is lacking. Modal shift will only occur when individuals find the benefits of not using private vehicles exceed that of using one. 'Promoting and giving primacy to alternative transport' will not work if using a car is more comfortable, convenient and cost effective. An alternative definition for modal shift is provided within the responders full response.
TP-036-022	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.11	The list is reasonable. The list of elements does not include disincentivising car usage in the city centre presumably because there are alternative transport options offered to residents of the garden vilage which are not universally available to other Lancaster citizens.
TP-036-023	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.12	The Action Plan is a key opportunity for Lancaster to demonstrate modal shift can achieve and contribute towards addressing the Climate Emergency. It will be relatively easy to set a overall target for the Action Pln but quite difficult to calculate the impat that any one initiative may have in comparison to others. Nevertheless, the Parish Council support Approach C.
TP-036-023	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.13	The Parish Council support Approach C.
TP-036-024	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.14	The Action Plan should also address the following points: - Speed limits within both new development and existing roads to improve safety. - Build in resilience to the local road network in case the underpass of the railway line floods. - Community taxis for citizens with mobility issues who do not wish to drive.
TP-036-025	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.01	There appears to be no specific evidence base for a strategy for education and healthcare provision, including the development of Lancaster University, renewable energy generation, improvements to the footpath / bridleway network, a railway strategy and a strategy for securing a skilled workforce.
TP-036-026	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.02	The Action Plan is likely to cover a longer timeframe than the Local Plan and therefore should be more ambitious in the context of the Climate Emergency and that which is set out via Approach B. Settin targets will focus the minds of developers and take the opportunity to incorporate renewable energy and energy storage as core features of new development. Therefore the Parish Council support Approach D. Approach E is not supported because there is no information on what unregulated energy is.
TP-036-027	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.03	Energy targets should be set to focus the minds of developers and eliminate ambiguity about what is required to achieve net zero. Consideration should be given to setting negative targets so that new development contribute to offsetting the carbon impacts of existing housing in the district.
TP-036-028	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.04	Consideration should be given to setting negative targets so that new development contribute to offsetting the carbon impacts of existing housing in the district.
TP-036-029	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.05	Only Approach C has ambition and commitment to the Action Plan making a step change in terms of building design. However, the Parish Council do not support the sentiment in para 4.6.1 which suggests differing design codes may be applied outside of the garden village, our position is that there should be a single high standard across all development.
TP-036-030	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.06	Whilst the Parish Council suppot the principle of renewable energy projects and landscape sequestration, we only do so to the extent that they contribute to offsetting to other parts of the district. The Action Plan should ensure that the net zero target for South Lancaster is achieved without recourse to carbon offsettin and therefore Approach A is endorsed.
TP-036-031	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.07	The Parish Council do not support a local carbon offsetting fund because (a) it implicitly allows development in the district not to be net zero which is a poor message and (b) such a fund would require administreation which is not an effective use of Council resources.
TP-036-032	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.08	Approach C is the closest to the Parish Council's position because it says design codes will be brought forward, whereas Approaches B and D merely refer to codes being encouraged.
TP-036-033	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.09	Given the question refers to a singular approach and yet the table in 4.12.4 includes 4 approaches, it is impossible to say which is the best one.
TP-036-034	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.10	It is important that non-residential development achieves net zero just as much as reidential development does. The Parish Council therefore supports as a minimum Approach C.
TP-036-035	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.11	The Parish Council agrees that non-residential development should go beyond the BREEAM Excellent standard in order to ensure net zero is achieved in the Action Plan area.
TP-036-036	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.12	The Partial Review resulted in considerably more robust and ambitious policies regarding water resilience which would make Approach A more acceptable. However, on the basis that the Action Plan will extend beyond the Local Plan, then it makes more sense to explore opportunities that go beyond that within the Partial Review and therefore Approach B is preferred.
TP-036-037	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.13	On the basis that the Action Plan will extend beyond the Local Plan, then it makes more sense to explore opportunities that go beyond that within the Partial Review and therefore Approach B is preferred. The Parish Council is disappointed that the first development to be approved at Lawsons Bridge does not meet these standards with large amounts of materials being imported to raise levels.
TP-036-038	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.14	The Action Plan is a unique opportunity for Lancaster to deliver large scale net zero development ahead of the Government's energy timetable and therefore fossil fuel is not supported and Approach B is preferred. The Parish Council is disappointed that the first development to be approved in this area - at Lawson's Bridge - has failed to meet such standards.
TP-036-039	Paul Holland	Scotforth Parish Council	Topic Paper3	T3.15	It is uneconomic to install gas infrastructure if it is to be abandoned within a few years therefore it makes sense for the Action Plan to be fossil fuel stationary energy free from day one.

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Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-036-040	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.16	Developing and operating an Energy Plan for the Action Plan area is a complex undertaking and it is unclear that it would be economic to achieve. Provided the policies have been set for net zero then the practical aspects of infrastructure planning can be left to the operators. Approach A is preferred.
TP-036-041	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.17	Provided the policies have been set for net zero then the practical aspects of infrastructure planning can be left to the operators. Therefore full Local Area Energy Planning is not supported, except for the consideration of heat networks in the garden village. Para 5.7.1 refers to the preferred approach being Approach D, however this does not exist.
TP-036-042	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.18	The consideration of heat networks is welcomed. Approach A is too passive but there is insufficient information to differentiate between Approaches B and C.
TP-036-043	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.19	The logical starting point is the Council undertaking a HNDU funded heat network feasibility study
TP-036-044	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.20	The Parish Council already have a renewable energy production within it and there have been tentative enquiries about community energy projects. Therefore, it is important that the AAP explores the land allocation for such projects and/or appropriate community benefit funds associated with commercial developers. Approach D is supported.
TP-036-045	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.21	The Action Plan area is predominantly rural. Whilst the Parish Council accepts that the garden village will be placed in the area it is important that the remaining surrounding rural environment allows for authentic food production rather than excessive parkland and therefore a balance of traditional farms / small holdings should be part of the Action Plan. It is therefore important that Areas of Separation provide such opportunities. The opportunities described in the Topic Paper relate mainly to arable farming but sufficient consideration should be given to livestock farming also.
TP-036-046	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.22	It is important that the garden village is set in a broad band of rural environment which includes opportunities for food production. Therefore Approach C is supported.
TP-036-047	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.23	The Parish Council have consistently states that the garden village will not be sucessfu unless there are a range of good local employment opportunities. The concept of community wealth is therefore very important. In that regard we wish to see a diverse range of employment provided in the locality.
TP-036-048	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.24	The Action Plan area includes Lancaster University which has already declared it wishes to be carbon neutral by 2030 and net zero by 2035. The Action Plan therefore needs to address how the University and Council's net zero plans both compliment and compete and how each can help each other achieve net zero. The role of tree planting in addressing Climate Change has not been addressed in the Paper.
TP-036-049	Paul Holland	Scotforth Parish Council	Topic Paper 4	T4.01	It is not clear that the current contribution of trees within the Action Plan area has been taken account as part of the evidence base.
TP-036-050	Paul Holland	Scotforth Parish Council	Topic Paper 4	T4.02	It is difficult to define what is of historic significance, this can be rather subjective. It would appear that ancient historic has been covered in the archaeological assessment but more recent history may require an alternative approach.
TP-036-051	Paul Holland	Scotforth Parish Council	Topic Paper 4	T4.03	The Parish Council broadly agree with the 8 design principles set out in the JTP Masterplan which should be applied across the whole Action Plan area. These principles will ensure that development is focused on creating a vibrant garden village and that any other development resembles countryside hamlets.
TP-036-052	Paul Holland	Scotforth Parish Council	Topic Paper 4	T4.04	The Parish Council considers the Sensitivity Assessment to be helpful and its broader recommendations are generally supported. The recommendations are wide-ranging and the Parish Council would not wish to see any recommendation diluted or not fully followed because other recommendations are deemed to be of a higher priority. It should be noted that the Parish Council have begun work on their Neighbourhood Plan (NP) which will consider existing land forms in the area and the removal / arrival of soils to raise levels. The enhancement of polices to address the NP groups concern on these matters could be made through the Action Plan and/or NP.
TP-036-053	Paul Holland	Scotforth Parish Council	Topic Paper 4	T4.05	The Parish Council have consistently stated the critical importance of Areas of Separation for the Action Plan area and garden village development. The JTP principle of a 'Green Halo' is supported as a mechanism for re-establishing woodland which has multi-functional purposes. However, the 'Green Halo' must be seen as part but not the whole of the JTP principle of 'Green Buffers'. The Parish Council does not consider a 'Green Halo' to provide sufficient buffers between development and would not represent a sufficient element of land for Area of Separation. The Parish Council consider Approach C to be the most appropriate.
TP-036-054	Paul Holland	Scotforth Parish Council	Topic Paper 4	T4.06	The Parish Council consider Approach B to be the most appropriate because it applies the same defintions around local landscape designations as those identified in the adopted Local Plan. The Parish Council would wish to see the area along the western side of the M6 remain open as part of a local landscape designation. In additional Approach B will allow the flanks of Whinney Carr to be fully evaluted in the context of the Action Plan.
TP-036-055	Paul Holland	Scotforth Parish Council	Topic Paper 4	T4.07	The Parish Council prefers Approach A with the objective of identifying and protecting key wildlife species within the Action Plan. Wherever possible key species should be protected in their existing habitats and locations. Where this is not possible then relocation should be sought within the Action Plan area. The Parish Council were disappointed that the first application to be permitted in this area have not sufficiently met these standards.
TP-036-056	Paul Holland	Scotforth Parish Council	Topic Paper 4	T4.08	The Parish Council believe that the Action Plan should set higher standards than those set by Central Government on the basis that the local Council has a better understanding and commitment to Biodiversity Net Gain and therefore Approach B is supported.
TP-036-057	Paul Holland	Scotforth Parish Council	Topic Paper 4	T4.09	The Parish Council believe there is no justification for Approach E whereby proposed Biodiversity Net Gain is offset. The Parish Council recognise that there may be some sites in the Action Plan area which may struggle to achieve Net Gain but they should simply partner with other landowners whose areas have been designated for GBI. The Parish Council therefore reject Approaches A and B. Approaches C and D are the only ones which the Parish Council can support, Approach C put the onus on the landowners whereas Approach D places the onus on the Action Plan itself. Approach C is the preferred with the provision that Net Gain is clearly secured via planning condition.
TP-036-058	Paul Holland	Scotforth Parish Council	Topic Paper 4	T4.10	The Parish Council are pleased to see the principle (b) of engagement with local communities and consider the discussion topics to be part of that process. The purpose of the Action Plan is to produce a comprehensive and cohesive plan for the foreseeable future and the Parish Council expect soil management to be determined in the Action Plan, including through design codes.
TP-036-059	Paul Holland	Scotforth Parish Council	Topic Paper	T4.11	The Parish Council have consistently supported the concept of a comprehensive and cohesive Action Plan which ensures a high quality of GBI. The Parish Council have consistently objected to piecemeal planing applications that do not support that comprehensive picture. The Parish Council have no faith in developers making positive decisions over GBI. Therefore the Parish Council endorse Approach D whereby land is allocated for GBI in the Action Plan and Approach E whereby GBI standards are set higher in the Action Plan than those in the Local Plan.
TP-036-060	Paul Holland	Scotforth Parish Council	Topic Paper 4	T4.12	The Parish Council was disappointed not to be explicitly consulted on the GBI and Development Site Assessment methodologies over the summer of 2021. Whilst the methodologies are generally robust they are heavily reliant on assessments made by professional consultants. The Parish Council recommend that local residents who know the land should be employed to take part in the assessment activity.
TP-036-061	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.01	The Parish Council have provided details on the following areas of flooding - Hazelrigg Lane at the Motorway underpass; Blea Tarn Road close to Blea Tarn Reservoir; Bailrigg Lane at Low Hill; Burrow Heights Lane at Burrow Cottages; Tarnwater Lane at Lower Burrow; Ou Beck near Five Ashes Lane; Ou Beck at Highland Brow and Burrow Beck at the culvert under the Canal.

APPENDIX A: LANCASTER SOUTH AREA ACTION PLAN - SUMMARY OF ALL RESPONSE TO TOPIC PAPERS (RESPONDER ORDER) - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-036-062	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.02	<p>There are a number of large water pipelines in the area. Whilst we expect Unite Utilities to monitor and maintain them so they do not burst but there have been incidents where developments have burst water mains. Therefore it would be sensible for United Utilities to provide evidence of where any major burst would flood to.</p> <p>It it not clear whether the run-off from the motorway has been considered. This was the source of flooding in Bailrigg in November 2019.</p>
TP-036-063	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.03	<p>The Parish Council considers that the engagement of the Action Plan team with Parish Councils and Local Flood Groups provide good opportunity to share local knowledge.</p>
TP-036-064	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.04	<p>Approach A, involving protecting areas from flood risk, is the only sensible approach. Developing in these areas will not only be more costly in providing flood mitigation but will be socially unjust for the people living there.</p>
TP-036-065	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.05	<p>In accepting that South Lancaster will transform the current rural environment into one large community the Parish Council expect that in return all longstanding flood issues are alleviated for existing communities - this is considered to be a mandatary part of the communtiy benefit the existing community gains for the loss of their rural environment. Therefore the Parish Council does not agree with the intention of paragraph 6.2.4 about not providing for a reduction of flood risk and asks that the Action Plan and accompanying Drainage Strategy explicitly identify and alleviate the existing flooding problems.</p>
TP-036-066	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.07	<p>Whilst Approach B ensures that the Action Plan is consistent with the Partial Review of the Local Plan, it is likely that the Action Plan will have a longer timeframe and therefore if Approach A provides for higher drainage standard then that should be followed otherwise there is a risk that the next iteration of the Local Plan will have higher standards than the Action Plan.</p>
TP-036-067	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.08	<p>Approach B essentially safeguards land that could potentially provide flood alleviation and is therefore the only sensible approach. All other approaches could result in such land being developed and thereby removing this source of flood alleviation forever.</p>
TP-036-068	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.09	<p>The JTP water management principles do not appear to recognise that flooding is often the result of blocked culverts or drains were responsibility rests with the landowner. There should be a princple that landowners are responsible for maintainence and clearance of watercourses and bear the full cost of works if they are carried out by other third parties.</p>
TP-036-069	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.10	<p>The concept of a integrated Blue and Green Infrastructure pointsto sustainable drainage (SuDS) being multi-functional in supporting biodiversity and open space therefore the Action Plan should take this course.</p>
TP-036-070	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.11	<p>Whilst Approach B ensures that the Action Plan is consistent with the Partial Review of the Local Plan, it is likely that the Action Plan will have a longer timeframe and therefore if Approach A provides for higher drainage standard then that should be fo</p>
TP-036-071	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.12	<p>The Parish Council prefers overground drainage because its performance and maintenance can be monitored more effectively.</p>
TP-036-072	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.13	<p>The Parish Council is unaware of any shortcomings in the existing technical guidance provided by United Utilities and other national bodies. Unless there is a significant gap in the guidance that would prejudice delivery of deveopment then it would be better the Action Plan focus its resources elsewhere.</p>
TP-036-073	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.14	<p>The Parish Council would prefer Approach A to be adopted. The components do not need to be specifically described in the Policy as they are specified in technical documents. The Parish Council retains the option of adopting drainage policies within its own neighbourhood plan if the Action Plan adopts the non-policy Approach B.</p>
TP-036-074	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.15	<p>The Parish Council is concerned that there will be a number of developers engaged in the developments within the Action Plan area and that Approach B will result in differing developers adopting different management arrangements, this could result in inconsistencies. The Parish Council therefore prefer Approach A on the basis that SABs will be legally permitted before the Action Plan process is concluded.</p>
TP-036-076	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.16	<p>Discussion in the Topic Paper appears to have address the issue of disposal of surface water with the assumption that foul water systems will only be used as a last resort. The Action Plan drainage strategy needs to be more explicit about if, how and when this may occur and what the impacts would be.</p> <p>The Action Plan needs to address demand for water, in particular policies and design codes that reduce water consumption.</p> <p>It is not clear whether attentuation systems can be linked to water requirements for prospective fruit and crop growing.</p>
TP-036-077	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.01	<p>There appears to be no specific evidence base for a strategy for education and healthcare provision, including the development of Lancaster University, renewable energy generation, improvements to the footpath / bridleway network, a railway strategy and a strategy for securing a skilled workforce.</p>
TP-036-078	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.02	<p>The garden village principles in paragraph 4.1.1 provide a good combination of what is required for a sustainable new place and community. The Parish Council would like to see the inclusion of education and health facilities in the list of facilities at bullet point 3.</p> <p>Local jobs (bullet point 6) are important for the garden village both in terms of reducing the need to travel but will be the hardest to deliver for the Council because ultimately jobs are provided by commercial enterprises. Nevertheless, the Action Plan must include schemes and incentives for employers to locate their businesses in the garden village.</p>
TP-036-079	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.03	<p>The Action Plan must address design issues because it is central to creating a balanced and attractive garden village. The workshops need to have a range of participants who have expertise in design through to local people.</p>
TP-036-080	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.04	<p>The 8 JTP principles relate only to the garden village but provide a reasonable starting point for the Action Plan that focuses upon the creation of wider development. The Parish Council consider these 8 principles should apply across the whole Action Plan area. Whilst the principles are useful, it is considered that the 7 objectives set out in Section 5.3 of Topic Paper 1 are clearer and more comprehensive.</p> <p>Notwithstanding this, neither of these two approaches fully cover the scope of Policy SG1 and the 15 Key Growth Principles, particularly Principles 5, 9, 10, 13 or 15. The Action Plan needs to, as a minimum either comply with Policy SG1 or justify deviations from it.</p> <p>The Parish Council is aware that the University has its own masterplan for its campus but SG1 states that the latter is subordinate to the Action Plan and therefore some review of the University masterplan will need to be part of the Action Plan.</p>
TP-036-081	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.05	<p>The Nation Design Guide is part of National Planning Policy and the Local Plan and Action Plan are required to comply with this. It is therefore a logical starting point for the Action Plan. The Parish Council views the Guide as too vague or unambitious in places and therefore it is only a starting point to which local aspiratios must be added.</p>
TP-036-082	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.06	<p>The Parish Council consider that design codes are critical to the success of the garden village in order to provide consistency and maintain quality standards. Approach C is therefore inappropriate. National guidelines are a low bar and fall short of the standards and vision for the area that Lancaster citizens are expecting therefore Approach A is inadequate. Approach B seeks to develop a locally specific design code which not only achieves local standards but also becomes a blueprint for general deisgn codes that could be used across the district.</p>
TP-036-083	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.07	<p>Figure 5.1 is a high level list of infrastructure elements that appears to be comprehensive enough to cover anything which can be considered catering. There needs to be further consultation on the next levels down of each of the listed items provided by the Action Plan team with guidance on what specific infrastructure expectations really are.#</p>
TP-036-084	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.08	<p>The list of infrastructure providers excludes Network Rail, Bus Infrastructure Providers, British Waterways and Country Landowners Association.</p>

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Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-036-085	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.09	<p>Section 5.5 is effectively a warning that some of the expectations around new development may be dashed by a viability test where the need to reward developers with a prescribed level of profit takes precedence over the infrastructure prescribed. It is vital that there is an early stage high-level viability assessment which is published for residents can be reassured or can reconsider their support for a viability-diluted garden village. If the Council decide to descope infrastructure in order to fulfill the viability tests, then early disclosure will be essential.</p> <p>It is anticipated that the scope and cost infrastructure will evolve as the Action Plan progresses and therefore there will need to be a number of iterations of the viability test. In addition, the Council will have to ensure developers remain committed to the project after each test. If not then the Parish Council would like to see the creation of a publicly owned Lancaster Development Corporation (with CPO Powers) who can undertake the development and plough any profits back into the district.</p> <p>The Parish Council endorses para 5.7.4 regarding education provision as a key component of the Action Plan. It is therefore concerning that the Gladman application does not appear to have any contributions towards education provision.</p>
TP-036-086	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.10	<p>The Parish Council does not support Approach A because of its lack of accountability and the potential that management overheads and profit margins will not stay within the local community. The preferred approach to start with is Approach C with the Council taking responsibility in the early stages of development with Approach B coming with time as the new community grows and establishes itself.</p>
TP-036-087	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.11	<p>All the JTP employment principles are vital to successfully create high quality employment to support all of the new households in the Action Plan area. Some of these principles will however be principally led by employers whilst others will be in the remit of the City Council. Therefore a collaborative approach is required with all key stakeholders in the process.</p>
TP-036-088	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.12	<p>The list of economic sectors in para 7.4.2 are all reasonable for South Lancaster. It is surprising that agriculture, recreation and environmental management are not listed.</p>
TP-036-089	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.13	<p>There is a clear risk with Approaches A and B that the land for employment will be squeezed out by more profitable housing development. This will result in either employment opportunities being lost or in the future there will be pressure to give up greenspace for employment. Therefore the Parish Council will only support Approach C which ensure that long term land allocations for employment will be made in the Action Plan.</p>
TP-036-090	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.14	<p>The Parish Council are not in a position to comment on whether the SHMA assessment of housing mix is appropriate. Intuitively, the mix looks reasonable but the evidence of whether the number of older / mobility impaired residents and their needs can be accommodated need to be provided through the Action Plan process.</p>
TP-036-091	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.15	<p>The Action Plan is the very detailed delivery of the Local Plan and therefore 30% affordable homes should be the starting point. Given the viability testing for infrastructure it is likely there will be pressure to reduce the proportion of affordable homes but the Parish Council would not support any approach which goes below 20%.</p>
TP-036-092	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.16	<p>The types of housing described are reasonable. It is noted that student accommodation is excluded and this position is supported by the Parish Council on the basis that such accommodation should be either on the main campus or in the city centre. Mechanisms should also be established to regulate Houses of Multiple Occupation (HMOs) often populated by students.</p>
TP-036-093	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.17	<p>A village without a local centre is not a village and is merely a housing estate. The success of the garden village depends upon having a viable Local Centre that provides for day-to-day local needs but does not compete with the retail offer of the City Centre. The local centre should be linked to the primary school and be a mix of small convenience stores, cafes, commercial services and community facilities.</p>
TP-036-094	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.18	<p>A garden village of 2,500 people would sustain a number of small and medium sized foodstores. A large supermarket could swamp the local centre, restrict choice and draw customers (and their cars away) from the existing supermarkets and therefore would not be welcome in the local centre. The demand for a large supermarket cannot be ignored and therefore the potential location of a facility at Lawson's Bridge is preferred.</p>
TP-036-095	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.19	<p>A key objective of the garden village is to provide facilities that reduce the use of cars and therefore its local centre ought to be sufficient for its own residents but not attract traffic from the wider catchment area. Therefore the Parish Council support Approach B.</p>
TP-036-096	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.20	<p>The Parish Council would make the following further points:</p> <ul style="list-style-type: none">- The name of the village 'Bailrigg Garden Village' is inaccurate and misleading because the location of the garden village is not in Bailrigg but will encompass Lower Burrow, Burrow Heights and the Canal. Bailrigg Village already exists so its use for this proposed settlement is both confusing and disrespectful. There needs to be public consultation on naming the garden village.- The garden village will fall across 4 existing Parish Boundaries. It would make sense for the whole garden village to reside in one parish. Such a governance review is technically a separate exercise but should be undertaken in conjunction with the Action Plan.- Consideration needs to be given to the relationship between the Action Plan and the Scotforth Neighbourhood Plan which has just begun its preparation. The Action Plan needs to provide clarity on the relative weight of its content and the implications between the two documents.- School provision in South Lancaster needs to be clarified at both Primary and Secondary level to ensure there are sufficient places locally and reduce the implications of excessive traffic movements on the local road network.
TP-037-001	Alice Watson	Natural England	Topic Paper 1	T1.01	<p>Natural England have no specific comments to make on evidence gaps but advise that the noise and air quality assessment should also assess impacts on ecological receptors. We advise that depending on location you may need to undertake further species specific surveys such as Great Crested Newts, Badger, Bat and freshwater invertebrate surveys where identified as appropriate. We acknowledge these may happen at Development Plan level.</p>
TP-037-002	Alice Watson	Natural England	Topic Paper 1	T1.02	<p>Natural England welcome the inclusion of achieving positive intergration with the local environment. We advise that you may wish to strengthen and expand on the vision. Instead of achieving positive integration, the masterplan is an opportunity to protect and enhance the local environment. We advise that a well thought out layout, design and creation of the GBI network, the masterplan could aid achieving the restoration of the natural environment.</p>
TP-037-003	Alice Watson	Natural England	Topic Paper 1	T1.03	<p>We welcome the expansion within the objectives of embedding the natural environment into new development. We advise you wish to consider the ongoing national strategies that will come into law in 2023 when discussing objectives, for example the implications around Biodiversity Net Gain (BNG). We advise that you may wish to refer to the upcoming Local Nature Recovery Strategies to support the delivery of Objective 1. We advise for objective 2 you may wish to refer the objective of incorporating sustainable transport corridors which have the significant potential to combine multi-functional GBI infrastructure with low carbon modes of travel. Natural England advise that Objectives 1 and 3 could provide the opportunity to implement strategic solutions to help address recreational pressures in Morecambe Bay and Duddon Estuary.</p>
TP-037-004	Alice Watson	Natural England	Topic Paper 1	T1.05	<p>We advise that of the plan includes strategic solutions that are required to last longer than the Area Action Plan timescales, then these may need to be secured via different planning obligations, for instance the obligations for BNG will need to be secured for at least 30 years.</p>
TP-037-005	Alice Watson	Natural England	Topic Paper 1	T1.14	<p>Natural England advises the Action Plan provides an opportunity to implement a strategic solution to help address disturbance via recreational pressure on nearby sites (and land which is functionally linked to those sites) associated with increased residential development.</p> <p>We acknowledge that the Habitats Regulation Assessment (HRA) includes mitigation options, however we advise the Action Plan represents an opportunity to create a overarching strategy which will help to mitigate the current ongoing issues of recreational disturbance. An example where this has worked well is the Thames Basin Special Protection Area Avoidance Strategy. Natural England advise that Accessible Natural Green Space Standard (ANGST) could be a useful tool to use when assessing open space and residential development.</p>
TP-037-006	Alice Watson	Natural England	Topic Paper 3	T3.24	<p>Natural England note that this Topic Paper focuses on addressing climate change through energy efficiency, sustainable design and sustainable construction on which we have no detailed comments to make.</p> <p>However, we would take the opportunity to advise on how climate change can be addressed through nature based solutions (NbS). NbS can contribute to reducing net greenhouse gas emissions and carbon sequestration as part of the Government's wider strategy for achieving net zero. Natural England support the use of NbS to contribute to climate change mitigation and adaption, such as SuDS and the creation of wetland areas which provide several benefits for biodiversity as well as reducing flood risk.</p> <p>Natural England advises that you can contribute to climate change mitigation by avoiding developing on peat. Peat is a precious and irreplaceable resource.</p> <p>A development may affect the ability of the natural environment to adapt to climate change, including the ability to provide adaptation for people. The proposed development provides the opportunity to present nature based solutions on-site.</p>
TP-037-007	Alice Watson	Natural England	Topic Paper 4	T4.03	<p>Natural England in principle concur with the 8 design principles, however we would advise these should be landscape and biodiversity led with an emphasis to restore the biodiversity on-site and ensure there are no conflicts between any high value existing habitat and that to be created.</p>

APPENDIX A: LANCASTER SOUTH AREA ACTION PLAN - SUMMARY OF ALL RESPONSE TO TOPIC PAPERS (RESPONDER ORDER) - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-037-008	Alice Watson	Natural England	Topic Paper 4	T4.04	<p>We advise the recommendations should be landscape-led but also consider the aspects of the wider landscape and ecological receptors which may be impacted by the design of the development and ensure they do not conflict with other policy mechanisms within the plan.</p> <p>We advise that you may wish to further strengthen wording regarding recommendation A for delivering Green Infrastructure, instead of using the word minimise we advise this could say 'prevent impacts where possible' to strengthen the aim within the Action Plan. You may also wish to consider expanding recommendation E by setting out what green infrastructure could be delivered wihtin the wider parkland setting such as native landscaping.</p> <p>For Securing Access Natural England advise that recommendation B should be expanded to set out how green infrastructure will be promoted within east-west trave; connections such as green bridges and sustainable transport corridors have significant potential to be multi-functional GBI networks wiht low carbon modes of travel.</p>
TP-037-009	Alice Watson	Natural England	Topic Paper 4	T4.05	Natural England advises that when considering the 'Green Halo' the decision should be landscape and biodiversity led. Depending on the habitat that will be used to create a 'Green Halo' it should be placed where the best opportunities are to protect and enhance the surrounding habitat to support nature recovery within the area.
TP-037-010	Alice Watson	Natural England	Topic Paper 4	T4.07	Natural England welcomes the Council's approach to existing habitats and advises Approach A would be best to complement the Local Nature Recovery Networks process. The Action Plan should make reference to the emerging Lancashire Local Nature Recovery Networks as a strategic tool for mapping existing habitats could be enhanced or restored. Natural England further advises Approach A should make reference to the emerging Recovery Networks as a mechanism to target locations of potential Green Infrastructure enhancements.
TP-037-010	Alice Watson	Natural England	Topic Paper 4	T4.08	Natural England would welcome a Biodiversity Net Gain (BNG) target which is greater than 10%, however this would need to be viable and fully evidencedas it may not be achievable. As pointed out in the Sustainability Appraisal report targets which are greater than 10% may not be feasible, however the use of green roofs and walls may represent opportunities boost net gain delivery. We further note that the Nature Recovery Networks may have implications on the types of BNG that can be created both on-site and off-site.
TP-037-011	Alice Watson	Natural England	Topic Paper 4	T4.09	<p>We advise that Approach D would be the approach that would assist the strategic, evidence-based delivery of BNG within the Action Plan, therefore delivering benefits to both biodiversity and the local community, as well as achieving other benefits such as flood risk and air quality improvements.</p> <p>Natural England advise that whilst there should be flexibility within local policy to favour off-site strategic sites rather than always aiming to achieve on-site BNG delivery as a strategic approach, your authority shoud also take into account the need for Green Infrastructure within local communities.</p>
TP-037-012	Alice Watson	Natural England	Topic Paper 4	T4.10	<p>The detailed consideration of soils and their management is welcomed, this should be based on site-specific soil information derived from detailed agricultural land and soil surveys. Further advice is provided on the detail and content of the bullet points presented:</p> <ul style="list-style-type: none">- Bullet point (c) should include any proposed habitat creation / landscaping / GI- The current focus of bullet point (d) is an important point and should consider the outcomes of 'Benefitting from Soil - Managment in Development and Construction' produced by the BSSS.- Bullet points (e), (f) and (g) allo relate to soil management, which need to be informed by a site-specific soil survey, Mitigation should aim to minimise soil disturbance and retain as many ecosystem services as possible through careful soil management during the construction process and appropriate soil re-use. <p>Defra has published a Construction Code of Practice which provides overarching advice on the use and protection of soil in construction projects, including the movement and management of soil resources. This should be referred to in the Action Plan. The topic paper should also state that any soil handling should be supervised by an appropriately experienced soil expert and should take place in the dryer summer months where soils are dry and friable. Soil handling methods should normally be as specified in Defra's Construction Code of Practice.</p> <p>In summary, it should be made clear that all allocations and susequent planning should be informed by a detailed soil and agricultural land survey, a soil management plan is prepared setting out the soil handling requirements to ensure sustainable management of the soil resource and reference is made to Defra's Construction Code.</p>
TP-037-013	Alice Watson	Natural England	Topic Paper 4	T4.11	Natural England agree that either Approaches B, C, D and E would provide the most benefit for implementing the findings of the GBI Strategy. It is important the strategy protects and enhances existing green infrastructure as well as incorporating new infrastructure. Natural England have just launched a new national framework of standards for green infrastructure which should be considered.
TP-037-014	Alice Watson	Natural England	Topic Paper 4	T4.12	<p>Natural England note the topic paper does not include mention of peat. Peat is a precious and irreplaceable resource and deep peat is highlighted within the Action Plan area. Natural England would strongly support the omission of peat from development, peat can be very difficult to restore, recreate or restore once destroyed. Development design should not compromise future rewetting and restoration of peat deposits. We wish to highlight thatpeat requires a specific set of hydrological, physical, chemical and microbial conditions to accumulate. Therefore, peat is vulnerable to enrichment which may arise from activities such as elevated nutrients which may be found in water discharges.</p> <p>We advise that as part of the Action Plan process you may wish to avoid areas of pet being developed or being sealed in and use them as BNG habitats in a tailored ay, perhaps linking to green infrastructure. We further advise that the Action Plan is a good opportunity to ensure that they reflect the Local Nature Recovery Networks which became manditory in April 2022 and requires a strategic approach to habitat enhancement and protection.</p>
TP-037-015	Alice Watson	Natural England	Topic Paper 5	T5.04	We advise the Council's preferred approach will deliver the best outcome for nature via incorporating the drainage strategy into green and blue infrastructure (GBI). We are highly supportive of the use of GBI to minimise flood risk as it provides benefits including flood storage and urban cooling to support climate change mitigation.
TP-037-016	Alice Watson	Natural England	Topic Paper 5	T5.08	Natural England is supportive of interlinking flood alleviation / mitigation areas to the GBI Strategy. We advise you may wish to consider the best opportunities for biodiversity within the Action Plan area, such as the creation of wetland habitats.
TP-037-017	Alice Watson	Natural England	Topic Paper 5	T5.09	The value of water resources should be considered, drought resilience can be made by holding back water in the catchment and allowances for natural flood management could be made. This includes allocating areas to naturally flood or additional wetland provision. Natural England would welcome opporutnities to create, enhance or restore habitats which connect to the designated sites. A wider netwok of wildlife-rich corridors and spaces can have multiple benefits to bot nature and people.
TP-037-018	Alice Watson	Natural England	Topic Paper 5	T5.10	Natural England advise the use of natural processes should be used in the first instance, including the use of nature based solutions. We further advise that in some circumstances, SuDS attenuation basins can be designed to hold no or limited water, only filling when in flood conditions. However, in peat and other wetland habitats, this may not always be the most tailored option to on-site habitats and their enhancement.
TP-037-019	Alice Watson	Natural England	Topic Paper 5	T5.12	Natural England advises that the use of nature based solutions should always be prioritised. This should be achieved by working with natural processes and green infrastructure. This should support, restore and enhance local habitats / species and habitat connectivity.

SUMMARY OF RESPONSE TO **TOPIC PAPER 1: OVERALL DEVELOPMENT STRATEGY** - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
GENERAL COMMENTS TO TOPIC PAPER 1					
TP-001-001	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.00	<p>Overarching observation that the Topic Papers do not contain any detail on the location phasing, funding or delivery of infrastructure and are very light on information in relation to the function and scope of the South Lancaster Growth Catalyst (SLGC). This detail is essential to ensure deliverable of the plans for South Lancaster. The SLGC reflects an agreement between the City and County Council's for the prioritisation, funding and development of both local and strategic infrastructure required to facilitate growth.</p> <p>Policy SG3 of the Local Plan makes clear that the forthcoming DPD for South Lancaster will address matters relating to financing and delivery, the phasing of new infrastructure and its specific location. It is therefore assumed that the detail on these matters will follow in the Implementation Strategy referred to in Topic Papers 1, 2 and 6.</p> <p>In view of the number and significance of planning applications in South Lancaster which are currently submitted for approval (or could come forward in advance of the Action Plan) it is imperative that urgent consideration is given to an interim strategy to ensure a fair and consistent approach to such applications. In particular making sure that fair and proportionate contributions are made to the delivery of strategic infrastructure in accordance with the expectations of Policies SG1 and SG3.</p>
TP-007-028		Thurnham with Glasson Parish Council	Topic Paper 1	T1.00	<p>The Parish Council would like to raise the following further points:</p> <ul style="list-style-type: none">- It recognises that the Council will not build the houses but is seeking to establish constraints that the developers will have to conform to.- The Parish Council welcomes good design across developments.- The Parish Council would like to see as many affordable houses as possible within the mix.- The Parish Council questions the ability of the Council to control employment opportunities and develop business. It is highly likely that new residents will commute by car elsewhere.- Plans for modal shift seem to depend on employment being found locally, including the hospital and universities but these cannot sufficiently absorb 3,500 houses.- Links to reduction in traffic in the centre of Lancaster must consider access from the south via the bottleneck at Pointer Roundabout and must find ways to reduce rat-running.- The Parish Council is extremely concerned about water management within new development. Whilst run-off is promised to be decreased it is unclear how this could be achieved given the size of attenuation areas which would be required. Run-off levels into the River Conder in particular should not be increased.- Water and flood management must have compulsory requirements within these developments but it is unclear how these will be enforced.- The Parish Council welcomes the ambitions for Biodiversity Net Gain.
TP-010-001	Tim Bettany Simmons	Canal & Rivers Trust	Topic Paper 1	T1.00	<p>This paper sets scene for development and the policy context and concept masterplan. The Trust has previously inputted into the planning policy for the area and emerging masterplan. We welcome the canal corridor has been fully considered within the overall development strategy for the site and the relationship of the development to the canal.</p>
TP-014-001	Chloe Boyle	Marine Management Organisation (MMO)	Topic Paper 1	T1.00	<p>The MMO have no specific points to make in relation to the Topic Papers, however would draw the City Council's attention to the role of Marine Management Plans and their relationship to aspects of the Action Plan, Marine Licensing and the role of North West Marine Plan.</p>
TP-016-001	Warren Hilton	National Highways	Topic Paper 1	T1.00	<p>It is recommended that further evidence is required around transport, highway modelling, carbon impact and air quality. National England should be consulted on the scope and brief for the transport evidence work. It will be critical for the timely delivery of infrastructure to facilitate growth, we recommend that these interventions are specific and have an associated timetable. The Topic Paper states that development will be permitted provided that residual impacts on the highway network are not severe, a discussion with the relevant highway authorities is needed to define what severe is. The document refers to the reconfiguration of Junction 33 however these references are vague and it will need to be defined what the scheme is in terms of design, modelling and costing.</p>
TP-020-001	Melanie Fryer	N/A	Topic Paper 1	T1.00	<p>Stop any further building on Green Belt land and do not sell off land which could be farmed. Renovate and have local occupancy for all homes and businesses currently not being used. Use eco-friendly materials and simplify policies. Any new builds which are currently underway need to be well insulated with renewable energy features. Wildlife should have priority on all sites, green spaces use for local community use, sport and growing food and some areas left undisturbed. Dedicated wildlife areas should be encouraged with tree planting. All Council sites should have a no peat and no pesticides policy.</p>
TP-021-001	Emily Hrycan	Historic England	Topic Paper 1	T1.00	<p>Thank you for consulting Historic England, at this stage we have no comments to make on the content.</p>
TP-023-001		Lancaster Civic Vision	Topic Paper 1	T1.00	<p>We are disappointed at the lack of clearer more specific comments to the provision of social housing. Topic Papers 1 and 6 makes no specific reference. The Council's own Homes Strategy clearly demonstrates the urgent need for additional social housing. We would therefore argue that the Action Plan should contain a clear commitment without caveat to the provision of a significant level of social housing.</p>
Question T1.1: Do you feel that the evidence base identified in Table 4.1 represents a reasonable and proportional basis to prepare the Lancaster South Area Action Plan? If not, what gaps in evidence do you think are missing?					
TP-001-002	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.01	<p>The following strategies are missing from the core evidence base - a developer contributions / planning obligations strategy, landowner collaboration strategy and clarity on infrastructure priorities.</p> <p>These are key components of the implementation strategy to ensure the plan is deliverable. The County Council invite a separate topic paper on the implementation strategy where these issues may be addressed in more detail.</p> <p>In addition, the County Council consider that an Implementation Strategy should be preceded by an interim Implementation Strategy which sets out the planning authorities position in relation to determining early applications. This is to ensure that development contributes fairly and proportionately towards strategic infrastructure.</p>
TP-002-001	Matthew Symons	Hollins Strategic Land	Topic Paper 1	T1.01	<p>HSL is satisfied that the evidence base set out in the Topic Paper is sufficient and proportionate.</p>

SUMMARY OF RESPONSE TO **TOPIC PAPER 1: OVERALL DEVELOPMENT STRATEGY** - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-004-001	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 1	T1.01	<p>The level of detail set out in Table 4.1 is welcomed and is considered to represent a suitable evidence base in the preparation of an Action Plan. There is a element of concern that a number of the documents listed in this table remain 'ongoing' and it will be important that this evidence base is completed before the Council seek to make any further progression with the Action Plan, evidence should not be used to backfill the Action Plan, rather it should inform it. It is also important that these documents are released to the public as part of a wider consultation exercise so they are subject to proper scrutiny.</p> <p>Additionally, the Action Plan should be accompanied by an appropriate masterplan, phasing plan and development framework. It is noted that the Council are reliant on a masterplan which does not align with the broad location for growth. This is considered to be a flaw in the evidence which supports the development of the AAP. For robustness, it is considered that a masterplan should be developed which is consistent with the Local Plan designation.</p> <p>Whilst the Council appear to accept the JTP Masterplan represents a starting point for the consideration of the AAP, it remains a point of concern that the Council are pressing ahead with the principles considered in the masteprlan without having the benefit of a full evidence base to inform their considerations.</p>
TP-005-001	Christopher Carroll	Sport England	Topic Paper 1	T1.01	<p>The Playing Pitch Strategy will form a key part of the evidence base which should guide policies within the plan. It is strongly advised that the forthcoming strategy is a playing and outdoor sports strategy to ensure wide considered is taken for the needs of all sports. The Council may also wish to consider the role of a Built Facilities Strategy however it is recommended this forms part of a district-wide strategy.</p>
TP-009-001	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 1	T1.01	<p>It is clear that further work is necessary to determine an appropriate methodology for calculating developer contributions towards infrastructure improvements. Our clients consider further work is necessary implementation and developent phasing, consideration should be given to phasing and the consequential impacts on viability. Current timescales indicate that the Action Plan will not be adopted until 2024, is essential that the evidence base is kept up-to-date.</p>
TP-015-001	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 1	T1.01	<p>The Infrastructure Delivery Plan should include consideration of healthcare and education facilities. That will ensure that the Action Plan is developed in a holistic way. The Energy Strategy should include consieration of existing utilities infrastrucstur, including the capacity and potential requirements for additional sub-stations connections to this infrastructure. This will require the City Council to engage wiht the relevant utility providers and ensure that all development, including development already committed is accounted for. The Energy Strategy should also map existing key utilities infrastructure, including national pipelines in order to understand the locations of any Health & Satefy Executive consultation zones.</p>
TP-016-002	Warren Hilton	National Highways	Topic Paper 1	T1.01	<p>It is unclear from the evidence base presented in Table 4.1 where a transport and movement evidence base will sit. Quantitative analysis is required to model Travel Demand Management Measures, active user scenarios and traffic modelling for various traffic horizons.</p>
TP-024-001	Alban Cassidy	Cassidy & Ashton	Topic Paper 1	T1.01	<p>The evidence base should also include Agricultural Land Grading, a full suite of Ecology Surveys ad Utilities Surveys to understand the existing range of capacity of services that are available.</p>
TP-029-001	Katrina Barnish	N/A	Topic Paper 1	T1.01	<p>No, the evidence sought by the Council is completely inadequate. The public has been conducted in such a way that the residents at best have not been listen to and at worst had their views manipulated.</p>
TP-030-001	Simon Bibby	N/A	Topic Paper 1	T1.01	<p>No</p>
TP-033-001	Graham Lamb	Pegasus Group on behalf of Highgrove Strategic Land Ltd	Topic Paper 1	T1.01	<p>Whilst the evidence base looks comprehensive it would be useful for the Council to clarify if these will be consolidated into an overall 'Site Selection Paper' to demonstrate how all land in the Action Plan area has been assessed and appraised into allocations within the Action Plan.</p>
TP-036-001	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.01	<p>There appears to be no specific evidence base for a strategy for education and healthcare provision, including the development of Lancaster University, renewable energy generation, improvements to the footpath / bridleway network, a railway strategy and a strategy for securing a skilled workforce.</p>
TP-037-001	Alice Watson	Natural England	Topic Paper 1	T1.01	<p>Natural England have no specific comments to make on evidence gaps but advise that the noise and air quality assessment should also assess impacts on ecological receptors. We advise that depending on location you may need to undertake further species specific surveys such as Great Crested Newts, Badger, Bat and freshwater invertebrate surveys where identified as appropriate. We acknowledge these may happen at Development Plan level.</p>
TP-035-001	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.01	<p>There are a number of items of evidence which remain ongoing or still to be commissioned, what if one of those assessments reveals an issue which might alter the focus or extent of the Area Action Plan? There does not appear to be anything in this evidence list relating to the provision of education or health facilities. Likewise there is little or no mention of a sewerage strategy and the implications on the Stodday Treatment Works. Furthermore, the Parish Council are aware of the geographical constraints to expansion and would oppose any expansion which would have an adverse impact ont he surrounding countryside, especially the wooded area on the eastern border of the area.</p>
Question T1.2: Do you agree with the proposed vision for the Area Action Plan? Are there any issues or opportunities which you feel have been missed from the vision?					
TP-005-002	Christopher Carroll	Sport England	Topic Paper 1	T1.02	<p>In principle, Sport England are supportive of the vision as it broadly aligns with our objectives.</p>

SUMMARY OF RESPONSE TO **TOPIC PAPER 1: OVERALL DEVELOPMENT STRATEGY** - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-001-003	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.02	There is sufficient analysis at this stage of what it means for the necessary and appropriate infrastructure to be delivered in the right place and at the right time. The County Council request that the Action Plan expressly acknowledges the need for a co-ordinated, fair and consistent approach to strategic infrastructure funding and delivery and includes a preference against piecemeal delivery as per Policy SG3 of the adopted Local Plan.
TP-004-002	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 1	T1.02	There is no objection to the vision set out in 5.1.1 but there are concerns around the extent to which the vision is biased towards the delivery of garden village. The garden village is clearly a significant aspect of the Action Plan but, as Policy SG1 indicates, it forms only one element of the wider broad location for growth. It is therefore recommended that the vision should be amended to strike a clear balance between the delivery of the garden village and the rest of the Action Plan area.
TP-030-002	Simon Bibby	N/A	Topic Paper 1	T1.02	No
TP-007-001		Thurnham with Glasson Parish Council	Topic Paper 1	T1.02	The proposed vision is vague and hard to visualise. It is not clear that elements of the vision are compatible between the need to deliver housing, addressing the climate emergency and the delivery of infrastructure.
TP-009-002	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 1	T1.02	Our Clients support the overall vision for the South Lancaster area and would welcome the identification of land at Whinney Carr as a local for urban extension which can assist in the delivery of short-term housing needs. Our clients understand the need to reduce the impacts of climate change in the design of new development, sustainability is key to the Peel L&P and ensuring new development seeks to mitigate impacts is central to their thinking.
TP-015-002	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 1	T1.02	Lancaster University is concerned that the vision does not include reference to Lancaster University either in terms of its protecting or expanding the campus. As drafted the vision is too narrowly focused on the delivery of South Lancaster and therefore doesn't align with various policy requirements of Policy SG1. The vision makes reference to necessary and appropriate infrastructure, this should include open space provision in order to establish the importance of green infrastructure.
TP-016-003	Warren Hilton	National Highways	Topic Paper 1	T1.02	<p>The vision outlined refers to promoting modal shift. We consider that modal shift should be a vision for the City or wider area where there are existing congestion issues. The Vision for the 'Broad Location for Growth' should be based around the promotion of low carbon activity.</p> <p>In reference to digital connectivity it is recommended that this statement goes further in terms of thee specification and coverage of digital provision as this will help enable digital access to replace some journeys on the highway network.</p>
TP-024-002	Alban Cassidy	Cassidy & Ashton	Topic Paper 1	T1.02	The vision itself is acceptable but the key is to ensure that it is truly achieved and it is essential that the Council are committed and have the appropriate policies in place to ensure that development is truly sustainable.
TP-033-002	Graham Lamb	Pegasus Group on behalf of Highgrove Strategic Land Ltd	Topic Paper 1	T1.02	The Council have an established vision to create a sustainable place to live and work in South Lancaster. Whilst we support the broad principles of the vision, there are no details regarding the approach and types of employment opportunities which are to be provided.
TP-036-002	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.02	The vision for the garden village is generally laudable but must be strengthened by specific comment on the type and quality of work and employment that will be developed within the garden village to reduce traffic and make it an attractive location for people to live and work. The vision needs to prevent new development becoming a commuter suburb with residents working outside the district. Whilst the vision refers to creating a distinct sense of place, it is important that the vision makes clear that the garden village will be 'forever a distinct village set in a rural landscape, visually and physically separate from the urban edge of Lancaster City'.
TP-037-002	Alice Watson	Natural England	Topic Paper 1	T1.02	Natural England welcome the inclusion of achieving positive intergration with the local environment. We advise that you may wish to strengthen and expand on the vision. Instead of achieving positive integration, the masterplan is an opportunity to protect and enhance the local environment. We advise that a well thought out layout, design and creation of the GBI network, the masterplan could aid achieving the restoration of the natural environment.
TP-035-002	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.02	It is difficult to argue with the broad themes of the vision, however we would argue with the central premise that a development of the size of the garden village is required. The enormous environmental impact of the project and the massive and still spiralling costs involved in the delivery of infrastructure are just two reasons for our ongoing opposition to the development.
Question T1.3: Do you agree that the Objectives set out in this Paper accurately reflect the Key Growth Principles set out in Policy SG1 of the Strategic Policies & Land Allocations DPD and the Vision? If not, what areas have not been covered, providing suggestion of how they might be considered.					
TP-001-004	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.03	Policy SG1 needs to be read alongside Policy SG3 and the core objectives of the Local Plan and there should be a focus on the delivery of strategic infrastructure. At paragraphs 7.4.4 the planining authority articulates its intention to consider planning applications in a fair and equal manner. The County Council welcome this intention but considers this should not be read in abstraction of the second limb of Policy SG3 which seeks to prevent piecemeal development coming forward in advance of the Action Plan.

SUMMARY OF RESPONSE TO **TOPIC PAPER 1: OVERALL DEVELOPMENT STRATEGY** - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-004-003	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 1	T1.03	<p>There is no objection to the objectives identified for the Action Plan and consider these effectively capture the aims and objectives of SG1. To re-iterate it is important that the Action Plan deals with development across the whole designation, not just the garden village.</p> <p>The Council should seek to finalise and publish its evidence base to ensure that all options can be considered in forming a view of how these objectives can be met. Whilst the options prepared by JTP rptresent one option to how part of the growth area could be delivered, it is important that a number of options are considered and supported by appropriate evidence in justifying a preferred option.</p>
TP-005-003	Christopher Carroll	Sport England	Topic Paper 1	T1.03	<p>In principle, Sport England are supportive of the objectives and how they will be delivered, particulatly as sports and recreational oportunties are recognised as being key to delivering objectives 1 and 3 of the Plan. Sport England would welcome further clarification and consultant on the proposed relationship between any future development and any existign sports facilities to ensure that development accords with Sport England guidance.</p>
TP-007-002		Thurnham with Glasson Parish Council	Topic Paper 1	T1.03	<p>Vagueness in the vision and language used, what is defined as the 'local vernacular'? The paper talks about green gaps in South Lancaster and Galgate but makes no reference to gaps along the A588. Objective 6 refers to the allocation of land for shops and business - if so what types and where?</p>
TP-015-003	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 1	T1.03	<p>Generally, the university support the objectives set out in Topic Paper 1 and consider these reflect the key growth principles in Policy SG1. In relation to Objective 4, the Action Plan should seek to protect the highly sucessful campus eco-system and enhance the surrounding campus. With regard to Objective 6, greater emphasis should be placed on the role of the university in the economy of South Lancaster and also the critica importance of protecting the Bailrigg Campus in the context of the Action Plan.</p>
TP-024-003	Alban Cassidy	Cassidy & Ashton	Topic Paper 1	T1.03	<p>The objectives do not reflect the Key Principles in Policy SG1 but, the key is for the Council to ensure that the objectives are truly achieved. In particular Objective 2 which seek to create neighbourhoods which are well connected and well integrated to the existing built up area.</p>
TP-031-003	Simon Bibby	N/A	Topic Paper 1	T1.03	<p>Not relevant as I do not agree with any further development.</p>
TP-033-003	Graham Lamb	Pegasus Group on behalf of Highgrove Strategic Land Ltd	Topic Paper 1	T1.03	<p>Objective 6 which seeks to support economic prosperity is welcomed and aligns with Policy SG1. If the Action Plan wants to be truly flexible and attract a wide range of business, it must support the full range of employment needs, including larger format logistics and warehouse floorspace to maximise the economic benefits offered by the supporting infrastructure and improved highway links.</p> <p>Objective 2 should be strengthened to reflect the importance of all the road infrastructure, including the Junction 33 reconfiguration which is not sufficiently mentioned.</p>
TP-036-003	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.03	<p>We note that the 7 objectives are not the same as the 8 principles contained in the JTP Masterplan and in many ways are clearer and more specific However, there are gaps in terms of their relationship to Policy SG1 including:</p> <ul style="list-style-type: none">- Objective 1 refers to a Burrow Beck corridor. The risk is that this corridor ends up too narrow and squeezed by development and therefore we suggest re-referencing this area to refer to the Burrow Beck Strategic and Green Valley.- Objective 2 ignores exisring communities and properties that also need strong digital connections. It is an important principle that existing communities benefit from the same infrastructure standard applied to new development including digital connectivity, flood alleviation and appropriate speed limits.- Objective 4 refers to green gaps between South Lancaster and Galgate whereas SG1 makes specific reference to Bailrigg Village, this must be retained. Secondly, reference to 'gaps' is weak and inconsistent with Policy SG1 which refers to distinct areas of separation.- Objective 5 is let down by weak committment and needs to be more assertive and demanding in places. Langauge should use more 'wills' and 'musts'.- Objective 6 makes fleeting reference to Lancaster University and is insufficient representation of Policy SG1 principles IX and X which place must more emphasis on protecting and enabling University benefit.- Objective 7 does not make it clear that commercial developers share responsibility for ensuring infrastructure is in place before new homes are occupied. The principle must be explicit that development should not be occupied until they are accessible to schools, health care and community facilities.- Objective 7 goes beyond SG1 Principle VIII in that it recognises the need for an agreed strategy towards stewardship. This is welcomed but need to ensure that garden village does not straddle existing parishes and wards.
TP-037-003	Alice Watson	Natural England	Topic Paper 1	T1.03	<p>We welcome the expansion within the objectives of embedding the natural environment into new development. We advise you wish to consider the ongoing national strategies that will come into law in 2023 when discussing objectives, for example the implications around Biodiversity Net Gain (BNG). We advise that you may wish to refer to the upcoming Local Nature Recovery Strategies to support the delivery of Objective 1. We advise for objective 2 you may wish to refer the objective of incorporating sustainable transport corridors which have the significant potential to combine multi-functional GBI infrastructure with low carbon modes of travel. Natural England advise that Objectives 1 and 3 could provide the opportunity to implement strategic solutions to help address recreational pressures in Morecambe Bay and Duddon Estuary.</p>

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Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-035-003	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.03	<p>It is difficult to argue with the objectives in themselves, however the task of implementing them in the context of national and local economic challenges and the lack of enforcement to require developers to build these standards is likely to make many of them unachievable. Again, until all evidence is in place surely it is difficult to say whether these represent achievable objectives?</p> <p>Objectives 1 and 4 refer to the separation of the garden village from existing settlements. The Action Plan is therefore already too late in this regard as developers are applying for planning permission on land which could be incorporated into the 'Green Halo'.</p>
Question T1.4: Do you agree with the proposed starting point in terms of the Geographical Scope for the Lancaster South Area Action Plan? If not, please explain your preferred approach and the rationale for your choice.					
TP-001-005	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.04	<p>Whilst this is ultimately a decision for the planning authority, the County Council agree with the benefits of future proofing the plan as highlighted in para 6.4.3. If the Action Plan is predicated on Approach A then the development plan policy should clearly acknowledge the possibility of future growth beyond the Action Plan area. In addition, any such policy should make clear that development outside of the Action Plan area may need to contribute towards the delivery of strategic infrastructure whether or not such infrastructure has already been delivered by the time such development comes forward.</p>
TP-002-002	Matthew Symons	Hollins Strategic Land	Topic Paper 1	T1.04	<p>HSL acknowledges the Local Plan sets the broad location for growth and agrees this must be the primary focus. However, the Action Plan also represents an opportunity to look beyond the Garden Village as was done for the JTP Masterplan. The Action Plan could set a vision for how the Garden Village may expand in the future, reflective of national planning guidance which encourages planning authorities to set a vision of at least 30 years into the future where new settlements are proposed. It is important that the progress of the Action Plan is not hampered by extending the geographic scope, however the Action Plan could include a broad vision over how the Garden Village could evolve over many decades.</p>
TP-004-004	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 1	T1.04	<p>Our clients agree that the starting point in terms of geographical scope for the Action Plan should be the broad location for growth as identified by Policy SG1. It should not be the garden village area which does not align to the Local Plan.</p>
TP-007-003		Thurnham with Glasson Parish Council	Topic Paper 1	T1.04	<p>Agree with Council's preferred Approach A, but there are concerns that the intention expressed later in the Topic Paper that planning will continue for the area outside of the 'Broad Location for Growth'. The Parish will not be directly affected by development within the designation but could be significantly affected if further growth was to be planned for in years to come which have not been sufficiently planned for in infrastructure terms. To avoid such a policy vacuum Approach C may be preferable.</p>
TP-008-001	Peter Dutton	Gladman Developments	Topic Paper 1	T1.04	<p>Gladman agree that as a minimum the geographic scope of the Action Plan should be consistent with the Local Plan. Policy SG1 of the Plan sets out an expectation that a future planning framework. In this respect, Gladman believes that focussing the Council's AAP work solely on the garden village and the masterplanning work undertaken by JTP would not be an appropriate or sound approach.</p>
TP-009-003	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 1	T1.04	<p>Our clients agree that the starting point in terms of geographical scope for the Action Plan should be the broad location for growth as identified by Policy SG1, as such Approach A is preferable. It is however important that in preparing the Action Plan that it has regard for the potential expansion of the garden village beyond the 'Broad Location of Growth' and consider expansion such as that identified in the JTP Masterplan. This wider potential should be considered in the context of wider infrastructure delivery.</p>
TP-015-004	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 1	T1.04	<p>The University agrees that Approach A is the most appropriate for the Action Plan. We agree that reducing the scope of the Action Plan would lead to a planning vacuum and would not be a sound or robust approach. The University is in agreement that future development beyond the plan period should be considered in future reviews of the Local Plan.</p>
TP-016-004	Warren Hilton	National Highways	Topic Paper 1	T1.04	<p>National Highways agrees that Approach A is the best geographical fit from the options presented. We agree this should be aligned with the 'Broad Location for Growth' as identified by Policy SG1 of the Local Plan. However, a new version of the plan which better illustrates the transport and highway network is recommended.</p> <p>National Highways note that the existing Junction 33 is not covered by this geographical scope which may warrant further review. National Highways note that defined geographical scopes are often required for documenting where developer contributions can be spent.</p>
TP-024-004	Alban Cassidy	Cassidy & Ashton	Topic Paper 1	T1.04	<p>The geographic scope for the development should be wholly contained within the 'Broad Location for Growth' as identified by Policy SG1. It would therefore be contrary to consider land outside of that area.</p>
TP-029-002	Katrina Barnish	N/A	Topic Paper 1	T1.04	<p>Building dormitory suburbs where car use will be essential will be exactly the opposite of what needs to happen. Congestion issues in Lancaster City Centre are well known. Residents of Lancaster deserve more than empty promises that improvements will follow if South Lancaster goes ahead. Brownfield areas are many across the whole city and wider areas which should be being exploited.</p>
TP-030-001	Louise Gill	RSPB	Topic Paper 1	T1.04	<p>The JTP Masterplan has provided village type areas to be in keeping with the area while providing space for nature in woodlands and green areas.</p>
TP-031-004	Simon Bibby	N/A	Topic Paper 1	T1.04	<p>No, there has already been too much development in South Lancaster and the character and virtue of the area will be completely destroyed if development continues.</p>

SUMMARY OF RESPONSE TO **TOPIC PAPER 1: OVERALL DEVELOPMENT STRATEGY** - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-033-004	Graham Lamb	Pegasus Group on behalf of Highgrove Strategic Land Ltd	Topic Paper 1	T1.04	We believe that the Action Plan should include the full length of the proposed M6 Link Road, given the importance it has to Policies SG1 and SG3.
TP-036-004	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.04	<p>The Parish Council have consistently held the view that growth should be concentrated on the delivery of the garden village, it therefore does not support Approach B as this would result in less control of development between the Garden Village and South Lancaster, eroding important green space,</p> <p>The advantage of Approach C is that it can include future extension of the garden village and exclude the land to the East which is poorly connected. The disadvantage of this approach is that it could provide land for development which may never be needed.</p> <p>Therefore, the geographic scope provided by Approach A would be preferred provide that the future potential direction of development was to the south west of the canal, as per the vision of JTP Masterplan. This approach may rely upon broad assumptions being documented which ensure the delivery of longer term infrastructure and provide the community with a broad understanding of development direction beyond the current Action Plan.</p>
TP-035-004	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.04	Preference for Approach A.
Question T1.5: Do you agree with the proposed starting point in terms of the timescales for the Lancaster South Area Action Plan? If not, please explain your preferred approach and the rationale for your choice.					
TP-001-005	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.05	<p>The County Council acknowledges the rationale behind Approach B which follows national guidance on this matter.</p> <p>Nevertheless, given the strategic infrastructure needs of South Lancaster the forthcoming development plan policy should clearly signpost the likelihood of and need to plan for longer term infrastructure need, in line with Approach C.</p> <p>To this end, the policy should make clear that future development outside the plan period may need to contribute towards strategic infrastructure, even where it has been forward funded and delivered earlier in the plan period.</p>
TP-002-003	Matthew Symons	Hollins Strategic Land	Topic Paper 1	T1.05	HSL considers the timescales described to be reasonable but would welcome a plan period that extends to at least 30 years to allow for the potential expansion of BGV.
TP-004-005	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 1	T1.05	Our clients agree with the Council's preferred approach (Approach B) in terms of the timescales for the Action Plan. It is important that this is consistent with national policy as well as recognising that the development of the Action Plan will facilitate a life span well beyond the Local Plan end date in the early 2030s. The Council may wish to consider an early review mechanism with the Action Plan to provide further flexibility for the Plan to adapt to future change.
TP-007-004		Thurnham with Glasson Parish Council	Topic Paper 1	T1.05	Agreed, however clarification should be given on the following statement 'the growth in South Lancaster will extend before the life-span of the current plan'. What does this mean? Does it mean things will start happening before the Action Plan is agreed?
TP-008-002	Peter Dutton	Gladman Developments	Topic Paper 1	T1.05	The Council should ensure that its proposed plan period is consistent with guidance set out in national planning policy and should consider any implications of the Action Plan enduring beyond the end date of the Council's current Local Plan. Gladman believes that the Council should also consider whether any review or performance mechanisms need to be built into the Action Plan, to offer any means of intervention in the event that proposals come forward at a slower rate than anticipated. This should include a mechanism similar to that found within Policy SG1.
TP-009-004	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 1	T1.05	Our clients support Approach B subject to the Council taking on board Peel L&P's comments that the Whinney Carr site, as an urban extension to Lancaster. They early delivery of dwellings is vital to ensure the Council maintain delivery across the plan period in line with its housing requirement and to remedy the five year supply shortfall and to help meet the Council's wider social, economic and environmental objectives.
TP-012-001	Joanne Harding	Home Builders Federation (HBF)	Topic Paper 1	T1.05	The HBF considers that a 20-year lifespan for the Action Plan would be appropriate, assuming that this is sufficient to cover the development of the sites and it is reviewed regularly to ensure that it remains appropriate throughout that period and is amended or updated as necessary
TP-015-005	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 1	T1.05	The University agrees with Approach B as being the most appropriate time period for delivery. However, there should be allowance for triggers for partial reviews of the Action Plan as part of the implementation and monitoring process. We propose that partial reviews of the Action Plan are undertaken every 5 years throughout its lifetime.
TP-016-005	Warren Hilton	National Highways	Topic Paper 1	T1.05	Point 7.2.4 of the Topic Paper discusses identifying a timeframe for the Action Plan. We agree that a timeframe of between 15 and 20 years represents a suitable time period.
TP-024-005	Alban Cassidy	Cassidy & Ashton	Topic Paper 1	T1.05	It is agreed that Approach B is the appropriate way forward as this accords with National Policy.
TP-029-003	Katrina Barnish	N/A	Topic Paper 1	T1.05	No, the whole planning process should be started again with a genuine commitment to listen to the views of others. Also real solutions should forward to the very valid concerns of the community. The reality has been that no viable or acceptable solutions.
TP-031-005	Simon Bibby	N/A	Topic Paper 1	T1.05	No
TP-033-005	Graham Lamb	Pegasus Group on behalf of Highgrove Strategic Land Ltd	Topic Paper 1	T1.05	We agree that Approach B is the most appropriate starting point in terms of delivery timescales in line with national planning guidance. However, we note the rationale is solely based on the delivery of housing and a residential build rate. We have no issue with the residential build rate as a worst case scenario, however the Action Plan must not use this to apply any sort of phasing that restricts development coming forward sooner.

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Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-036-005	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.05	Approach B ensures that the Action Plan goes beyond the Local Plan perod of 2031 and is of sufficient duration to see through the proposed quantum of development.
TP-037-004	Alice Watson	Natural England	Topic Paper 1	T1.05	We advise that of the plan includes strategic solutions that are required to last longer than the Area Action Plan timescales, then these may need to be secured via different planning obligations, for instance the obligations for BNG will need to be secured for at least 30 years.
TP-035-005	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.05	Preference for Approach B.
Question T1.6: Do you agree with the proposed starting point in terms of the starting point for achieving the quantum of development proposed within the 'Broad Location for Growth' as per the expectations of Policy SG1 of the Strategic Policies & Land Allocations DPD? If not, please explain your preferred approach and the rationale for your choice.					
TP-001-006	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.06	The 3,500 figure in Policy SG1 is only a starting point for assessing the quantum of development in South Lancaster. This figure needs to be critically evaluated in view of the work undertaken for South Lancaster Growth Catalyst to secure the funding necessary for strategic infrastructure. This is vitally important to ensure the deliverability of the infrastructure identified in Policy SG3 and consequently the sustainable implementation of the Development Plan.
TP-004-006	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 1	T1.06	Our clients agree that the provisions of Local Plan Policy SG1 represent the starting point for calculating quantum of development in South Lancaster, noting that the figure is caveated by the words 'at least' recognising that 3,500 units is a minimum figure. It is also clear that this development is for the whole Action Plan area, not just the garden village, although it is accepted this will represent a significant proportion of the overall delivery. Should evidence suggest that further development can be accommodated then this should be considered by the Council to boost the supply of housing within the locality.
TP-007-005		Thurnham with Glasson Parish Council	Topic Paper 1	T1.06	Agreed but all very vague, 3,500+ is all very well but what might an absolute number actually look like?
TP-008-003	Peter Dutton	Gladman Developments	Topic Paper 1	T1.06	<p>Gladman recognise that Policy SG1 sets a starting point of 3,500 dwellings for the South Lancaster area. However, Gladman believe that the Coucnil should not be constrained to a particular target or requirement and should instead adopt an holistic approach to the identification of development opportunities. This in turn will determine the minimum quantum of development that should be delivered and allocated in the Action Plan.</p> <p>In exploring opportunitied, Gladman believe that the Council must als consider the role that allocations can play to meet the district's housing needs. To achieve, Gladman believe that the Council must not concentrate development in one location, such as the garden village, but instead direct development to a range of sites and sustainable locations within the South Lancaster area. In this context Gladman believe that the Council must take into account the contribution that some sites can make to short-term delivery to meet housing needs now.</p>
TP-009-005	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 1	T1.06	It is essential that the Council ensures the delivery of at least 3,500 dwellings within the Action Plan area, including 1,205 within the plan period. To assist officers Peel L&P have provided indicative forecasting of how the Whinney Carr site could come forward. This clearly demonstrates that subject to securing planning permission this site can help meet short term housing requirements.
TP-015-006	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 1	T1.06	The starting point should be the position which is set out in the Local Plan and Policy SG1 rather than having a higher starting point established in documents which have limited planning weight. The approach of using Policy SG1 is less suceptible to challenge as it is based on the formal plan position which has already been through the plan-making process.
TP-023-002		Lancaster Civic Vision	Topic Paper 1	T1.06	We welcome the approach to housing numbers set out in Topic Paper 1 which regards the figure of at least 3,500 homes as a starting point. However, we have difficulty this reconciling this with the decision of the Council in August 2021 to sign the HIF Collaboration Agreement which was predicated on the prospect of over 9,000 additional homes in South Lancaster. We believe that in accepting that decision the Authority is faced wiht enabling the provision of 9,000 new homes or accepting the financial consequences of failing to do so. We are dubious that the two sets of considerations can in reality be kept separate.
TP-024-006	Alban Cassidy	Cassidy & Ashton	Topic Paper 1	T1.06	It is agreed that the proposed starting point of at least 3,500 homes is appropriate as this accords with adopted development plan policy.
TP-031-006	Simon Bibby	N/A	Topic Paper 1	T1.06	I do not agree with the 'Broad Location for Growth' .
TP-033-006	Graham Lamb	Pegasus Group on behalf of Highgrove Strategic Land Ltd	Topic Paper 1	T1.06	We have no specific issue with the 3,500 quantum figure given its basis in Policy SG1, however this should be supported by some sort of quantum figure relating to employment land based on Policy SG's approach to employment / job creation.
TP-036-006	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.06	The Parish Council have consistently backed the concept of a garden village, opposed to any urban encroachment. As such the Parish Council supports Spatial Option 1 of the 2018 consultation which identified the development of 2,500 new homes. The Council believe the Local Plan target of at least 3,500 new homes is a Westminster imposed housing target and should be disregarded. A 3,500 figure would require substantial development outside of the garden village which would undermine the viability of the garden village by diverting growth away from it. In addition, scattering developent will increase the spend on infrastructure, consequently damaging viability. The Parish Council therefore propose that the quantum should be in the region of 2,5000 new houses, or if the geographic scope including a wider expansion area to the south west then the quantum should be in the region of 5,000.
TP-035-006	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.06	We struggle to understand how the various numbers quoted in the draft Topic Papers were arrived at and, critically, what is the final agreed number and how it was calculated. Even allowing for the removal of the southern area of the projected development in the JTP Masterplan, there are still a variety of figures in this document from 2,500 to 4,300 homes (Local Plan) to 5,000 homes (Masterplan). This is set against the requirements of the HIF bid to deliver around 9,000 homes.
Question T1.7: Do you agree with the proposed starting point in terms of the provision of a diverse mix of development densities within the 'Broad Location for Growth'?					

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Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-001-007	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.07	No. The County Council considers that further evidence is required to dismiss Approach A as the preferred way of securing the optimum quantity and mix of development within the Action Plan area. The County Council considers Approach A is more likely to facilitate an optimum quantum of development that ensures that densities are maximised in the appropriate locations as well as to realise the benefits of place-making and sustainability of services. The County Council is concerned that Approach B is not proactive enough in optimising development opportunities. Furthermore, the County Council are not persuaded that Approach A would compromise the objectives of Approach C (the creation of GBI). This is because Approach A would be subject to the same development constraints, such as topography.
TP-003-001		Bailrigg Village Residents Association	Topic Paper 1	T1.07	We note that there will be a Partial Review of the Action Plan in light of the Cimate Emergency but that strategic questions of housing density will not be addressed. Surely this lack of focus will reduce the value of any review, which should also be looking at the effects of the cost of living crisis.
TP-004-007	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 1	T1.07	Our clients agree with the Council's intention to look towards striking a balance between high and low densities whilst also seeking to create a diverse mix of housing whilst also looking to opportunities to increase the provision for GBI. It is important that the conclusions that the Council reaches in terms of development densities are based on appropriate evidence which considers multiple options and development scenarios. The topic paper looks at the JTP Masterplan (which is not based on robust evidence) as a measuring stick of what could be achieved within the designaiton, without fully considering other options or the wider Action Plan area. The Council should start to consider the Action Plan area as a whole before discussing specific areas such as the garden village.
TP-007-006		Thurnham with Glasson Parish Council	Topic Paper 1	T1.07	There is a presupposition that there is a need for houses to be built in the South Lancaster area without first idenifying a need for them or who will buy or rent them. Is there an expectation that 'local' people will buy them or will people be imported in from surrounding areas such as Manchester. What are the demographics of the people buying properties? It is not clear how 'high density development' can align with the creation of a garden village and likewise 'low density development' aligns with the need for affordable housing?
TP-008-004	Peter Dutton	Gladman Developments	Topic Paper 1	T1.07	Gladman recognise the importance of delivering a wide choice of housing to meet local needs and note the intention of the Council to prepare a Housing Strategy. Gladman would be grateful to review this evidence once published.
TP-009-006	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 1	T1.07	Our clients support Approach B in that the Action Plan should look towards a balance of high and low density across the whole area, seeking to maximise opportunities in appropriate locations. Peel L&P agree that further work is needed to determine appropriate densities for each parcel identified and it will be important to maintain flexibility to able to respond appropriately to presently unknown constraints and / or opportunities.
TP-023-003		Lancaster Civic Vision	Topic Paper 1	T1.07	We applaud the Council's ambitions to deliver housing quality design and environmental standards. However, as significant proportion of land in South Lancaster is under the ownership of volume housebuilders we anticipate pressure from those parties to undermine this ethos. We would seek reassurance that the various controls referred to in the Topic Papers to ensure that the basic design and environmental principles of the Garden Village can be effectively imposed on developers.
TP-029-004	Katrina Barnish	N/A	Topic Paper 1	T1.07	I agree that a diverse mix of houses / accommodation should be built but this should be across the whole area. We are no longer required to have a specific area for growth and people should get a choice where they live.
TP-036-007	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.07	Approaches A and C are at the opposite ends of the spectrum and both are unrealistic. A balanced garden village should always have neighbourhoods of different densities and therefore Approach B is the only sensible approach.
TP-035-007	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.07	The Council's approach seems sensible, however given the pressure on water services and flood mtigation Approach C ultimately might have to be implemented.
Question T1.8: Do you agree with the proposed starting point in terms of the provision of a diverse mix of development densities within the 'Broad Location for Growth'?					
TP-001-007	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.08	The City Council's starting point for considering the mix of developent densities is lacking in detail so it is difficult to come to a firm decision on this matter. However, the County Council strongly agrees that the decisions on the type of development proposed will be informed through discussions with key stakeholders. The County Council would like to underscore its role as such a stakeholder in its capacity as highway, flood and education authority.
TP-002-004	Matthew Symons	Hollins Strategic Land	Topic Paper 1	T1.08	HSL agrees that the garden village must deliver the type of housing that is needed in South Lancaster, HSL has met with the Council to discuss opportunities for community-led housing and is open to considering the delivery of self-build homes and homes for older people wihtin their land interests in South Lancaster.
TP-003-002		Bailrigg Village Residents Association	Topic Paper 1	T1.08	Data from the 2021 Census shows that the area has an ageing population with the number of over-65s increasing from 18.3% in 2011 to 20.5% and the housing mix should reflect this both in terms of housing and transport.
TP-007-007		Thurnham with Glasson Parish Council	Topic Paper 1	T1.08	Since it is not clear who will be living in the South Lancaster area, it is not clear what employment opportunities would be suitable.

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TP-015-007	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 1	T1.08	The university seeks recognition that within the Action Plan that student accommodation is suitable for delivery within Lancaster South. The Action Plan should recognise the delivery of student accommodation and the strong preference for this to be located primarily at the Bailrigg Campus and other appropriate locations within the wider University estate. It is critical that residential development under this use class needs to be retained and not diluted through the use of permitted development rights.
TP-029-005	Katrina Barnish	N/A	Topic Paper 1	T1.08	No, the 'Broad Location for Growth' is no longer valid in the current and changing future circumstances.
TP-031-008	Simon Bibby	N/A	Topic Paper 1	T1.08	No
TP-035-008	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.08	Hard to disagree with the proposed mix although the likelihood of high costs and developer unwillingness to build affordable housing makes this an aspiration rather than a likely end-point.
Question T1.9: Do you consider that the Area Action Plan should seek to allocate land for employment purposes in South Lancaster? What types of employment should be promoted in this location and why?					
TP-001-008	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.09	The County Council are broadly aligned with the approach set out in the Economic Prosperity Strategy but requests that employment land uses are approached flexibly so they are adaptable to changing economic market conditions. In addition, the County Council requests that consideration of the location and type of development uses addresses the wider supporting infrastructure need and is carefully integrated with the wider transport analysis. Crucially, the Action Plan should ensure that any employment allocations make a fair and proportionate contribution to strategic infrastructure delivery.
TP-002-005	Matthew Symons	Hollins Strategic Land	Topic Paper 1	T1.09	HSL agrees that in order to achieve a sustainable community, residents must have access to employment opportunities, however it is important that this is the right type of employment which aligns with the principles of delivering a garden village. Heavy industrial and warehouse development would not achieve the objectives of the garden village and the Council should be flexible in terms of the employment offer it provides, including the opportunities for home working. HSL is not adverse to considering employment uses within their land interests, including the siting of a local centre.
TP-004-008	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 1	T1.09	Our clients consider the provision of employment development should be consistent with that identified in Policy SG1 of the Local Plan. It is clear that whilst it is the primary purpose of the Action Plan to deliver new housing, there should also be an aspect of employment. Our clients have no specific comments on the nature of employment that should be considered but would suggest this should be based on market factors with supporting evidence of market demand and need. The proximity of the university and the desire to deliver the Health Innovation Campus could provide economic opportunities within the locality.
TP-009-007	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 1	T1.09	It is considered that a local centre should be provided within the garden village. However, this should not preclude the development of small community or commercial facilities elsewhere in the South Lancaster area.
TP-015-008	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 1	T1.09	In order to align with Policy SG1 the Action Plan should not be exclusive related to housing development. The Plan should maximise the opportunity presented by the University facilities and should encourage economic development in this area, linked to the Health Innovation Campus. Identifying areas for economic development as well as specifically for the development and growth of the University estate.
TP-016-006	Warren Hilton	National Highways	Topic Paper 1	T1.09	It is important to note there are few allocations for employment made within the Local Plan. National Highways considers that having large areas of land for employment purposes could have a detrimental impact on the Strategic Road Network (SRN). We feel that allocating some areas of land for employment purposes would have merit in economic terms and could present the opportunity for a reduction in trips through reduced commuting, however the focus should be on small enterprise opposed to large sheds or logistic uses which have a larger footprint and lower density. Opportunities should be explored to improve digital connectivity and provide shared workplace hubs. A local retail offer which would include employment is also deemed suitable in this location.
TP-024-007	Alban Cassidy	Cassidy & Ashton	Topic Paper 1	T1.09	It is essential that the Action Plan allocates land for employment purposes. For development to be truly sustainable it is important that it provides a variety of uses to prevent it becoming a dormitory settlement.
TP-029-006	Katrina Barnish	N/A	Topic Paper 1	T1.09	Land should be allocated for employment purposes across the whole of the Lancaster area and not just South Lancaster.
TP-031-009	Simon Bibby	N/A	Topic Paper 1	T1.09	No

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Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-033-007	Graham Lamb	Pegasus Group on behalf of Highgrove Strategic Land Ltd	Topic Paper 1	T1.09	<p>It is our strong view that the Action Plan should seek to allocate land for the full range of employment purposes, including small scale and larger scale opportunities. Whilst we note that the Council's recent 'Economic Prosperity Study' includes that the Garden Village does not need to be supported by large format B2 and B8 uses, on the basis there are better places to deliver such uses.</p> <p>We have several concerns with this, firstly in respect of labour supply of the Council is committed to sustainability it should take every opportunity to locate new homes close to new employment, failure to do this may increase the need to travel. Secondly, in terms of the existing supply there is conflicting evidence in the Council's most recent 2021 Annual Monitoring Report which confirms there has been a significant reduction in the number of planning application which would result in new employment floorspace. The Council point to wider macro-economic challenges and whilst we do not dispute this view, recovery has been stronger elsewhere in the region which suggests that supply in this area is constrained. Thirdly, there are questions over the viability of small scale employment delivery and they tend to be only commercially viable in specific locations and circumstances.</p> <p>The papers fail to take account for the important role that new employment sites along the route of the link road that can play in heling to deliver that infrastructure.</p>
TP-036-008	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.09	<p>A critical part of sustainable developemnt is that is contains employment opportunities so that the residents do not need to travel long distances. The Parish Council wishes to see the Innovation Campus as a prime locations for employment. The Campus is only 25% developed and the University and City Council must work together to realise its potential. The University has expanded over the years but further expansion should not be as the cost of the unique character of Bailrigg and Ellel. In addition there should be commercial offices in the garden village as well as shops and places to eat, these should be flexible places. Although food production is to be encouraged there ought to be one or two industrial pockets which consist of small scale workshops. Coupled with home working, it would be helpful if the Action Plan had a target, say 50% of households within 2km of their employment.</p>
TP-035-009	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.09	<p>Yes, employment opportunitied should be an integrated part of any development. Employment development should be sustainable and not attract high levels of traffic flows to add to existing transport problems.</p>
Question T1.10: What do you consider the key elements of a local centre to consist of? Do you agree that it should be located centrally within the new Garden Village?					
TP-001-009	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.10	<p>As with employment uses, the County Council request that consideration of the location and type of a local centre remains firmly focused on the supporting infrastructure needs and is carefully integrated into the wider transport analysis. Development of a local centre may also need to contribute fairly and proportionately to strategic infrastructure delivery.</p>
TP-002-006	Matthew Symons	Hollins Strategic Land	Topic Paper 1	T1.10	<p>It must be acknowledged that the likely phasing of the garden village will be from the eat and west simultaneously. It is likely that a local centre will be delivered in the latter stages of development when the necessary footfall is in place. HSL would consider the provision of small centre within their land interests as part of early delivery of community facilities in South Lancaster</p>
TP-004-010	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 1	T1.10	<p>The garden village should clearly accommodate a significant proportion of the new population within the Action Plan area. However, at this stage there is no evidence to suggest thay it the most suitable location for a local centre to be provided and a wider masterplanning exercise for the whole Action Plan area would be encouraged in order to determine the most suitable location. This is particularly pertinent given the constraints within the 'Broad Location for Growth'.</p>
TP-005-004	Christopher Carroll	Sport England	Topic Paper 1	T1.10	<p>To promote activity and sustainability, Sport England are of the opinion that leisure faicilities should be centrally positioned and easily accesible.</p>
TP-007-008		Thurnham with Glasson Parish Council	Topic Paper 1	T1.10	<p>The garden village requires at least one large supermarket otherwise it will promote exessive levels of journeys across the City Centre and across the River Lune.</p>
TP-009-008	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 1	T1.10	<p>Our clients agree the main centre should be located centrally with the garden village and it should meet the needs of the local residents without competing with Lancaster City Centre. This should not however preclude the development of smaller community facilities elsewhere. High quality pedestrian, cycle and public transport will help ensure easy and sustainable access to wider areas.</p>
TP-015-009	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 1	T1.10	<p>The University strongly agrees that a local centre should be provided and the Action Plan should look at whether one centre is sufficient to meet local needs. The main local centre should include school, healthcare, a small element of retail, community facilities, open space and sports facilities. This will reduce pressure on existing services. The development of a local centre should not preclude additional future retail provision which serves the distinct catchment of students, staff and visitors which is separate to the garden village. In addition, new retail development should not conflict or compete wiht the provision at the University.</p>
TP-024-008	Alban Cassidy	Cassidy & Ashton	Topic Paper 1	T1.10	<p>A local centre should have a mix of uses beyond simply retail, provision should be made for medical facilities and community uses such as a village hall. The key to location is not simply to have a central location but to have a accesible locaton. Given the difficulty in making small developments viable, it may be sensible to create in a location where it is also visible / accessible to users of the A6 and even the University. It would make sense to create an initial centre in such a location with a secondary centre being created at a later date.</p>

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Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-029-007	Katrina Barnish	N/A	Topic Paper 1	T1.10	Central facilities in the new areas should consist of shops, cafes, healthcare, fitness, community facilities, library, play facilities, pubs and green spaces.It should be the priority of the Council to restore and improve facilities across the existing areas before investing in communities that don't exist.
TP-030-002	Louise Gill	RSPB	Topic Paper 1	T1.10	A local centre should include doctors, dentist, schools, food shops, cafes an other shops located within walking distance.
TP-031-010	Simon Bibby	N/A	Topic Paper 1	T1.10	I find the name 'garden village' nothing but a cheap euphemism for senseless urban sprawl.
TP-033-008	Graham Lamb	Pegasus Group on behalf of Highgrove Strategic Land Ltd	Topic Paper 1	T1.10	Given the large area which is covered by the Action Plan and the scale of housing proposed, a single centrally located centre may not be the most appropriate or sustainable solution. Indeed, two smaller centres distributed through the area could offer a more sustainable alternative.
TP-036-009	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.10	The JTP location for a local centre seems sensible. A second centre would be required for expansion west of the canal. The centre shoul include shops, commercial premises, community buildings, cafes and large open space for gatherings and markets serviced by bus stops and car parking. The latter should be a short walking distance from a primary school.
Question T1.11: Do you agree with the proposed starting point in terms of the identification of Areas of Separation? If not, please explain your preferred approach and rationale for your choice.					
TP-001-010	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.11	The County Council consider that more case studies should be considered to evaluate the relative costs and benefits to Approach A and Approach B. The County Council have some concerns around the rigid adherence to defined development boundaries in terms of stifling innovation and artificially confining growth that may be capable of being managed through a more flexible, criteria-based approach. The County Council would like more information on the proposed areas of separation so these can be analysed against housing delivery expectations.
TP-002-007	Matthew Symons	Hollins Strategic Land	Topic Paper 1	T1.11	HSL would support the creation of an Area of Separation north of their land interests, the JTP masterplan recognised that this could be formed by preventing built development north of Carr Lane which would provide a significant area which would ensure HSLs land interests were viewed as a separate entity to the urban extents of Lancaster.
TP-004-011	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 1	T1.11	<p>Our clients agree that any areas of separation should be defined within the Action Plan and this will provide clarity over development anticipated within the wider designation. The JTP Masterplan however does not provide the appropriate basis for the consideration of the area of separation, as asserted at paragraph 1.1.2 of the topic papers. The JTP masterplan is not consistent with the broad location for growth identified in Policy SG1 and although it may provide a basis for consideration of the garden village, it doesn't consider the wider area.</p> <p>In moving forward the Council to undertake a fresh masterplanning exercise, consistent with the area designation under Policy SG1.</p>
TP-007-009		Thurnham with Glasson Parish Council	Topic Paper 1	T1.11	Approach B is preferred.
TP8-008-005	Peter Dutton	Gladman Developments	Topic Paper 1	T1.11	<p>Gladman note references to the use of separation within Topic Paper 1 refer to areas of separation which appear to be orientated towards the proposed garden village. In this respect, Gladman have concerns with the identification of land for urban extensions outside of the proposed garden village site.</p> <p>In this context, Gladman believe that the potential allocaiton of urban extensions and the ability to deliver sustainable development in other areas of South Lancaster must be factored into the exploration of Areas of Separation and suggest these opportunities are not inhibited or overlooked when exploring this matter.</p> <p>Gladman note the Council's preference to allocate Areas of Separation to the North and South of the garden village, as opposed to using a criteria-based approach. Gladman believe that achieving the perception of separation, physical separation and suitable buffering can be achieved without the need for significant physical features. Gladman note that the Council have appointed external consultants to assess this subject in more detail, Gladman would welcome the opportunity to view this evidence when published.</p>
TP-009-009	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 1	T1.11	Our clients support Approach B, caveated that it is important that the Council clarifies how large the buffers might be and the extent of land it is expected to cover. Peel L&P is pleased that the Council have engaged external consultants to explore this matter and would welcome the opportunity to discuss the outcomes of this work. Consideration should be given to using small part(s) of the Burrow Beck area for other complimentary uses, for instance recreational purposes. This area will look to provide a purposeful green buffer with multi-functional purpose.

SUMMARY OF RESPONSE TO **TOPIC PAPER 1: OVERALL DEVELOPMENT STRATEGY** - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-011-001	Stephen Harris	Emery Planning on behalf of Wainhomes	Topic Paper 1	T1.11	<p>With regard to identifying areas of separation, the broad concepts can be identified in Figure 5.2 and we have considered the three approaches which have been identified in the Topic Paper. Notwithstanding our position that our clients land should not be defined as an Area of Separation, we consider the criteria-based approach to control development as identified in Approach A is the most appropriate. Such a policy is set out in many development plans which, whilst defining a green gap / wedge / buffer, they do facilitate development.</p> <p>Approach B is not effective or justified as it would preclude sites coming forward for development and would not result the coalescence or loss of identify of a specific settlement. The Action Plan should not prohibit development by defining an Area of Separation unless there is a significant risk of coalescence occurring. We consider that in conjunction with flood risk would encircle Galgate and prevent and further growth which is not a proposition that can be considered reasonable or appropriate.</p> <p>As we have set out in separation submissions (i.e. Landscape and Visual Appraisal which supports our planning applications for our land interests) we have demonstrated that our clients site would not create coalescence or intervisibility between the Garden Village and Galgate. Going forward it is imperative that land parcels or specific development parcels are assessed by the Action Plan priorto any Areas of Separation bein defined. Land which is not required or would appear to serve no separation role would be left as open countryside which then has its own policy protection.</p>
TP-015-010	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 1	T1.11	<p>The University agrees that Approach B would be the most appropriate starting point. However, the areas of separation identified should show separation from the Lancaster University Bailrigg Campus. The campus is not referred to in Approach B. To establish buffers around the garden village the City Council should look at existing physical barriers. The buffers, once established, should not limit the deveopment and expansion of the University Campus.</p>
TP-024-009	Alban Cassidy	Cassidy & Ashton	Topic Paper 1	T1.11	<p>It is recognised that some communities wish to retain their own identity but this is less essential for sustainable development and it may be appropriate to consider a more consolidated approach where development is integrated within the existing built up areas and University. A modest belt of open land can be retained north of Galgate but there is no justification in maintain separation from Lancaster or the University itself. Indeed to do so would result in a less efficient use of land.</p>
TP-029-008	Katrina Barnish	N/A	Topic Paper 1	T1.11	<p>This question is not considered to be relevant as the so called Areas of Separation have already been built, or plan to be built on. Any land left between areas will likely be unsuitable for building. Specific areas of separation could mean that communities are isolated with residents unable to easily access facilities.</p>
TP-031-011	Simon Bibby	N/A	Topic Paper 1	T1.11	No
TP-036-010	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.11	<p>The Parish Council agree with the conclusion of para 11.5.2 with the proviso that the areas of separatio explicitly apply to existing settlements, notably Bailrigg Village, Lower Burrow and Burrow Heights as recognised in Policies SG1 and EN6 of the Local Plan. These areas should be substantial to give a sense of leaving one place and entering another and be visually separate. The description of Burrow Beck as a 'corridor' is inappropriate and should be referred to as a 'valley' to give a larger sense of scale for any area of separation proposed. The Parish Council believes that a conservative approach to areas of separation are required in the Action Plan because once an area is developed it is virtually impossible to reverse the loss of separation.</p>
TP-035-010	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.11	<p>We support Approach B. Existing settlement should have their character and environments protected from development. As a parish on the western boundary of the Action Plan area we would also strongly support an area of separation to the west (i.e. east of the A588) as a number of dwellings and businesses in the Parish would have noise and visual impacts. We would wish to be consulted on the design and siting of these areas of separation.</p>
Question T1.12: Do you agree that the Area Action Plan should consider development opportunities for urban extensions beyond development of a Garden Village? Please explain your rationale for your opinion.					
TP-001-011	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.12	<p>Yes. The County Council considers that development opportunities outside the Action Plan area should be considered in the context of the South Lancaster Growth Catalyst. The forthcoming development plan should make clear that development outside of the Action Plan area, but benefiting fom strategic infrastructure, should make fair and proportionate contributions towards it. The possibility of forward funding delivery of such infrastructure should be expressly acknowledged in the policy and recovery via developer contributions should be facilitated, irrespective of when development comes forward.</p>
TP-004-012	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 1	T1.12	<p>Our clients agree that the Action Plan should consider development opportunities for urban extensions and that this should be underpinned by a fresh masterplanning exercise that considers the whole SG1 area. This should consider multiple development options before stating a preferred option - all of which should be subject to public scrutiny.</p>
TP-007-010		Thurnham with Glasson Parish Council	Topic Paper 1	T1.12	<p>The Topic Papers do not show a need to expand the garden village area and whether future expansions would have to adhere to garden village concepts.</p>
TP-008-006	Peter Dutton	Gladman Developments	Topic Paper 1	T1.12	<p>Gladman strongly support the consideration of land at Bailrigg Lane to be identified as part of an Urban Extension within the Action Plan. Gladman believe there is strong rationale for identifying this land as part of the Action Plan process. Delivery of this site would assist in the meeting short-term housing needs. To meet such needs, it is important that the Council identifies sustainable development opportunities that compliment the wider delivery of the garden village. Gladman are seeking to actively promote this area of land for development with a proposal for 644 dwellings currently with the Council.</p>

SUMMARY OF RESPONSE TO **TOPIC PAPER 1: OVERALL DEVELOPMENT STRATEGY** - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-009-010	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 1	T1.12	Our clients strongly agree that the Action Plan should consider the development of the Whinney Carr site as an urban extension to Lancaster.
TP-011-002	Stephen Harris	Emery Planning on behalf of Wainhomes	Topic Paper 1	T1.12	<p>We consider that the process of investigating urban extension opportunities should not be restricted to South Lancaster but should be extended to include Galgate. This is important for housing delivery across Lancaster which has a substantial housing shortfall by also ensure Galgate's vitality and viability. Policy SP2 identifies Galgate as a sustainable settlement.</p> <p>Galgate is a settlement which should be a focus for growth, however there are limited opportunities for that to occur given flood risk. This therefore leads to exploring opportunities to the north of Galgate, including our clients land which is north of Highland Brow. It is our view that land in this area can adequately incorporate development and provide sufficient space to provide an effective green gap between Galgate and new development further to the north which forms part of Bailrigg Garden Village. Therefore if Approach B is pursued then there is no evidence that our clients land should be included in the Area of Separation Designation.</p>
TP-024-010	Alban Cassidy	Cassidy & Ashton	Topic Paper 1	T1.12	It would be sensitive to consider future extensions. Concentration should be on any infill within the existing built up areas rather than simply any extensions west into the open countryside.
TP-029-009	Katrina Barnish	N/A	Topic Paper 1	T1.12	Increasing population in existing areas would help to provide a more vibrant communities and essential resources including new or expanded schools and health facilities.
TP-030-003	Louise Gill	RSPB	Topic Paper 1	T1.12	No, there are sensitive areas around this development site including Conder Green Wetlands which need to be protected. The massive increase of people will have adverse impacts on these areas, therefore new developments should be planned elsewhere to spread out the burden.
TP-031-012	Simon Bibby	N/A	Topic Paper 1	T1.12	No
TP-036-011	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.12	The Parish Council agree that the Action Plan should assess all land within the SG1 designation for its value for development or for GBI potential. The Parish Council have consistently said that the planning application advanced by Gladman should be considered as part of the Area Action Plan as it relies on infrastructure which will only be delivered by that Plan. The Parish Council believe no urban extension areas should be identified until the garden village is fully implemented
TP-035-011	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.12	Our comments are based on the principles that we do not believe that development in South Lancaster should be anything like the scale being proposed. We would not wish to see any additional development on Whinney Carr or Bailrigg Lane, however if these are to be included in the Action Plan then at least any development should have to comply with the design principles of the garden village. Regarding Whinney Carr, if the garden village is built would this land not be in the proposed 'Green Halo'?
Question T1.13: Do you agree that a Phasing Plan is a critical component of the future Area Action Plan, have you any views on how phasing should be dealt with in South Lancaster in terms of the approaches taken?					
TP-001-012	Marcus Hudson	Lancashire County Council	Topic Paper 1	T1.13	Yes. The County Council agrees that a phasing plan is a critical component of the Action Plan. The County Council would wish to underscore it is a key stakeholder in the discussions around highway matters, flood and education. The phasing plan will need to be developed with a view to the content of the South Lancaster Growth Catalyst. The phasing plan will be crucial in informing the City Council's approach to Section 106 obligations and the role of any framework agreement required with developers.
TP-002-008	Matthew Symons	Hollins Strategic Land	Topic Paper 1	T1.13	<p>A phasing plan is important to the delivery of the garden village. It must set out the housing elements which will be delivered during the plan period and has to be informed by a logical plan for the delivery of housing which secures the much needed homes as quickly as possible. The delivery of the garden village is entirely reliant upon the delivery of the required highways infrastructure which are key components which must inform phasing.</p> <p>The Council cannot afford to deliver the garden village from the centre outwards, with the central element unlikely to be delivered until the back end of the construction period. This would cause significant delays to housing delivery. Rather, the Council should follow the phasing of the road infrastructure, development should commence from the land in HSL interests to the west and simultaneously to the east.</p>
TP-004-013	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 1	T1.13	Our clients consider that the phasing of development is an essential component in the delivery of growth. The issue of phasing requires a wider discussion with stakeholders, including landowners, developers and statutory bodies, to ensure that the area can develop in an appropriate and timely manner, as well as ensuring that infrastructure can be appropriately phased so that it does not place any undue financial burdens on the development industry, leading to delays. At this stage it is important that the Action Plan remains as flexible as possible in the respect of phasing to allow it to adapt to changing circumstances.
TP-005-005	Christopher Carroll	Sport England	Topic Paper 1	T1.13	Sport England are of the opinion that a phasing plan will be a critical component of the Action Plan, particularly as and when and where the necessary outdoor and indoor sporting facilities are to be delivered.
TP-008-009	Peter Dutton	Gladman Developments	Topic Paper 1	T1.13	Gladman note that it is intended that any phasing plan will evolve with key stakeholders, including the development industry and infrastructure providers. Gladman would welcome the opportunity to be involved in these discussions. The Council should ensure that any proposals for phasing are appropriately evidenced. Where it can be demonstrated that a site can be delivered without the need for phasing then no such phasing constraints on its build-out or the point at which development can commence or come forward. Such constraints could unnecessarily restrict the supply of housing to meet the authority's needs. Any provisions should include the flexibility to deviate from the phasing programme.

SUMMARY OF RESPONSE TO **TOPIC PAPER 1: OVERALL DEVELOPMENT STRATEGY** - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-015-011	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 1	T1.13	The University considers phasing is key, particularly in ensuring that required infrastructure is delivered when needed and not towards the end of development when less suitable journey patterns to other locations have already been established. There is a clear need for the Council to establish triggers in the Action Plan, in terms of numbers of residential units that will be required linked to the provision of new infrastructure.
TP-024-011	Alban Cassidy	Cassidy & Ashton	Topic Paper 1	T1.13	A phasing plan would be appropriate and should be baed upon the construction of the link road with development starting at the South-Eastern corner of the proposed village. This will ensure the necessary infrastructure us provided rather than being car dependent being developed in the middle of the Action Plan area.
TP-029-010	Katrina Barnish	N/A	Topic Paper 1	T1.13	If the plan is continued if should be rolled out in a very gradual way with specific targets. This would lead to evaluation of progress made and revision of future plans in light of progress.
TP-030-004	Louise Gill	RSPB	Topic Paper 1	T1.13	Yes, it is important to ensure building work isn't being undertaken everywhere at once, allowing space for wildlife. It is critical the required service are planned for in the first phase including schools, doctors and dentists.
TP-031-013	Simon Bibby	N/A	Topic Paper 1	T1.13	No
TP-036-012	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.13	A phasing plan is vital, in the case of the Action Plan it is vital that the infrastructure is delivered before residential and commercial development otherwise there is no sense of place or community. The principal should be that new properties join a communtiy rather than site in a field where occupants have to drive elsewhere for amenities. It is recognisesd that some infrastructure may appear oversized until housing catches up and it is important that this is masked, for example roads built ahead of time should be masked by hedges.
TP-035-012	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.13	Agree, although phasing will in all likelihood come down to delivery of infrastructure and money rather than planning principles.
Question T1.14: Are there are any other points you wish to raise which have not been captured in responses to other questions in this Topic Paper?					
TP-005-006	Christopher Carroll	Sport England	Topic Paper 1	T1.14	It is unclear whether the Action Plan will include any site allocation for sporting facilities and if any education requirements will also have sporting facilities to support the wider community. It is essential that Lancashire County Council are involved in the preparation of the Playing Pitch and Outdoor Sports Strategy.
TP-007-011		Thurnham with Glasson Parish Council	Topic Paper 1	T1.14	<p>The paper talks at times about the 'Broad Location for Growth', South Lancaster and the Bailrigg Garden Village, are these terms synonymous or is there a degree of difference between them? Mention is made of a desire for a country park and sports pitches, but it is never made clear whether these would be located within the 'Broad Location for Growth or could be developed within Phase 2?</p> <p>Our understanding is the entire scheme for South Lancaster is predicated on the sale of houses to justify the work to Junction 33 of the M6.</p>
TP-029-011	Katrina Barnish	N/A	Topic Paper 1	T1.14	The whole plan needs to be restarted again from scratch. South Lancaster now needs to be considerably smaller and should only go ahead following genuine consultation. I would suggest a citizens assembly is formed to scrutinize the public consultation, rather than being left to external consultants.
TP-031-014	Simon Bibby	N/A	Topic Paper 1	T1.14	In agreement with the vast majority of South Lancaster residents I am not in agreement with any further housing or commercial development in the area.
TP-036-013	Paul Holland	Scotforth Parish Council	Topic Paper 1	T1.14	The Parish Council wish to see the Action Plan to include a process that equitably shares out the social costs and reasonable commercial profit amongst all landowners and developers so that all gain equally, regardless of what their land is being used for. This would incentivise developers to ensure that the Action Plan places the garden village and development where the Council(s) want it, ahead of any frantic competition to build as many houses as possible on their own patches of land.
TP-037-005	Alice Watson	Natural England	Topic Paper 1	T1.14	<p>Natural England advises the Action Plan provides an opportunity to implement a strategic solution to help address disturbance via recreational pressure on nearby sites (and land which is functionally linked to those sites) associated with increased residential development.</p> <p>We acknowledge that the Habitats Regulation Assessment (HRA) includes mitigation options, however we advise the Action Plan represents an opportunity to create a overarching strategy which will help to mitigate the current ongoing issues of recreational disturbance. An example where this has worked well is the Thames Basin Special Protection Area Avoidance Strategy. Natural England advise that Accessible Natural Green Space Standard (ANGSt) could be a useful tool to use when assessing open space and residential development.</p>
TP-035-013	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 1	T1.14	The maps presented in this Topic Paper are out of date. For example, we know that the latest plans from Lancashire County Council show roads and a Park & Ride facility in different locations. The paper needs to show the most up-to-date maps and plans in order for respondents to make informed comments.

SUMMARY OF RESPONSE TO **TOPIC PAPER 2: TRANSPORT AND TRAVEL** - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
GENERAL COMMENTS TO TOPIC PAPER 2					
TP-008-010	Peter Dutton	Gladman Developments	Topic Paper 2	T2.00	<p>With regard to travel and transport, Gladman notes that the City Council are intending to prepare their own highways assessment alongside the preparation of the Action Plan. However, it is not clear how this overlaps with the work undertaken by Lancashire County Council. Gladman believe their site interests at Bailrigg Lane provide positive opportunities for sustainable travel links for public transport, cycling and walking.</p> <p>With regard to car parking standards, it is important that the Council strike the right balance between promoting sustainable travel and meeting the day-to-day needs of new residents, this is similarly the case with the role of modal shift. Setting overly ambitious targets could result in unrealistic or unacheivable positions with adherence to targets ultimately dependent on individual travel habits. An iterative approach which seeks to encourage modal shift by the delivery of proportionate infrastructure with further monitoring may be appropriate.</p>
TP-010-002	Tim Bettany Simmons	Canal & Rivers Trust	Topic Paper 2	T2.00	<p>We consider that improvement to the canal towpath wihtin the vicinity of the site to be delivered through the development would be critical to maximise the role and potential for the canal corridor to contribute to sustainable travel links.</p> <p>As previously advised, towpath improvements could have positive results for existing and new residential areas to support active travel and contribute to a longer-term version to link up with local residential areas through high quality walking and cycling routes. The increased use of towpaths for walking and cycling is highly effective at improving well-being.</p>
TP-013-001	J Davies	Lancaster Bus Users Group	Topic Paper 2	T2.00	<p>The document restates the key challenge of improving the highway capacity on the A6 corridor. This appears to accept a significant increase in traffic as inevitable. The improvements to the strategic infrastructure could lead to the improved operation of buses through Galgate.</p>
TP-013-002	J Davies	Lancaster Bus Users Group	Topic Paper 2	T2.00	<p>There are a number of discrepancies in the Topic Paper in relation to the number and operator bus services, these should be rectified.</p> <p>Section 5.3 sets out the City Council's responsibility towards public transport, which appear to be primarily around ensuring new developments are accessible to public transport, it does not however appear to recognise the Council's role in providing bus infrastructure, such as Bus Shelters.</p> <p>Figure 5.3 suggest that the garden village will be served by an extension of existing services to the University, whilst technically feasible there are a number of issues:</p> <ul style="list-style-type: none">- Existing services to the University struggle to cope with demand during term time.- Buses would have to enter the new village via the A6 and leave via the A588 or vice versa, it is not clear whether there is any facility for buses to turn around. There is much more demand for passengers on the A6 corridor rather than the A588 corridor. A re-routed service would become less attractive to passengers to and from University. Has any forecasting of likely demand been undertaken? <p>The ideal way to serve the village would be for buses to divert off the A6, run through the site and then re-join the A6 nearer Lancaster, but this would involve a second crossing of the railway. A less satisfactory solution would be the provision of a turning area within the village itself.</p> <p>The proposed bus services caters only for journeys to and from the University and Lancaster City Centre, the close proximity of new development to the Motorway will make development more attractive to long-distance commuters which would reduce demand for bus services.</p>
TP-013-003	J Davies	Lancaster Bus Users Group	Topic Paper 2	T2.00	<p>Sections 5.5 and 5.7 relates to bus connectivity and the role of the BSIP, however the BSIP is a high level document which sets out aspirations and overall objectives rather than any detailed proposals. Whilst it is correct that the BSIP identifies a University-City-Morecambe-Heysham as a 'Superbus' route, there is no specific proposals to enhance the service along it, which already meets the BSIP definition.</p> <p>Section 5.7 relates to Park & Ride facilities and refers the need to measure demand for such a scheme. The City Council therefore appears to be less certain than the County Council to whether the P&R scheme will go ahead. The fact there is uncertainty in the City Council's mind conflicts with the stated intention of achieving modal shift.</p>
TP-013-004	J Davies	Lancaster Bus Users Group	Topic Paper 2	T2.00	<p>Section 5.10 refers to next steps and makes reference to the need for high quality bus services but it does not define them or say how they would differ from the existing service provision. Paragraph 5.10.4 refers to the role of bus gates, but the Topic Paper does not explain the location of any bus gates or how effective they will be. The best way of achieving prioritisation for buses would be to provide priority at existing bottlenecks of junctions at the Hala Junction and Pointer Roundabout and remove on-road parking along the A6.</p> <p>Section 5.10.5 refers to an emerging car parking strategy, however it is not clear how such a strategy would achieve modal shift through the reduction of spaces or increase in cost. Whilst residents of the garden village would have the option of an improved bus service to compensate them, this would not be available to the resident of the City's residents.</p>
TP-023-004		Lancaster Civic Vision	Topic Paper 2	T2.00	<p>We accept the arguments for need for remodelling of Junction 33 and the provision of a new road. However, we would wish to register the following concerns:</p> <ul style="list-style-type: none">- We are sceptical about the technical feasibility and cost effectiveness of the proposed new railway underpass.- We are strongly of the view that the extent of the bus, cycling and walking improvements are insufficient to achieve the objectives of achieving modal shift.- We are concerned over the current pause in discussions between the City and County Council's relating to transport improvements in Lancaster. We would urge both parties to resolve this situation as a matter of urgency.

SUMMARY OF RESPONSE TO **TOPIC PAPER 2: TRANSPORT AND TRAVEL** - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-002-009	Matthew Symons	Hollins Strategic Land	Topic Paper 2	T2.00	The development of land in the interest of HSL could provide the opportunity for commercially viable bus services to run along Ashton Road.
TP-002-010	Matthew Symons	Hollins Strategic Land	Topic Paper 2	T2.00	HSL would welcome the opportunity to discuss opportunities around the delivery of cycle routes and cycle hubs on land within HSLs interest. This may connect well to any proposed local centre within this location.
TP-002-011	Matthew Symons	Hollins Strategic Land	Topic Paper 2	T2.00	HSL recognise the potenital PROW links within the locality which could provide wider links across the Action Plan area and across towards the Lune Estuary.
Question T2.1: Do you feel the evidential basis towards transport and highways described in this section represents a logical approach to the assessment of implications of proposed development within the ‘Broad Location for Growth’ and establishing the Council’s ambitions around the delivery of modal shift? If not, please explain the rationale to your answer.					
TP-004-014	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.01	<p>Our clients note that the most recent transport data dates back to 2019 and since that time there have been significant changes to travel movements brought about by the COVID Pandemic. As such, whilst the existing evidence base represents a good starting point it is essential that the evidence is updated to recent more current local needs. We would urge the Council to publish evidence on travel and transport as soon as possible to provide certainty over how future travel movements will be managed.</p> <p>Any such evidence should demonstrate the value and attractiveness of modal shift, having regard to the change in circumstances required to make that happen. It should consider how modal shift should integrate with the wider transport network. It is also important to understand how any other transport project(s) will be funded and this should be viability tested.</p>
TP-009-011	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.01	Our clients express a desire to work with Lancaster City Council and transport stakeholders to help to secure the early delivery of housing in this area. Whilst the existing highway network is considered to provide sufficient capacity to release some early delivery of housing, it is recognised that delivery of wider growth will require a significant level of highway infrastructure. Peel L&P agree that whilst the highway work which was undertaken for the Local Plan provides a starting point, it is not sufficient to support the content of this Action Plan and that the evidential basis on this matter needs to be expanded.
TP-016-007	Warren Hilton	National Highways	Topic Paper 2	T2.01	<p>In principle, the evidence base described represents a logical approach to the assessment of implications. However, the previous evidence prepared for the Local Plan is only partial in nature and is out-dated, it also comes from a reactive viewpoint based on previous Goverment direction.</p> <p>We agree that it is fundamental that new transport evidence is brought forward to take account of post-COVID travel behaviour and for this to be used to consider neww infrastructure, sustainable travel measures and modal shift. We also note the specific detail which is needed for this updated travel assessment relating to location, scale and timing of development. This information should be result in varying transport and modelling scenarios. National Highways consider that care should be taken in the production of different strategies for highways and sustainable travel, Different assessment work is needed, however it should not be disjointed and should not tackle different aspects in isolation.</p>
TP-026-001	Patricia Clarke	Dynamo Cycle Campaign, Lancaster	Topic Paper 2	T2.01	No. It is not logical to agre to such a large development without definite plans being put in place before embarking on a major transformation.
TP-029-012	Katrina Barnish	N/A	Topic Paper 2	T2.01	The evidence is not adequate and has been gathered over a short period of time. It is upsetting to be told that traffic in your area is acceptable when you struggle to cross the road. The information gather pays no attention to the constant roadworks. The broad location suggested in South Lancaster is too far away from the City Centre for any type of modal shift in travelling. The result of this plan will be to enforce car dependency.
TP-030-005	Louise Gill	RSPB	Topic Paper 2	T2.01	A modal shift in transport used by all is required to allow us to meet climate change targets. This includes increased use of cycling and walking, increased availability and decreased costs of public transport.
TP-032-001	Tracey McNamara	N/A	Topic Paper 2	T2.01	No. It is not taking into account the wider infrastructure and network of local roads. If this plan goes ahead, the traffic in local communities and villages just increases. Local roads to the South and around Cockerham are already rat-runs which have excessive car and HGV use. This proposal is just going to exacerbate problems and cause more danger on our roads. If they built a bypass between Bailrigg to Glasson Docks to stop HGV movements perhaps this would be an answer.
TP-036-014	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.01	The 2016 Highways and Transport Masterplan is largely conceptual and has insufficient evidence of what is and will be the type and volume of transport needed in South Lancaster. The location of housing and employment must be assessed through the Action Plan to provide the necessary evidence for transport planning.
Question T2.2: Do you feel that the evidence identified in Table 3.1 represents a reasonable and proportional basis for the production of the Lancaster South Area Action Plan? If not what gaps in evidence do you think are missing?					
TP-001-013	Marcus Hudson	Lancashire County Council	Topic Paper 2	T2.02	The Transport Strategy needs to be developed in tandem with the landowner collaboration strategy and strategy for setting and collecting developer contributions in respect of strategic infrastructure. The cross linkages to the implementation plan need to be made clearer.

SUMMARY OF RESPONSE TO **TOPIC PAPER 2: TRANSPORT AND TRAVEL** - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-004-015	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.02	<p>Our clients welcome the level of evidence which has been identified in Table 3.1 and consider this combined to represent a suitable evidence base to prepare the Action Plan. There is a element of concern that a number of the documents listed in this table remain 'ongoing' and it will be important that this evidence base is completed before the Council seek to make any further progression with the Action Plan, evidence should not be used to backfill the Action Plan, rather it should inform it. It is also important that these documents are released to the public as part of a wider consultation exercise so they are subject to proper scrutiny.</p> <p>Additionally, the Action Plan should be accompanied by an appropriate masterplan, phasing plan and development framework. It is noted that the Council are reliant on a masterplan which does not align with the broad location for growth. This is considered to be a flaw in the evidence which supports the development of the AAP. For robustness, it is considered that a masterplan should be developed which is consistent with the Local Plan designation.</p>
TP-009-012	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.02	<p>Our clients consider that the evidence base of documents set out in Table 4.1 is comprehensive. In addition the Council could consider commissioning a Heritage Assessment, Utilities Assessment and Soil / Agricultural Quality Report. It is also clear that further work is required to determine an appropriate methodology for calculating developer contributions. Peel L&P also consider further work is required in terms of understanding how phasing will be achieved across the area. Consideraiton should be given to the phasing of sites and the consequences on viability. It will be important that the evidence provided remains up-to-date.</p>
TP-016-008	Warren Hilton	National Highways	Topic Paper 2	T2.02	<p>National Highways notes the evidence in Table 3.1 and this range of products represents a reasonable and proportionate basis for the production of the Action Plan. However, there is a risk of the production of several isolated documents which may be more specific. The evidence base should support the vision the site wants to acheive. The evidence should identify and assess the infrastructure required to enable people to live sustainably.</p>
TP-029-013	Katrina Barnish	N/A	Topic Paper 2	T2.02	<p>There is no acceptable evidence for this level of growth.</p>
TP-032-002	Tracey McNamara	N/A	Topic Paper 2	T2.02	<p>No. It is not taking the bigger picture into account in terms of road deaths.</p>
TP-036-015	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.02	<p>There appears to be no specific evidence base for a strategy for education and healthcare provision, including the development of Lancaster University, renewable energy generation, improvements to the footpath / bridleway network, a railway strategy and a strategy for securing a skilled workforce.</p>
Question T2.3: Do you agree that the approach to addressing implications on the local highway network provide a clear and logical approach to this critical matter? Do you feel that the Council should be exploring these issues in an alternative way? If so, please explain your answer.					
TP-001-014	Marcus Hudson	Lancashire County Council	Topic Paper 2	T2.03	<p>The work on the 2016 Highways and Transport Masterplan has been updated and refined in connection with the South Lancaster Growth Catalyst. This Topic Paper fails to acknowledge this evolution in the evidence base and strategic direction in transport planning, including the need to future proof strategic transport needs beyond the plan period.</p> <p>In particular there needs to be a shared understanding between the City and County Council around cumulative transport impacts and the way in which strategic infrastructure is funded and delivered. It is important that the Action Plan recognises, as per Policy SG3, piecemeal development is usually inappropriate.</p>
TP-003-003		Bailrigg Village Residents Association	Topic Paper 2	T2.03	<p>We agree that the re-configuration of Junction 33 would relieve congestion at the motorway exist and benefit those driving to the University. We agree that the provision of a by-pass round Galgate would be beneficial to relieve congestion and pollution in Galgate. However, just as critical is the need to relieve pressure further north along the A6, for instance Hala Junction and Pointer Roundabout. It is not clear there is funding for such improvements. Furthermore, the full impact of the COVID pandemic is not known so this could be an alternative starting point for addressing local highway improvements.</p>
TP-004-016	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.03	<p>Our clients agree that the approach to focus on both the strategic and local network is necessary to develop an effective framework for the area. However, they would question how the significant road improvements detailed in the topic paper would align wiht the strategy of improving modal shift. Our clients note that much of these improvements would be funded through developer contributions, in line with nationally prescribed tests. Whilst there is no objection to this approach, it would have to go through the necessary viability testing. It is also important that these documents are released to the public as part of a wider consultation exercise so they are subject to proper scrutiny.</p>
TP-009-013	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.03	<p>Our clients are supportive of addressing the implications on the local highway network and the delivery of the supporting road and transport infrastructure. The Action Plan timescales should be reflective of the delivery of strategic road infrastructure being advanced by the County Council. Peel L&P endorses the proposed further assessment work from both the City and County Councils to consider the implications of the proposed levels of growth on the local highway network and welcome the intention to provide further clarity on the potential developer contributions. It is assumed that a robust evidence base would be provided for these requests. However, Peel L&P feel that the current approach is not clear and the realistic delivery of highway and transport improvements (and their phasing) should be examined in further detail.</p>

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TP-016-009	Warren Hilton	National Highways	Topic Paper 2	T2.03	<p>National Highways would welcome further engagement with the Council in relation to the reconfiguration of Junction 33. It is our recommendation that an area wide model is development and run to undertand the implications of traffic rerouting from the reconfigured junction and associated road infrastructure. We support the City Council's proposal of updating assessment work on the local highway network but suggest caution on terminology. At this early stage we recommend seeking to design-out additional vehicle travel demand, not accept it, and identify additional infrastructure to accommodate the resulting demand. A proactive approach in terms of designing a low carbon development would be supported as opposed to a mitigation led approach.</p> <p>In terms of the approach to highway matters, it is our view that there are existing transport capacity challenges in the Lancaster area which need to be addressed through modal shift and potentially mitigation measures such as Travel Demand Management. This is a different aporoach to which should be taken for the garden village, which is a design-led approach to facilitate a low carbon development from the outset.</p>
TP-024-012	Alban Cassidy	Cassidy & Ashton	Topic Paper 2	T2.03	The emphasis should be to include opportunities for access to additonal development areas afforded by the link road alongside travel alternatives. Consideration should also be given to opening up roadside services that support the link road.
TP-026-002	Patricia Clarke	Dynamo Cycle Campaign, Lancaster	Topic Paper 2	T2.03	You do not have up-to-date information about the number of houses nor are you able to specify what the post COVID-shifts in travel patterns are. Logic is one thing, facts are another.
TP-028-001	Ian Chadwick	N/A	Topic Paper 2	T2.03	I cannot comprehensve why you cannot simply add a new junction to the M6 just south of the University onto Hazelrigg Lane. This would not only be more economical but also stop road and noise pollution being brought further west from the M6.
TP-029-014	Katrina Barnish	N/A	Topic Paper 2	T2.03	Housing should be built in areas with existing transport networks to enable them to be more sustainable and improve.
TP-030-006	Louise Gill	RSPB	Topic Paper 2	T2.03	We believe that the use of cycling and public transport should be at the forefront of these plans especially to remove on-local traffic from the city. Cycling infrastructure needs to be significantly improced to ensure cyclist are safe and away from vehicles. Buses need to be more regular and cheaper for those living just outside the City.
TP-032-003	Tracey McNamara	N/A	Topic Paper 2	T2.03	The Council should be listening to more of the local community, Local MPs and campaigning from the Parish Council.
TP-033-009	Graham Lamb	Pegasus Group on behalf of Highgrove Strategic Land Ltd	Topic Paper 2	T2.03	Significant road infrastructure improvements area need to deliver growth in this area, most notably the delivery of the new motorway junction and spine road. We consider Junction 33 to be a key asset to the Action Plan areas with a valuable opportunity to deliver employment sites with excellent connections to both development and the motorway network. Development of this road infrastructure provides an opportunity for the allocation of employment sites on residual sites neighbouring the link road post completion. The existing evidence fail to properly acknowledge and support this crucial infrastructure and this must be addressed as the Action Plan process moves forward.
TP-036-016	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.03	<p>The impact on local roads from development will need detailed assessment and therefore the assessment described by the Council in 4.4.3 is necessary. This assessmnt must include specifically taking evidence from Parish Councils who have intimate knowledge of the locality.</p> <p>The motorway junction reconfiguration has already been modelled to show how traffic will increase by 60-70% at peak times along Hazelrigg Lane / Blea Tarn Road. This will pose significant challenges in terms of congestion, highway safety and usability for other road users.</p>
TP-035-014	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 2	T2.03	<p>Both the reconfiguraton of the motorway junction and new road are identified as critical elements of infrastructure in the Topic Paper. Policy SG3 of the Local Plan make clear that infrastructure delivery is instigated at an early stage and the Parish Council expect this principle to be upheld.</p> <p>Although we appreciate that the Local Plan evidence prepared by White Young Green (WYG) considers only projected traffic flows, it does highlight the constraints along the A6. Our understanding of this work is that it only considers traffic flows without traffic from the garden village and that further assessment work will need to be undertaken to evaluate this.</p> <p>We do not believe that the underpass of the West Coast Mainline can be achieved in the timescales proposed by Lancashire County Council, let alone the proposed new road through the Action Plan area and that it may exceed the proposed timescales by a number of years. Construction of the new road is therefore likely to commence at the north and that construction traffic will have to use the existing road network, particularly making use of Pointer Roundabout. We trust therefore that improvements to the various junctions on the A6, including Pointer Roundabout and junctions to the south will be completed before significant construction related to the garden village (including the road itself) has begun. Whereas these issues are of general concern to the wider city, the indirect effects, should these issues not be resolved, are likely to be severe to our Parish.</p> <p>This Topic Paper fails to address the impact on the garden village on the A588. We would draw your attention to the various bottlenecks along this road in addition to the Pointer Roundabout, specificaly at the pinchpoint at Royal Albert Cottages and congestion at Riply High School. There are also issues of dangerous bends along the whole length of this road.</p>
Question T2.4: Do you consider that the ambitions of the BSIP provide sufficient scope for connectivity between the ‘Broad Location for Growth’ and Lancaster City Centre? Do you feel that there is a lack of connectivity to any other areas? If so, where?					

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Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-004-017	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.04	Our clients support the visions and ambition of the BSIP and consider that, in general terms, provides sufficient scope between Lancaster City Centre and the 'Broad Location for Growth'. It is not clear whether its considerations consider simply the garden village or the wider designation as a whole. This is not considered to be a robust approach and not consistent with the local plan which should reflect the wider area identified in SG1. It is not considered appropriate for the Action Plan or supporting Transport Strategy to focus solely on the garden village.
TP-009-014	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.04	Our Clients endorse the ambitions of the BSIP and supports increased connectivity.
TP-015-012	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 2	T2.04	As the Bus Rapid Transit is no longer being pursued due to viability issues, it is crucial that sufficient bus service improvements are made between South Lancaster and Lancaster City Centre to ensure that travel to bus is an attractive and realistic alternative to the private car. If this provision is not made this will limit the ability to create modal shift in South Lancaster. The University support the recognition of the need for Superbus routes connecting the corridor between Heysham, Morecambe, Lancaster and the University.
TP-016-010	Warren Hilton	National Highways	Topic Paper 2	T2.04	An enhanced bus service is needed if there is a modal shift from private car usage to other modes. We broadly agree that the ambitions of the BSIP provide sufficient scope for connectivity between South Lancaster and the City Centre. It is noted that work on the City Centre Movement Strategy and Bus Rapid Transit projects were based on the reallocation of road space to support public transport movements. The decision not to pursue roadspace reallocation along the A6 is considered to be disappointing and potentially limits the promotion of active and sustainable travel. The Topic Paper indicates that whilst some funding has been secured for bus improvements this only extends to bus priority measures on Ashton Road and in Bowerham. Without funding to deliver other elements of the BSIP, National Highways have concerns over the level of ambition of schemes and potential bus usage as part of development across the South Lancaster area.
TP-024-013	Alban Cassidy	Cassidy & Ashton	Topic Paper 2	T2.04	Great emphasis should be given to creating viable and sustainable bus links which can run through the development area and link onto the A6. This could be in the form of a multi-modal park and ride facility located adjacent to both the A6 and new link road.
TP-026-003	Patricia Clarke	Dynamo Cycle Campaign, Lancaster	Topic Paper 2	T2.04	More concrete informaiton is needed before such a question can be answered, for example if it is impossible to build a road under a railway line where do you go from there?
TP-029-015	Katrina Barnish	N/A	Topic Paper 2	T2.04	No, without provision of a light railway line or some other new form of transport, South Lancaster will just result in even more congestion, particularly in Central Lancaster.
TP-032-004	Tracey McNamara	N/A	Topic Paper 2	T2.04	A Bailrigg to Glasson Dock bypass is needed.
TP-036-017	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.04	The BSIP represents a dillution of ambitions for sustainable travel movements, for instance the lose of the proposed bus rapid transit system. It is not clear that the BSIP factors in growth in traffic on the A6 and A588 associated with the garden village, innovation campus or Junction 33 improvements. Therefore the BSIP is useful but not comprehensive enough to be relied upon. As regard of missing connectivity, the current application for 680 houses north of Bailrigg Lane suggest that a bus route may be created between Hala Hill and Sir John Fisher Drive.
Question T2.5: Do you have any preferred approach from the approaches described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.					
TP-001-015	Marcus Hudson	Lancashire County Council	Topic Paper 2	T2.05	The priorities to infrastructure funding and delivery should be made clearer having regard to work around the South Lancaster Growth Catalyst.
TP-003-004		Bailrigg Village Residents Association	Topic Paper 2	T2.05	Approach B should include regular and frequent bus links along the A6 consistently throughout the year and not just during term time. There should be improved bus links to the railway station with more space on the bus for bulky luggage.
TP-004-018	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.05	Our clients have no preferred approach in relation to public transport, although support the overarching ambition to promote and improve options for sustainable transport throughout the 'Broad Location for Growth'. It is important that any requirements for funding towards public transport to be provided by developments should meet the appropriate national tests and be viability tested.
TP-009-015	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.05	Our Clients preferred approach to public transport delivery is considered to Approach B. Significant transport infrastructure should be proposed to support wider growth in the Area Action Plan to secure increased connectivity between South Lancaster and Lancaster City Centre. Improvements to the existing network should be undertaken alongside new infrastructure. It should be the case that developer contributions should flow from any resulting policy should be CIL compliant and pass the obligations tests in national planning policy.
TP-015-013	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 2	T2.05	The University's preferred approach is Approach C. Proposals for long-term rail infrastructure to support the University Campus are strongly supported. Therefore potential links should not be ruled out at this stage and should inform part of the investigations into creating modal shift in the Action Plan.
TP-016-011	Warren Hilton	National Highways	Topic Paper 2	T2.05	It is our view that Approach B which will seek to advance proposals which promote the role of public tranport across South Lancaster is suitable. It is however understood that funding to deliver these improvements may be challenged. It is recommended that an area wide integrated network is proposed as the business case to enable the key A6 and A588 corridors to function to their full potential.
TP-024-014	Alban Cassidy	Cassidy & Ashton	Topic Paper 2	T2.05	Approach C is preferred. The proposals set out in Approaches A and B are laudable and supported but given the high quality rail line with the Action Plan area and the land available next to it for a station and park & ride facilities this option should continue to be explored, even if this simply leads to the future safeguarding of land for future delivery.

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TP-026-004	Patricia Clarke	Dynamo Cycle Campaign, Lancaster	Topic Paper 2	T2.05	If the A6 I not to be further clogged by individual cars from the new development it will be necessary to provide disincentives as well as incentives to use buses.
TP-029-016	Katrina Barnish	N/A	Topic Paper 2	T2.05	If development in South Lancaster goes ahead it should be car free surburb with exceptions for those with disabilities. A congestion charge should be implemented in Central Lancaster as soon as possible. This is the only way to start a 'modal shift'.
TP-030-007	Louise Gill	RSPB	Topic Paper 2	T2.05	Approach C is preferred. This has the potential to remove many students and staff from the network before they get to Lancaster. A park and ride for South Lancaster and cycling needs to be a priority.
TP-032-005	Tracey McNamara	N/A	Topic Paper 2	T2.05	A Bypass between Bailrigg and Glasson Dock is needed to alleviate HGVs on country lanes and through local villages.
TP-036-018	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.05	Approach B is more sensible than Approach A because it recognises that traffic along the A6 and A588 corridors is driven more by new development in South Lancaster and benefits which will accrue to residents outside the Action Plan area. Approach C is our favoured approach because it keeps open the option for a railway station at Bailrigg.
Question T2.6: Do you have any preferred approach from the approaches described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.					
TP-004-019	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.06	Our clients have no preferred approach in relation to cycling, although do support the provison of an integrated cycle network throughout the Action Plan area. Our clients remain concerned that the analysis is based around the JTP Masterplan of the garden village and does not reflect the wider area designated in Policy SG1. This is considered to be a flaw and needs to be revisit in order to deliver an effective and sound plan.
TP-009-016	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.06	Our Clients preferred approach is Approach C for ensuring the delivery of cycle infrastructure.
TP-015-014	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 2	T2.06	The University's preferred approach is Approach C. Sustainable transport is key priority for the University as part of its Climate Emergency Carbon Reduction Plan. Approach C will ensure that new development promotes as well as upgrading existing cycle infrastructure, prioritising the key routes between South Lancaster and the City Centre.
TP-016-012	Warren Hilton	National Highways	Topic Paper 2	T2.06	<p>In relation to the proposed cycle superhighway, National Highways would like to understand the funding and delivery mechanism to provide the segregated cycle route between the A6 and Hazelrigg Lane, northwards towards the junction with Ashton Road. Any proposals should be brought forward in the context of Government guidance, particularly document LTN/20.</p> <p>National Highways note that the plans state 'aspirational' cycle routes suggesting there has been no feasibility work undertaken to date. We would seek to understand what the evidence base for the Active Travel Action Plan routes are base on.</p> <p>We support the approach of creating strong connectivity and accessibility across the garden village area but also that this is integrated into a wider upgraded network. Noting all of this, we agree that Approach C would be the most suitable in addressing these matters.</p>
TP-024-015	Alban Cassidy	Cassidy & Ashton	Topic Paper 2	T2.06	A mixture of Approaches C and D are supported and provide the most sustainable alternatives to the car or the potential link into a new park & ride facility along the A6 corridor.Without high quality linkages and the upgrading of the surrounding road network, desirability of such transport will be severely reduced.
TP-026-005	Patricia Clarke	Dynamo Cycle Campaign, Lancaster	Topic Paper 2	T2.06	The plans are so nebulus at present. The Council should not expect the canal towpath to be regular utility route from Lancaster, it is unlit and passes under low bridges.
TP-030-008	Louise Gill	RSPB	Topic Paper 2	T2.06	Approaches C and D are both favourable. The cycle network needs an overview in Lancaster with cycle routes disappearing and reappearing, being covered in debris, pot holes and services. A cycle route segregated from cars from Galgate to the City Centre is required and could be achieved if parked cars were to be removed. There should be barriers to ensure vehicles cannot enter the cycle paths.
TP-036-017	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.06	If one of the ambitions of the Action Plan is to demonstrate modal shift is achievable and not simply a concept then all realistic cycling provisions need to be considered. As such Approach C is preferred over Approach D because no car development is unrealistic and subsidising e-bikes is unaffordable. Approach C not only addresses the need for the garden village but alos the existing barriers to cycling between the City Centre and the University.
TP-035-014	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 2	T2.06	With regard to the BSIP, we are largely a rural parish with no direct access to public transport and are therefore dependent on car use and this is unlikely to change. The transport evidence for the Local Plan does not consider the introduction of bus lanes at the PointerRoundabout. There appears to be little scope for providing additional lane(s) for this purpose. Desirable as bus lanes may be, the Parish Council are concerned that this could restrict traffic and create rat-running through the parish.
Question T2.7: Do you have any preferred approach from the approaches described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.					
TP-003-005		Bailrigg Village Residents Association	Topic Paper 2	T2.07	Provision for motorised scooter and wheelchair users is missing from these approaches. Upgrades of footpaths should be wide enough for walkers alongside wheelchairs and motorised scooters.

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Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-004-020	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.07	Our clients have no preferred approach in relation to walking, although do support the provision of an integrated footpath network throughout the Action Plan area. Our clients remain concerned that the analysis is based around the JTP Masterplan of the garden village and does not reflect the wider area designated in Policy SG1. This is considered to be a flaw and needs to be revisit in order to deliver an effective and sound plan.
TP-006-001	Brian Jones	Ramblers Association	Topic Paper 2	T2.07	While long walk ways are unlikely to be used for commuting or regular shopping, they still make a valuable contributon in being easy to follow. We wish to see as much separation as possible between cyclists and walkers. Major dual-purpose routes should be designated in such a way that the are readily included in standard OS base maps. There should be good separation between walking routes and motorised traffic. We suggest appropriate physical barriers and 'rumble strips' be incorporated to segregate differing modes of travel. More consideration should be given to walking links into the countryside.
TP-009-017	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.07	Our Clients preferred approach is Approach B as the most appropriate way of encouraging walking in South Lancaster.
TP-015-015	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 2	T2.07	The University's preferred approach is Approach C. Sustainable transport is a key priority to the Univeristy and therefore supports the prioritisation of walking infrastructure in new developments, alongside upgrading existing routes.
TP-016-013	Warren Hilton	National Highways	Topic Paper 2	T2.07	We agree with Approach C for walking provision in South Lancaster. It will be important for the new development to deliver permeable walking routes for direct and active travel on foot. We agree with the proposed approach of a 10-minute neighbourhood which allos strong connectivity and accessibily across the area. The surrounding routes into Lancaster City Centre and the University Campus are essential in requiring integraton with the new development. The emerging Sustainable Travel Strategy should take account of the latest walking infrastructure guidance LTN/20 and the updated polocy circular 01/2022.
TP-024-016	Alban Cassidy	Cassidy & Ashton	Topic Paper 2	T2.07	Ideally Approach D should be adopted to limit car use but also make the provision of a park & ride facility more desirable to the wider area and more viable due to demand.
TP-030-009	Louise Gill	RSPB	Topic Paper 2	T2.07	Approaches C or D are both favourable. The footpaths need upgrading outside the Action Plan area to provide connection to the City Centre and University. No car development sounds wonderful in principle but there is concern it may lead to cars being elsewhere.
TP-036-018	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.07	Approach B is the minimum necessary to make walking in the garden village attractive and the first choice of residents. However, wider benefits should be sought by addressing wider connectivity within the existing network and therefore Approach C is preferred. The extra features of Approach D are considered unrealistic and unaffordable. In supporting Approach C, the Parish Council would like to ensure that rural walking routes to the east of the M6 are considered. Securing routes in this area would ultimately allow the River Lune to be connected up to the Forest of Bowland which would be considered a valuable additiion to the local network.
TP-035-015	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 2	T2.07	Figure 6.2 suggests a cycleway along the A588, bounding the western side of the garden village. We would be interested as to how this will be integrated into the A588 as this is already a dangerous route for all road users. Figure 6.3 suggests a cycle 'superhighway' through Stodday, presumably from the Lune Estuary path. The lane from Stodday to the A588 is narrow for both cars and cycles so it would be unwise to encourage cyclists to use this route.
Question T2.8: Do you agree that the Council should consider the role of bespoke vehicle parking standards for new development which comes forward within the 'Broad Location for Growth'? If not, please explain your rationale for your opinion.					
TP-004-021	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.08	Our client does not consider that the Council should pursue bespoke parking standards within the 'Broad Location for Growth'. It is considered that the standards should be consistent with the wider authority area and should not be different for different neighbourhoods. That said, consideration could be given to how vehicle parking is accommodated within the design of new development, for example the provision of cycle streets, which prioritise cyclists whilst acknowledging that residents will likely to be reliant on private vehicles to some extent.
TP-009-018	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.08	Our Clients endorse the role of bespoke vehicle parking standards for new development within the Action Plan area. It is likely that future delivery of housing in this area is to be at different standards (multit-modally) and so bespoke standards should be considered and implemented on a flexible site-by-site basis.
TP-029-017	Katrina Barnish	N/A	Topic Paper 2	T2.08	There should be no parking. The A6 simply does not have the capacity to take more cars without increasing the misery of existing residents and the asociated pollution which is known to have impacts on health.
TP-030-010	Louise Gill	RSPB	Topic Paper 2	T2.08	Yes. The removal of cars off roud onto drives is safer for all pedestrians and cyclists.
TP-032-006	Tracey McNamara	N/A	Topic Paper 2	T2.08	Why bespoke?
TP-036-019	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.08	It is unrealistic to ban cars but with the right attractive alternatives to car usage it is not unreasonable to limit car parking. However, the key issue is how to accommodate visitor parking and innovative bespoke solutions will be needed.
Question T2.9: Do you have any preferred approach from the approaches described? Please give rationale for your answer. Do you have any views on the potential approaches towards vehicle parking described in this paper? Do you feel that any potential approaches to vehicle parking have been missed?					

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TP-003-006		Bailrigg Village Residents Association	Topic Paper 2	T2.09	We concur with comments in paragraph 8.5.3 regarding the importance of balancing ambitions for low carbon travel with the realities of the specific needs of individuals. We consider that Approach B is the better fit with these sentiments.
TP-004-022	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.09	Whilst parking standards should be retained to provide consistency within the Local Plan, there is no reason why alternative solutions to how parking can be incorporated into development should not be considered. However, these solutions would be need to be subject of public scrutiny and input from stakeholders. Whilst it may be possible for some options for car free development (in city centre locations or close to the university) this is not considered to be an appropriate approach within the 'Broad Location for Growth'. Further consideration could be given to improving infrastructure for electric vehicles.
TP-009-019	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.09	Our Clients preferred approach is Approach C in terms of addressing adequate parking within the Action Plan area. However, it is important that adequate parking facilities are provided to reduce the potential for localised parking problems being created. Peel L&P strongly support modal shift as a general principle and endorses the inclusion of an active travel network. Re-investigating vehicle parking and implementing a bespoke, flexible model should be a priority of the Council to ensure that modal shift is supported and hopefully achieved in the wider context of the Climate Emergency. There is a reality that people and business will still need to use private vehicles to move around locally, rendering Approach D inappropriate.
TP-016-014	Warren Hilton	National Highways	Topic Paper 2	T2.09	It is our view that Approach C does present a good approach to reducing vehicle parking within the Action Plan area. However, as this development is not yet built there is the opportunity to design for allow carbon, low demand development from the outset - in which case we would also support Approach D. Care is suggested in relating the use of promoting modal shift as an aspiration as this should be only required for excess trips which need to be taken and which cannot be made by foot or by bike.
TP-029-018	Katrina Barnish	N/A	Topic Paper 2	T2.09	Car parking should only be provided for people with disabilities or for car share schemes.
TP-030-011	Louise Gill	RSPB	Topic Paper 2	T2.09	It is good to reduce cars and increase public transport but also consider those who are unable to use these forms of transport. Perhaps reducing the number of cars allowed per household depending on size / requiring electric cars is a possibility.
TP-036-020	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.09	It is unrealistic to ban cars (Approach D) but with the right attractive alternatives to car usage it is not unreasonable to limit car parking. Approach C promotes the modal shift of residents away from cars but the key issue is how to accommodate visitors parking.
Question T2.10: Do you agree with the definition presented on modal shift? How do you think that the definition can be refined further to be pertinent to South Lancaster? Please provide rationale for your answer.					
TP-004-023	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.10	<p>Our client is content with the proposed definition for modal shift for the purposes of the AAP. However, they would suggest a minor change to the definiton in order to steer away from the use of fossil powered private vehicles (as opposed to a shift away from private vehicles all together). [alternative wording is provided within the responders full response]</p> <p>Whilst our clients support the definition provided, it is considered to be somewhat unrealistic given the geographical location of the Action Plan area and Lancaster generally to anticipate a total shift away from private vehicles. Rather, the consider that support should be given to the promotion of electric vehicles as well as supporting an integrated sustainable transport and footpath network. Notwithstanding this, caution is urged around the sole advocacy of electric vehicles, noting that the market is young and remains untested. In addition, the Council should be mindful of the extensive infrastructure required to make the widespread use of electric vehicles a reality.</p>
TP-009-020	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.10	Our Clients endorses the definition of modal shift and fully supports the transition to more sustainable forms of travel and resonates with the Council's Climate Emergency.
TP-016-015	Warren Hilton	National Highways	Topic Paper 2	T2.10	We broadly agree with the definition presented of modal shift. However, we recommend further consideration is given to the DfT Transport Decarbonisation Hierarchy. This guidance places avoiding travel or reducing the need to travel ahead of active travel, mass transit or electric vehicles.
TP-026-006	Patricia Clarke	Dynamo Cycle Campaign, Lancaster	Topic Paper 2	T2.10	The definiton seems fine but it will be difficult to realise and implement.
TP-029-019	Katrina Barnish	N/A	Topic Paper 2	T2.10	There has been no effort or strategy put into alleviate traffic issues in Lancaster. Therefore there is no evidence what so ever, that the Council is serious about 'modal shift'. This is purely a strategy to alleviate residents worries, modal shift should start now.
TP-036-021	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.10	The definition is lacking. Modal shift will only occur when individuals find the benefits of not using private vehicles exceed that of using one. 'Promoting and giving primacy to alternative transport' will not work if using a car is more comfortable, convenient and cost effective. An alternative definition for modal shift is provided within the responders full response.
Question T2.11: Do you feel that the elements of modal shift described provide the correct spectrum of incentives and disincentives to be explored through the Action Plan process? Do you feel there are any further elements which should be explored? Do you feel that any elements should be discounted from the process? Please explain your answer.					
TP-004-024	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.11	Our clients are supportive of the modal shift measures described in paragraph 9.2.3 of the topic paper but consider a great emphasis should be placed on the use of electric vehicles, although these cannot be relied on in isolation at this stage. It is important that any measures are backed up by appropriate evidence and, where they are reliant on developer contributions, supported by the necessary infrastructure testing.

SUMMARY OF RESPONSE TO **TOPIC PAPER 2: TRANSPORT AND TRAVEL** - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-009-021	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.11	Our Clients support all those elements of modal shift set out in the Topic Paper and is fully supportive of an overall shift towards sustainable travel measures.
TP-016-016	Warren Hilton	National Highways	Topic Paper 2	T2.11	<p>A number of the initiatives stated appear to be unviable or currently undefined, for example bus rapid transit, new cycle routes and re-allocated road space. As such it is recommended that a broad range of incentives and disincentives are explored through the Action Plan and this is accompanied by delivery and funding mechanisms. Initiatives considered should include policy levers, behaviour change, marketing and training.</p> <p>As part of the Action Plan process the Council should investigate the propensity for change in terms of the possible uptake in cycling and walking. This is required as background evidence to inform the proposed measures and modal shift changes. This will provide further evidence on the expected level of impact of travel demand on the highway network.</p>
TP-024-017	Alban Cassidy	Cassidy & Ashton	Topic Paper 2	T2.11	There should be a greater emphasis on developing a park & ride facility in a location which is accessible from the A6 and the new link road but also adjacent to the railway line in order to create the opportunity for the future provision of a railway station.
TP-036-022	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.11	The list is reasonable. The list of elements does not include disincentivising car usage in the city centre presumably because there are alternative transport options offered to residents of the garden vilage which are not universally available to other Lancaster citizens.
Question T2.12: Do you agree that the Council should investigate the opportunities for modal shift in preparing the Area Action Plan? If not, please explain the rationale to your opinion.					
TP-002-012	Matthew Symons	Hollins Strategic Land	Topic Paper 2	T2.12	HSL would support the investigation of opportunities for modal shift. The garden village has the potential to be a sustainable community that is not overly reliant upon private forms of transport. More detailed design is required to achieve modal shift should be considered at a reserved matters stage across the garden village.
TP-004-025	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.12	Our clients consider that the Council is right to investigate opportunities for modal shift in preparing the Action Plan, indeed the development of such a plan provides a unique opportunity to shape future development in order for it to act as a catalyst for sustainable development. It is important that any such measures are backed up with appropriate evidence and, where there is a reliance of developer contributions, these are accounted for as part of the viability testing. Whilst there is a desire for modal shift, this should not come at a cost which makes development unviable and prevents otherwise sustainable development coming forward.
TP-009-022	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.12	Our Clients recognise the need to achieve modal shift through new development and is supportive of the Council investigating opportunties to achieve this. Opportunities should be identified that are able to feed into scheme design and viability at an early stage.
TP-015-016	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 2	T2.12	The University's preferred approach is Approach C. The University supports the principle of modal shift to encourage the use of public transport, cycling and walking routes.
TP-016-017	Warren Hilton	National Highways	Topic Paper 2	T2.12	We agree that the Council should investigate opportunities for modal shift in preparing the Action Plan. We support the proposed Approach C for ambitious levels of modal shift given the development is not yet fully planned out. However, as stated it appears reactionary to start from a position of modal shift - the development should be designed to enable and promote low carbon living. Modal shift targets should be made for the first and subsequent occupation of the site through a Travel Plan.
TP-026-007	Patricia Clarke	Dynamo Cycle Campaign, Lancaster	Topic Paper 2	T2.12	It would be good if it was also committed to be implemented.
TP-029-020	Katrina Barnish	N/A	Topic Paper 2	T2.12	Yes
TP-036-023	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.12	The Action Plan is a key opportunity for Lancaster to demonstrate modal shift can achieve and contribute towards addressing the Climate Emergency. It will be relatively easy to set a overall target for the Action PIn but quite difficult to calculate the impat that any one initiative may have in comparison to others. Nevertheless, the Parish Council support Approach C.
Question T2.13: Do you agree that this provides the appropriate starting point in investigating issues of modal shift? If not, which approach do you think would be preferable? Do the approaches presented represent all available approaches to the Council in relation to this matter?					
TP-004-026	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 2	T2.13	Our clients welcome the approach set out in paragraphs 9.5.4 and 9.5.5 of the topic paper and welcome that developers will be involved in the process and will have a say in the development strategy moving forward. It is right that the plan seeks to be amitious however it also must be realistic.
TP-009-023	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 2	T2.13	Our Clients preferred approach is Approach C as the most appropriate and realistic way to setting modal shift targets in the Action Plan. Given the context of the Council's Climate Emergency Declaration and principle of Modal Shift within the Action Plan. Peel L&P endorses the integration of opportunities for improvement through infrastructure provision and innovative place-making.
TP-016-018	Warren Hilton	National Highways	Topic Paper 2	T2.13	National Highways recommends that a city wide / area wide approach is taken to creating modal shift to help address the Climate Emergency, this may include initiatives such as Travel Demand Management and Traffic Management. As new development in the area, starting wiht a relatively low trip basis development should seek to achieve low carbon, low travel demand from the outset.
TP-024-018	Alban Cassidy	Cassidy & Ashton	Topic Paper 2	T2.13	Approach C is supported to make the development as ambitious as it can be.
TP-026-008	Patricia Clarke	Dynamo Cycle Campaign, Lancaster	Topic Paper 2	T2.13	It sounds ambitious but there are so many caveats that its easy to see that nothing will change.
TP-036-023	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.13	The Parish Council support Approach C.
Question T2.14: Are there any other points you wish to raise which have not been captured in responses to other questions in this Topic Paper?					
TP-001-016	Marcus Hudson	Lancashire County Council	Topic Paper 2	T2.14	This Topic Paper fails fundamentally to address issues around the funding and delivery of strategic transport infrastructure. The County Council refer to the City Council's role in the South Lancaster Growth Catalyst.

SUMMARY OF RESPONSE TO **TOPIC PAPER 2: TRANSPORT AND TRAVEL** - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-003-007		Bailrigg Village Residents Association	Topic Paper 2	T2.14	If the Council is genuine in delivering a diverse mix of housing for a diverse mix of the population then the transport, travel and modal shift should reflect this, bearing in mind that an individual's needs can vary over time regardless of age. In terms of rail, it is disappointing that other locations for a possible site of a railway station have more been mentioned.
TP-029-021	Katrina Barnish	N/A	Topic Paper 2	T2.14	The papers state that less traffic will be generated in South Lancaster due to the fact that more people will work from home. This is a very flawed argument from the point of view that surely this means that the change to the motorway junction would also not be needed.
TP-032-007	Tracey McNamara	N/A	Topic Paper 2	T2.14	Infrastructure of all new homes on drainage, flooding, farmland and countryside animals, pollution, increased traffic. Safety of walkers should be considered.
TP-036-024	Paul Holland	Scotforth Parish Council	Topic Paper 2	T2.14	The Action Plan should also address the following points: - Speed limits within both new development and existing roads to improve safety. - Build in resilience to the local road network in case the underpass of the railway line floods. - Community taxis for citizens with mobility issues who do not wish to drive.

SUMMARY OF RESPONSE TO TOPIC PAPER 3: ADDRESSING THE CLIMATE EMERGENCY - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
GENERAL COMMENTS TO TOPIC PAPER 3					
TP-008-011	Peter Dutton	Gladman Developments	Topic Paper 3	T3.00	<p>With regard to addressing Climate Change, Gladman believe that it would be logical for the Council to follow the direction of the ultimately adopted Local Plan and the evolving requirements of the building regulations and the Government's roadmap for delivering zero carbon development.</p> <p>In relation to matters of design and construction, Gladman would advocate an approach which sought to incorporate sustainable design and construction measures into proposals where it is possible or feasible to do so rather than being overly prescriptive or include requirements which go beyond accepted industry practice or emerging Government policy. The opportunities for delivering on sustainable design will vary from site-to-site and therefore flexibility should be provided.</p> <p>With net zero energy and distribution, it is not clear how the suggestion that support would not be offered to fossil fuel powered stationary energy as part of Action Plan is compatible to the Government's net zero road map. The same applies to the intention to follow a Local Area Planning Approach. Whilst Gladman believe this is a tool which could be used to explore opportunities, this should provide flexibility on any potential implementation expectations.</p>
TP-010-003	Tim Bettany Simmons	Canal & Rivers Trust	Topic Paper 3	T3.00	Section 5.8 makes reference to heating and cooling networks which is most relevant to the Trust and we note paragraph 5.8.2 which specifically mentions the canal. There could be an opportunity for using the canal for heating / cooling purposes adjacent to development. This would be subject to the separate consent of the Trust and following a full review and assessment. In terms of Question T.18 we do not have a strong preference, however Approach C would appear to be the most appropriate.
TP-012-002	Joanne Harding	Home Builders Federation (HBF)	Topic Paper 3	T3.00	Whilst the ambitious and aspiration aim to achieve net zero is lauded, the HBF is concerned that the Council is adding complexity of policy, regulations and standards that housebuilders are already expected to comply with. The key to success is standardisation and the avoidance of individual Council's specifying their own policy approach, which undermines economies of scale.
TP-015-017	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 3	T3.00	The University is supportive of establishing energy efficiency measures in construction and ensuring resilience to climate change in new buildings. However, it is difficult at this stage to identify a preferred approach from the range of option detailed in the Topic Paper without having more detailed evidence of the impacts of each approach and its implications on viability. The University supports the Council's exploration of these approaches.
Question T3.1: Do you consider that the evidence base identified in Table 4.2.1 represents a reasonable and proportional basis for the production of the Lancaster South Area Action Plan? If not, what gaps in evidence do you think are missing?					
TP-004-027	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.01	<p>Our clients welcome the level of evidence which has been identified in Table 3.1 and consider this combined to represent a suitable evidence base to prepare the Action Plan. There is a element of concern that a number of the documents listed in this table remain 'ongoing' and it will be important that this evidence base is completed before the Council seek to make any further progression with the Action Plan, evidence should not be used to backfill the Action Plan, rather it should inform it. It is also important that these documents are released to the public as part of a wider consultation exercise so they are subject to proper scrutiny.</p> <p>Additionally, the Action Plan should be accompanied by an appropriate masterplan, phasing plan and development framework. It is noted that the Council are reliant on a masterplan which does not align with the broad location for growth. This is considered to be a flaw in the evidence which supports the development of the AAP. For robustness, it is considered that a masterplan should be developed which is consistent with the Local Plan designation.</p>
TP-009-024	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.01	Our clients consider that the evidence base of documents set out in Table 4.1 is comprehensive. In addition the Council could consider commissioning a Heritage Assessment, Utilities Assessment and Soil / Agricultural Quality Report. It is also clear that further work is required to determine an appropriate methodology for calculating developer contributions. Peel L&P also consider further work is required in terms of understanding how phasing will be achieved across the area. Consideration should be given to the phasing of sites and the consequences on viability. It will be important that the evidence provided remains up-to-date.
TP-018-001	Kim Wisdom	Lancashire Wildlife Trust	Topic Paper 3	T3.01	The evidence presented seems reasonable and proportionate.
TP-027-001	Helen Sara Taylor	N/A	Topic Paper 3	T3.01	Unfortunately damage to green spaces from intensive agriculture and development over recent years means that commissioning surveys at the current time falls foul of the shifting base lines for biodiversity. We need to look at historical data for biodiversity to understand what has been lost at least within living memory and set targets for improving biodiversity accordingly. Any greenfield site has the potential for biodiversity and addressing the climate change more than a developed site, it the potential for improving carbon capture and biodiversity that we need to assess.
TP-036-025	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.01	There appears to be no specific evidence base for a strategy for education and healthcare provision, including the development of Lancaster University, renewable energy generation, improvements to the footpath / bridleway network, a railway strategy and a strategy for securing a skilled workforce.
Question T3.2: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.					
TP-004-028	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.02	Our clients are supportive of the Council's climate ambitions and recognise the need to adapt to Climate Change and respond to the Council's Climate Emergency Declaration. Notwithstanding this, energy standards are derived from national building regulations and as as a result it is not necessary for these to be repeated in the Action Plan. This being the case, our client supports Approach A to be the correct route for the Action Plan to take as this will ensure that the Action Plan does not set out higher energy standards than those prescribed by Building Regulations. This is not to say that the Council should not seek to promote higher standards (through incentives or other means) but that some not form part of planning policy.
TP-009-025	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.02	Our Clients preferred approach is Approach B in this instance subject to a robust viability assessment at the planning application stage. Approaches C, D and E (if implemented) would require an increasingly robust viability considerations to be made to provide flexibility to relax policy requirements where it could be demonstrated that the requirements would render development unviable.
TP-027-002	Helen Sara Taylor	N/A	Topic Paper 3	T3.02	Approach E is preferred.
TP-030-012	Louise Gill	RSPB	Topic Paper 3	T3.02	Approach E is preferable. We are in a Climate Crisis and our energy consumption and creation is a big problem. All new housing should be built to the best available standards available and not just a minimum to ensure they are future proofed and sustainable.
TP-036-026	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.02	The Action Plan is likely to cover a longer timeframe than the Local Plan and therefore should be more ambitious in the context of the Climate Emergency and that which is set out via Approach B. Settin targets will focus the minds of developers and take the opportunity to incorporate renewable energy and energy storage as core features of new development. Therefore the Parish Council support Approach D. Approach E is not supported because there is no information on what unregulated energy is.
Question T3.3: Do you agree that specific energy targets and energy adaptation measures should be set? If not, what other mechanisms do you suggest to ensure that developments are decarbonised and reach net zero in line with the 6th Carbon Budget, Lancaster's Climate Emergency Declaration, and the Paris Agreement as well as reduce energy costs for residents?					
TP-009-026	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.03	The use of renewable and low carbon energy in new development is supported by Peel L&P and will be required as part of the interim Future Homes Standard in 2022. However, there is an implication here in the desire for development to aim to deliver 100% of the operational energy by renewables. Even assuming this on a net basis, it is unlikely to be feasible on most development and may not be commercially viable. Peel L&P believe that the solutions for different sites should be considered flexibly on a case-by-case basis as demands will be different. It is crucial that this process is also subject to viability.
TP-027-003	Helen Sara Taylor	N/A	Topic Paper 3	T3.03	Yes, specific entry targets and energy adaption should be set as a minimum and be exceed where possible.
TP-030-013	Louise Gill	RSPB	Topic Paper 3	T3.03	The targets must be necessity to meet and should be checked upon completion otherwise they won't be met.
TP-036-027	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.03	Energy targets should be set to focus the minds of developers and eliminate ambiguity about what is required to achieve net zero. Consideration should be given to setting negative targets so that new development contribute to offsetting the carbon impacts of existing housing in the district.
Question T3.4: If you feel that specific targets should be set, do you consider that the suggested energy targets and adaptation mechanisms listed above are sufficient? Are there other energy targets that should also be explored?					
TP-009-027	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.04	While the targets identified are deemed generally appropriate to Peel L&P this should be caveated that their implementation and adherence must be subject to robust viability assessment on a site-by-site basis. Peel L&P believe that the energy standards in the Partial Review should be reviewed once the full Future Homes Standards metrics are known to ensure the key point of paragraph 4.3.6 is safeguarded.
TP-030-014	Louise Gill	RSPB	Topic Paper 3	T3.04	It is important that all houses built are carbon neutral and are producing their own energy for sustainability and with the increase in electric car use.
TP-036-028	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.04	Consideration should be given to setting negative targets so that new development contribute to offsetting the carbon impacts of existing housing in the district.
Question T3.5: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.					
TP-004-029	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.05	Our clients do not have a preferred approach to climate focussed design in new buildings. Notwithstanding this, they consider the Action Plan should be consistent with the Local Plan. Whilst specific areas of the Action Plan might look to pursue alternative approaches this should not be a requirement of the Action Plan as a whole.
TP-009-028	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.05	Our Clients preferred approach is Approach A in terms of delivering climate focussed design. Approaches B and C (if implemented) would require the inclusion of a robust viability clause to provide flexibility to relax policy requirements where it can be demonstrated at the planing application stage that the requirements would render development unviable.
TP-012-003	Joanne Harding	Home Builders Federation (HBF)	Topic Paper 3	T3.05	The HBF does not consider that Approach C would be the appropriate starting point for exploring climate focused design policies. It would not be appropriate for residential development to meet locally derived standards that are significantly over and above those applied by national design standards in relation to climate focused design. However, the HBF does consider that it could be appropriate to provide support for these developments where developers are able to provide best practice or if homebuilders wish to use new or innovative technologies.
TP-015-018	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 3	T3.05	The University's view of carbon off-setting, as a principle, is that this should be viewed as a last resort in construction and that carbon generation should be avoided whenever possible in new developments, as a priority.
TP-024-019	Alban Cassidy	Cassidy & Ashton	Topic Paper 3	T3.05	Approach C should be supported. Developers should be encouraged to be ambitious and support should be given to development that is carbon neutral or of similar benefit.
TP-027-004	Helen Sara Taylor	N/A	Topic Paper 3	T3.05	Approach C is preferred. Housing developers currently operating across the North West have no intention of delivering climate-focussed design. I would argue that the requirement for construction to mee these long-term, strategic goals must be paramount.
TP-030-015	Louise Gill	RSPB	Topic Paper 3	T3.05	<p>Approach C is preferred. The broader area need to be planned in detail to ensure that climate change is accounted for in the sense of biodiversity, energy efficiency, flooding and ensuring the design is thought out thoroughly to provide the services and road that will be required. There are significant issues relating to roads in South Lancaster which needs to be tackled by providing better sustainable transport links.</p> <p>There are a range of planning permissions which are being submitted across the South Lancaster area which will increase the flooding to current residents. There are other more suitable locations for development which Approach C will allow for being determined. Approaches A and B do not allow for greater thought into how wildlife and the wider ecosystem can survive. We need to ensure that all builds are undertaken as nature friendly as possible.</p>

SUMMARY OF RESPONSE TO **TOPIC PAPER 3: ADDRESSING THE CLIMATE EMERGENCY** - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-036-029	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.05	Only Approach C has ambition and commitment to the Action Plan making a step change in terms of building design. However, the Parish Council do not support the sentiment in para 4.6.1 which suggests differing design codes may be applied outside of the garden village, our position is that there should be a single high standard across all development.
Question T3.6: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.					
TP-004-030	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.06	Our client is broadly supportive of the principles associated with carbon offsetting but would be cautious in relation to carbon offsetting funds without having the opportunity to review further details of this fund in order to understand the implications on viability. It is not clear at this stage the rate which would be expected, how this would be calculated or the projects it would relate to. These details would need to be factored into viability testing to ensure that development is not rendered unviable. Subject to the publication of information described, Approach B would be broadly supported where offsetting would be included in meeting net zero but would be secured through renewable energy and land sequestration projects.
TP-009-030	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.06	Our Clients preferred approach would be Approach C. Peel L&P support the Council's desire to offset carbon through new development and feel the use of an acceptable local carbon offsetting fund may provide the Council with greater flexibility and ability to achieve this aim. It should be noted however that carbon offsetting should only be introduced where it is financially viable to do so and not at risk of compromising sustainable development coming forward.
TP-024-020	Alban Cassidy	Cassidy & Ashton	Topic Paper 3	T3.06	Approach B is supported. Offsetting is acceptable but should take place within the defined area of the Action Plan to ensure it is closely linked to the developed area.
TP-030-016	Louise Gill	RSPB	Topic Paper 3	T3.06	Carbon offsetting needs to be provided locally in the area that is being built on.
TP-036-030	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.06	Whilst the Parish Council support the principle of renewable energy projects and landscape sequestration, we only do so to the extent that they contribute to offsetting to other parts of the district. The Action Plan should ensure that the net zero target for South Lancaster is achieved without recourse to carbon offsetting and therefore Approach A is endorsed.
Question T3.7: Do you feel that contributions to a local carbon offset fund represent a reasonable way to account for residual emissions from development? If not, how do you suggest residual carbon emissions be accounted for and offset over the development lifetime?					
TP-009-031	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.07	Our Clients generally supports the Councils use of a carbon offset fund, subject to the Council exploring the approach further to achieve reasoned tariffs. The use of such a system must be based on a robust calculation method and any requested payments justified and appropriately used within the community. An alternative and potentially lower cost approach to addressing residual emissions without carbon offsetting would be for the development and/or residents to secure 100% renewable energy supplies. The importance and beneficial role of the fabric first approach to new buildings should not be overlooked.
TP-018-002	Kim Wisdom	Lancashire Wildlife Trust	Topic Paper 3	T3.07	Approach C seems the most logical. With regard to paragraph 4.9.2 you may find it of assistance to talk with the Trust's Peatland Team regarding Winmarleigh Moss and the Carbon Farm as well as future plans for upland / lowland peat restoration. Also consider the content of the Trust's 'Position Statement on Climate Action' (Supplied as part the response).
TP-027-005	Helen Sara Taylor	N/A	Topic Paper 3	T3.07	Not supportive of carbon offsetting because of scepticism about human nature in general and feel that organisations can be used as an excuse for business as usual.
TP-030-017	Louise Gill	RSPB	Topic Paper 3	T3.07	The amount of carbon that will be needed to be offset locally and should be ensured by visits that it has taken place.
TP-036-031	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.07	The Parish Council do not support a local carbon offsetting fund because (a) it implicitly allows development in the district not to be net zero which is a poor message and (b) such a fund would require administration which is not an effective use of Council resources.
Question T3.8: Do you have any preferred approach from the those described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.					
TP-004-031	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.08	Our client notes the Council's ambitions around taking account of embodied carbon within development but is concerned that the Council is considering an approach that would represent a significant deviation from the wider district under the Local Plan. Whilst embodied targets could be supported, this should be reflective of the entire district, not specific areas. It is also unclear how this ambition has been factored into the Council's viability testing. Our clients remain concerned around the reliance that the Council appears to place on the JTP Masterplan and how this appears to be the benchmark for the rest of the Action Plan area. This approach appears to be back-to-front and, in the interests of soundness, it is considered that the strategy should be applied to the area as a whole, not just the garden village.
TP-009-032	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.08	Our Clients endorse Approach C as the most appropriate direction for implementing embodied carbon through new development. Targets should be suggested and encouraged, but setting them as a prerogative as per Approach D could be damaging to development potential and create unviable schemes. Peel L&P believe these targets should remain as guidance only.
TP-012-004	Joanne Harding	Home Builders Federation (HBF)	Topic Paper 3	T3.08	The HBF considers that if the Council were to introduce a policy around embodied carbon and whole life-cycles it will have to closely consider how it will be monitored and what the implications are for the preparation of any assessment, particularly in relation to how easily accessible the data is, and will have to take into consideration that much of the responsibility for emissions will lie in areas outside of the control of the development industry. The Council will also have to consider how this approach could interact with other policies, for example energy efficiency or resilience to heat as well as overall development viability.
TP-018-003	Kim Wisdom	Lancashire Wildlife Trust	Topic Paper 3	T3.08	In terms of design codes, the Trust recommend the use of the 'Building with Nature Standards Framework 2.0'.
TP-024-021	Alban Cassidy	Cassidy & Ashton	Topic Paper 3	T3.08	The approach taken should be as ambitious as possible but if Approach D is not followed, proposals that meet such aspirations should be supported even when they do not directly accord with the finalised Action Plan.
TP-027-006	Helen Sara Taylor	N/A	Topic Paper 3	T3.08	Approach D is preferred.
TP-030-018	Louise Gill	RSPB	Topic Paper 3	T3.08	Approach D is preferred. To create a truly carbon neutral development, embodied carbon needs to be included to meet the Council's Climate Emergency targets.
TP-036-032	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.08	Approach C is the closest to the Parish Council's position because it says design codes will be brought forward, whereas Approaches B and D merely refer to codes being encouraged.
Question T3.9: Do you feel that the above approach to supporting the reduction in embodied carbon is the best one? If not, please provide a rational for your answer. How do you suggest reductions in embodied carbon should be supported?					
TP-036-033	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.09	Given the question refers to a singular approach and yet the table in 4.12.4 includes 4 approaches, it is impossible to say which is the best one.
Question T3.10: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.					
TP-015-019	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 3	T3.10	The University does not agree with the narrow focus on BREEAM as a means of measuring / assessing sustainable buildings. As such, focus on BREEAM and exclude recognition of the range of measures / assessments of sustainability is considered too restrictive. The University would favour an approach which prioritises and promotes low or zero carbon construction, rather than focusing on BREEAM ratings.
TP-024-022	Alban Cassidy	Cassidy & Ashton	Topic Paper 3	T3.10	The approach taken should be as ambitious as possible but if Approach D is not followed, proposals that meet such aspirations should be supported even when they do not directly accord with the finalised Action Plan.
TP-027-007	Helen Sara Taylor	N/A	Topic Paper 3	T3.10	Approach D is preferred, para 4.17.2 points out BREEAM does not deliver net zero buildings.
TP-030-019	Louise Gill	RSPB	Topic Paper 3	T3.10	Approach D is preferred. If we are a species want to be around in the future then we need to put Climate first.
TP-036-034	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.10	It is important that non-residential development achieves net zero just as much as residential development does. The Parish Council therefore supports as a minimum Approach C.
Question T3.11: Do you agree that non-residential development should go beyond BREEAM Excellent within the AAP area? If so, are there other standards or targets which should be considered? If not, what is your rationale? Do you have other suggestions of how to bring commercial development in line with net zero?					
TP-018-004	Kim Wisdom	Lancashire Wildlife Trust	Topic Paper 3	T3.11	The Trust recommend the use of the 'Building with Nature Standards Framework 2.0'.
TP-027-008	Helen Sara Taylor	N/A	Topic Paper 3	T3.11	Yes, non-residential development should go beyond BREEAM.
TP-030-020	Louise Gill	RSPB	Topic Paper 3	T3.11	All residential and non-residential development should meet the most environmental / climate friendly targets.
TP-036-035	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.11	The Parish Council agrees that non-residential development should go beyond the BREEAM Excellent standard in order to ensure net zero is achieved in the Action Plan area.
Question T3.12: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.					
TP-004-032	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.12	Our clients have no objection to the proposed water resilience measures set out in Approach B but would urge the Council to consider the impact of additional requirements as part of the viability assessment.
TP-009-033	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.12	Our Clients support the Council's approach to water efficiency and seek to maximise water efficiency and drought resilience wherever possible through new development. As such Peel L&P support Approach B and agree with its inclusion within the Action Plan and design coding in its wider context. That said, there should be some recognition of development viability.
TP-027-009	Helen Sara Taylor	N/A	Topic Paper 3	T3.12	Approach B is preferred.
TP-030-021	Louise Gill	RSPB	Topic Paper 3	T3.12	Approach B is preferable. South Lancaster has had several major flooding event in recent years. All this building needs to account for resilience to the new and older housing stock with the Action Plan area, particularly considering the downstream effects. More needs to be done than just the Local Plan to ensure there a holistic catchment approach is found to ensure water is held back but also can drain quick enough.
TP-036-036	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.12	The Partial Review resulted in considerably more robust and ambitious policies regarding water resilience which would make Approach A more acceptable. However, on the basis that the Action Plan will extend beyond the Local Plan, then it makes more sense to explore opportunities that go beyond that within the Partial Review and therefore Approach B is preferred.
Question T3.13: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.					
TP-004-033	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.13	Our clients consider that a degree of consistency with the adopted Local Plan will be important in considering construction practices and as such is supportive of Approach A. Differing approaches from one part of the district to the other could lead to inconsistency and overlap between construction differences and achieving vision / goals. This may result in land in South Lancaster providing infrastructure to foster modal shift but then does not align with standards outside the Action Plan area. For the avoidance of confusion, additional requirements for construction practices should be avoided. That is not to say that more sustainable approaches could not be delivered, but this should be at the discretion of the developer, based on site-specific considerations. The Council may wish to incentivise such an approach.
TP-009-034	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.13	Our Clients support the principles and construction practices outlined in Policy DM30c of the Partial Local Plan Review but raise viability considerations to its application. Should either approach be taken there should be consideration for site-specific viability and a robust site viability review must be allowed at the planning application stage.

SUMMARY OF RESPONSE TO **TOPIC PAPER 3: ADDRESSING THE CLIMATE EMERGENCY** - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-027-010	Helen Sara Taylor	N/A	Topic Paper 3	T3.13	Approach B is preferred.
TP-030-022	Louise Gill	RSPB	Topic Paper 3	T3.13	Approach B is preferable. All building needs to be resilient into the future.
TP-036-037	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.13	On the basis that the Action Plan will extend beyond the Local Plan, then it makes more sense to explore opportunities that go beyond that within the Partial Review and therefore Approach B is preferred. The Parish Council is disappointed that the first development to be approved at Lawsons Bridge does not meet these standards with large amounts of materials being imported to raise levels.
Question T3.14: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.					
TP-004-034	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.14	Whilst our clients support the Council's ambition for fossil fuel free development as a policy direction, they would question the need for this to be enshrined in Action Plan policy, owing to the national and local policy timescales. This is particularly the case in relation to emerging building regulations which will be in place before the Action Plan is likely adopted.
TP-009-035	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.14	Our Clients endorse Approach A and support the phasing out of fossil fuels in line with national objectives and timescales. The use of renewable and low carbon energy in new development is supported by Peel L&P and will be required via the Future Homes Standards. However, there is an implication that development should aim to deliver 100% of the operational energy by renewables. Even assuming this on a net-basis, it is unlikely to be feasible on most development and may not be commercially viable.
TP-015-020	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 3	T3.14	The University's preferred approach is Approach B. This aligns with the University's Energy Strategy and commitments to reducing carbon emissions.
TP-027-011	Helen Sara Taylor	N/A	Topic Paper 3	T3.14	Approach B is preferred.
TP-030-023	Louise Gill	RSPB	Topic Paper 3	T3.14	Approach B is preferable. All new homes should look into the future and be fitted appropriately.
TP-036-038	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.14	The Action Plan is a unique opportunity for Lancaster to deliver large scale net zero development ahead of the Government's energy timetable and therefore fossil fuel is not supported and Approach B is preferred. The Parish Council is disappointed that the first development to be approved in this area - at Lawson's Bridge - has failed to meet such standards.
Question T3.15: Do you agree that new development in the AAP area should be fossil fuel stationary energy free from day one? If not, please explain your rational? What alternative date do you suggest and what suggestions do you have for decarbonising any new stationary energy in development in the AAP area?					
TP-024-023	Alban Cassidy	Cassidy & Ashton	Topic Paper 3	T3.15	Agreed if at all possible. If the development is mixed use there may well be excess heat generated by commercial uses which could feed into a district wide heating system.
TP-027-012	Helen Sara Taylor	N/A	Topic Paper 3	T3.15	Pointless developing with installed gas connections, therefore no further expansion of fossil fuel stationary energy.
TP-030-024	Louise Gill	RSPB	Topic Paper 3	T3.15	From day one. We should lead the way in sustainable development and how it should be done with the future in mind.
TP-036-039	Paul Holland	Scotforth Parish Council	Topic Paper3	T3.15	It is uneconomic to install gas infrastructure if it is to be abandoned within a few years therefore it makes sense for the Action Plan to be fossil fuel stationary energy free from day one.
Question T3.16: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.					
TP-004-035	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.16	<p>Our clients are generally supportive of the proposals for the LAEP and centralised energy network in the 'Broad Location for Growth'. However, very little information exists providing detail on how this will be managed and its implications on developers. Our clients would urge information on this to be published as soon as possible to provide certainty to all interested parties. This would align with approach B but, as mentioned, further clarity is required on this matter.</p> <p>Our clients also note that the topic paper, at paragraph 5.5.5 states that the LAEP is looking to secure net zero within the garden village. Whilst this is not disputed, clarity is sought to whether this will apply to the rest of the growth area. It is important that the Action Plan takes a consistent approach to the area as a whole.</p>
TP-009-036	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.16	Our Clients endorse Approach B and supports there being a joined up and co-ordinated approach to energy infrastructure across the Action Plan Area where it is practical and does not unnecessarily delay sustainable and energy efficient development. Peel L&P support designing development to be energy efficient, minimising energy demand where feasible and viable to do so.
TP-015-021	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 3	T3.16	The University's preferred approach is Approach B. Energy infrastructure planning should form a key part of the Action Plan, ensuring that there is sufficient capacity for future development, through consultation with utility providers and ensuring that is delivered in a sustainable manner.
TP-024-024	Alban Cassidy	Cassidy & Ashton	Topic Paper 3	T3.16	Approach B should be followed. In order to utilise renewable energy and make the development low carbon then the energy infrastructure needs to be well planned for. Opportunities to add renewable energy generation should be maximised.
TP-027-013	Helen Sara Taylor	N/A	Topic Paper 3	T3.16	Approach B is preferred, we must have a plan for the limits to growth and therefore expected energy use. The worry about a development area is that having a development area it is seen as a green light for overdevelopment. The limits to growth should be stipulated in the Action Plan and we must aim to limit physical growth.
TP-030-025	Louise Gill	RSPB	Topic Paper 3	T3.16	Approach B is preferable.
TP-036-040	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.16	Developing and operating an Energy Plan for the Action Plan area is a complex undertaking and it is unclear that it would be economic to achieve. Provided the policies have been set for net zero then the practical aspects of infrastructure planning can be left to the operators. Approach A is preferred.
Question T3.17: Do you agree that Local Area Energy Planning represent a logical starting point for understanding how energy will be generated and distributed across the wider 'Broad Location for Growth' and used a way to identify where the grid needs improvements in order to bring forward the ambitions of net zero development? If not, what would you consider the logical starting point to be?					
TP-004-036	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.17	Our clients do consider the LAEP represents a logical starting point, however require further clarity before confirming any support for the approach. As a further point of clarification, the topic paper refers to an Approach D which is not detailed. This is assumed to be a typographical error.
TP-009-037	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.17	Our Clients are supportive of the proposed LAEP approach to ensure that local constraints and opportunities to deliver sustainable energy generation are considered.
TP-024-025	Alban Cassidy	Cassidy & Ashton	Topic Paper 3	T3.17	Agreed, this is a logical approach.
TP-027-014	Helen Sara Taylor	N/A	Topic Paper 3	T3.17	Agree that the LAEP represents a logical starting point.
TP-036-041	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.17	Provided the policies have been set for net zero then the practical aspects of infrastructure planning can be left to the operators. Therefore full Local Area Energy Planning is not supported, except for the consideration of heat networks in the garden village. Para 5.7.1 refers to the preferred approach being Approach D, however this does not exist.
Question T3.18: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.					
TP-004-037	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.18	Our clients do not have a preferred approach at this stage as there is insufficient information to make an informed assessment. However, if the Council were to pursue a heat network, clarity would be required on what this will entail and how it would be delivered. If the financial burden of delivering a heating network is to be placed on the development industry then this must be factored into the viability assessment.
TP-009-038	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.18	In principle, our Clients are supportive of heat networks, however thermal demand density is required to make them viable and new energy efficient homes have a low thermal demand. They are more likely to be suitable where high thermal loads are present. On this basis, Peel L&P endorses Approach B which seeks to explore the feasibility of heat network delivery.
TP-024-026	Alban Cassidy	Cassidy & Ashton	Topic Paper 3	T3.18	Approach B is supported. This is the rational option that supports the basis of a heat network but not requiring such detail that would hold back development.
TP-030-026	Louise Gill	RSPB	Topic Paper 3	T3.18	Approach C is preferable.
TP-036-042	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.18	The consideration of heat networks is welcomed. Approach A is too passive but there is insufficient information to differentiate between Approaches B and C.
Question T3.19: Do you agree with the above represent a logical starting point for understanding heat network inclusion and delivery in the wider 'Broad Location for Growth'? If not, what would you consider the logical starting point to be?					
TP-004-038	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.19	Our clients would agree that the approach options for the heat network represent a logical starting point for consideration and the Action Plan would represent a suitable vehicle for the implementation of such a policy should the evidence demonstrate the approach has a sound basis. However, futher clarity is needed before any informed comments can be made on this matter.
TP-027-015	Helen Sara Taylor	N/A	Topic Paper 3	T3.19	Yes, agree that it represents a logical starting point.
TP-036-043	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.19	The logical starting point is the Council undertaking a HNDU funded heat network feasibility study
Question T3.20: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.					
TP-004-039	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 3	T3.20	<p>The 'Harnessing Community Energy' project appears to be reliant on the degree of public appetite for such a scheme. The levels of public interest are not known at this time and this should be explored further before the Council seeks to allocate land for such a use as it may prove undeliverable.</p> <p>It is also not clear where the land for such a use will come from, it is assumed this will be Council land but this will need to be confirmed if the project is to advance. Equally, if the land is expected to come from the development industry (or financial contributions made to it) then this will need to be factored in the viability assessment to ensure deliverability and does not impact on the delivery of new homes.</p>
TP-009-039	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 3	T3.20	In principle, our Clients support this aproach and endorses exploring models of community stewardship for local energy services, albeit this should be subject to wider site viability and other practical considerations. Any system must be commercially viable and robust and acceptable to future investors, funders and residents. At this stage Peel L&P do not have a specific approach to endorse on this matter as long as these are considered against viability and net zero considerations.
TP-024-027	Alban Cassidy	Cassidy & Ashton	Topic Paper 3	T3.20	Approach B is supported as it supports the principle of community energy projects specifically.
TP-027-016	Helen Sara Taylor	N/A	Topic Paper 3	T3.20	Approach C is preferred. The built environment should carry solar panels, green space should not be covered in solar panels. This is the problem we start to get with physical growth and increased energy demands.
TP-036-044	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.20	The Parish Council already have a renewable energy production within it and there have been tentative enquiries abut community energy projects. Therefore, it is important that the AAP explores the land allocation for such projects and/or appropriate community benefit funds associated with commercial developers. Approach D is supported.
Question T3.21: Do you consider opportunities for local food production to be an important component of development within the Broad Location for Growth? What methods of food production should be considered when balanced against development in this location? Please provide rationale to your response.					
TP-024-030	Alban Cassidy	Cassidy & Ashton	Topic Paper 3	T3.21	If local food production is part of the Action Plan, there should be land value equalisation for any such land used for that purpose to incentivise the use.

SUMMARY OF RESPONSE TO **TOPIC PAPER 3: ADDRESSING THE CLIMATE EMERGENCY** - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-015-022	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 3	T3.21	The University recognises that food production is a key focus of the Council and welcomes the reference to the continued partnership working with the University in order to explore opportunities on how and where this could be achieved.
TP-027-017	Helen Sara Taylor	N/A	Topic Paper 3	T3.21	Yes, opportunities for food production are important but place a great deal of faith in communities and require a tight reign on the type of development to facility community uses.
TP-030-027	Louise Gill	RSPB	Topic Paper 3	T3.21	Yes, all those set out in paragraph 6.2.4 and using land as multiuse such as crop and fruit trees with buffer strips to encourage bees.
TP-036-045	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.21	The Action Plan area is predominantly rural. Whilst the Parish Council accepts that the garden village will be placed in the area it is important that the remaining surrounding rural environment allows for authentic food production rather than excessive parkland and therefore a balance of traditional farms / small holdings should be part of the Action Plan. It is therefore important that Areas of Separation provide such opportunities. The opportunities described in the Topic Paper relate mainly to arable farming but sufficient consideration should be given to livestock farming also.
Question T3.22: Do you have any preferred approach from those described? Please give rationale for your answer? Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be?					
TP-027-017	Helen Sara Taylor	N/A	Topic Paper 3	T3.22	Approach B is preferred as once houses are in private ownership it is impossible to dictate the use to which owners put their own land.
TP-030-028	Louise Gill	RSPB	Topic Paper 3	T3.22	Approach C is preferable.
TP-036-046	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.22	It is important that the garden village is set in a broad band of rural environment which includes opportunities for food production. Therefore Approach C is supported.
Question T3.23: Do agree that community wealth building is an important component of any growth in South Lancaster and development within the 'Broad Location for Growth'? If not, please explain your rationale. What do you consider to be the key components of community wealth building which could be applicable to the emerging Action Plan?					
TP-027-018	Helen Sara Taylor	N/A	Topic Paper 3	T3.23	The number of houses, housing density and number of bedrooms should be limited from the start otherwise it will become a new town rather than a new village.
TP-030-029	Louise Gill	RSPB	Topic Paper 3	T3.23	It is important to ensure job opportunities locally to reduce travel and carbon emissions.
TP-036-047	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.23	The Parish Council have consistently states that the garden village will not be sucessfu unless there are a range of good local employment opportunities. The concept of community wealth is therefore very important. In that regard we wish to see a diverse range of employment provided in the locality.
Question T3.24: Are there are any other points you wish to raise which have not been captured in responses to other questions in this Topic Paper?					
TP-027-019	Helen Sara Taylor	N/A	Topic Paper 3	T3.24	It is critical that the Action Plan sets limits to growth, we must seek to retain as much green space as possible, seek to utilise brownfield sites as much as possible.
TP-037-006	Alice Watson	Natural England	Topic Paper 3	T3.24	<p>Natural England note that this Topic Paper focuses on addressing climate change through energy efficiency, sustainable design and sustainable construction on which we have no detailed comments to make.</p> <p>However, we would take the opportunity to advise on how climate change can be addressed through nature based solutions (Nbs). Nbs can contribute to reducing net greenhouse gas emissions and carbon sequestration as part of the Government's wider strategy for achieving net zero. Natural England support the use of Nbs to contribute to climate change mitigation and adaption, such as SuDS and the creation of wetland areas which provide several benefits for biodiversity as well as reducing flood risk.</p> <p>Natural England advises that you can contribute to climate change mitigation by avoiding developing on peat. Peat is a precious and irreplaceable resource.</p> <p>A development may affect the ability of the natural environment to adapt to climate change, including the ability to provide adaptation for people. The proposed development provides the opportunity to present nature based solutions on-site.</p>
TP-036-048	Paul Holland	Scotforth Parish Council	Topic Paper 3	T3.24	<p>The Action Plan area includes Lancaster University which has already declared it wishes to be carbon neutral by 2030 and net zero by 2035. The Action Plan therefore needs to address how the University and Council's net zero plans both compliment and compete and how each can help each other achieve net zero.</p> <p>The role of tree planting in addressing Climate Change has not been addressed in the Paper.</p>

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
GENERAL COMMENTS TO TOPIC PAPER 4					
TP-008-012	Peter Dutton	Gladman Developments	Topic Paper 4	T4.00	<p>Gladman notes that the application of garden village design principles (which have arisen from the JTP Masterplan) must not pre-determine the location of development in the Action Plan given the specific focus of the JTP work on the garden village.</p> <p>Gladman disagree with some of the findings of the Council's sensitivity assessment work and its recommendations. With its own assessment finding that development would be acceptable in this location and have developed a scheme wish would carefully respect the character of the land around Bailrigg Lane, avoiding any sort of physical or perceived coalescence between Hala and the hamlet of Bailrigg. In this respect Gladman believe the sensitivity asessment is incorrect to infer that the Council should avoid development that extends South due to potential coalescence.</p> <p>With regard to the Green Halo, Gladman believe that any such concept would be best achieved by overlaps and connectivity between green infrastructure assets, rather than specific policy designation. On the issue of local landscape designations, the Council must ensure it has a robust evidence base to justify the inclusions of such designations in the Action Plan. In relation to habitats, Gladman believe there are sufficient safeguards in place through the application of separate legislation and that specific designations in the Action Plan are not required. In relation to work on a GBI Strategy, this should form a resource, rather than identifying assets or allocations within the Action Plan itself. With regard to Biodiversity Net Gain, the Council should identify the mandatory 10% with the flexibility to go higher which is consistent with the national approach.</p>
TP-019-001	David Alexander	N/A	Topic Paper 4	T4.00	<p>Having read this consultation paper I full endorse the need to understand and respond to the topography of the area and the need to respect distinctive landscapes. It is importan that Section 2 on understanding the natural environment contains a introductory section which sets out a clear understanding on how this landscape and its biodiversity has come about over time, principally through the longstanding and continuous managment of both the landscape for a range of purposes. How far will these management arrangements be curtailed or ended within the Action Plan? How will the landscape and biodiversity continued to be managed, by whom and at what cost?</p> <p>It should be possible build on the content of para 2.1.1 which contains some good points, but should try and go further and build in the long term management and maintenance elements required.</p> <p>Whilst the Environment Act will be a useful tool for the Council, who is going to preside over Local Nature Recovery Strategies? Where will the expertise come from to ensure that the mandatory 10% net gain is delivered?</p> <p>Similarly, how will the management of the garden village take place amongst the important natural assets? Can some form of farming continue? Who will manage hedgerows? The landscape sensitive assessmnt provides a key basis for management and maintenance practices. Will the Council fund a management and maintenance team to work across the area or will this be outsourced to the private sector?</p> <p>The implementation of a GBI Strategy will be challenging for the Council and it is questioned whether they are best placed to undertake the work. One solution could be to secure local knowledge and expertise on matter from with the private and voluntary sectors.</p>
Question T4.1: Do you feel that the evidence base identified above represents a reasonable and proportional basis for the production of the Lancaster South Area Action Plan from a green and blue infrastructure perspective? If not, what gaps in the evidence do you think are missing?					
TP-004-040	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 4	T4.01	<p>Our clients welcome the level of evidence which has been identified in Table 3.1 and consider this combined to represent a suitable evidence base to prepare the Action Plan. It will be important that this evidence base is completed before the Council seek to make any further progression with the Action Plan, evidence should not be used to backfill the Action Plan, rather it should inform it. It is also important that these documents are released to the public as part of a wider consultation exercise so they are subject to proper scrutiny.</p> <p>There is a concern on the over reliance of the JTP Masterplan in the formulation of the topic papers as well as the emerging evidence base. If the focus is to remian on the JTP work then the supporting evidence will fail to address the needs of the wider growth area. Further clarity should be provided from the Council in regard to the status of the masterplan.</p>
TP-005-007	Christopher Carroll	Sport England	Topic Paper 4	T4.01	<p>It would preferred if outdoor sports is considered separately from open space as they are two different typologies and are rightly being assessed separately.</p>
TP-009-040	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 4	T4.01	<p>The list of evidence base documents in Table 4.1 is considered to be comprehensive. In addition the Council could consider commissioning a Heritage Assessment, Utilities Assessment and Soil and Agricultural Quality Report. Clearly further work is necessary to determine an appropriate methodology for calculating developer contributions.</p>
TP-018-005	Kim Wisdom	Lancashire Wildlife Trust	Topic Paper 4	T4.01	<p>The evidence presented seems reasonable and proportionate.</p>
TP-025-001	Jill Marie Bargh	N/A	Topic Paper 4	T4.01	<p>Very concerned that historical pastures and meadows are not being considered as this will be a significant loss to Lancaster's local heritage and food production capcity. The Action Plan need to best fit Lancaster's development needs and I believe that the development of the best and most versatile agricultural land should either be avoided altogether or at least minimised as an absolute last resort. The Action Plan needs to reflect on the direction of national policy in relation to protecting and conserving the natural environment.</p>
TP-027-020	Helen Sara Taylor	N/A	Topic Paper 4	T4.01	<p>I feel that any ecological evidence which starts from the current degraded baseline is unfit for purpose. This is not the baseline we should be working to, our baseline should be from the early to mid seventies when the ecological diversity was greater. The language of topic paper 4 suggests that biodiversity is not high on the list of considerations . To recover, nature needs large areas of continuous green spaces, not multifunctional spaces. When our green space is already so degraded, a 10% uplift is not sufficient.</p>
TP-030-030	Louise Gill	RSPB	Topic Paper 4	T4.01	<p>An ecological assessment needs to be undertaken at various times of the year to account for various species. This should cover the development areas to determine where / which species including breeding, feeding and wintering locations.</p>
TP-036-049	Paul Holland	Scotforth Parish Council	Topic Paper 4	T4.01	<p>It is not clear that the current contribution of trees within the Action Plan area has been taken account as part of the evidence base.</p>
Question T4.2: How can we seek to better incorporate/consider the historic environment within our assessment of GBI potential?					
TP-002-013	Matthew Symons	Hollins Strategic Land	Topic Paper 4	T4.02	<p>The JTP masterplanning work sought to consider heritage assets in the garden village area. HSL has previously proposed a small local centre which would be linked by pedestrians via the existing canal bridge at Carr Lane.</p>

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-004-041	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 4	T4.02	<p>Our clients welcome the strategy detailed between paragraphs 4.2.1 and 4.2.7 of the topic paper in relation to the historic environment and consider this to present a robust basis for the development of the Action Plan. Our clients recognise that this matter is being considered for the whole 'Broad Location for Growth' rather than just the garden village but would note the inconsistency approach between this and other matters discussed in the topic papers.</p> <p>Notwithstanding this, our clients note the intention to use the Council's own Conservation Team to compile the heritage evidence base. Our clients would question, in the interests of robustness, whether it would be more pertinent for an independent assessment to be carried out. There may be instances where proposals for GBI conflict with heritage assets and, in such circumstances, it may be prudent for independent assessment to provide an objective assessment. Our clients consider this to be necessary in order for the Action Plan to be considered sound.</p>
TP-009-041	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 4	T4.02	Our Clients supports the identification of Lancaster's rich heritage within the Action Plan but Peel L&P do not think there is a need for further incorporation of the historic environment within the assessment of GBI potential as there is sufficient protection within existing Local Plan policies.
TP-025-002	Jill Marie Bargh	N/A	Topic Paper 4	T4.02	Considers that there is evidence of agriculture and droving routes dating back to roman times. Further research should be done into Agricultural History / Development and whether people appreciate historic green landscapes. Any proposals should minimise the loss of agricultural land and maximise the delivery of biodiversity net gain.
TP-027-021	Helen Sara Taylor	N/A	Topic Paper 4	T4.02	The Council need to be open about any pressures exerted by the University to identification of land in South Lancaster and the long term ambitions of the University relating to energy generation.
TP-036-050	Paul Holland	Scotforth Parish Council	Topic Paper 4	T4.02	It is difficult to define what is of historic significance, this can be rather subjective. It would appear that ancient historic has been covered in the archaeological assessment but more recent history may require an alternative approach.
TP-035-016	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 4	T4.02	We have no particular comment on improvements other than, having gone through the preparation of a Neighbourhood Plan we are very conscious of the need to protect the historical environment, including appropriate design codes.
Question T4.3: Do you agree that the 8 Design Principles set out in the JTP Masterplan represent a logical starting point for understanding how landscape-led development could be achieved across the wider 'Broad Location for Growth'? If not, what would you consider the logical starting point to be?					
TP-002-014	Matthew Symons	Hollins Strategic Land	Topic Paper 4	T4.03	<p>HSL agrees that the landscape-led approach is required for development within the garden village and that the 8 principles identified represent a logical starting point.</p> <p>Design principle 3 seeks to retain visual separation and landscape buffers to existing development within the garden village. It is important that principle 3 recognises that there may be exceptions to the hard rule that there must be landscape buffers to existing properties.</p> <p>Design principle 4 seeks to create a green halo within the garden village. HSL agrees that this would represent an attractive and beneficial feature but, as with design principle 3, it must be considered to be a starting point. The precise route of the green halo will require careful consideration, taking account of existing landscaping features, potential POS areas and developable areas within land in HSLs interests.</p>
TP-004-042	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 4	T4.03	Our clients agree with, and are supportive of the principles detailed in the topic paper pertaining to the landscape-led approach. The principles in themselves are considered to be an appropriate starting point but, any approach needs to be applicable to the wider 'Broad Location' rather than the garden village area. Our client considers that, whilst the principles of the approach are considered sound, they should be focused on the wider growth area as a starting point which is then condensed into the various sub-areas, including the garden village. It is essential that, in the interests of soundness for the Action Plan, that the underpinning strategy and design principles relate to the whole Action Plan area.
TP-009-042	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 4	T4.03	Whilst our Clients support the design principles and the work undertaken to date, it is considered that additional work should be undertaken as part of the Action Plan process.
TP-015-023	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 4	T4.03	The University is in agreement with the 8 design principles set out in the JTP Masterplan, however the University Campus needs to be considered in a similar way to that of existing settlement. If the Action Plan considers urban extensions the same design principles should be applied.
TP-025-003	Jill Marie Bargh	N/A	Topic Paper 4	T4.03	I accept the design principles apart from point 5. I reject the notion that the garden village area of search is a monoculture. Whilst there is mainly only one crop (grass) there are many different variety of grasses. Grasslands in South Lancaster possess healthy nutrient rich soils. The 'Green Halo' idea is okay but I do not feel it is necessary to surround development where there is already wonderful wildlife corridors - for example Lancaster Canal.
TP-027-022	Helen Sara Taylor	N/A	Topic Paper 4	T4.03	It is not possible to balance a range of ambitions, you need to prioritise and it doesn't seem to me that biodiversity is top of the list otherwise this site would not have been identified as an area suitable for growth.
TP-030-031	Louise Gill	RSPB	Topic Paper 4	T4.03	The JTP Masterplan incorporates joined up habitats which is good for species movement. It should be ensured that roads do not segregate environments by installing bridges thatallow the habitats continue undisturbed. Some areas should have people / pets excluded.
TP-037-007	Alice Watson	Natural England	Topic Paper 4	T4.03	Natural England in principle concur with the 8 design principles, however we would advise these should be landsape and biodiversity led with an emphasis to restore the biodiversity on-site and ensure there are no conflicts between any high value existing habitat and that to be created.
TP-036-051	Paul Holland	Scotforth Parish Council	Topic Paper 4	T4.03	The Parish Council broadly agree with the 8 design principles set out in the JTP Masterplan which should be applied across the whole Action Plan area. These principles will ensure that development is focused on creating a vibrant garden village and that any other development resembles countryside hamlets.
Question T4.4: Do you think any of the recommendations of the Landscape Sensitivity Assessment should be prioritised? If so which ones? What policy mechanisms do you think the Area Action Plan should include to help deliver some of these recommendations?					
TP-004-043	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 4	T4.04	Our clients do not seek to draw conclusions on what particular recommendations should be prioritised from the Landscape Sensitivity Assessment. This is question best answered by the Council. It is considered that the Action Plan should seek to strike the right balance between the policies and recommendations, noting it might not be possible to meet every single recommendation.
TP-009-043	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 4	T4.04	The recommendations from the Landscape Sensitivity Assessment form a robust set of guiding principles which would serve to guide and underpin strong and landscape responsive proposals. The relevance of each recommendation / conclusion will vary from site to site.

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-015-024	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 4	T4.04	<p>The University agrees with the following recommendations and believes these should be prioritised:</p> <ul style="list-style-type: none">- Point D: Retain and enhance tracts of woodland bordering on Lancaster University.- Point E: Promote and enhance the wider parkland setting of Lancaster University. <p>This can be secured through the Action Plan by ensuring that new landscape buffers are created. Where possible these buffers should be use existing landscape features but this should not result in 'no development' areas within the University estate. The development of buffers should therefore involve the University to ensure that the campus is protected.</p> <p>The University would query the chosen study area of the Landscape Sensitivity Assessmnt which does not match the Broad Location for Growth identified on the Local Plan Policies Map. The assessment does not include an area to the East of the M6. It is important that the evidence base aligns wiht the entire Action Plan area.</p>
TP-024-031	Alban Cassidy	Cassidy & Ashton	Topic Paper 4	T4.04	The Landscape Sensitivity Assessmnt seems to indicate that much of the proposed development is more sensitive to development than that alongside the A6 corridor. It is therefore considered that more consideration should be given to development in this area.
TP-025-004	Jill Marie Bargh	N/A	Topic Paper 4	T4.04	Recommendations A, B and C are the most important priorities here. I also agree there is plenty of room for the university to extend parkland.
TP-027-023	Helen Sara Taylor	N/A	Topic Paper 4	T4.04	Yes, instead of using the euphemism of a 'Green Halo' we should be creating uninterrupted connections to areas such as those managed by the Fairfield Association.
TP-030-032	Louise Gill	RSPB	Topic Paper 4	T4.04	Delivering the green infrastructure for the wildlife that will be displaced is a high priority and ensuring vegetation to cool waters and provide better habitats. People and dogs should be excluded from some areas to ensure there are safe undisturbed habitats.
TP-037-008	Alice Watson	Natural England	Topic Paper 4	T4.04	<p>We advise the recommendations should be landscape-led but also consider the aspects of the wider landscape and ecological receptors which may be impacted by the design of the development and ensure they do not conflict with other policy mechanisms within the plan.</p> <p>We advise that you may wish to further strengthen wording regarding recommendation A for delivering Green Infrastructure, instead of using the word minimise we advise this could say 'prevent impacts where possible' to strengthen the aim within the Action Plan. You may also wish to consider expanding recommendation E by setting out what green infrastructure could be delivered wihtin the wider parkland setting such as native landscaping.</p> <p>For Securing Access Natural England advise that recommendation B should be expanded to set out how green infrastructure will be promoted within east-west trave; connections such as green bridges and sustainable transport corridors have significant potential to be multi-functional GBI networks wiht low carbon modes of travel.</p>
TP-036-052	Paul Holland	Scotforth Parish Council	Topic Paper 4	T4.04	<p>The Parish Council considers the Sensitivity Assessment to be helpful and its broader recommendations are generally supported. The recommendations are wide-ranging and the Parish Council would not wish to see any recommendation diluted or not fully followed because other recommendations are deemed to be of a higher priority.</p> <p>It should be noted that the Parish Council have begun work on their Neighbourhood Plan (NP) which will consider existing land forms in the area and the removal / arrival of soils to raise levels. The enhancement of polices to address the NP groups concern on these matters could be made through the Action Plan and/or NP.</p>
Question T4.5: Do you have a preferred approach to the 'Green Halo' from those described? Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.					
TP-004-044	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 4	T4.05	<p>Whilst noting that the green halo is something which relates solely to the garden village, our clients are broadly supportive of the concept when referring to sites of ecological interest (although it is not clear what planning policy status this would have or the mechsansims over how it would be achieved).</p> <p>The concept of a green halo appears to have evolved through the JTP Masterplanning work which seems to provide more of a landscape function as opposed to ecological function. If the Council continue to pursue such a feature, it must ensure that this is the correct approach for the Action Plan area as a whole, based on sound evidence, and not just retrofitted to the wider area from the JTP Masterplan.</p> <p>Our clinet does consider this concept should be something which is set as an ambition wihtin the Action Plan, although clear evidence would need to demonstrate what its purpose would be and how it would be delivered. If the expectation that this feature is to be delivered by the development industry then this would need to be viability tested to ensure any requirements for a green halo are not overly onerous. It is also important to recognise that not all development parcels will be able to accommodate such landscaping feature and so there will need to be flexibility within any subsequent policies.</p> <p>The green halo concept can only be carried forward where it can be demonstrated that it would not undermine the aims and objectives of Policy SG1. Approach C is considered to be the most suitable at this time, clearly a green halo can be landscape led but it needn't be its sole purpose, it could have a number of functional roles which add to the sustainability of the wider area.</p>
TP-009-044	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 4	T4.05	Overall, our Clients support the 'Green Halo' approach and endorses its role of creating 'Green Halo' landscape. Peel L&P endorse Approach B and is strongly of the view that this should be carried forward via the Action Plan. The 'Green Halo' would sit naturally to the south of the Whinney Carr site and create distinct areas of natural separation.
TP-010-004	Tim Bettany Simmons	Canal & Rivers Trust	Topic Paper 4	T4.05	Section 4.3.4 depicts 8 design principles to inform the landscape-led approach, with all of these the canal is central. It is positive that this landscape-led approach is the starting point for the design process. We note that the assessment work undertaken in the JTP Masterplan fails to take into account that much of the canal offside is tree-lined and should be considered alongside the 4 woodlands in terms of connectivity and retention of existing habitat. The Green Halo Study should take this into account. In terms of question T4.5 Approach C can consider not just landscape but ecological benefits.
TP-011-003	Stephen Harris	Emery Planning on behalf of Wainhomes	Topic Paper 4	T4.05	We consider that the approach to Green Halo is appropriate for the Garden Village and Approach C would be appropriate as it should be a multi-functional area. However, as set out in other responses, this should not preclude development opportunities for a northern extenion to Galgate.
TP-015-025	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 4	T4.05	The University's preferred approach is Approach C. The Green Halo should, as set out by JTP, be circular and provide sufficient offset within the garden village to its eastern and western boundaries, therefore ensuring between the garden villge and the campus.
TP-024-032	Alban Cassidy	Cassidy & Ashton	Topic Paper 4	T4.05	Approach A. The idea of a 'green halo' seems somewhat artificial and may result in barriers between the development and existing built-up ares where more integration may result in more sustainable land use. Rather than simply adopting a 'green halo', a site-by-site approach could be undertaken to enhane the landscape setting whilst making the most efficient use of land.
TP-025-005	Jill Marie Bargh	N/A	Topic Paper 4	T4.05	Approach C is preferred. Then both human and wildlife populations can both enjoy the outdoors. If funds do not permit the building of new paths then at least try and accommodatethe wildlife. Would like to see investment in the canal towpath to make it navigable for cycling and walking.
TP-027-024	Helen Sara Taylor	N/A	Topic Paper 4	T4.05	Green areas should remain as large as possible and with approaches which prioritise growth in ecological value and increased biodiversity.
TP-030-033	Louise Gill	RSPB	Topic Paper 4	T4.05	Approach C is preferred. The 'Green Halo' can also provide habitat and expand the bluebell woods currently present. Therefore ensuring the righth type of native trees and other graded habitats from grassland to woodland.

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-036-053	Paul Holland	Scotforth Parish Council	Topic Paper 4	T4.05	The Parish Council have consistently stated the critical importance of Areas of Separation for the Action Plan area and garden village development. The JTP principle of a 'Green Halo' is supported as a mechanism for re-establishing woodland which has multi-functional purposes. However, the 'Green Halo' must be seen as part but not the whole of the JTP principle of 'Green Buffers'. The Parish Council does not consider a 'Green Halo' to provide sufficient buffers between development and would not represent a sufficient element of land for Area of Separation. The Parish Council consider Approach C to be the most appropriate.
TP-037-009	Alice Watson	Natural England	Topic Paper 4	T4.05	Natural England advises that when considering the 'Green Halo' the decision should be landscape and biodiversity led. Depending on the habitat that will be used to create a 'Green Halo' it should be placed where the best opportunities are to protect and enhance the surrounding habitat to support nature recovery within the area.
TP-035-017	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 4	T4.05	Approach B is preferred.
Question T4.6: Do you agree with the Council's preferred approach to Local Landscapes ? If not, please explain your preferred approach and the rationale for your choice.					
TP-002-015	Matthew Symons	Hollins Strategic Land	Topic Paper 4	T4.06	It is considered that a bespoke approach to identifying areas of local landscape value may be required. However, given the likelihood that each parcel within the garden village will be informed by a detaled masterplanning process it may not be necessary.
TP-004-045	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 4	T4.06	Our clients are supportive of the approaches set out in the topic paper in relation to local landscape designations although they note that the Council do not explicitly state their preferred approach. Whilst the general principles are supported, it is important that the requirements are not overly onerous as to stifle development and the delivery of new homes. It is also important that the strategy of protecting landscapes does not conflict wiht th wider delivery in the 'broad location for growth'.
TP-009-045	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 4	T4.06	It is not clear from the Topic Papers or SA work which approach the Council considers to be a logical starting point. Approach A and B seem to reflect more positive compatibility in relaiton to the objectives of the SA. If it is identified that new local landscape designations are required, the starting point should be existing designations, including the criteria which underpinned them. That would be in line with Approach A but may be a further version of Approach B. Consideration should be given to national guidance on this matter.
TP-015-026	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 4	T4.06	The University's preferred approach is Approach C. It is not considered that adding another layer of different policy to that of the Local Plan is not necessary or justified. Instead the Action Plan should build on the existing landscape designations in the Council's evidence base and Local Plan to use a criteria based approach to inform new development.
TP-024-033	Alban Cassidy	Cassidy & Ashton	Topic Paper 4	T4.06	Approach C seems to take account of the Landscape Sensitivity Assessment and therefore seems an appropriate basis for consideration of particular land-uses.
TP-025-006	Jill Marie Bargh	N/A	Topic Paper 4	T4.06	Approach C is preferred on the basis that my preference is to have several smaller settlements, rather than one large settlement using too much agricultural land. Having green buffers between settlements would be preferable.
TP-027-025	Helen Sara Taylor	N/A	Topic Paper 4	T4.06	The Council have already given up on this, it is already an urban landscape.
TP-030-034	Louise Gill	RSPB	Topic Paper 4	T4.06	Approach B is preferred. The Council needs to designate areas to prevent the onslaught of planning applications . The plan is required to protect our wildlif but also provide facilities / infrastructure required for such a large development.
TP-036-054	Paul Holland	Scotforth Parish Council	Topic Paper 4	T4.06	The Parish Council consider Approach B to be the most appropriate because it applies the same defintions around local landscape designations as those identified in the adopted Local Plan. The Parish Council would wish to see the area along the western side of the M6 remain open as part of a local landscape designation. In additional Approach B will allow the flanks of Whinney Carr to be fully evaluted in the context of the Action Plan.
Question T4.7: Do you agree with the Council's preferred approach in relation to the protection of existing habitats? If not, please explain your preferred option and the rationale for your choice.					
TP-002-0016	Matthew Symons	Hollins Strategic Land	Topic Paper 4	T4.07	The Action Plan should seek to protect existing habitats wherever possible, enhancing biodiversity throughout. The Net Gain approach will require careful consideration and discussion with the development industry and landowners.
TP-004-046	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 4	T4.07	Of the two options identified by the Council at paragraph 4.8.17 it would, in the interests of soundness, appear prudent for the Council to identify and designate any key wildlife habitats for protection within the Action Plan. If a masterplan for the whole area were to be advanced then the identification of any key habitat areas would form a key component of the masterplan. It is important that the ecological evidence prepared as part of the AAP aligns with the 'Broad Location for Growth' and not just the garden village area. Notwithstanding this, it is apparent within the topic paper that the current strategy is heavily predicated on the JTP masterplan and is not considered to represent an appropriate basis for a wider Action Plan strategy. Whilst underlining principles may well be transferable, it is key that the starting point needs to be the whole SG1 area.
TP-009-046	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 4	T4.07	Our Clients support the general principles of protection of habitats that are of higher ecological value. Peel L&P endorses Approach A as this will protect and highlight valued habitat across the Action Plan area. This will potentially provide insight on the provision of suitable offsets as part of the overall Biodiversity Net Gain Strategy.
TP-010-005	Tim Bettany Simmons	Canal & Rivers Trust	Topic Paper 4	T4.07	Section 4.8 relates to ecology and notes Lancaster Canal as a wildlife corridor. Whilst the canal is considered a wildlife corridor it does not take into account the tree-lined canal in terms of connectivity. Many of the species mentioned rely on the wider canal corridor for feeding, breeding and shelter and there is concern that some of this habitat will be lost to development. In terms of question T4.7 then Approach A is preferred.
TP-015-027	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 4	T4.07	The University's preferred approach is Approach B.
TP-018-006	Kim Wisdom	Lancashire Wildlife Trust	Topic Paper 4	T4.07	The Trust's preferred Approach would be Approach A.
TP-024-034	Alban Cassidy	Cassidy & Ashton	Topic Paper 4	T4.07	Approach A should be the starting point but a criteria based assessment alongside the need for Biodiversity Net Gain should be considered for the remainder of the sites under consideration.
TP-025-007	Jill Marie Bargh	N/A	Topic Paper 4	T4.07	Approach B is preferred. I see little point designating habitats when there is agricultural land which already providers many natural habitats. My request is that the use of agricultural land is minimised so there is plenty of natural habitat remaining for wildlife.
TP-027-026	Helen Sara Taylor	N/A	Topic Paper 4	T4.07	Both approaches would leave concern that appraisals are only looking to avoid habitat loss rather than aiming to limit development and seeking to retain and upgrade all green areas. I would view Approach A as the least worst option.
TP-030-035	Louise Gill	RSPB	Topic Paper 4	T4.07	We agree the existing habitats need to be protected to prevent degregation such as the bluebell wood west of the canal in Galgate which would be destroyed with increased footfall off the path.

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-036-055	Paul Holland	Scotforth Parish Council	Topic Paper 4	T4.07	The Parish Council prefers Approach A with the objective of identifying and protecting key wildlife species within the Action Plan. Wherever possible key species should be protected in their existing habitats and locations. Where this is not possible then relocation should be sought within the Action Plan area. The Parish Council were disappointed that the first application to be permitted in this area have not sufficiently met these standards.
TP-037-010	Alice Watson	Natural England	Topic Paper 4	T4.07	Natural England welcomes the Council's approach to existing habitats and advises Approach A would be best to complement the Local Nature Recovery Networks process. The Action Plan should make reference to the emerging Lancashire Local Nature Recovery Networks as a strategic tool for mapping existing habitats could be enhanced or restored. Natural England further advises Approach A should make reference to the emerging Recovery Networks as a mechanism to target locations of potential Green Infrastructure enhancements.
TP-035-018	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 4	T4.07	We find the concept of +10% net biodiveristy difficult to understand in the context of such a large development but trust this is achievable. It seems likely that such gains will have to be off-site and, as such, considering the constraints to the east of the Action Plan area and our proximity to the Lune Estuary may well impact on our Parish. Whereas we would welcome increased biodiversity we would welcome involvement in this aspect, such that any changes are not detrimental to our parishioners.
Question T4.8: Do you have a preferred approach to Biodiversity Net Gain from those described above? Please give a rationale for your answer. Are there any other approached which should be explored? Please provide further detail on what you believe those approaches to be.					
TP-004-047	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 4	T4.08	<p>Our clients considered that in regards to biodiversity net gain (BNG) targets, the Action Plan should be consistent with national planning policy and set a reliance on the mandatory 10% target. Whilst the Action Plan could be worded to invite a higher percentage such as 'at least 10%' our clients consider the 10% figure should be used.</p> <p>If the Council were to advance an Action Plan which included higher targets, these would require extensive justification and would need to be underpinned by highly robust evidence.</p>
TP-009-047	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 4	T4.08	Our Clients support Approach A, this should be carried forwsrd through the preparaion of the Action Plan so that it is in line with the Environment Act which will require a mandatory 10% Net Gain. Peel L&P do not support the approach to adopt a high percentage of net gain as this would be contrary to the Act. Some areas may be constrained to deliver the required proposals / mitigation so expecting more than 10% as part of the Action Plan may be unrealistic. However, it is possible that some sites could provide more than 10% but this should be encouraged rather than required.
TP-012-005	Joanne Harding	Home Builders Federation (HBF)	Topic Paper 4	T4.08	The HBF considers that more detail will be needed in relation to these approaches in order for consideration to be given to whether they are appropriate, would be viable and would work in practice. The HBF considers that the Council should work closely with landowners and developers to determine whither these potential approaches would be appropriate. However, it is likely that a flexible approah that potentially covers elements from a number of these approaches would be the most suitable policy moving forward.
TP-015-028	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 4	T4.08	In relaition to required Biodiversity Net Gain contributions, further information is needed on the potential percentage requirement beyond 10%. It is difficult at this stage to identify a preferred approach without knowing the implications to acheivability or viability.
TP-018-007	Kim Wisdom	Lancashire Wildlife Trust	Topic Paper 4	T4.08	Work on the JTP Masterplan made clear that development in this area should be exemplar, if so the Option B should be adopted for the Aciton Plan which seeks to deliver Net Gain above the mandatory 10% minimum.
TP-024-035	Alban Cassidy	Cassidy & Ashton	Topic Paper 4	T4.08	Approach B. A development of this scale should aspire to go beyond simply a policy-compliant scheme. The majoritu of the landscape is nature depleted agricultural land and there is potential for significant improvement incuding using surrouding land with the Action Plan area.
TP-025-008	Jill Marie Bargh	N/A	Topic Paper 4	T4.08	The development of garden village uses productive agricultural land which is a double whammy for agricultural food production. Whether Approach A or B is selected it is important that development is on the less valuable land.
TP-027-027	Helen Sara Taylor	N/A	Topic Paper 4	T4.08	Approach B is preferred. To recover, nature needs large areas of continuous green spaces not multi-functional recreational corridors. When our green space is already so degraded then 10% biodiversity net gain is not sufficient.
TP-030-036	Louise Gill	RSPB	Topic Paper 4	T4.08	Approach B is preferred. The higher proportion of Net Gain will allow for the money to be spent on improving designated grassland and woodland of the local area including signage and wardening of the area to ensure its continued to be improved over time.
TP-037-010	Alice Watson	Natural England	Topic Paper 4	T4.08	Natural England would welcome a Biodiversity Net Gain (BNG) target which is greater than 10%, however this would need to be viable and fully evidencedas it may not be achievable. As pointed out in the Sustainability Appraisal report targets which are greater than 10% may not be feasible, however the use of green roofs and walls may represent opportunities boost net gain delivery. We further note that the Nature Recovery Networks may have implications on the types of BNG that can be created both on-site and off-site.
TP-036-056	Paul Holland	Scotforth Parish Council	Topic Paper 4	T4.08	The Parish Council believe that the Action Plan should set higher standards than those set by Central Government on the basis that the local Council has a better understanding and commitment to Biodiversity Net Gain and therefore Approach B is supported.
Question T4.9: Do you have any preferred approach to Biodiversity Net Gain Delivery from those described? Please give a rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.					
TP-004-048	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 4	T4.09	Our clients do not have a preferred option to the delivery of BNG at this stage. They would however urge the Council to ensure that whatever approach is taken that it is flexible and can allow for deviations on a site-specific basis.
TP-009-048	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 4	T4.09	Our Clients support Approach D and using the evidence which is tailored to the Action Plan area. If habitats of value have been identified and designated as potential enhancement through net-gain this would make it clearer where off-site delivery should be targeted. Whilst we would encourage on-site net gain, sometimes this is not always appropriate - therefore flexibility is required.
TP-015-029	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 4	T4.09	The University's preferred approach is a combination of Approaches B and C. As part of exploring Approach C, the Council should engage with landowners in the South Lancaster area to consider opportunities to form part of the Biodiversity Net Gain bank for parcels of the garden village and other development. The University would be happy to meet with the Council to discuss potential opportunities associated within the University estate.
TP-018-008	Kim Wisdom	Lancashire Wildlife Trust	Topic Paper 4	T4.09	It is difficult to provide a conclusive response on this matter, it is likely that a hybrid approach is required but any direction provided in the Action Plan should be reflective of national policy and legislation.
TP-024-036	Alban Cassidy	Cassidy & Ashton	Topic Paper 4	T4.09	Approach C. This will assist in meeting the original aspiration for land value equalisation by giving land value to land within the Action Plan area which may not be developed.
TP-025-009	Jill Marie Bargh	N/A	Topic Paper 4	T4.09	Approaches C or E are preferable. This should remain flexible as all farmers in and out of the area and will be looking to receive funds from grant or sale for removing this land from production. If designations need to be made, then less productive marginal land yielding less food or difficult to farm due to steep gradients, thins soils would be a logical choice.

SUMMARY OF RESPONSE TO TOPIC PAPER 4: GREEN BLUE INFRASTRUCTURE BIODIVERSITY - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-027-028	Helen Sara Taylor	N/A	Topic Paper 4	T4.09	I have concerns over the whole credit theory in this context regardless of whether credit be related to carbon or net gain. Approach C is not attractive. However, I am not clear which approaches cover on-site only, which cover off-site only and which cover both. Based on the desire for interconnectivity for the benefit of nature and wildlife preference would be an approach which covers both.
TP-030-037	Louise Gill	RSPB	Topic Paper 4	T4.09	Approaches C and D are both favourable. To identify areas on and off site locally where residents will influence due to increased numbers. The co-ordinated approach will allow for a variety of improvements to be made and the key species focused on.
TP-037-011	Alice Watson	Natural England	Topic Paper 4	T4.09	We advise that Approach D would be the approach that would assist the strategic, evidence-based delivery of BNG within the Action Plan, therefore delivering benefits to both biodiversity and the local community, as well as achieving other benefits such as flood risk and air quality improvements. Natural England advise that whilst there should be flexibility within local policy to favour off-site strategic sites rather than always aiming to achieve on-site BNG delivery as a strategic approach, your authority should also take into account the need for Green Infrastructure within local communities.
TP-036-057	Paul Holland	Scotforth Parish Council	Topic Paper 4	T4.09	The Parish Council believe there is no justification for Approach E whereby proposed Biodiversity Net Gain is offset. The Parish Council recognise that there may be some sites in the Action Plan area which may struggle to achieve Net Gain but they should simply partner with other landowners whose areas have been designated for GBI. The Parish Council therefore reject Approaches A and B. Approaches C and D are the only ones which the Parish Council can support, Approach C put the onus on the landowners whereas Approach D places the onus on the Action Plan itself. Approach C is the preferred with the provision that Net Gain is clearly secured via planning condition.
Question T4.10: Do you agree with the principles of soil protection set out above? Do you feel that any principles are more important than others? Do you foresee any barriers to implementing these principles through planning policy in the AAP?					
TP-009-049	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 4	T4.10	The guiding principles highlight a useful set of aims and objectives that can be applied at a variety of scales and at various stages of the design / construction process to reduce the impacts on soil. However, mechanisms for and the practical delivery of these principles need careful consideration in terms of meeting the requirements of potentially competing elements, for example maintaining landscape character and views, habitat enhancement and net gain.
TP-018-009	Kim Wisdom	Lancashire Wildlife Trust	Topic Paper 4	T4.10	The Trust is in complete agreement with the soil principles identified.
TP-025-010	Jill Marie Bargh	N/A	Topic Paper 4	T4.10	I agree with your principles here, as little land as possible should be used so that the most valuable and fertile land is retained.
TP-027-029	Helen Sara Taylor	N/A	Topic Paper 4	T4.10	Yes, I agree with the principle of soil protection set out in Section 4.14.
TP-030-038	Louise Gill	RSPB	Topic Paper 4	T4.10	The RSPB agrees with the principles set out Professor John Quinton and his team at Lancaster University.
TP-036-058	Paul Holland	Scotforth Parish Council	Topic Paper 4	T4.10	The Parish Council are pleased to see the principle (b) of engagement with local communities and consider the discussion topics to be part of that process. The purpose of the Action Plan is to produce a comprehensive and cohesive plan for the foreseeable future and the Parish Council expect soil management to be determined in the Action Plan, including through design codes.
TP-037-012	Alice Watson	Natural England	Topic Paper 4	T4.10	<p>The detailed consideration of soils and their management is welcomed, this should be based on site-specific soil information derived from detailed agricultural land and soil surveys. Further advice is provided on the detail and content of the bullet points presented:</p> <ul style="list-style-type: none">- Bullet point (c) should include any proposed habitat creation / landscaping / GI- The current focus of bullet point (d) is an important point and should consider the outcomes of 'Benefitting from Soil - Management in Development and Construction' produced by the BSSS.- Bullet points (e), (f) and (g) also relate to soil management, which need to be informed by a site-specific soil survey, Mitigation should aim to minimise soil disturbance and retain as many ecosystem services as possible through careful soil management during the construction process and appropriate soil re-use. <p>Defra has published a Construction Code of Practice which provides overarching advice on the use and protection of soil in construction projects, including the movement and management of soil resources. This should be referred to in the Action Plan. The topic paper should also state that any soil handling should be supervised by an appropriately experienced soil expert and should take place in the dryer summer months where soils are dry and friable. Soil handling methods should normally be as specified in Defra's Construction Code of Practice.</p> <p>In summary, it should be made clear that all allocations and subsequent planning should be informed by a detailed soil and agricultural land survey, a soil management plan is prepared setting out the soil handling requirements to ensure sustainable management of the soil resource and reference is made to Defra's Construction Code.</p>
TP-035-019	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 4	T4.10	We agree that the correct handling of soils and development will not only be ecologically beneficial but that retention of soils on site and minimising soils which are sent to landfill will be of benefit to the wider area.
Question T4.11 Do you have any preferred approach to implementing a Green & Blue Infrastructure Strategy from those described? Please give a rationale for your answer. Are there any approaches which you think are missing? Please provide further detail on what you believe those approaches to be.					
TP-004-049	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 4	T4.11	Our clients do not have a preferred approach to the implementation of a GBI Strategy. They would however urge the Council to ensure that whatever approach is taken that the policy requirements are not overly onerous or restrictive. It should be clear how expectations will be delivered, when it is to be delivered and by who. This should also be factored into viability testing.
TP-005-008	Christopher Carroll	Sport England	Topic Paper 4	T4.11	Sport England would not support the use of standards to secure sports pitches and other outdoor sports facilities.
TP-009-050	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 4	T4.11	Our Clients support Approach B. The use of landscape-led design is underpinned by the identification of landscape opportunities and constraints. A landscape framework can then be developed to identify cells for development, incorporating and interwoven with a strong multi-functional network of green spaces.
TP-010-006	Tim Bettany Simmons	Canal & Rivers Trust	Topic Paper 4	T4.11	Section 5 deals with implementing a GBI Strategy, in terms of Question T4.11 then our preferred approach is Approach E.
TP-015-030	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 4	T4.11	The University's preferred approach is a combination of Approaches B and C. Approach A is not preferred as it does not provide enough guidance to developers and GBI may therefore be missed. Conversely Approaches D and E are considered to be too restrictive and does not provide sufficient flexibility for various types of GBI to come forward. Additional policy allocations for GBI are not necessary as part of the Action Plan to further restrict development but instead the Action Plan should utilise existing allocations and evidence base to guide development.
TP-018-010	Kim Wisdom	Lancashire Wildlife Trust	Topic Paper 4	T4.11	The Trust do not think that Approach A would be appropriate and would consider a hybrid of Approaches D and E would be preferable.
TP-024-037	Alban Cassidy	Cassidy & Ashton	Topic Paper 4	T4.11	No preference other than Approach A. There should be some degree of policy requirement to ensure a coherent and constructive Green and Blue Infrastructure base to avoid it being delivered in a piecemeal fashion.

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-025-011	Jill Marie Bargh	N/A	Topic Paper 4	T4.11	Approach B is preferred. Definitely need to set of key design principles and a suide to how you expect GBI to be delivered. It is assumed that funds for transport and biodiversity net gain is to come from developers. If 9,000 houses are to be built make the roof tax affordable to developers to pay for the necessary infrastructure, if an unnecessarily large amount of development takes place it would be easy to draw green and blue corridors, but if only 3,500 houses are required then the extra expense of the spine road and the concept of the garden village may not be required. This may be preferable.
TP-027-030	Helen Sara Taylor	N/A	Topic Paper 4	T4.11	Approach E seems to provide the greatest potential for Net Gain but it depends on the standards and thresholds set. Arguably, key strategic green and blue corridors should be identified, protected and enhanced and measures taken to prevent development creep in the future.
TP-030-039	Louise Gill	RSPB	Topic Paper 4	T4.11	Approach E is preferable. The approach needs to have the locations and standards clearly defined to ensure delivery of the green and blue infrastructure.
TP-036-059	Paul Holland	Scotforth Parish Council	Topic Paper	T4.11	The Parish Council have consistently supported the concept of a comprehensive and cohesive Action Plan which ensures a high quality of GBI. The Parish Council have consistently objected to piecemeal planing applications that do not support that comprehensive picture. The Parish Council have no faith in developers making positive decisions over GBI. Therefore the Parish Council endorse Approach D whereby land is allocated for GBI in the Action Plan and Approach E whereby GBI standards are set higher in the Action Plan than those in the Local Plan.
TP-037-013	Alice Watson	Natural England	Topic Paper 4	T4.11	Natural England agree that either Approaches B, C, D and E would provide the most benefit for implementing the findings of the GBI Strategy. It is important the strategy protects and enhances existing green infrastructure as well as incorporating new infrastructure. Natural England have just launched a new national framework of standards for green infrastructure which should be considered.
TP-035-020	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 4	T4.11	Approach C is preferred.
Question T4.12: Are there any other points you wish to raise which have not been capture in responses to other questions in this Topic Paper?					
TP-009-051	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 4	T4.12	Our Clients have reviewed the ecological evidence undertaken by RSK and this provides a good understanding and indicative summary of potential ecological constraints. However, it misses out on site specific granularity. It is therefore crucial that each project carries out their own detailed Net Gain Assessment to ensure that it is as accurate as possible going forward into site-specific masterplanning.
TP-010-007	Tim Bettany Simmons	Canal & Rivers Trust	Topic Paper 4	T4.12	Development could lead to an increase in nutrient levels and thus higher densities of INNS Canadian Waterweed such as found in the more urban areas of Lancaster. A sufficient vegetative buffer would help to combat this effect.
TP-025-012	Jill Marie Bargh	N/A	Topic Paper 4	T4.12	Another proposal put forward. It is clear a lot of work has gone into this project to date however the reasons for such growth are wrong as there is not a need for new housing due to changes in immigration and the level of empty properties which exist in the City. Further work should be done to move students out of family housing and HMOs into more purpose-built student accommodation. Reductions in housing growth in this area would lead to better and more extensive opportunities for environmental enhancements and the reduction in a requirement of new infrastructure, for instance road, which would improve development viability.
TP-027-031	Helen Sara Taylor	N/A	Topic Paper 4	T4.12	I strongly feel that South Lancaster should not have been identified as an area for development growth on the basis that amenities and facilities are already available to the north of the City. If development in this location goes ahead, clear limits to physical growth must be set otherwise there will be overwhelming pressure for further development.
TP-036-060	Paul Holland	Scotforth Parish Council	Topic Paper 4	T4.12	The Parish Council was disappointed not to be explicitly consulted on the GBI and Development Site Assessment methodologies over the summer of 2021. Whilst the methodologies are generally robust they are heavily reliant on assessments made by professional consultants. The Parish Council recommend that local residents who know the land should be employed to take part in the assessment activity.
TP-037-014	Alice Watson	Natural England	Topic Paper 4	T4.12	Natural England note the topic paper does not include mention of peat. Peat is a precious and irreplaceable resource and deep peat is highlighted within the Action Plan area. Natural England would strongly support the omission of peat from development, peat can be very difficult to restore, recreate or restore once destroyed. Development design should not compromise future rewetting and restoration of peat deposits. We wish to highlight thatpeat requires a specific set of hydrological, physical, chemical and microbial conditions to accumulate. Therefore, peat is vulnerable to enrichment which may arise from activities such as elevated nutrients which may be found in water discharges. We advise that as part of the Action Plan process you may wish to avoid areas of pet being developed or being sealed in and use them as BNG habitats in a tailored ay, perhaps linking to green infrastructure. We further advise that the Action Plan is a good opportunity to ensure that they reflect the Local Nature Recovery Networks which became manditory in April 2022 and requires a strategic approach to habitat enhancement and protection.
TP-035-021	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 4	T4.12	In allocating green spaces which are distributed throughout the garden village we are concerned that the resultant smaller parcels of land will be unsuitable for agricultural use. This could lead to the break-up of these parcels into even smaller units. Whereas this may be desirable for some land-uses such as orchards and allotments, this can also lead to unsightly developent and unauthorised semi-permanent residential development.

SUMMARY OF RESPONSE TO **TOPIC PAPER 5: WATER MANAGEMENT** - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
GENERAL COMMENTS TO TOPIC PAPER 5					
TP-008-013	Peter Dutton	Gladman Developments	Topic Paper 5	T5.00	In relation to discharge rates, Gladman believe that the Council should adopt an approach that is consistent with the requirements of standardised national guidance and commonly applied guidelines, including climate change allowances and allowance for urban creep. The same applies to the approach to a drainage hierarchy, with regard to this matter Gladman question whether it is approach or necessary to be prescriptive on the sustainable drainage componetns which would be deemed acceptable in the Action Plan area. Gladman consider that in relation to the manangement of SuDS components, Approach B is preferable.
TP-010-008	Tim Bettany Simmons	Canal & Rivers Trust	Topic Paper 5	T5.00	In order to assess how the canal can be potentially used to reduce flood risk and incorporate drainage, any discharge to the canal will need to be assessed throug the Trusts SWD mandatory process. The Trust is not a land drainage authority but we are happy to consider the potential for attenuation flows of surface water to the canal. This would be subject to a separate commercial agreement with the Trust. In response to paragraph 6.2.4 and Approaches A-D we would need to see that the flood risk to the canal is not increased.
TP-022-001	Liz Locke	Environment Agency	Topic Paper 5	T5.00	Points raised includes: - Providing detailed comments on the drainage strategy is not within our remit and we are not resourced to provided this service as part our flood / coastal management function. Notwithstanding this, if it becomes apparent that there is a potential for surface water to have an impact we could raise this with you as part of our strategic overview function. - We are generally in agreement with the documentation which has been currently presented for the Action Plan. We would be satisfied for proposals for surface water drainage for development parcel to be developed in accordance wiht these documents, along with subsequent amendments and mitigation measures identified.
TP-035-022	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 5	T5.00	Topic Paper 5 has little impact on our Parish and therefore we have limited input on this issue. However, in general terms we wish to be assured that the various comments received from representatives attending Parish Liaison Events are considered, in particular knowledge of local flooding issues.
Question T5.1: Do you feel that the evidence base identified above represents a reasonable and proportional basis for the production of the Lancaster South Area Action Plan from a water management perspective? If not, what gaps in the evidence do you think are missing?					
TP-004-050	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.01	Our clients welcome the evidence identified by the Council from the water management perspective as well as recognising that the evidence used for the Local Plan is somewhat dated and requires update as part of the Action Plan process. It is noted that a large part of this evidence base is yet to be prepared and would therefore urge this is published as soon as possible. Our clients are somewhat concerned that the evidence seems to be heavily weighted towards the JTP masterplan area which is not consistent with the 'Broad Location for Growth' identified via Policy SG1. Therefore in the interests of soundness and robustness, evidence needs to be prepared in regard of the whole Action Plan area.
TP-007-012		Thurnham with Glasson Parish Council	Topic Paper 5	T5.01	The evidence will be a starting point but it is likely that a big proportion will be generic facts and may not take into account the implications to the wider catchment area.
TP-009-052	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.01	The list of evidence base documents in Table 4.1 is considered to be comprehensive. In addition the Council could consider commissioning a Heritage Assessment, Utilities Assessment and Soil and Agricultural Quality Report. Clearly further work is necessary to determine an appropriate methodology for calculating developer contributions.
TP-017-001	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.01	The Lead Local Flood Authority (LLFA) gnerally agree with the evidence base set out. However, reference to 'Drainage Strategy' should be amended to 'Flood Risk Assessment & Sustainable Drainage Strategy' to better reflect the work which is being undertaken.
TP-036-061	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.01	The Parish Council have provided details on the following areas of flooding - Hazelrigg Lane at the Motorway underpass; Blea Tarn Road close to Blea Tarn Reservoir; Bailrigg Lane at Low Hill; Burrow Heights Lane at Burrow Cottages; Tarnwater Lane at Lower Burrow; Ou Beck near Five Ashes Lane; Ou Beck at Highland Brow and Burrow Beck at the culvert under the Canal.
Question T5.2: Do you feel that the sources of flood risk identified represent all sources? If not, what sources do you think are missing?					
TP-004-051	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.02	Our clients consider the sources of flooding identified by the Council at paragpah 5.1.1 represent an appropriate basis for the development of the Action Plan and its evidence base.
TP-007-013		Thurnham with Glasson Parish Council	Topic Paper 5	T5.02	Not all sources are considered. It is difficult to accept that allowances can be made for the likes of Storm Desmond and hence the likes of this development will provide an even greater catchment area and faster run off. The University Campus should be included as a major flood risk source of which it has been since its inauguration. More work is needed to reduce surface water discharge and rate of discharge from the campus.

SUMMARY OF RESPONSE TO **TOPIC PAPER 5: WATER MANAGEMENT** - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-009-053	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.02	Our Clients suggest that 'pumping stations' are explicitly mentioned in the list at paragraph 5.1.1
TP-017-002	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.02	The sources of flood risk should include - Coastal, Fluvial, Canal, Groundwater, Reservoir, Surface Water and Sewer. It is crucial that current and future flood risk from these sources are considered, taking into account Climate Change. The LLFA advise that flooding from these sources are assessed for their respective design in the context of national policy. The Council will need to carefully consider how fluvial flood risk will be identified, as there may be additional ordinary watercourses in the area other than those currently mapped and modelled. In addition, any analysis of flood risk will need to carefully consider groundwater flood risk up-front, noting there is no statutory consultee on this matter.
TP-036-062	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.02	<p>There are a number of large water pipelines in the area. Whilst we expect Unite Utilities to monitor and maintain them so they do not burst but there have been incidents where developments have burst water mains. Therefore it would be sensible for United Utilities to provide evidence of where any major burst would flood to.</p> <p>It is not clear whether the run-off from the motorway has been considered. This was the source of flooding in Bailrigg in November 2019.</p>
Question T5.3: How should intermittent flood risks and those from unidentified watercourses/culverts and private systems which are not currently mapped be identified?					
TP-004-052	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.03	<p>Our clients recognise the difficulties in obtaining such information. In order to counter this as best as possible, our clients would support provision in the Action Plan for site-specific drainage information to be required as part of planning applications.</p> <p>It is not considered realistic to expect that all unmapped watercourses / culverts or private systems to be mapped as part of the Action Plan process, but development proposals can play a role in provide information on a site-by-site basis that will, over time, catalogue information.</p>
TP-007-014		Thurnham with Glasson Parish Council	Topic Paper 5	T5.03	A comprehensive and detailed survey of watercourses will need to be carried out identifying tributaries of all types along with the flow route before any calculations can be decided. Furthermore, this type of survey would need to be applied when flows are quite ample to highlight any source.
TP-009-054	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.03	A review of the flood mapping and site reconnaissance should be undertaken that looks at overland flood flow routes identified by LIDAR and that there are checks on site for interaction with culverts, field drains etc.
TP-017-003	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.03	Extensive investigations and modelling will be needed to assess the flood risk from systems which are not currently mapped in order to establish this up-front. These constraints may not be identified until detailed surveying and ground investigations have been undertaken by developers on their individual sites. The Council need to ensure there are robust policies within the Action Plan so that if any previously unidentified systems are discovered the associated flood risk can be robustly assessed and mitigated by the developer. It is also important to note that flood risks associating from drainage features, where they fall outside the definition of an ordinary watercourse, may require specific investigation.
TP-034-001	Andrew Leyssens	United Utilities	Topic Paper 5	T5.03	<p>It is important to ensure that the approach to flood risk management and masterplanning ensures that any on-site flood risk from the public sewer system is understood and avoided. Whilst all forms of sewer flood risk are referenced in the topic paper we wish to emphasise that the approach to flood risk assessment and masterplanning must take account of flood risk from all sources including flood risk from public sewers. Details of this approach are set out in paragraph 161 of the NPPF and within Planning Practice Guidance.</p> <p>We have reviewed the boundaries for the Action Plan area and wish to note there are areas of the site where there are existing public sewers within or near to the area which are predicted to be at risk from flooding and/or sites where there is a record of previous flooding from the public sewer. This flood risk should be avoided in accordance with national policy. We would welcome the opportunity to liaise with your external consultants on any sewer flood risk that exists. We would seek to ensure that any flood risk is avoided via the preparation of the Action Plan, however it would be prudent to ensure the Plan includes an appropriate policy provision to manage the risk of sewer flooding. Example wording is provided within the full response.</p> <p>We recommend that the flood risk assessment assesses the impact of reservoir flood risk on development in the Action Plan area. Our initial review suggests that this principally affects land to the east of the M6 and a small area to the west of the motorway. In the first instance this risk would be most appropriately avoided, thereafter development will need to address any increase in cost to the reservoir operator as a result of development occurring downstream of the reservoir. In such circumstances, which we recommend are avoided, you would need to ensure that policy appropriately addresses the matter.</p>

SUMMARY OF RESPONSE TO **TOPIC PAPER 5: WATER MANAGEMENT** - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-036-063	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.03	The Parish Council considers that the engagement of the Action Plan team with Parish Councils and Local Flood Groups provide good opportunity to share local knowledge.
Question T5.4: Do you agree with the council’s preferred approach in terms of identifying and protecting area at flood risk from development? If not, please explain your preferred approach and the rationale for your choice.					
TP-004-053	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.04	Our client considers that areas known to be at risk from flooding should be identified within the proposals map, drainage strategy and GBI Strategy, as they will clearly impact on the way that growth in the area develops over time. This should not necessarily be a barrier to all development and our clients would urge the Council to align itself with national planning policy in this respect, to allow for the sequential testing of sites to ensure that, if needed, sites can come forward for development in areas of risk, subject to certain conditions and based on the vulnerability of development. This approach most closely aligns with approach B.
TP-007-015		Thurnham with Glasson Parish Council	Topic Paper 5	T5.04	All areas at flood risk should be protected from development given these areas will be even more at risk as a result from proposed development and these areas may become instrumental in alleviating flooding elsewhere.
TP-009-055	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.04	Although Approach A would result in the least impact and is a fair starting point, there may be some merit in not being too prescriptive (i.e. Approach C) as a flexible approach may allow for mitigation and enhancements to be incorporated into design and layout.
TP-015-031	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 5	T5.04	<p>The University does not agree that Approach A is the most appropriate way to protect from flood risk. The University does not consider it appropriate or necessary to identify and protect flood risk areas from development within the Action Plan. This is not in accordance with national or local policy and the blanket approach that this would result in.</p> <p>Instead, a sequential approach should be taken to avoid areas at the highest risk of flooding in the context of local and national planning policy. There is sufficient existing direction to consider proposals on a case-by-case basis, taking account of potential mitigation measures. Therefore Approach C is considered to be most appropriate.</p>
TP-017-004	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.04	The LLFA agree with Approaches A, B and C as all offer consistency with national policy, however we recognise that Approach A will result in the best overall integrated strategy for managing flood risk in the locality.
TP-024-038	Alban Cassidy	Cassidy & Ashton	Topic Paper 5	T5.04	Approach A is acceptable and accords with national planning guidance.
TP-034-002	Andrew Leyssens	United Utilities	Topic Paper 5	T5.04	Yes, we support the Council's approach.
TP-037-015	Alice Watson	Natural England	Topic Paper 5	T5.04	We advise the Council's preferred approach will deliver the best outcome for nature via incorporating the drainage strategy into green and blue infrastructure (GBI). We are highly supportive of the use of GBI to minimise flood risk as it provides benefits including flood storage and urban cooling to support climate change mitigation.
TP-036-064	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.04	Approach A, involving protecting areas from flood risk, is the only sensible approach. Developing in these areas will not only be more costly in providing flood mitigation but will be socially unjust for the people living there.
Question T5.5: Do you agree with the approach within the JTP Masterplan (page 98) as a starting point to understand how water can be managed across the wider ‘Broad Location for Growth’ or should the policies within the AAP and the Drainage Strategy go further to manage water and reduce flood risk? If not, what principles would you wish to be considered?					
TP-004-054	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.05	<p>Our clients do not disagree with the approach (in general terms) as set out on page 98 of the JTP Masterplan, as it is right that discharge and run-off rates should not be increased as a result of development of a site. Howeverm our client remains concerned by the idea of using the masterplan as a 'starting point'.</p> <p>Our clients are somewhat concerned that the evidence seems to be heavily weighted towards the JTP masterplan area which is not consistent with the 'Broad Location for Growth' identified via Policy SG1. Therefore in the interests of soundness and robustness, evidence needs to be prepared in regard of the whole Action Plan area.</p>
TP-007-016		Thurnham with Glasson Parish Council	Topic Paper 5	T5.05	JTP have established a starting point, but these are just standard generic options. This scheme will create further risk to already vulnerable communities such as Lower Thurnham, Glasson, Conder Green, Ashton and Galgate. The A588 is susceptible to frequent flooding and this scheme can only increase the vulnerability. Further thought and in-depth research should be taken over a much wider area.
TP-009-056	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.05	Peel L&P would agree with this approach.

SUMMARY OF RESPONSE TO **TOPIC PAPER 5: WATER MANAGEMENT** - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-017-005	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.05	The LLFA generally agree with the approach set out in the Masterplan, subject to the necessary Climate Change allowances being applied. However, it should be ensured that ponds are not prescribed as the only attenuation component and should instead promote a variety of multi-functional SuDS components in series to manage water and deliver benefits beyond just water quality, quantity, amenity and biodiversity.
TP-024-039	Alban Cassidy	Cassidy & Ashton	Topic Paper 5	T5.05	The JTP Masterplan has no weight at this time and therefore the Action Plan and accompanying Drainage Strategy should address the issues of water management in detail.
TP-034-003	Andrew Leyssens	United Utilities	Topic Paper 5	T5.05	<p>In the first instance, the view of United Utilities is that the surface water should discharge to an alternative to the public combined sewer. We see no reason why this should not be the case on an area such as South Lancaster. Our expectation is therefore a foul connection to the public sewer. In seeking to secure a foul only discharge to the public sewer, it will be critical that the necessary discharge rights to nearby water bodies are secured. We wish to emphasise that policy should ensure a co-ordinated approach to infrastructure delivery. This should be allocation-wide and not fragmented as a result of land ownership which would lead to sub-optimal approaches to surface water management.</p> <p>With regard to foul management, co-ordinated approach is equally applicable in the context of the delivery of sustainable development. The strategy for drainage should ensure that the need to pump water is minimised and if pumping is necessary, a proliferation of foul water pumping stations should be minimised. With regards to the reduction of flood risk, we would welcome the opportunity to work with the Council on the drainage strategy to consider whether development presents an opportunity to remove surface water from the public sewer system.</p>
TP-036-065	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.05	In accepting that South Lancaster will transform the current rural environment into one large community the Parish Council expect that in return all longstanding flood issues are alleviated for existing communities - this is considered to be a mandatory part of the community benefit the existing community gains for the loss of their rural environment. Therefore the Parish Council does not agree with the intention of paragraph 6.2.4 about not providing for a reduction of flood risk and asks that the Action Plan and accompanying Drainage Strategy explicitly identify and alleviate the existing flooding problems.
Question T5.6: Should run-off be reduced below greenfield rates?					
TP-004-055	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.06	Our clients do not consider that there is a legitimate basis for requiring run-off rates post development to be lower than greenfield run-off rates. They are firmly of the view that greenfield rates should be the benchmark which development proposals are assessed against in terms of surface water drainage and surface run-off.
TP-007-017		Thurnham with Glasson Parish Council	Topic Paper 5	T5.06	Run-off should be reduced below the greenfield rates given that the proposed scheme will increase the non-permeable surface area significantly and result in an increased run-off rate.
TP-009-057	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.06	There is growing concern that base flows can be adversely impacted where run-off rates are reduced too low. In addition for smaller sites it may become harder to effectively control run-off rates if the values are less than 1 litre per second.
TP-017-006	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.06	<p>In specific circumstances, it may be appropriate to take a catchment based approach to run-off rates below the equivalent greenfield run off rates where there is an associated downstream flood risk and robust evidence can be provided to demonstrate that this will result in a decreased risk. It will be critical that any policies which take such an approach to be fully evidenced and justified.</p> <p>However, it is also important to consider the volume of run off from the site which can be reduced by utilising source control to maximise infiltration. Other measures, such as natural flood management should also be used to reduce downstream flood risk.</p>
TP-030-040	Louise Gill	RSPB	Topic Paper 5	T5.06	With Climate Change and the increase in heavier rainfall, it is advantageous to reduce run-off rates below greenfield rates as this allows for some future proofing. It also can take land back to previous rates when greenfield sites were covered in woodland.
TP-034-004	Andrew Leyssens	United Utilities	Topic Paper 5	T5.06	This ultimately a matter for the Council to consider, along with the LLFA and Environment Agency and potentially the Canal and River Trust dependent on the receiving body, for example the capacity of any culverts. In order to meet the requirements of planning policy, flood risk must not increase. The key requirement of United Utilities is ensuring no surface water discharges to the existing public sewer.
Question T5.7: Do you agree with the council's preferred approach in terms of setting out attenuation requirements and peak discharge rates? If not, please explain your preferred approach and the rationale for your choice.					

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TP-004-056	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.07	<p>Our clients position in this regard more closely aligns to Approach D as they consider that regard should be had for national guidance for attenuation rates an peak surface water discharge rates but the requirement for such need not be stipulated within planning policy. This is partly because the matter is dealt with under separate legislation and also because a policy could be overly prescriptive.</p> <p>Whilst development proposals will clearly have to have regard to national policy through their detailed design, it is not considered necessary to have specific policies in the Action Plan which prescribe attenuation and discharge rates. Should the Council be minded to advance this issue, it could be provided within a Supplementary Planning Document (SPD) to act as guidance on matters of drainage.</p>
TP-007-018		Thurnham with Glasson Parish Council	Topic Paper 5	T5.07	<p>The preferred approach should be Approach A to allow for higher requirements and increased peak run-offs. It does not seem that the effects on the areas adjacent to the route and at the mouth of the River Conder are being factored in. There are other development over and above the Bailrigg Scheme already on going or proposed which have not factored in downstream and on areas further afield. The capacity and sizes of the attenuation ponds need to be shown more precisely.</p>
TP-009-058	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.07	<p>Peel L&P would agree with this approach.</p>
TP-015-032	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 5	T5.07	<p>The University's preferred approach is Approach B. This is because the Action Plan should align with the Partial Review of the Local Plan. The Action Plan should not seek to adopt a different policy to that in the Local Plan (as in Approach A) as this would create an additional layer and introduce further drainage requirements which would cause confusion and is not considered to be necessary or justified.</p>
TP-017-007	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.07	<p>The LLFA agree with Approach B which offers consistency with the LLFAs own advice.</p>
TP-024-040	Alban Cassidy	Cassidy & Ashton	Topic Paper 5	T5.07	<p>Approach B represents a rationale and policy compliant approach to setting out attentuation requirements and peak discharge rates.</p>
TP-036-066	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.07	<p>Whilst Approach B ensures that the Action Plan is consistent with the Partial Review of the Local Plan, it is likely that the Action Plan will have a longer timeframe and therefore if Approach A provides for higher drainage standard then that should be followed otherwise there is a risk that the next iteration of the Local Plan will have higher standards than the Action Plan.</p>
Question T5.8: Do you agree with the council’s preferred approach in terms of identifying and safeguarding land for flood alleviation/mitigation? If not, please explain your preferred approach and the rationale for your choice.					
TP-002-017	Matthew Symons	Hollins Strategic Land	Topic Paper 5	T5.08	<p>HSL support the broad objectives set out in the Topic Paper and recognises the Council has aspirations to utilise the garden village to reduce flood risk downstream. HSL are aware of the flood issues which affect Galgate to the South due to having development schemes in that area. The Action Plan could adopt similar approaches where land within FZ2 and FZ3 could be used for flood storage. This could acheive flood risk betterment downstream to the benefit of nearby communities.</p>
TP-004-057	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.08	<p>Our client does not object to the concept of identifying broad locations for flood alleviation and/or mitigation as part of the Action Plan, although this would clearly need to form part of a masterplanning exercise for the whole 'Broad Location for Growth'. It is true that the nature of any alleviation / mitigation measures would be dependent on the form of development proposal which could only be determined on a site-by-site basis.</p>
TP-007-019		Thurnham with Glasson Parish Council	Topic Paper 5	T5.08	<p>We do not agree with preferred Approach B and would choose Approach A. The land and areas for flood alleviation / mitigation should be definitive rather than indictive to prevent any future development on these areas.</p>
TP-009-059	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.08	<p>Peel L&P would agree with this approach.</p>
TP-017-008	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.08	<p>The LLFA agree with Approach B. This is the preferable to Approach A as flood risk management authorities do not currently have a strong pipeline for future flood alleviation schemes, meaning it is unlikely the robust evidence of the viability of future schemes to support Approach A could be created.</p> <p>Not safeguarding land, under Approach B, is preferable as developers will still be expected to provide betterment under policies within the Action Plan. This presents significant opportunities for Flood Risk Management Authorities to work with developers to deliver privately funded flood alleviation schemes.</p>
TP-024-041	Alban Cassidy	Cassidy & Ashton	Topic Paper 5	T5.08	<p>Approach B is agreed but areas identified for flood alleviation should be part of the land equalisation process and should be identified via the Action Plan unless sufficient land is not available. Such areas should be regarded as part of the new development space.</p>

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TP-030-041	Louise Gill	RSPB	Topic Paper 5	T5.08	Due to the flooding in Galgate, at least development is being drained into Ou Beck, it is suggested that Approach A should be used to ensure that the discharge rates when the Beck is at its highest discharge is decreased to ensure Galgate is more future proofed. Development provides a good opportunity to increase attenuation and reduce the discharge of Ou Beck upstream from Galgate. It is also suggested that the discharge rates for Burrow Beck also takes into account new housin and other potential housing upstream.
TP-034-005	Andrew Leyssens	United Utilities	Topic Paper 5	T5.08	<p>We would welcome the opportunity to discuss the difference between Approach A and B with the Council. We can concerned with the reference to 'indicative areas' and that Approach B may not provide sufficient clarity to the overall approach to surface water management / flood alleviation. Areas of existing flood risk must be clearly identified and avoided alongside a clear strategy for managing water and flood risk from all elements and development.</p> <p>This will be critical to ensure that each phase understands its role in delivering a co-ordinated approach to the delivery of drainage and flood risk management infrastructure. In this regard, the design of the new road infrastructure must be linked to the drainage and flood management across the site and the strategy to deliver new infrastructure. The new road could be a conduit for new foul, surface water and clear water infrastructure and this needs early and careful and consideration.</p>
TP-037-016	Alice Watson	Natural England	Topic Paper 5	T5.08	Natural England is supportive of interlinking flood alleviation / mitigation areas to the GBI Strategy. We advise you may wish to consider the best opportunities for biodiversity within the Action Plan area, such as the creation of wetland habitats.
TP-036-067	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.08	Approach B essentially safeguards land that could potentially provide flood alleviation and is therefore the only sensible approach. All other approaches could result in such land being developed and thereby removing this source of flood alleviation forever.
Question T5.9. Do you agree with the principles in the JTP Masterplan? If not what principles should be considered and provide your rationale.					
TP-004-058	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.09	Our clients do not disagree with the strategic water management principles identified within the JTP Masterplans, noting that these are somewhat generic in nature. There are concerns over the reliance on the JTP Masterplan as the starting point for consideration on these matters. This is considered to be unsound and the Council should reconsider its strategy to be based on the whole 'Broad Location for Growth' without relying on a strategy which has been subject to little scrutiny and has only been developed for one part of the Action Plan area as a whole.
TP-007-020		Thurnham with Glasson Parish Council	Topic Paper 5	T5.09	It is not clear what the principles are? Is this reference to the Water Management only or to the JTP Masterplan? The JTP Masterplan lacks transparency and is trying to promote the area as being poor in both ecological and environmental quality when in fact it is not. It is one of the most natural landscapes remaining, far more ecologically and environmentally substantial than anything the JTP masterplan can achieve.
TP-009-060	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.09	<p>Peel L&P would agree with this approach. Peel L&P are aware of the flooding risks and concerns that communities in the South of Lancaster have and agrees that new development must ensure that flood risk mitigation is properly considered and included where necessary, ensuring flood and drainage management is incorporated within new schemes to prevent new flood and not make it worse elsewhere. Green and Blue spaces can play a key role in offsetting these risks as well as being relatively cost effective.</p> <p>Peel L&P also supports the principle that development should enhance water retention and slow the flow of water where appropriate and possibly with above ground SuDS schemes.</p>
TP-017-009	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.09	Principle A of the JTP Masterplan is currently restrictive in the nature of SuDS components that could be integrated into the Action Plan. This should be updated to ensure that ponds are not prescribed as the only attenuation component and should lead to the promotion of a variety of SuDS components to create multi-functional benefits. In addition, a fifth principle around source control should be added to reflect national planning practice guidance and a sixth principle of natural flood management should also be added to reflect the ambitions of the Action Plan to provide betterment.
TP-030-042	Louise Gill	RSPB	Topic Paper 5	T5.09	Reduction of river discharge at high flows to protect communities downstream.
TP-034-006	Andrew Leyssens	United Utilities	Topic Paper 5	T5.09	Yes we are supportive of the principles in the JTP Masterplan insofar as they relate to drainage. In accordance with our submissions to the Partial Review of the Local Plan, it is critical that careful consideration is given to the efficient use of water. We believe that the optional standard for water use in Building Regulations should be the minimum requirement.

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TP-037-017	Alice Watson	Natural England	Topic Paper 5	T5.09	The value of water resources should be considered, drought resilience can be made by holding back water in the catchment and allowances for natural flood management could be made. This includes allocating areas to naturally flood or additional wetland provision. Natural England would welcome opportunities to create, enhance or restore habitats which connect to the designated sites. A wider network of wildlife-rich corridors and spaces can have multiple benefits to both nature and people.
TP-036-068	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.09	The JTP water management principles do not appear to recognise that flooding is often the result of blocked culverts or drains where responsibility rests with the landowner. There should be a principle that landowners are responsible for maintenance and clearance of watercourses and bear the full cost of works if they are carried out by other third parties.
Question T5.10. Should the plan require the use of above ground multifunctional sustainable drainage systems to be used within development?					
TP-004-059	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.10	Whilst multi-functional sustainable drainage systems is commonplace as part of modern development, it is not considered to be relevant to the Action Plan to stipulate that these are required within development proposals. Rather, it is considered that the Action Plan should advocate SuDS in more general terms to allow flexibility in approach and allow for the best solution on a site specific basis. Providing specific requirements for all development proposals is considered to be too onerous.
TP-007-021		Thurnham with Glasson Parish Council	Topic Paper 5	T5.10	The requirement for SuDS being used is critical along with attenuation and slow conveyance system. Furthermore, we would like to see how the likes of traffic pollution run-off from the proposed development into these schemes is going to be addressed.
TP-009-061	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.10	Peel L&P would agree with this approach. WSP would also highlight that if this is promoted it should be involved in a masterplanning process. There are many cases where a 'multifunctional space' that includes water being excluded from open space - a joined up approach is to be encouraged.
TP-017-010	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.10	Yes. The LLFA expects development proposals to deliver multi-functional benefits via SuDS. Multifunctional drainage systems are those which deliver a wide range of additional biodiversity and environmental net gains beyond water quality, quantity, amenity and biodiversity benefits. All proposals are expected by national planning policy to provide multiple benefits where possible. If multifunctional systems are not being provided, evidence should be provided by developers to show why such techniques are not possible in line with paragraph 59 of the National Planning Policy Framework.
TP-030-043	Louise Gill	RSPB	Topic Paper 5	T5.10	Yes, these will provide extra habitat and increase biodiversity. Some should be used / managed for habitat with the reduction of people / dogs entering.
TP-034-007	Andrew Leyssens	United Utilities	Topic Paper 5	T5.10	Yes. An over-reliance on traditional piped and tanked storage systems should be identified as not acceptable in policy terms. Development in this area is an excellent opportunity to plan for development with a high quality design. Sustainable drainage which reflects the 4 pillars of sustainable drainage is a key component of good design outlined in Building for a Healthy Life. A multi-functional approach to sustainable drainage should be clearly outlined in the GBI strategy and allocation-wide drainage strategy.
TP-037-018	Alice Watson	Natural England	Topic Paper 5	T5.10	Natural England advises the use of natural processes should be used in the first instance, including the use of nature-based solutions. We further advise that in some circumstances, SuDS attenuation basins can be designed to hold no or limited water, only filling when in flood conditions. However, in peat and other wetland habitats, this may not always be the most tailored option to on-site habitats and their enhancement.
TP-036-069	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.10	The concept of an integrated Blue and Green Infrastructure points to sustainable drainage (SuDS) being multi-functional in supporting biodiversity and open space therefore the Action Plan should take this course.
Question T5.11: Do you agree with the council's preferred approach in terms of the sustainable drainage hierarchy? If not, please explain your preferred approach and the rationale for your choice.					
TP-004-060	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.11	Our client agrees that Approach B is the most appropriate approach to pursue at this stage but agrees that additional evidence is required to support any deviation in approach. Our client is not opposed to the introduction of multi-functional drainage systems but considers that any requirement should be underpinned by robust evidence. Any specific requirements however are considered to be too onerous.
TP-007-022		Thurnham with Glasson Parish Council	Topic Paper 5	T5.11	Approach B as the preferred approach seems to be acceptable but we would like clarity on how and the types of water treatment system is applied.

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TP-009-062	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.11	Peel L&P would agree with this approach as it follows the path of guidance on such matters and likely updates to the current non-statutory technical standards for SuDS.
TP-017-011	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.11	All approaches are acceptable to the LLFA. Ultimately this is a matter to consider from an urban design perspective, rather than a flood risk perspective.
TP-030-044	Louise Gill	RSPB	Topic Paper 5	T5.11	Yes
TP-034-008	Andrew Leyssens	United Utilities	Topic Paper 5	T5.11	We are supportive of the Council's approach to implement Approach A. Policy DM34 sets a district-wide policy but expectations in South Lancaster should be different, for example stronger controls on the discharge of surface water into the public sewer.
TP-036-070	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.11	Whilst Approach B ensures that the Action Plan is consistent with the Partial Review of the Local Plan, it is likely that the Action Plan will have a longer timeframe and therefore if Approach A provides for higher drainage standard then that should be fo
Question T5.12: What types of sustainable drainage components should be prioritised?					
TP-004-061	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.12	Our clients do not wish to provide comments on what specific elements of SuDS components should be prioritised, however would re-iterate the importance that any approach will need to be flexible.
TP-007-023		Thurnham with Glasson Parish Council	Topic Paper 5	T5.12	An above ground component should be used as this system would be more cost effective to maintain. However, in all systems, the downfall in maintenance will render al these components ineffective. The biggest flood risk problems in present day are as a result of lack of routine maintenance.
TP-009-063	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.12	Multifunctional green space SuDS would be preferred to highly engineered elements as these offer the wide range of benefits and may for example be used as part of a Net Gain Strategy or recreational space provision. It is important to recognise that each site will be different topographically and hydrologically.
TP-017-012	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.12	The LLFA expect above ground, multifunctional SuDS components to be prioritised, in line with national guidance and the LLFA guidance. The Council will need to carefully considrrred how any SuDS components will be identified at this stage and carried forward into the Action Plan given the lack of evidence of site-specific ground conditions in the Action Plan area.
TP-030-045	Louise Gill	RSPB	Topic Paper 5	T5.12	Above ground SuDS will provide better habitats for wildlife.
TP-034-009	Andrew Leyssens	United Utilities	Topic Paper 5	T5.12	We believe sustainable drainage component which is multi-functional in nature and seek to maximise the retention of surface water and are fully integrated. You may want to consider whether there are water re-use opportunities such as grey water recycling which may be more suited to particular types of development. We recommend the approach to drainage and landscaping is intrinsically linked through policy which should include exploring the opportunity presented by tree-lined streets to incorporate bio-retention tree pits within the design of development.
TP-037-019	Alice Watson	Natural England	Topic Paper 5	T5.12	Natural England advises that the use of nature based solutions should always be prioritised. This should be achieved by working with natural processes and green infrastructure. This should support, restore and enhance local habitats / species and habitat connectivity.
TP-036-071	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.12	The Parish Council prefers overground drainage because its performance and maintenance can be monitored more effectively.
Question T5.13: Should the Drainage Strategy set out technical guidance for sustainable drainage components or refer to existing national and United Utilities technical guidance?					
TP-004-062	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.13	Whilst technical guidance could be a helpful too for inclusion within the drainage strategy, we would urge caution when consider its insertion into development plan as technical guidance may be updated, which could lead to a strategy quickly being out of date. That being the case we consider it would be prudent to refer to national guidance generically to ensure the approach remains up-to-date.
TP-007-024		Thurnham with Glasson Parish Council	Topic Paper 5	T5.13	Existing national and United Utilities technical guidance could be used as a basis but a cross-reference to the Drainage Strategy could be included.
TP-009-064	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.13	Peel L&P recommend reference to existing national technical guidance. However, some cross over to design designs for urban realm may be useful.
TP-017-013	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.13	Ample technical guidance already exists and so the LLFA strongly advises signposting to that guidance that the Council deem most appropriate for the Action Plan area. This is preferrable to the Council producing new guidance on the matter.

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TP-024-042	Alban Cassidy	Cassidy & Ashton	Topic Paper 5	T5.13	Yes. Technical guidance that goes into more site-specific detail relevant to the remainder of the proposals for the area and the provision of blue infrastructure should be part of the Drainage Strategy.
TP-030-046	Louise Gill	RSPB	Topic Paper 5	T5.13	Set out technical guidance to strict criteria which ensures maintenance and checks to ensure that they are in place and functioning over time.
TP-034-010	Andrew Leyssens	United Utilities	Topic Paper 5	T5.13	We would welcome the opportunity to discuss this matter with you further. Initial thoughts are that there is extensive guidance available which would be of assistance on this matter.
TP-036-072	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.13	The Parish Council is unaware of any shortcomings in the existing technical guidance provided by United Utilities and other national bodies. Unless there is a significant gap in the guidance that would prejudice delivery of deveopment then it would be better the Action Plan focus its resources elsewhere.
Question T5.14: Do you agree with the council's preferred approach in terms of the setting out sustainable drainage components? If not, please explain your preferred approach and the rationale for your choice.					
TP-004-063	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.14	We agree that Approach B, which sets out the list of drainage components within the drainage strategy as gudiance, but not including them wihtin policy is the best option moving forward.
TP-007-025		Thurnham with Glasson Parish Council	Topic Paper 5	T5.14	We would prefer Approach A and agree that Arcadis that this would ensure consistency in component delivery, design terms and future maintenance and adoptability.
TP-009-065	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.14	Peel L&P would agree with this approach.
TP-017-014	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.14	Approach C is preferred by the LLFA in terms of the technical design of SuDS components as technical design guidance is set out nationally. In terms of the general selection of SuDS components, the principle of multifunctional SuDS being delivered has already been established within the hierarchy set out in Policy DM34.
TP-030-047	Louise Gill	RSPB	Topic Paper 5	T5.14	No, something as vitally required to prevent flooding and futureproof the area must be stipulated clearly the Council policy therefore Approach A is preferred. It is often seen across the Country where SuDS are not undertaken properly and then fail.
TP-034-011	Andrew Leyssens	United Utilities	Topic Paper 5	T5.14	We believe that Approach A is the most appropriate way forward as this is in the best interests of the delivery of development which fully incorporates the principles of multi-functional sustainable drainage and high-quality design.
TP-036-073	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.14	The Parish Council would prefer Approach A to be adopted. The components do not need to be specifically described in the Policy as they are specifiied in technical documents. The Parish Council retains the option of adopting drainage policies within its own neighbourhood plan if the Action Plan adopts the non-policy Approach B.
Question T5.15: Do you have a preferred approach in terms of the management and maintenance of sustainable drainage systems? Please explain your preferred approach and the rationale for your choice.					
TP-004-064	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 5	T5.15	Our clients are amenable to the concept of SuDS approval body (SAB) noting that this would provide a mechanism for the LLFA to approve, adopt and maintain SuDS features to more than one property, but feel that further exploration is required to understand what is involved and what it would mean in terms of technical requirements. Notwithstanding this, Approach B is also a reasonable approach which seeks to maintain the current position and provide developers within flexibility.
TP-007-026		Thurnham with Glasson Parish Council	Topic Paper 5	T5.15	Our preferred approach for the management of SuDS would be one of two. Either United Utilities or the Local Authority. If a national and UU guidance was used in design and construction or the City Council Drainage Strategy used it would be prudent to use the relevant party to maintain. If the maintenance package is given to several parties on short term contracts, negligence and inefficiency could result in the failure of the SuDS feature.
TP-009-066	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 5	T5.15	The current 3-way adoption of SuDS does not always result in the most cost-effective or efficiently designed drainage system, but without the SAB in place then retaining the existing system until such a time that a SAB is implemeneed will need to be the way forward. IT may be that a separate private SAB could be established as part of the Action Plan process.

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TP-017-015	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.15	<p>The LLFA agree with Approach B with any maintenance agreements covered by appropriate legal agreement. Options for this include:</p> <ul style="list-style-type: none">- Adoption by an appropriate water and sewerage company.- Adoption by the local highways authority and/or National Highways.- Where SuDS is not offered for adoption, or only partly adopted, a Section 106 agreement secured in agreement with the local planning authority prior to the grant of any planning permission. <p>The LLFA expect all SuDS to be designed to adoptable standards and subsequently offered for adoption by an appropriate adopting body. The implementation of SuDS Approval Bodies (SABs) may be explored but given the emerging legislation on this matter it cannot be assumed that a SAB will be a viable option.</p>
TP-030-048	Louise Gill	RSPB	Topic Paper 5	T5.15	<p>The SuDS management needs to be maintained to a high standard to ensure flooding does not occur therefore Approach A is preferred to ensure it is managed and maintained appropriately.</p>
TP-034-012	Andrew Leyssens	United Utilities	Topic Paper 5	T5.15	<p>Ultimately the approach to management and maintenance is a matter for the local planning authority and the developer. Our key message is that there should be a clear framework for managing and maintaining all drainage components. We would wish to emphasise that any approach to management and maintenance should include on-site sustainable drainage systems after development takes place. It is our strong preference that management and maintenance of on-site watercourses are not left to fragmented ownerships but rather a co-ordinated management approach.</p>
TP-036-074	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.15	<p>The Parish Council is concerned that there will be a number of developers engaged in the developments within the Action Plan area and that Approach B will result in differing developers adopting different management arrangements, this could result in inconsistencies. The Parish Council therefore prefer Approach A on the basis that SABs will be legally permitted before the Action Plan process is concluded.</p>
Question T5.16: Are there are any other points you wish to raise which have not been captured in responses to other questions in this Topic Paper?					
TP-007-027		Thurnham with Glasson Parish Council	Topic Paper 5	T5.16	<p>Points raised in relation to:</p> <ul style="list-style-type: none">- Glasson and Lower Thurnham and Conder Green appear to have been overlooked in the assessment of flood risk.- There are major flood risks around these areas, and Galgate, which JTP, Lancaster City Council and the Canal and Rivers Trust seem to be unaware of and have a lack of understanding of vulnerability of the area.- We have concerns over the JTP Masterplan and impressions of this being low-key development. The scale of what is being proposed is significant as are the flood risks associated with it. It is not clear that the flood risk for all these projects have been co-ordinated or accurately calculated and accommodated for.- It is not clear why in Policy SG1 that the setting of Lancaster University should be protect but not the important settings of long established local communities, landscape and people there in.
TP-017-016	Philip Wadley	Lancashire County Council (as Lead Local Flood Authority)	Topic Paper 5	T5.16	<p>Further points to raise include:</p> <ul style="list-style-type: none">- The Council should consider the maintenance arrangements for any watercourse in the Action Plan area. Existing watercourses should be protected and, where appropriate, enhanced through new development. The culverting of watercourses should be avoided.- When designing a layout, it is critical to consider the future ownership of and access to any on-site watercourses for maintenance purposes. No development should occur within 8 metres from the bank top of any ordinary watercourse, this includes the construction of structures such as walls and fences.-It will not be acceptable for watercourses to be subject to maintenance regimes associated with fragmented riparian ownership. Applicants must demonstrate that on-site watercourses are subject to clear and co-ordinated management and maintenance regimes.- The Action Plan should include key principles for the management of surface water during the construction phases of development to ensure no increase in flood risk elsewhere and protection of the water quality of receiving watercourses. This is particularly important to establish clear collaboration and cooperation between developers across multiple allocations.- The Action Plan should require developers to provide as-built details of any flood risk assets, including SuDS components and natural flood measures, in an appropriate GIS format for these to be recorded by the relevant flood authorities, particularly the LLFA.

SUMMARY OF RESPONSE TO **TOPIC PAPER 5: WATER MANAGEMENT** - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
TP-034-013	Andrew Leyssens	United Utilities	Topic Paper 5	T5.16	<p>Further issues to raise include:</p> <ul style="list-style-type: none">- The production of an Allocation-wide Strategy and rights to discharge to water bodies, consistent with the Environment Act 2021. Further information is provided on this as part of the full response.- Separate Settlements would present a potential infrastructure challenge and emphasises the importance of considering the opportunity for strategic infrastructure links via the new road infrastructure.- With regard to water efficiency, it is critial that any approach to water management includes this matter.- It is important to note that issues can arise when development is brought forward in close proximity to United Utilities assets, such as waste treatment works, pumping stations and overflows which can result in odour, noise and vibration issues. We would not wish to see development encroach around such assets, for example the waste water treatment works to the west of the Action Plan area.
TP-036-076	Paul Holland	Scotforth Parish Council	Topic Paper 5	T5.16	<p>Discussion in the Topic Paper appears to have address the issue of disposal of surface water with the assumption that foul water systems will only be used as a last resort. The Action Plan drainage strategy needs to be more explicit about if, how and when this may occur and what the impacts would be.</p> <p>The Action Plan needs to address demand for water, in particular policies and design codes that reduce water consumption.</p> <p>It is not clear whether attenuation systems can be linked to water requirements for prospective fruit and crop growing.</p>

SUMMARY OF RESPONSE TO TOPIC PAPER 6: SUSTAINABLE COMMUNITIES - JANUARY 2023

Reference	Name	Organisation (if Applicable)	Topic Paper	Question Number	Summary of Response
GENERAL COMMENTS TO TOPIC PAPER 6					
TP-008-014	Peter Dutton	Gladman Developments	Topic Paper 6	T6.00	<p>In respect of detailed design matters, Gladman believe a combination of applying the National Design Guide and Garden Village Principles are likely to be relevant. On the issue of design coding, Gladman believe that a flexible approach that allows design standardsand approaches to be determined on a case-by-case basis would be appropriate. This could be guided by an over-arching set of principles, but allowing specific design approaches or codes to be tailored to specific schemes.</p> <p>In relation to infrastructure delivery, Gladman would be suggest that discussions on delivery and requirement should extend to individual site promoters, who are likely to play a key role and will shape the role of infrastructure requirements. We also welcome the intention to undertake a viability assessment to support the Action Plan. In respect of housing mix, Gladman note that the Council's SHMA will be a starting point in determining the type of housing that will be delivered, however it is noted that the current SHMA is over 5 years old. We believe the SHMA could provide a starting point, however we believe that a more flexible approach should be tken to allow flexibility with a mix determined on a site by site basis. In addition, we believe the Council's current 30% threshold for affordable housing should be the starting point in the Action Plan preparation, subject to further viability testing.</p> <p>In respect of local centre provision, Gladman believe that their current proposals for Bailrigg Lane include provision of a local centre and would complement further services within the garden village.</p>
TP-010-009	Tim Bettany Simmons	Canal & Rivers Trust	Topic Paper 6	T6.00	<p>Sections 4.1.1 and 4.3.2 set out the approaches to design coding. By making use of the principles contained in the JTP Masterplan then this should ensure that Lancaster Canal is referenced in any coding policy. The waterway has its own particular character and any coding should explicitly take account of this. Our preference would be approach B in terms of design coding.</p> <p>Section 5 deals with the importance of new infrastructure. We welcome Table 5.1 which includes the cycling / walking network. It is however unfortunately that the Trust are not listed at 5.4.2 as we are a key organisation involved in infrastructure delivery and the upgrading of the canal towpath.</p>
Question T6.1: Do you feel that the evidence base identified in Table 3.1 represents a reasonable and proportional basis for the production of the Lancaster South Area Action Plan? If not what gaps in evidence do you think are missing?					
TP-001-017	Marcus Hudson	Lancashire County Council	Topic Paper 6	T6.01	<p>Contrary to the summary at 2.3.2, the South Lancaster Growth Catalyst is not only seeking to address the delivery of a new road and transport infrastructure in South Lancaster, it is also a funding / delivery modal for local infrastructure.</p>
TP-004-065	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.01	<p>Our clients welcome the evidence identified by the Council from the water management perspective as well as recognising that the evidence used for the Local Plan is somewhat dated and requires update as part of the Action Plan process. It is noted that a large part of this evidence base is yet to be prepared and would therefore urge this is published as soon as possible.</p> <p>Our clients are somewhat concerned that the evidence seems to be heavily weighted towards the JTP masterplan area which is not consistent with the 'Broad Location for Growth' identified via Policy SG1. Therefore in the interests of soundness and robustness, evidence needs to be prepared in regard of the whole Action Plan area.</p>
TP-009-067	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 6	T6.01	<p>The list of evidence base documents in Table 4.1 is considered to be comprehensive. In addition the Council could consider commissioning a Heritage Assessment, Utilities Assessment and Soil and Agricultural Quality Report. Clearly further work is necessary to determine an appropriate methodology for calculating developer contributions.</p>
TP-033-010	Graham Lamb	Pegasus Group on behalf of Highgrove Strategic Land Ltd	Topic Paper 6	T6.01	<p>It is important to note the planning status of the JTP Masteprlan which is not a formal Developent Plan or Supplementary Planning Document. It has not been tested at examination giving it limited weight and meaning it will be superseded by the Action Plan. The JTP Masterplan does not cover the entire Action Plan area. Clearly the Masterplan is no a robust starting point for the full Action Plan area.</p> <p>The Masterplan includes broad principles regarding the role of employment but does not make reference to the importance of dedicated employment allocaitons. We believe that opportunities exist for the allocation of employment land within areas outside of the JTP Masterplan which is supported by the direction of Policy SG1.</p>
TP-036-077	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.01	<p>There appears to be no specific evidence base for a strategy for education and healthcare provision, including the development of Lancaster University, renewable energy generation, improvements to the footpath / bridleway network, a railway strategy and a strategy for securing a skilled workforce.</p>
Question T6.2: Do you agree with the garden village principles above in the context of achieving a sustainable place and community? Are there any principles which should be considered more valuable in the context of preparing the Area Action Plan? If so why?					
TP-001-018	Marcus Hudson	Lancashire County Council	Topic Paper 6	T6.02	<p>The County Council support the garden village principles and notes these will need to be respected to comply with the Governments terms of the HIF grant.</p>
TP-003-008		Bailrigg Village Residents Association	Topic Paper 6	T6.02	<p>We agree with the garden village principles set out, we consider points 1, 2 and 5 to be particularly valuable in the creation of a cohesive and sustainable community.</p>

SUMMARY OF RESPONSE TO TOPIC PAPER 6: SUSTAINABLE COMMUNITIES - JANUARY 2023

TP-004-066	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.02	Our clients broadly support the principles which underpin the garden village aspirations noting that, in general terms, they form an appropriatebasis for setting out the aspirations of any medium / large residential development. They could therefore be seen as an appropriate basis for wider development across the entire Action Plan area. That said the Council not lean too heavily on work which has been undertaken as part of garden village and instead should look to create a set of guiding principles for the 'Broad Location of Growth' as a whole.
TP-005-009	Christopher Carroll	Sport England	Topic Paper 6	T6.02	Sport England would welcome the inclusion of the 10 principles of Active Design within the Action Plan and any forthcoming Design Code. These principles would help to promote opportunities for sport and physical activity.
TP-009-068	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 6	T6.02	Our Clients supports and endorses the key design principlpes and can conform that they will be key factors in the design evolution for any development proposals coming forward.
TP-015-033	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 6	T6.02	The garden village principle around cultural, recreational and shopping facilites should be expanded to reference wider social infrastructured needed to support a sustainable garden village, for instance healthcare and education. The garden village principles do not reference the University which should be rectified.
TP-016-019	Warren Hilton	National Highways	Topic Paper 6	T6.02	We broadly support the principles stated, however recommend that reference is made to the updated DfT Policy Circular 01/2022.
TP-024-043	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.02	The garden village principles are agreed but also should have 'land value capture for the benefit of the local community'. This is one of the key principles of the garden village movement inherent to achieving a high quality balanced development where areas whch are ultimately being used for other purposes than housingor commercial uses still contribute to the wider development as a whole. Without this, development will inevitably be dictated by land ownership rather than by design and quality.
TP-036-078	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.02	<p>The garden village principles in paragraph 4.1.1 provide a good combination of what is required for a sustainable new place and community. The Parish Council would like to see the inclusion of education and health facilities in the list of facilities at bullet point 3.</p> <p>Local jobs (bullet point 6) are important for the garden village both in terms of reducing the need to travel but will be the hardest to deliver for the Council because ultimately jobs are provided by commercial enterprises. Nevertheless, the Action Plan must include schemes and incentives for employers to locate their businesses in the garden village.</p>
Question T6.3: Do you agree that issues of design should be considered in the Area Action Plan? How do you feel interested parties should be engaged in relation to design? Should this include the role of workshops to inform matters of design?					
TP-001-019	Marcus Hudson	Lancashire County Council	Topic Paper 6	T6.03	The County Council agree that the issues of design should be considered in the Action Plan but should be counterbalanced against other considerations such as infrastructure delivery priorities and viability.
TP-002-018	Matthew Symons	Hollins Strategic Land	Topic Paper 6	T6.03	HSL agrees that design is key to the success of the garden village and should be considered in the Action Plan. The Plan should provide clear and concise direction on the design of new development which is then demonstrated via parcel-specific masterplans. Masterplans can follow a similar process to strategic sites identified in the Local Plan - an outline planning application could be approved and then followed up by a supplementary masterplan at a reserved matters stage. This would allow the Action Plan to make swifter progress to adoption, without being weighed down by overly-perscriptive policy on design.
TP-003-009		Bailrigg Village Residents Association	Topic Paper 6	T6.03	We agree that issues of design should be considered in the Action Plan since the diverse mix of housing for a diverse community should include supported living which would need early stage design planning. Workshops to inform design matters would be beneficial. Likewise, design for multi-generational living and working from home coul be directed away from open plan interiors.
TP-004-067	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.03	Our clients agree that design should be considered as part of the formulation of the Action Plan but that, as a subjective matter, any design related strategy should be the cumulation of effective, pragmatic and constructive engagement. This should include the local community, neighbourhood groups, design experts and members of the development industry. There may be conflicting aims within these groups and so early engagement will be essential in developing a design strategy. Workshops can present a valuable tool in acheiving meaningful stakeholder engagement but the Council should also consider seminars, leaflet drops and websites.

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TP-009-069	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 6	T6.03	Our Clients agree that the role of design is an important one and should be considered early in the planning process. Peel L&P agree that issues of design should be considered in the Action Plan. However, it is important that any design is inform by a site specific technical understanding. As such, Peel L&P requests that design policies are not overly prescriptive and allow for flexibility. Peel L&P support the use of Design Review Panels to help test good design.
TP-024-044	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.03	Given the requirement now for design to play a greater role in the decision making process, the Action Plan should set the ground rules which then should be taken forward in a design code. All interested parties should be involved including the use of workshops.
TP-030-049	Louise Gill	RSPB	Topic Paper 6	T6.03	Yes, design should be stipulated within the Plan to ensure housing and commercial buildings meet the Council's Climate Emergency. They should include things like solar panels, vehicle chargers, swift boxes and hedgehog holes.
TP-036-079	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.03	The Action Plan must address design issues because it is central to creating a balanced and attractive garden village. The workshops need to have a range of participants who have expertise in design through to local people.
TP-035-023	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.03	Agree that design issues are of primary importance. Workshops on this matter would be useful but unless the thoughts of local people are properly taken into consideration then they would be a waste of time. Workshops would help create an understanding of the specific housing of particular groups with special needs to make sure accommodation is fit for purpose from the outset. Design Review Panels incorporating a range of local people would be a good idea.
Question T6.4: Do you feel that that the high-level principles set out in the JTP Masterplan provide a reasonable starting point for preparing the Area Action Plan for the wider ‘Broad Location for Growth’? Do you feel any of these principles have greater value in terms of the plan-making process? If you do not consider these principles to represent a reasonable starting point what should? Please provide rationale to your response.					
TP-001-020	Marcus Hudson	Lancashire County Council	Topic Paper 6	T6.04	The County Council's view is that the JTP Masterplan is only the starting point as it is a principally landscape-led concept document which is not underpinned by evidence on deliverability or viability.
TP-003-010		Bailrigg Village Residents Association	Topic Paper 6	T6.04	We fell that the JTP Masterplan provides high-level principles.
TP-004-068	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.04	The principles incorporated in the JTP Masterplan are acceptable to an extent but are not considered an appropriate response to the wider characteristics of the whole Action Plan area. Our clients are not supportive of the Council's approach to retrofit the JTP masterplan into the wider area. There is no evidence currently available to support this approach nor is there any information of other options which have been considered by the Council and the justification for why any such options are not favourable. This is not considered to be a sound basis upon which to develop the AAP.
TP-009-070	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 6	T6.04	Our Client strongly agree with the high-level spatial principles set out in the JTP Masterplan and provide an important and reasonable starting point. The masterplan was carefully prepared and produced and extensively consulted on through public and stakeholder engagement. Peel L&P are pleased that the Council is developing beyond the work prepared by JTP.
TP-015-034	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 6	T6.04	The principles provide a reasonable starting point however it is important that Lancaster University is referred to in Principle 1. The Bailrigg Campus is a significant part of South Lancaster and it is critical that its distinct identity is protected.
TP-024-045	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.04	It is acknowledged in Topic Paper 1 that the concept Masterplan carried little weight. As such, and following this consultation the masterplanning process should recommence using the evidence base identified and taking account of this consultation.
TP-030-050	Louise Gill	RSPB	Topic Paper 6	T6.04	Yes and to improve biodiversity and habitat types.
TP-036-080	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.04	<p>The 8 JTP principles relate only to the garden village but provide a reasonable starting point for the Action Plan that focuses upon the creation of wider development. The Parish Council consider these 8 principles should apply across the whole Action Plan area. Whilst the principles are useful, it is considered that the 7 objectives set out in Section 5.3 of Topic Paper 1 are clearer and more comprehensive.</p> <p>Notwithstanding this, neither of these two approaches fully cover the scope of Policy SG1 and the 15 Key Growth Principles, particularly Principles 5, 9, 10, 13 or 15. The Action Plan needs to, as a minimum either comply with Policy SG1 or justify deviations from it.</p> <p>The Parish Council is aware that the University has its own masterplan for its campus but SG1 states that the latter is subordinate to the Action Plan and therefore some review of the University masterplan will need to be part of the Action Plan.</p>

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TP-035-024	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.04	It is difficult to argue with the high-level principles described although we would like to see a fuller explanation of Point 8 which refers to the country hamlets. Further principles could be added around the availability and proximity to education and health facilities. Principles 1, 2, 3, 7 and 8 are of particular interest to the Parish.
Question T6.5: Do you agree that the National Design Guide provides a logical and robust starting point for the creation of well designed places, spaces and buildings? If not why not and what should an alternative starting point be?					
TP-003-011		Bailrigg Village Residents Association	Topic Paper 6	T6.05	We agree that the National Design Guide provides a logical and robust startign point.
TP-004-069	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.05	Our clients consider that the National Design Guide provides a logical and robust starting point in the developmen of the Action Plan. However, this only provides a general approach that is applicable across the Country so it is essential that local characteristics are considered. This should form the basis of the masterplanning exercise for the whole Action Plan area.
TP-009-071	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 6	T6.05	Our Clients agree that the National Design Guide provides a logical and robust starting point for the creation of well-designed places, spaces and buildings, but again it is important to maintain flexibility and consider site-by-site issues and opportunities.
TP-024-046	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.05	The National Design Guide that has been prepared by the Government has to carry some weight, however it is more of a starting point and a more site-specific approach needs to be applied.
TP-030-051	Louise Gill	RSPB	Topic Paper 6	T6.05	The National Design Guide does not go far enough to provide wildlife friendly communities. The RSPB and Barratt Homes have worked together to provide a guide on new house building which should be considered as policy in the Action Plan evolves.
TP-036-081	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.05	The Nation Design Guide is part of National Planning Policy and the Local Plan and Action Plan are required to comply with this. It is therefore a logical starting point for the Action Plan. The Parish Council views the Guide as too vague or unambitious in places and therefore it is only a starting point to which local aspiratios must be added.
TP-035-025	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.05	Agree, characteristic 10 relating to homes and buildings is silent on evironmental impact. Perhaps a note could be added to strengthen specifics about aspiring to Passivhaus- standard homes as put forward in Topic Paper 3.
Question T6.6: Do you agree that this provides the appropriate starting point to address the issues of design within the Action Plan? If not, which approach do you think would be preferable? Do the approaches presented represent all available approaches to the Council in relation to this matter?					
TP-004-070	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.06	<p>There is no evidence currently available to support this approach nor is there any information of other options which have been considered by the Council and the justification for why any such options are not favourable. This is not considered to be a sound basis upon which to develop the AAP. That said, when applied in tandem with the National Design Code this may provide an appropriate framework for the Action Plan area as a whole.</p> <p>Notwithstanding this, our client does support the flexible approach that is indicated in the application of design code requirements. They consider that development within the Action Plan area should not be subject to the rigid appication of the design code, but allowed a degree of flexibility to enable development proposals which respond to site-specific characteristics and other maters such as financial viability.</p>
TP-009-072	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 6	T6.06	Our Clients support Approach B, but only on the basiw that sufficient flexibility is placed with an overarching design code to respond to site-specific constraints and opportunities. Peel L&P is pleased that the role of a design code, however the Council would have to be mindful of striking the right balance in terms of the level of prescription a design code offers. Peel L&P would welcome the opportunity to work more closely with the Council in the preparation of the Design Code and sharing its knowledge as a landowner and developer.
TP-024-047	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.06	We consider the masterplanning process should be started afresh, taking all evidence into account. As such a new approach to design must be taken that is based upon evidence and this consultation process.
TP-030-052	Louise Gill	RSPB	Topic Paper 6	T6.06	A specific design code that must be followed to ensure the most environmentally friendly housing is provided.
TP-036-082	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.06	The Parish Council consider that design codes are critical to the success of the garden village in order to provide consistency and maintain quality standards. Approach C is therefore inappropriate. National guidelines are a low bar and fall short of the standards and vision for the area that Lancaster citizens are expecting therefore Approach A is inadequate. Approach B seeks to develop a locally specific design code which not only achieves local standards but also becomes a blueprint for general deisgn codes that could be used across the district.
TP-035-026	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.06	Preference for Approach A. The production of a well research and well written design code will seek to secure high standards and consistency throughout new development whilst still allowing for change in construction techniques and emerging technologies over time.

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Question T6.7: Do you feel that there are any aspects of infrastructure missing? Do you consider that any elements of the infrastructure referred to in Figure 5.1 which should have a priority in terms of delivering in South Lancaster? Please provide rationale to your response.					
TP-001-021	Marcus Hudson	Lancashire County Council	Topic Paper 6	T6.07	The infrastructure list needs to reflect the priorities established in the funding model for strategic infrastructure and broader commitment made in relation to the South Lancaster Growth Catalyst. The requirements of CIL Regulation 122 summarised in para 5.1.2 should be linked to a clear developer contributions strategy which accommodates early delivery of certain strategic infrastructure and recovery via developer contributions. The analysis at para 5.1.3 needs to be couched in an understanding of why piecemeal development is inappropriate and the need to future proof development beyond the plan period.
TP-004-071	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.07	Our clients would urge the Council to ensure that any infrastructure provision is factored into the viability assessment, noting this is currently unavailable. It is also critical to understand how this infrastructure is funded and delivered. If it is the case that the burden of its delivery is to be placed on the development industry, then viability evidence should be provided.
TP-005-010	Christopher Carroll	Sport England	Topic Paper 6	T6.07	Sport England request that outdoor sports provision and indoor sports provision are included as part of key infrastructure, separate to open space / recreation.
TP-016-020	Warren Hilton	National Highways	Topic Paper 6	T6.07	National Highways is of the view that whilst no aspects of infrastructure are missing, the user hierarchy should place vulnerable road users at the top and prioritise low carbon development and travel.
TP-024-048	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.07	There is no reference to the provision of park and ride, nor safeguard a potential site for a future railway station. Rather than just EV charging there should also be reference to an EV Charging Station which would be set close to the A6 corridor and new link road.
TP-030-053	Louise Gill	RSPB	Topic Paper 6	T6.07	Identify areas solely for wildlife (excluding people and dogs).
TP-036-083	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.07	Figure 5.1 is a high level list of infrastructure elements that appears to be comprehensive enough to cover anything which can be considered catering. There needs to be further consultation on the next levels down of each of the listed items provided by the Action Plan team with guidance on what specific infrastructure expectations really are.
TP-035-027	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.07	Agree with all core aspects. Assumption that pre-school care / education will come in the education provsion although there is no mention of this in para 5.7. Also there is no mention of provision of services for older people, for example extra care / nursing home.
Question T6.8: Do you feel that there are any infrastructure providers that you think are missing from Figure 5.2?					
TP-004-072	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.08	Our clients are generally supportive of infrastructure providers set out in Table 5.2 but feel that it would be important for key stakeholders inside the City Council to be mentioned. Additionally, it is considered that Network Rail be added to the list if infrastructure providers given the proximity of the West Coast Mainline. Our clients also question whether representatives from the development industry should be included (such as the Home Builders Federation), particularly in the context of the financial burdens of delivering infrastructure which may rest with them.
TP-005-011	Christopher Carroll	Sport England	Topic Paper 6	T6.08	Sport England consider it would be beneficial if Active Lancashire an the relevant governing bodies for sport were included to help protect, assess and deliver the necessary sports infrastructure with local community.
TP-016-021	Warren Hilton	National Highways	Topic Paper 6	T6.08	It is recommended that the following groups are consulted - Sustrans, the Ramblers Association, Local Walking and Cycling Groups, Equestrians and Public Transport Operators.
TP-024-049	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.08	The list should include Network Rail and EV charging station providers.
TP-036-084	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.08	The list of infrastructure providers excludes Network Rail, Bus Infrastructure Providers, British Waterways and Country Landowners Association.
TP-035-028	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.08	The key national providers are included but would it not be useful to identify more local providers of key infrastructure, such as dental care providers or Lancashire County Council Public Health team? There is also no representation from the voluntary sector, a lot of recreation is provided by the voluntary sector which might require facilities from which to operate. Finally, shouldn't food providers / supermarkets be included as infrastructure providers?
Question T6.9: Do you have any further views on the Council's approach to the delivery of infrastructure through the Area Action Plan process?					
TP-001-022	Marcus Hudson	Lancashire County Council	Topic Paper 6	T6.09	The Action Plan should set out a clear approach to developer contributions which ensures that they are collected on a fair, proportionate and consistent basis from all benefitting development, irrespective of when that development comes forward. For the avoidance of doubt, this approach needs to be sufficiently flexible to facilities the recovery of forward funded elements of strategic infrastructure. The approach to infrastructure priorities need to have regard to the Council's role in the South Lancaster Growth Catalyst.

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TP-002-019	Matthew Symons	Hollins Strategic Land	Topic Paper 6	T6.09	Given its involvement with sites elsewhere, HSL are well aware of the delays being caused by infrastructure planning. It is therefore vital that all infrastructure providers fully engage in the with the Action Plan process. All healthcare, education, community facilities, POS, transport, utility requirements should be set out in detail within the Action Plan. That would enable the Council to approve applications for development within the garden village immediately after the adoption of the Action Plan.
TP-002-020	Matthew Symons	Hollins Strategic Land	Topic Paper 6	T6.09	HSL recognises that community stewardship of land is a garden village principle which must be fully considered in the Action Plan. HSL considers it is possible that a hybrid approach to management could be taken into account - for example areas of POS within a specific development parcel could be managed by a private management company whereas the larger swathes of amenity space could be managed by a charitable trust. The Action Plan should provide direction on the management of public spaces to enable planning approvals to follow quickly after the adoption of the plan.
TP-004-073	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.09	Our clients have no other views on this other than to state that the City Council should not be overly reliant on the JTP Masterplan in its assessment of infrastructure requirements and that any such infrastructure should be accounted for in the viability assessment.
TP-005-012	Christopher Carroll	Sport England	Topic Paper 6	T6.09	The Council should use Sport Englands Sport Facility Calaculator and Playing Pitch Calculator as a guide to what indoor and outdoor sport will be required as a result of development. Sport England do not consider local standards as appropriate for outdoor sports between they do not and cannot take account of sports catchment areas.
TP-009-073	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 6	T6.09	Our Clients are pleased that the Council have appointed consultant to prepare a robust viability asessment of the infrastructure reuirements required in the Area Action Plan. Peel L&P would welcome early dialogue with the viability consultants to ensure meaningul discussion.
TP-015-035	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 6	T6.09	If the Action Plan identifies opportunites for residential development which is not part of the garden village then all the considerations identified in Topic Paper 6 should be applicable to these areas as well as the garden village.
TP-030-054	Louise Gill	RSPB	Topic Paper 6	T6.09	Thoughts have gone into school provisionbut not pre-schools. The area is seriously lacking in spaces available for pre-school and the new housing will only mke this matter worse so should be planned into the development. The environmental features should be managed appropriately and some more sensitive environments will require the exclusion of people and dogs.
TP-036-085	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.09	<p>Section 5.5 is effectively a warning that some of the expectations around new development may be dashedby a viability test where the need to reward developers with a prescribed level of profit takes precedence over the infrastructure prescribed. It is vital that there is an early stage high-level viability assessment which is published for residents can be reassured or can reconsider their support for a viability-dilluted garden village. If the Council decide to descope infrastructure in order to fulfill the viability tests, then early disclosure will be essential.</p> <p>It is anticipated that the scope and cost infrastructure will evolve as the Action Plan progresses and therefore there will need to be a number of iterations of the viability test. In addition, the Council will have to ensure developers remain committed to the project after each test. If not then the Parish Council would like to see the creation of a publicly owned Lancaster Development Corporation (with CPO Powers) who can undertake the development and plough any profits back into the district.</p> <p>The Parish Council endorses para 5.7.4 regarding education provision as a key component of the Action Plan. It is therefore concerning that the Gladman application does not appear to have any contributions towards education provision.</p>
TP-035-029	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.09	<p>Whilst consultation with NHS England and local medical practice is an absolute must, possibly overview service provision with the support of Lancashire County Council Public Health team might be prudent. There will be a need for new health facilities, no investigation is needd other than to understand what those nees are so the statement should be a more positive commentment to the health of the residents. The risk will otherwise be financial pressures that drive the delivery rather than a vision of what is required.</p> <p>With regard to education provision, how the City Council know that the two proposed primary schools will be sufficient. How is projected provision calculated?</p> <p>Given this is an opportunity to shape a new community, there is possibly a moral imperative that the plan is visionary and adds to the lives of the people who are resident there. It would shameful if plan became a way of addressing current issues because of financial imperatives rather than using it as a way to plan properly.</p>

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Question T6.10: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches to the management of spaces and places which you think are missing? Please provide further detail on what you believe those approaches to be.					
TP-001-023	Marcus Hudson	Lancashire County Council	Topic Paper 6	T6.10	In response to para 5.7.2, the County Council (in capacity as education authority) is reviewing its methodology for calculating and collecting education contributions and its finalised approach needs to be integrated with the wider developer contributions and implementation strategies. The County Council are review the proposals for school locations as identified by the JTP Masterplan and reserves its position to respond in due course.
TP-004-074	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.10	Our clients do not consider there to be sufficient information at this time to provide an informed position on what the best approach would be to the management of places and spaces. It is important that any future approach should be flexible and offer a degree of choice for developers and the Council alike. Our clients would also comment that however the Council seek to use management companies would need pt provide substantive evidence to justify any approach where the use of management companies were not be deemed acceptable.
TP-005-013	Christopher Carroll	Sport England	Topic Paper 6	T6.10	It is unclear at this stage how proposed sports facilities will be maintained and managed. It is strongly advised that the necessary national governing bodies are approached regarding this matter.
TP-030-055	Louise Gill	RSPB	Topic Paper 6	T6.10	Approaches B or C are favourable. The sole aim of a private company is to make money which means that the places and spaces won't have all the money put back into them unlike a charity or local Council.
TP-036-086	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.10	The Parish Council does not support Approach A because of its lack of accountability and the potential that management overheads and profit margins will not stay within the local community. The preferred approach to start with is Approach C with the Council taking responsibility in the early stages of development with Approach B coming with time as the new community grows and establishes itself.
TP-035-030	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.10	On the basis of the arguments put forward in this paper, our preference would be Approach B. As the Topic Paper suggests, it is likely that in the initial years, before a sizeable community is established, that some form of City Council support and governance will be required.
Question T6.11: Which of the ambitions of the JTP Masterplan do you consider to be the most relevant to the preparation of the Area Action Plan? What would that opportunities and challenges to delivering these ambitions? Please explain your rationale to your response.					
TP-001-024	Marcus Hudson	Lancashire County Council	Topic Paper 6	T6.11	The JTP Masterplan is a design concept document that needs to be reviewed against evidence on viability and supporting infrastructure.
TP-004-075	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.11	Our clients consider the principles of the economic prosperity detailed in the JTP Masterplan are equally important for the Action Plan area as a whole. It is considered more prudent to align the principles of economic prosperity with the principles set out in Policy SG1 of the Local Plan.
TP-015-036	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 6	T6.11	<p>The University strongly supports the following ambitions:</p> <ul style="list-style-type: none">- Be a thriving place of work, not a base from which to commute.- Create a local and diverse employment offer, making work more convenient and peoples lives easier.- Offer diverse economic opportunities that increase productivity.- Create hubs where people can come together and work, share knowledge and skills. <p>Connections to the University Campus and Innovation Campus are key to the economic growth in South Lancaster and so is the role of the University and its future growth / expansion should be acknowledged and referenced throughout the Action Plan.</p>
TP-024-050	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.11	In respect to employment in general, we believe development should be genuinely mixed use and provision should be made for other forms of employment including office, high tech and logistics given the proximity to the University and M6.
TP-036-087	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.11	All the JTP employment principles are vital to sucessfully create high quality employment to support all of the new households in the Action Plan area. Some of these principles will however be principally led by employers whikst others will be in the remit of the City Council. Therefore a collaborative approach is required with all key stakeholders in the process.

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TP-035-031	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.11	<p>A key ambition should be that the garden village should be a thriving place to work, not to commute from and this should be expressed clearer within the Topic Paper. We think it is highly unlikely that development here will create sufficient employment opportunity to discourage commuting. It is inevitable that a significant proportion of homeowners will commute will commute to either Lancaster City Centre or, more likely outside of the district. The building of a new motorway junction seems to support commuting opportunities.</p> <p>As there may be fewer opportunities to work in the garden village, investigating how new development can support the working population of Lancaster should be explored, ensuring new housing meets their needs. Housing needs to be available for all sections of the communty and should be adaptable for their entire lifetime.</p> <p>Provison should also be made for homeworking opportunities and hot-desking within new development.</p>
Question T6.12: Do you consider the economic sectors describe represent reasonable and appropriate types of employment for South Lancaster. If not why not? Please provide rationale to your response.					
TP-004-076	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.12	<p>Our clients focus on the delier of new homes and so do not have any substantive comments to make on this question at the present time. Notwithstanding this, the sectors suggested appear to be wide ranging and would appear to be appropriate targets for South Lancaster (albeit capacity would need to be considered). The Action Plan should consider a number of options for how these sectors would be targetted which is supported by an appropriate evidence base.</p>
TP-015-037	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 6	T6.12	<p>The sectors identified should also include:</p> <ul style="list-style-type: none">- Heath (in recognition of the Health Innovation Campus).- Education (in recognition of the University Campus).- Professional, Financial and Business Services.
TP-024-051	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.12	<p>The sectors identified are generally appropriate.</p>
TP-030-056	Louise Gill	RSPB	Topic Paper 6	T6.12	<p>Advanced manufacturing / transport and storage are less favourableas large warehouse and industrial buildings will not fit in with the overall designs of the wider area.</p>
TP-033-011	Graham Lamb	Pegasus Group on behalf of Highgrove Strategic Land Ltd	Topic Paper 6	T6.12	<p>The Topic Paper considers a range of employment sectors over the lifetime of the Action Plan including advanced manufacturing, transport / storage and professional / private services. We welcome the broad range of employment sectors identified which will require a flexible approach to meet the needs of South Lancaster moving forward. A range of B2 and B8 uses should be considered suitable - the range of employment sites in the adopted Local Plan are considered unsuitable for delivering a full range of modern business needs. The allocation of sites in the Action Plan area offers the opportunity to provide deliverable employment sites to meet future employment needs in the District.</p>
TP-036-088	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.12	<p>The list of economic sectors in para 7.4.2 are all reasonable for South Lancaster. It is surprising that agriculture, recreation and environmental management are not listed.</p>
TP-035-032	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.12	<p>There economic sectors listed are reasonable. There is an issue with the data. The DLP Strategy Report makes use of data from Summer 2022 and was produced before the latest economic downturn. This data and its implications should be re-investigated.</p>
Question T6.13: Do you have any preferred approach for identifying employment land from those described? Please give rationale for your answer. Are there any approaches to the delivery of employment which you think are missing? Please provide further detail on what you believe those approaches to be.					
TP-002-021	Matthew Symons	Hollins Strategic Land	Topic Paper 6	T6.13	<p>HSL agrees that the Council has an opporutnity to deliver employment in the right form via the Action Plan. Furthermore, HSL consider there to be potential for employment development to be delivered as part of their land interests. The garden village is likely to offer an attractive environemnt for office-type development.</p>
TP-015-038	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 6	T6.13	<p>The University would like to ensure the Action Plan distinguishes between employment develoment and University related growth / expansion. The Action Plan would benefit from identifying areas which should be promoted for growth of the University estate, including areas to the east of the M6 and to the west and south-east of the Bailrigg Campus.</p> <p>This would ensure that alongside employment development and housing delivery, the Action Plan delivers on the requirements of Policy SG1 in relation to University related expansion.</p>
TP-024-052	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.13	<p>Approach B is supported. For the deveopment to be truly mixed use and therefore sustainable it is essential to bring employment uses through early in the process and this is best achieved by identifying land for such uses in appropriate locations.</p>

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TP-030-057	Louise Gill	RSPB	Topic Paper 6	T6.13	Approach C is preferred. Where it is not identified in overall terms it could lead to inappropriate buildings / businesses for the area.
TP-036-089	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.13	There is a clear risk with Approaches A and B that the land for employment will be squeezed out by more profitable housing development. This will result in either employment opportunities being lost or in the future there will be pressure to give up greenspace for employment. Therefore the Parish Council will only support Approach C which ensure that long term land allocations for employment will be made in the Action Plan.
TP-035-033	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.13	Probably Approach B or C, however the data needs to be reviewed in light of recent economic events.
Question T6.14: Do you consider the indicative housing mix within the Local Plan to be a correct and appropriate starting point for understanding the housing mix required within the ‘Broad Location for Growth’? If not, why not. Please provide rationale for your answer.					
TP-002-022	Matthew Symons	Hollins Strategic Land	Topic Paper 6	T6.14	HSL agree that this is an appropriate starting point provided it is supported by a Housing Strategy.
TP-004-077	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.14	The Local Plan is considered an appropriate starting point for understanding the required housing mix for the Action Plan area. That said, it is based on the SHMA which dates back to 2018 and the JTP Masterplan which has no planning status. Whilst the Local Plan and SHMA should provide a starting point, our clients consider that it would be prudent to prepare an update to the SHMA to ensure that the Action Plan delivers the homes that are needed.
TP-009-074	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 6	T6.14	Our Clients consider the housing mix in the Local Plan represents a snap-shot in time. Over time the identified needs for a dwelling type and size is likely to change. This is particularly the case in light of the COVID-19 Pandemic. It is important that the Council considers the viability of development when considering the desirable mix for development. An overly prescriptive mix could impact on viability, deter investors and the Council' ability to meet its overall needs for housing. Allowing a flexible housing mix will encourage the delivery of housing which responds to changing needs.
TP-015-039	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 6	T6.14	The University would reiterate that the housing needs of South Lancaster should be met in perpetuity through restrictions, such as Article 4 directions, to ensure that the house types required to create sustainable communities are retained as such. Furthermore, the University seeks recognition within the Action Plan that student accommodation is suitable for delivery in South Lancaster. The Action Plan should recognise the delivery of student accommodation and the strong preference for this to be located primarily at Bailrigg Campus and other appropriate locations within the wider University estate.
TP-036-090	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.14	The Parish Council are not in a position to comment on whether the SHMA assessment of housing mix is appropriate. Intuitively, the mix looks reasonable but the evidence of whether the number of older / mobility imparied residents and their needs can be accommodated need to be provided though the Action Plan process.
TP-035-034	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.14	Figure 8.1 is trying to address two issues and is therefore unclear, in terms of housing mix only the first two columns are applicable. The affordable housing column should be moved into a new table. Looking at the percentage mix, should the figure for flats / apartments not be higher than 10%, particular as 2-bedroom houses are only 20%? In addition, specific types of housing which will be important for a sustainable community are missing, specifically supported accommodation for the elderly and those with additional health needs.
Question T6.15: Do you believe that the Local Plan threshold of 30% represents a reasonable starting point for understanding the affordable housing requirements within the ‘Broad Location for Growth’. Given the context for development in this area do you think the affordable housing requirements should be higher or lower than the Local Plan position? Please explain your rationale for your answer.					
TP-001-025	Marcus Hudson	Lancashire County Council	Topic Paper 6	T6.15	The Local Plan threshold for affordable housing needs to be viability tested against all supporting infrastructure needs as part of the Action Plan preparation process. This should be a confirmed part of the viability assessment brief with external consultants.
TP-002-023	Matthew Symons	Hollins Strategic Land	Topic Paper 6	T6.15	HSL are aware of the signifciant need for affordable housing in Lancaster, however viability will be key to the delivery of 30% affordable housing. Development at the garden village will require significant infrastructure and it is expected that developers will be aksed to make significant contributions via S106 agreements. The expected contributions must be consulted upon, alongside a detailed Viability Assessment.
TP-004-078	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.15	Our clients welcome the provision of affordable housing within the Action Plan area. They would suggest that any policy within the Plan should be sufficiently flexible as to be able to react to market conditions or site-specific viability considerations that mean sometimes it may not be possible to deliver 30% affordable housing.

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TP-009-075	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 6	T6.15	Our Clients accept that 30% affordable housing is a suitable starting point for development via the Action Plan. Peel L&P are pleased that the Council recognises the wide range of environmental and placemaking requirements plus infrastructure provision. Action Plan policy requirements for the quantum and tenure of affordable housing must be considered as part of the viability assessment. Site-by-site flexibility will be crucially important.
TP-036-091	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.15	The Action Plan is the very detailed delivery of the Local Plan and therefore 30% affordable homes should be the starting point. Given the viability testing for infrastructure it is likely there will be pressure to reduce the proportion of affordable homes but the Parish Council would not support any approach which goes below 20%.
TP-035-035	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.15	30% is a good starting point, the question is whether developers will find a way of getting round building affordable homes due to building conditions, profit margins etc.
Question T6.16: Do you feel that the types of housing which are set out in this Section represent all types of housing which should be explored within the ‘Broad Location for Growth’? Are there any types of housing which are missing from this section which should be considered?					
TP-003-012		Bailrigg Village Residents Association	Topic Paper 6	T6.16	We consider the housing mix should reflect a greater diversity and therefore should include more bungalows and support living housing. Co-housing for over 55s and multi-generational housing reflecting the social care crisis should also be included. Given the proximity to the university, it would be necessary to ensure that housing did not get bought up by buy-to-let landlords for student tenants. There must be some sort of mechanism in place to ensure the garden village does not become an extension of the university campus as a student village.
TP-009-076	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 6	T6.16	Our Clients support the delivery of a mix of housing types within the Action Plan area to help meet local housing need and to help satisfy future housing aspirations.
TP-036-092	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.16	The types of housing described are reasonable. It is noted that student accommodation is excluded and this position is supported by the Parish Council on the basis that such accommodation should be either on the main campus or in the city centre. Mechanisms should also be established to regulate Houses of Multiple Occupation (HMOs) often populated by students.
TP-035-036	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.16	Broadly agree. Provision for care of the elderly and those with particular needs should be an important feature of any development of this scale. Community-led housing is also encouraged.
Question T6.17: Do you agree with the inclusion of a new Local Centre as part of development within the ‘Broad Location for Growth’? What do you consider to be the most important elements of any local centre?					
TP-002-024	Matthew Symons	Hollins Strategic Land	Topic Paper 6	T6.17	HSL agree that a local centre will be required as part of the garden village, however it also recognises the potential for a smaller centre to be provided west of Lancaster Canal. The Topic Paper refers to the potential triggers for the delivery of a new local centre, including the creation of new road infrastructure and footfall. It is considered that a small local centre on HSL land interests could provide a complimentary centre to the main local centre which will meet needs in the early phases of development.
TP-003-013		Bailrigg Village Residents Association	Topic Paper 6	T6.17	A local centre is integral to the success of the community with healthcare facilities and a community hall and meeting space being important elements.
TP-004-079	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.17	Whilst there is no national definition for a local centre, they are generally considered to include a range of small shops which are local in nature including a small supermarket, newsagent, post office, pharmacy and other services such as a hot food takeaway and laundrette. Local centres should be readily accessible to the population they serve and should be centrally located. That is not to say any centre, by default, be located in the garden village. This should be reflective of the patterns of growth in the locality.
TP-009-077	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 6	T6.17	Our Clients agree that the main local centre should be located centrally in the Garden Village development and that it should meet the needs of local residents without competing with Lancaster City Centre. This should include local retail provision as well as community provision. This should not preclude the development of smaller community facilities or commercial activities elsewhere, as part of ensuring sustainable development is achieved across the Action Plan Areas. High quality pedestrian, cycle and public transport links will also be crucial.
TP-015-040	Helen Clarkson	CBRE on behalf of Lancaster University	Topic Paper 6	T6.17	The University agrees that local centre is required as part of the Action Plan and that Approach B is the most appropriate way to deliver this. There may be additional services / small scale retail provision outside the local centre if the Action Plan considers urban extensions to the Lancaster urban area. The local centre should not compete with existing facilities of designated centres and the University Campus. The local centre should include healthcare, education, open space and retail provision.

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TP-024-053	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.17	There is scope for a more accessible local centre which may be closer or on the new A6 / link road corridor which means that it will be also accessible for those travelling along both routes therefore increasing footfall and viability. This could be supplemented by a further centre in later phases of development if appropriate.
TP-030-058	Louise Gill	RSPB	Topic Paper 6	T6.17	Yes, this is needed to reduce travel requirements in vehicles. Places to buy essentials will be useful.
TP-036-093	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.17	A village without a local centre is not a village and is merely a housing estate. The success of the garden village depends upon having a viable Local Centre that provides for day-to-day local needs but does not complete with the retail offer of the City Centre. The local centre should be linked to the primary school and be a mix of small convenience stores, cafes, commercial services and community facilities.
TP-035-037	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.17	There must be a local centre providing shops and services This is particularly important for those with young families, people with disabilities and older people who may not be able to access services outside the village. Typical services should include health centre, post office (not just a post box), newsagent, grocery shop, bakery, greengrocer, butcher, cash machine, barber / hairdresser, DIY shop.
Question T6.18: Do you feel that the provision of a new foodstore is an important element of the development proposed in South Lancaster?					
TP-003-014		Bailrigg Village Residents Association	Topic Paper 6	T6.18	A small convenience store would enhance the community hub.
TP-004-080	Dan Mitchell	Barton Wilmore on behalf of Storey Homes	Topic Paper 6	T6.18	Any such provision of a new foodstore within the Action Plan area should be underpinned by appropriate retail evidence, with the current evidence not up-to-date. If evidence demonstrates a need, then the broad location for growth could represent a suitable location for this although it should be considered as part of a wider masterplanning process for the area as a whole. It would also be considered against the wider requirements of the Local Plan.
TP-009-078	Dan Jackson	WSP on behalf of Peel L&P Investments (North) Ltd	Topic Paper 6	T6.18	<p>Our Clients support Approach B, in that the Action Plan should include provision for a local centre which provides a greater diversity of uses which extends beyond simply retail. Peel L&P agree that the main local centre should be located centrally in the Garden Village development and that it should meet the needs of local residents without competing with Lancaster City Centre. This should include local retail provision as well as community provision.</p> <p>This should not preclude the development of smaller community facilities or commercial activities elsewhere, as part of ensuring sustainable development is achieved across the Action Plan Areas.</p>
TP-024-054	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.18	Yes. A foodstore would be an important part of a new community to avoid the need for longer journeys for main food shops. However, this should be sited in an accessible location and should be available to passing trade and not just local residents making the A6 / new link road corridor the most suitable location.
TP-030-059	Louise Gill	RSPB	Topic Paper 6	T6.18	Currently there are limited foodstore options in South Lancaster. This requires residents to travel into Lancaster to undertake normal food shopping. Therefore a foodstore is a necessity to reduce travel.
TP-036-094	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.18	A garden village of 2,500 people would sustain a number of small and medium sized foodstores. A large supermarket could swamp the local centre, restrict choice and draw customers (and their cars away) from the existing supermarkets and therefore would not be welcome in the local centre. The demand for a large supermarket cannot be ignored and therefore the potential location of a facility at Lawson's Bridge is preferred.
TP-035-038	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.18	It would be a shame if a large supermarket took business away from the community-led local centre. Any large foodstore would need to complement, rather than compete against, local stores.
Question T6.19: Do you have any preferred approach from those described? Please give rationale for your answer. Are there any approaches to local centre provision which you think are missing? Please provide further detail on what you believe those approaches to be.					
TP-003-015		Bailrigg Village Residents Association	Topic Paper 6	T6.19	A small coffee shop could provide an additional meeting space for the community.
TP-024-055	Alban Cassidy	Cassidy & Ashton	Topic Paper 6	T6.19	Approach C is preferred and broadly accords with the comments we have made elsewhere in respect of serving wider need and being accessible both to new development and those using the A6 / new link road corridor to maximise demand and viability.
TP-030-060	Louise Gill	RSPB	Topic Paper 6	T6.19	Approach B is preferable. The area needs to accommodate all local needs including doctors to ensure a reduction in travel needs.
TP-036-095	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.19	A key objective of the garden village is to provide facilities that reduce the use of cars and therefore its local centre ought to be sufficient for its own residents but not attract traffic from the wider catchment area. Therefore the Parish Council support Approach B.

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TP-035-039	Derek Whiteway	Aldcliffe-with-Stodday Parish Council	Topic Paper 6	T6.19	Approach B seems the most sensible. Approach C would lead to even greater traffic flows and environmental impacts.
Question T6.20: Are there any other points you wish to raise which have not been capture in responses to other questions in this Topic Paper?					
TP-003-016		Bailrigg Village Residents Association	Topic Paper 6	T6.20	The Residents Association want to emphasise its commitment to the Council's stated expectation that 'all development contained within the designation of the Broad Location for Growth, including the garden village, should contribute to infrastructure requirements in a fair and equal manner. The Council will not permit piecemeal development in this area which does not seek to address matters of strategic infrastructure in accordance with the expectations of Policy SG1 of the SPLA DPD'.
TP-036-096	Paul Holland	Scotforth Parish Council	Topic Paper 6	T6.20	<p>The Parish Council would make the following further points:</p> <ul style="list-style-type: none">- The name of the village 'Bailrigg Garden Village' is inaccurate and misleading because the location of the garden villgage is not in Bailrigg but will encompass Lower Burrow, Burrow Heights and the Canal. Bailrigg Village already exists so its use for this proposed settlement is both confusing and disrespectful. There needs to be public consultation on naming the garden village.- The garden village will fall across 4 existing Parish Boundaries. It would make sense for the whole garden village to reside in one parish. Such a governance review is technically a separate exercise but should be undertaken in conjunction with the Action Plan.- Consideration needs to be given to the relationship between the Action Plan and the Scotforth Neighbourhood Plan which has just begun its preparation. The Action Plan needs to provide clarity on the relative weight of its content and the implications between the two documents.- School provision in South Lancaster needs to be clarified at both Primary and Secondary level to ensure there are sufficient places locally and reduce the implications of excessive traffic movements on the local road network.