

Scotforth Rural Neighbourhood Development Plan

Lancaster City Council Response to Levelling-up and Regeneration Act Changes Consultation

August 2026

1. INTRODUCTION

- 1.1 Lancaster City Council (Council) welcomed the submission of the Scotforth Rural Neighbourhood Development Plan (referred to as 'the NDP' from this point forward) back in August 2025, which was then published for consultation under Regulation 16, and subsequently submitted for examination, alongside all the comments received to that consultation, on 15th January 2025. The examination was undertaken by an independent examiner. The council have been fully supportive of the Scotforth Rural Parish Council's (the Parish) decision to prepare a neighbourhood plan for their area and have provided support to aid the group's preparation of the plan and throughout the examination process.
- 1.2 The final Examiner's report was received on 15th April 2026. The Examiner concluded that, subject to a series of modifications being made, the NDP could proceed to referendum.
- 1.3 During this time, on 25th March 2026, the Levelling Up and Regeneration Act made a number of changes which affect the legal requirements that Neighbourhood Plans must address and with immediate effect. The changes that have been brought in introduce two new legal requirements and a new basic condition.
- 1.4 This document forms the Council's response to the consultation on the Basic Conditions Statement Addendum which addresses the changes made by the Levelling Up and Regeneration Act in March 2026 and is intended to support the Parish Council and the Independent examiner.

2. NEW LEGAL REQUIREMENTS

- 2.1 When a qualifying body, in this case Scotforth Parish Council, submits a neighbourhood plan, the local authority is required to consider whether the legal process has been followed, whether the submission meets the requirements, to publicise the neighbourhood plan and arrange for independent examination.
- 2.2 The Scotforth Rural Neighbourhood Plan Area was designated on 27th January 2023 following the consultation process which was required at the time. The Parish Council has followed the required processes including pre-submission Regulation 14 consultation and publicity between 17th February to 31st March 2025. The NDP was amended where required following this consultation and submitted to the Council under Regulation 15 on 4th August 2025, and was subject to a 6-week consultation which commenced on 2nd October and concluded on 17th November 2025. The NDP and supporting documents were then submitted for examination in January 2026.

2.3 The local authority is not required to assess whether the neighbourhood plan meets the basic conditions. That is the role of the independent examination. It is however expected to provide advice and support to help produce a plan that does meet the requirements. The basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) at the time of submission were as follows:

- (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.
- (b) The making of the neighbourhood plan contributes to the achievement of sustainable development.
- (c) The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- (d) The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.
- (e) The prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal. The prescribed condition in relation to Plans is:
 - The making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017 (Habitat Regulation Assessment) in relation to the examination of neighbourhood development plans.

New Basic Conditions

2.4 However, on 25th March 2026, Section 99(3) of the LURA 2023 modified the Basic Conditions set out in paragraph 11(2) of Schedule A2 of the PCPA 2004 with the following amendments:

- a) For paragraph (c) substitute –

“(ca) the making of the plan would not result in the development plan for the area of the authority proposing that less housing is provided by means of development taking place in that area than if the draft plan were not to be made,”;
- b) After paragraph (d) (but before the “and” at the end of that paragraph) insert –

“(da) any requirements imposed in relation to the plan by or under Part 6 of the Levelling-up and Regeneration Act 2023 (environmental outcomes reports) have been complied with,”.

2.5 Consequently, rather than the Neighbourhood Plan being required to be in conformity with the strategic policies contained within the Local Plan (c), the Neighbourhood Plan is now required to not result in proposing less housing being provided by means of development taking place, than if the Neighbourhood Plan were not in place (ca). Given that a number of strategic policies address the matter of housing development; policy SP3 (Development Strategy for Lancaster District), policy SP6 (The Delivery of New Homes) and policy SG1 (Lancaster South Broad Location for Growth (including Bailrigg Garden Village)), it is considered that the Neighbourhood Plan remains in conformity with the basic condition (ca) set out in paragraph 2.4 above. This is explained in more detail in paragraphs 2.6 to 2.8 below.

2.6 The submitted Scotforth Rural NDP contains two policies relating to development within the Neighbourhood Plan Area; Policy SR1 and Policy SR2. Policy SR1 identifies an Area of Separation around Bailrigg Village, stating that ‘development proposals will not be supported where they would

impact on the openness and visual amenity of the Area of Separation, or where they would lead to coalescence between Bailrigg Village and the City of Lancaster to the north or Bailrigg Village and Lancaster University Campus to the south'. This is in accordance with the direction of policy SG1 in the Local Plan which sets out a series of principles for development within this area, including 'the creation of sufficient areas of high quality open spaces to provide a distinct sense of place and deliver a network of green corridors and walking and cycling routes across the South Lancaster area to the benefit of the local environment and residents. The delivery of such spaces and routes should make for distinct area of separation between the new development and the urban edge of Lancaster, Bailrigg Village and Galgate and give potential to bring forward a new country park'. Also, 'safeguarding Lancaster University's Bailrigg Campus, by ensuring that development in South Lancaster and for the Bailrigg Garden Village is well planned and does not have an adverse impact on the University Campus and its setting'. Policy SR1 within the NDP continues 'Within the Area of Separation proposals which maintain and enhance the general open and green character will be supported as part of the development schemes'. In accordance with the principles laid out in the Local Plan addressing housing development within this area. Whilst the opportunity for strategic housing growth has been identified through the Local Plan for the area covered by this NDP, this is within the context of protecting the sense of place, which the Examiner has picked up on in the Examiner's Report.

- 2.7 Policy SR1 within the NDP also identifies a Development Boundary for Bailrigg Garden Village. It is noted that the Council have previously recommended this be a separate policy, and the Examiner has recommended this also within the Examiner's Report. The policy states that 'development will be supported where it demonstrates that it meets evidenced local housing needs of Scotforth Parish, and is proportionate in scale and character of the village'. Policy SP2 of the Local Plan sets out the settlement hierarchy for the district. 'The Council will support proposals for development in the settlements...provided that they are of a nature and scale that is proportionate to the role and function of that settlement or where they have been specifically identified in this plan to meet the strategic growth needs of the district'. The village of Bailrigg is classified as a 'Rural Village' and policy SP2 is clear that 'these settlements will accommodate development that meets evidenced local needs only'. Therefore, the NDP is considered to be in conformity with the new basic condition (ca).
- 2.8 Policy SR2 within the NDP addresses development in the Burrow Heights and Lower Burrow Local Character Area (on the western side of the A6). Stating that development proposals 'which clearly demonstrate they meet evidenced local housing needs of Scotforth Parish will be supported where they comprise small scale infill and rounding off (typically ones and twos) and respect the setting and form of existing traditional buildings'. Again, this area, in the context of policy SP2 within the Local Plan, would only be required to 'accommodate development that meets evidenced local needs only'. The Examiner has suggested some slight wording alterations to ensure the policy is not unduly restrictive and allows sufficient flexibility to the approach towards development in this area. Policy SR2 is therefore considered to be in conformity with the new basic condition (ca).
- 2.9 With regards to the new basic condition (da), in relation to environmental outcomes reports, whilst this basic condition has commenced, until such time as a completed framework for the implementation of Environmental Assessment Reports is in place, compliance with this basic condition cannot be assessed. However the plan complies with all Environmental Outcomes Reports obligations currently in force.

New Legal Compliance Requirements

- 2.10 Section 98(3) of the Levelling Up and Regeneration Act (LURA) 2023 modifies Section 38B of the Planning and Compulsory Purchase Act (PCPA) 2004 by adding the following paragraph:

(2B) So far as the qualifying body considers appropriate, having regard to the subject matter of the neighbourhood development plan, the plan must –

- a) Be designed to secure that the development and the use of land in the neighbourhood area contribute to the mitigation of, and adaptation to, climate change, and*
- b) Take account of any local nature recovery strategy, under section 104 of the Environment Act 2021, that relates to all or part of the neighbourhood area, including in particular –*
 - i) The areas identified in the strategy as areas which –*
 - A) Are, or could become, of particular importance for biodiversity, or*
 - B) Are areas where the recovery or enhancement of biodiversity could make a particular contribution to other environmental benefits,*
 - ii) The priorities set out in the strategy for recovering or enhancing biodiversity, and*
 - iii) The proposals set out in the strategy as to potential measures relating to those priorities.*

2.11 Crucially the new paragraph begins ‘So far as the qualifying body considers appropriate’...’. So, it is for the Parish Council to determine how these new legal requirements are to be addressed and to justify the approach that has been taken, which they have done via the Basic Conditions Statement Addendum that is the subject of this consultation.

2.12 The NDP contains a policy (SR7) which is clear that ‘development proposals will be expected to incorporate the most up to date national and Lancaster City Council sustainability standards relating to climate change and environmental sustainability’, to address part (a) of the changes set out in paragraph 2.9 of this response. Then in relation to part (b) and the Local Nature Recovery Strategy (LNRS), it is important to note that the Lancashire LNRS was not published until the 16th January 2026, which was after the Scotforth Rural NDP was submitted to Lancaster City Council on 4th August, and around the time the Examination of the NDP commenced. Whilst the NDP does not make direct reference to the LNRS (for the reasons explained) the protection, enhancement and recovery of nature is a key aim of the Scotforth NDP iterated through a number of policies within the Plan, seeking opportunities through new development that align with the aims of the LNRS. It is also encouraging that policies within the NDP make direct reference to the Council’s Green and Blue Infrastructure Strategy. As part of the new Local Plan, which is currently being prepared, the Green and Blue Infrastructure Strategy is going to be updated to take account of the recently published Lancashire LNRS to ensure it reflects and supports the direction of this county-wide strategy for nature recovery.

Conclusion

2.13 The Council supports the content of the Basic Conditions Statement Addendum that is the subject of this consultation, and considers the Scotforth Rural NDP to be in accordance with the changes introduced via the LURA on the 25th March 2026.

2.14 Should the examiner require further information or comments on any of the matters raised in the response the Council will be happy to assist in this matter.



The Coal
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For the attention of: Planning Policy

Lancaster City Council

[By email: planningpolicy@lancaster.gov.uk]

15 July 2026

Dear Planning Policy

Re: Scotforth Neighbourhood Plan Consultation on Addendum to Basic Conditions Statement

Thank you for your notification of 6 July 2026 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

However, the area to which this consultation relates is not located within the defined coalfield. On this basis we have no specific comments to make.

Yours

The Coal Authority Planning Team

From: Leyssens, Andrew

Sent: Monday, August 17, 2026 12:50

To: planningpolicy <planningpolicy@lancaster.gov.uk>

Subject: Scotforth Rural Neighbourhood Development Plan (LURA Addendum Consultation) - United Utilities Response

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By email only

Dear Sir / Madam

**Scotforth Rural Neighbourhood Development Plan (LURA Addendum Consultation)
- United Utilities Response**

Thank you for consulting United Utilities on the Addendum to the Basic Conditions Statement for the Scotforth Rural Neighbourhood Development Plan.

Having reviewed the consultation material, United Utilities notes that the purpose of the Addendum is to address the additional neighbourhood planning requirements introduced through Sections 98 and 99 of the Levelling Up and Regeneration Act 2023, including matters relating to climate change and the Lancashire Local Nature Recovery Strategy. The Addendum also provides justification that the Neighbourhood Plan would continue to meet the amended basic conditions.

United Utilities has no specific comments on the Addendum.

Notwithstanding this position, United Utilities welcomes the recognition given to climate change mitigation and adaptation within the Neighbourhood Plan. As a statutory water and wastewater undertaker, United Utilities supports a positive plan-led approach that promotes climate resilience, sustainable water management and multi-

functional green and blue infrastructure. We request that development proposals incorporate measures that reduce flood risk, manage surface water sustainably through the application of the drainage hierarchy and Sustainable Drainage Systems (SuDS), improve water efficiency and contribute towards long-term environmental resilience. Such measures can deliver multiple benefits for communities, the water environment and biodiversity whilst helping to adapt to the effects of climate change.

We have no further comments to make on this focused consultation.

Yours faithfully

Andrew Leyssens



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Homes
England

The Housing and Regeneration Agency

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By email: planningpolicy@lancaster.gov.uk

17 August 2026

Dear Sir / Madam

Consultation on the Scotforth Neighbourhood Plan - Basic Conditions Statement Addendum

Homes England Response

As a prescribed body and landowner in the wider Lancaster area, we would firstly like to thank you for the opportunity to comment on the above consultation.

Homes England is the government's housing and regeneration agency. We are charged with powering a step change in the delivery of homes, sustainable place-making and local economic growth across England. Our mission is to harness our expertise, funding, resources and influence to enable the delivery of high-quality, safe and sustainable homes and vibrant, inclusive communities. Through collaboration with the housing sector and local leaders, we will unlock housing and regeneration opportunities, transform the housing market and drive innovation for lasting impact.

Homes England does not wish to make any representations on the above consultation. We will however continue to engage with you as appropriate.

Yours faithfully,

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Head of Planning and Enabling – North West

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Please send all Local Plan and related consultations to nwlocalplanconsultat@homesengland.gov.uk



20 July 2026

By email only

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Our ref: 00921

To whom it may concern

**SCOTFORTH RURAL NEIGHBOURHOOD PLAN: REPRESENTATIONS TO
CONSULTATION ON ADDENDUM TO BASIC CONDITIONS STATEMENT**

This letter has been prepared on behalf of University Hospitals of Morecambe Bay NHS Foundation Trust ('the Trust') in response to the Scotforth Rural Neighbourhood Plan: Consultation on Addendum to the Basic Conditions Statement.

In March 2025, the Trust submitted representations to the Regulation 14 Draft Neighbourhood Plan. These are enclosed for reference. Those representations related to the Trust's involvement in the national New Hospitals Programme, particularly in relation to the delivery of a new hospital on the site secured at Bailrigg East, to replace the Royal Lancaster Infirmary. The Trust's representations sought to ensure that the Neighbourhood Plan supports and does not prejudice the delivery of this strategically important healthcare infrastructure.

The Trust notes the 'LURA Amendments Addendum' and raises no objection to the Parish Council's assessment of the new climate change and Local Nature Recovery Strategy requirements. However, the Addendum is limited to addressing those legislative changes and does not address the matters previously raised by the Trust in relation to Policy SR1 and the extent of the proposed Area of Separation. Accordingly, the Trust's position remains unchanged. In particular, the Trust continues to consider that the proposed Area of Separation should be supported by robust evidence and should not unnecessarily constrain the delivery of strategic infrastructure, including the new hospital at Bailrigg East.

For the avoidance of doubt, the Trust therefore maintains the representations submitted in response to the Regulation 14 consultation and requests that they continue to be considered as the Neighbourhood Plan progresses. We hope these comments are helpful and would be pleased to continue engaging positively with the Parish Council should any further clarification be required.

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Yours sincerely

Olivia Carr
Director

Representations to Scotforth Rural Neighbourhood Plan – Regulation 14 Draft Plan

**On behalf of University Hospitals of Morecambe Bay
NHS Foundation Trust**

March 2025

Turley

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Olivia Carr

Client

University Hospitals of Morecambe Bay NHS Foundation Trust

Our reference

00921

March 2025

1. Introduction

- 1.1 This report provides representations to the Scotforth Rural Neighbourhood Plan ('SRNP') (Regulation 14 Draft Plan) on behalf of University Hospitals of Morecambe Bay NHS Foundation Trust (hereafter referred to as 'the Trust').
- 1.2 These representations are submitted in relation to the Trust's involvement in the national New Hospitals Programme. University Hospitals of Morecambe Bay NHS Foundation Trust and Lancashire Teaching Hospitals NHS Foundation Trust are working collaboratively on the Lancashire and South Cumbria New Hospitals Programme (L&SC NHP), aimed at addressing significant problems with the ageing hospitals in both Lancaster (Royal Lancaster Infirmary (RLI)) and Preston (Royal Preston Hospital). The government has recently endorsed a revised programme for delivery, with construction of a new hospital to replace the RLI anticipated to begin between 2035 and 2038.
- 1.3 These representations therefore seek to ensure that the SRNP does not prejudice this once-in-a-generation opportunity for Lancaster.
- 1.4 The remainder of this report is structured as follows:
 - Section 2: Lancashire and South Cumbria New Hospitals Programme – background and context, including an overview of the existing RLI estate.
 - Section 3: the Legislative and Policy Context.
 - Section 4: Comments on the draft SRNP.
 - Section 5: Summary and conclusions.

2. Lancashire and South Cumbria New Hospitals Programme

Royal Lancaster Infirmary (RLI)

“We require investment in new hospital infrastructure that will allow us to not only meet but aspire to exceed [national] standards. Our staff and patients deserve hospital facilities that can host the very best in modern healthcare treatments, delivered in an environment that offers care, dignity and privacy. This should be a fundamental tenet of our hospitals rather than an unachievable goal while working within the buildings we currently have.”¹

- 2.1 RLI is the University Hospitals of Morecambe Bay NHS Foundation Trust principal hospital, providing a range of general acute hospital services with an Emergency Department, critical coronary care units and various consultant led services. RLI also provides a range of planned care including outpatients; diagnostics; therapies; maternity and day case and inpatient surgery.
- 2.2 The L&SC NHP Case for Change report² outlines the key challenges that face the RLI estate and why the provision of a new hospital on a new site to replace these existing facilities is a necessity to overcome the wider challenges discussed in paragraph 2.3 above. At the time of the report (published July 2021) these included:
- There is a backlog in maintenance costs totalling £88 million, predominantly relating to the condition of the ageing estate.
 - Running costs are double that of a new build at £442 per m2 due to the age of the site.
 - The site is configured over a challenging topography across around 20 separate buildings of various sizes and ages. Most, but not all of the buildings, are linked by long passages and some buildings are separated from the main complex by public highways. This leads to longer journey times for staff and patients resulting in poor experiences of car, patient discomfort and significant operational efficiencies.
 - Owing to the topographical challenges across the site, access is particularly problematic for people with a disability, with transport to some parts of the hospital is only possible by ambulance.
 - The existing estate fails to meet many Health Building Notes (HBN) standards – for example, single room provision is only 50% of the recommended standard and less than a third of the ambition for 70% single rooms.

¹ Paragraph 3, page 72, Case for Change, Lancashire and South Cumbria New Hospitals Programme (July 2021)

² [Case for Change Report \(healthierlsc.co.uk\)](https://healthierlsc.co.uk)

- Car parking is inadequate with only 460 car parking spaces available for more than 2,500 staff.

2.3 These challenges are significant and are critical to address to ensure that the Trust can continue to serve both the current and future needs of the local population, including that the hospital continues to play a key role in the economic growth of Lancaster and the region as a whole.

L&SC New Hospitals Programme

“The New Hospitals Programme offers Lancashire and South Cumbria a once-in-a-generation opportunity to transform our ageing hospitals and develop new, cutting-edge hospital facilities that offer the absolute best in modern healthcare. Our ambition is to make our region a world leading centre of excellence for hospital care.”³

2.4 In September 2019, the Government introduced its Health Infrastructure Plan⁴ (HIP), which set out a five-year programme of investment in health infrastructure, including a new hospital building programme (NHP) which would deliver more than 40 new hospitals.

2.5 University Hospitals of Morecambe Bay NHS Foundation Trust and Lancashire Teaching Hospitals NHS Foundation Trust were granted seed funding to help develop plans for investment between 2025 and 2030, which subsequently became the Lancashire and South Cumbria New Hospitals Programme (‘L&SC NHP’). The L&SC NHP sits within the wider strategic vision and Clinical Strategy for the Health and Care Partnership, which has three principal aims of delivering safe, sustainable, high-quality services, improving the health and wellbeing of local communities and delivering better joined up care closer to home.

2.6 The L&SC NHP is identified as a “key enabler” in delivering the long-term clinical strategy for the Health and Care partnership, through improving healthcare outcomes and delivering care closer to home for patients. To do this, there are five critical challenges for the L&SC NHP to address:

- 1. Demographic trends and access** – collectively across the L&SC region, the hospitals work together to provide services to a population of 1.8 million people. Across this geography, accessibility to services and travel pose a significant challenge. In addition, the increasing ageing population, increasing mental and physical ill-health, and deep-rooted socio-economic challenges are all anticipated to result in an increase in demand on health services both in and out of hospitals in the future.
- 2. Ageing acute estate** – the hospital estate across L&SC is some of the worst in the north west and does not comply with many of today’s basic standards, restricting the ability to provide high-quality, safe, efficient and cost-effective

³ Paragraph 1, page 03, Case for Change, Lancashire and South Cumbria New Hospitals Programme (July 2021)

⁴ [Health Infrastructure Plan \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

services for communities. In addition, the poor condition of the hospital infrastructure is a structural barrier to our ability to recruit and retain the number of staff required to deliver services. Thus, compromising the ability to operate effectively and for the sustainability as a health service within the region.

3. **Specific-site related problems** – largely linked to the ageing estates. Of most relevance to these representations is RLI, which is discussed further below.
4. **Keeping up with the best in the world** – investment in L&SC hospital infrastructure will enable the Trusts to provide world class facilities, which will strengthen the position as a centre of excellence for research, education and specialised care. Furthermore, embracing digital technologies will enable the creation of an agile network of care, optimising the physical footprints of sites and minimising environmental impact.
5. **Playing a full part in rebuilding the regional economy** – the hospitals across L&SC are some of the region's most significant community assets, being anchor institutions providing healthcare to the population and employment to around 40,000 people. Through the significant investment of the L&SC NHP, this will create more jobs and support the economic growth of the region and localities.

- 2.7 Ultimately, in not investing in healthcare infrastructure through the L&SC NHP, the existing estates will dilapidate even further, compromising the quality of healthcare services that can be provided and draining NHS resources and expenditure. Furthermore, the wider benefits through the investment in healthcare infrastructure including the contribution to economic growth of the local and regional economy, will not be realised. The L&SC NHP Case for Change is clear that:

“The changing requirements and health profiles of our population, along with the need and moral imperative to meet national standards in patient treatment, outcomes and care, mean that our current hospital buildings are unsustainable. In addition to the challenges they create today, they will pose an increasing risk as their conditions deteriorate further and healthcare pressures continue to increase.”⁵

- 2.8 In September 2022⁶, the Trusts in the L&SC NHP stated their preference for new hospitals on new sites for both Royal Preston Hospital (RPH) and Royal Lancaster Infirmary (RLI) as part of the NHP, alongside alternative partial rebuild options. This followed a comprehensive assessment of deliverability, affordability, value for money, and viability, considering feedback from thousands of patients, local people and staff.

⁵ Paragraph 2, page 72, Case for Change, Lancashire and South Cumbria New Hospitals Programme (July 2021)

⁶ [New Hospitals Programme :: Lancashire and South Cumbria NHS reveals recommendations for new hospitals in new locations for Royal Preston Hospital and Royal Lancaster Infirmary in significant development for healthcare in the region](#)

- 2.9 Subsequently, in May 2023, the Government recognised this and included the provision of two new hospitals on new sites for the L&SC NHP as part of a rolling programme of national investment in capital infrastructure beyond 2030.
- 2.10 A significant amount of work has been undertaken to identify potential future locations of the new hospital sites. This included a detailed land search and subsequent assessment of the deliverability and suitability of each identified site through considering clinical requirements and planning, environmental and technical matters.
- 2.11 After considerable negotiations, it was announced in December 2024⁷ that the proposed site for the replacement of RLI is land at Bailrigg East, situated north of and in close proximity to Lancaster University (see **Figure 2.1** below).

Figure 2.1: Proposed site for the replacement of Royal Lancaster Infirmary (Source: <https://newhospitals.info/ProposedSites>)



- 2.12 This area of Lancaster benefits from being highly accessible from the strategic road network, facilitating connections locally and across the region. In addition, Lancaster is identified as a centre of excellence for knowledge led growth, owing largely to the presence of Lancaster University, University of Cumbria and Lancaster University Health Innovation campus, directly to the south of the new hospital site. These assets provide an exciting opportunity to create linkages between the new hospital, to help retain and attract talent to the area and foster the ambition of the L&SC NHP to *“build hospital facilities that attract the best clinical, medical and leadership staff and investing in research and development⁸.”*

⁷ [New Hospitals Programme :: Proposed sites confirmed for two new hospitals in Lancashire](#)

⁸ Paragraph 1, page 73, Case for Change, Lancashire and South Cumbria New Hospitals Programme (July 2021)

- 2.13 In taking this opportunity for a new hospital on the Bailrigg East site, it would elevate Lancaster and the region as a whole through the provision of truly world-class healthcare services and research and development facilities and, in turn, bolster Lancaster's reputation in the knowledge and innovation sector.
- 2.14 The intention once the new hospital is completed would be for the existing RLI site to be disposed of either in part or in its entirety and redeveloped. Currently, the Trust has not progressed any plans for the redevelopment of the existing RLI site. Nevertheless, the site's prominent sustainable location in the centre of Lancaster presents the opportunity for a comprehensive and holistic mixed-use re-development of the site, as outlined through UHMBT's representations to the Lancaster City Council Local Plan Review: Issues and Opportunities consultation (September 2024).

Programme Update

- 2.15 On Monday 20 January 2025, the Secretary of State for Health and Social Care, Wes Streeting made a statement on the outcome of the Government's review into the national New Hospital Programme. The review, which was announced in July 2024, was designed to ensure that the New Hospital Programme could be delivered in a realistic and costed manner.
- 2.16 For the L&SC NHP, the outcome of the review shows an ongoing commitment to delivering two brand-new hospitals on two new sites to replace Royal Preston Hospital (Lancashire Teaching Hospitals NHS Foundation Trust) and Royal Lancaster Infirmary (University Hospitals of Morecambe Bay NHS Foundation Trust), which will create better outcomes for patients and staff across Lancashire and South Cumbria.
- 2.17 Under a revised delivery timetable published on 20 January 2025⁹ construction work on a replacement RLI is expected to start between 2035 and 2038.
- 2.18 In light of the new programme in which the new hospitals are expected to be built, the local NHS has made the decision to pause public engagement on the proposed sites. The planned programme of public events and independent market research will be paused until the appropriate time in accordance with the revised programme of delivery.
- 2.19 Nevertheless, given the SRNP area includes part of the new hospital site, it is considered necessary to submit representations to this with a view to the new hospital being located on this site in the future.

⁹

[New Hospital Programme: plan for implementation - GOV.UK](https://www.gov.uk/government/news/new-hospital-programme-plan-for-implementation)

3. Legislative and Policy Context

3.1 The Neighbourhood Planning (General) Regulations 2012 (as amended) provide the legislative basis for Neighbourhood Planning and sets out the statutory requirements for the process of preparing a Neighbourhood Plan. Neighbourhood Plans must also meet the legal requirements set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended) including that the plan meets the 'basic conditions'. This is also set out in national planning policy (paragraph 37 of the National Planning Policy Framework), and the Planning Practice Guidance (PPG)¹⁰.

3.2 The basic conditions are:

- (a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan.
- (b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Neighbourhood Planning Orders.
- (c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Neighbourhood Planning Orders.
- (d) the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.
- (e) the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- (f) the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.
- (g) prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).

3.3 UHMBT's representations have had full regard to the extent to which the basic conditions are met by the SRNP, and individual policies contained within it, where relevant.

Lancaster City Council Local Plan

3.4 The adopted Lancaster City Local Plan comprises the following Development Plan Documents (DPD):

¹⁰ Paragraph: 065 Reference ID: 41-065-20140306

- Local Plan Part One: Strategic Policies and Land Allocations (climate emergency review) DPD (adopted 22 January 2025)
 - Local Plan Part Two: Development Management (climate emergency review) DPD (adopted 22 January 2025)
 - Morecambe Area Action Plan DPD (December 2014)
 - Arnsdale and Silverdale AONB DPD (28 March 2019)
 - Minerals and Waste Local Plan (adopted 2009 and 2013)
 - Made Neighbourhood Plans
- 3.5 It is acknowledged that the SRNP has been prepared to be ‘in general conformity’ with the above adopted Local Plan for Lancaster.
- 3.6 Lancaster City Council (LCC or ‘the Council’) are currently in the process of preparing a new Local Plan for Lancaster. This was initiated through the suspension of work on the ‘South Lancaster Growth Catalyst’ which would have enabled significant development to the south of Lancaster, including Bailrigg Garden Village. As such, LCC resolved to prepare a whole new Local Plan.
- 3.7 An initial ‘Issues and Opportunities’ consultation on the new Local Plan was held between July and September 2024. UHMBT prepared representations to this consultation in relation to the following important opportunities for the district:
- The provision of a new hospital on a new site to replace the Royal Lancaster Infirmary in accordance with the Lancashire and South Cumbria New Hospitals Programme – this would be secured through a site allocation and associated policy within the new Local Plan.
 - The redevelopment of the existing Royal Lancaster Infirmary following the successful delivery of the new hospital – this would be secured through a site-specific policy relating to the redevelopment of the existing RLI site to deliver a comprehensive and holistic mixed-use development opportunity.
- 3.8 These representations demonstrated that the above developments align closely with the vision and issues and opportunities outlined and will make a significant contribution to the overall success of the new Local Plan – in particular in securing healthy communities and economic prosperity for Lancaster and the wider region.
- 3.9 UHMBT will continue regular liaison with LCC and engage with the local plan process to ensure the above opportunities can be realised in the new Local Plan.
- 3.10 In this context, it is important to note that the plan period for the SRNP is between 2025 and 2031 and has been prepared in line with the currently adopted Local Plan for Lancaster (adopted in January 2025). At the point the new Local Plan is adopted, the more recent policy takes precedent in the decision-making process¹¹. Such that any policy within the SRNP that conflicts with the adopted plan would be considered ‘out-of-date’ and the SRNP would most likely need reviewing in the context of the new Local Plan.

¹¹ Planning Practice Guidance: paragraph 084, Reference ID: 41-084-20190509

4. Comments on the Scotforth Rural Neighbourhood Plan

- 4.1 This Section seeks to provide comments on the draft SRNP. It does not respond to all aspects of the Plan, only those deemed relevant to the Trust and more specifically the L&SC NHP.

Draft Policy SR1 Bailrigg Area of Separation

- 4.2 Draft Policy SR1 has been prepared in response to Policy EN6 of the LPP1, which states that:

“It is also the Council’s intention to provide further Areas of Separation to the South of Lancaster as part of the Bailrigg Garden Village to provide separation from the new development to Galgate, Bailrigg Village and South Lancaster. These areas will be specifically defined with the forthcoming Lancaster South Area Action Plan DPD.”

- 4.3 As the Council have suspended work on the Lancaster South Area Action Plan DPD, and are instead preparing a new Local Plan, Scotforth Parish Council have sought to address the requirement for an Area of Separation around Bailrigg Village within LPP1 Policy EN6 through the SRNP.

- 4.4 The Trust do not oppose in principle to the SRNP identifying an Area of Separation around Bailrigg Village and consider that this does align with the LPP1, Policy EN6. Rather, the Trust would query whether the extent of the proposed Area of Separation accurately reflects the potential impact and necessary mitigation, and the prescriptiveness of the draft policy wording.

Extent of the Area of Separation

- 4.5 It is understood that the proposed boundary it is derived from the conclusions of the ‘Landscape Character Assessment and Evidence Base to Inform Areas of Separation in Scotforth’ prepared by EPD Landscape (September 2024).

- 4.6 This considers the following features in defining the Area of Separation:

- Northern boundary is defined by the power lines traversing the landscape from the A6 to the M6
- Elevated land to the north, resulting from the drumlin landscape character
- Physical boundary of the M6 to the east with land rising -up to the motorway
- Southern boundary defined by Lancaster University playing fields
- Western boundary defined by fields and the back of the Health Innovation Campus at Lancaster University

- 4.7 In reviewing the extent of the Area of Separation proposed, the following are relevant and are discussed in turn below:

- Conclusions made by the Inspector in determining the planning appeal by Gladman Developments Ltd ('Gladman') (LPA ref. 19/01135/OUT and Appeal ref. APP/A2335/W/24/3345416) (Decision 21 November 2024)
- Evidence prepared to inform the preparation of the Lancaster Local Plan Part One

Gladman Appeal Decision

4.8 **Appendix 1** provides an extract of the Parameters Plan for the Gladman appeal scheme, with the proposed Area of Separation overlaid. The Parameters Plan identifies parcels of residential development (up to a maximum height of 9.6m) and internal roads within the proposed Area of Separation identified by the draft SRNP Policy SR1. Such development by virtue of the proposed wording of draft SRNP Policy SR1 would not be permitted.

4.9 However, the Inspector concluded at paragraphs 78 – 80 of the appeal decision¹² the following in relation to landscape impact of the proposed development and the proposed Area of Separation in the draft SRNP (our emphasis in **bold**):

“78. Scotforth Parish Council in their representation make reference to a Landscape Character Assessment Study undertaken to support the Neighbourhood Plan. This outlines a suggested Area of Separation which it states would provide protection from inappropriate development and stop the coalescence of settlements namely Lancaster and Bailrigg and Bailrigg and the University and prevent wider change in the landscape character. Figure 8 of the document illustrates an Area of Separation extending north to the power lines which cross the appeal site, east to the motorway and to the University boundary to the south.

79. The Development Framework Plan and Parameters Plan illustrate the provision of open space including allotments, SuDS features, footpaths and cycle routes new woodland and planting around Bailrigg Village. It extends further to the north than suggested by the Landscape Study but does not extend as far to the east and south.

*80. I bear in mind that Policies SG1 and EN6 are in the context of delivering the Garden Village, of which the appeal scheme is not a part. Nevertheless, **I consider that the proposed development provides an appropriate degree of separation to Bailrigg Village meeting the objectives of the above policies.**”*

4.10 Overall, the Inspector concluded that there would be limited landscape harm, as the scheme involves built development on a greenfield site (paragraph 96).

4.11 Furthermore, in relation to heritage impact, both parties in the planning appeal – Gladman and Lancaster City Council – agreed in the Statement of Common Ground that there are no heritage grounds for withholding planning permission. It was also agreed that the development would cause less than substantial harm to the setting of Bailrigg Farmhouse, with any harm being outweighed by the benefits of the scheme.

¹²

[3345416 and 3345417 Appeal Decision](#)

- 4.12 Therefore, in the context of both of the landscape and heritage considerations the Inspector did not consider these identified harms as a reason to dismiss the appeal.
- 4.13 Importantly, as noted above, the Inspector concluded that the proposed development provides an appropriate degree of separation to Bailrigg Village and meets the objectives of the relevant Local Plan Policies SG1 and EN6.
- 4.14 On this basis alone, it is recommended that the extent of the Area of Separation, particularly to the east and south is reconsidered and redrafted.

Lancaster Local Plan Part One Evidence Base

- 4.15 The LPP1 was informed by the following:
- Landscape Assessment of Emerging Site Options (Bailrigg, Lancaster), prepared by Woolerton Dodwell (November 2012)
 - Identified Sites Landscape and Visual Impact Assessments, prepared by Arcadis (July 2018)
- 4.16 Each of these assessments confirmed that development at Bailrigg would result in fundamental changes in existing open character and some existing views. However, that the magnitude of change and significance of effects on landscape character and value arising from development could be mitigated to some extent. This includes through:
- The establishment of undeveloped buffer zones.
 - The provision of a network of green infrastructure to reduce the scale and massing of built development, including through the retention of existing trees and hedgerows where possible.
 - Setting development withing smaller blocks, where possible, set within the green infrastructure to provide screening and allow integration into the landscape.
- 4.17 The 2012 report identified a potential mitigation plan (**Appendix 2**) which identified how the above elements could be defined across the site to provide appropriate mitigation. This included defining indicative buffer zones. These are identified around the boundaries of the site, around Bailrigg Village and also along the elevated part of the site.
- 4.18 Whilst the Trust may not agree with all of the indicative buffer zones identified, this does demonstrate that a much smaller mitigation area around Bailrigg Village was considered as providing suitable mitigation with regards to landscape and heritage impacts. This is more aligned with how the proposed development in the Gladman scheme was presented, and what the Inspector ultimately deemed as appropriate.
- 4.19 Whilst the Landscape Assessment prepared for the SRNP was undertaken more recently, given the findings between the 2012, 2018 and 2024 assessments remain generally in accordance with one another, it is queried as to how the conclusions

drawn between what is suitable mitigation and ultimately the extent of the Area of Separation can differ so much.

- 4.20 It is suggested that an independent assessment of all available landscape evidence is undertaken, to ensure that the extent of the Area of Separation is fully justified and aligns with the Local Plan Policies SG1 and EN6. Failure to do so would compromise the SRNP meeting the basic conditions for a neighbourhood plan.

Summary on extent of Area of Separation

- 4.21 The conclusions of the Inspector in the Gladman appeal and the evidence prepared to inform the LPP1 would suggest that the proposed boundary of the Area of Separation in draft SRNP Policy SR1 is not justified. Therefore, this should be analysed through further assessment to ensure it is robust and does not prejudice sustainable development being brought forward on the site.
- 4.22 In not doing so, this would conflict with Policies SG1 and EN6 of the LPP1, such that draft SRNP Policy SR1 would not meet the basic conditions for a neighbourhood plan.

Proposed wording of draft policy SR1

- 4.23 The draft policy outlines the following:

“Within the Area of Separation proposals which maintain and enhance the general open and green character will be supported as part of development schemes. This could include for example landscaping, green space and play areas which form part of a buffer, separating the village and its setting from encroaching-built form. Proposals for low level solar panel arrays may be acceptable provided the site is restored to its open character at the end of its operational lifetime and period of planning consent.”

- 4.24 It is not considered necessary for the policy to be this prescriptive. This does not align with Policy EN6 in the LPP1, which states:

“Development proposals within Areas of Separation will be considered against how such proposals affect the openness and visual amenity of this area. Proposals will not be supported where they have impacts on wider openness within the areas and result in the coalescence between settlements and affect overall distinctiveness.”

- 4.25 Furthermore, as above, the Inspector concluded that the development proposed by Gladman provides an appropriate degree of separation to Bailrigg Village and meets the objectives of the relevant Local Plan Policies SG1 and EN6. The proposed development included built development within the proposed Area of Separation.
- 4.26 It should therefore be for development that comes forward on the site or within the Area of Separation to demonstrate how the proposals affect the openness and visual amenity of the area and determine the development appropriate in such areas to mitigate any impact.
- 4.27 The policy wording should therefore be amended to remove paragraph 3 to ensure it aligns with Local Plan policy EN6 and therefore meets the basic conditions for a neighbourhood plan.

5. Summary and Conclusions

- 5.1 This report provides representations to the SRNP (Regulation 14 Draft Plan) on behalf of University Hospitals of Morecambe Bay NHS Foundation Trust.
- 5.2 These representations are submitted in relation to the Trust's involvement in the national New Hospitals Programme. University Hospitals of Morecambe Bay NHS Foundation Trust and Lancashire Teaching Hospitals NHS Foundation Trust are working collaboratively on the Lancashire and South Cumbria New Hospitals Programme (L&SC NHP), aimed at addressing significant problems with the ageing hospitals in both Lancaster (Royal Lancaster Infirmary (RLI)) and Preston (Royal Preston Hospital). Of which the government has endorsed the delivery of these two new hospitals through the revised programme announced in January 2025.
- 5.3 The Trust has outlined specific concerns with regards to the proposed Area of Separation around Bailrigg Village, proposed through draft SRNP Policy SR1. The Trust consider that further review and assessment is required to define an appropriate boundary which considers all available evidence, including that produced as part of the LPP1 preparation and the recent conclusions on landscape and heritage impact by the Inspector in deciding the Gladman planning appeal.
- 5.4 In its current form the draft SRNP Policy SR1 does not reflect policies in the Local Plan and also national policy, such that it does not meet the basic conditions for a neighbourhood plan and should be revisited and redrafted.
- 5.5 This is in the context of the proposed new hospital for Lancaster being identified to be located on the land to the north of Bailrigg Village, as recently endorsed by the government. These representations seek to ensure that the SRNP does not prejudice this once-in-a-generation opportunity for Lancaster.
- 5.6 The Trust is also actively engaging with Lancaster City Council in the preparation of the new Local Plan for the district and have sought through representations to the most recent Issues and Opportunities consultation for the following:
- The provision of a new hospital on a new site to replace the Royal Lancaster Infirmary in accordance with the Lancashire and South Cumbria New Hospitals Programme – this would be secured through a site allocation and associated policy within the new Local Plan.
 - The redevelopment of the existing Royal Lancaster Infirmary following the successful delivery of the new hospital – this would be secured through a site-specific policy relating to the redevelopment of the existing RLI site to deliver a comprehensive and holistic mixed-use development opportunity.
- 5.7 These representations demonstrated that the above developments align closely with the vision and issues and opportunities outlined and will make a significant contribution to the overall success of the new Local Plan – in particular in securing healthy communities and economic prosperity for Lancaster and the wider region.

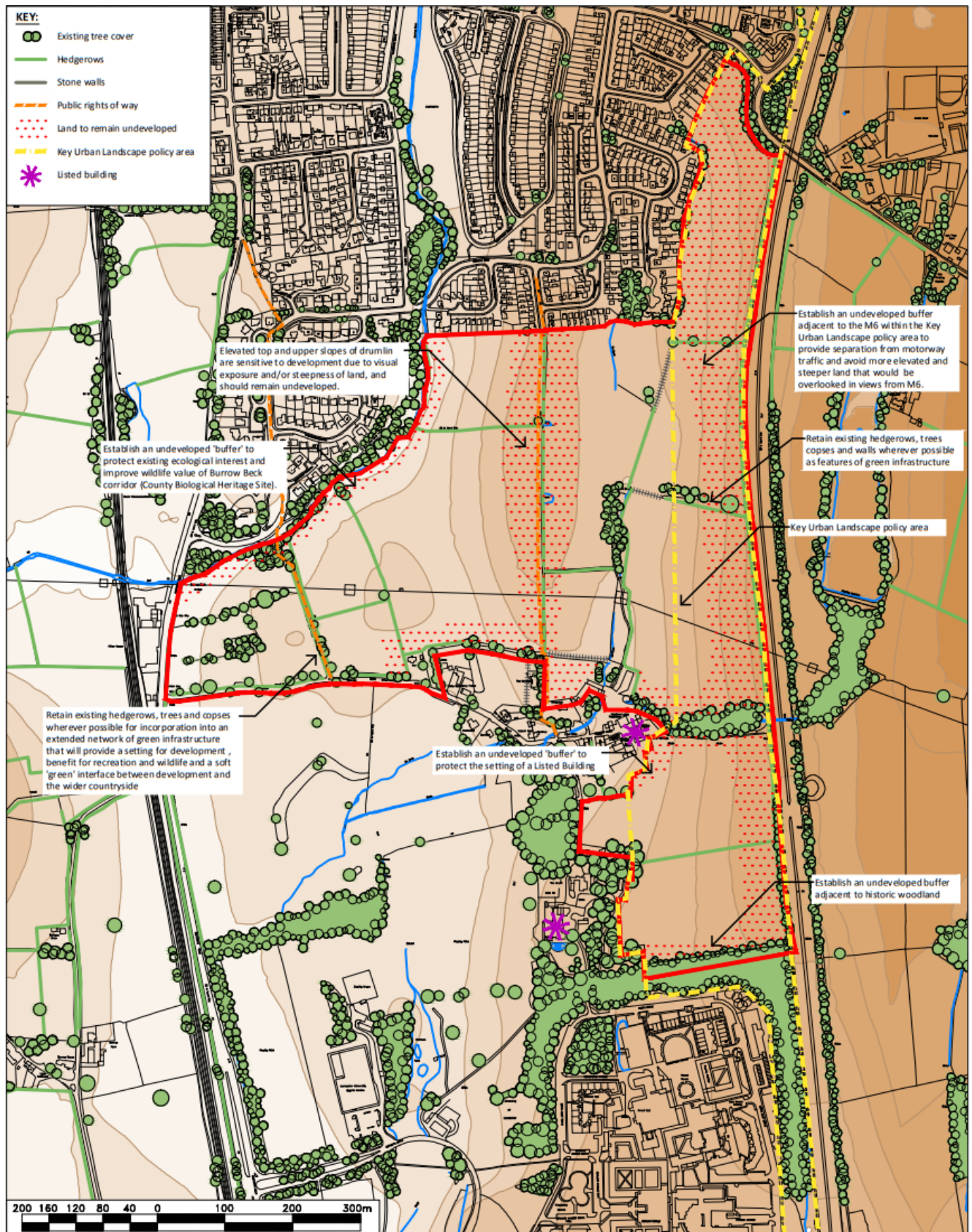
- 5.8 It is important to note that the plan period for the SRNP is between 2025 and 2031 and has been prepared in line with the currently adopted Local Plan for Lancaster (adopted in January 2025). At the point the new Local Plan is adopted, the more recent policy takes precedent in the decision-making process¹³. Such that any policy within the SRNP that conflicts with the adopted plan would be considered 'out-of-date' and the SRNP would most likely need reviewing in the context of the new Local Plan.

¹³ Planning Practice Guidance: paragraph 084, Reference ID: 41-084-20190509

**Appendix 1: Extract of Parameter Plan of
Gladman Developments Ltd
Proposed Development on land
north of Bailrigg Village**



**Appendix 2: Landscape Assessment of Emerging
Site Options, Bailrigg, Lancaster:
Potential for Mitigation (November
2012)**



Landscape Assessment
of Emerging Site Options
in the Lancaster District Land Allocation DPD

WOOLERTONDODWELL
Landscape Architecture • Environmental Planning

Bailrigg, Lancaster : Potential for Mitigation

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Bailrigg Village Residents Association Response to Consultation regarding Scotforth Rural Neighbourhood Development Plan

Bailrigg Village Residents Association wish to record its support for the Scotforth Rural Neighbourhood Development Plan (Neighbourhood Plan) and our belief that the Neighbourhood Plan does meet the requirements of the Levelling Up and Regeneration Act, sections 98 and 99. We believe that the published 'addendum' sets out robust evidence of that conformity.

The Neighbourhood Plan has core themes of addressing the impact of climate change and ensuring development in and around its existing rural housing is in keeping, of high quality and of appropriate type to meet local housing needs, whilst not impeding the Local Plan's strategic housing targets in its policy SG1. This absolutely meets the requirements of the Levelling Up and Regeneration Act regarding addressing Climate Change and not inhibiting Local Plan housing targets from being met.

To be clear, the Area of Separation around Bailrigg do not constrain the ability of developers to deliver the existing Local Plan target of 3500 houses in the 'Broad Location of Growth' because the Broad Location of Growth is so vast that it could physically fit in tens of thousands of houses if the developers so wished. Instead, the Area of Separation and the Bailrigg Development Boundary provides clarity for one very small part the Broad Location of Growth and effectively provides detail for the Local Plan policy EN6 - Areas of Separation.

It would be wrong for developers to claim that the Neighbourhood Plan prevents the Local Plan housing targets from being delivered for the following reasons: (i) the Neighbourhood Plan area only overlaps with about half of the Broad Location of Growth and SG1 does not specify specific locations for where actual housing will go, (ii) developers have failed to put forward any location proposals for 3500 houses, and (iii) almost all of the land around Bailrigg is now provisionally designated for a new hospital site anyway.

Yours Faithfully,

Elisa Barberan
Chair, and on behalf of, Bailrigg Village Residents Association

14 August 2026

Scotforth Rural Neighbourhood Plan Consultation - Addendum

Submitted Time: July 15, 2026 11:50 AM

Creation Time: August 18, 2026 12:29 PM

Your Name

Community Campaigner David Barton

Do you support the Scotforth Rural Neighbourhood Plan in meeting the new legal requirements and basic condition, made through the Levelling Up and Regeneration Act (Sections 98 (3) and 99 (3)), as set out within the Basic Conditions Statement Addendum?

Yes

If you answered no please advise why

Include Traditional Architecture as a forefront focus for all new construction with protections for existing historic fabric- whether Non-Designated Heritage Assets or Unclassified Buildings.

Would you like to be notified whether the plan proposal is made (adopted) by the Council

Yes

Scotforth Rural Neighbourhood Plan Consultation - Addendum

Submitted Time: July 21, 2026 1:20 PM

Creation Time: August 18, 2026 12:29 PM

Your Name

Robert Wilson

Agent Details (if applicable)

Do you support the Scotforth Rural Neighbourhood Plan in meeting the new legal requirements and basic condition, made through the Levelling Up and Regeneration Act (Sections 98 (3) and 99 (3)), as set out within the Basic Conditions Statement Addendum?

Yes

If you answered no please advise why

Would you like to be notified whether the plan proposal is made (adopted) by the Council

Yes