

LCC4.1.2



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# Developing a Local Plan for Lancaster District

LCC4.2 – Updated list of representation in policy order  
(additional representation highlighted in green)  
(February 2019)

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Inter) ATTENDING EXAMINATION
044/04/AppB/NLCS/US1-4	Janet Taylor	N/A	Development Management DPD	Appendix B	N/A	N/A	NLC/5	US/1 US/2 US/3 US/4	Further documentation should be added to Appendix B in relation to flood risk matters.	Reference should be added to the SuDS manual and CIRIA, Designing for excellence in urban drainage - good practice.	Yes
148/20/AppE/LC/5	Jon Power	CBRE on behalf of Lancaster University	Development Management DPD	Appendix E	N/A	N/A	LC	5	The University would wish to reiterate comments to promote sustainable journeys to and from the University. The provision of car parking facilities within the campus will be subject to review in order to ensure that the convenience for staff and visitors is achieved through realistic car parking provision.	No suggested amendments made.	Yes
148/21/AppG/LC/5	Jon Power	CBRE on behalf of Lancaster University	Development Management DPD	Appendix G	N/A	N/A	LC	5	The University considers that the space standards set out in Appendix G should recognise the Housing White Paper's stance on reviewing national space standards.	Appendix G should consider the content of the Housing White Paper.	Yes
051/20/DM1/LC/US1	Dan Mitchell	Barton Willmore on behalf of H2O Urban LLP	Development Management DPD	Chapter 05	DM 01	N/A	LC	US/1	Our client is supportive of a policy which seeks to plan for the needs of local communities and provides a correct mix of housing. It is noted that this requires a mix of house types and sizes in accordance with the Council's latest evidence base. The Council state that they intend to bring forward an SPD on this matter, this should have been prepared as part of the evidence base. The policy seeks to support schemes that promote balanced communities - it is not clear what this meant by this term.	Clarification required on elements of this policy. Preparation of an SPD should be prioritised.	Yes
106/22/DM1/LC/5	Craig Barnes	Barton Willmore on behalf of Storey Homes	Development Management DPD	Chapter 05	DM 01	N/A	LC	5	Our client considers the proposed policy approach is sufficiently justified and flexible to ensure that policy can be implemented effectively in accordance with specific site conditions. The policy will be effective in enabling the Council to ensure that the supply of housing is responsive to the need for varying types and sizes of housing.	No suggested amendments made.	Yes
054/12/DM1/5.12/LC/US2-4	Chris Garner	Garner Planning on behalf of Russell Armer Ltd	Development Management DPD	Chapter 05	DM 01	5.12	LC	US/2 US/3 US/4	Paragraph 5.12 sets out a table showing an indicative approach to housing mix based on the SHMA. This implies that every scheme must comply with the table unless it can be justified that should not be the case. The policy as written is far too prescriptive and cannot state unconditionally that an up-to-date village or parish needs assessment is more appropriate indication of housing need without knowing what evidence such studies are based on. [Further detail provided in the representatives full response.]	The Housing Needs element of the policy - delete the existing wording and state "The Council will support proposals that seek to promote balanced communities and seek to provide for a range of identified housing needs."	Yes
097/06/DM1/LC/US3	Joanne Harding	Home Builders Federation	Development Management DPD	Chapter 05	DM 01	N/A	LC	US/3	Policy DM1 is not considered to be sound as it is not effective. The HBF consider that the effective use of land is a generally positive way to contribute to sustainability, however it should not compromise the delivery of housing to meet local needs and limit the delivery of sustainable sites.  The HBF understand the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. However, it is important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements.  The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that schemes are viable and provide for an appropriate mix for the location. The HBF would also highlight the need for creating a housing market that will attract investors to Lancaster and provide an element of aspiration to ensure working people and families are retained within the area.	The HBF propose that the policy is modified to make references to the local market. The HBF also recommend that the policy makes clear that there may be further reasons than those listed in part (ii) and (v) for the full range of housing need not be met. Detailed wording is provided in the representatives full response.	Yes
128/09/DM1/LC/US1-4	Aqub Saghir	NUL Consulting on behalf of Persimmon Homes	Development Management DPD	Chapter 05	DM 01	N/A	LC	US/1 US/2 US/3 US/4	This policy does not provide sufficient flexibility to allow developers to provide a mix of housing considered appropriate for the site. The developer needs to be respond to market demand that is often changing and the Council's evidence may not always be up to date. Without amendment there is a potential that sites will not come forward due to restrictions which result in proposals being unviable.	The policy needs to be amended to make provision to include that land is used efficiently.	No
124/06/DM1/LC/US1-4	Michael Gilbert	Peter Brett Associated on behalf of Hurstwood Holdings	Development Management DPD	Chapter 05	DM 01	N/A	LC	US/1 US/2 US/3 US/4	We broadly support the approach set out in this emerging policy which seeks to ensure that available housing land is used efficiently and located in sustainable locations. The land at Lune Industrial Estate is currently underused and previously developed.	No suggested amendments made.	Yes
028/06/DM1/LC/5	Adam Key	Savills on behalf of the Balthigg Farmland Trustees	Development Management DPD	Chapter 05	DM 01	N/A	LC	5	Policy DM1 is supported as drafted. We welcome the recognition that the delivery of affordable housing should be subject to viability considerations and testing.	No suggested amendments made.	Yes
051/21/DM2/LC/US1-3	Dan Mitchell	Barton Willmore on behalf of H2O Urban LLP	Development Management DPD	Chapter 05	DM 02	N/A	LC	US/1 US/2 US/3	Our client is supportive of the principle of nationally described space standards, where it can be demonstrated that this can be provided. However, the Council must ensure that in order to achieve these standards that this does not result in unnecessary barriers which may impact on the overall density and capacity of the proposed allocations.  Whilst our client is supportive in principle of the need to provide dwellings which are accessible and adaptable, the requirements in the DPD should remain at 10% (as per standard building regulation) and not be increased to 20% as per the proposed policy.	Requirements for accessible and adaptable housing to be reduced from 10% to 20%.	Yes
106/23/DM2/LC/5	Craig Barnes	Barton Willmore on behalf of Storey Homes	Development Management DPD	Chapter 05	DM 02	N/A	LC	5	This policy provides confirmation of the Council's standards for new housing to be developed over the plan period. Whilst much of the requirements are set out in Building Regulations, the inclusion of this policy within the Local Plan provides additional clarity for applicants. The policy is sufficiently flexible to allow divergence from Building Regulations where exceptional circumstances can be demonstrated.	No suggested amendments made.	Yes
054/13/DM2/LC/US2-4	Chris Garner	Garner Planning on behalf of Russell Armer Ltd	Development Management DPD	Chapter 05	DM 02	N/A	LC	US/2 US/3 US/4	The explanation of this policy provides no evidence of the need to apply space standards or evidence that the viability implications have been considered.  The imposition of space standards may preclude the provision of smaller open market dwellings in the future and will have a major implication on the price of dwellings. [Further detail provided in the representatives full response.]	Delete the entire policy.	Yes
146/09/DM2/NLCS/US1-4	John Fleming	Gladman Developments Ltd	Development Management DPD	Chapter 05	DM 02	N/A	NLC/5	US/1 US/2 US/3 US/4	In principle Gladman recognise the importance of delivering housing to assist in meeting needs for older people and those with mobility issues. However it appears that this evidence has been prepared after the submission of the Local Plan for examination. The Council should not be seeking to retrofit its evidence as to do so would be unjustified.  Gladman refer to the PPG which provides guidance on the use of the optional technical standards. Before pursuing any such policy requirement, the Council will need to ensure through its evidence base that Policy DM2 is in line with guidance and that the justification and specific detail of the policy take account of various factors which the PPG refers to.  Gladman do not consider that sufficient evidence has been made available to support the requirements set out in Policy DM2. Although it is accepted that evidence suggests an ageing population this alone does not justify the use of optional building regulations. When considering this policy the Council need to be aware of the knock-on effects that this could have on housing delivery and viability.  With regard to internal space standards, Gladman refer to the 2015 Written Ministerial Statement which confirms that these are optional standards which need to be clearly evidenced and their impact on viability considered. If the Council wishes to adopted localised standards it should be justified by meeting the criteria set out in PPG.  With regard to water efficiency standards Gladman support the Council in the view that given the county does not fall into a serious water stress area and that we are not aware of any further evidence to indicate water stress in this area it is not appropriate to implement the tighter optional requirement. [Further detail provided in the representatives full response.]	No suggested amendments made.	Yes
097/07/DM2/LC/US2-4	Joanne Harding	Home Builders Federation	Development Management DPD	Chapter 05	DM 02	N/A	LC	US/2 US/3 US/4	Policy DM2 is not considered to be sound as it is not effective, justified or consistent with national policy. The policy seeks to introduce optional housing standards for space and accessibility. The enhanced standards, as introduced by the Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability.  In preparing such policies local planning authorities should take account of the need (evidence should be provided on the size and type of dwellings currently being built in the area), viability (the financial impacts of adopting the space standard should be considered) and timing (there may need to be a reasonable transitional period in adopting such standards). The Council will need robust evidence to introduce any of the optional housing standards. The HBF consider that standards can have negative impact on viability, increase affordability issues and reduce customer choice. The industry knows its customers and what they want, so members would not sell homes below the enhanced standard size if they did not appeal to the market. The HBF is supportive of providing homes for older and disabled persons, however if the Council wishes to adopt higher optional standards for accessible and adaptable homes the Council should only do so by applying the criteria set out in national planning guidance. The Council should be mindful that it is unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery. The HBF does not consider that this policy is required, it is considered that local needs can be met without the introduction of the optional housing standards. However, if the Council wish to pursue this policy the HBF recommend that the Council ensure that an appropriate evidence base is available to support this policy in line with national guidance. [Further detail provided in the representatives full response.]	The HBF proposed that the policy is deleted in its entirety.	Yes
169/15/DM2/LC/US1	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Development Management DPD	Chapter 05	DM 02	N/A	LC	US/1	Policy DM2 introduces a number of 'optional' housing standards for new residential development. Provided these criteria remain optional and aspirational, subject to site specific viability then CEP have no objections to their inclusion in the DPD. Should development which cannot meet the standards be prevented from coming forward however then this approach is not sound.	No suggested amendments made.	Yes
128/10/DM2/LC/US1-4	Aqub Saghir	NUL Consulting on behalf of Persimmon Homes	Development Management DPD	Chapter 05	DM 02	N/A	LC	US/1 US/2 US/3 US/4	Our client consider this policy should be removed in its entirety as it sets limitations on developers and will have significant repercussions on the delivery of homes.  The Policy also makes provision for adaptable homes, requiring at least 20% of new affordable and market housing of more than 10 dwellings to meet Building Regulation M4(2). Persimmon understand and support the provision of adaptable homes, however the policy must be consistent with national planning policy which clearly states that this can only be provided where there is clear evidenced need and where its impact on viability has been considered.	It is respectfully requested that the Council reconsider the inclusion of this policy.	No
100/01/DM2/LC/US1&2&4	David Barnes	Star Planning on behalf of Seemore Properties Ltd	Development Management DPD	Chapter 05	DM 02	N/A	LC	US/1 US/2 US/4	Seemore Properties support the principle of some affordable housing being accessible and adaptable dwellings. However, the 20% requirement is considered excessive especially where there is a lack of viability evidence to support such provision. Building Regulation M4(2) is an option regulation, where other authorities have sought to apply such a standard the threshold has generally been 10% subject to site considerations.	Policy DM2 should apply a 10% threshold subject to site conditions.	Yes
163/17/DM2/LC/US2-3	David Diggle	Turley on behalf of Peel Holdings Investments	Development Management DPD	Chapter 05	DM 02	N/A	LC	US/2 US/3	Policy DM2 seeks to specify that at least 20% of affordable/ market housing on schemes of more than 10 dwellings will be expected to meet Building Regulation M4(2). This is an additional cost to development which may have an impact on development viability. The Council have yet to undertake a viability appraisal of the plan and consequently the impact of additional costs are yet to be tested.  Peel welcome the flexible approach to the delivery of accessible and adaptable dwellings but would assert that the exceptional circumstances listed should not be considered an exhaustive list.	The Council should identify within the policy itself that they consider the viability of the scheme and other benefits arising when considering whether the 20% requirement should be applied.	Yes
030/05/DM2/NLCS/US2-4	Helen Binns	Walsingham Planning on behalf of KCS Development Ltd	Development Management DPD	Chapter 05	DM 02	N/A	NLC/5	US/2 US/3 US/4	Objection is raised to this policy on the basis that the introduction of such standards will adversely impact on the density of housing and significantly increase costs, which will affect viability. The policy is considered to be unsound and not justified.	This issue could be resolved by removing the requirement for at least 20% of buildings to comply with Building Regulations M4(2).	No
051/22/DM3/LC/US	Dan Mitchell	Barton Willmore on behalf of H2O Urban LLP	Development Management DPD	Chapter 05	DM 03	N/A	LC	US	Reference should be made to the draft NPPF which identifies the need to provide a range of house types which include a range of affordable housing products. The draft NPPF makes reference to where major housing development is proposed at least 10% should be made available for affordable home ownership.  Our client is supportive in principle of the provision of affordable housing, notwithstanding this, for developments over 11 dwellings the Council is seeking to apply 30% affordable housing requirement on brownfield land and 40% on greenfield sites. It is unclear which policy is to be applied as they are not consistent with each other. It is our clients position that affordable housing provision should be properly assessed through viability appraisal.  Reference is made to the preparation of a Viability Appraisal SPD, no details are available and further clarification on when this will be published and how it will be informed is required before further comments can be provided.	No suggested amendments made.	Yes
106/24/DM3/LC/US2-4	Craig Barnes	Barton Willmore on behalf of Storey Homes	Development Management DPD	Chapter 05	DM 03	N/A	LC	US/2 US/3 US/4	In principle our client supports the approach of Policy DM3 as it recognises that the financial capacity of development to viably deliver affordable housing across the district can vary. Policy DM3 sets a range of affordable housing requirements for brownfield and greenfield sites. Our client is concerned by the absence of supporting evidence which confirms the deliverability of this requirement on sites within the district. There is no up-to-date assessment of viability and as a result there is no evidence to justify the proposed affordable housing requirements are deliverable. It is further unclear why the Council consider affordable housing differently in the AONB than locations outside of this designation. [Further detail provided in the representatives full response.]	No suggested amendments made.	Yes
109/03/DM3/LC/US1-3	Claire Pegg	Cushman & Wakefield on behalf of the L&K Group Plc	Development Management DPD	Chapter 05	DM 03	N/A	LC	US/1 US/2 US/3	With regard to the Viability Assessment, in light of this evidence it is clear that the affordable housing requirement set out in Policy DM3 should be reduced to 20% on brownfield sites in Lancaster proposing more than 10 dwellings. We would point out that Policy DM3 is not aligned with Policy H5 of the Strategic Policies & Land Allocations DPD. [Further detail provided in the representatives full response.]	Policy DM3 should be reworded to reflect the outcomes for the viability assessment.	Yes
054/14/DM3/LC/US2-4	Chris Garner	Garner Planning on behalf of Russell Armer Ltd	Development Management DPD	Chapter 05	DM 03	N/A	LC	US/2 US/3 US/4	The NPPF indicates the need for careful attention to viability and costs and the need to avoid onerous scale of obligations and policy burden (paragraph 173).  Lancaster City Council are yet to produce a Viability Assessment and therefore this policy cannot be progressed in the absence of this evidence.  The affordable housing criteria requires affordable housing to be in perpetuity which is considered unjustified. It seeks to preclude any stair-casing to full ownership and is contrary to the Government's intention to encourage home ownership. The policy intends to give development plan status to a Viability Protocol SPD which has yet to be produced and will not have the same level of scrutiny as a development plan policy. This not appropriate. The viability test is onerous.	Hold the Local Plan in abeyance until the viability evidence is made available and appropriate consultation has taken place with the development industry.  Delete criteria 'in perpetuity' clause.	Yes
097/08/DM3/LC/US2-4	Joanne Harding	Home Builders Federation	Development Management DPD	Chapter 05	DM 03	N/A	LC	US/2 US/3 US/4	Policy DM3 is not consider to be sound as it is not effective, justified or consistent with national policy. The HBF supports the need to address the affordable housing requirements of the district. The NPPF is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability. However, at present there does not appear to be a viability report available to support this document and therefore it is not possible for the HBF to comment on the viability of this policy or others.  It is noted that a viability clause is included within this policy, whilst this is supported it should not be used as a mechanism to justify and unsustainable affordable housing target.	The HBF recommends that further consideration is given to the viability of development in relation to the requirements of this policy and other policies within the Plan.	Yes
190/05/DM3/LC/US3	Michael Mumford	Lancaster and Morecambe Liberal Democrats	Development Management DPD	Chapter 05	DM 03	N/A	LC	US/3	Affordable housing is key issue nationally, it has been repeatedly shown that developers have gone back on the promised proportions of affordable housing once planning permission has been granted. A recent report by the National Audit Office noted that fewer than half the authorities were likely to meet the housing targets and in more of these increasingly profitable building companies are getting away with building fewer social housing units.	No suggested amendments made.	

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Intest) ATTENDING EXAMINATION
169/16/DM3/LC/US1&4	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Development Management DPD	Chapter 05	DM 03	N/A	LC	US/1 US/4	Our ongoing concern with this policy is that Policy DM3 repeats that up to 40% affordable housing will be required from large new residential development on greenfield sites. We consider this requirement will affect the viability of development and will stail development on many of the sites identified in the Local Plan. The target of 40% does not appear to be based on up-to-date evidence and has not been justified. The Council acknowledge this and have instructed a new housing needs study and viability assessment.  As worded Policy DM3 does not provide sufficient flexibility and fails to accord with the NPPF, the policy is therefore unsound and recommends that no affordable housing requirements are included until an up-to-date viability study has been published and critiqued by developers. At the very least the policy should be clarified to emphasise that the affordable housing requirements are targets and subject to negotiation.	We request that the affordable housing requirement is based on up-to-date evidence and reduced from the present 40% in the interest of positive preparation.	Yes
169/32/DM3/LC/US1-4	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Development Management DPD	Chapter 05	DM 03	N/A	LC	US/1 US/2 US/3 US/4	Our primary concern remains the affordable housing element of this policy which continues to suggest that 40% of affordable housing will be required from large new housing developments. We consider this requirement will affect the viability of many greenfield sites and as a result will stail development. This in turn will have an impact on the effectiveness of the Local Plan. [Further detail provided in the representors full response.]	We request that the affordable housing requirement set out in the DM DPD should be based upon an up-to-date evidence base for Bairrigg Garden Village and certainly reduced from the 40% currently indicated. The evidence base used to support this onerous requirement is not justified. At the very least Policy DM3 should be clarified to emphasise that the affordable housing requirements are targets which are subject to negotiation.	Yes
005/01/DM3/5.34/LC/US4	Charles Ainger	Lune Valley Community Land Trust	Development Management DPD	Chapter 05	DM 03	5.34	LC	US/4	Paragraph 5.34 can be misleading and is not up to date with latest policy. It says that all affordable housing must be delivered in partnership with registered providers; there are exceptions to this when it is delivered by a community led housing organisation, as the DPD confirms in paragraph 5.92.	(i) paragraph 5.34, insert in line 4 after 'specialist companies'. '...Also, this requirements does not apply to community led developments, complying with Policy DM12, as stated in paragraph 5.92.'	No
044/01/41/NLC/US1-4	Janet Taylor	N/A	Development Management DPD	Chapter 05	DM 03	5.41	NLC/5	US/1 US/2 US/3 US/4	The Council intend to bring forward a Supplementary Planning Document setting out a viability protocol which will provide detailed guidance on how site specific viability matters will be addressed. This will include a requirement that genuine site abnormalities and acceptable evidence submitted for viability appraisal will not include the cost of studying and mitigating flood risk from all sources and of all types where the site is identified from the start in the Plan as having flood risk. Developers will be expected to have assessed such risks and their costs at an early stage and planned their site development viability and land pricing to accommodate them.	Change the wording of the last viability paragraph in Policy DM3 to match match the changes in paragraph 5.41	Yes
124/07/DM3/LC/US1-4	Michael Gilbert	Peter Brett Associated on behalf of Hurstwood Holdings	Development Management DPD	Chapter 05	DM 03	N/A	LC	US/1 US/2 US/3 US/4	We welcome the Council's recognition that affordable housing provision should be subject ot an analysis of viability, particularly in the context of brownfield sites which invariably involve abnormal costs that need to be taken into consideration.  The supporting text in paragraph 5.38 also confirms that the Vacant Building Credit will be applied in line with national guidance, although there is no mention of this in the policy itself which we consider should be rectified for consistency.	Clarification should be provided in paragraph 5.38 in relation to Vacant Building Credit.	Yes
162/04/DM3/LC/US1-4	Graham Love	Smith & Love Planning on behalf of Applethwaite Homes	Development Management DPD	Chapter 05	DM 03	N/A	LC	US/1 US/2 US/3 US/4	As a specialist developer of small / medium sites our client is disappointed by the lack of flexibility in Policy DM3, particularly given past comments on this matter. As the draft revisions to national planning policy and guidance which indicate that planning authorities and developers will be encourage to avoid undertaking further viability assessment it is critical that relevant development management and site allocation policies offer sufficient flexibility for all developers from the outset.  As a developer serving a housing market for older people, particularly through the development of bungalows, which facilitate downsizing, our client should not be penalised and prevented from developing by the imposition of excessive and inflexible affordable housing requirements and related development standards. [Further detail provided in the representors full response.]	Policy DM3 should be reworded to recognise that bungalow developments cannot be expected to offer the same as potential mainstream housing in terms of affordable housing and other planning obligations as a matter of principle and without expecting an applicant to have to comply as a matter of principle.	
100/02/DM3/LC/US1-4	David Barnes	Star Planning on behalf of Seemore Properties Ltd	Development Management DPD	Chapter 05	DM 03	N/A	LC	US/1 US/2 US/3 US/4	Seemore Properties acknowledge that residential schemes should seek to deliver a proportion of affordable homes, and potentially up to 40% on greenfield sites may be appropriate. However, there is an absence of up-to-date supporting evidence which confirms the deliverability of this requirement, including on strategic site. As a result, whilst there may be an assessment of housing need, there is no evidence to justify that the proposed housing requirements are deliverable.	Flexibility concerning affordable housing provision based upon viability considerations.	Yes
163/18/DM3/LC/US2	David Diggle	Turley on behalf of Peel Holdings Investments	Development Management DPD	Chapter 05	DM 03	N/A	LC	US/2	The Council are yet to undertake a viability appraisal of the plan, given the lack of evidence it is considered premature to identify the specific level of affordable housing provision.  Peel consider that the proposed requirement of 40% for the Garden Village is overly onerous given the infrastructure issues which need to be addressed. Whilst affordable housing provision is important, it must be carefully balanced alongside other infrastructure requirements. In this regard, the level of affordable housing provision must be reconsidered in light of up to date viability evidence and infrastructure Delivery Plan for the district.  Peel does welcome the acknowledgement in Policy DM3 that affordable housing requirements will be applied flexibly where they may have a negative impact on viability.	That viability evidence should be completed and the affordable housing requirement in the Plan is revised to reflect up-to-date evidence.	Yes
030/06/DM3/NLC/US2-4	Helen Binns	Walsingham Planning on behalf of KCS Development Ltd	Development Management DPD	Chapter 05	DM 03	N/A	NLC/5	US/2 US/3 US/4	Whilst my client welcomes the acceptance in this policy that there may be circumstances where for reasons of viability the amount or mix of affordable housing can be reviewed, objection is raised to the requirement to provide a greater proportion of affordable housing on greenfield sites as compared to brownfield sites. It is considered that the proportion of affordable homes should be the same regardless of whether it is a brownfield or greenfield site.	In order to make the policy sound it should be amended to require the same level of affordable housing on both greenfield and brownfield site. The affordable housing requirements should be set at 30% rather than 40% of total units.	No
128/10/DM3/LC/US1-4	Aqub Saghir	NIL Consulting on behalf of Persimmon Homes	Development Management DPD	Chapter 05	DM 03	N/A	LC	US/1 US/2 US/3 US/4	Persimmon Homes support the provision of affordable homes in all new developments provided that it does not constrain deliverability and viability. There have been no changes proposed to the affordable housing provision required by the Council since the last iteration of the plan. Persimmon feel this is unnecessarily high and no justification or evidence has been provided for the figures used.  The plan should take into account draft NPPF paragraph 65 which looks for at least 10% of homes to be available for affordable homes. The Council should follow a similar approach, setting a high requirement as a starting point will only prevent further development and not encourage developers to bring forward sites.  The incorporation of viability in the context of development within this policy is supported. The inclusion of this point should not be seen as justification by the Council to have a higher starting point for provision of affordabl homes within the Plan. We also have concerns that the LPA setting the land value for the area would have implications for the delivery of housing. [Further detail provided in the representors full response.]	The affordable housing requirements should be reduced to reflect emerging guidance from the draft NPPF.	No
051/23/DM4/LC/5	Dan Mitchell	Barton Willmore on behalf of H2D Urban LLP	Development Management DPD	Chapter 05	DM 04	N/A	LC	5	Supportive of the Council's approach for development outside of the main urban areas.	No suggested amendments made.	Yes
106/25/DM4/LC/5	Craig Barnes	Barton Willmore on behalf of Storey Homes	Development Management DPD	Chapter 05	DM 04	N/A	LC	5	This policy ehances the effectiveness of the Local Plan by providing guidance for development proposals situated in settlements which are not otherwise identified as sustainable within the settlement hierarchy. Our client welcomes the additional guidance is welcome although this does not overcome our concerns over the distribution of development identified in Policy SP2.	No suggested amendments made.	Yes
054/15/DM4/44-46/LC/US2-4	Chris Garner	Garner Planning on behalf of Russell Armer Ltd	Development Management DPD	Chapter 05	DM 04	44 - 46	LC	US/2 US/3 US/4	Paragraph 5.44 - the explanatory text undermines the policy which allows development to come forward in or on the edge of rural sustainable settlements. Paragraph 5.45 - Proposals in or on the edge of sustainable rural settlements on sites which are not allocated in the Local Plan will need to comply with all planning policies and there should be no additional requirement to demonstrate the exceptional nature of such proposals. Paragraph 5.46 - It is not clear that the SHMA establishes housing need in individual sustainable rural settlements.	Delete paragraphs 5.44, 5.45 and 5.46.	Yes
128/12/DM4/LC/US1-4	Aqub Saghir	NIL Consulting on behalf of Persimmon Homes	Development Management DPD	Chapter 05	DM 04	N/A	LC	US/1 US/2 US/3 US/4	Policy DM4 is supported, however the Council must provide clarity and identify the amount of development expected in these areas identified within this policy.	Policy DM4 should identify the levels of development expected in rural areas.	No
010/03/DM4/LC/US2	David Dunlop	Wildlife Trust for Lancashire, Manchester & North Merseyside	Development Management DPD	Chapter 05	DM 04	N/A	LC	US/2	Following representations made on Policy DM1 of this DPD, amendments have been made to reflect the impacts of new housing of the natural environment. However, Policy DM4 has not been similarly amended. This is inconsistent within the wider plan and is not justified. The natural environment is not of demonstrably lesser intrinsic value when 8 happens to occur and survive outside of main urban areas of the district.	We suggest the following amendment to Policy DM4 to state 'Are located where the natural environment, services and infrastructure can or could be made to accommodate the impacts of development in accordance with other relevant policies, in particular Policy DM43'.  This will provide greater consistency with the wider plan.	Yes
078/01/DM4/LC/US1-2	Peter Shannon	WYG on behalf of Drinkwater Mushrooms	Development Management DPD	Chapter 05	DM 04	N/A	LC	US/1 US/2	Policy DM4 provides policy for managing residential development outside urban area and although it covers a number of possible of types of rural development it does not provide direction for the redevelopment of rural brownfield and redundant farm units. This is an omission that should be addressed. [Further detail provided in the representors full response.]	Policy to support the redevelopment of rural brownfield and redundant agricultural units should be added to Policy DM4	Yes
106/26/DM5/LC/5	Craig Barnes	Barton Willmore on behalf of Storey Homes	Development Management DPD	Chapter 05	DM 05	N/A	LC	5	Our client is supportive of this policy. The policy will enhance the effective by providing greater scope for local housing needs to be addressed over the plan period.	To align with national planning policy, the Council should make sure that Policy DM5 is also applicable to sites in the Green Belt consistent with paragraph 89 of the NPPF.	Yes
054/16/DM6/LC/US2-4	Chris Garner	Garner Planning on behalf of Russell Armer Ltd	Development Management DPD	Chapter 05	DM 06	N/A	LC	US/2 US/3 US/4	There is no evidence that 50% affordable housing is viable. There should be no on-site affordable housing requirement for schemes of 10 or less dwellings.	Delete reference to 50% and indicate on-site affordable housing will only be sought on schemes of more than 10 dwellings.	Yes
148/15/DM7/LC/US1-4	Jon Power	CBRE on behalf of Lancaster University	Development Management DPD	Chapter 05	DM 07	N/A	LC	US/1 US/2 US/3 US/4	The University has significant concerns with Policy DM7. It is the University's view that the policy as currently drafted does not carry sufficient policy weight to require an assessment of student residential proposals on non-allocated sites against an appropriate demand / need position. The introductory text to this policy provides a limited acknowledgement of the Council's intention to undertake a demand / need based approach to supporting new student accommodation. [Further detail provided in the representors full response.]	The University strongly recommend that the current policy is redrafted to ensure that applications for student accommodation outside of the defined University Campus and not benefitting from an allocation must demonstrate sufficient basis for need / demand. Developers should also be required to demonstrate that they have entered into some formal agreement with the University for the supply of all or some of the bed spaces and proposals for purpose built accommodation are fundable and deliverable.  Detailed amended wording for this policy is provided within the representors full response.	Yes
162/05/DM8/LC/US1-4	Graham Love	Smith & Love Planning on behalf of Applethwaite Homes	Development Management DPD	Chapter 05	DM 08	N/A	LC	US/1 US/2 US/3 US/4	We support the inclusion of this policy but, as with Policy DM3, it is overly prescriptive and too restrictive.	A much more simplified and less onerous version of this policy is needed, offering greater flexibility and recognising the full range of types of accommodation suited to retired and older people.	
122/14/DM1/LC/5	Tim Bettany - Simons	Canal and River Trust	Development Management DPD	Chapter 05	DM 11	N/A	LC	5	The Trust welcomes the thrust of this policy and that the Council are looking to support new moorings, however the Trust do have concerns in terms of how the policy is currently drafted.  It is unclear how residential moorings / houseboats have been identified within a housing needs assessment. It is unclear how the 8 additional permanent moorings have been arrived at particularly given the recent closure of Canforth Marina. The policy should be amended to allow for each proposal to be considered on its own merits.  With regard to criteria i, the provision of refuse and sewerage disposal is a reasonable expectation, however the policy reads as if new facilities (including toilets, showers, laundry plus re-fueling would be required for each mooring site. This is a substantial requirement and the criteria should be amended to provide a more flexible approach.  With regard to criteria iv, providing parking can often prove difficult when identifying new mooring sites. The Trust issues site rules which include terms and conditions at its mooring sites which can be used to restrict occupants from having a car, this could entirely remove the requirement for parking within the Local Plan and could be referred to in the supporting text.	The beginning of the policy 'to meet evidenced and identified needs' should be deleted.  Criteria ii should be amended to read 'It can be demonstrated that appropriate facilities and servicing is provided either on site or in close proximity to the site including...and re-fueling facilities.'  The supporting text should be expanded to clarify that in relation to criteria iv, this is only relevant if parking is to be provided / required for the mooring.	No
051/24/DM12/LC/US2	Dan Mitchell	Barton Willmore on behalf of H2D Urban LLP	Development Management DPD	Chapter 05	DM 12	N/A	LC	US/2	Whilst our client is in principle supportive of an element of self, custom and community led housing/build, it is noted that based on the latest evidence that there is limited demand within the district for self and custom build houses, and that demand is based on the plus-plus bedrooms. It is therefore unclear where the 'evidenced demand' for these type of properties are derived from.	Further clarification required in relation to evidenced demand.	Yes
155/08/DM12/LC/5	Paul Nellist	HOW Planning on behalf of Taylor Wimpey	Development Management DPD	Chapter 05	DM 12	N/A	LC	5	Taylor Wimpey support the specific wording of Policy DM12 to 'encourage' rather than 'require' serviced plots and would not support a policy requirement for serviced plots for self, custom or community led housing on Strategic Sites if it threatened the viability and / or deliverability of the site.	No suggested amendments made.	Yes
005/02/DM12/5.92/LC/US4	Charles Ainger	Lune Valley Community Land Trust	Development Management DPD	Chapter 05	DM 12	5.92	LC	US/4	In paragraph 5.92, reference is made to the Council's receipt of an allocation of Community Housing Fund Grant and says it will support, and provide funding, to community groups from this. The paragraph does not mention the new Government policy announced in November 2017 which allocated another 4 years of funding as a rate of £80m per year. This will be allocated centrally by Homes England. To be consistent in its support for community groups the Council should extend its support to such groups when they apply to Homes England.	(i) paragraph 5.92, insert following, in line 6 after "...by Cabinet in August 2017"... 'Lancaster City Council may also work directly with, and encourage and support, community groups seeking funding from the £240 Million Community Housing Fund for 2018/19 to 2021/22, administered centrally by Homes England.'	No
198/02/DM14/NLC/US1-3	Mark Aylward	ATP on behalf of Derwent Holdings	Development Management DPD	Chapter 06	DM 14	N/A	NLC/5	US/1 US/2 US/3	With referal to the section concerned with the loss of allocated employment land, we do not consider that this is currently sound. The tree bulleted criteria do not appear to expressly consider the scenario where an allocated employment site might be proposed for an alternative development. [Further detail provided in the representors full response.]	Additional clarity should be provided to Policy DM14 to ensure that the Plan is effective and capable of responding to market signals and emerging evidence base.	Yes
160/04/DM14/LC/US2-3	David Adams	Axis PED Ltd	Development Management DPD	Chapter 06	DM 14	N/A	LC	US/2 US/3	We would suggest that the current wording of Policy DM14 is not sufficient clear and effective. We support the recognition that appropriate sui generis uses can complement and give rise to similar impacts / benefits as traditional B type employment uses. Clarification is required from the start of the policy where it refers to new employment premises.  Criteria VI, VII and VIII set out where proposals that involve the use of employment land for alternative uses will be permitted. It is considered that criteria VIII is not sufficiently clear in how an applicant would be required to demonstrate the benefits of their proposal and how they outweigh the loss of the site for employment purposes. [Further detail provided in the representors full response.]	Local Plan policies should help deliver development and facilitate employment. The redevelopment of Lancaster West Business Park and the Heysham Gateway is clearly a strategic policy for the Council. It is considered that criteria VIII should be amended to provide greater clarity on the use of the term 'clearly demonstrated' and to reflect that the re-use of allocated employment land can meet other wider regeneration objectives, such as those set out in the Minerals and Waste Plan.	Yes
160/04/DM14/LC/US2-4	David Adams	Axis PED Ltd	Development Management DPD	Chapter 07	DM 15	N/A	LC	US/2 US/4	We would suggest that the current wording of Policy DM14 is not sufficient clear and effective. We support the recognition that appropriate sui generis uses can complement and give rise to similar impacts / benefits as traditional B type employment uses. Clarification is required from the start of the policy where it refers to new employment premises.  Criteria VI, VII and VIII set out where proposals that involve the use of employment land for alternative uses will be permitted. It is considered that criteria VIII is not sufficiently clear in how an applicant would be required to demonstrate the benefits of their proposal and how they outweigh the loss of the site for employment purposes. [Further detail provided in the representors full response.]	Local Plan policies should help deliver development and facilitate employment. The redevelopment of Lancaster West Business Park and the Heysham Gateway is clearly a strategic policy for the Council. It is considered that criteria VIII should be amended to provide greater clarity on the use of the term 'clearly demonstrated' and to reflect that the re-use of allocated employment land can meet other wider regeneration objectives, such as those set out in the Minerals and Waste Plan.	Yes
148/16/DM14/LC/US1	Jon Power	CBRE on behalf of Lancaster University	Development Management DPD	Chapter 06	DM 14	N/A	LC	US/1	The University comments that in defining employment generating uses into B1, B2, B8 and appropriate sui-generis uses does not acknowledge the range of alternative non-Class B employment uses that provide significant employment opportunities.	A broader range of uses should be acknowledged as capable of delivering employment in line with the NPPF Glossary.	Yes
124/08/DM14/LC/US1-4	Michael Gilbert	Peter Brett Associated on behalf of Hurstwood Holdings	Development Management DPD	Chapter 06	DM 14	N/A	LC	US/1 US/2 US/3 US/4	We are generally supportive of the principles set out in Policy DM14 and, as we have previously highlighted, the Lune Industrial Estate is clearly not capable of satisfying this policy and therefore its continued use for employment cannot be supported. [Further detail provided in the representors full response.]	No suggested amendments made.	Yes
169/17/DM16/LC/US4	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Development Management DPD	Chapter 07	DM 16	N/A	LC	US/4	We request that Policy DM16 is revised to reflect the role of any newly designated district centre at Bairrig Garden Village and the nature of such uses within such centres. This would ensure that the DPD is positively prepared and sound in the context of CEPs longstanding proposals for a district centre at Scoffthorpe Road.  We note the thresholds for impact assessments and request clarity in the wording (see representors full response). The NPPF directs town centre uses towards designated centres and require development to first demonstrate compliance within an impact test is therefore counterproductive and contrary to national planning policy.	To ensure soundness of the DPD, CEP request the element of the policy relating to impact assessments to be omitted prior to the examination. Should this element be retained then it should be updated to relate to district centre provision.	Yes

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Intent) ATTENDING EXAMINATION
163/19/DM18/LC/5	David Diggle	Turley on behalf of Peel Holdings Investments	Development Management DPD	Chapter 07	DM 18	N/A	LC	S	The Garden Village is referred to within Policy TCL as an urban local centre, Peel notes that Policy DM38 identifies that within local centres the Council will allow commercial, community and other non-residential uses on ground floors. Peel support the inclusion of a significant centre within the Garden Village but consider that this should be a District Centre rather than a Local Centre Scale.	That the centre in Baitrigg Garden Village is identified as a District Centre rather than a Local Centre.	Yes
050/16/DM21/LC/54	Emily Hrycan	Historic England	Development Management DPD	Chapter 07	DM 21	N/A	LC	US/4	Listed buildings and other heritage assets are subject to the requirements of the 1990 Act and NPPF when determining planning applications. Therefore, for clarity, the plan should ensure it clearly states that for applications for advertisements and shopfronts on listed buildings this will require listed building consent.	The plan should be amended to either expand Bullet Point I to make reference to the need for listed building consent or delete reference to listed buildings in Bullet Point I.	
190/03/DM22&DM23&DM24/LC/US3	Michael Mumford	Lancaster and Morecambe Liberal Democrats	Development Management DPD	Chapter 08	DM 22 DM23 DM 24	N/A	LC	US/3	There is a major absence in the document of reference to the Eden project on Morecambe seafront. There are perhaps good reasons why the local plan cannot make any reference to this because of uncertainties yet to be resolved. However the project is likely to be the most important development in the area for a century in terms of visitor numbers, traffic flows, jobs and economic impact.	No suggested amendments made.	
148/17/DM23/LC/US1	Jon Power	CBRE on behalf of Lancaster University	Development Management DPD	Chapter 08	DM 23	N/A	LC	US/1	Policy DM23 as currently drafted directs hotel development towards city centre locations in accordance with the NPPF. However, the University considers there are locationally specific opportunities for appropriate visitor accommodation outside of the city centre where linked to the University Campus, for example Forrest Hills.	The Forrest Hills site should be considered for its opportunity to provide locationally specific hotel facilities.	Yes
050/17/DM24/LC/5	Emily Hrycan	Historic England	Development Management DPD	Chapter 08	DM 24	N/A	LC	S	We welcome the inclusion of this policy in particular reference to securing the future of heritage assets through its conservation and enhancement.	No suggested amendments made.	
185/02/DM24/NLCS/US1&3&4	Maggie Taylor	Sport England	Development Management DPD	Chapter 08	DM 24	N/A	NLC/5	US/1 US/3 US/4	Sport England object to Policy DM24 on the basis that the policy does not include scope for sport and recreation, the Playing Pitch Strategy whilst being prepared was not completed and there is no Built Facility Strategy, therefore the policy was not underpinned by robust evidence base in light of the NPPF paragraph 73 and 96.  Whilst Sport England welcomes the Open Space Study and Playing Pitch Strategy (PPS) preparation, in terms of playing pitch matters the policy as written does not reflect the recommendations and actions from the PPS. Sport England would expect the PPS issues to be summarised and key recommendations highlighted within the policy.  The policy is also a little confusing as it is entitled 'Open Space, Sport and Recreation' but the sub-titles only refer to open space - it is not clear whether open space is being used as an embracing term.  The policy refers to the Local Plan policies map which identifies a range of designated open spaces, does this include all playing fields identified in the PPS and on school sites. If it does not these sites will not be regarded as 'designated' and the first part of the policy may not apply?  The creation of new recreational open space and sport should be informed by the PPS strategy and action plan, this should be referenced in the policy. Reference to health and safety should be added. [Further detail provided in the representatives full response.]	The policy should contained greater reference and linkages to the findings of the Playing Pitch Assessment. Further work is required in relation to a Built Facility Strategy.	No
074/03/DM24/LC/5	Tom Clarke	The Theatre Trust	Development Management DPD	Chapter 08	DM 24	N/A	LC	S	The trust supports this policy and welcomes that it requires demonstration of not being required by local community and not just that it has become economically unviable.	No suggested amendment made.	No
163/20/DM26/LC/5	David Diggle	Turley on behalf of Peel Holdings Investments	Development Management DPD	Chapter 08	DM 26	N/A	LC	S	Peel notes the content of Policy DM26. The provisions of this policy should be applied flexibly in the context of wider benefits, costs and development viability.	No suggested amendments made.	Yes
051/25/DM27/LC/54	Dan Mitchell	Barton Willmore on behalf of H2O Urban LLP	Development Management DPD	Chapter 08	DM 27	N/A	LC	US4	Our client is supportive of the principle of this policy, however it is noted that the Council are undertaking a Open Space Assessment and Playing Pitch Assessment which should have been published prior to publication.  When taking account of the requirements of Policy DM27 (and associated appendices) in relation to strategic sites such as South Camforth this may result in any future scheme being unviable without a further release of land to accommodate open space provision. Equally, it is unknown whether the Council has undertaken any spatial testing of allocations to demonstrate that such provision can physically fit on the site along with all other requirements.  It is noted that contributions are required for maintenance sums and a management plan to be provided. These requirements are onerous on a development and may result in a scheme being unviable. This should be tested through a viability appraisal.	No suggested amendments made.	Yes
106/27/DM27/LC/US2	Craig Barnes	Barton Willmore on behalf of Storey Homes	Development Management DPD	Chapter 08	DM 27	N/A	LC	US/2	Our client acknowledges the open space requirements for new development as set out in Policy DM27 and Appendix D of the DPD. In order to ensure that open space provision adequately reflects local need, the Council must ensure that its appraisal of existing open space is kept up-to-date over the duration of the plan period.	It is noted that the Council's existing Open Space Assessment is 2010 and is considered out of date. The Council should look to review this document ahead of Public Examination.	Yes
100/03/DM27/LC/5	David Barnes	Star Planning on behalf of Seemore Properties Ltd	Development Management DPD	Chapter 08	DM 27	N/A	LC	S	The principle of the creation of a new country park as part of the East Lancaster Strategic Site is supported. Such extensive areas of open space will provide effective mitigation for any potential recreational pressure on European Designated Sites. However, such open space does come at a cost.	No suggested amendments made.	Yes
163/21/DM27/LC/5	David Diggle	Turley on behalf of Peel Holdings Investments	Development Management DPD	Chapter 08	DM 27	N/A	LC	S	Peel welcomes the aspirations of Policy DM27, to ensure that new development incorporate appropriate recreational open space provision. It is considered that the principles and parameters of such provision in the Garden Village will be established by the prearation of the masterplan and site specific policy.	No suggested amendments made.	Yes
106/28/DM28/LC/US3	Craig Barnes	Barton Willmore on behalf of Storey Homes	Development Management DPD	Chapter 09	DM 28	N/A	LC	US/3	In principle our client supports the aims of this policy to enhance the skill level of the local population and the promotion of opportunities for skill development of local people on construction schemes. Given the complexity of development and need to ensure that timescales for development can be adhere to, it may not be suitable for local skills and training opportunities to be provided for each site every time. Furthermore it is not clear how the Council intend to monitor and enforce the requirements of this policy.	Our client believes that the Council should seek to encourage local skills and training within major developers, with applications committing local skills training treated more favourably within the planning balance.	Yes
190/04/DM28/LC/US3	Michael Mumford	Lancaster and Morecambe Liberal Democrats	Development Management DPD	Chapter 09	DM 28	N/A	LC	US/3	The development of education, employment and skills is key, but Chapter 9 of the Development Management DPD says very little on the matter. The major need is for liaison between the Lancaster & Morecambe College, as the main local provider of vocational education and employers.	No suggested amendments made.	
163/22/DM28/LC/5	David Diggle	Turley on behalf of Peel Holdings Investments	Development Management DPD	Chapter 09	DM 28	N/A	LC	S	Peel notes the content of Policy DM28 and supports paragraph 9.3 which seek to ensure development is not overburdened. The provisions of this policy should be applied flexibly in the context of wider benefits, costs and development viability.	No suggested amendments made.	Yes
051/26/DM29/LC/US1	Dan Mitchell	Barton Willmore on behalf of H2O Urban LLP	Development Management DPD	Chapter 10	DM 29	N/A	LC	US/1	Whilst our client is largely supportive of this approach, we have concerns with the need to engage in discussions with Design Panels, to assess the impact at pre-application stage. Further clarification is required in relation to these.	No suggested amendment made.	Yes
167/16/DM29/LC/US3	Hannah Walker	Barton Willmore on behalf of SCP Consulting Ltd	Development Management DPD	Chapter 10	DM 29	N/A	LC	US/3	In principle, our client supports the need to achieve high quality design, however many of the requirements in this policy are repetitions of other policies elsewhere in the plan.	To create a more legible policy and reduce excessive policy burdens, we consider that repetition should be removed from the policy.	Yes
106/29/DM29/LC/US2-3	Craig Barnes	Barton Willmore on behalf of Storey Homes	Development Management DPD	Chapter 10	DM 29	N/A	LC	US/2 US/3	Our client is largely supportive of this policy and acknowledge that design plays a key role in securing sustainable development. Our client is concerned by the role of Design Panels within the planning application process in relation to major development and the use of their recommendations in the decision making process.  Little explanation is provided within the Local Plan as to what Design Panels are and when they will be required. It is therefore unclear why Policy DM29 attaches such a role for them in the planning process and what their value will be.	Our client suggests that the most effective approach for this to be secured is via the Council's pre-application service. This way the Council can define how design panel is populated, provide appropriate levels of training and control the type of input sought. The adoption of this approach will ensure that delays are minimised.	Yes
148/18/DM29/LC/5	Jon Power	CBRE on behalf of Lancaster University	Development Management DPD	Chapter 10	DM 29	N/A	LC	S	The University is supportive of high quality design and supports new development being accessible from a range of transport modes and sustainably located. The development of the Garden Village needs to be coordinated to ensure the quality of design, layout and green / blue infrastructure is safeguarded and enhanced. The University considers that not only large-scale proposals but sites in sensitive locations should be sent to Design Panel for review to maintain high standards of design.	No suggested amendments made.	Yes
148/19/DM29/LC/5	Jon Power	CBRE on behalf of Lancaster University	Development Management DPD	Chapter 10	DM 29	N/A	LC	S	Whilst the University promote Lancaster City Centre as an attractive place for students and staff to live and work, the University support the Council's desire to reduce levels of air pollution and improve the quality of the environment.	No suggested amendments made.	Yes
054/17/DM29/LC/US2-4	Chris Garner	Garner Planning on behalf of Russell Armer Ltd	Development Management DPD	Chapter 10	DM 29	N/A	LC	US/2 US/3 US/4	Electric charging points should not be a policy requirement.  If the authority intend local Design Panels to review all major development proposals as pre-application stage, then the authority should set out what local design review arrangement they have made to assess such applications.	Delete criteria XVIII.  Delete "Where major developments...decision making process." regarding design panels.	Yes
128/13/DM29/LC/US1-4	Aqub Saghir	NIL Consulting on behalf of Persimmon Homes	Development Management DPD	Chapter 10	DM 29	N/A	LC	US/1 US/2 US/3 US/4	This policy makes reference to the use of Design Panels for major applications and this is not supported. This requirement does not provide flexibility and can often delay deliverability. The Council should also provide clear justification for the design principles proposed within the justification and supporting evidence base.	The requirement for design panels should be removed from Policy DM29.	No
100/04/DM29/LC/US1-4	David Barnes	Star Planning on behalf of Seemore Properties Ltd	Development Management DPD	Chapter 10	DM 29	N/A	LC	US/1 US/2 US/3 US/4	There is little explanation within the Local Plan as to what the role of the design panel is to be and whether the 'due considerations' of such a panel will carry any weight in the determination of planning applications. It is also unclear whether such panels will fit into the Development Brief process which would add concerns about further delay to the process.  Promoting high quality design is not objectional to Seemore Properties, however some of the matters identified are not clear in what is being either sought or abdicated as responsibility for other documents to determine. For example, what amount of net gain in Green Infrastructure on a greenfield site in the Local Plan? Also what type of electric charging points would be required? There is concern that SPDs may well be used to introduce new policy requirements would ought to be included in the Local Plan and tested at examination.	Clarify the status of Design Panels. Identify the SPDs that are really necessary and ensure that any policy considerations are contained within the Local Plan.	Yes
163/23/DM29/LC/5	David Diggle	Turley on behalf of Peel Holdings Investments	Development Management DPD	Chapter 10	DM 29	N/A	LC	S	Peel notes the content of Policy DM29. The provisions of this policy should be applied flexibly in the context of wider benefits, costs and development viability.	No suggested amendments made.	Yes
010/04/DM29/LC/US3-4	David Dunlop	Wildlife Trust for Lancashire, Manchester & North Merseyside	Development Management DPD	Chapter 10	DM 29	N/A	LC	US/3 US/4	The trust considers that the requirements in this policy under the heading 'other environmental considerations' should require the design of development to have regard to the ecology of the site and its surroundings. It is appreciated that this matter is covered in Policy DM43 so cross-referencing may suffice. The current wording relates only to anthropocentric green infrastructure and to a very narrow range of habitats and species.	We suggest that under the heading of 'other environmental considerations' the following text should be added 'to have regard to the ecology of the site and its surroundings, ecological networks within and outside the site, and to require the retention of existing features such as trees, hedges and water features as far as is practicable.'  Alternatively cross referencing to Policy DM43 would achieve similar compliance.	Yes
122/15/DM29/LC/5	Tim Bettany - Simons	Canal and River Trust	Development Management DPD	Chapter 10	DM 29	N/A	LC	S	The Trust consider that criteria XV of this policy could be usefully expanded and split into two criteria - one dealing with contamination and the other in relation to land stability.  The Trust consider that the structural integrity of our network and related infrastructure should be recognised, safeguarded and protected within this policy. [Further detail provided in the representatives full response.]	Further reference be provided in Policy DM29 in regard of recognising, safeguarding and protecting the structural integrity of the canal network.	No
051/27/DM30/LC/5	Dan Mitchell	Barton Willmore on behalf of H2O Urban LLP	Development Management DPD	Chapter 10	DM 30	N/A	LC	S	The policy seeks to ensure that development which is delivered is of a high standard of sustainable design and construction. In principle, our client supports this approach.	No suggested amendments made.	Yes
167/17/DM30/LC/5	Hannah Walker	Barton Willmore on behalf of SCP Consulting Ltd	Development Management DPD	Chapter 10	DM 30	N/A	LC	S	In principle our client supports the approach of Policy DM30, however our client notes that the Council intend to prepare further guidance which will expand on the principles of this policy.	No suggested amendments made.	Yes
054/16/DM30/LC/US2-4	Chris Garner	Garner Planning on behalf of Russell Armer Ltd	Development Management DPD	Chapter 10	DM 30	N/A	LC	US/2 US/3 US/4	There should be no additional measures required that go beyond Building Regulation requirements.	Delete the policy.	Yes
097/09/DM30/LC/5	Joanne Harding	Home Builders Federation	Development Management DPD	Chapter 10	DM 30	N/A	LC	S	The HBF is generally supportive of sustainable development and appreciates that this policy seeks to encourage sustainable design and construction, rightly recognising within the supporting text that energy efficiency in new housing is solely dealt with through Part L of the Building Regulations and should not be required through the planning process.	No suggested amendments made.	Yes
155/10/DM30/LC/US2	Paul Nellist	HOW Planning on behalf of Taylor Wimpey	Development Management DPD	Chapter 10	DM 30	N/A	LC	US/2	Taylor Wimpey seek to deliver high standards of sustainable design and construction throughout their housing schemes and therefore support the principle of Policy DM30. Notwithstanding this, Taylor Wimpey would not support a policy requirement for additional infrastructure or other measures on large housing sites if it threatened the viability and/or deliverability of the site.	There must be a mechanism to relax requirements of Policy DM30 if proved not to be viable.	Yes
169/18/DM30/LC/US3	Jonathan Wallace	Lutfields on behalf of Commercial Estates Projects	Development Management DPD	Chapter 10	DM 30	N/A	LC	US/3	We note that references to the requirement for a balance between sustainability measures and viability have been removed from DM30. However, CEP considers that it remains paramount that the Council acknowledge this requirement within the final policy text. As drafted DM30 has the potential to adversely affect the impact upon viability of development and jeopardise the effectiveness of the DPD.	That Policy DM30 is clarified to provide more reference toward development viability.	Yes
128/14/DM30/LC/US1-4	Aqub Saghir	NIL Consulting on behalf of Persimmon Homes	Development Management DPD	Chapter 10	DM 30	N/A	LC	US/1 US/2 US/3 US/4	Policy DM30 is considered to go further than that required by the Local Plan. As with Policy DM2, Building Regulations are continually being improved and ensure that there is a standard minimum of quality for new houses.	No suggested amendments made.	No
163/24/DM30/LC/5	David Diggle	Turley on behalf of Peel Holdings Investments	Development Management DPD	Chapter 10	DM 30	N/A	LC	S	In respect of Policy DM30, Peel would welcome recognition of the potential implications of sustainable design on the cost of development, where advantage are considered in balance with other planning objectives. Policy DM30 must be applied flexibly and in the context of wider benefits.	No suggested amendments made.	Yes
155/11/DM31/LC/US2-3	Paul Nellist	HOW Planning on behalf of Taylor Wimpey	Development Management DPD	Chapter 10	DM 31	N/A	LC	US/2 US/3	Policy DM31 sets out the Council approach to air quality management and minimising pollution. For development proposals in urban areas, this inclusion of solid fuel combustion is discouraged. Taylor Wimpey would not support any policy requirement if it threatened the viability and / or deliverability of development.	No suggested amendments made.	Yes
163/25/DM31/LC/5	David Diggle	Turley on behalf of Peel Holdings Investments	Development Management DPD	Chapter 10	DM 31	N/A	LC	S	Policy DM31 supports Policy EN11 in relation to air quality matters. Policy DM31 sets out a requirement for new development proposals to explore opportunities to delivery reductions in future air quality emissions, Peel support this proposal. The intention to prepare future guidance on this matter is supported which expands on these requirements, this guidance should be made available prior to the Examination.	Further guidance on these requirements should be prepared prior to Examination.	Yes
054/15/DM33/LC/US2-4	Chris Garner	Garner Planning on behalf of Russell Armer Ltd	Development Management DPD	Chapter 10	DM 33	N/A	LC	US/2 US/3 US/4	All land and property is in Zone 1, 2 or 3 defining the degree of risk by flooding, so to say that all proposals at risk of flooding must meet the six criteria is not appropriate. The policy should not seek to go beyond NPPF requirements for sequential and exception tests.	Refine the policy to comply with the NPPF or simply rely on the NPPF and delete the policy.	Yes
070/03/DM33/LC/US3	Dr Lesley Bryan	N/A	Development Management DPD	Chapter 10	DM 33	N/A	LC	US/3	Lancaster District has several areas which are vulnerable to flooding, including areas where local flooding occurs from a range of sources. There needs to be considerable improvement in documenting local flooding issues if informed decisions concerning future development are to be made. [Further detail provided in the representatives full response.]	Policy DM30 or DM31 should include a commitment to document surface water flooding issues which can then be used to inform the assessment of future development proposals.	No
044/02/DM33/NLCS/US1-4	Janet Taylor	N/A	Development Management DPD	Chapter 10	DM 33	N/A	NLC/5	US/1 US/2 US/3 US/4	As written paragraphs 10.31 to 10.35 are not sound because it under-represents the importance of the increasing surface water flood risk, and the implications that it has for the kind of site Flood Risk Assessment that must be done, costed, land priced and site viability assessment done. [Further detail provided in the representatives full response.]	Detail wording amendments have been provided within the representatives full response.	Yes
122/16/DM34/LC/5	Tim Bettany - Simons	Canal and River Trust	Development Management DPD	Chapter 10	DM 34	N/A	LC	S	No comment made.	The Trust consider that the supporting text could be usefully expanded to include reference to the potential discharge of surface water from sites into the canal.	No
155/12/DM34/LC/5	Paul Nellist	HOW Planning on behalf of Taylor Wimpey	Development Management DPD	Chapter 10	DM 34	N/A	LC	S	The wording of Policy DM34 allows for developers to provide alternative drainage systems where it has not been demonstrated that sustainable drainage systems are inappropriate or impracticable. Taylor Wimpey supports this aspect of the policy and would seek to ensure that this remains an integral part of Policy DM34.	No suggested amendments made.	Yes
044/03/DM34/NLCS/US1-4	Janet Taylor	N/A	Development Management DPD	Chapter 10	DM 34	N/A	NLC/5	US/1 US/2 US/3 US/4	Paragraphs 10.37 and 10.42 require modification to ensure their soundness.	Detail wording amendments have been provided within the representatives full response.	Yes
163/26/DM35/LC/5	David Diggle	Turley on behalf of Peel Holdings Investments	Development Management DPD	Chapter 10	DM 35	N/A	LC	S	Peel support the Council in their aim to improve water efficiency. Policy DM35 states that the design of non-residential development should enable the achievement of BREEAM excellent standard. This requirement should be applied flexibly and where practical in the context of wider benefits, costs and development viability.	No suggested amendments made.	Yes

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Insert) ATTENDING EXAMINATION
160/05/C10/LC/5	David Adams	Axis PED Ltd	Development Management DPD	Chapter 10	N/A	N/A	LC	S	It is considered that the policies contained within Chapter 10 of this DPD are in line with Section 7 of the NPFF requiring good design. The requirement for appropriate air quality mitigation is supported. [Further detail provided in the representatives full response.]	No suggested amendments made.	Yes
050/19/DM37/LC/US4	Emily Hrycan	Historic England	Development Management DPD	Chapter 11	DM 37	N/A	LC	US/4	<p>The policy should start with setting out what is expected in terms of listed buildings in line with the requirement of national policy and legislation which is to conserve and enhance elements that contribute to its significance. The section entitled 'demolition of listed buildings' covers substantial harm. Substantial harm is not just demolition and the policy would benefit from the removal of this title to ensure consistency and clarity for those submitting planning applications as it may lead to confusion in its current form.</p> <p>Historic England suggest wording changes to paragraph 2 of the policy to remove repetition. It is unclear why there is a separate section on extensions and alterations to listed buildings, which seems to suggest that applications for these works are a separate process to any other applications for listed buildings. When in fact extensions and alterations would be considered in the first half of the policy under the definition of a proposal and will be subject to the same tests and requirements as all other proposals. Suggesting alternative processes referring to adverse impact, dominant, distract etc would be part of process of understanding the buildings significance and the level of harm would not be subject of different requirements.</p> <p>Changes of use and conversions would again be covered under the beginning of the policy. Any changes of use and conversions need to be assessed with an understanding of the elements that would contribute to the significance of the heritage asset, ensuring it sustains and enhances it. The section on listed buildings and climate change needs to provide further clarity. In addition a section has been suggested which provides guidance on the information to be submitted with planning applications. [Further detail provided in the representatives full response.]</p>	Detailed wording amendments to Policy DM41 are provided within the representatives full response.	
050/20/DM38/LC/US4	Emily Hrycan	Historic England	Development Management DPD	Chapter 11	DM 38	N/A	LC	US/4	Historic England suggest changes to the ordering of the policy to provide a more logical approach to assisting those submitting applications affecting conservation areas. The special character and appearance of conservation areas are not just buildings and therefore, it is suggested that reference should be made to features and open spaces. The policy would benefit from a more positive response to applications which come forward which will preserve and enhance its special character and appearance. Reference is also suggested to the need to submit a heritage impact assessment / statement for all proposals.	Detailed wording amendments to Policy DM41 are provided within the representatives full response.	
106/30/DM39/LC/US4	Craig Barnes	Barton Willmore on behalf of Storey Homes	Development Management DPD	Chapter 11	DM 39	N/A	LC	US/4	Our client recognises the great weight attached to the preservation and conservation of heritage assets within national planning policy. Reviewing Policy DM39 our client considers there is need for some amendment to its wording. The first sentence advises that proposals which fail to preserve or enhance the setting of a designated heritage asset provides a policy position which is a higher bar than national planning policy, specifically paragraph 132. [Further detail provided in the representatives full response.]	The policy clearly diverges from the national approach in this regard without justification. Our client considers that the first sentence of the policy should be reworded in alignment with paragraph 132 of the NPFF.	Yes
050/21/DM39/LC/US4	Emily Hrycan	Historic England	Development Management DPD	Chapter 11	DM 39	N/A	LC	US/4	Some of the policy appears to be covered in other individual heritage asset policies. Paragraph 2 of the policy refers to the asset as well as the setting which is covered within other policies. Surely it is harm to the setting rather than a negative impact as referred to in paragraph 3. Whilst we support the steps identified, shouldn't these also be the steps that apply to all applications for heritage assets as well as their setting? For consistency the policy should make clear what assets this policy applies to as the term heritage assets is not used within individual policies and there may be some confusion in its application.	No suggested amendments made.	
100/05/DM39/LC/US1&2&4	David Barnes	Star Planning on behalf of Seemore Properties Ltd	Development Management DPD	Chapter 11	DM 39	N/A	LC	US/1 US/2 US/4	<p>Seemore Properties object to the wording of Policy DM39 as it is not consistent with national planning policy. Paragraph 132 of the Framework includes the approach toward the assessment of the effect of proposed development on heritage assets and their settings. Substantiation harm or loss of Grade II buildings, parks and gardens should be exceptional, with substantial harm to assets of greater importance wholly exceptional. Developments leading to substantial or loss should be refused unless it is demonstrated that this is required to achieve substantial public benefits.</p> <p>Policy DM39 is not consistent with national policy because it gives greater weight to the preservational and enhancement of the setting of heritage assets.</p>	The first sentence of the policy should be reworded to accord with national policy.	Yes
155/13/DM39-40/LC/5	Paul Nellist	HOW Planning on behalf of Taylor Wimpey	Development Management DPD	Chapter 11	DM 39 DM 40	N/A	LC	S	The information required to support a planning applications should be proportionate to the scale and importance of any heritage asset.	No suggested amendments made.	Yes
167/18/DM40/LC/5	Hannah Walker	Barton Willmore on behalf of SCP Consulting Ltd	Development Management DPD	Chapter 11	DM 40	N/A	LC	S	The requirements of Policy DM40 are largely consistent with the NPFF. Our client welcomes the clarification provided in relation to agricultural land.	No suggested amendments made.	Yes
100/06/DM40/LC/US1&2&4	David Barnes	Star Planning on behalf of Seemore Properties Ltd	Development Management DPD	Chapter 11	DM 40	N/A	LC	US/1 US/2 US/4	<p>Seemore Properties object to the wording of Policy DM40 as it is not consistent with national planning policy. Paragraph 132 of the Framework includes the approach toward the assessment of the effect of proposed development on heritage assets. This paragraph recognises that there is a clear gradation in significance of differing heritage assets and does not include the extreme type of protection sought by Policy DM40 concerning the loss of non-designated assets.</p> <p>In assessing planning application affecting non-designated assets, the Framework identifies that the significance of the asset should be taken into account in determining the application and a balanced judgement applied regarding the scale of any harm or loss of significance (para 135). What the Framework does not say is that there will be a presumption in favour of the retention of a non-designated heritage assets and that the loss of whole or part of such an asset will require clear and convincing justification.</p>	Policy DM40 requires re-drafting in a form which is consistent with paragraph 135 of the Framework with the existence of a non-designated heritage asset being put into the planning balance and not getting any greater weight beyond what is provided for in the Framework.	Yes
050/22/DM41/LC/US4	Emily Hrycan	Historic England	Development Management DPD	Chapter 11	DM 41	N/A	LC	US/4	Historic England suggest changes to Policy DM41 to ensure clarity and consistency with the NPFF and relevant legislation. The policy needs to provide a starting point on what is expected out of development proposals (i.e. they should conserve and enhance those elements that contribute to significance rather than by starting the policy with what is not permitted. It is also recommended that the policy deals with sites of less than national importance.	Detailed wording amendments to Policy DM41 are provided within the representatives full response.	
161/04/C11/LC/US3	Lucy Barron	Arnside & Silverdale AONB Partnership	Development Management DPD	Chapter 11	N/A	N/A	LC	US/3	There is no reference to the Arnside & Silverdale AONB within chapter 11, despite the historic character being a key component of the AONB landscape and there being a specific policy on the historic environment in the Arnside & Silverdale AONB DPD.	Reference should be made to the Arnside & Silverdale AONB within this chapter.	No
050/18/DM37-41/LC/US4	Emily Hrycan	Historic England	Development Management DPD	Chapter 11	N/A	N/A	LC	US/4	Historic England strongly object to this section of the plan. The district includes three Registered Parks and Gardens and yet the plan does not include a policy that will provide a framework to manage any development which will affect these types of heritage assets. Without this, there is the risk of harm to the future of these heritage assets. In view of this the plan does not meet the requirements of the NPFF.	The plan should be amended to introduce a policy on Register Parks and Gardens.	
161/05/DM43/LC/US3	Lucy Barron	Arnside & Silverdale AONB Partnership	Development Management DPD	Chapter 12	DM 43	N/A	LC	US/3	There is no reference to the Arnside & Silverdale AONB in Policy DM43, despite biodiversity being a key component of the AONB landscape and natural beauty and there being a relevant policy in the Arnside & Silverdale AONB DPD.	Reference should be made to the Arnside & Silverdale AONB within this Policy.	No
106/13/DM43/LC/US4	Craig Barnes	Barton Willmore on behalf of Storey Homes	Development Management DPD	Chapter 12	DM 43	N/A	LC	US/4	Our client is supportive of the aims of this policy. Our client however questions the Council's approach to Internationally and Nationally designated sites whereby the Council's policy response does not appear to adopt a hierarchical approach set by national planning policy.	The approach applied by the policy should be revised to give greater weight to the international designation in line with national planning policy.	Yes
369/19/DM43/LC/5	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Development Management DPD	Chapter 12	DM 43	N/A	LC	S	CEP welcomes and considers sound amendments which have been made to Policy DM43 whereby the onus of the policy has shifted towards minimising adverse impacts.	No suggestion amendments made.	Yes
163/27/DM43/LC/5	David Diggle	Turley on behalf of Peel Holdings Investments	Development Management DPD	Chapter 12	DM 43	N/A	LC	S	Peel agrees that a high quality ecological network is an important matter, but considers this issue should be identified as an objective rather than requirement. The principle should be instead to avoid adverse impact which would be consistent with the NPFF.	The delivery of a high quality ecological network should be a objective, not a requirement.	Yes
106/12/DM44/LC/US3	Craig Barnes	Barton Willmore on behalf of Storey Homes	Development Management DPD	Chapter 12	DM 44	N/A	LC	US/3	Our client is supportive of the aims of the Council to protect and enhance levels of trees, hedgerows and woodland in the district. However, our client is confused by the second part of Policy DM44 relating to encouraging tree and hedgerow cover. In our clients view this section does not make sense and should be revised.	It is believed that the Council is seeking to ensure that new developments make the best use of the opportunity to provide for new planting within their schemes, as such the policy should be revised to 'Applicants are encouraged to explore appropriate opportunities for the planting of...'	Yes
169/20/DM44/LC/US4	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Development Management DPD	Chapter 12	DM 44	N/A	LC	US/4	We note that no amendments have been made to Policy DM44 following previous concerns raised that the approach taken extends beyond the NPFF requirements without justifying such an approach.	We consider the first sentence of paragraph 1 of Policy DM44 be removed, however should it remain it should state 'where possible, avoid the removal of trees which positively contribute (either as individual specimens or as part of a wider group) to the visual amenity and environmental value of the locality unless the need for, and / or benefits of, the proposal clearly outweigh the loss.'	Yes
173/01/DM44/NLC5/US1-4	David Howard	N/A	Development Management DPD	Chapter 12	DM 44	N/A	NLC/5	US/1 US/2 US/3 US/4	Considers that the requirements sets out in the Lancaster City Council's Tree Policy (and Policy DM44) towards the ratio to replanting as being 3 new trees to every tree lost as unrealistic and absurd. The requirement appears to be without precedent or equal to any other authority in the UK.	No suggested amendments made.	No
167/19/DM45/LC/US1&4	Hannah Walker	Barton Willmore on behalf of SCP Consulting Ltd	Development Management DPD	Chapter 12	DM 45	N/A	LC	US/1 US/4	<p>Policy DM45 attaches great weight to the protection of nationally important landscapes such as AONBs. Our client has no objection to this part of the policy where it aligns with paragraphs 115 and 116 of the NPFF.</p> <p>Policy DM45 also deals with local landscape designations, whilst our client has no objection to the proposed designations, our client is concerned that the wording of the policy restricts any form of development in these areas. Any development within these designated areas will inevitably change the landscape character, however it is to what degree this is harmful and what mitigation can be provided.</p>	To be consistent with national planning policy, Policy DM45 should be amended to read 'New development within these designations will preserve and enhances the character and appearance of its surroundings and important natural features safeguarded...'	Yes
106/33/DM45/NLC/US3	Craig Barnes	Barton Willmore on behalf of Storey Homes	Development Management DPD	Chapter 12	DM 45	N/A	NLC	US/3	In applying this policy, the Council must ensure that, in common with Section 82 of the Countryside and Rights of Way Act 200, that in upholding the primary purpose the Council will take into account the needs of economic and social needs of local communities. Thus, if there is a clear public benefit of permitting development (i.e. community support or clear social / economic benefits) even if the proposal is major in form the Council should not refuse the development.	No suggested amendments made.	Yes
064/01/DM45/LC/US4	Richard Pearse	National Trust	Development Management DPD	Chapter 12	DM 45	N/A	LC	US/4	The National Trust is generally supportive of Policy DM45, however we are concerned that the policy does not go far enough in addressing the NPFF aim of protecting and enhancing valued landscapes, in particular their setting. Whilst Policy DM45 refers to the conservation and enhancement of protected landscape and its setting in regards to the AONB, this does not extend to local landscape designations. The setting of these areas is often as important as the areas themselves.	<p>Include additional text to the second sentence stating 'The intrinsic character of these designations, and the contributions that they make to the character and setting of urban areas, will be conserved and important natural features safeguarded, providing particular regard to the historic townscape of the urban areas.'</p> <p>Delete the words 'within these areas' from the start of the last sentence. We also request that the words 'within these areas' are also deleted from Policy EN7 for consistency.</p>	No
100/07/DM45/LC/US1-4	David Barnes	Star Planning on behalf of Seemore Properties Ltd	Development Management DPD	Chapter 12	DM 45	N/A	LC	US/1 US/2 US/3 US/4	Seemore Properties objection to Policy DM45 arises from representations concerning Policy EN7 (100/9). Further, the objection is also associated with the extent of the East Lancaster Strategic Site (Policy S67). Part of the Urban Setting Landscape which includes the agricultural buildings and associated land at Cuckoo Farm should be excluded from this designation. [Further detail provided in the representatives full response.]	Cuckoo Farm buildings and associated land should be excluded from the Urban Setting Landscape designation and included as part of the East Lancaster Strategic Site.	Yes
167/20/DM46/LC/5	Hannah Walker	Barton Willmore on behalf of SCP Consulting Ltd	Development Management DPD	Chapter 13	DM 46	N/A	LC	S	Our client welcomes the flexibility offered by this policy to deliver development in the open countryside and the revisions made to Policy DM46 making specific reference to this policy.	No suggested amendments made.	Yes
050/23/DM46/LC/US4	Emily Hrycan	Historic England	Development Management DPD	Chapter 13	DM 46	N/A	LC	US/4	<p>The policy as drafted encourages development in rural areas for conservation and enhancement of heritage assets. Any new development that affects a heritage asset will be expected to demonstrate that it conserves and enhances the elements which contribute towards its significant, including setting, and will meet the requirements of national policy and legislation.</p> <p>The policy appears to be trying to justify development which would not normally be acceptable. Any proposals for enabling development are normally contrary to policy and there are strict requirements for such proposals. In view of this reference to heritage should be deleted from this policy.</p>	Reference to heritage should be deleted from Bulet Point IV	
174/03/DM48/LC/US3&4	John Welbank	N/A	Development Management DPD	Chapter 13	DM 48	N/A	LC	US/3 US/4	The Local Plan holds on to an outdated sustainability assessment for residential development in rural areas and is out of touch with the realities of rural life due to local authority cuts. It takes no account of car ownership requirements. The Development Management DPD does not provide a simply barn conversion policy that mirrors other local authorities and meets the requirements of the NPFF. The existing and proposed policies are over complex and do not meet the needs of local residents.	The Development Management DPD needs to include a simple, positive policy relating to individual barn conversions. The buildings have to be structurally convertible, have reasonable access and design and siting needs to be appropriate.	
106/14/DM49/LC/US4	Craig Barnes	Barton Willmore on behalf of Storey Homes	Development Management DPD	Chapter 13	DM 49	N/A	LC	US/4	Our client notes the range of development types that will be permitted in principle by the Council in the Green Belt. Whilst this provides greater clarity on the types of development permitted in the NPFF, our client notes that the scope of this development is more limited than through national policy. Notable omissions from this policy include guidance relating to previously developed land, infill and rural exception affordable housing.	The proposed policy adopts an approach to development within the Green Belt which is more restrictive than the NPFF. The Policy should be revised accordingly.	Yes
028/05/DM51/LC/5	Janet Baguley	Natural England	Development Management DPD	Chapter 13	DM 51	N/A	LC	S	The HRA for the Plan has identified that an increase in recreational disturbance to Morecambe Bay is likely due to the new homes proposed and to mitigate the impacts of this the Plan states any new development within 3.5km of Morecambe Bay SPA should provide home owner packs to educate new residents over the sensitivity of the area.	We are of the opinion that visitor accommodation in this zone could also have the same impacts and the soundness of the policy could be strengthened by including the requirement for home owner / visitor packs.	No
161/03/DM51/LC/US3	Lucy Barron	Arnside & Silverdale AONB Partnership	Development Management DPD	Chapter 13	DM 51	N/A	LC	US/3	The second paragraph of Policy DM51 could be interpreted to mean that this only applies to caravan development whereas it should relate to all types of proposal. This should be clarified.	We recommend that the second paragraph is clarified to make clear that it refers to all proposals for caravans, chalets, camping pods, log cabins or similar.	No
161/06/C13/LC/US3	Lucy Barron	Arnside & Silverdale AONB Partnership	Development Management DPD	Chapter 13	N/A	N/A	LC	US/3	<p>There is only limited reference to AONB in this chapter. It is also not made clear that the policies within the AONB DPD will be taken into account.</p> <p>Because there is no policy specifically referring to equine related development contained in the Arnside &amp; Silverdale AONB DPD it is important that this district wide policy specifically references the AONB so that a distinction is made between how proposals will be considered in this area, which is particularly sensitive to this kind of development.</p>	<p>Reference should be made to the Arnside &amp; Silverdale AONB within this chapter.</p> <p>Specific references should be added to Policy DM50 in relation to AONBs.</p>	No
169/21/DM52/LC/5	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Development Management DPD	Chapter 14	DM 52	N/A	LC	S	CEP welcomes the revisions to Policy DM52 omitting any specific references to the potential for district heating networks to be incorporated into larger developments. This results in a more sound policy which takes into account development viability.	No suggestion amendments made.	Yes
168/02/DM52/LC/US4	Tim Hamilton Cox	N/A	Development Management DPD	Chapter 14	DM 52	N/A	LC	US/4	<p>Climate Change is real and significant issue for the district and the Local Plan has the opportunity to design in the means of reducing the impact from new development. However, there is no mention in the Plan of the need to provide low-carbon energy infrastructure to supply new housing. This is detail on the types of infrastructure requirement but the focus needs to be on minimising new sources of carbon emission.</p> <p>The Council sets a test for low carbon energy generation but includes a plainly unreasonable target duration of one year.</p> <p>But what is missing most is the 'fabric first' or 'passivhaus design standard to minimise the need for energy in the home at all. The Council is a substantial landowner and could mandate a sustainable home standard way beyond building regulations as other authorities have done. [Further detail provided in the representatives full response.]</p>	Amend Policy DM52 to reflect the issues highlighted.	Yes
160/06/C14/LC/5	David Adams	Axis PED Ltd	Development Management DPD	Chapter 14	DM 52 DM 53	N/A	LC	S	We support the inclusion of Chapter 14 regarding energy generation and it is considered in line with national planning policy. It is recognised that the DPD confirms that development proposals which could connect or supply district heating networks are encouraged to do so.	No suggested amendments made.	Yes
054/20/DM54/LC/US2-3	Chris Garner	Garner Planning on behalf of Russell Arner Ltd	Development Management DPD	Chapter 15	DM 54	N/A	LC	US/2 US/3	It is not clear what amount of housing individual neighbourhood plans should accommodate.	The policy should indicate the level of new housing expected in each proposed neighbourhood plan area.	Yes
051/28/DM55/LC/US4	Dan Mitchell	Barton Willmore on behalf of H20 Urban LLP	Development Management DPD	Chapter 15	DM 55	N/A	LC	US/4	<p>It is noted that work is ongoing in relation to viability assessment and the consideration of a CIL Charge. The Council needs to carefully consider how it expects the identified infrastructure to delivered. Our client supports the submission of a viability assessment to support schemes which are considered to be unviable given the levels of contributions sought. It is considered that these assessments are essential.</p> <p>We would refer to comments made on Policy S613 of the plan in that it is our clients view that no viability work has been undertaken in relation to the IDP. Only estimated costs (in some circumstances) have been provided. No confirmed costs or delivery mechanisms have been presented. [Further detail provided in the representatives full response.]</p>	No suggested amendments made.	Yes
169/22/DM55/LC/5	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Development Management DPD	Chapter 15	DM 55	N/A	LC	S	We welcome Policy DM55's stipulation that proposals for new local services must be located where there is already a choice of travel options. CEPs site at Scofforth Road represents such a location.	No suggestion amendments made.	Yes

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Insert) ATTENDING EXAMINATION
163/28/DM55/LC/5	David Diggle	Turley on behalf of Peel Holdings Investments	<a href="#">Development Management DPD</a>	Chapter 15	DM 55	N/A	LC	S	Peel support Policy DM55 in principle and where practical. However, this should be considered in the context of the wider benefits, costs and viability of development.	No suggested amendments made.	Yes
051/29/DM56/LC/US.1&2&3	Dan Mitchell	Barton Willmore on behalf of H2O Urban LLP	<a href="#">Development Management DPD</a>	Chapter 15	DM 56	N/A	LC	US/5.1 US/2 US/3	Our client is supportive of the Council's aspirations to enhance physical activity and integrate public realm and provide infrastructure to support development. It is noted that there is a requirement to provide a Health Impact Assessment for schemes of 100 or more to assess the impacts on health and well-being. Further clarification on the Council require is needed because this is caveatd by being dependent on the nature and scale with the County Council's Public Health Team.	No suggested amendments made.	Yes
106/35/DM56/LC/US2-3	Craig Barnes	Barton Willmore on behalf of Storey Homes	<a href="#">Development Management DPD</a>	Chapter 15	DM 56	N/A	LC	US/2 US/3	Our client acknowledges the need for new development to avoid adverse impacts for health and well-being and notes the requirement in certain instances for the preparation of a health impact assessment. However, our client questions the justification for the potential need for the submission of this assessment for developments as low in scale as 100 dwellings. It is unlikely that such a scale of development would necessarily result in such adverse affects which would not be addressed via planning application. As such it is considered that this threshold is increased.	In order to provide greater clarity and certainty for application engaged in the pre-application process, our client requests that the Council engage with the Lancashire County Council's Public Health Team directly during the process about the need for this assessment.	Yes
155/14/DM56/LC/5	Paul Nellist	HOW Planning on behalf of Taylor Wimpey	<a href="#">Development Management DPD</a>	Chapter 15	DM 56	N/A	LC	S	The wording of Policy DM56 states the submission of a Health Impact Assessment will depend on the nature and scale of development. Taylor Wimpey support this aspect of the policy and would seek to ensure that this remains an integral part of the policy.	No suggested amendments made.	Yes
185/02/DM56/NLCS/US1&3&4	Maggie Taylor	Sport England	<a href="#">Development Management DPD</a>	Chapter 15	DM 56	N/A	NLC/5	US/1 US/3 US/4	Policy DM56 appears to cover built / indoor sports infrastructure (if not covered by DM27) but it is not underpinned by a Built Facility Strategy therefore fails to meet NPPF paragraph 96. The policy is generally supported by is very generic given the lack of local information about demand and supply.	Further work is required in relation to a Built Facility Strategy. Clarity is needed regarding the scope and applicability of Policy DM27 and DM56.	No
159/01/DM56/LC/US1-4	Steve Simms	SSA Planning Ltd on behalf of Kentucky Fried Chicken	<a href="#">Development Management DPD</a>	Chapter 15	DM 56	N/A	LC	US/1 US/2 US/3 US/4	Kentucky Fried Chicken (Great Britain) Ltd considers that the inclusion of criterion VII of Policy DM56 is unsound on the following grounds:  The policy is not positively prepared and is not based on any robust evidence. The policy is negative in its assumptions over its concept of unhealthy food. There is no objective evidence for the causal link between density and the proximity of hot food takeaways. There is no evidence presented to support the public health effects of any existing and likely concentrations of hot food takeaways. The policy is not effective as it is not clear how such an approach could be monitored. We consider that no regard has been had to national planning policy because the NPPF does not make reference to dietary issues. [Further detail provided in the representatives full response.]	Criterion VII should be deleted from Policy DM56.	Yes
163/29/DM56/LC/5	David Diggle	Turley on behalf of Peel Holdings Investments	<a href="#">Development Management DPD</a>	Chapter 15	DM 56	N/A	LC	S	Policy DM56 sets out various requirements to ensure new development promotes health and well-being. Peel supports these requirements in principle. It is however considered that the submission of a Health Impact Assessment alongside planning applications for all schemes over 100 dwellings is onerous. Issues relating to health and well-being are more typically set out within a Design and Access Statement.	Peel suggest that the requirement of Health Impact Assessment is omitted from Policy DM56.	Yes
167/21/DM57/LC/US1&2&4	Hannah Walker	Barton Willmore on behalf of SCP Consulting Ltd	<a href="#">Development Management DPD</a>	Chapter 16	DM 57	N/A	LC	US/1 US/2 US/3 US/4	Our client notes that the Council are undertaking work to assess the viability of CL. In relation to planning contributions, our client welcomes the recognition that viability is a significant consideration when making requests which accords with national policy. The policy also includes a mechanism where a development is agreed to be unviable, the Council will consider whether any identified can be delivered through other mechanisms such as Government grants. This requires further clarification on how and when this will be made available given cuts to public sector funding.  Policy DM57 refers to an Infrastructure Delivery Plan (IDP) which has been set out the need for new infrastructure in the district. It is our clients position that no viability work or testing has been undertaken in relation to the IDP, only estimated costs have been provided. It is our clients view that the IDP is contrary to paragraph 173 of the NPPD and the scale of obligations proposed will affect and threaten the viability of any scheme.	No suggested amendments made.	Yes
054/21/DM57/LC/US3-4	Chris Garner	Garner Planning on behalf of Russell Arner Ltd	<a href="#">Development Management DPD</a>	Chapter 16	DM 57	N/A	LC	US/3 US/4	There is no benefit in the policy referring to CL investigations. The policy seeks to give development plan status to a subsequent Viability Protocol SPD which is inappropriate.  If financial contributions are so high as to make housing development unviable then the impact will be a reduction in affordable housing. The authority must assess the viability implications as indicated by paragraph 173 of the NPPF.	Delete reference to CL, delete references to the SPD in the policy wording and complete a plan viability assessment before progressing the Local Plan.	Yes
155/15/DM57/LC/5	Paul Nellist	HOW Planning on behalf of Taylor Wimpey	<a href="#">Development Management DPD</a>	Chapter 16	DM 57	N/A	LC	S	The wording of Policy DM57 allows a developer to submit a financial viability assessment to ensure the viability and deliverability of a development. Taylor Wimpey supports this aspect of the policy and would seek to ensure this remains an integral part of Policy DM57.  Paragraph 16.19 of the Development Management DPD states that some flexibility may be shown over the scale of contribution delivered and will be dependent on the level of impact arising from the specific development proposals. This text should be added to the policy wording and not just the supporting text to ensure deliverability and viability of development proposals	The text contained in paragraph 16.19 should be included within Policy DM57.	Yes
169/23/DM57/LC/US2-3	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	<a href="#">Development Management DPD</a>	Chapter 16	DM 57	N/A	LC	US/2 US/3	Policy DM57 sets out a commitment by the Council to investigate the role of CL. The Policy also now contains a cross reference to a Infrastructure Delivery Plan (IDP) which purportedly sets out the needs for new infrastructure across the district. In order to ensure the soundness of Policy DM57 and that it is justified and effective.	Policy DM57 should explain that the spatial development framework for the Garden Village is at a very early stage and the infrastructure identified in the IDP remains only provisional.	Yes
128/15/DM57/LC/US1-4	Aqub Saghir	NIL Consulting on behalf of Persimmon Homes	<a href="#">Development Management DPD</a>	Chapter 16	DM 57	N/A	LC	US/1 US/2 US/3 US/4	The Council intend to adopt a CL change, however caution should be applied and a robust analysis on viability needs to be undertaken to ensure that CL can be deliverable. This is particularly a concern in relation to the high levels of affordable housing expected. Persimmon is supportive of financial contributions that mitigate site specific impacts and that can be robustly demonstrated.	No suggested amendments made.	No
029/07/DM57/LC/5	Adam Key	Savills on behalf of the Bairings Farmland Trustees	<a href="#">Development Management DPD</a>	Chapter 16	DM 57	N/A	LC	S	We welcome the recognition that the delivery of affordable housing should be subject to viability considerations and testing. The Trustees remain unconvinced that CL is the correct approach for the Council.	No suggested amendments made.	Yes
163/30/DM57/NLCS/US1&4	David Diggle	Turley on behalf of Peel Holdings Investments	<a href="#">Development Management DPD</a>	Chapter 16	DM 57	N/A	NLC/5	US/1 US/4	Policy DM57 seeks to establish the principles for the use of CL, however the Council are yet to finish research into the viability of CL. In this regard the provisions of Policy DM57 are somewhat contradictory and premature and clarification is required on this matter.  As referenced within Policy DM57 there is some uncertainty over the future of CL and Peel does not consider it represents the most appropriate mechanism for strategic primary infrastructure delivery in support of strategic allocations.  Peel consider that the list of infrastructure identified in Table 16.1 is not normally appropriate and that infrastructure described can be funded through a range of differing means. The development industry cannot be expected to fund all potential infrastructure in an area, particularly where the need for it arises in relation to population growth which would occur even if new homes were not built. [Further detail provided in the representatives full response.]	Consideration should be given to the role of CL within strategic sites.  The list of infrastructure identified in Table 16.1 is inappropriate and should be revised accordingly.	Yes
054/22/DM58/LC/US2-4	Chris Garner	Garner Planning on behalf of Russell Arner Ltd	<a href="#">Development Management DPD</a>	Chapter 16	DM 58	N/A	LC	US/2 US/3 US/4	The policy requires all major development to enable Fibre to Premises (FTTP). BT will only fund this infrastructure if commercial viable. At the time of submission of a planning application it may not be clear that FTTP is commercial viable. Housebuilders cannot control where fibre is to be provided so requiring FTTP to all major development could delay or preclude housing delivery.	Delete this policy.	Yes
097/10/DM58/LC/US3-4	Joanne Harding	Home Builders Federation	<a href="#">Development Management DPD</a>	Chapter 16	DM 58	N/A	LC	US/3 US/4	The HBF generally consider that digital infrastructure is an important part of integrated development within an area. However, the inclusion of digital infrastructure such as high-speed broadband and fibre is not within the direct control of the development industry and as such it is considered that this policy could create deliverability issues for development and developers  Whilst the NPPF establishes that local planning authorities should seek to support the expansion of electronic communication networks it does not seek to prevent development that does not have access to such networks. The HBF consider that in seeking to provide broadband and fibre to homes the Council should work proactively with telecommunications providers to extend provision and not rely and the development industry to provide for such infrastructure.	The statement 'All major developments within the district will enable Fibre to the Premises (FTTP). For smaller schemes the Council will expect FTTP to be provided where practical.' should be deleted from Policy DM58.	Yes
155/16/DM58/LC/US2	Paul Nellist	HOW Planning on behalf of Taylor Wimpey	<a href="#">Development Management DPD</a>	Chapter 16	DM 58	N/A	LC	US/2	Taylor Wimpey would not support a policy requirements for FTTP on large housing sites if it threatened the viability and/or deliverability of the site. FTTP often requires the involvement of a service provider and therefore further clarify what developers will be required (particularly in the absence of a service provider) is essential.	No suggested amendments made.	Yes
128/16/DM58/LC/US1-4	Aqub Saghir	NIL Consulting on behalf of Persimmon Homes	<a href="#">Development Management DPD</a>	Chapter 16	DM 58	N/A	LC	US/1 US/2 US/3 US/4	The draft plan states that at major development within the district will enable fibre to premises (FTTP). This policy provision is not consistent with national policy and unnecessarily places a burden on developers and should be removed in its entirety. The Council should support the expansion of infrastructure but not create an obstacle to development which may not be able to incorporate such services.	Reference to this requirement should be removed in its entirety from Policy DM58	No
163/31/DM58/LC/5	David Diggle	Turley on behalf of Peel Holdings Investments	<a href="#">Development Management DPD</a>	Chapter 16	DM 58	N/A	LC	S	Peel notes the comments set out in Policy DM58 and supports this proposal in principle and where practical, however this should be considered in the context of the wider benefit, cost and viability of development.	No suggested amendments made.	Yes
106/36/DM61/LC/US3	Craig Barnes	Barton Willmore on behalf of Storey Homes	<a href="#">Development Management DPD</a>	Chapter 16	DM 61	N/A	LC	US/3	Whilst our client does not object to the inclusions of standards in Policy DM61, our client considers that the Council should show some flexibility in their implementation of these standards subject to site specific considerations which may mean lower standards of provision may be suitable within adverse effects on parking levels within and in close proximity to the site.	No suggested amendments made.	Yes
128/17/DM61/LC/US1-4	Aqub Saghir	NIL Consulting on behalf of Persimmon Homes	<a href="#">Development Management DPD</a>	Chapter 16	DM 61	N/A	LC	US/1 US/2 US/3 US/4	Further clarity is still required in the Policy with regard to parking for specific house types and flexibility to take account of site circumstances and housing mix.	The policy requires amending to take this into account.	No
106/37/DM63/LC/US2	Craig Barnes	Barton Willmore on behalf of Storey Homes	<a href="#">Development Management DPD</a>	Chapter 16	DM 63	N/A	LC	US/2	The role of the Lancaster District Highways and Transport Masterplan is acknowledged by our client. Having reviewed this Plan it is noted that it is out-of-date with the Masterplan reflecting proposals outlined within the Draft Version of the Local Plan.  There are also differences in costs set out between the Transport Masterplan and Local Plan, for example the costs of Junction 33 reconfiguration which are considered to be between £40m and £60m in the Transport Masterplan and £40m in the Council's own Infrastructure Development Plan. Our client requests that the costs of this project are confirmed in the near future.	No suggested amendments made.	Yes
167/22/DM59/LC/US4	Hannah Walker	Barton Willmore on behalf of SCP Consulting Ltd	<a href="#">Development Management DPD</a>	Chapter 17	DM 59	N/A	LC	US/4	Policy DM59 requires proposals, particularly those which will generate significant footfall and motorised journeys to be located where sustainable travel patterns can be achieved. In principle, our client supports the need to travel by private car however our client objects to the final paragraph of the policy which relates to highway capacity and the requirement for new infrastructure. As drafted the policy is not consistent with national policy. [Further detail provided in the representatives full response.]	The final part of the policy should be amended to reflect the text outlined in paragraph 32 of the NPPF.	Yes
054/23/DM59/LC/US3-4	Chris Garner	Garner Planning on behalf of Russell Arner Ltd	<a href="#">Development Management DPD</a>	Chapter 17	DM 59	N/A	LC	US/3 US/4	The policy should follow paragraph 29 of the NPPF and confirm that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.	The policy should include the words 'It is recognised that opportunities to maximise sustainable transport solutions will vary from urban to rural areas.'	Yes
169/24/DM59/LC/5	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	<a href="#">Development Management DPD</a>	Chapter 17	DM 59	N/A	LC	S	CEP welcomes the removal of previous text from Policy DM59 which stipulated development will not be permitted where it is considered to prejudice major transport and highway schemes. This reflects the requirements of the NPPF and is considered a more sound approach.	No suggestion amendments made.	Yes
020/04/C17/NA	Marcus Hudson	Lancashire County Council (Highways and Transport)	<a href="#">Development Management DPD</a>	Chapter 17	DM 59 DM 60 DM 61 DM 62 DM 63	N/A	N/A	N/A	Support given to policies DM55, DM60, DM61 and DM63. The County Council particularly support the inclusion of Policy DM63 in relation to the Lancaster District Highways and Transport Masterplan. Further suggested references are recommended for Policy DM63. [Further detail provided in the representatives full response.]	Suggested wording is suggested for Policies DM63 in relation to the Local Cycling and Walking Infrastructure Plan and Movement Strategy.	
122/17/DM60/17.19/LC/5	Tim Bettany - Simons	Canal and River Trust	<a href="#">Development Management DPD</a>	Chapter 17	DM 60	17.19	LC	S	The Trust support the thrust of the policy but given the canal towpath acts as a key sustainable transport route it is disappointing there is no reference to this either within the policy or within the supporting text.	As a minimum the Trust consider that paragraph 17.19 should be expanded to include reference to the Lancaster Canal as an example.	No
169/25/DM60/LC/US1	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	<a href="#">Development Management DPD</a>	Chapter 17	DM 60	N/A	LC	US/1	Paragraph 3 of Policy DM60 is not positively prepared in the context of the NPPF's pursuit of sustainable development.	We request paragraph 3 is amended. Detailed wording is suggested within the representatives full response.	Yes
155/17/DM61/LC/US2	Paul Nellist	HOW Planning on behalf of Taylor Wimpey	<a href="#">Development Management DPD</a>	Chapter 17	DM 61	N/A	LC	US/2	Vehicle parking provision is set out in Policy DM61 and Appendix E. Any parking requirements or standards must be reasonable and justified in order for the Development Management DPD to be found sound at Examination. The Council must therefore ensure that its evidence is robust and up-to-date.	No suggested amendments made.	Yes
100/06/DM61/LC/US1-2	David Barnes	Star Planning on behalf of Seemore Properties Ltd	<a href="#">Development Management DPD</a>	Chapter 17	DM 61	N/A	LC	US/1 US/2	Parking provision is to be delivered in accordance with the requirements as set out in an appendix to the draft Local Plan. However, the blanket application of such standards may not deliver the desired reduction in the use of private cars in some locations, for example along high quality public transport routes or within strategic sites. Flexibility is required in application of the standards to reflect site-specific circumstances.	Some flexibility is required in the application of standards to reflect site specific circumstances.	Yes
169/26/DM62/LC/US4	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	<a href="#">Development Management DPD</a>	Chapter 17	DM 62	N/A	LC	US/4	CEP considers that Policy DM62 is not currently consistent with the NPPF and should be amended. Notwithstanding these amendments we welcome the inclusion of the first paragraph of the Policy of a reference to have a regard to cost effectiveness when considering developer contributions.	Detailed wording is suggested within the representatives full response.	Yes
169/27/DM63/LC/US2	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	<a href="#">Development Management DPD</a>	Chapter 17	DM 63	N/A	LC	US/2	Policy DM63 acknowledges the recent adoption of the Transport and Highways Masterplan and refers to specific improvements along the A61 corridor and crossing of the West Coast Mainline. At present it appears that Policy DM63 applies a number of the more site specific requirements for the Strategic Policies & Land Allocations DPD. Its inclusion in the Development Management DPD is therefore not justified and should be omitted in the interests of soundness.	That Policy DM63 be omitted from the Development Management DPD.	Yes
029/08/DM63/LC/5	Adam Key	Savills on behalf of the Bairings Farmland Trustees	<a href="#">Development Management DPD</a>	Chapter 17	DM 63	N/A	LC	S	We note the proposed improvements to highway capacity on the A61 corridor in South Lancaster. Funding for such infrastructure needs to be carefully considered and public sector funded in order that development is viable and can be delivered.	No suggested amendments made.	Yes
163/32/DM63/LC/5	David Diggle	Turley on behalf of Peel Holdings Investments	<a href="#">Development Management DPD</a>	Chapter 17	DM 63	N/A	LC	S	Policy SG1 identifies a number of design principles relating to transport, including the need for modal shift and network capacity. Policy DM63 references a number of site specific policies which will assist the Council in delivering their Infrastructure Delivery Plan but Policy SG1 has been omitted.	Policy SG1 should be included within the list of policies in Policy DM63.	Yes
076/03/C17/LC/5	Warren Hilton	Highways England	<a href="#">Development Management DPD</a>	Chapter 17	SG 14 SG 15 SG 16	N/A	LC	S	Highways England support the policies set out in Chapter 17 and welcomes the reference to the Strategic Road Network and the commitment to working with key partners to ensure capacity and operation of the network is protected.  We would reiterate our previous comments on welcoming a reference to the 'Planning for the Future' document within the supporting text of Policy DM62.	Reference should be made to Highways England document 'Planning for the Future'. With reference to DM63 we would suggest a minor word change in the final sentence to clarify the DPD to mean the Strategic Policies and Land Allocations DPD.	
155/09/DM27&42/LC/US2	Paul Nellist	HOW Planning on behalf of Taylor Wimpey	<a href="#">Development Management DPD</a>	N/A	DM 27 DM 42	N/A	LC	US/2	Taylor Wimpey generally supports the approach of Policies DM27 and DM42 but at present these policies, appendices and support text to not provide details on how various requirements will be calculated or where deficiencies exist in Lancaster.  Taylor Wimpey would not support a policy requirement for open space and green infrastructure on large housing sites if this threatens the viability and / or deliverability of the site. [Further detail provided in the representatives full response.]	There must relevant mechanisms to relax the requirement if it is proved not to be viable.	Yes
180/02/LC/5	Sacha Rossi	National Air Traffic Services (NATS)	<a href="#">Development Management DPD</a>	N/A	N/A	N/A	LC	S	NATS has no comments to make on the Local Plan.	No suggested amendments made.	No
179/01/NLC1-4/US1-4	Alexander Child	The Planning Bureau Ltd	<a href="#">Development Management DPD</a>	N/A	N/A	N/A	NLC/1 NLC/2 NLC/3 NLC/4 NLC/5 NLC/6	US/1 US/2 US/3 US/4	It is established that specialist housing for older people has different viability characteristics from mainstream housing in terms of site requirements, location, cost, sales rates and revenues. Whilst the proposed Development Management DPD contains Policy DM63 that is aimed at delivering more specialist housing for older people, the delivery of such housing has not been viability tested.	Specialist housing for older people should be viability tested.	Yes
074/02/AppA/LC/5	Tom Clarke	The Theatre Trust	<a href="#">Strategic Policies &amp; Land Allocations DPD</a>	Appendix A	N/A	N/A	LC	S	The trust welcomes and supports the clear definitions of Community Facilities and Cultural Assets. However, we do not feel it necessary to directly reference and exclude public houses as cultural assets. Pubs can provide opportunities for cultural entertainment in addition to their community role.	Removal of the reference to exclude public houses from the 'Cultural Asset' definition should enhance protection should such facilities come under threat from unnecessary loss.	No

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Intend) ATTENDING EXAMINATION
076/01/C1/LC/US2	Warren Hilton	Highways England	Strategic Policies & Land Allocations DPD	Chapter 01	N/A	N/A	LC	US/2	Lancashire County Council adopted and published a Transport Masterplan for Lancaster District in 2016. The masterplan represents the beginning of a programme of highway and transport infrastructure delivery to serve the district over the next 15 years. However, the schemes referenced are not based on any evidence which have been prepared in support of the emerging Local Plan.  Whilst the County Council have addressed some of the previous concerns of HE there remain several issues which include the scope of any transport evidence determining traffic impacts on the Strategic Road Network (SRN). HE requested that Lancaster City Council consider postponing the Publication of the Local Plan to assist them in assessing transport impacts of both existing and proposed development on the transport network. The view of the Council was that the required evidence could be made available before the Public Examination.  The absence of any comprehensive modelled evidence of the performance and effects of the proposed infrastructure improvements and strategies outlined in the Transport Masterplan (and consequently the Local Plan) in relation to the operation of the M6 are of concern to HE at this time.  Whilst the Council has engaged with HE throughout this process, we do not presently consider that our comments relating to the lack of robust transport evidence have been addressed. [Further detail provided in the representatives full response.]	We request that a comprehensive and transparent cumulative transport assessment is undertaken before the Public Examination for the strategic development sites, in addition to assessments for those sites in close proximity to the SRN that are likely to generate over 30 two-way trips.	
081/02/C1/LC/5	Melanie Lindsay	The Coal Authority	Strategic Policies & Land Allocations DPD	Chapter 01	N/A	N/A	LC	S	The Coal Authority is pleased to see reference is made to the Lancashire Waste and Minerals Local Plan and its policies and policy direction as being a material consideration in the decision making process.  We are however disappointed that Policy EN11 relating to Mineral Safeguarding Areas appears to have been removed from the plan.	No suggested amendment made.	No
050/01/2.20-2.33/LC/5	Emily Hrycan	Historic England	Strategic Policies & Land Allocations DPD	Chapter 02	N/A	2.20- 2.33	LC	S	We welcome the recognition of the historic environment in Lancaster, including the City and surrounding towns of Morecambe Camforth and rural areas.	No suggested amendments made.	No
051/01/PP/LC/US	Dan Mitchell	Barton Willmore on behalf of H20 Urban LLP	Strategic Policies & Land Allocations DPD	Chapter 03	N/A	N/A	LC	US	Our client recommends that the plan period to be extended by three years to 2034. This will provide a sufficient period for planning objectives and growth to be delivered. As draft the plan period is considered unsound and is not consistent with national policy. [Further detail provided in the representatives full response.]	Extend the plan period period by three years to 2034.	Yes
051/02/C3/LC/5	Dan Mitchell	Barton Willmore on behalf of H20 Urban LLP	Strategic Policies & Land Allocations DPD	Chapter 03	N/A	N/A	LC	S	Our client continues to be generally supportive of the proposed Spatial Vision for Lancaster District. This is on the basis that it is largely consistent with national policy. However, we have concerns with the proposed wording 'right time' and clarification of this matter is required.	Clarification required over the terminology 'right time'.	Yes
167/01/PP/NLC/US3-4	Hannah Walker	Barton Willmore on behalf of SCP Consulting Ltd	Strategic Policies & Land Allocations DPD	Chapter 03	N/A	N/A	NLC/5	US/3 US/4	Our client recommends that the plan period to be extended by three years to 2034. This will provide a sufficient period for planning objectives and growth to be delivered. As draft the plan period is considered unsound and is not consistent with national policy. [Further detail provided in the representatives full response.]	Extend the plan period period by three years to 2034.	Yes
167/02/5V/LC/5	Hannah Walker	Barton Willmore on behalf of SCP Consulting Ltd	Strategic Policies & Land Allocations DPD	Chapter 03	N/A	N/A	LC	S	Our client strongly support the Council's vision and ambitions to welcome new investment in the district recognising the need to grow the local economy. However, in line with Strategic Objective 1 the Council must ensure this growth is distributed across the district and not merely directed to Lancaster and Heyblun. [Further detail provided in the representatives full response.]	Economic growth should be evenly distributed across the district.	Yes
106/06/PP/LC/US4	Craig Barnes	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 03	N/A	N/A	LC	US/4	The Lancaster District Local Plan will provide for a 20 year plan period between 2011 and 2031. Our client is concerned that the period provided by the Local Plan post adoption is insufficient to secure the delivery of the proposed vision and objectives. At the time of writing the Local Plan is set to expire in 13 years, as a result the potential adoption period provided by the plan is below that which is set out by the Government in paragraph 157 of the NPPF.	The principle issue of this timescale post adoption is to ensure that there is sufficient period within the scope of the Local Plan for planning objectives and growth needs to be delivered. The extension of the plan period by 3 years will enhance the deliverability of these and bring the wider plan into alignment with the proposed housing requirement.	Yes
106/07/C3/LC/US3	Craig Barnes	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 03	N/A	N/A	LC	US/3	Our client believes that the proposed vision is too simplistic in its approach. Whilst specific town visions are welcomed, beyond these the wider parts of the district are described as 'coast and countryside'. Our client believes that this ignores the diversity of the rural parts of the district and represents a disconnect from national planning policy and the spatial approach to delivery.  Our client believes that insufficient attention is provided within the vision to the need of the Council to allow the delivery of sufficient levels of housing of the right type and in the right location to enable wider sections of the community to own a home which is affordable and built to a high standard. These connected issues are given significant attention in national planning policy and is a significant matter to be addressed in this Local Plan.	No suggested amendments made.	Yes
148/01/C3/LC/5	Jon Power	CBRE on behalf of Lancaster University	Strategic Policies & Land Allocations DPD	Chapter 03	N/A	N/A	LC	S	Strong support for the spatial vision and the identification of Lancaster University as a key contributor to the prosperity of the District. With regard to the vision for Lancaster, the University consider that the Plan underplays the critical importance of improving the profile and status of the University in conjunction with its host city.	No suggested amendments made.	Yes
146/01/PP/LC/US1-4	John Fleming	Gladman Developments Ltd	Strategic Policies & Land Allocations DPD	Chapter 03	N/A	N/A	LC	US/1 US/2 US/3 US/4	The Plan covers a period 2011 - 2034, however for the purposes of housing delivery Policy SP6 seeks to extend the plan period to 2034 to allow for an additional 3 monitoring years to achieve the housing target. Whilst the Council consider it necessary to extend the plan what this actually does is artificially reduce the annual requirement to 522 dwellings annum. Accordingly this will artificially reduce the annual requirement for the purposes of calculating housing supply and is therefore no justified. Gladman object to this approach.	If the plan period is extended then consequently the housing requirement over the plan period should be increased.	
050/02/C3/LC/5	Emily Hrycan	Historic England	Strategic Policies & Land Allocations DPD	Chapter 03	N/A	N/A	LC	S	We support the vision especially that by 2031 Lancaster's historic environment will be protected and enhanced including the city and its surrounding districts.	No suggested amendments made.	
097/02/LC/US1&4	Joanne Harding	Home Builders Federation	Strategic Policies & Land Allocations DPD	Chapter 03	N/A	N/A	LC	US/1 US/4	Documents state that the plan period is to cover the period 2011/12 to 2031/32 with the exception of the housing policy which cover the period 2033/34. This appears to provide the opportunity for confusion and it is considered that it may be more appropriate to move to a consistent plan period. It is also noted that the plan period will not ensure a 15-year time horizon post adoption as preferred by the NPPF.	Whilst it is recognised that this may have implications for the evidence base, site allocations and plan policies, the HBF recommends that the Council considers extending the end date of the Plan. It will be important that this longer plan period aligns with the housing requirements, with an appropriate supply of housing land for the same period. This could mean that additional sites need ton be available, particularly in the short term.	Yes
168/01/C3/LC/5	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Strategic Policies & Land Allocations DPD	Chapter 03	N/A	N/A	LC	S	CEP support and consider sound the Council's vision for Lancaster. Key to achieving this will be the delivery of new homes and the spatial vision should include specific reference to the role of housing delivery in supporting the Council's strategic ambitions.	The spatial vision should be amended to refer to the role of housing in delivering the strategic ambitions identified.	Yes
163/01/PP/NLC/US1-4	David Diggle	Turley on behalf of Peel Holdings Investments	Strategic Policies & Land Allocations DPD	Chapter 03	N/A	N/A	NLC/5	US/1 US/2 US/3 US/4	The plan period is between 2011 and 2031. The timeframe for delivery in Policy SP6 is 2011 and 2034. The period of delivery of new homes has been extended to ensure that this aspect of the plan complies with paragraph 157 of the NPPF. However, the timeframe within Policy SP6 conflicts with the overall plan period and should be consistent throughout the plan.  Moreover the 12,000 dwelling requirement within the Plan is the amount suggested by the Council to meet needs up to 2031, but has been stretched across the extended delivery period to 2034. Any delivery beyond 2031 should be additional to the 12,000 requirement. As currently drafted Policy SP6 does not meet the housing needs up to 2034.	No suggested amendments made.	Yes
163/02/5V/LC/5	David Diggle	Turley on behalf of Peel Holdings Investments	Strategic Policies & Land Allocations DPD	Chapter 03	N/A	N/A	LC	S	Peel is broadly supportive of the Spatial Vision. It provides a positive basis for sustainable growth in the district. However, it is noted that there is no explicit mention in the Vision of housing delivery.	The Vision should include reference to housing delivery.	Yes
110/01/C3/SP3-4/LC/5	Nick Moule	N/A	Strategic Policies & Land Allocations DPD	Chapter 03	SP 03 SP 04	N/A	LC	S	Lancaster has probably done as much as can be expected on consultation to meet current guidance criteria and resource constraints. However, experience shows that very few people understand what Council's do, their responsibilities and frequently only react when they become directly affected. [Further detail provided in the representatives full response.]	What the Council should carefully about after the finalisation of the Plan is what more can be done to help local residents be more informed of priorities and progress on key schemes.	No
103/01/C3-4/LC/US1	Daniel Hughes	PWA Planning on behalf of Oakmere Homes	Strategic Policies & Land Allocations DPD	Chapter 03 Chapter 04	N/A	N/A	LC	US/1	It is considered through subsequent objections to the Local Plan that further sites should be identified within the Local Plan to ensure that aspiration sought by the vision of the plan can be provided for. In the current context of the DPD is not considered sound and is not positively prepared in that it is not demonstrated that it is prepared on a strategy which meets development needs. [Further detail provided in the representatives full response.]	Further land should be identified to meet residential development needs.	Yes
051/03/C4/LC/5	Dan Mitchell	Barton Willmore on behalf of H20 Urban LLP	Strategic Policies & Land Allocations DPD	Chapter 04	N/A	N/A	LC	S	Our client is generally supportive of the proposed strategic objectives. It is noted that within Objectives 1-5 that additional 'sub-objectives' have been included. The main focus of the objectives remain lost within the text and continues to be more akin to policy than objectives. We maintain these should be simplified.  It is noted that there remain inconsistencies relating to Camforth where it is referenced as both a 'Market Town' and 'Local Service Centre'. Consistency should be applied and we would suggest that Camforth is referred to as a 'Main Town'.  It is noted that SO4 includes reference to the Community Infrastructure Levy. Whilst CIL is supported in principle where it is proven necessary and viable, further information is required from the Council as how this is to be implemented.	The Strategic Objectives should be simplified. Reference to Camforth should be as a 'Main Town'. Further clarity to be provided on how the Community Infrastructure Levy will be implemented.	Yes
167/03/5O/LC/5	Hannah Walker	Barton Willmore on behalf of SCP Consulting Ltd	Strategic Policies & Land Allocations DPD	Chapter 04	N/A	N/A	LC	S	Our client continue to support the Council's ambitions to strengthen the role of Camforth as an important local centre. We generally support the Council's ambitions to provide new housing and support economic growth. However, to achieve these strategic objectives and delivery sustainable growth the Plan must allocate new employment sites in Camforth as well as for housing. It is noted there is an inconsistency in the way Camforth is referred to in the strategic objectives as either market town or local service centre. This should be clarified.	The allocation of new employment land in Camforth is necessary to fulfil the strategic objectives. Consistency of wording should be provided into how Camforth is referred to.	Yes
106/08/06/LC/US3-4	Craig Barnes	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 04	N/A	N/A	LC	US/3 US/4	Our client agrees that the five over-arching objectives are the matters which are most critical for the Local Plan to address.  Our client support the economic ambitions of the Council and welcomes the aspirations to diversify the economy and employment in the district. Our client is supportive to the recognition provided to the role of housing in achieving these economic aims. Our client also support the inclusion by the Council of the need for planning policy to support the rural economy, however this should be expanded to refer to the role of housing development in delivering rural economic growth.  Our client welcomes the attention provided to towards housing issues such as sustainable delivery, housing of the right type, well designed housing, energy efficiency, high quality and the need for rural housing. A notable absence is the need to secure development in a timely manner to maintain a 5 year supply and ensuring the delivery of the housing requirement within the plan period. The Council should also include objectives to secure full delivery of affordable housing needs and provide greater access to housing for first time buyers. The Council should ensure that there is sufficient balance within its planning policies to ensure that development needs of places affected by blanked environment or historic designations can be delivered sensitively. For example Areas of Outstanding Natural Beauty have development needs which should not be ignored.  A key objective in the Local Plan is the delivery of infrastructure, this plan should set out how, when and whom will deliver this infrastructure. Our client is supportive of the Council's objective to reduce the need to travel by concentrating development in sustainable locations. However, a key part of this for rural areas is the need to secure new development which will retain business, workforce and ensure sustainable communities are maintained.	No suggested amendments made.	Yes
148/02/C4/LC/5	Jon Power	CBRE on behalf of Lancaster University	Strategic Policies & Land Allocations DPD	Chapter 04	N/A	N/A	LC	S	The University considers that the strategic objectives in relation to housing should include specific reference to future student residential development.	Include reference to student accommodation within the Strategic Objectives.	Yes
050/03/C4/LC/5	Emily Hrycan	Historic England	Strategic Policies & Land Allocations DPD	Chapter 04	N/A	N/A	LC	S	We support the content of Strategic Objectives SO1 and SO3 particularly those which relate to the historic environment.	No suggested amendments made.	
097/03/C4/LC/5	Joanne Harding	Home Builders Federation	Strategic Policies & Land Allocations DPD	Chapter 04	N/A	N/A	LC	S	The strategic objectives are generally considered appropriate, we particularly welcome Strategic Objectives SO1 and SO2. The reference to SO2 to not only meeting the changing needs of the population but also support growth is particularly important.	No suggested amendment made.	Yes
021/01/C4/LC/US1-4	David Alexander	N/A	Strategic Policies & Land Allocations DPD	Chapter 04	N/A	N/A	LC	US/1 US/2 US/3 US/4	The plan has a range of shortcomings which affect its soundness, these are summarised as:  The published DPD contains a myriad of scattered urban fringe greenfield sites around the district. There is no reference to the increasing automation of employment opportunities and assumes that the in-migration will be from urban areas to the South. There is no focus on the priorities for the development pattern of these sites – a sequential approach – that firmly provides an emphasis to brownfield sites being developed first. The DPD should include a list of key priorities for development. It is not clear that the DPD has fully taken into account the potential wider planning impact of the strategic objectives on the sub-region and neighbouring authorities, particularly in relation to housing, employment and environment policies. How far will the delivery of growth to the scale proposed will put at risk the much lauded self-containment strategy of the district through encouraging outward commuting? How effective is a DPD that provides such a widespread range of development sites without a clear direction of planning steer to the priorities. Will developers continue to 'cherry pick' the best sites and leave behind the long standing sites that local residents wish to see regenerated? The DPD makes no attempt to consider what impact the development of large strategic greenfield sites notably Bailrigg Garden Village, will have for the realistic implementation of the rest of the DPD and especially in relation to regeneration. [Further detail on these matters provided in the responder's full response.]	No suggested amendments made.	No
131/01/C4/NLC/US2	Jane Cheal	N/A	Strategic Policies & Land Allocations DPD	Chapter 04	N/A	N/A	NLC/3	US/2	The DPD is based on an alleged assessment of housing need which is disputed and considered to be a gross exaggeration of what is actually required. I do not believe that the report prepared by Turley was truly independent and is not considered to be based on any genuine evidence. [Further detail provided in the representatives full response.]	The proposed housing need has been totally exaggerated based on spurious figures in the Turley Report. My objection cannot be resolved with modification. The proposed housing development in the area is unnecessary and based on unsound evidence.	No
128/01/C4/LC/US3-4	Aqub Saghir	NUL Consulting on behalf of Persimmon Homes	Strategic Policies & Land Allocations DPD	Chapter 04	N/A	N/A	LC	US/1 US/2 US/3 US/4	In general Persimmon are supportive of the Strategic Objectives SO1 and SO2. The support and emphasis on growth and economic potential of the district is considered appropriate. These strategic policies should however be reflected throughout the plan which does not seem to be the case.	No suggested amendment made.	No
124/01/C4/LC/US1-4	Michael Gilbert	Peter Brett Associated on behalf of Hurstwood Holdings	Strategic Policies & Land Allocations DPD	Chapter 04	N/A	N/A	LC	US/1 US/2 US/3 US/4	We generally support the overall thrust of the strategic objectives. However, we note the change in emphasis from the previous draft which aimed to make provision of the full objectively assessed housing need for the district. This has now been diluted to a simple reference of diversing housing in the district. We do not consider this to be sufficiently ambitious statement of intent. Whilst we note the Council has highlighted constraints to identifying sufficient housing land to meet needs in full, we are not convinced this is adequate justification for not at least striving to meet as a minimum the objectively assessed housing need in the district.  As it stands this is not a sound objective as it contradicts the current version of the NPPF which direct authorities to meet their full objectively assessed need. Notwithstanding the above the redevelopment of the Lune Industrial Estate will make a clear positive contribution towards fulfilling this proposed objective. [Further detail provided in the representatives full response.]	The Council should seek to meet its objectively assessed housing need in full.	Yes
163/03/5O/LC/5	David Diggle	Turley on behalf of Peel Holdings Investments	Strategic Policies & Land Allocations DPD	Chapter 04	N/A	N/A	LC	S	Peel is broadly supportive of the Strategic Objectives identified. The objectives cover a variety of issues including housing delivery and infrastructure provision.	No suggested amendments made.	Yes
051/04/C5/LC/5	Dan Mitchell	Barton Willmore on behalf of H20 Urban LLP	Strategic Policies & Land Allocations DPD	Chapter 05	N/A	N/A	LC	S	The Key Diagram provides a useful overview of how the Local Plan is derived, however it is felt that given the changing national policy position reference should be made to the neighbouring authorities within the Key Diagram.	Add reference to neighbouring authorities within the Key Diagram.	Yes
106/09/C5/LC/5	Craig Barnes	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 05	N/A	N/A	LC	S	The Key Diagram provides a useful overview of the context provided for plan making which has influenced how the Local Plan has been derived. It provides a strategic overview of the spatial approach to development in the district and allows those with a lesser understanding of the district's geography to better grasp the picture of development.	Given the emerging shifts in emphasis by national planning policy towards cross boundary planning, it is considered that reference should be made on the Key Diagram to identify its bordering Local Planning Authorities.	Yes

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Intest) ATTENDING EXAMINATION
148/01/CS/LC/5	Ion Power	CBRE on behalf of Lancaster University	Strategic Policies & Land Allocations DPD	Chapter 05	N/A	N/A	LC	S	To reflect the importance of the University to the regional economy, it is considered that the University's estate, including the Bailrigg Campus, Health Innovation Park and Forest Hills is identified on the Key Diagram as a 'Strategic Site'.  Reference should also be made to the Junction 33 improvements which will have a regionally significant impact.	Additional references should be added to the Key Diagram identifying all of the University Assets as a Strategic Site. Reference to Junction 33 improvements should be made.	Yes
051/05/SP1/LC/5	Dan Mitchell	Barton Willmore on behalf of H20 Urban LLP	Strategic Policies & Land Allocations DPD	Chapter 06	SP 01	N/A	LC	S	Our client is supportive of the inclusion of a model policy of the presumption in favour of sustainable development. However, it is not necessary to include specific reference to neighbourhood plans because adopted neighbourhood plans form part of the Development Plan. This reference should be omitted.  Notwithstanding this, it should be borne in mind that the proposed changes of the NPFF include amendments to the presumption. As such this policy may require revision.	Remove reference to neighbourhood plans from Policy SP1.	Yes
167/05/SP1/LC/5	Hannah Walker	Barton Willmore on behalf of SCP Consulting Ltd	Strategic Policies & Land Allocations DPD	Chapter 06	SP 01	N/A	LC	S	Our client is supportive of the inclusion of a model policy of the presumption in favour of sustainable development. However, it is not necessary to include specific reference to neighbourhood plans because adopted neighbourhood plans form part of the Development Plan. This reference should be omitted.  Notwithstanding this, it should be borne in mind that the proposed changes of the NPFF include amendments to the presumption. As such this policy may require revision.	Remove reference to neighbourhood plans from Policy SP1.	Yes
106/10/SP1/LC/5	Craig Barnes	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 06	SP 01	N/A	LC	S	Our client is supportive of the inclusion of a model policy of the presumption in favour of sustainable development. The inclusion of a policy reflecting the presumption is critical for ensuring consistency with national planning policy. Proposed changes to the NPFF are currently being consulted upon by the Government, as such should this be adopted ahead of the Local Plan, there will be a need to revise this policy.	No suggested amendments made.	Yes
146/02/SP1/NLCS/US1-4	John Fleming	Gladman Developments Ltd	Strategic Policies & Land Allocations DPD	Chapter 06	SP 01	N/A	NLC/5	US/1 US/2 US/3 US/4	Gladman are fully supportive of the direction taken in Policy SP1, which sets out that decisions will be made in accordance with the presumption in favour of sustainable development. Notwithstanding this, Gladman consider SP1 should go further in its approach to ensuring the delivery of sustainable development in line with national planning policy.	No suggested amendments made.	Yes
155/01/SP1/LC/5	Paul Nellist	HOW Planning on behalf of Taylor Wimpey	Strategic Policies & Land Allocations DPD	Chapter 06	SP 01	N/A	LC	S	Taylor Wimpey supports a presumption in favour of sustainable development in accordance with the NPFF, which is important in ensuring that sustainable development is not delayed and that the Council can meet its development needs in a timely manner.	No suggested amendments made.	Yes
166/01/CS/LC/5	Eileen Wallbank	N/A	Strategic Policies & Land Allocations DPD	Chapter 06	SP 01	N/A	LC	S	In the Plan is states that for a settlement to be considered as potentially sustainable it should have a local convenience store, primary school and public bus service. Some village, such as Dolphinholme which are no longer considered to be sustainable may be again in the future if these services are reinstated.	No suggested amendments made.	No
148/02/SP1/LC/US4	Tamsin Hartley	On behalf of the Forest of Bowland AONB Parish Councils	Strategic Policies & Land Allocations DPD	Chapter 06	SP 01	N/A	LC	US/4	Policy SP1 obscures the national requirement to restrict further residential development within the AONB by failing to quote this upfront and in full (instead of confusing referring to footnote 9).	Full references to the AONB should be included in Policy SP1	Yes
051/06/SP2/LC/US1-3	Dan Mitchell	Barton Willmore on behalf of H20 Urban LLP	Strategic Policies & Land Allocations DPD	Chapter 07	SP 02	N/A	LC	US/1 US/2 US/3	Our client continues to support the approach of the council in identifying a settlement hierarchy and the changes proposed since the draft Local Plan are noted. We do consider that Morecambe, Heysham and Carnforth should all be designated as main towns rather than separated into key service centres and market towns. It is not clear why there is a need for such separation. We continue to have concerns over the inclusion of 'sustainable rural settlements because this wording indicates that settlements outwith of this tier are not sustainable, which is incorrect.	All three centres should be identified as either market towns or key service centres.	Yes
167/06/SP2/LC/5	Hannah Walker	Barton Willmore on behalf of SCP Consulting Ltd	Strategic Policies & Land Allocations DPD	Chapter 07	SP 02	N/A	LC	S	Policy SP2 establishes a hierarchy of settlements to inform new developments across Lancaster. Carnforth is a busy centre that serves that rural areas of North Lancashire and South Cumbria, it holds a good range of services and facilities and is important that the town provides sustainable economic development opportunities for its future and existing residents.	In presentation terms Policy SP2 places Carnforth below Morecambe and Heysham in the settlement hierarchy. Our client requests that Carnforth is included on the same row as Morecambe and Heysham to make clear its equal position in the hierarchy and minimise the potential for misinterpretation.	Yes
106/11/SP2/LC/US1&2&4	Craig Barnes	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 07	SP 02	N/A	LC	US/1 US/2 US/4	Our client objects to the differentiation set out within the settlement hierarchy of settlements which are located within and outside Areas of Outstanding Natural Beauty (AONB). Policy SP3 already makes clear that in considering development proposals within the AONB the Council will have regard to landscape quality. In our clients view that this wording, together with the NPFF and later policies in the Local Plan provides sufficient clarity on this matter. The Policy does not seek to single out settlements in the Green Belt in the same way. The focus attached to AONBs within Policy SP2 is disproportionate and as described unnecessary.	Our client therefore requested that all sustainable settlements are considered within a single tier of the settlement hierarchy.	Yes
025/01/SP2/LC/5	Mark Evans	Fylde Borough Council	Strategic Policies & Land Allocations DPD	Chapter 07	SP 02	N/A	LC	S	Fylde Council notes and supports the overall strategy with sustainable settlements and Policy SP2 setting out the district's settlement hierarchy. It is noted that Lancaster City Council are promoting an urban-focused approach that is supplemented with additional large strategic development sites in greenfield locations.	No suggested amendments made.	No
151/02/SP2/LC/US1	Matthew Symons	Hollins Strategic Land	Strategic Policies & Land Allocations DPD	Chapter 07	SP 02	N/A	LC	US/1	It is considered that the Plan must acknowledge that there are significant differences between the levels of sustainability for the sustainable rural settlements. The Sustainable Settlement Review confirms that Galgate has all but one key service and has strong transport links. It does not acknowledge that access to employment and public transport will all improve significant as a result of the Garden Village.	It is evident that Galgate is a highly sustainable location, the plan must acknowledge this to be considered as being positively prepared.	Yes
169/02/SP2/LC/5	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Strategic Policies & Land Allocations DPD	Chapter 07	SP 02	N/A	LC	S	We support the identification of Lancaster as a sub-regional centre within the district and the focus for future housing and growth. This is considered to be a sound approach benefitting the delivery of a significant urban extension at Bailrigg Garden Village.	No suggested amendments made.	Yes
019/01/SP2/LC/5	Tony McAteer	McAteer Associates Ltd	Strategic Policies & Land Allocations DPD	Chapter 07	SP 02	N/A	LC	S	Eccleston Homes support the Council's settlement hierarchy identified under Policy SP2 and support the identification of Lancaster as the focus for future growth in the district.	No suggested amendments.	No
128/02/SP2/LC/US1-4	Aqub Saghir	NIL Consulting on behalf of Persimmon Homes	Strategic Policies & Land Allocations DPD	Chapter 07	SP 02	N/A	LC	US/1 US/2 US/3 US/4	Policy SP2 which supports proposals for development in a range of settlements is supported.	The Council should consider the allocation of sites within and on the edge of these identified areas.	No
149/03/SP2/LC/US1-4	Tamsin Hartley	On behalf of the Forest of Bowland AONB Parish Councils	Strategic Policies & Land Allocations DPD	Chapter 07	SP 02	N/A	LC	US/1 US/2 US/3 US/4	We submit that this DPD is not sound because we believe that Policy SP2 is not the most appropriate option when assessed against the reasonable alternatives. The methodology used to prepare the Sustainable Settlements Review is fundamentally flawed as 'sustainable settlement' is not a planning term and there is no justification for providing such a concept as the determinant for directing housing growth. It is also impossible for the reader to follow the methodology or see its outcomes. There is no attempt to say how the information collected has been weighted to produce the final result. It sees that the landscape / townscape value are acknowledged but then ignored. The accessibility of service is essentially nonsensical and willfully ignores the current and inevitable primacy of the car. It is not credible that a population density of 0.2 people / hectare can be the definition of a settlement. It is also not true that rural people live outside a settlement yet before they live within it. Highlighting the above point seek to demonstrate that the option / policy produced is not credible. Furthermore if all the information required by the methodology is not complete / available it is hard to know how the growth foci identified have been selected. A far simpler approach to SP2 would be to retain the primacy of the 4 urban areas, a distinction between AONB and non-AONB settlements, with a quoted requirements as explicitly directed in the NPFF that housing development must be restricted within AONBs and that settlements within them are expected to meet just their own arising housing needs and finally revised criteria assess the potential contribution / ranking of non-AONB settlements led by national sustainable development criteria and potentially subject to a landscape capacity approach. For consistency where a neighbourhood plan exists with a properly contextualised / researched strategy to meet its assessed housing requirements this should be used to determine both the quantum and quality of development in that area. [Further detail provided in the representatives full response.]	The sustainable settlements methodology and approach should be abandoned, in favour of the simple, clearer and more credible alternative set out above. This will ensure consistency with national planning policy and guidance is achieved.  Clarification of the derivation and anticipated effect of the proposed 'landscape capacity' should be incorporated into the DPD. If this is to be included to strengthen the national requirement to restrict development within the AONB - this should be made clear to both communities and developers. If this is to be included to provide more sensitive consideration of development proposals then this should be made clear. In either instance, a full explanation of the methodology to be employed, how it will fit within the Neighbourhood Plan landscape research, how it will be resourced and how it will enhance / implement national policy directives is required.	Yes
059/02/SP2/LC/US4	Eddie Taylor	On behalf of Wray Parish Council	Strategic Policies & Land Allocations DPD	Chapter 07	SP 02	N/A	LC	US/4	Policy SP2 is not sound because it is not consistent with national policy particularly in relation to the requirements of paragraph 14 and footnote 9. In this context the identification of settlements in the Local Plan in the AONB as a focus of growth to meet objectively assessed needs is not consistent with national policy. Furthermore there is no meaning in national policy to the term 'sustainable development' and the poor definition of this in the Sustainable Settlement Review and lack of settlement boundaries mean the Local Plan is unclear and not consistent with paragraph 15 of the NPFF.  Further detailed submission is made which seeks to dispute the methodology and findings of the 2018 Sustainable Settlement Review in relation to the findings for the village of Wray. This can be read in more detail via the representatives full response.	For any approach to be consistent with national planning policy, the concept 'sustainable settlement would have to be dropped as would the related concept 'focus for growth' which is dependent on it.  The proposed hierarchy for SP2 should have the same settlement in categories 1 and 2 but then would have a revised category 3 with other rural settlements outside of AONBs which would not be exempted from meeting some of the OAN for the district and a revised category 4 with other rural settlements inside the AONB which would be explicitly exempted from meeting the district's OAN as per paragraph 14 (footnote 9) of NPFF.  In addition the policy should state that 'Where there is a Neighbourhood Plan in place with a growth strategy, that should determine the development in the area'. This approach should also be reflected in the justification of the policy.	Yes
016/01/SP2/LC/US1	Robert Bailey	Over Kellet Parish Council	Strategic Policies & Land Allocations DPD	Chapter 07	SP 02	N/A	LC/4	US/1	Objection raised to the identification of Over Kellet within the sustainable settlements category of Policy SP2. There are insufficient services to justify such a designation [Further details provided within the full representation].	Over Kellet should be removed from the Sustainable Settlement category of Policy SP2.	No
124/02/SP2/LC/US1-455	Michael Gilbert	Peter Brett Associated on behalf of Hurstwood Holdings	Strategic Policies & Land Allocations DPD	Chapter 07	SP 02	N/A	LC	US/1 US/2 US/3 US/4	We are in broad agreement with the development strategy as set out and would like to firmly emphasise that the redevelopment of the Lune Industrial Estate represents a significant urban brownfield opportunity in the sub-regional centre, which the Council confirms should be the focus for growth.	No suggested amendments made.	Yes
029/01/SP2/LC/5	Adam Key	Savills on behalf of the Bailrigg Farmland Trustees	Strategic Policies & Land Allocations DPD	Chapter 07	SP 02	N/A	LC	S	We continue to support the identification of Lancaster as the regional centre and being the focus for future growth in the district for accommodating the majority of new development. We also welcome the acknowledgement that a range of greenfield sites will be required to meet development needs.	Not applicable	Yes
108/01/SP2/LC/US1-4	Graham Love	Smith & Love Planning on behalf of G & M Parker	Strategic Policies & Land Allocations DPD	Chapter 07	SP 02	N/A	LC	US/1 US/2 US/3 US/4	We support the inclusion of Caton-with-Littledale as a Sustainable Rural settlement. We do not however consider it necessary to include the wording 'where a landscape capacity approach will be taken' and this should be deleted. A landscape capacity approach is imprecise and is not defined in the Local Plan, there is no proposed methodology for the approach in the evidence base and is not consistent with national planning policy.  The scope to allocate sites for development in and around the sustainable settlements can be adequately assessed using the 2018 SHELAA and unplanned development adequately controlled by proposed Policy EN4 and the relevant policies in the Development Management DPD.	Removal of reference to the landscape capacity approach from Policy SP2.	Yes
107/01/SP2/LC/US1-4	Graham Love	Smith & Love Planning on behalf of J & S Lamb	Strategic Policies & Land Allocations DPD	Chapter 07	SP 02	N/A	LC	US/1 US/2 US/3 US/4	Glasson Dock is not included within the list of sustainable rural settlements. We disagree with the settlement classification for Glasson Dock as based on the Interim Sustainable Settlement Review and we disagree that the potential for new housing should be limited in this area to evidence needs only.  It is considered that Glasson Dock provides all the necessary indicators to qualify and therefore it should be re-instated within the settlement hierarchy. [Further detail provided in the representatives full response.]	Glasson Dock should be included in the list of Sustainable Rural Settlements outside of the AONB in Policy SP2.	Yes
163/04/SP2/LC/5	David Diggle	Turley on behalf of Peel Holdings Investments	Strategic Policies & Land Allocations DPD	Chapter 07	SP 02	N/A	LC	S	Peel supports Policy SP2 which identifies Lancaster will provide the focus for future growth. The proposed hierarchy is considered appropriate and provides a sound basis for delivering its growth strategy and ambitions for delivering the Governments housing and planning objectives.  However, Bailrigg Garden Village is not specifically mentioned in the settlement hierarchy. Given the size and importance of the Garden Village, Policy SP2 needs to identify where and how the Garden Village sits within the hierarchy. [Further detail provided in the representatives full response.]	Bailrigg Garden Village should be appropriately identified on the settlement hierarchy.	Yes
161/01/CS/LC/US4	Lucy Barron	Arnside & Silverdale AONB Partnership	Strategic Policies & Land Allocations DPD	Chapter 07	SP 02 SP 03	N/A	LC	US/4	Whilst we welcome the reference to constraints of protected landscapes and the landscape-capacity led approach, we do not consider that it is consistent with national policy (according to footnote 9) that settlements within the AONBs will be a focus for growth in Lancaster. This implies that these settlements could be expected to accommodate development to meet wider strategic housing needs of the whole district.	The addition of wording to Policy SP2 to clarify that development in sustainable settlements within AONBs should closely reflect identified needs of the individual local communities would ensure that this point was addressed and the policy is fully consistent with NPFF.	No
146/03/SP2-3/NLCS/US1-4	John Fleming	Gladman Developments Ltd	Strategic Policies & Land Allocations DPD	Chapter 07	SP 02 SP 03	N/A	NLC/5	US/1 US/2 US/3 US/4	Although Gladman support the principle that growth will be directed to the urban areas and the role that settlements identified under Policy SP2 will play in accommodating future development needs. However this should not be at the expense of lower order settlements being able to accommodate future development needs.  It is noted that planned housing growth will be managed to reflect existing population size, whilst this may provide a useful starting point but it is important to note that growth is not solely dependent on population and the Council does not lose sight that settlements can often play an important role in the local geographical context in terms of relationship with other settlements. [Further detail provided in the representatives full response.]	The requirement to locate housing in the rural area where it will enhance and maintain vitality creates the need to think and plan ahead rather than focus on the existing position. The Plan must contain mechanism by which a settlement that is assumed to function a key role in meeting housing needs is able to grow sustainably when opportunities for housing become available for development.	Yes
129/01/CS/LC/US2-3	Stuart Booth	HWPC Planning on behalf of Aldcliffe Hall Estates	Strategic Policies & Land Allocations DPD	Chapter 07	SP 02 SP 03	N/A	LC	US/2 US/3	In terms of listed sustainable settlements contained in Policy SP2, the village of Aldcliffe should be considered. Previous planning applications and appeal decisions have considered the eastern side of the village as in a sustainable location. This was based on the benefits of the areas as a potential location for new development and its proximity to the city, which is in short walking distance.  In addition to the inclusion of Aldcliffe as a sustainable settlement, we propose that a specific site is considered for development, although an assessment of the village and capacity for growth has never been undertaken as the Council do not acknowledge Aldcliffe as a sustainable location.	It would appear that the Council are reluctant to define Aldcliffe as a sustainable settlement despite its close location to the city centre, train station and footpaths. To disregard the village in this way would be unsound as it's a potential location for delivering new homes which has not been considered during the preparation of the plan. We proposed the village be defined as a sustainable settlement via Policy SP2.	Yes
139/01/CS/LC/US1-4	Paul Tunstall	HWPC Planning on behalf of TNPG Sandeman Trust and M Capital Developments	Strategic Policies & Land Allocations DPD	Chapter 07	SP 02 SP 03	N/A	LC	US/1 US/2 US/3 US/4	The Local Plan recognises that Lancaster District is one of the least densely populated in Lancashire. It recognises that opportunities for new development are somewhat restricted which the Council uses as a reason to release Green Belt and most significantly justify for not meeting the OAN. In addition, the constrained infrastructure is highlighted as a limiting factor on growth and acknowledges that the Plan must be the tool with which to improve things in this regard. Having considered all options for growth the Plan concludes that in the context of these constraints that the plan is unable to deliver evidence growth, in such circumstances it must surely be appropriate to either revise the plan strategy or adapt it with additional standalone steps).  The planning authority seem abundantly clear that there are no more sites within the district that could be allocated for development that meet with the chosen growth strategy. If this was to remain the position at submission there serious questions must be asked in relation to soundness and whether the proposed growth strategy is the correct strategy when considered against the reasonable alternatives. On this basis the plan is not sufficiently justified and is not positively prepared.  The site has not been assessed under the terms of the SHELAA and therefore may present as a suitable site for allocation. This further calls into question whether the plan would pass the test of soundness in relation to being justified. [Further detail provided in the representatives full response.]	Land at Home Farm, Ellet is not constrained by any of the environmental designations that cover the district and as such should surely be given detailed consideration as to whether it should be allocated for development.  The site has not been assessed under the terms of the SHELAA and therefore may present as a suitable site for allocation. This further calls into question whether the plan would pass the test of soundness in relation to being justified.	Yes
149/01/CS/LC/NLCS/6/US2-4	Tamsin Hartley	On behalf of the Forest of Bowland AONB Parish Councils	Strategic Policies & Land Allocations DPD	Chapter 07	SP 02 SP 03	N/A	NLC/6	US/2 US/3 US/4	<b>Representation refers to Duty to Cooperate Matters</b>  The 2011 Duty to Cooperate requires constructive and active engagement on cross boundary issues. There has been no contact made with the Forest of Bowland (Lancaster District) communities or even their representative parish councils in order to discuss specific issues to the Forest of Bowland AONB. This stands in marked contrast to the amount, detail and quality of the contact made with communities and their representatives in the Arnside & Silverdale AONB. This differential treatment is inexplicable and unacceptable given the same national legislation and guidance covers all AONBs. Given the proportion of the district that falls into the Forest of Bowland, and the national importance of an AONB designation, it is our belief that the process for preparation of this DPD has therefore been inadequate and breached the Duty to Cooperate requirements.	The positive and strategic approach now taken to planning issues in the Arnside & Silverdale AONB resulted from the direct instruction by the Planning Inspector at a Local Plan Examination. We would request that a clear instruction is provided to create a parallel positive and strategic approach for the Forest of Bowland AONB which meet national planning policy requirements. Our expectation is that over a defined period a comparable supplementary planning document should be produced for the Forest of Bowland that work to protect / conserve its own unique character in conjunction with its local communities. An interim position statement pointing forward to this document should be produced that takes a lead from national planning policy as required. As part of this process it is expected that cross-boundary working would be substantially strengthened and improved.	Yes

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Intent) ATTENDING EXAMINATION
051/07/SP3/LC/US1-4	Dan Mitchell	Barton Willmore on behalf of H20 Urban LLP	Strategic Policies & Land Allocations DPD	Chapter 07	SP 03	N/A	LC	US/1 US/2 US/3 US/4	<p>Our client is supportive of the Council's approach to development, however we do not consider the identified 'urban-focused approach' is generally correct. The Council's approach is supplemented by large strategic greenfield release. The Council have sought to supplement this approach through regeneration but due to the limited opportunities it is essential that large scale strategic greenfield release takes place.</p> <p>It is our view that land to the South of Carnforth in needed to meet future housing needs, it is identified as a main town for growth, there are no existing brownfield sites within Cagrnforth and the land does not fulfil a Green Belt function.</p> <p>It is noted in paragraph 7.24 that the Council expects high density housing in the future, this approach is not substantiated and clarification is required.</p>	No suggested amendments made.	Yes
167/07/SP3/LC/US1&3	Hannah Walker	Barton Willmore on behalf of SCP Consulting Ltd	Strategic Policies & Land Allocations DPD	Chapter 07	SP 03	N/A	LC	US/1 US/3	<p>Our client generally support the development strategy and the specific reference to the need to release large strategic greenfield sites on the edge of Lancaster and Carnforth to meet development need. However our client is concerned that the Council has only released greenfield land to meet future housing needs of Carnforth and disregarded the need to release greenfield land to meet future employment needs.</p>	To align with the economic strategy the Council need to release greenfield land for employment, not just housing. The policy as draft is therefore ineffective.	Yes
106/12/SP3/LC/US2-3	Craig Barnes	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 07	SP 03	N/A	LC	US/2 US/3	<p>Our client supports the Council's acknowledgement within Policy SP3 of the need for development in locations outside the main four towns of the district. The Council identify sustainable villages at which proportionate growth will be allowed to respond to the housing needs in rural areas of the district.</p> <p>Whilst our client accepts the weight which is placed on maintaining the landscape quality of its AONBs in the context of major development, the Council must not use this designation solely as a reason not to meet development needs in these areas. The Council should plan positively to secure the sustainability of these areas and define locations where growth would be accepted, providing the policy framework to ensure that such development in balance with landscape quality. [Further detail provided in the representatives full response.]</p>	No suggested amendments made.	Yes
059/01/SP3/LC/US2	Eddie Taylor	Edward Taylor Planning and Design on behalf of Wray Parish Council	Strategic Policies & Land Allocations DPD	Chapter 07	SP 03	N/A	LC	US/2	<p>The policy is justified because it is not the most appropriate strategy when considered against reasonable alternatives. The current strategy is based on the idea that outside of the top 4 locations in Lancaster, in certain identified areas housing should be restricted to that which meets a localised need of th district while other areas should be regarded as a focus for growth. Furthermore there is no meaning in national policy to the term 'sustainable development' and the poor definition of this in the Sustainable Settlement Review and lack of settlement boundaries mean the Local Plan is unclear and not consistent with paragraph 15 of the NPPF.</p> <p>Further detailed submission is made which seeks to dispute the methodology and findings of the 2018 Sustainable Settlement Review in relation to the findings for the village of Wray. This can be read in more detail via the representatives full response.</p>	<p>Given the problems with the methodology outlined in the representation, a reasonable alternative strategy would be:</p> <p>The top 4 towns remain the focus for growth</p> <p>For the rural areas, sustainable settlements should be removed.</p> <p>For rural areas, where a Neighbourhood Plan has been prepared and includes a growth strategy for the Parish then this should form the basis for determining development in these areas.</p> <p>Those rural settlements in AONBs should be explicitly exempt from being expected to be the focus for growth on the grounds of paragraph 14 of the NPPF.</p> <p>This is more reasonable as it keeps the focus for growth in Lancaster, Morecambe, Heysham and Carnforth. It removes the sustainable settlement altogether which is poorly defined, gives appropriate weight to neighbourhood plans and their growth strategies and gives appropriate weight to AONBs.</p>	Yes
054/01/SP3/LC/US1&3	Chris Garner	Garner Planning on behalf of Russell Arner Ltd	Strategic Policies & Land Allocations DPD	Chapter 07	SP 03	N/A	LC	US/2 US/3	<p>The size of the existing population should not be a determinant of the level of growth but the availability of services. All rural Sustainable Settlements are dependent on services provided in Lancaster, Morecambe, Heysham and Carnforth to differing degrees, depending on the level of services available in the village. The location of the settlement in relation to these main urban areas should be a key determinant to the level of growth acceptable.</p>	Delete the 6th paragraph commencing 'In general the scale...'	Yes
050/04/SP3/LC/5	Emily Hrycan	Historic England	Strategic Policies & Land Allocations DPD	Chapter 07	SP 03	N/A	LC	5	<p>Given the high number of heritage assets in the district, we welcome the policy recognition that in allocating land for development, great weight will be given to the historic environment.</p>	No suggested amendments made.	
169/03/SP3/LC/5	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Strategic Policies & Land Allocations DPD	Chapter 07	SP 03	N/A	LC	5	<p>We support the principle of focusing development on the main urban areas such as Lancaster, including strategic greenfield sites for housing and development, particularly Bailrigg Garden Village.</p>	In order to ensure that Policy SP3 is sound and positively prepared, the wording should be revised to reflect the need for service provision as part of these new strategic sites.	Yes
019/02/SP3/LC/US1-4	Tony McAteer	McAteer Associates Ltd	Strategic Policies & Land Allocations DPD	Chapter 07	SP 03	N/A	LC	US/3 US/4	<p>Eccleston Homes support the Council in recognising that development needs cannot be purely met on only previously developed sites and that greenfield sites are necessary to meet future needs. Whilst there is support for this approach Eccleston Homes disagree that the strategy should only be supplemented by large greenfield sites. If development needs are to be met a range of site sizes will be required.</p>	Reference should be made in Policy SP3 that smaller greenfield sites will be used to supplement the release of larger strategic greenfield sites.	No
107/02/SP3/LC/US1-4	Graham Love	Smith & Love Planning on behalf of J & S Lamb	Strategic Policies & Land Allocations DPD	Chapter 07	SP 03	N/A	LC	US/1 US/2 US/3 US/4	<p>We disagree that the potential for new housing in Glasson Dock should be limited to proven local needs only. Given my clients view that Glasson Dock should be considered as a sustainable settlement in Policy SP2 the growth of housing development should be supported in the local plan to meet wider needs. [Further detail provided in the representatives full response.]</p>	Policy SP3 should make clear that development in Glasson Dock will not be limited to that which meets evidenced local needs only in the event that the settlement remains classified as Rural Village and market housing will be supported due to the availability of key services.	Yes
163/05/SP3/LC/5	David Diggle	Turley on behalf of Peet Holdings Investments	Strategic Policies & Land Allocations DPD	Chapter 07	SP 03	N/A	LC	5	<p>Whilst Peet support the proposed development strategy, it must not be interpreted in practice as simply 'prioritising' the delivery of brownfield land. As the Council acknowledge, simultaneous delivery from both brownfield and greenfield sources will be required to secure the sustainable future for the district. [Further detail provided in the representatives full response.]</p>	No suggested amendments made.	Yes
030/01/SP3/NLCS/US2-4	Helen Binn	Walsingham Planning on behalf of KCS Development Ltd	Strategic Policies & Land Allocations DPD	Chapter 07	SP 03	N/A	NLCS	US/2 US/3 US/4	<p>Whilst in general the development strategy for the district is welcomed objection is raised to the strategic site in South Camforth. Its allocation is considered to be inappropriate due to its Green Belt status. Its allocation is considered inappropriate as it result s in reliance being placed upon a single large site for delivery of majority of Camforth's housing requirement. There are alternative, more sustainable sites, elsewhere in Camforth which do not lie within the designated Green Belt.</p>	To remove the housing allocation SG12 from the Local Plan.	No
108/02/SP3/7.18/LC/US1-4	Graham Love	Smith & Love Planning on behalf of G & M Parker	Strategic Policies & Land Allocations DPD	Chapter 07	SP 03	7.18	LC	US/1 US/2 US/3 US/4	<p>Notwithstanding the differences between the proposed wording in paragraph 7.18 of the plan and paragraph 115 of the NPPF, the approach is not made clear in the policy text, implying the growth will only be supported according to landscape capacity. A landscape capacity approach is not defined and is not consistent with national policy.</p> <p>Whilst the primary purpose of the AONB designation is to conserve and enhance natural beauty, it is acknowledged that account should be taken of economic and social needs of communities in pursuing that primary purpose.</p> <p>As the most accessible and sustainable settlement in the western part of the Forest of Bowland AONB, Caton should provide a focus and opportunity for a sufficient scale of growth through the plan period. [Further detail provided in the representatives full response.]</p>	Detailed working amendments to both Policy SP3 and paragraph 7.18 can be read in detail within the representatives full response.	Yes
126/01/CI3/LC/US2	Val Funnell	N/A	Strategic Policies & Land Allocations DPD	Chapter 08	N/A	N/A	LC	US/2	<p>Why build 3,500 houses in South Lancaster where there are not 7,000 jobs available?</p>	Prepare a Local Plan which reflects job opportunities in South Lancaster rather than exaggerated assumptions of job growth.	No
051/08/SP4/LC/5	Dan Mitchell	Barton Willmore on behalf of H20 Urban LLP	Strategic Policies & Land Allocations DPD	Chapter 08	SP 04	N/A	LC	5	<p>Our client continues to support the economic aspirations of the district, we note and welcome an update to the Council's Employment Land Review in 2017 and this will help ensure that the evidence base which the Council relies on can be found sound.</p>	No suggested amendments made.	Yes
167/08/SP4/LC/US1&3&4	Hannah Walker	Barton Willmore on behalf of SCP Consulting Ltd	Strategic Policies & Land Allocations DPD	Chapter 08	SP 04	N/A	LC	US/1 US/3 US/4	<p>In general our client support the Council's aspirations to support sustainable economic growth in the district. Notwithstanding this, our client notes that the policy is heavily focused on delivering economic growth in Lancaster, Morecambe and Heysham with no reference to Carnforth. As set out in the plan which reflects the conclusions of the employment evidence provided by Turley and focuses on schemes being promoted by the Lancashire LEP and key employment stakeholders in the district. There is no reference to the employment needs of Carnforth or any discussions with the local business community.</p> <p>It is clear that Carnforth has an important role to play in delivering sustainable economic growth in the north of the district. Our client does not doubt that the Council has worked within the County Council and LEP to understand their business needs in Lancaster, however the Council have failed to give due consideration to the needs of the local business community in line with the requirements of Paragraph 160 of the NPPF.</p> <p>Our client has received numerous letters from local businesses in Carnforth expressing an interest to relocate their existing businesses to land at Kallet Road (land in our clients ownership). The lack of suitable alternative sites was cited as a key reason for their interest. It is evident from the Council's evidence base that businesses such as these have not been considered in the preparation of the Local Plan. [Further detail provided in the representatives full response.]</p>	In this context, for consistency and effectiveness of the Plan, Policy SP4 should be expanded to recognise Carnforth as a key location for economic growth within the district.	Yes
106/13/SP4/LC/5	Craig Barnes	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 08	SP 04	N/A	LC	5	<p>Our client is supportive of the Council's strategy for economic growth as set out in Policy SP4 of the Local Plan. The policy refers to a wide range of investment opportunities across the district and within different sectors which hold a realist prospect of being achieved within the plan period. The delivery of these Economic Growth priorities will go a long way to meet the level of economic growth sought by the Council in its vision and objectives.</p>	No suggested amendments made.	Yes
148/04/SP4/LC/5	Jon Power	CBRE on behalf of Lancaster University	Strategic Policies & Land Allocations DPD	Chapter 08	SP 04	N/A	LC	5	<p>The University supports the identification of the City's economic growth priorities and specific recognition of the University. Reference to the Health Innovation Campus is also strongly supported. The University considered that the policy should include details regarding the types of opportunity offered by the site. Notably educational, university-related and health related uses should be specifically referenced.</p> <p>The University supports the recognition set out in paragraph 8.10 that there is significant strength the district. The identification of high value sectors is also supported. However, the text should specifically identify the University as a major driver in the delivery of these projects.</p>	Specific reference should be made to the types of uses offered by the Health Innovation Campus. References should be made to the University as a key driver in a number of economic projects in the district.	Yes
155/02/SP4/LC/5	Paul Nellist	HOW Planning on behalf of Taylor Wimpey	Strategic Policies & Land Allocations DPD	Chapter 08	SP 04	N/A	LC	5	<p>Taylor Wimpey supports the sustainable economic growth of Policy SP4 which includes growing the retail and cultural offers of Morecambe and Lancaster, supporting the growth of the Port of Heysham, South Heysham and the Heysham Gateway, assisting the growth of Lancaster University Innovation Park and supporting the sustainable growth of the district's higher education establishments.</p>	No suggested amendments made.	Yes
169/04/SP4/LC/US1	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Strategic Policies & Land Allocations DPD	Chapter 08	SP 04	N/A	LC	US/1	<p>The Council's pursuit of sustainable economic growth is support by CEP, the scale of retail and service provision delivered through a new district centre at Scoforth Road would create a number of local employment opportunities. Similarly the construction of the Garden Village would provide a significant number of jobs.</p> <p>However, Policy SP4 solely focuses on the economic benefits derived from specific economic sectors across the district. We request that in order for Policy SP4 is positively prepared, the policy should be expanded to reflect the economic benefits of the construction of the Garden Village, including operational jobs which would be delivered through a new district centre.</p>	The policy should be expanded to reflect the economic benefits of the construction of the Garden Village, including operational jobs which would be delivered through a new district centre.	Yes
163/06/SP4/LC/5	David Diggle	Turley on behalf of Peet Holdings Investments	Strategic Policies & Land Allocations DPD	Chapter 08	SP 04	N/A	LC	5	<p>Peet support the priorities for economic growth outlined in Policy SP4. It is considered that the growth of the University Campus and Innovation Campus will be important in raising the profile of Lancaster.</p>	No suggested amendments made.	Yes
160/01/CI3/LC/US2-4	David Adams	Axis PED Ltd	Strategic Policies & Land Allocations DPD	Chapter 08	SP 04 SP 05	N/A	LC	US/2 US/4	<p>We support that the Plan has been prepared to directly facilitate the economic growth. This is in line with the NPPF. However it is consider that the current wording of the policy is unsound insofar as it does not recognise the addition to the employment allocations at the Heysham Gateway and across the district.</p> <p>The current wording is therefore not considered to be consistent with Section 1 of the NPPF. The development of the Heysham Gateway for other compatible uses such as those which are promoted through the Waste and Minerals Plan would equally serve to facilitate economic growth.</p> <p>We therefore consider this strategy to necessarily be justified as it places an over reliance on securing economic growth through the development of employment units in locations where growth could be better achieved through encouraging other complementing uses. [Further detail provided in the representatives full response.]</p>	It is acknowledged that the County Plan deals with the allocation of sites for waste and minerals development. However, greater clarity and flexibility should be provided in SP4 and SP5 to acknowledge that economic growth could come forward through development opportunities other than those specifically allocated under Policy EC1. The allocation of sites through the Waste and Minerals Local Plan are essential in helping the district achieve economic growth.	Yes
148/22/CI3/LC/5	Jon Power	CBRE on behalf of Lancaster University	Strategic Policies & Land Allocations DPD	Chapter 08	SP 04 SP 05	N/A	LC	5	<p>Lancaster University supports the Council's general approach it its Local Plan which seeks to meet the ambitious growth aspirations of the district, and in particular South Lancaster, and is supportive of the Plan in principle.</p> <p>However as part of this growth and in order to deliver a sound plan, it is essential that there is recognition whilt the policy framework that the City must support the university in enhancing its status through continued investment in academic teaching space, student accommodation and research to attract students and leading academics.</p>	No suggested amendments made.	Yes
055/01/CI3/LC/US1-4	Professor Stephen Constantine	CLOUD - Citizens of Lancaster Against Unnecessary Development	Strategic Policies & Land Allocations DPD	Chapter 08	SP 04 SP 05	N/A	LC	US/1 US/2 US/3 US/4	<p>CLOUD are supportive of the Planning Authority's view that economic growth is a policy priority within the plan period. However, policies are of a high level and are vague on quantifying how employment growth will be achieved. Furthermore it does nothing to evaluate the threats to the economic (for example the departure from the EU) in terms of potential job losses and ignores the jobs losses in the retail industry.</p> <p>The impact of the Local Plan on the economy is too important not to provide an evidence-based quantification of job opportunities. Moreover, such an evidence base should identify the nature of proposed opportunities. Such issues affect other policy areas such as flooding and infrastructure which should be the main driver in allocating land and the location of housing.</p> <p>The Local Plan asserts that the Lancaster University Health innovation Campus has the potential to delivery 2,000 new jobs, but the plan does not indicate the time period over which this will be created. The Council have also placed an assumption over potentially 3,000 new jobs being created at the University and 4,000 new students over the next decade. The Authority are placing a great deal of reliance on the university as an engine for growth.</p> <p>Accordingly we feel that plans for economic growth are not based on an objective evidenced based which is also out of date. The authority should provide far greater evidence, including evidence from major employers such as the university. [Further detail provided in the representatives full response.]</p>	Provision of evidence to justify the numbers of new jobs forecast in the Local Plan and their location; and evidence from Lancaster University on expected jobs growth from the Health Innovation Campus and future student and staff numbers.	Yes
055/01/CI3/LC/US1-5	Professor Stephen Constantine	CLOUD - Citizens of Lancaster Against Unnecessary Development	Strategic Policies & Land Allocations DPD	Chapter 09	SP 04 SP 06	N/A	LC	US/1 US/2 US/3 US/5	<p>CLOUD are supportive of the Planning Authority's view that economic growth is a policy priority within the plan period. However, policies are of a high level and are vague on quantifying how employment growth will be achieved. Furthermore it does nothing to evaluate the threats to the economic (for example the departure from the EU) in terms of potential job losses and ignores the jobs losses in the retail industry.</p> <p>The impact of the Local Plan on the economy is too important not to provide an evidence-based quantification of job opportunities. Moreover, such an evidence base should identify the nature of proposed opportunities. Such issues affect other policy areas such as flooding and infrastructure which should be the main driver in allocating land and the location of housing.</p> <p>The Local Plan asserts that the Lancaster University Health innovation Campus has the potential to delivery 2,000 new jobs, but the plan does not indicate the time period over which this will be created. The Council have also placed an assumption over potentially 3,000 new jobs being created at the University and 4,000 new students over the next decade. The Authority are placing a great deal of reliance on the university as an engine for growth.</p> <p>Accordingly we feel that plans for economic growth are not based on an objective evidenced based which is also out of date. The authority should provide far greater evidence, including evidence from major employers such as the university. [Further detail provided in the representatives full response.]</p>	Provision of evidence to justify the numbers of new jobs forecast in the Local Plan and their location; and evidence from Lancaster University on expected jobs growth from the Health Innovation Campus and future student and staff numbers.	Yes

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Inter) ATTENDING EXAMINATION
073/01/C8/LC/US1	Mary Breakell	N/A	Strategic Policies & Land Allocations DPD	Chapter 08	SP 04 SP 05	N/A	LC	US/1	The Turley report appears to use Experian estimates - to what extent is the employment growth specific to the district? Are they based on the North West average? What assumptions are being made for the displacement due to the Northern Powerhouse which will attract jobs to the M62 corridor? How much of the growth and demand for housing generated by economic growth? Is the anticipated growth in employment on a residence or workplace resident?  I am concerned by the forecast and projections contained in the Turley Report which underpin the Local Plan, the implications they have for development in Lancaster and the Garden Village in particular. There is an underlying assumption that Bailrigg Garden Village is a 'given' and there has been no consultation over whether we want it and no apparent Plan B. Since the first drop in sessions in early 2017 there appears to have been very little progress or clearer understanding, boundaries have changed without any clear explanation of why. I am not against development but I am against development that seems to be based on flimsy evidence and where residents lack vital information.	Realistic housing need projections would be a major first step to a more balanced local plan. It is impossible to have an informed view of the proposed Garden Village because so little detailed evidence is provided. Given this represents such a large element of the Local Plan I believe it should be withdrawn until full evidence of all costs and implications are available.	No
095/01/C8/LC/US2	Ralph Prior	N/A	Strategic Policies & Land Allocations DPD	Chapter 08	SP 04 SP 05	N/A	LC	US/2	Building 3,500 houses on a greenfield site in South Lancaster needs some considerable justification. Where is the demand for this additional housing? The projections for economic growth via the University and Hospital must be questioned. Building houses does not create jobs on its own and without them development of this kind will lead to more commuting.	Review is needed of the estimates underlying the employment projections to better reflect local conditional and hence future housing demand.	No
092/01/C8/LC/US1-2	Robert Fildes	N/A	Strategic Policies & Land Allocations DPD	Chapter 08	SP 04 SP 05	N/A	LC	US/1 US/2	The economic development of Lancaster and in particular the prediction of 5,500 new jobs is supported by any substantial arguments or data. The evidence provided is out-of-date and not well founded. The projections for the retail sector are now hopelessly out of date with sector contracting. The employment forecasts are too reliant on the Health Innovation Campus.  The developments envisaged in the DPD are wholly dependent on forecasts which have not been justified to a professional standard so they need to be revisited.	The employment forecast should be revisited using external consultants whose report would be available for rigorous examination.	No
051/09/SP5/LC/5	Dan Mitchell	Barton Willmore on behalf of H20 Urban LLP	Strategic Policies & Land Allocations DPD	Chapter 08	SP 05	N/A	LC	5	Our client is supportive of the need to encourage and promote positive economic growth in the district. However, whilst a number of employment areas have been identified it is felt that employment opportunities should not be restricted to these locations.	No suggested amendments made.	Yes
148/05/SP5/LC/5	Jon Power	CBRE on behalf of Lancaster University	Strategic Policies & Land Allocations DPD	Chapter 08	SP 05	N/A	LC	5	The specific reference to the Health Innovation Campus is strongly supported.	No suggested amendment made.	Yes
155/03/08/LC/US3	Paul Nellist	HOW Planning on behalf of Taylor Wimpey	Strategic Policies & Land Allocations DPD	Chapter 08	SP 05	N/A	LC	US/3	Taylor Wimpey consider that the requirement for 2 hectares of B1 office use on the North Lancaster Strategic Site has not been robustly demonstrated and the Council should investigate whether it could be better accommodated by utilising existing assets / floorspace or meeting demand at more suitable locations for this type of use. In this context, a balance must be struck between the need to allocate suitable and deliverable residential sites of a sufficient quantum without being prejudiced by requirements to accommodate other land uses.	The Council should consider alternative locations for employment other than that of the North Lancaster Strategic Site.	Yes
169/05/SP5/LC/US1-3	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Strategic Policies & Land Allocations DPD	Chapter 08	SP 05	N/A	LC	US/1 US/2 US/3	ECIP supports and considers broadly sound the Council's encouragement of positive economic growth. However, Policy SP5 should be expanded to include specific reference to the economic benefits associated with the delivery of the Garden Village, including both construction and operational jobs.  Policy SP5 identifies a new 'South Lancaster Business Park' as one of several key locations for new jobs, but latterly explains that potential for such a facility will only be investigated through the Bailrigg Garden Village Area Action Plan DPD. Indeed no specific allocation is included. It is therefore unusual to include such a vague commitment within Policy SP5 at this time.	The commitment to a South Lancaster Business Park should be removed from Policy SP5.	Yes
167/09/SP5&LC2/LC/US1&3&4	Hannah Walter	Barton Willmore on behalf of SCP Consulting Ltd	Strategic Policies & Land Allocations DPD	Chapter 08	SP 05 EC 02	N/A	LC	US/1 US/3 US/4	The employment requirements which are set out in Policies SP5 and EC2 are different and do not align. To ensure that the plan is effective and to avoid unnecessary policy making the policies should be streamlined into one overarching policy including both the requirement and allocations within the site areas identified. Alternatively Policy SP5 should set out the overarching employment land requirement and Policy EC2 should seek to identify sites.  The supporting text to Policy SP5 confirms that the requirement of 48.9ha is based on evidence derived from the Employment Land Review, produced by Turley, from 2015. Turley suggests the Council should allocate between 49.5 and 53.5 hectares of land suitable for B class employment over the plan period. In this context the Council should be allocating 53.5 hectares of employment land as a minimum which would align with Council economic growth aspirations. The current requirement falls below the recommended requirement and the Council have not provided any sound justification as to why they have gone against this recommendation. As such Policy SP5 conflicts with the NPPF to proactively drive and support economic growth. The impacts of the 2014 SNPP should be modelled to understand whether there would be any changes in demand arising from this data.  Canforth Business Park has been removed from the allocation of Policies SP5 and EC2 which is welcomed. However, our client remains concerned that there is a lack of alternative sites to attract new business and allow local businesses to grow. This has the potential to stall economic growth in Canforth. As demonstrated by our representation the Council should be allocating further employment land in Canforth with our client's land on Kettle Road being identified for such a purpose. [Further detail provided in the representatives full response.]	Land at Kettle Road should be identified to meet employment needs in Canforth via Policies SP5 and EC2.	Yes
051/10/SP4/LC/US1-4	Dan Mitchell	Barton Willmore on behalf of H20 Urban LLP	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/1 US/2 US/3 US/4	It is our clients position that the Council should increase the OAN to a minimum of 617 dwellings per annum, across the plan period up to 2033 / 2034. This is to ensure the Council meets the full, objectively assessed needs of the district, as evidenced in the OAN verification report. To achieve this, land release is required as that Council needs to ensure that all the proposed sources of supply are deliverable. A buffer between 10% - 20% is required because the proposed buffer of 56 dwellings in SP6 is not robust and makes no effort to provide a contingency mechanism in the event of under-delivery. [Further detail provided in the representatives full response.]	The housing requirement figure should be a minimum and not maximum figure and a further three years add to the housing requirement plan period. This should be reflected through an additional 1,566 dwellings (as a minimum) up to 2033. [Further detail provided in the representatives full response.]	Yes
106/14/C8/LC/US1-4	Craig Barnes	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/1 US/2 US/3 US/4	Policy SP6 is clearly inconsistent with the NPPF. It is ineffective in meeting the housing needs of the Council, is inconsistent with national planning policy by proposing a methodology of meeting housing provision which is not recognised by planning policy guidance, is not positively prepared by not dealing with at least 1,656 dwellings of unmet need post plan period. The delivery concerns of the Council are not appropriately justified and little regard has been given to alternative methods of meeting housing need, other than the Council's preferred approach. Our client holds clear concerns with the deliverability of the Local Plan as drafted. The most fundamental reasons for this are:  The absence of any buffer in the housing supply relative to the housing requirement. Optimistic assumptions made without any clear justification for the commencement and delivery of strategic sites. The absence of an allowance made within the supply for the lapse of planning permissions. The lack of evidence to support the capacity assumptions of identified development opportunities. The lack of justification for the ratio of home to student beds for student flats in the supply for the assumption that they will free up housing stock and lack of consideration of the Universities growth over the plan period. The reliance of completions from Neighbourhood Planning Areas without regard for the proposed strategy of these Neighbourhood Plans and the potential growth provided in designated areas. The use of skewed evidence to justify windfall allowance. The lack of any detail of how high density development will be achieved in the district over the plan period without double counting existing sources of supply. [Further detail provided in the representatives full response.]	Our client considers that there is a desperate need to include additional sites of smaller and medium sized capacity which can be delivered earlier in the plan period. In addition we recommend the following actions:  Review of the proposed allocations to consider capacity for high densities subject to constraints. Review of trajectory sites with further evidence to justify delivery rates. Inclusion of a lapse rate of at least 10% for committed sites. Provide evidence on student housing in Lancaster in terms of occupation and consider further growth needs of both Universities. Define the housing requirement to be met in Neighbourhood Plan areas additional to committed developments. Remove development opportunity sites from the housing trajectory and include any future provision from these sites as windfall development. Provide further justification as to how high-density developments could be achieved in the district, including potential design codes for areas within the district allowing for higher density development. Identify further sites adjoining the urban towns and sustainable villages to meet short and long term housing needs. Review the North Lancashire Green Belt for further sites especially around sustainable settlements.  As set out in previous representation, our client is firmly of the view that the plan period should be extended from 2031 to 2034. Should such an extension be included in the plan this would result in the need for at least 14,191 dwellings through the plan period.	Yes
106/14/C8/LC/US1-5	Craig Barnes	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 10	SP 07	N/A	LC	US/1 US/2 US/3 US/5	Policy SP6 is clearly inconsistent with the NPPF. It is ineffective in meeting the housing needs of the Council, is inconsistent with national planning policy by proposing a methodology of meeting housing provision which is not recognised by planning policy guidance, is not positively prepared by not dealing with at least 1,656 dwellings of unmet need post plan period. The delivery concerns of the Council are not appropriately justified and little regard has been given to alternative methods of meeting housing need, other than the Council's preferred approach. Our client holds clear concerns with the deliverability of the Local Plan as drafted. The most fundamental reasons for this are:  The absence of any buffer in the housing supply relative to the housing requirement. Optimistic assumptions made without any clear justification for the commencement and delivery of strategic sites. The absence of an allowance made within the supply for the lapse of planning permissions. The lack of evidence to support the capacity assumptions of identified development opportunities. The lack of justification for the ratio of home to student beds for student flats in the supply for the assumption that they will free up housing stock and lack of consideration of the Universities growth over the plan period. The reliance of completions from Neighbourhood Planning Areas without regard for the proposed strategy of these Neighbourhood Plans and the potential growth provided in designated areas. The use of skewed evidence to justify windfall allowance. The lack of any detail of how high density development will be achieved in the district over the plan period without double counting existing sources of supply. [Further detail provided in the representatives full response.]	Our client considers that there is a desperate need to include additional sites of smaller and medium sized capacity which can be delivered earlier in the plan period. In addition we recommend the following actions:  Review of the proposed allocations to consider capacity for high densities subject to constraints. Review of trajectory sites with further evidence to justify delivery rates. Inclusion of a lapse rate of at least 10% for committed sites. Provide evidence on student housing in Lancaster in terms of occupation and consider further growth needs of both Universities. Define the housing requirement to be met in Neighbourhood Plan areas additional to committed developments. Remove development opportunity sites from the housing trajectory and include any future provision from these sites as windfall development. Provide further justification as to how high-density developments could be achieved in the district, including potential design codes for areas within the district allowing for higher density development. Identify further sites adjoining the urban towns and sustainable villages to meet short and long term housing needs. Review the North Lancashire Green Belt for further sites especially around sustainable settlements.  As set out in previous representation, our client is firmly of the view that the plan period should be extended from 2031 to 2034. Should such an extension be included in the plan this would result in the need for at least 14,191 dwellings through the plan period.	Yes
055/02/C8/LC/US1-4	Professor Stephen Constantine	CLOUD - Citizens of Lancaster Against Unnecessary Development	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/1 US/2 US/3 US/4	The Local Plan places an excessive emphasis on the provision of new housing, particularly in relation to the creation of new jobs. There is a clear mismatch between the delivery of new houses (12,000) and the creation of new jobs (9,500), meaning that an increasing number of Lancaster residents will be required to commute to employment. This conflicts with the NPPF.  It is essential that the Local Plan concentrate more on job creation (especially high quality employment) and on economic regeneration and less on house building if it is to be effective. The NPPF sets a target of achieving the target of a strong and competitive economy, this won't be met by building more housing in a location which is already one of the most affordable in the country (as identified in the Affordable Cities Review). The Local Plan records that 2,070 houses were completed over the 5 year period of 2016/17 (415 dwellings per annum). Over a longer period of 10 years the average number of homes built per year was 250. The historic rate of house building has been sufficient to meet local housing need, confirmed by the fact that housing in Lancaster is amongst the more affordable in the country. The Local Plan claims that Lancaster has a requirement for 522 dwellings per annum, well above actual completions in recent years. The question arises to to why this figure is needed, given the clear evidence on affordability. This needs to be resolved and explained to local residents before the Local Plan is taken forward.  The Local Plan sets targets for the delivery of new affordable housing, in the case of the Garden Village house builders will be first expected to contribute to its high infrastructure costs, so reducing profitability. This in turn will make them less willing or able to provide affordable housing. This must call into question the Council's ability to meet targets for affordable housing. [Further detail provided in the representatives full response.]	Provision of robust, evidence-based data to justify the high house-building target in the Local Plan.	Yes
085/01/C8/LC/US1-4	Andrew Teague	Cushman & Wakefield on behalf of Edmund Metcalfe	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/1 US/2 US/3 US/4	Lancaster Local Plan has clearly not met its Duty to Cooperate with regards to Wyre, who have requested assistance on meeting their own OAN. The Plan cannot be considered to be positively prepared and thus cannot be considered sound unless additional sites are allocated for housing. Further consideration should therefore be afforded to the allocation of additional land in sustainable locations for residential led development.  We consider the proposed OAN to be insufficient because the Council have failed in their Duty to Cooperate with regards to assisting Wyre Council in meeting their own unmet need. Lancaster's OAN should be revised upwards to accommodate some of this unmet need. Land South of the A683 is capable of providing a sustainable extension that, significantly does not require land to be released from the Green Belt. The site is capable of delivering c. 1,500 dwellings and employment over the plan period.  We do not consider that all the proposed allocations are fully deliverable over the plan period and therefore lacks certainty over its deliverability. In particular Bailrigg Garden Village and the East Lancaster Strategic Site have constraints which will delay delivery.  Paragraph 47 of the NPPF requires authorities to significantly boost the supply of housing, to ensure the Plan is consistent with the Framework we considered that further strategic sites should be allocated, in particular south of the A683. [Further detail provided in the representatives full response.]	We do not consider that the current iteration of the Local Plan meets the tests of soundness as required via the NPPF. This situation can be easily rectified by the inclusion of further land allocations for residential development enabling the Council to meet its Duty to Cooperate requirements and maintain a flexible supply of land over the whole plan period. This will allow the Council to meet its OAN and boost the supply of housing in accordance with the NPPF.  We strongly maintain that further land, inclusive of Land to the South of the A683, should be allowed for residential led development to ensure the Local Plan can be found sound.	Yes
054/02/SP4/LC/US1-4	Chris Garner	Garner Planning on behalf of Russell Arner Ltd	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/1 US/2 US/3 US/4	The suggested housing requirement of 522 dwellings is below the evidenced OAN. The delivery of housing need background paper concludes that despite maximising opportunities for delivery there is an insufficient supply to meet the OAN. However, the SHLAA states that not all potential housing sites have been reviewed. If not all sites have been assessed then the Council cannot conclude they have maximised opportunities for delivery and there is an insufficient supply. There is no indication as to whether or not the planning authority have agreed that neighbouring authorities are able to accommodate the suggested shortfall. Policy SP6 can only establish the housing requirement after a full analysis of all housing opportunities.  The housing opportunities identified in the delivery table of SP6 lacks clarity for a number of reasons which are described in greater detail within the representatives full response.  The level of requirement which is reliant on strategic sites is significant, if none of these sites delivery housing completions before the end of the 5 year period then there will be a significant shortfall in completions. This is a high risk strategy that is likely to fail. Each of these sites have their own unique complications including access, land ownership which may frustrate and delay housing delivery in the short term. Specific comment is made by the representative in relation to the likely delivery of development at Bailrigg Garden Village, Canal Corridor, East Lancaster Strategic Site and the full range of Development Opportunity Sites.  Given the above complications, the plan should include smaller sites suitable for development by small and medium sized house builders that can deliver housing quickly. [Further detail provided in the representatives full response.]	Revise Strategic Development site policy reference so they match later site specific policies. Revise the table and housing trajectory so they have the same format and that anticipated housing completions can be easily understood. Use the same site name in the text as on the housing trajectory. Delete student accommodation as a sub-title as this does not relate to any specific site. Additional supply, including neighbourhood plan delivery, lacks clarity as to the precise contributions and other sources. Amend, break down and relate to the housing trajectory. Revise proposals maps to make Strategic Sites with the same references which appear in SP6. Revise Housing trajectory to assume that the earliest completion on strategic sites will not be until 2024/25 (i.e. 6-10 year period). Review housing completions for DCS1 - DCS11. Delete Canal Corridor as a site to yield housing completions. Prepare a whole new table with more realistic assumptions about housing delivery. Include more smaller housing sites suitable for development. Give further consideration to the housing requirement and consider an increase.	Yes
112/01/SP6/LC/US2-4	Chris Garner	Garner Planning on behalf of T Lloyd	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/2 US/3 US/4	The Local Plan does not identify sufficient housing to meet the Objectively Assessed Need or the lower figure of 522 dwellings per annum. The planning authority assume that all strategic housing sites will come forward during the planning period and every housing allocation will be completed in the plan period. It is considered that these are unrealistic assumptions.  To address this shortfall the Local Plan should provide additional flexibility by allocating a range of additional housing sites which includes land which has been formally identified in the 2015 People Homes and Jobs Consultation as UE2. This will assist in meeting the objective of sufficiently boosting housing supply. This is considered a sustainable location for new housing development. [Further detail provided in the representatives full response.]	Allocate land formerly identified as UE2 in the 2015 People Homes and Jobs consultation (land to the East of the M6) for housing purposes.	Yes

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Intert) ATTENDING EXAMINATION
146/04/SP6/NLC5/US1-4	John Fleming	Gladman Developments Ltd	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	NLC/5	US/1 US/2 US/3 US/4	Gladman recognise that Garden Villages and Urban Extensions can play an important role in delivering significant amount of housing to meet needs. It is of fundamental importance that the Plan is realistic in regards to the delivery assumptions and lead in times applied in relation to these sites and that an over reliance is not placed on their delivery.  The Council should avoid applying unrealistic assumptions to strategic sites as a means of absorbing significant housing number to artificially reduce the need for growth across the district. Whilst strategic sites may have multiple developers acting on the site, realistically these will only achieve 30 dwellings per developer on a site. It is unlikely that more than 3 developers will act on any one site due to market competition.  Although SP6 suggests that the Council will monitor and review the requirements for housing need within the district, there is no policy mechanism included within the Plan to ensure that any shortfall will be addressed. [Further detail provided in the representatives full response.]	To provide flexibility and contingency, Gladman believe it is necessary to include a suitable policy mechanism like the approaches which have been taken in Scarborough and South Derbyshire which have included the inclusion of additional housing allocations and a modified policy to ensure that new suitable opportunities would be allowed outside of settlement limits if at any time in the plan period the Council is unable to demonstrate a 5-year housing land supply.  The Plans should include a review policy which needs to be clear, understandable and effective, by setting achievable targets for the completion of the review. Specifically, the triggers for review need to be meaningful, have teeth and contain an end date that is in the control of Council. This policy should also include consequences for failing to meet the target dates, a good example of policy is North West Leicestershire's Local Plan.	Yes
146/10/SP6/NLC5/US1-4	John Fleming	Gladman Developments Ltd	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	NLC/5	US/1 US/2 US/3 US/4	Given the transitional arrangements outlined in the newly revised NPPF, Gladman remind the Council that the Plan will be tested against the requirements of the previous Framework. Notwithstanding our previous representations that the housing requirement contained in the Plan should be seeking to align itself with the upper end of the OAN range, upon the adoption of the Local Plan, the housing land supply must be assessed against the requirement of that plan (i.e. 522 dpa) in order for the plan to be found sound.  Gladman does not consider that the housing trajectory contained in this document provides sufficient evidence to demonstrate the Council can demonstrate a five year housing supply consistent with the requirements of the revised Framework with regards to the new definition of deliverable. [Further detail provided in the representatives full response.]	No suggested amendments made.	Yes
050/05/SP6/LC/US4	Emily Hyrcan	Historic England	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/4	The development of several of the sites included as allocations have been identified in the Heritage Impact Assessments as being likely to result in harm to elements which contribute to the significance of heritage assets in the vicinity. Where this is the case, these site assessments set out a series of measures which, if implemented, will either remove or reduce harm, and will ensure that the site is development in a manner that is consistent with preserving the historic environment. Because of the sensitive nature of these locations it is not sufficient merely to rely on general, non-site specific policies to address this matter. [Further detail provided in the representatives full response.]	The inclusion of an additional bullet point to the development proposals that refer to site specific mitigation / enhancement measures and design consideration outlined in the Heritage Impact Assessment document.	
151/03/SP6/LC/US1&4	Matthew Symons	Hollins Strategic Land	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/1 US/4	This policy states that the Council will seek to deliver a minimum of 12,000 new dwellings and the table within the policy confirms opportunities for housing at a total of 12,056. It is considered that the Council must plan for greater flexibility in order to ensure it significantly boosts housing.  It is of course acknowledged that such increases may result in the need for Green Belt release. However it is evidence that non-Green Belt land is available for development in sustainable locations, such as land off Preston / Lancaster Road, Galgate.	Greater flexibility is required through Policy SP6 and HQ through the allocation of further housing sites, including land at Preston / Lancaster Road, Galgate.	Yes
087/04/SP6/LC/US1-3	Joanne Harding	Home Builders Federation	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/1 US/2 US/3	Policy SP6 is not considered sound as it is not considered sound as it is not positively prepared, justified or effective for the following reasons.  The policy seeks to deliver a net minimum of 522 new dwellings per annum which is a reduction from previous consultations where the housing requirement was identified as an average of 675 dwellings per annum. The HBF are supportive of the policy wording in relation to the housing figure being a net minimum which provides clarity.  The 2018 OAN Verification study establishes the housing need for the district making use of demographic and economic data which suggest a range of scenarios which require the creation of between 584 and 617 dwellings per annum. The HBF consider that the Council should be planning for the housing requirements set out in their own evidence.  The Plan and supporting documentation set out the Council do not consider that there is sufficient housing land supply to meet the objectively assessed need in full. The HBF consider that there may be opportunities for further work with those in the housing industry to identify where there could be further supply available and developable in the plan period. [Further detail provided in the representatives full response.]	The HBF propose that the policy is modified so that the Council give further consideration to the housing requirement and the potential for it to be increased.	Yes
155/04/CS/LC/US1-4	Paul Nellist	HOW Planning on behalf of Taylor Wimpey	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/1 US/2 US/3 US/4	Taylor Wimpey fully support the delivery of new homes at the North Lancaster Strategic Site, which will be critical in meeting the housing needs of Lancaster and the Council should ensure that the policy seeks to maximise the housing capacity of the strategic allocation.  Notwithstanding this the supply of housing identified in Policy SP6 is significantly below the identified OAN. The Council must seriously consider the implications of not identifying sufficient land for housing and the harm that will result from failing to meet the need of Lancaster, such as slower economic growth, a lack of labour force, affordability issues, disruption of commuting patterns and the delivery of housing choice. [Further detail provided in the representatives full response.]	In order to meet its housing requirements, especially early in the plan period and ensure that the plan can be found sound at Examination it is crucial that the Council support deliverable housing sites and maximise potential housing capacity.	Yes
139/02/CS/LC/US1-4	Paul Tunstall	NWFC Planning on behalf of THPG Sandeman Trust and M Capital Developments	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/1 US/2 US/3 US/4	The Plan details that there is not considered to be a sufficient supply of housing land to meet the OAN in full. Such an approach is not justified or consistent with national planning policy in the context of paragraph 159. As the Plan is proposed to extend beyond the assessed housing need period, simply extending the time to delivery of new housing serves no purpose but to reduce the number of houses delivered. As the Council are not even proposing to meet this artificially reduced need, this is a significant issue that calls into the question the soundness of the plan. To be effective, an examination of soundness requires the plan to be deliverable over its plan period.  Policy SP6 concerns the delivery of new homes and set out where development is proposed to provide 12,000 new homes, this includes allocations for large strategic sites and smaller sites. There are also a sub-total relating to additional supply - the location of these dwellings is not clearly set out in the Local Plan and the Neighbourhood Plan section (Policy SC1) makes no specific reference to the number of new homes to be provided for by Neighbourhood Plans, either in total or individually.  This approach makes the plan very unclear in terms of where this delivery will actually be and how it will be delivered, with no specific requirement to inform neighbourhood plans. The timetabling of Neighbourhood Plans are also not included in the Plan. At present SP6 simply creates uncertainty and delays in the delivery of housing. [Further detail provided in the representatives full response.]	There are several instances in the Plan that define reasons why the Local Plan must meet housing need, not least for economic and demographic reasons. Planning for economic standstill is not sufficient and conflicts with national guidance in the NPPF. There are clear economic and social benefits relating to increasing housing supply to address these issues. Failure to deliver on housing needs conflicts with the Strategic Objectives of the Local Plan and the Council's Corporate Plan.	Yes
190/01/SP6/LC/US3	Michael Mumford	Lancaster and Morecambe Liberal Democrats	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/3	We consider the housing requirements to be unreasonably high for the period 2011 - 2031, namely a figure of 13,000 and 14,000. We are please to note that this has somewhat reduced to 11,000. However, it is still envisaged to be a very substantial number of new student dwellings to be included and we question how far this is either desirable or achievable. The principle behind this is to free up existing family housing in the city which is occupied by students. We doubt that many of the houses currently occupied by students will become available on the open market.	No suggested amendments made.	
169/04/SP6/LC/US1-4	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/1 US/2 US/3 US/4	CEP have consistently supported the delivery of 13,500 new dwellings across Lancaster District as per the evidence base. However, the Publication DPD now only proposes 12,000 new dwellings. The justification for this revised approach are the unique 'constraints' in the district such as environmental designation and infrastructure deficiencies. CEP consider this approach to be unsound and not consistent with the NPPF or the Council's prepared evidence base. The overall contribution to be made by strategic sites over the plan period has appeared to be heaviest since the 2017 Draft Plan. In terms of effectiveness this leaves very little margin for error in terms of meeting housing needs and the risk of failure is high.  CEP consider that discrepancies should be clarified before adoption, in particular the length of the plan period in terms of housing delivery and the scale of housing which is expected to be delivered through the Garden Village. [Further detail provided in the representatives full response.]	CEP request that the DPD should acknowledge that part of the strategic sites, such as CEP's landholdings at Scotforth Road are capable of delivery in the short term in order to make an earlier contribution to meeting the district's housing need. In addition we would suggest that Policy SP6 is amended to clarify that any identified housing requirement is a minimum target.	Yes
169/27/SP6/LC/US1-4	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/1 US/2 US/3 US/4	In the context of the housing monitoring update, CEP reiterate their previous request that the DPD should acknowledge that at least parts of the strategic development sites in the Strategic Policies & Land Allocations DPD, such as CEP's land holdings off Scotforth Road, are capable of delivery in the short term in order to make an earlier contribution to meeting the district's housing needs.  Part of the new additional evidence, particularly the transport assessment work undertaken by WYG, reaffirms CEP's view that a sustainable extension to South Lancaster is deliverable in the short term and therefore should be subject to a site-specific allocation which can be delivered in the early stages of the Plan rather than being delayed by the wider Garden Village allocation. This would ensure the effectiveness and therefore the soundness of the plan.	That land at Scotforth Road, South Lancaster is capable of early delivery within the plan and that it should be given its own site -specific allocation within the Strategic Policies & Land Allocations DPD.	Yes
019/03/SP6/LC/US3-4	Tony McAteer	McAteer Associates Ltd	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/3 US/4	Eccleston Homes consider the Council's decision to seek a minimum of 522 dwellings per annum falls short of meeting the housing needs of the district. No proper justification is given to departing from the evidenced needs set out in October 2015.	Eccleston Homes consider the housing requirement set out in Policy SP6 should seek a minimum of 675 dwelling per annum reflecting the mid-point of the OAN. Eccleston Homes consider it unrealistic to expect some one-third of housing to come from just five sites and that additional smaller sites should be identified.	No
093/01/CS/LC/US1&3	Anthony Breakell	N/A	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/1 US/3	Chapter 9 of the Plan quite rightly recognises that Lancaster has an ageing population and this calls for appropriate housing provision. It is also the case that an considerable number of student live in family housing in the South of Lancaster. These factors lead to the need for particular housing in the future, relatively small homes close to local services for the elderly and purpose built student accommodation to free up the family homes in the City. The high costs associated with the Garden Village, the largest development in the plan, means that large properties will be built, not meeting the needs of the City's ageing population.	Review the housing development sites identified in the Local Plan and concentrate on those that have the best chance of delivering the type of housing the city needs in the future.	Yes
070/02/CS/LC/US2	Dr Lesley Bryan	N/A	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/2	The use of housing need figures calculated by Turley is questionable. A new formula for calculating housing need has been published by the Government which should form the basis for this local plan.  In December 2017 the Council agreed a figure of 522 as their housing need figure, there does not appear to be any concrete basis for this figure. Higher housing figures will result in unnecessary loss of Green Belt land.	The housing figures need to be recalculated using the OAN formula suggested by the Government in September 2017. This would result in a lower and more realistic housing need figure.	No
168/01/CS/LC/US4	Tim Hamilton Cox	N/A	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/4	The Plan is not sound in its failure to deliver sustainable development as defined by the NPPF. The demographic basis of the OAN is very significantly flawed because the data used is outdated and because of the failure to appreciate or factor in unattributable population change. Furthermore the  Turley work on the OAN bases its estimates on OBR economic activity rates, these are different from those implicit in the forecasting model used by Experian. Had Experian used the OBR economic activity rates then it would have probably been lower. The estimates made by Turley of the homes needed to support jobs are therefore flawed.  The housing market indicators for Lancaster do not suggest that the housing market is under any particular stress. There is no case for a 'market signals uplift' to the housing need estimate. Whilst the OAN remains at 675 homes per year and the backlog is not addressed because the demand is simply not there for this level of house building, there is no safety from what might be deemed unplanned, unwanted and unsustainable development. [Further detail provided in the representatives full response.]	A corrected and updated analysis is therefore needed before there is a sound basis on which to set the housing requirement in the Local Plan.	Yes
128/03/SP6/LC/US1-4	Aqub Saghir	NIL Consulting on behalf of Persimmon Homes	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/1 US/2 US/3 US/4	The Council cannot demonstrate a 5 year supply of housing as required by the NPPF. It is necessary that the housing requirement in the Plan period gives consideration to addressing this. There is a shortfall in the number of homes provided. Policy SP6 can provide the opportunity to address this shortfall however in its current state the plan does not make provision for this. As a result the Council are in serious risk of failing to catch up with housing requirements. Considering the above the policy should make reference to existing shortfall accrued and how this will be addressed in the early years of the plan. We note that the Council has dismissed the staged approach originally advocated in the 2017 Draft Plan.  It is noted that there is a significant reduction in non strategic site delivery, the Council should be allocating more sites to meet the housing requirement and should provide allocations to boost these sources of supply. The current draft however has offset most of the above reductions via student accommodation and neighbourhood plan delivery expectations. This is not considered to be an appropriate approach.  Overall Policy SP6 fails to identify sufficient sites to address the identified housing requirement for Lancaster. This does not demonstrate that Lancaster are planning positively to meet anticipated growth. [Further detail provided in the representatives full response.]	The Council should take a more positive approach and aim to not only address the existing shortfall but allocate as much of the supply as possible.	No
128/18/SP6/LC/US1-4	Claire Norris	Persimmon Homes	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/1 US/2 US/3 US/4	With regard to housing requirement and supply, the City Council cannot demonstrate a 5 year housing supply and must ensure that their Local Plan identifies opportunities through site allocations to boost the supply of housing. Policy SP6 does not acknowledge or address the shortfall accrued so far within the district. In addition the allocations currently identified do not meet the housing needs of the area. The housing need requirement considered appropriate by the Council is significantly below the OAN figure and not a true reflection of the requirements within Lancaster. The Plan promotes economic growth but has substantially reduced the housing requirements. This approach is considered counter intuitive.  The plan must make provision for more allocations to meet the housing needs of the area and identify more sites and release land from the Green Belt to achieve this. [Further detail provided in the representatives full response.]	Further land should be allocated to meet evidenced housing needs in the district, in particular the land South of Pinewood Avenue which should be released from the Green Belt.	Yes
124/03/SP6/LC/US1-4	Michael Gilbert	Peter Brett Associated on behalf of Hurstwood Holdings	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/1 US/2 US/3 US/4	We are concerned that the Council is backing away from delivering the objectively assessed need for housing which is 675 dwellings per annum. We would prefer to see the Council revert back to its original intention to deliver this need in full and look at how delivery can be increased from identified sites to meet this target, as well as possibly allocate additional land.  Notwithstanding this, we fully support and endorse the clear acknowledgement by the Council that the Lune Industrial Estate is capable of accommodating housing development and welcome its inclusion as part of the anticipated housing supply.	The Council should seek to meet its objectively assessed housing need in full.	Yes
124/10/SP6/LC/US1-4	Michael Gilbert	Peter Brett Associated on behalf of Hurstwood Holdings	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/1 US/2 US/3 US/4	The latest five year housing land supply position statement concludes that the Council is able to demonstrate a 13.3 year supply of deliverable housing land. However, this figure is based on a flawed assessment which utilises the now discredited 2016-based household projections for estimated housing needs under the current 'standard method' which is currently under review by the Government.  The dramatic drop in using this approach is not a sound basis on which to calculate housing need or address housing supply. [Further detail provided in the representatives full response.]	We consider that the latest 5 year housing supply statement should be withdrawn and amended to reflect the 2014-based household projections. We would expect the effect to be that the five year supply reduces to a level that is similar to that reported in October 2017 which we consider to be far more robust and realistic.	Yes
151/07/SP6/LC/US1	Lydia Harper	PWA Planning on behalf of Hollins Strategic Land	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/1	As part of Policy SP6, the Council set out that 495 of the 700 dwellings allocated can be built out through the plan period. It is our clients view that SP6 should, be amended to detail that the anticipated number of dwellings in the plan period should be 700 and not 495. A number of housebuilders can be on the site at the same time. This will strengthen the assumed delivery of units as detailed in the housing trajectory.  It is considered that the Council must plan for greater flexibility in the wording of Policy S69 and EN7 to enable the best use of the site whilst ensuring satisfactory design. [Further detail provided in the representatives full response.]	Amendments should be made to Policies S69 and EN7 to provide greater flexibility and the assumed delivery rates for the site set out in Policy SP6 should be increased.	Yes
103/02/SP6/LC/US1	Daniel Hughes	PWA Planning on behalf of Oakmere Homes	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/1	It is noticeable that Policy SP6 establishes a lower target than the evidenced OAN of either 2015 or 2018. This reduction appears to be on reflection of local transport infrastructure constraints. Without the delivery of necessary infrastructure it cannot be demonstrated that the growth to the scale proposed is acceptable in planning terms. Similarly, this infrastructure will not come forward immediately. It is the conclusion of our client that further sites should be identified within the Local Plan to ensure that the targets of Policy SP6 can be provided for. [Further detail provided in the representation full response.]	Further sites should be identified for housing growth within Policy SP6.	Yes

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Inter) ATTENDING EXAMINATION
098/01/SP6/LC/US1-4	San Griffiths	RCA Regeneration on behalf of GB.R Escombe	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/1 US/2 US/3 US/4	We have concerns over the Plan's reliance on the large proportion of housing numbers which will be delivered through strategic sites which are associated with longer set-up / lead-in times and often offer new associated infrastructure. Given the Council's historical delivery and completion rates, the over reliance on a number strategic sites may subvert future housing completions.  Policy SP6 includes a total of 1,385 dwelling which are expected to be delivered from additional supply including neighbourhood plans. This additional supply also includes windfall opportunities. It is our clients view that the emerging plan is overly reliant on windfall sites and should reduce this allowance and increase additional housing sites to align with the plan-led system identified as part of the Core Principles in the NPPF. [Further detail provided in the representatives full response.]	Further sites should be identified for housing and a reduction made to the assumptions for windfall sites to come forward through the plan period.	Yes
029/02/CS/LC/US1&4	Adam Key	Savills on behalf of the Bairrigg Farmland Trustees	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/1 US/4	We object to the additional 3 years beyond the plan period. The plan period is the plan period and it is not sound to need an additional 3 years to deliver the housing OAN. We note that the annual requirement has been reduced to 522 dwellings per annum (down from the 675 per annum figure identified in the draft Plan) and we are concerned that this figure is not sufficiently ambitious. [Further detail on this matter is contained in the full response.]	The Plan should seek to meet a more ambitious OAN within the plan period, not seek extensions to the delivery period. The plan should clearly distinguish the levels of growth which can be achieved in the short term within the requirement for significant infrastructure upgrades.	Yes
162/01/SP6/LC/US1-4	Graham Love	Smith & Love Planning on behalf of Applethwaite Homes	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/1 US/2 US/3 US/4	It is clear that insufficient housing has been identified to meet either the original or verified OAN in full. The scale of under delivery is significant and the Local Plan must boost housing supply by allocating a greater number of sites for housing, including a wider range of smaller sites. This must not exclude the allocation of suitable sites in neighbourhood plan areas.  The Plan also remains reliant on a number of large strategic greenfield sites that require a lead-in time and carry uncertain risk. Additional supply is therefore required in the early years of the plan period. Additional supply can be provided by allocating more sites in urban and rural locations via Policy H1 and H2. We consider that a more ambitious figure should be set for supply within neighbourhood plan areas as they have a clear potential to deliver a greater number of dwellings.  In addition to being quantitatively deficient, we consider the planned housing supply to be qualitatively deficient in terms of the limited range and geographical distribution of housing allocations and development opportunities. The planned provision in Policy SP6 does not adequately boost delivery for specific sectors of the community such as retirement housing. [Further detail provided in the representatives full response.]	A higher total number of dwellings should be included under the title 'non strategic site delivery' if, as we suggest, that our clients land at Chapel Lane Galgate is including in the Plan (as a rural housing site) and also its land at Sea View Drive, Slyneth-with-Hest (in the event that the Slyneth-with-Hest neighbourhood plan does not progress in a timely manner).  A higher total number of dwellings should be also included in the box labelled 'Additional supply including neighbourhood plan delivery expectations' in Policy SP6.	
108/03/SP6/LC/US1-4	Graham Love	Smith & Love Planning on behalf of G & M Parker	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/1 US/2 US/3 US/4	We consider that a more ambitious figure should be set for the expected supply within the Neighbourhood Plan areas as these have a clear potential to deliver a greater number of dwellings. In particular Morecambe and the five sustainable settlements of Halson, Slyneth-with-Hest, Caton, Cockham and Wray notwithstanding locationally specific constraints. The City Council have not undertaken an apportioning exercise and the expected contribution from Neighbourhood Plan areas is based on the anticipated results of the 2018 SHELAA. [Further detail provided in the representatives full response.]	The City Council should set proportionate individual housing requirements for each of the designated Neighbourhood Areas that are derived from the objectively assessed housing need for Lancaster, in relation to the settlement hierarchy in terms of population, size and access to services and facilities. A correspondingly higher number should be included in Policy SP6.	Yes
107/03/SP6/LC/US1-4	Graham Love	Smith & Love Planning on behalf of J & S Lamb	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/1 US/2 US/3 US/4	The Local Plan is not positively prepared and it must boost the planned supply by allocating a greater number of sites for housing, including a wider range of smaller and medium sized sites in a variety of locations and especially ones which can be delivered early in the plan period without the need for significant infrastructure.	An increased total number of dwellings should be included in the box labelled 'Additional supply including neighbourhood plan delivery expectations' in Policy SP6 table (if our clients land remains as identified as a SHELAA site in the planned housing supply) or in the box labelled 'Non-Strategic Site Delivery' if, as requested in our representations, our clients land is included in the Local Plan as a rural housing allocation site.	Yes
135/01/SP6/LC/US1-4	Graham Love	Smith & Love Planning on behalf of Oakmere Homes	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/1 US/2 US/3 US/4	It is clear that insufficient housing land has been identified to meet the OAN. The scale of the under delivery is such that the Local Plan must boost supply by allocating a greater number of sites for housing. This must not also not exclude the allocation of sites in neighbourhood plan areas. The local plan is also reliant on a number of large greenfield sites that require significant infrastructure which carry uncertainties and risk. Additional supply is therefore needed in the early phase of the plan which can be brought through quickly.  The Council, via its background papers consider that all reasonable alternatives to meet its OAN have been considered, this must be revised and consider the opportunities it has discounted, such as land to the east of Fulwood Drive. We therefore consider that a more ambitious figure should be set for the expected supply within neighbourhood plan areas as these areas have the potential to deliver a greater number of dwellings.  In addition to being quantitatively deficient, we believe the supply is qualitatively deficient and limited in terms of range and geographical distribution. This is especially noticeable in Morecambe and the Council acknowledge that opportunities are limited. Strategic development is focused around Lancaster with no strategic growth planned in Morecambe.	In order to ensure that neighbourhood plans are positively prepared, the Council should set proportionate individual requirements for each designated area and the expectations should be boosted to those which are currently identified in Policy SP6.  Additionally, in the event that Slyneth-with-Hest and/or Morecambe Neighbourhood Plans are not sufficiently progressed then the City Council should seek to allocate land to the east of Fulwood Drive for residential purposes under Policy H1 for 140 dwellings.	Yes
135/06/SP6/LC/US1-4	Graham Love	Smith & Love Planning on behalf of Oakmere Homes	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	US/1 US/2 US/3 US/4	Oakmere homes consider that the housing requirements for neighbourhood plan areas should be set by Policy SP6 of the Local Plan. Oakmere Homes responded to suggested modifications which proposed indicative figures for neighbourhood plan area, considering them to be fundamentally unsound and unjustified.  To ensure a sound policy Oakmere Homes believe that reasonable requirements for neighbourhood plan areas must be included in Policy SP6. [Further detail provided in the representatives full response.]	Oakmere Homes that the following modifications are needed, by adding a table and footnotes to Policy SP6 to provide sound housing requirement figures for the Morecambe Neighbourhood Plan and Slyneth-with-Hest Neighbourhood Plan areas. Oakmere Homes believe these to be a minimum of 140 dwellings for Morecambe and Slyneth-with-Hest 180 dwellings.	Yes
100/16/SP6/LC/5	David Barnes	Star Planning on behalf of Seemore Properties Ltd	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	S	Seemore Properties support the identification of the East Lancaster Strategic Site under Policy SP6. Seemore Properties note that some 900 dwellings are anticipated to be delivered through the plan period, the final capacity will inevitably be determined via a masterplanning exercise undertaken during the preparation of a planning application.	No suggested amendments made.	Yes
049/02/SP6/9.18/LC/US1&3&4	Chris Middlebrook	Steven Abbott Associates	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	9.18	LC	US/1 US/3 US/4	There is a significant reliance on larger strategic sites to meet housing need and it is necessary for smaller sites to be allocated within the plan so they can quickly and effectively contribute to meeting 5 year housing supply. Specific reference is made to the contribution of developing land at Bowerham Lane. It is considered that the identification of small scale sites is supported by the emerging NPPF.	There is an over reliance on large strategic sites, therefore support should be given to the allocation of smaller sites such as land at Bowerham Lane.	Yes
081/01/CS/LC/5	Melanie Lindsay	The Coal Authority	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	LC	S	The Coal Authority is pleased to see that the specific policies for the development areas confirm that all relevant policies within the local development plan will need to be taken into account.	No suggested amendment made.	No
163/07/SP6/NLCS/US1-4	David Diggle	Turley on behalf of Peel Holdings Investments	Strategic Policies & Land Allocations DPD	Chapter 09	SP 06	N/A	NLC/5	US/1 US/2 US/3 US/4	The housing requirement provided in Policy SP6 is 100 dwellings short of the OAN for the district, however it is also stretched across a longer delivery period. The effect is that the Plan proposes annual delivery of 522 dwellings per annum which is 14% that the identified annual need for a minimum of 605 dwellings. It appears that if the Council continue with the housing target and timeframe proposals the fully evidenced housing needs of the district will not be met. The strategy for meeting housing needs is therefore not justified and does not meet the soundness tests of paragraph 182.  Policy SP6 identifies the opportunities for housing delivery within the district and allocates land potentially capable of delivering 12,056 dwellings over the period 2011 - 2034, this is just enough to meet the 12,000 target but provides no flexibility to ensure that housing needs are met if sites stall or windfalls don't come forward. Consequently, the Council appears dependent on the delivery of all the sites identified within the plan by 2034 if it is to meet the needs of the district. There is a significant risk that the plan will be ineffective in meeting housing needs.  Peel support the inclusion of a mechanism for early review of the Plan and agrees this should be enshrined in policy. However, it is important not to plan to fail and the review mechanism should be treated as a last resort and only enacted if all other efforts to secure delivery have failed. The requirement for early review should not refer to Bailrigg Garden Village specifically as effective delivery of the Plan is dependent on all the allocated sites. Policy SP6 is a suitable location for the early review mechanism. [Further detail provided in the representatives full response.]	Peel respectfully recommend that the Council adopt a minimum of 605 dwellings per annum as per the evidenced needs and extend the overall plan period to 2034. This would equate to a minimum new housing requirement of 13,195 dwellings to be delivered by 2034.  In addition to identifying land to meet the minimum housing requirements, the Council should provide 'flexibility to adapt to rapid change' in accordance with paragraph 14 of the NPPF. In this context Peel suggest that the Council identify additional land to deliver a further 15% of the housing requirement. This would equate to a need to identify land for the delivery of 695 dwellings per annum. The provision of additional sites and safeguarded land would provide the Council with flexibility and greater certainty that housing needs will be met in the event that delivery is delayed on some sites.	Yes
163/07/SP6/NLCS/US1-5	David Diggle	Turley on behalf of Peel Holdings Investments	Strategic Policies & Land Allocations DPD	Chapter 10	SP 07	N/A	NLC/6	US/1 US/2 US/3 US/5	The housing requirement provided in Policy SP6 is 100 dwellings short of the OAN for the district, however it is also stretched across a longer delivery period. The effect is that the Plan proposes annual delivery of 522 dwellings per annum which is 14% that the identified annual need for a minimum of 605 dwellings. It appears that if the Council continue with the housing target and timeframe proposals the fully evidenced housing needs of the district will not be met. The strategy for meeting housing needs is therefore not justified and does not meet the soundness tests of paragraph 182.  Policy SP6 identifies the opportunities for housing delivery within the district and allocates land potentially capable of delivering 12,056 dwellings over the period 2011 - 2034, this is just enough to meet the 12,000 target but provides no flexibility to ensure that housing needs are met if sites stall or windfalls don't come forward. Consequently, the Council appears dependent on the delivery of all the sites identified within the plan by 2034 if it is to meet the needs of the district. There is a significant risk that the plan will be ineffective in meeting housing needs.  Peel support the inclusion of a mechanism for early review of the Plan and agrees this should be enshrined in policy. However, it is important not to plan to fail and the review mechanism should be treated as a last resort and only enacted if all other efforts to secure delivery have failed. The requirement for early review should not refer to Bailrigg Garden Village specifically as effective delivery of the Plan is dependent on all the allocated sites. Policy SP6 is a suitable location for the early review mechanism. [Further detail provided in the representatives full response.]	Peel respectfully recommend that the Council adopt a minimum of 605 dwellings per annum as per the evidenced needs and extend the overall plan period to 2034. This would equate to a minimum new housing requirement of 13,195 dwellings to be delivered by 2034.  In addition to identifying land to meet the minimum housing requirements, the Council should provide 'flexibility to adapt to rapid change' in accordance with paragraph 14 of the NPPF. In this context Peel suggest that the Council identify additional land to deliver a further 15% of the housing requirement. This would equate to a need to identify land for the delivery of 695 dwellings per annum. The provision of additional sites and safeguarded land would provide the Council with flexibility and greater certainty that housing needs will be met in the event that delivery is delayed on some sites.	Yes
169/29/SP6&SG1/LC/US1	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Strategic Policies & Land Allocations DPD	Chapter 09 Chapter 12	SP 06 SG 01	N/A	LC	US/1	Whilst referred to, the 2018 SHELAA fails to draw any conclusions over the deliverability of land off Scotforth Road or assign any development potential to these sites. In this context CEP would state that the SHELAA assessment is carried out and reflects the commentary provided in the representatives full response. [Further detail provided in the representatives full response.]	CEP request that the SHELAA is updated to better reflect the deliverability of their site within the first five years of the plan period and mark the site as 'green'.	Yes
147/03/SP6&H2/LC/US2&4	Alice Weston	Knights Professional Services	Strategic Policies & Land Allocations DPD	Chapter 09 Chapter 20	SP 06 H 02	N/A	LC	US/2 US/4	Our client considers the plan to be unsound in respect of Policy SP6 as a result of the omission of land at Low Road which we consider should be included as a housing land allocation. The site is located on the northern edge of Halson and has, in part, planning permission for 60 dwellings. The site is well contained and provides opportunity to allow for further development to the east.  Whilst it is acknowledged that the site falls in part into the Forest of Bowland AONB it should have weight in the planning balance and does not preclude development taking place. [Further detail provided in the representatives full response.]	Land to the South of Low Road, Halson should be identified under Policies SP6 and H2 for housing.	Yes
147/04/SP6&H2/LC/US2&4	Matthew Wedderburn	Knights Professional Services	Strategic Policies & Land Allocations DPD	Chapter 09 Chapter 20	SP 06 H 02	N/A	LC	US/2 US/4	As stated in our original representations, our client considers the Plan to be unsound in respect of Policy SP6 as a result of the omission of land south of Low Road Halson. Our client have studied the findings of the SHELAA and believe that ongoing pre-application work for this site will address any outstanding concerns in relation to developing the site.  Given the land south of Low Road should be considered a suitable location for development yet is omitted from Policy SP6, we consider the plan not to be justified and not consistent with national planning policy. [Further detail provided in the representatives full response.]	Land to the South of Low Road, Halson should be identified under Policies SP6 and H2 for housing.	Yes
106/15/SP7/LC/US2-3	Craig Barnes	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 10	SP 07	N/A	LC	US/2 US/3	Whilst our client supports the aims in this policy our client is concerned that the proposed wording requiring a response from developers in relation to maintaining the district character is disproportionate. The requirement to contribute to this is considered too significant a scale against which to require development proposals to respond. Its implementation may result in development that is out of context to its local surroundings due to the need to respond to the character on a larger geographic scale.	The policy should be re-directed to focus on local character and qualities which help shape the diversity of the wider district.	Yes
050/06/SP7/LC/US1&4	Emily Hrycan	Historic England	Strategic Policies & Land Allocations DPD	Chapter 10	SP 07	N/A	LC	US/1 US/4	Concern is raised about the degree to which the current policy provides an appropriate framework for the district's heritage assets in line with the NPPF. We consider the lack of locally specific detail is a significant omission. The policy as drafted is very broad and does not provide a framework for conservation and management of the district's heritage assets. The policy should be amended to include spatially setting out the elements of the historic environment which contribute to the district. [Further detail provided in the representatives full response.]	Historic England have proposed significant amendments to Policy SP7 in order to make the Policy sound. This can be read in full via their full response.	
117/02/C10/LC/US2-4	Gina Dowding	N/A	Strategic Policies & Land Allocations DPD	Chapter 10	SP 07 SP 08	N/A	LC	US/2 US/3 US/4	The plan refers to Climate Change and seeks to address this in part through renewable energy. However the plan does not stipulate that low carbon energy infrastructure and provision is necessary to new development. Given the urgency and the NPPF commitment to a transition to a low carbon future, the lack of substantial action and requirement for low carbon energy and community energy make the document unsound.	Include requirements on new development for low carbon energy provision.	Yes
073/02/C10/LC/US2-3	Mary Breakell	N/A	Strategic Policies & Land Allocations DPD	Chapter 10	SP 07 SP 08	N/A	LC	US/2 US/3	The Local Plan (paragraph 10.11) recognises that flooding is a significant issue for Galgate. However the development of 3,500 new homes at the proposed Bailrigg Garden Village will bring increased risks. What are the implications from the Innovation Campus and reconfigured junction 33 for Galgate?	It is not possible to have an informed view on the Garden Village because so little information has been provided. Given this represents such a large element of the Local Plan I believe it should be withdrawn until full evidence of costs and implications are available. I would like to see an updated Flood Risk Assessment not just for the proposed Garden Village but one which reassesses Galgate flood risk and models the impacts of both road changes and proposed new development.	No
095/02/C10/LC/US3-4	Ralph Prior	N/A	Strategic Policies & Land Allocations DPD	Chapter 10	SP 07 SP 08	N/A	LC	US/3 US/4	Galgate floods regularly from the run-off from the University which runs into the River Conder, Ou Beck and Burrow Beck. The motorway run-off flows into Whitley Beck which also flows through Galgate. The Plan accepts flood is a challenge but does not explain how it will be resolved or funded. I am concerned that the new development associated with the Bailrigg Garden Village will exacerbate flood risk in Galgate.	I feel that the flood risk assessment for Galgate should be revised in light of the November 2017 floods and some modelling done to assess the risks arising from Bailrigg Garden Village, Health Innovation Campus and reconfiguration of Junction 33.	No
091/01/C10/LC/US1-4	Stephen Constantine	N/A	Strategic Policies & Land Allocations DPD	Chapter 10	SP 07 SP 08	N/A	LC	US/1 US/2 US/3 US/4	This is a personal submission on the Plan and is separate to those which have been submitted by CLOUD.  Given the lack of information published it is very difficult to deduce how the construction of the Garden Village and Agri-Business Centre will have on impact areas of landscape, or indeed what measures will be taken, when developed, to fulfill the obligations set out in national policy.  The Lancaster Canal is a great asset and is immensely popular. But we are yet to understand how close the canal bank will be to the new development in the Garden Village. Nor do we know the impact of any proposed crossing of the canal will be. One fears that it would be obtrusive and out-of-keeping with the character of the area. There is also concern over the impacts from the Agri-Business Centre will have on the character of the canal which could be seriously intrusive. Perpetual invisibility to obscure an eye-sore will require rigorous planting and maintenance - can this be achieved?  There is concern that nowhere in the Plan is there reference to the roman remains at Burrow Heights in terms of its location, security or how its importance as a scheduled monument will be enhanced.  With respect to the Garden Village, the plans provided to the public have been described as once in a lifetime and the relocation of the Agri-Business Centre as a solution to its existing 'highly constrained' location. But proposed developments and solutions have implications for more than our lifetimes. Get this wrong and lifetimes in the future will lament the irreversible damage to Lancaster local environment, its ecology, its amenities and its historic inheritance. [Further detail provided in the representatives full response.]	The matter to which I refer could only be rendered sound if they complied precisely to what is required by NPPF and NPPG. A revised plan would need to be put to the public as well as the Planning Inspector to demonstrate what revisions have been made. Moreover, close and sustained monitoring would thereafter be required to reassure members of the public that what had been promised on paper was actually secured.	No
126/03/C10/LC/US3-4	Val Purnell	N/A	Strategic Policies & Land Allocations DPD	Chapter 10	SP 07 SP 08	N/A	LC	US/3 US/4	Concreting over the countryside and grubbing out hedgerows and trees destroys wildlife which would take years to return, if ever.	There is insufficient reassurance of protection of wildlife in the Local Plan as a consequence of building so many house and road on greenfield land. Use brownfield land to avoid this.	No
093/02/SP8/LC/US1-3	Anthony Breakell	N/A	Strategic Policies & Land Allocations DPD	Chapter 10	SP 08	N/A	LC	US/1 US/2 US/3	Policy SP8 states that the Plan has been prepared in consultation with the relevant authorities, such as the Environment Agency. However, in light of the flooding events of November 2017 that the EA flood boundaries require urgent review. Flood risk zones need to be reviewed to reflect the impacts of Climate Change over recent years. It would be unwise to identify new areas of housing until this review has been carried out. The Plan should also contain specific measures to prevent or at least reduce flood risk to existing homes.	A comprehensive review of flood risk across Lancaster and the identification of flood prevention measures.	Yes

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Insert) ATTENDING EXAMINATION
010/01/SP8/LC/US4	David Dunlop	Wildlife Trust for Lancashire, Manchester & North Merseyside	Strategic Policies & Land Allocations DPD	Chapter 10	SP 08	N/A	LC	US/4	The policy as currently written is too narrow to comply with national planning policy as it only relates to areas of recognised national and international importance and omits those of local importance and it requires those areas to be simultaneously of national AND international importance. The NPPF requires local authorities to set criteria based policies for designated sites that make distinctions between hierarchy of sites. The NPPF goes on to state through paragraphs 113 and 117 that protection should be commensurate with their status and gives appropriate weight to their importance and contribution they make to the wider ecological network and that planning policies should identify and map components of the local ecological network.	We recommend that the policy be amended to read 'seek to protect areas of land functionally linked ecologically to areas that are of international and/or national and/or local importance.'	Yes
054/03/SP9/LC/US3	Chris Garner	Garner Planning on behalf of Russell Armer Ltd	Strategic Policies & Land Allocations DPD	Chapter 11	SP 09	N/A	LC	US/3	The policy requires 'that the aspirations of all sections of the community are met'. This is impossible to achieve because not all members of any community have the same aspirations. As worded it does mean that for those that do not want their settlement to accommodate further housing growth then this policy requirement will not be met.	Delete the sentence 'through making sure that the aspirations of all sections of the community are met.'	Yes
169/07/SP9/LC/5	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Strategic Policies & Land Allocations DPD	Chapter 11	SP 09	N/A	LC	5	CEP broadly support and consider sound the Council's commitment to ensuring the long term sustainability of the district communities. Notwithstanding this, it is important that an evidence based approach is adopted in relation to education and health provision, particularly in relation to Bailrigg Garden Village.	No suggested amendments made.	Yes
163/08/SP9/LC/5	David Diggle	Turley on behalf of Peel Holdings Investments	Strategic Policies & Land Allocations DPD	Chapter 11	SP 09	N/A	LC	5	Peel support the aim of Policy SP9 to provide appropriate provision for education and health within the district. However, this work should be undertaken strategically within the plan making process in order for sites within the most suitable and viable locations to be identified and allocated accordingly.	No suggested amendments made	Yes
164/01/C11/LC/5	Andrew Gate	Community Health Partnership - Morecambe Bay CCG	Strategic Policies & Land Allocations DPD	Chapter 11	SP 09 SP 10	N/A	LC	5	The Plan does not sufficiently reference cooperation with the NHS, in particular Morecambe Bay CCG in providing healthcare infrastructure for the residents of the Council area. The CCG has a duty to provide primary health care to the general population, development within the plan will inevitably put a strain on the existing health infrastructure.	The CCG requires the plan to take account of this need to provide adequate healthcare to the population and for Section 11 of the Plan to make explicit reference to protecting existing healthcare infrastructure and delivering new in response to new development. Detailed wording is suggested within the representer full response.	No
106/16/SP10/LC/US2-4	Craig Barnes	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 11	SP 10	N/A	LC	US/2 US/3 US/4	Our client is supportive of the aims of the Council which seek to reduce reliance on car usage by requiring new development to be sustainably located. Our client is however concerned by the proposed policy requirement to contribute to the delivery of 'important transport infrastructure' where appropriate and necessary to do so. This approach introduces uncertainty for applications as to what the requirements of the Council will be for certain developments. Such contributions may challenge viability of development and their financial capacity to meet other requirements of the Local Plan.  It is noted that whilst the Council have published a Infrastructure Delivery Schedule which provides an indication of costs and timescales this has not been tested through a viability assessment. As a result it is not clear what impact infrastructure requirements will have on the deliverability of sites.	In the implementation of this Policy, the Council must ensure that obligation tests outlined in paragraph 204 of the NPPF are adhered to. The Council also need to ensure that the Community Infrastructure Levy are followed ensuring that contributions for the same project are not sought from more than five different projections (pooling) and that that infrastructure requirements are not made in relation to development types which are exempted under CIL regulations.  It is critical that the Viability Assessment to support the Local Plan is published as soon as possible, the copuncil should allow time for review and comment on this assessment.	Yes
148/07/SP10/LC/5	Jon Power	CBRE on behalf of Lancaster University	Strategic Policies & Land Allocations DPD	Chapter 11	SP 10	N/A	LC	5	The University is supportive of the aspirations of the Council to promote new development in sustainable locations and accessible from a range of transport modes.	No suggested amendment made.	Yes
080/01/SP10/NLC/US1-4	Janet Taylor	Friends of Denny Beck	Strategic Policies & Land Allocations DPD	Chapter 11	SP 10	N/A	NLC/5	US/1 US/2 US/3 US/4	Making junction 34 the principle gateway means that traffic to the south of Lancaster will have to go round the gyratory system. This will mean further traffic jams and makes the 10% relief from the HDV Movement Strategy redundant.	There should be a balance directing traffic north and south depending where traffic is going in Lancaster.	Yes
054/04/SP10/LC/US2-3	Chris Garner	Garner Planning on behalf of Russell Armer Ltd	Strategic Policies & Land Allocations DPD	Chapter 11	SP 10	N/A	LC	US/2 US/3	The policy should be to deliver transport infrastructure and not defer to a separate Highways and Transport Masterplan published by the highway authority. It is not necessary to have a policy that requires development to be located in sustainable locations that ensure a range of transport options when Policy SP2 identifies the sustainable locations for growth.	Delete the policy and replace with a policy that indicates support for the delivery of transport infrastructure.	Yes
169/08/SP10/LC/US3	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Strategic Policies & Land Allocations DPD	Chapter 11	SP 10	N/A	LC	US/3	CEP are eager to engage in the Garden Village masterplanning in order to provide greater clarity regarding phasing of development and the delivery mechanisms for infrastructure. Notwithstanding this, CEP's Scottish Roads site benefits from excellent accessibility to both the existing and proposed residential communities in South Lancaster. Given the site is so well contained it could be delivered ahead of the provision of the bulk of infrastructure required. Careful consideration should be given to development viability when considering infrastructure requirements.	We would recommend that further consideration is given to both the viability to delivering various infrastructure associated with the Garden Village and the appropriate mechanism for it delivery prior to adoption. Policy SP10 should be revised accordingly.	Yes
110/03/SP10/LC/US2	Nick Moule	N/A	Strategic Policies & Land Allocations DPD	Chapter 11	SP 10	N/A	LC	US/2	Greater precision is needed in the plan over future transport planning and management should be explained. Proposals for more housing and economic schemes will invariably add to an overloaded traffic network. Some reference is made to the forward planning of transport networks, but it is difficult to see from the breadth of infrastructure projects described how the existing or new transport schemes will accommodate increased demand.	No suggested amendments made.	No
100/17/SP10/LC/US1	David Barnes	Star Planning on behalf of Seemore Properties Ltd	Strategic Policies & Land Allocations DPD	Chapter 11	SP 10	N/A	LC	US/1	The principle of reducing reliance on car usage by requiring new development to be sustainably located is supported. However, this policy requires development to contribute to the delivery of important transport infrastructure where it is necessary and important to do so.  As drafted there is ambiguity and a lack of certainty about what requirements will be attached to certain developments. Such contributions could affect development viability and the delivery of affordable housing. A blanket statement about paying for transport infrastructure has not been tested and any contributions must meet the statutory tests concerning such payments.	Greater clarity about the requirements will be attached to certain developments.	Yes
161/09/SP10/LC/5	David Diggle	Turley on behalf of Peel Holdings Investments	Strategic Policies & Land Allocations DPD	Chapter 11	SP 10	N/A	LC	5	Peel broadly support the Plan's aspirations in respect of highway infrastructure and delivery. However, whilst it is appropriate and necessary for new development to help facilitate infrastructure provision where there is clear evidence it is required the Council will appreciate it is neither viable nor appropriate for the development industry to be solely responsible for infrastructure funding which is needed to address existing problems or provide benefits beyond the development itself. This is particularly the case in relation to road infrastructure.  Development should not be delivered where it could come forward by utilising existing infrastructure and capacity. Detailed consideration needs to be given to maintaining delivery ahead of the whole package of infrastructure requirements identified.	No suggested amendments made	Yes
020/03/C11&C24/NA	Marcus Hudson	Lancashire County Council (Highways and Transport)	Strategic Policies & Land Allocations DPD	Chapter 11 Chapter 24	SP 10 T 01 T 02 T 03 T 04	N/A	N/A	N/A	Support given to policies T1, T2, T3 and T4 of the Strategic Policies and Land Allocations DPD which seek to build on the Lancaster District Highways and Transport Masterplan and emerging Movement Strategy. Further suggested references are recommended for Policy T3 and T4.  With regard to the preparation of the transport assessment to support the Local Plan, the basic assessment is considered a proportionate approach to local plan delivery and supporting evidence base. This is acceptable subject to completion of the strategic modelling work and subsequent updates to the basic approach current adopted demonstrating that the mitigation measures proposed in tandem with the strategic infrastructure requirements can support delivery of the full Local Plan. Further information and detail on the assessment can be read in the representatives full representation.  With regards to strategic modelling work. Due to the significant costs involved in developing such models, the County Council would not ordinarily expect a transport model to accompany a local plan making exercise, and where such a model would be used solely for local plan assessment purposes, the cost to be borne as part of the plan-making exercise by the local planning authority. [Further detail provided in the representatives full response.]	Suggested wording is suggested for Policies T3 and T4 in relation to the Local Cycling and Walking Infrastructure Plan and Movement Strategy.	
181/02/C12/LC/US1-4	Dave and Laura Lamont	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	N/A	N/A	LC	US/1 US/2 US/3 US/4	Objection raised to Bailrigg Garden Village, our main concern is traffic to the South of Lancaster - all routes effectively come together at Pointer Roundabout with traffic bottlenecked through the City Centre gyratory. Air quality is another point to consider, walking along Scotforth Road is already a very unpleasant experience due to the high levels of traffic and congestion. I fail to see the reasons (other than financial reasons) for wanting to blight the South of the City. If homes are really thought to be necessary, which I doubt, then surely there must be better places where development could take place in smaller batches so to dilute their impact.	No suggested amendments made.	No
106/17/SG1/LC/US2-3	Craig Barnes	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01	N/A	LC	US/2 US/3	Our client is supportive of the allocation of Bailrigg Garden Village and welcomes the Council's recognition that not all the 3,500 dwellings are deliverable in the plan period. Given the current uncertainties about how the site will come forward our client questions how realistic the 1,655 dwelling assumption made by the Council is. The effects of these uncertainties is likely to push back delivery.  Our client also questions the delivery rate assumed for the Garden Village which at its peak is assumed to be 120 dwellings per year. To achieve such a peak 4 to 5 different developers would be required to develop the site, however it is unclear at this stage whether this would be achieved. Our client considers that the Council should make a less ambitious assumption about the rate of delivery which might be achieved on site. It is our clients view that the peak delivery rate should be dropped to 120 dwellings per year. [Further detail provided in the representatives full response.]	The Council should reconsider the levels of housing which can be delivered through this plan period.  It is our clients view that the peak delivery rate should be dropped to 120 dwellings per year.	Yes
106/43/SG1/LC/US1-4	Ian Gilbert	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01	N/A	LC	US/1 US/2 US/3 US/4	We consider the approach taken to the preparation of the SHELAA to be a disjointed approach to drafting the plan. The Local Plan requires robust evidence and the Council has seemingly omitted information from one of its crucial evidence base documents in lieu of a future evidence base document coming forward.  The client support the conclusions of the SHELAA in relation to site references 321 at Grab Lane, Lancaster. We also note inconsistencies between the SFRA and the SHELAA in relation site 148 and flood risk matters - land west of Highland Brow. The SHELAA suggests that this land is located in Flood Zone 3, this suggestion is not correct and should be considered available for development.	The SHELAA should be added to address the inconsistencies identified.	Yes
122/01/SG1/LC/5	Tim Bettany - Simons	Canal and River Trust	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01	N/A	LC	5	Although not a matter to make the policy unsound, as drafted it is unfortunate that the key principles of the Garden Village do not make reference to the Canal Corridor, which forms the western boundary to the proposed allocation.	Detailed wording is suggested within the representatives full response.	No
127/03/SG1/LC/5	Alban Cassidy	Cassidy & Ashton on behalf of Mrs S Thagia	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01	N/A	LC	5	It is considered that the inclusion of the three sites identified in this submission on land at Preston / Lancaster Road is appropriate. Given the sustainability of this location they should continue to be included within the boundary for the Garden Village utilising their good access to the A6.	No suggested amendments made.	Yes
164/02/C12/12.2&12.5&12.6/LC/US3	Andrew Gate	Community Health Partnership - Morecambe Bay CCG	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01	12.2 12.5 12.6	LC	US/3	The Garden Village proposals will potentially create the largest increase in local population in the plan, residents will require access to healthcare. There is currently no GP provision in the immediate area.  The plan must therefore provide additional Primary Care capacity into the Garden Village by reserving land for healthcare facilities and through financial contributions towards the financial cost of healthcare provision.	Paragraphs 12.2, 12.5 and 12.6 should make explicit reference to healthcare. A new paragraph should be added after 12.18 about healthcare and the need for the Garden Village to provide quality primary healthcare facilities for its residents.	No
151/04/SG1/LC/US1&3	Matthew Symons	Hollins Strategic Land	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01	N/A	LC	US/1 US/3	The Proposals Map sets out the broad area of growth for Bailrigg Garden Village. There does not appear to be a sound reason for the area of search extend this far south and it is not clear what the various dashed lines represent along the boundary.	This area should be removed from the Bailrigg Garden Village broad area of growth.	Yes
190/02/SG1/LC/US2	Michael Mumford	Lancaster and Morecambe Liberal Democrats	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01	N/A	LC	US/2	We believe there is a lack of evidence of either pent-up demand or prospective demand for accommodation on the Bailrigg Garden Village site on the scale envisaged. It is our experience that university staff typically live some distance away from the campus and prefer to do so.  We submit that strategic areas of separation are needed to the South and West of Bailrigg Garden Village scheme to ensure that urban settlement does not in fact envelop the villages of Ellet and Galgate in South Lancaster.  The new material that the Council have added does not deal adequately with infrastructure and how this would be handled in a plausible timescale. In particular the traffic analysis shows bottlenecks but specifically rules that there is no need at this time to propose solutions. [Further detail provided in the representatives full response.]	No suggested amendments made.	
169/09/SG1/LC/US1-4	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01	N/A	LC	US/1 US/2 US/3 US/4	CEP support the identification of the Garden Village as a strategic site for new housing growth and would emphasise CEPs commitment to engaging in the masterplanning process. However, given the integral role the Garden Village will play Policy SG1 should formally allocate the site for the delivery of 3,500 homes, not merely identify it as a broad area of growth. Without a clear allocation, sufficient certainty cannot be provided that the district's housing requirements is deliverable and the therefore the DPD cannot be considered effective or sound.  The Council's preferred mechanism for moving forward this application is through the creation of a Garden Village Area Action Plan DPD. CEP considered that should a local plan document be considered essential (and CEP are by no means certain this is the case) then the most appropriate means of adopting a masterplan would be through a supplementary planning document as opposed to an AAP. An SPD would constitute a quicker and more flexible mechanism whilst still enabling the Council to carry out consultation and evidence base work to ensure a robust masterplan is adopted for the site.  It is logical in terms of infrastructure and service provision that CEPs site is delivered in the first phase of the Garden Village. To prevent this through the DPD would not be sound. Whilst it is appreciated that the masterplanning for the Garden Village is at an early stage it is important that the principles of SG1 are clarified, in particular the provision of a district centre to serve both the new population of the Garden Village to address deficiencies in South Lancaster. [Further detail provided in the representatives full response.]	That consideration is given to moving forward the masterplanning for the Garden Village site through a Supplementary Planning Document.  That the policy text is revised to confirm that sustainable development can be brought forward in forward in the form of individual planning applications either in parallel with or ahead of the formal adoption of the Garden Village masterplan.	Yes
169/28/SG1/LC/US1-4	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01	N/A	LC	US/1 US/2 US/3 US/4	As previously stated, our client suggest that both the CEP site and the wider land holdings at Whinney Carr are capable of being delivered in the short term without giving rise to severe harm to the local highway network or necessitating the delivery of any strategic highway improvements. [Further detail provided in the representatives full response.]	It is logical that CEPs site should be delivered as an early phase of the Garden Village within the first five years of the plan period. To prevent this through the DPD would not be sound. In order to ensure the Policy is positively prepared and effective, CEP request that the policy text associated with Policy SG1 is revised to confirm that sustainable development can be brought forward either in parallel with or ahead of the formal adoption of a masterplan or SPD for the Garden Village.	Yes
008/01/SG1/LC/US3	Darren Jones	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01	N/A	LC	US/3	Concern raised over the use of that to the rear of properties on Hevenham Close. The January 2017 Position Statement for Bailrigg Garden Village stated (para 7.9) that access to the development should be achieved via Blea Turn Road. If the future scheme involved the creation of a new road / access in this area then objection is raised in terms of noise and traffic fumes which would be created, impacting on local residential amenity. Objection is also raised on behalf of residents of the new Garden Village because traffic would also flow in return back through the same route with traffic seeking an expedient route towards the M6.	No suggested amendments.	No
176/01/SG1/NLC&3/US2&3	Simon Milner	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01	N/A	NLC/2 NLC/3	US/2 US/3	Objection to Bailrigg Garden Village. The traffic is already horrendous on the A6 through Scotforth and approaching Lancaster, building thousands of new homes will create gridlock and dreadful air pollution. Reconfiguring Junction 33 on the M6 will make no difference to the traffic problems in South Lancaster.	No suggested amendments made.	No
128/04/SG1/LC/US1-4	Aqub Saghir	NIL Consulting on behalf of Persimmon Homes	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01	N/A	LC	US/1 US/2 US/3 US/4	The overall creation of the Bailrigg Garden Village is support by our client. The Council should aim to produce an Area Action Plan as soon as possible so to not delay development.  We welcome the Council stating development which will prejudice the delivery of the Garden Village will not be permitted. However, development prior to the completion of the masterplan should be supported and approved where it can be demonstrated that it does not prejudice the development of the wider site and the delivery of the Area Action Plan for the Garden Village.  The plan should make scope for additional homes to be delivered on this site than anticipated. The Plan should state at least 1,655 units are anticipated or be delivered and support early delivery where appropriate. This can only be seen as an advantage and will encourage further development within this strategic site.	No suggested amendments made.	No

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Intent) ATTENDING EXAMINATION
029/03/SG1/LC/US1-4	Adam Key	Savills on behalf of the Bailrigg Farmland Trustees	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01	N/A	LC	US/1 US/2 US/3 US/4	We support the Government's approach to Garden Village concepts and the principles of creating a high quality development at Bailrigg. However, in light of the position in respect of housing delivery, we consider it essential that the Garden Village status does not delay development which could otherwise come forward. The Garden village must ensure that delivery rates are not further diminished. From a delivery perspective there are no reasons to stop the Bailrigg Lane area coming forward as part of the early phases of the Garden Village.  As landowners, we are being asked to either support or object to the Garden Village proposals with no detail available explaining what is involved, what the key policy outcomes are, what are the trigger points, rates of delivery and infrastructure burdens. The Council's approach of pushing all of the detail into a DPD is not sufficient for this Local Plan process. The detail of the Garden Village goes to the heart of deliverability and therefore to its soundness. The DPD process is not always subject to independent examination and therefore is an insufficient mechanism to deliver these proposals. [Further detail on this matter is contained in the full response.]	We would wish for the masterplanning, the key infrastructure requirements, realistic delivery rates and short term delivery opportunities to be considered and tested as part of the Local Plan process. Subsequent detail can be worked up through the DPD process, but not the fundamental principles which go to the heart of the Garden Village.	Yes
033/02/C12/LC/US2-3	Diane Coward	Scotforth Parish Council	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01	N/A	LC	US/2 US/3	From a parish perspective we believe that the Garden Village should make a significant contribution to the housing needs of the district but that it should be distinct, sustainable and properly separated from the southern edge of Lancaster, Galgate and the University. Without such separation it would become an urban extension and not be a Garden Village. Similarly we believe that the existing settlement on Burrow Heights and Bailrigg Hamlet need to be separated.  We have reviewed the evidence presented and are still surprised by the lack of substantive documents regarding plan for Lancaster South. Our understanding is that the Local Plan should be comprehensive and supported by evidence yet there appears that this key proposal has little evidence to support it. The Lancaster South AAP has not been published and for this reason alone, that part of the Plan must be unsound.  Unfortunately there is no evidence to demonstrate that the infrastructure proposals identified will solve the congestion issues in South Lancaster, this is accepted in paragraph 8.1.21 of Part A of the Transport Assessment. Consequently we see a fundamental problem with the Plan which is built on schemes over which the City Council have no control with decisions on funding being made elsewhere. There is no documentary evidence to support these aspects of the Plan and, as a result, it must be concluded that it cannot be provided that the transport system will be able to support the growth on the scale proposed.  Regarding the Bus Rapid Transport, it is generally welcomed as it improves the connection between South Lancaster to the city but this does not address fundamental problems in the city centre. It is not clear that this can be physically achieved in viability terms and consequently a further reason why the plan is unsound in its current form. [Further detail provided in the representatives full response.]	It is clear that the proposed transport infrastructure will not have the capacity to support the 3500 new houses proposed for Lancaster South without major traffic disruption and traffic jams on the city's southern approach. The number of dwellings should be reduced to 2000 in the Plan and further assessments made in light of experience with increased traffic flow from that number of dwellings before any increase in the number is proposed.	Yes
163/15/SG1/LC/US3	David Diggle	Turley on behalf of Peel Holdings Investments	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01	N/A	LC	US/3	Peel strongly support the identification of the Whinney Carr site and the wider Garden Village area. The Garden Village represents the best opportunity to deliver a step-change in housing delivery for Lancaster. The Garden Village is well placed to deliver Lancaster's growth ambitions, integrate with the University, provide a sustainable mixed use community and economic development. There has been a significant step change in the delivery mechanisms for the Garden Village, with the intention to develop an Area Action Plan (AAP). However, the mechanism proposed is not necessary and appropriate and, in our view, may lead to delays or a lack of flexibility. Peel questions the use of the AAP as the current housing requirement is suppressed and there is no flexibility within the allocations for disapp, therefore the quickest routes to delivery must be found. The process of production of an AAP is defined by statutory procedure which will introduce delays. As currently worded, Policy SG1 prevents the delivery of the Garden Village in advance of the AAP which restricts flexibility and may limit the Council's ability to react quickly and effectively to opportunities that may arise in the short term. Peel remains of the view that there are opportunities, particularly to the north of the site for initial phases of development to come forward sooner than currently envisaged by the Plan. Peel disagrees with the premise that any early development will automatically generate and properties that sustainable development that does not trigger strategic highway improvement should be permitted ahead of / in tandem with the preparation of a Spatial Development Framework. Peel support the broad scale of the proposed uses for the Garden Village. However, elements of policy are questioned which include the need for employment uses, the positioning of the local centre, the requirements for education and proposed sources of funding, the role of district heating and masterplanning and application requirements. [Further detail provided in the representatives full response.]	As a practical alternative and to assist with robustness and flexibility, Peel suggest the use of Supplementary Planning Document (SPD) to provide the spatial development framework and expand on detailed strategic policy. Alternatively, the Council could consider the use of a SPD as an interim flexible tool or measure whilst the AAP is being prepared. This has been used by other authorities such as Knowsley. This approach would enable rapid and flexible delivery of the Garden Village, keeping the Council's delivery options open.	Yes
163/13/SG1/LC/US1&4	Elinor George	Turley on behalf of Peel Holdings Investments	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01	N/A	LC	US/1 US/4	Peel have prepared a technical note which reviews the transport evidence prepared by the Council. Whilst agreeing with the general approach to undertaking the assessment in the absence of a strategic transport model and notwithstanding the positive conclusions reported in the WYG work there are a number of observations made over the approach taken (these are set out in more detail within the representatives full response).  The consequences of these observations are that the WYGs report overestimates the predicted impact of the Local Plan proposals on the highway network and therefore potentially underestimates its potential to accommodate development in the short term.  Evidence prepared on behalf of Peel in this matter shows that with the short term highway improvements identified by WYG (with the exception of Pointer Roundabout) development could come forward in South Lancaster without resulting in 'severe' harm to the highway network. [Further detail provided in the representatives full response.]	That land at Whinney Carr, South Lancaster is capable of early delivery within the plan and that it should be given its own site -specific allocation within the Strategic Policies & Land Allocations DPD.	Yes
163/14/SG1/LC/US1&3	Elinor George	Turley on behalf of Peel Holdings Investments	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01	N/A	LC	US/1 US/3	The Council have not completed a viability appraisal for the broad area of growth, Peel notes this is to be completed as part of the Area Action Plan (AAP). In the meantime Peel is completing an internal viability appraisal to demonstrate that the Whinney Carr site is capable of delivering residential development whilst facilitating the delivery of required associated infrastructure.  Turley Development Viability have prepared a critique of the LSH work and have a number of concerns over the assumptions used. Each of these issues are likely to have an unnecessarily adverse effect on the viability of sites. This will result in the under delivery of affordable housing and other planning obligations subsequently perpetuating the unmet need of housing in Lancaster. [Further detail provided in the representatives full response.]	No suggested amendments made.	Yes
163/15/SG1/LC/5	Elinor George	Turley on behalf of Peel Holdings Investments	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01	N/A	LC	S	Our clients have completed a landscape appraisal provides detailed comments comprising the City Council's landscape evidence base. This has been appended to the full response from the representative. The appraisal concludes that there are no overriding landscape constraints which present an obstacle to the sensitive development of the area. It also determines that the site at Whinney Carr and adjoining land to the west of the West Coast Mainline is a sustainable and achievable location to be allocated for housing development and the masterplan demonstrates it is capable of delivering c.1000 dwellings whilst retaining and mitigating harm to the visual receptors. A further 100 units could be delivered on the C17 land.	That land at Whinney Carr, South Lancaster is capable of early delivery within the plan and that it should be given its own site -specific allocation within the Strategic Policies & Land Allocations DPD.	Yes
163/16/SG1/LC/5	Elinor George	Turley on behalf of Peel Holdings Investments	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01	N/A	LC	S	The SFRA identifies that the Whinney Carr site is in Flood Zone 1 and is therefore at a low risk of flooding. There is an area to the NW of the site which is at medium high risk of surface water flooding, however any development in this area would seek to use this location as part of the Sustainable Drainage System (SuDS). As such there are no flooding issues to prevent development.	No suggested amendments made.	Yes
163/17/SG1/LC/US1&3	Elinor George	Turley on behalf of Peel Holdings Investments	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01	N/A	LC	US/1 US/3	The ecological appraisal confirms that the majority of the Whinney Carr site comprises improved grassland which is of relatively low ecological value. As such there is no ecological constraints to development.	No suggested amendments made.	Yes
163/18/SG1/LC/US1&3	Elinor George	Turley on behalf of Peel Holdings Investments	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01	N/A	LC	US/1 US/3	Peel asserts that the 2018 SHELAA should conclude that the land at Whinney Carr is deliverable. The scope for early delivery on the Whinney Carr site either with or alongside the preparation of a Garden Village SPD should be explored further and contribute towards the short-term housing needs of the district. [Further detail provided in the representatives full response.]	The SHELAA should be added to address the inconsistencies identified.	
078/02/SG1/LC/US1-2	Peter Shannon	WYG on behalf of Drinkwater Mushrooms	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01	N/A	LC	US/1 US/2	Whilst we do not object to the principle of Policy SG1, my clients consider that the boundaries of the emerging broad area of growth should be revised to better represent the current context. Specifically, Condergarth Farm is shown directly adjacent to the boundary. This makes no sense and for a number of reasons and earlier iterations showed a proportion of this site within the boundary. By including this land within the broad area of growth it will help better facilitate for a desired brownfield site and can ensure the site is developed in according to the policies and design principles set out in Policy SG1. [Further detail provided in the representatives full response.]	It is considered that the boundary of the 'Broad Area of Growth' should be revised to include the whole area of Condergarth Farm.	Yes
148/06/SG1/LC/US1&3	Jon Power	CBRE on behalf of Lancaster University	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01	N/A	LC	US/1 US/3	Whilst the University are supportive of the allocation of Bailrigg Garden Village, it is important that the Plan safeguards, recognises and reflect the future growth aspirations of Lancaster University as a sensitive campus ecosystem and key economic asset.  The University has recently acquired land at Forrest Hills and has land holdings on both sides of the M6. This land, together with the main campus and emerging Health Innovation Campus form integral components for the University's future growth strategy. It is essential to the University that the future growth of its campus is spatially reflected in the Plan support future economic growth, safeguard areas of the Garden Village that are under the University's control, ensure that the University's expansion plans can be synthetically integrated but not intrinsically tied to the Garden Village and associated DPD, allow for the University to bring forward a range of uses that would make a positive contribution to the area and deliver infrastructure improvements.  The Garden Village has the potential to impact on the University through new residents, additional vehicle movements, a new local centre and increased social development. Whilst the University is supportive of this vision, any development within the surrounding area must be balanced and sensitively considered against the existing campus. Therefore the phasing and delivery of the Garden Village must ensure no detrimental impacts on the current / future operation of the A6 and a high quality of built environment. Furthermore, the future development of the University estate is something that the University will seek to pursue outside of the proposed Garden Village DPD given the policies relative infancy. [Further detail provided in the representatives full response.]	It is requested that the Local Plan Policies Map is amended to identify the University's existing and future campus boundary, including land that is within the University estate. This includes the Bailrigg Campus, Lancaster University Health Innovation Campus and Forrest Hills Conference Centre & associated land. A plan is provided by the representative to identify these areas which is included within the full response.  To support the recognition of the University's wider campus, Policy SG1 should be amended to reflect the aspirations of the University in relation to its campus extension, the mix of uses proposed and the aspirations of the University to prepare a masterplan for its future growth. Detail wording amendments to Policy SG1 are suggested by the representative in their full response.	Yes
094/02/C12/NLC1&2&5/US3-4	Helen Wilkinson	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	NLC/1 NLC/2 NLC/5	US/1 US/2 US/3 US/4	I am extremely concerned about the increasingly confusing consultation process. I was under the impression that the consultation had ended in April 2018. It was surprising then to be consulted again in October 2018 only to discover these modifications were withdrawn. The comments from the Planning Inspector support this. I note that the government's guidance state "the evidence needs to inform what is in the plan and shape its development, rather than being collected retrospectively". The Lancaster Local Plan contravenes this government guidance making it unsound.  The way in which the information has been provided contravenes this guidance as providing 2000 pieces of evidence when the consultation was not complete is not acceptable for local communities, many people did not receive the email notifications that consultation was taking place. There was no additional consultation events. Again it appears that Lancaster has not followed due process, which provides little confidence in their ability to have developed the plan on sound evidence. The data is still unsound and very contradictory. Original objections for the Garden Village remain. [Further detail provided in the representatives full response.]	No suggested amendments made.	No
015/01/C12/LC/US1-4	Jackie Pye	Not Applicable	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	The DPD is speculative and flawed, questions need to be addressed about whether the infrastructure required is feasible. New development will create congestion on the A6 between Galgate and Lancaster. Does Lancaster actually need this amount of new homes? The property market is stagnant with property being sold at vastly reduced prices. There is no evidence of future economic growth in the district.	No suggested amendments.	No
194/01/C12/LC/US1-4	Roberta Kerr	Bailrigg Village Residents Association	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	We are concerned that the Local Plan does not have a viable strategy for South Lancaster and there is a lack of ambition and vision for the contribution that garden villages and well planned infrastructure can deliver and also a lack of value placed on existing rural communities, like Bailrigg Village. Not only does the published transport assessment evidence not support the scale of growth proposed by Policy SG1 but also the disappointing lack of the associated Area Action Plan would provide evidence for what is probably the key strategic initiative surely means that the Local Plan is unsound and not positively prepared. [Further detail provided in the representatives full response.]	Amendments proposed to policies SG1, SG2 and SG3, these amendments are set out in the representatives full response.	
106/01/SG1/LC/US1-4	Craig Barnes	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	Barton Willmore on behalf of Storey Homes have provided full and detailed submissions in relation to Bailrigg Garden Village. Due the scale and detail of the representation received these have not been summarised and can be viewed in full only.	Suggested wording and recommended amendments are provided within the representatives full response.	Yes
055/03/C12/LC/US1-4	Professor Stephen Constantine	CLOUD - Citizens of Lancaster Against Unnecessary Development	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	Objection raised to the identified of Bailrigg Garden Village, the representation is supported by a substantial response which sets out in detail the reasoning behind this view, key issues include  The location of River, Beck and flooding which will exacerbate flooding issues within the local area. High road infrastructure costs which affect development viability and create funding uncertainties. It is not clear that the infrastructure requirements have been adequately costed, that it is comprehensive and can be delivered. How it will be funded and to why residents have not been updated on this matter. Traffic and Transportation - the new development will generate significant number of new residents and associated trips on the local road network. The lack of essential transport analysis on the impact on the local road network means that adoption of the plan which includes the Garden Village is premature. Air Quality - increasing traffic on local road network will have significant impacts on local air quality which have not been assessed and measures. The volume of traffic that the Garden Village will generate will put lives in danger as the levels of air pollution continue to soar. Health Services and Education - new development will place greater demands on these services. Garden Village Boundaries - The removal of areas of separation within the Plan (removing those which were identified in the Draft Local Plan) is unacceptable. The Garden Village boundaries have expanded since the Draft Plan stage which is not acceptable. The lack of areas of separation is contrary to national planning policy which expects Garden Villages to be self contained, including the establishment of appropriate 'Green Belt' around or adjoining new development'. This has not been achieved with Bailrigg Garden Village. [Further detail provided in the representatives full response.]	Provision of specific information and costs (even for the initial period) to enable Lancaster citizens to properly assess the impact of the Garden Village. The proposal should be removed from the Local Plan until such a time as information is publicly available to demonstrate that it is viable, deliverable, sustainable and affordable.	Yes
055/04/C12/NLC5/US1&5	Professor Stephen Constantine	CLOUD - Citizens of Lancaster Against Unnecessary Development	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	NLC/5	US/1 US/5	We are concerned by what has been an increasing confusing consultation process that has been extremely difficult for members of the public to engage with. Our detailed response provides a timeline of this consultation process. We observe from Government guidance that evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively. [Further detail provided in the representatives full response.]	No suggested amendments made.	Yes

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Intest) ATTENDING EXAMINATION
055/06/C12/LC/US1&2	Professor Stephen Constantine	CLOUD - Citizens of Lancaster Against Unnecessary Development	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2	<p>With regard to the Supporting Inclusive Economic Growth Report, the findings of this report contradict the findings laid out in the Plan and reinforces CLOUD's original objections that the Plan is not sound and not positively prepared.</p> <p>The report provides none of th evidence to justify the job projections with respect to South Lancaster including the Innovation Campus or the Canal Corridor and omits to mention the Agri-Business Centre. The Hall Atkison Report makes no mention of the claimed 2,000 new jobs associated with the innovation campus nor additional jobs at the university. There overview of the Campus emphasises the SME assists that will be associated with its development. Critically the majority of these will not relate to digital technology, but to management and organisational support to existing SMEs and as such unlikely to lead to these companies choosing to local on campus. There is no mention of the University's growth aspirations which were mentioned in the Plan, presumably because they are nothing more than aspirations in an era of deep uncertainty in higher education.</p> <p>The evidence in this brief report confirms our view that the Plan is unsound. The evidence on job growth has not been positively prepared and the additional evidence conflicts with statements on the Plan relating to the impact on Lancaster employment from the Innovation Campus. This in turn has implications for the soundness of the funding bid for HIF. [Further detail provided in the representors full response.]</p>	No suggested amendments made.	Yes
055/06/C12/LC/US1-4	Professor Stephen Constantine	CLOUD - Citizens of Lancaster Against Unnecessary Development	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	<p>With regard to the Housing Land Monitoring Report and 5 year land supply position. Our view remains that the Plan significantly overstates Lancaster's Housing Need and is therefore not justified, not consistent with national policy and not effective. Our original objections to this matter remain.</p> <p>CLOUD have commissioned and received an independent analysis of the demographic trends behind the forecasts of Lancaster housing needs. CLOUD wishes to have him speak on these issues at the Examination Hearings.</p> <p>In the 5 year housing land supply position, the local housing need is assessed as just 131 houses per annum, as calculated using the currently approved methodology. We understand this methodology may be subject to review and revision, but it must remain of great significance given the difference between it and the target of 522 in the Plan. It cannot be appropriate to over allocate housing land to this degree.</p> <p>As a result we confirm our view that the housing need statistics are not justified and would add that they are not positively prepared. We would also refer back to our concerns over jobs, especially in South Lancaster. [Further detail provided in the representors full response.]</p>	No suggested amendments made.	Yes
055/07/C12/LC/US2-4	Professor Stephen Constantine	CLOUD - Citizens of Lancaster Against Unnecessary Development	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/2 US/3 US/4	<p>With regard to the Flood Risk Assessment, this report provides a detailed assessment of 9 sites and their suitability for development. We note that the Garden Village nor any of the areas affected by severe flooding in November 2017 are covered by this report. Therefore our objections to the Local Plan in this regard remain.</p>	No suggested amendments made.	Yes
055/08/C12/LC/US3&3	Professor Stephen Constantine	CLOUD - Citizens of Lancaster Against Unnecessary Development	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/2 US/3	<p>With regard to the Infrastructure Delivery Schedule, in our April 2018 response to the Local Plan we commented on the exceptionally high road infrastructure costs associated with the Garden Village. The schedule provides some information in terms of costs and adjustments to junctions however it uses the lower end of the estimate range, our concerns over low estimates remains unchanged.</p> <p>It should be highlighted that there is a high dependency on securing HIF monies to deliver infrastructure. Lancaster is one of 44 bids for this fund. The Government have made clear that 80% of this fund will go to 50% of LPAs which have the least affordable houses compared to wages. Lancaster is not in such a position. There are also questions over the level of jobs used in relation to this bid and the discrepancies between those quoted in the Local Plan. [Further detail provided in the representors full response.]</p>	No suggested amendments made.	Yes
055/09/C12/LC/US1-4	Professor Stephen Constantine	CLOUD - Citizens of Lancaster Against Unnecessary Development	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	<p>With regard to the Viability Assessment, the evidence presented by CLOUD raises questions of viability given the level to developer contributions. We note the viability assessment reports were not completed until after the publication of the Plan. The NPFF requires careful attention to viability and costs int plan-making and therefore we query how the Local Plan can be described as sound when it was prepared before the viability report was available. In conclusions this report does not alter our objections to the soundness of the Plan. [Further detail provided in the representors full response.]</p>	No suggested amendments made.	Yes
055/10/C12/LC/US1-3	Professor Stephen Constantine	CLOUD - Citizens of Lancaster Against Unnecessary Development	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3	<p>With regard to the Transport Assessment (Stage 1 and 2), the report acknowledges its limitations in the absence of an up-to-date strategic transport model. These constraints mean that the report fails to address the traffic and transport issues on which our original objections were raised. The parts of the Local Plan which we consider to lack soundness and our reasoning behind this are summarised within our detailed response. Our objections to the Local Plan still stand in relation to this matter and are not addressed by these assessments. [Further detail provided in the representors full response.]</p>	No suggested amendments made.	Yes
055/11/C12/LC/US1&3&4	Professor Stephen Constantine	CLOUD - Citizens of Lancaster Against Unnecessary Development	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/3 US/4	<p>With regard to the Air Quality Position Statement, this document describes the air quality regulations and then assesses the local air quality in Lancaster. However, this statement does not constitute a full air quality assessment and this is what is needed to justify the developments proposed in the Local Plan. None of the improvements seem in air quality are a result of the Council's own air quality action plan. Our previous views on this matter remain unchanged.</p>	No suggested amendments made.	Yes
055/12/C12/LC/5	Professor Stephen Constantine	CLOUD - Citizens of Lancaster Against Unnecessary Development	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	5	<p>With regard to the Open Space Study and Playing Pitch Assessment and Action Plan, these studies does not impact on the soundness issues raised by CLOUD in respect of the Plan.</p>	No suggested amendments made.	Yes
055/13/C12/LC/5	Professor Stephen Constantine	CLOUD - Citizens of Lancaster Against Unnecessary Development	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	5	<p>With regard to the Landscape, Townscape and Visual Field Summary Report, this is a comprehensive and detailed report, however it does not affect our objections to the soundness of the Plan.</p>	No suggested amendments made.	Yes
055/14/C12/LC/5	Professor Stephen Constantine	CLOUD - Citizens of Lancaster Against Unnecessary Development	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	5	<p>With regard to the Key Urban Landscape Review, 2 sites which are assessed appear to fall within the boundary of the Garden Village however it is not clear what the significance of this might be for the development of the Garden Village. Also given some of the Key Urban Landscapes are described as buffer sites, we wonder why such buffer zones have not been created to separate the garden village sites from the existing housing in South Lancaster</p>	No suggested amendments made.	Yes
055/15/C12/LC/US1-4	Professor Stephen Constantine	CLOUD - Citizens of Lancaster Against Unnecessary Development	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	<p>With regard to the Identified Sites - Landscape and Visual assessments, this report provides a high level landscape assessment for a number of strategic development sites in the district, including Bailrigg Garden Village. The report is dated 2018 but only published in January 2019 which gives rise to 2 objections, firstly the report should have been issued by the Council when it was received in July 2018 and not at such a late stage and secondly at the Publication Version of the Local Plan has not addressed the cost and capacity issues raised by this report in respect of the Garden Village, this reinforces our original objections to the soundness of the Local Plan.</p>	No suggested amendments made.	Yes
079/02/C12/LC/US1-4	Sara Bundy	Ditto	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	<p>The additional evidence has been disjointed and extremely difficult to fit into plans of Bailrigg Garden Village. My previous comments still remain and no information submitted leads me to believe that there is a coherent workable plan to incorporate this vast number of homes into Lancaster without significant traffic, flooding and unemployment. I do not consider the plan and additional information sound on the grounds I stated in my previous submissions.</p>	No suggested amendment made.	No
076/02/C12/LC/US1-3	Warren Hilton	Highways England	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3	<p>The identified strategic growth areas in Lancaster are all located near to the Strategic Road Network (SRN). There remains a lack of robust evidence demonstrating that any reduction in capacity for trips through and within the city centre will not lead to local trips being displaced onto the M6 or for the extent to which reasonable alternatives to the private car will address these issues on the local network.</p> <p>The transport evidence base should clearly show how the assumptions used to account of any rapid transit public transport system in relation to the size of development being proposed. As yet HE are not aware of any robust evidence in place to demonstrate what impact a defined public transport based solution would have in reducing private vehicle usage. It is not yet known what form or design proposed housing developments will take or indeed the effect they may have on public transport or the use of private car. HE recognises that some access will be required to the SRN in this location, however planned growth cannot simply be reliant on the availability of capacity on the SRN for future access and travel needs.</p> <p>There also need to be a better understanding of the restriction of HGV movements through the city centre and using this as a potential option to divert other private vehicles in future, as simply diverting traffic onto the SRN to address local road network capacity and air quality issues is not acceptable. [Further detail provided in the representors full response.]</p>	HE would welcome further engagement with the Council in relation to the reconfiguration of Junction 33 of the M6 and to understand the impact of implementing a HGV Movement Strategy as set out in paragraph 12.37. It will be vital that the Lancaster City Centre Movement Strategy takes account of transport evidence arising out of the Plan (and is not developed in isolation) so it is aligned with planned growth, supports future sustainable development and includes appropriate mitigation measures to ensure the SRN is not adversely impacted by its implementation.	
105/04/SG1/LC/US3	Nicola Elsworth	Homes England	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/3	<p>As a designated Garden Village and part of the Government's locally led Garden Village initiative, Homes England support the principle of Policy SG1 as this will start to provide the planning framework for the development of Bailrigg Garden Village.</p> <p>It is acknowledged that the proposed Policy SG1 comprises a broad area of growth, albeit with a defined geographical boundary and that accordingly much of the detail is deferred for a future Area Action Plan DPD. Homes England wishes to advocate the importance of expediting the production of the Area Action Plan DPD alongside the Local Plan in order to ensure that a robust planning framework is established as soon as possible. Homes England also wishes to advocate the importance of joint working on this matter.</p> <p>Homes England provides specific comments on the detailed policy wording for SG1 which is set out in more detail via the representors full response.</p>	<p>Clarify the plan period as up to 2034.</p> <p>Provide consistent referencing to Bailrigg Garden Village Area Action Plan DPD</p> <p>Clarify that both adjacent 'local communities' and those across the city area will be engaged in the planning and development of the Garden Village.</p> <p>Wording of Policy SG1 to be more explicit about the future development strategy for Bailrigg, in particular outlining key spatial decisions (i.e. phasing, land use locations, blue and green infrastructure) and what masterplanning stages will be expected.</p>	No
040/01/C12/LC/US1-3	Alan Whitaker	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3	<p>Does Lancaster need 12,000 new homes, is the population increase realistic? How much of the housing in this area will actually be affordable - the requirement for housing is not disputed, what is questioned is the Council to insist on it and deliver this given the private led nature of housing development. No figures are provided over the level of affordable housing will be delivered. The scale of development leads to the question of whether it is financially deliverable. There is also a lack of detail on infrastructure costs and how new infrastructure will be delivered. There is a lack of information on where job growth will be achieved - there is an unverified assumption that the university will deliver job growth. Without job growth the Garden Village will become reliant on commuting. It is not clear whether plans have been co-ordinated with major infrastructure providers such as power, sewerage and water. [Further detail provided in the representors full response.]</p>	Bailrigg Garden Village should be removed entirely from the Local Plan until such a time as the information is publicly available to demonstrate it is viable, deliverable and affordable. It is premature for the public to be asked to comment on the document.	No
014/01/C12/LC/US1-4	Andrew & Kathleen Fox	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	<p>The concept of Bailrigg Garden fails to meet the Government's own definition of Garden Villages that it is not a free standing settlement. The Council has failed to sufficiently explore brownfield land to sufficient meet future development needs. The economic growth potential of the district is not convincing and does not provide sufficient reasons for developing a Garden Village. The scheme relies heavily on the delivery of new infrastructure which would require significant public subsidy, new development should be channelled towards the Bay Gateway. The new Garden Village lacks innovation. [Further matters of detail are provided within the full representation.]</p>	No suggested amendments.	No
171/01/C12/LC/US2-3	Anne Windsor	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/2 US/3	<p>Objection to the Bailrigg Garden Village in relation to the impact on the local road network, in particular the A6, we are yet to be convinced over the visual separation of new development from existing residential areas.</p>	No suggestion amendments made.	No
013/01/C12/LC/US4	Ann-Marie Brown	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/4	<p>How will the additional traffic from the building of the Garden Village and subsequent residents be handled? There has been no thorough consideration of traffic management, a bypass, public transport etc. There are already traffic issues arising from building of the new Health Campus and University traffic in general. There is no detail on the funding of Junction 33 improvements.</p>	No suggested amendments.	No
119/01/C12/LC/US1-4	Anthony Blendall	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	<p>The greatly increase number of road movements generated from the Garden Village would create harmful levels of air pollution across the existing and proposed residential aread. The levels of future traffic would add significant burden to local road network, the plan does not provide an viable proposal for relief infrastructure which will address this matter.</p> <p>The plan, as currently drafted demonstrates no meaningful area of separation between the southern end of Lancaster and the Garden Village, the proposal would effectively create urban sprawl to the South of Lancaster.</p> <p>The need for new homes is considered to be over-estimated and does not reflect the local affordability of properties. There has been no calculation over the level of affordable housing which is required within the Garden Village, the costs of overall infrastructure (which are considered to be very high) will impact on the levels of affordable housing which can be delivered.</p> <p>There should be a most up-to-date assessment of flood risk which takes account of recent flooding events which took place in late 2017. [Further detail provided in the representors full response.]</p>	<p>Defer the inclusion of Bailrigg Garden Village in the plan, or a reduction in its scale until a viable non-polluting additional transport method can be designed and provided a calculation of affordable hosing is provided and a more up to date flood risk assessment is prepared. Reduce the extent of the Garden Village proposal by creating meaningful areas of separation. The level of housing projected should be scaled down.</p>	No
093/03/C12/LC/US1&4	Anthony Breakeell	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/4	<p>In the case of Bailrigg Garden Village, there is no evidence in the Plan to how infrastructure will be funded, actual infrastructure providers are not identified nor any indication that funds have been secured. Despite this the Plan does not contain any of the contingency arrangements that the DCLG call for in their 'Planning Practice Guidance and the Planning System' document published in May 2016 (paragraph 001).</p> <p>The proposed infrastructure impacts on Network Rail and Highways England. There is no indication that either of these bodies have been consulted regarding costs, feasibility or other impacts of these developments. This casts doubt on the soundness of the plan.</p>	<p>Withdraw Bailrigg Garden Village until such a time as the sources of infrastructure funding have been firmly identified.</p> <p>Write both Highways England and Network Rail to the Public Examination sessions to provide confirmation that they are content with the Garden Village infrastructure.</p>	Yes
075/01/C12/LC/US1-3	Anthony Newton	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3	<p>Development of an additional 12,000 new homes, 3,500 of which at Bailrigg Garden Village, will result in a huge increase in the population of Lancaster. There is no firm evidence that there are job prospects in the area for this huge population increase. This will result in greater levels of commuting.</p> <p>The funding required for the Garden Village is not yet secured and infrastructure costs are very high. There is no evidence or information on proposed areas of separation. There have been significant recent flood events in Galgate and new development will exacerbate the impacts of flooding.</p>	<p>Bailrigg Garden Village should be removed from the Local Plan until information is available to prove that it is deliverable, affordable and viable.</p> <p>Firm proposals and funding for Junction 33 modification and Environment Agency proposals to prevent flooding should be in place prior to the Bailrigg Garden Village being included in the Local Plan.</p>	No
038/01/C12/LC/US1-4	Beve/ley Whitaker	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	<p>Does Lancaster need 12,000 new homes, is the population increase realistic? How would local hospitals and GPs cope? Have plans been co-ordinated with major infrastructure providers including power, sewage and drainage and the crossing of the West Coast Mainline? Will there be a real area of separation around the Garden Village? There is no provision in the Local Plan to address flood risk issues. The necessary funding for this project has not been secured.</p>	Bailrigg Garden Village should be removed from the Local Plan until the information is available to show that it is viable, deliverable and affordable. It is premature for the public to be asked to comment on the document.	No
153/01/C12/LC/US1-3	Callum Furner	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3	<p>Objection to the Garden Village proposal. The residential needs are based on unrealistic assumptions about graduate retention. The area of separation being proposed is non-existent, new development will exacerbate existing flood risk issues in the locality, the Council do not appear to have made an impact assessment of how additional car journeys will affect local congestion and air pollution. It is not clear how the Cycling and Walking Superhighway will be delivered. Has an impact assessment been made into how water runoff will affect Ous Beck? The reconfiguration of Junction 33 is not substantiated and it is not clear how it will be delivered or funded. There is a clear funding gap in the delivery of infrastructure. There is no information on how new school places will be created and does not specify how future health requirements will be met. [Further detail provided in the representors full response.]</p>	I believe that the Garden Village should be removed from the Plan until such a time as information is publically available to demonstrate that it is viable, deliverable and affordable. The consultation on this proposal is premature due to the lack of information.	Yes
120/01/C12/LC/US1-4	Carl Machulec	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	<p>Concern raised over the development of Bailrigg Garden Village, while the Bay Gateway has eased traffic north of the River Lune, it has done nothing to ease traffic to the south and along Scottforth Road (A6). The Pointer Roundabout and Galgate and very congested and new development will only exacerbate these issues. Just recently we have witnessed the worst flooding in recent history which will be made worse through new development.</p> <p>Lancaster has never seen so much housing built, do we really need 12,000 more homes? Is it realistic to expect significant levels of population increase? Is there sufficient capacity in local health and education places and how will improvements be funded? Given the high infrastructure costs is development viable?</p>	Bailrigg Garden Village should be removed from the Local Plan until it is positively deliverable, viable and affordable and all questions of doubt answered.	No

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Inter) ATTENDING EXAMINATION
121/01/C12/LC/US1-4	Carol Elaine Hollis	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	Concerned over the Garden Village for several reasons, the volumes of traffic on Southport Road would be significantly increased as a result of this development. Has the impact on the environment been considered? What about all the exhaust fumes from vehicles? I am also concerned over the impacts on infrastructure in terms of capacity in schools, buses, sewerage and health care and how improvements in these will be funded. There has been significant flooding in the local area. Where will residents of Bairrig Garden Village find employment?	Bairrig Garden Village should be removed from any Local Plan because it is not affordable and not viable.	No
089/01/C12/NLC/US1-3	Christine Lea	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	NLC/2	US/2 US/3	I consider the proposed plan for the Garden Village is unsound on the grounds that there is no available evidence to support that it is realistic, deliverable and affordable. This part of the plan should be removed until local residents can be provided with sufficient information that there is genuine need for such a large development. As currently drafted, Policy SG1 has a great many aspirations and very little concrete information on how the key principles will be delivered. It is therefore premature to be asking for comments given this lack of information.  The delivery of new housing and projected population growth is not realistic and cannot be supported by the current education, health and local services. There is no evidence how these infrastructure shortages will be addressed or funded. The potential areas of growth have expanded significantly since consultation on the draft Local Plan in 2017 with the areas of separation removed. There has been no explanation given as to the apparent increase in the Garden Village which begins to resemble the size of a small town which will subsume Galgate in large urban sprawl.  There is an expectation that the Health Innovation Campus will provide in the region of 2,000 jobs is more of an aspiration that a realistic projection. There is no evidence of any businesses intending to locate onto the Campus. The most recent Turley report does not indicate any massive increase in employment so where will the people living in the Garden Village going to be employed?  The Local Plan does not address whether the necessary tests relating to flood risk (for example Sequential Test) have been carried out, and if so what were the outcomes. What flood risk assessments have been carried out in relation to the Health Innovation Campus and what were the results? [Further detail provided in the representatives full response.]	No suggested amendments made.	No
042/01/C12/SG1/LC/US3	Clare Rogerson	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/3	Pleased to see that the Local Plan takes into account the need for a sustainable future. However I am concerned over the levels of congestion which would be generated from new development, particularly at peak times. Whilst it is noted that the Council propose new bus and cycle routes have they assessed how many extra car journeys will be generated as a result of the Garden Village? There has been significant flooding in the locally recently which has been exacerbated by surface water run-off from non-permeable surfaces, further development in this area will make this issue worse. Whilst water storage areas have been suggested will these be sufficient and safe to local people? Many of the current suggestions are aspirations and desirable and it is not clear whether the funding will be available or be sufficient to meet infrastructure requirements. It is not clear where residents in the Garden Village will be employed and whether there are sufficient opportunities for economic growth within the area.	No suggested amendments made.	No
170/01/C12/LC/US1&2&4	Chff Windsor	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/4	Objection to the Bairrig Garden Village, the proposals do not constitute a Garden Village, there is considerable doubt in the accuracy of the opportunities for employment growth. Given the time and money spent on new road infrastructure to the north of the city new growth should be targeted in this location. The levels of growth proposal would significantly affect the character of Galgate in its own right.	No suggestion amendments made.	No
141/01/C12/SG1/LC/US1-3	Clr Abi Mills	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3	Having listened to the concerns of many residents in my ward and across the district the key area of concern is the proposed Bairrig Garden Village. Whilst I am not against the concept of a Garden Village and do appreciate the need for new housing in the district, the proposals are not sound for the following reasons:  The Garden Village will not be a Garden Village, it will merely be an urban extension of Lancaster. Regardless of design there is no element of village to this. The number of houses needed in the district is based on dubious data and over estimates need. I have grave concerns over how new sprawl will affect various aspect of life in my ward include the extra car journeys generated and the associated congestion. I believe that the Garden Village is not realistically deliverable due to the high infrastructure costs. There is no evidence to how new education and healthcare will be funded which will be necessary to serve the extra residents in this area.	I would suggest that the Garden Village should be removed from the Local Plan until such a time as information is publicly available to demonstrate that it is not only viable and deliverable, but also necessary.	No
084/01/C12/SG1/LC/US1-3	David Ford	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3	It is unclear as to whether there will be a real area of separation around the Garden Village, the proposal map does not seek to indicate any separation. There have been significant flooding issues in Galgate in 2015 and new development will exacerbate these problems. Has the Council researched how many extra car journeys will be created from the Garden Village? Congestion and air pollution is already an issue and the Garden Village is likely to increase these issues. There is little information on how a Cycling / Walking Superhighway will be created and delivered. There is little detail on what is meant by the reconfiguration of Junction 33. There is a funding bid made but funding is not secured, the amount needed is large and suggests a substantial amount of private sector contributions will be needed.  There is no evidence that Lancaster needs the amount of new homes proposed and population projections are unrealistic. How would the high number of new homes impact on local house prices? It is not clear how additional school places will be funded and there is no reference to improved health facilities.  Where will the new residents of the Garden Village be employed? There are no guarantees that this will be in the local area so will increase journeys on the local road network. There is no information as to whether local infrastructure providers (eg sewerage, power and drainage) will be coordinated in the plans.	The Garden Village proposal should be removed from the plan until further work has been completed to allow it to be fair judged as viable, deliverable and affordable. It is premature to be making comments on the Garden Village proposal given the completion of the detailed DPD will only be finalised in 2020. Given these timescales it is very unclear as to what that public are supposed to be approving.	No
067/01/C12/SG1/LC/US1-3	David Loble	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3	What realistic research has been undertaken to suggest Lancaster need so many new houses? Where will the new residents work? Existing schools and health facilities will not be able to cope. The A6 is already very busy and additional journeys will increase congestion and air pollution. Flooding has always been a problem and more dwellings will only make matters worse. Not clear how a Cycling / Walking Superhighway will be created. Alternations to the M6 at Junction 33 are extremely vague and un-costed.	Suggest the Bairrig Garden Village be removed from the Local Plan until it can be demonstrated that it is viable and affordable.	No
034/01/C12/LC/US1-3	Debbie Grandjean Foord	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3	The predicted population increase appears to be flawed and unrealistic. There is a lack of infrastructure to support the Garden Village development in relation to health care and education. Development of this area will involve the destruction of wildlife and habitats. It is not clear where the residents of Bairrig Garden Village going to work. [Further detail is provided within the full response.]	The development of the Garden Village should be removed from the Plan until the areas of concern have been addresses and it can be demonstrated that it is deliverable and sufficient funding can be secured.	No
034/02/C12/LC/US1-3	Debbie Grandjean Foord	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3	Why submit over 2000 pages of additional evidence when the original plan was submitted back in May 2018. Why was the summary document not made available immediately? The documents are not written in plain english and were difficult to read electronically. Many residents will have been put off by the sheer volume of documentation and the number of rounds of consultation. The evidence provided is wholly inadequate still and does not address concerns over viability, traffic, air quality, flooding and flood risk, in conclusion my concerns about the accuracy and soundness of the Local Plan remain unchanged.	No suggested amendments made.	No
003/01/C12/NLC/US4	Deborah Murrell	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	NLC/5	US/4	The fifth bullet point of the Policy SG1 indicates that the new Garden Village should include distinct areas of separation between the Garden Village and South Lancaster and Galgate. Given the Governments requirement that Garden Villages are free standing settlements this is not consistent with national planning policy. The need for the proposal to be a free standing settlement is also not reflected on the Local Plan Policies Map.	The fifth bullet point should be strengthened, replacing the term 'should' with 'must' and the areas of separation should be defined and shown on the Local Plan Policies Map.	Yes
144/01/C12/LC/US1-4	Dr Ann Kretschmar	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	Does Lancaster really need the proposed 2,000 new homes, this area is one of the most affordable areas to live. The focus needs to be on property and job creation before homes. If this priority is successful then homes will follow. Projected job growth seems reliant on the university, there does not seem to be enough positive evidence that new jobs will be created and if so they will be for local people.  The Garden Village will require a massive amount of new infrastructure which questions whether it can be delivered on financial grounds, there is no guaranteed funding for these requirements. There are significant congestion and air quality issues on the A6 corridor and there have been no suggestions made to how these problems will be alleviated. New development will simply exacerbate problems unless realistic alternatives are provided.  This area is known to historical flood and the events of November 2017 have exacerbated that problem. The Plan fails to adequately deal with this problem and all new development in South Lancaster should be put on hold until such a time that the situation is under control. [Further detail provided in the representatives full response.]	I believe that the Garden Village should be removed from the Plan until such a time as information is publicly available to demonstrate that it is not only viable and deliverable. It is not clear what we are asking to approve at this stage.	No
150/01/C12/NLC&2&3.6/US2-4	Dr David Cox	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	NLC/2 NLC/A NLC/L	US/2 US/3 US/4	It is an unsound abomination, ill-considered and a needless and wanton destruction of greenfield sites. It will have a catastrophic effect on Galgate, threatening to turn part of this world-class village community into a dystopian Atlantis whenever the heavens open.	Remove the Garden Village proposal from the Plan.	No
058/01/C12/LC/US1-4	Dr Dina Lew	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	There is no objective evidence that there is growing housing pressure in the Lancaster area. The job forecasts are fundamentally unsound. There is a lack of information as to how flood risk will be addressed in new developers. The breathing space afforded by the current separation between Galgate and Lancaster is necessary and valuable and should not be lost in favour of risky and expensive development.	Plans for the Bairrig Garden Village should be removed from the Local Plan until such a time that properly sound proposals in terms of housing numbers, infrastructure, costs and flood risk have been provided.	No
116/01/C12/LC/US1-4	Dr Emily House	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	I am concerned that the plan, including the remodelling of Junction 33 of the M6 is being put forward as a means to address the AQMA status of Galgate. Effective AQMAs should work to address air quality issues and address contribution of traffic to climate change. It should seek to reduce traffic movements and not redirect them.  Building new road will not reduce emissions and has a negative impact on local ecology and mental health. The reconfiguration of Junction 33 is likely to worsen the AQMA issues around Lancaster and is a missed opportunity to move towards more sustainable transport such as cycling and walking. Opportunity is missing in creating a new rail station at Lancaster University.  The new employment development proposed by the Lancashire Economic Partnership seems to focus on backward looking fossil fuel intensive industries and moves toward private health and social care. These types of industries do not have a long term future. The whole driving process of the Lancashire Economic Partnership is undemocratic and means the future of the area is being dictated by short term profit with social and environmental considerations being disregarded. [Further detail provided in the representatives full response.]	A reduced and realistic figure for housing demand. More social housing Increased use of brownfield sites Low greenhouse gas emission housing No new roads Banning fossil fuelled vehicles from Lancaster A train stop near to the university. Community led creation of environmentally sound jobs on co-op principles.	No
156/01/LC/US1-3	Dr Erika Fulop	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3	The proposed requirements for new housing and the associated housing growth does not seem realistic. Where will all the employment come from and if there is not sufficient employment the Garden Village will merely be a commuter suburb. Have travel patterns investigated and the impacts on the local road network assessed? Have the plans been co-ordinated with major infrastructure providers, such as power, sewerage and drainage? Will there really be an area of separation around the Garden Village? There is no provision in the Local Plan to address issues of flood risk. Has the Council assessed how many extra car journeys will be created from new development and the impacts on congestion and air pollution? How will the Cycling and Walking Superhighway be delivered? How will the reconfiguration of Junction 33 be funded and delivered?	The Garden Village should be removed until such a time that the information is publicly available to demonstrate it is viable and affordable. It is unacceptable that it puts existing homes at greater risk of flooding and offer no clear and viable solutions to the issues posed in this representation.	No
023/01/C12/LC/US2-4	Dr Gillian Davies	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/2 US/3 US/4	The estimated demand for housing in the district is not correct and over-stated and therefore development of Bairrig Garden Village is not necessary. There has been insufficient thought given to the high costs associated with infrastructure. There is no rigorous demonstration of the employment which will be undertaken by the very large number of people estimated to be living in the Garden Village. New development will encourage greater levels of commuting and will be very destructive for the environment and health perspectives. Major infrastructure development will have a significant negative impact on the countryside and the village of Galgate. Development will not be a Garden Village simply a huge extension to Lancaster. Concerns also raised in relation to flood risk and the amount of journeys made by car.	Bairrig Garden Village should be removed from the Plan until such a time as information is publicly available to demonstrate that it is viable, deliverable and affordable and that all aspects have been considered.	No
104/01/C12/LC/US1-4	Dr Jo Carruthers	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	The plan is unsound on a number of counts, there is a lack of a 'village' element to the Garden Village, which results in merely urban sprawl, the likelihood that employment in Lancaster University will increase demand for housing in a semi-rural areas, the proposal to develop in an area susceptible to flooding which is contrary to national planning guidance which demands that planning should be prioritised in areas of low risk. [Further detail provided in the representatives full response.]  Concern raised over the use of online forms within the consultation process and the requirement to consider the soundness of the plan and legal compliance which is overly complicated and bureaucratic for members of the public.	No suggested amendments made.	No
104/02/C12/LC/US1-4	Dr Jo Carruthers	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	My objections in relation to the Garden Village proposal remain in relation to the inadequate evidence over increased employment, housing need, flood risk, traffic creation and air quality.  There has been no evidence offered in the additional evidence that such a large housing development is needed or that there will be sufficient growth in employment in Lancaster to warrant it. The absurd length of the additional evidence feels like an insult to residents who should not be expected to wade through huge swathes of material. I would concur the responses made by CLOUD.	No suggested amendments made.	No
006/01/C12/LC/US2-4	Dr John Chippendale	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/2 US/3 US/4	Central Government stated that Garden Villages should be stand alone and not be urban extensions. Bairrig Garden Village is an urban extension and was declared as such by the City Council when development in South Lancaster was first discussed. This was before the Government's Garden Village initiative.	No objection to a much reduced scheme with some expansion of the university and the development of the health innovation campus. No support for the obliteration of the area in question which has a positive landscape, pleasant woodland and scattered housing.	No
115/01/C12/LC/US1-4	Dr Naomi Parsons	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	I do not believe that the plans are economically or environmentally viable. The level of housing which have been proposed is not remotely justified. Where are all the new residents going to come from? What will happen to their old home? If new residents come from other areas where will they work? How will the existing infrastructure cope in terms of schools and healthcare? I have great concerns over the transport implications of the DPD. In South Lancaster and City Centre traffic is already a significant concern and huge levels of infrastructure will be required to address this, who will be responsible for funding this - developers, local authorities or the tax payer? The plans suggest cycling and walking provision but how will this be implemented and maintained? What consideration has been given to public transport and how would this be funded? How can such a huge amount of money be spent on unnecessary housing development while other areas of the district are suffering from high levels of poverty? The Garden Village proposals speak of protecting the local character of the area but I am struggling to see any of those principles reflected in the DPD. I also struggle to see how the Garden Village is financially viable given the huge infrastructure costs. How can we be sure that affordable housing will be delivered? There is a large number of empty properties in Lancaster already and the re-use of these should be prioritised over new development. The proposals do not include any designated areas of separation - it is not a true Garden Village as defined in national policy. I doubt believe there has been effective community involvement in the process of developing the DPD, there are many people who object to these proposals and many that are not aware of its implications. Landscape assessments have highlighted that development should not take place in this area - why are they being ignored? There is huge concern over the impacts of flood risk, particularly in light of recent flooding. New development will exacerbate these risks. [Further detail provided in the representatives full response.]	The Garden Village should be removed from the Local Plan until there is public evidence that it is economically and environmentally viable, that it is clear who will be doing what, where the funding will come from and guarantees the each part will be completed as promised with penalties if any aspect is not carried out as proposed.	No
096/01/C12/NLC3/US4	Dr Rahul Keith	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	NLC/3	US/4	Three concerns identified in relation to development surrounding the Grade II listed property at Bairrig Farm.  Bairrig Lane is recognised to be at high risk of flooding. There is no site specific detail in the DPDs on this matter to demonstrate adequate mitigation of risk to Bairrig Farm. Any development west of Bairrig Farm is likely to increase flood risk. Significant loss of farmland and the rural setting of Bairrig Farm would be at odds with the character of the area. Previous evidence prepared by Wooderton Dowdell in 2012 supports the need for a buffer zone around the property but this does not feature in the DPD. The ecological impact of development of the setting of the listed buildings have not been adequately considered. There is a registered bat roost at Bairrig Farm. As a protected species, surveys and mitigation reports are required.	Recent development in Galgate is likely to have contributed to extensive flooding in the village. Therefore evidence that further development of this land is not sound. This matter having been identified, would only be mitigated by ensuring that the land to the north, west and south of Bairrig Chase is not developed.	No

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Intend) ATTENDING EXAMINATION
037/01/C12/LC/US1-2	Dr Susan Jones	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2	The potential for 12,000 new homes proposed in the Local Plan will result in a 25% population increase - is this necessary? Where are the employment opportunities going to be created? Where would new residents be employed and have commuting patterns been considered? Will there not be significant deterioration on the local environment from increased traffic? The delivery of alternative forms of transport will not address the address these matters. The increase in population will have a huge impact on local infrastructure - health and education services. There appears to be no zone of separation between existing settlements and the Garden Village. There are significant flood risks in the area. Funding has not been secured for this development and new development would have a significant impact on the rural character of the area.	Bailrigg Garden Village should be removed from the Local Plan until the information is available to show that it is viable, deliverable and safe.	No
068/01/SG1/LC/US2	Dr Tim Dant	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/2	The proposal for Bailrigg Garden Village is not sound for the following reasons:  The population estimates are not accurate and not based on local data.  The presumption for growth is based on increased employment in the area but there is no strong evidence that such employment will be forthcoming. Employment growth is no more than a aspiration. The plan claims that there will be growth of 3,000 jobs associated with Lancaster University but there is no information what these jobs will be.  There are bland statements about the design of development but no clear statement on what it means, specifically in relation to the environmental and energy requirements of new houses.  There are vague statements about transport improvements but no explanation over how these will be delivered. The A6 is already under pressure with the effect that air quality does not meet national standards. There is a claim that a cycling / walking superhighway but no indication of how it will be delivered.  There is no mention in any documents about the impact on the landscape from the Garden Village development. There is no recognition that the local landscape will be destroyed by new development.  Although there is a claim that it will be a Garden Village it will in fact constitute urban sprawl from the southern boundary of South Lancaster. The current plan makes no attempt to identify green areas.  The plan as a whole is a failure of planning, it makes general aspirational claims without solid evidence to support the need for growth. It neither attempts to focus development or restrain it according to local needs. In the absence of poor planning, piecemeal development will mean that there will be a lack of consideration for necessary infrastructure and new residents will need to use the existing city centre, exacerbating existing congestion.	Bailrigg Garden Village should be deleted from the plan. If it is to be included in future documents then better evidence and more substantive proposals need to be made.	Yes
154/01/C12/LC/US1-3	Emily Irvine	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3	The proposed Garden Village is of an alarming scale, 3,500 new houses means around 36,000 extra residents in the area. Galgate has 2,000 residents which puts this proposal into scale. The geographical area for this development is awkwardly sandwiched between roads, canals and railway lines. It is not clear whether there will be sufficient areas of separation between new development and existing, whilst areas of separation were identified in the draft Plan these have been removed from the Publication version. If this proposal goes ahead in its current form it is likely to swallow up Galgate. New development would hardly be garden like in appearance and would be no more than a suburb.  The plan we are being asked to assess has very little in the way of detail, where will the houses be built? Where will the schools and healthcare facilities be constructed? How would these be funded? It is difficult to comment on the impact of this without such detail. There is little or no information on the impacts on the local road network, the infrastructure required and how it will be funded.  Whilst the Bay Gateway has had a positive impact on Galgate in reducing traffic and improving air quality and therefore it is not clear why a reconfigured junction would have any benefit on Galgate other than to facilitate new development. New development would exacerbate flooding issues in the area, increasing the likelihood of flood events such as that which occurred in November 2017. There is no information on how flood risk has been assessed or how it will be mitigated. [Further detail provided in the representatives full response.]	I believe that the Garden Village should be removed from the Plan until such a time as information is publicly available to demonstrate that it is viable and deliverable and the impact on the surrounding area would be minimal and properly managed.	No
172/01/SG1/LC/US1-3	Gaynor Young	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3	Objection to the Garden Village proposal, this number of houses are not needed. According to estate agents the housing market in the district is saturated and there are many affordable properties available. New development would spoil the historic and rural character of the area. Lancaster and Morecambe are tourist areas who will be deterred from visiting because of all this new development. [Further detail provided in the representatives full response.]	No suggested amendments made.	No
157/01/C12/LC/US1-4	Gill Melling	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	Crucial elements of the evidence base, infrastructure costs, air pollution assessments and transport details are aspirations. The lack of detail makes it difficult for local residents to respond. Excessive housebuilding in relation to forecasted job growth will lead to greater levels of commuting. This is contrary to Government policy. Flooding is a serious issue in this area and this has not been addressed. Air pollution is already bad along the A6 corridor and will increase. There will be damage to ecological habitats. It is not clear how infrastructure will be delivered and, due to the high costs, how it will be funded. The proposals for the Garden Village are vague and have not been sufficiently consulted upon.	The Garden Village should be removed until such a time that the information is publicly available to demonstrate it is viable and affordable. It is not clear at this stage what local people are being expected to approve.	No
117/01/C12/LC/US2-4	Gina Dowling	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/2 US/3 US/4	Flooding in the village of Galgate is not being addressed by the DPD. The Plan will cause more run-off from housing development which will exacerbate existing issues. The Council have not assessed extra car journeys that will be generated from the Garden Village, traffic congestion and pollution will worsen along the A6 corridor.	Remove the Garden Village proposal from the plan.	Yes
152/01/C12/LC/US1-3	Guy Watts	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3	The core issue for the Garden Village is the lack of consideration for the population expansion for the area. At present the Councils ambition is to achieve population growth of 12,000 new residents but the Plan does not set out any significant improvements to service provision. I do not have faith that in the long run these issues will be addressed. There is an over reliance on Lancaster University to deliver employment growth. There is insufficient information on impacts on the road network in terms of congestion and air pollution. There is no guaranteed percentage of affordable housing. The residential needs presented project an unrealistic assumption over the levels of graduate retention. There is no reference or definition of what an Area of Separation would look like. The Council does not appear to have made an impact assessment on how additional car journeys will affect local congestion. The Cycling and Walking Superhighway is not specified in the Plan. Has an impact assessment been made into the water run-off which will affect Otu Beck? The reconfiguration of Junction 33 is not substantiated or how funding will be secured. What levels of private sector investment will be expected? How will extra school places will delivered and how will healthcare demand catered for? [Further detail provided in the representatives full response.]	No suggested amendment made.	No
094/01/C12/LC/US1-4	Helen Wilkinson	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	I consider the DPD to be unsound on a number of counts. The plans are not positively preared and do not appear to be objectively assessed. The figures which have been used as a base for calculations are not realistic in terms of calculating housing need and demand and therefore the need for a Garden Village is overstated. There is no new commercial investment in Lancaster to provide new employment opportunities for such a large number of people. Growth to this scale will create a commuter zone. Although there is a statement that the Health Innovation Campus will generate 2,000 additional jobs there is no evidence to justify this. There are already a lot of empty houses in Lancaster and this is due to the increasing number of student blocks in the City. The average number of houses built over the past 10 years has been 250 houses, the plan states that 522 houses per year will be built yet there is no explanation why this is the case and where the demand will come from. The main reason the plan is unsound is the proposed location of the Garden Village, the requirement for infrastructure to cross the West Coast Mainline and other road systems are very expensive and therefore the costs for the Garden Village will be much higher. It would seem more justifiable to build elsewhere where infrastructure costs are lower. There is a lack of developer interest in bringing the area forward and the Government cannot justify this unnecessary spending on infrastructure when other priorities exist, therefore it is not a effective use of public funds.  Proposals for the Garden Village have not been presented in a sound manner and local residents have not been properly informed about matters such as infrastructure and areas of separation. In conclusion I understand the need for new housing but I believe Lancaster does not need the volume of housing proposed for Bailrigg Garden Village. There are alternative, more affordable locations in this area. [Further detail provided in the representatives full response.]	To review the figures and numbers to develop a more accurate demand for housing in this area. This look at the other planning proposals and break up needs into smaller areas, thereby preventing urban sprawl.	No
061/01/C12/LC/US1&2&4	Helena Dixon	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/4	Objection to the Bailrigg Garden Village proposal. What is the plan for flood management in light of recent flooding events in Galgate / Elbe? The projections for homes required are disproportionate to actual demand. The 2015 Turley report demonstrates inflated figures for growth compared to the Census. Properties for sale / rent in Lancaster are very slow moving - where is the evidence of demand? Where will the jobs come from for the residents of the Garden Village? There has been a steady decline in job opportunities alongside a decline in the retail sector. I suggest that the proposal for Bailrigg Garden Village exceeds the basic premise for a Garden village because of the proposed infrastructure costs associated with it. These far exceed other proposals from across the country. The Area of Separation has been completed removed from the plan which suggests urban sprawl of Lancaster rather than a Garden Village.  Further supplementary information provided which also raises the following issues: The time scale for consultation was very short and poorly advertised allowing people inadequate time to learn about the proposals and respond. The Local Plan is not complete and extremely vague. Development would lead to the loss of a Greenfield site. The proposal does not meet the Government's requirements for a Garden Village. There are historical remains on the site The increase in road and traffic movements will increase levels of pollution. Brownfield sites should be used to develop housing for permanent residents, not student accommodation. [Further detail provided in the representatives full response.]	Bailrigg Garden Village should be removed from the Local Plan until there is information available to the public which demonstrates it is viable and affordable.	No
140/01/C12/LC/US1-4	John Harris	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	It is proposed that 3,500 houses will be built in the Garden Village, homeowners will require jobs but apart from the Health Innovation Campus there is no mention of where people will work. If people do not work locally then they will use their cars to commute further afield. These journeys will create air pollution and congestion which will continue to affect Galgate. It is difficult to know whether the jobs proposed for the Innovation Campus will actually be created with most of the jobs transferred from the existing campus.  Lancaster needs affordable housing, however developers are unlikely to build the affordable housing needed if they are to make sufficient profits. Developers build larger houses so they can make more profit rather than built the smaller homes which are in short supply. Lancaster's road network is already congested in locations such as the Pointer Roundabout, Hals Road / Scoforth Road junction and Ashford Road. There is little in the way of separation between pedestrians and cars. Additional development will generate more car movements which will increase congestion and air pollution. Further detail is provided in the full response on the highway implications at Pointer Roundabout and within the Lancaster Gyroatory System. Lancaster already suffers from poor air quality with AQMAs in Lancaster, Carnforth and Galgate. Building more houses will simply exacerbate these pollution issues further. There is a lack of retail activity in South Lancaster, particularly food shopping which again will generate significant numbers of vehicle trips across the City.  There have been significant flood events in the locality, most recent in November 2017. There is no explanation over how flood mitigation measures will be achieved or where attenuation ponds will be located. No explanation is offered about site drainage or where sewerage will be processed. [Further detail provided in the representatives full response.]	The Council has produced documents which are strong in aspiration without providing any of the necessary detail that is required to truly evaluate the proposed Garden Village, which in any case fails the Government requirement that it must be a new discrete settlement and not an extension of an existing town or village.	No
041/01/C12/LC/US1-3	John Kenyon	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3	Does Lancaster need 12,000 new homes, is the population increase realistic? The infrastructure costs would surely impact on house prices and the delivery of affordable housing? How are additional schooling and health provision to be provided? Where are all the jobs going to come from? No coherent plan is available for the transport systems to be introduced. The Garden Village includes land which has been subject to serious flooding over recent years. There is no information in relation to drainage, gas and power and internet. [Further detail provided in the representatives full response.]	I am being asked to comment on the Local Plan, in particular the Garden Village, without the necessary information on its viability, deliverability and affordability which I consider to be unreasonable. The Bailrigg Garden Village proposal should be removed from the Plan until such a time that all relevant information is available publicly.	No
046/01/C12/LC/US1-2	Joyce Pollard	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2	Concerns over the logistics of building the Garden Village, the plan lacks detail on this matter. There will be a huge expense of building a newly reconfigured junction 33 - given the costs of infrastructure how will the houses be affordable? How will all the infrastructure required be funded? What is the plan for local roads and public transport? Does Lancaster really need so many new homes - where is the proof? Whilst not against development per se I do not think the plans are as yet properly prepared.	Bailrigg Garden Village should be removed from the Local Plan until the information is available to show that it is viable, deliverable and affordable. The scale of new housing should be reviewed.	Yes
027/01/C12/LC/US1-3	Judith Colley	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3	Objection raised to the allocation of Bailrigg Garden Village on the following grounds:  The proposal does not meet the definition of what is considered to be a Garden Village and is not a discreet settlement. It is an extension of Lancaster. The housing and employment projections are not realistic and do not use ONS statistics. New development in this location will increase levels of commuting to employment outside of the district. Whilst close to the Health Innovation Campus and University it is divorced from employment on the Heysham Peninsula. Development in this area will place great pressure on the need to use private vehicles. The high costs to the additional infrastructure required will make Bailrigg Garden Village an expensive place to build and will deter developers and reduce the levels of affordable housing that can be provided. The true cost of infrastructure is yet to be assessed. The scale of development proposed will place pressures on the local health infrastructure. Bailrigg Garden Village is not appropriate in terms of ensuring that the quality of our natural and built environment is conserved and enhanced. New development will damage natural habitats and species. There are flooding issues around Otu Beck and Burrow Beck where flooding occurred in 2015 and 2017 which will be exacerbated through new development. [Further detail is provided within the representative's full response].	Bailrigg Garden Village should be removed from the Plan until such a time as information is publicly available to demonstrate that it is viable, deliverable and affordable and that all aspects have been considered.	No
027/02/SG1/NLC2&5&6/US2&4	Judith Colley	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	NLC/2 NLC/5 NLC/6	US/2 US/4	Objections to Bailrigg Garden Village remain.  The latest evidence consulted on has not been written in plain english which is accessible to local communities, to avoid them being disengaged in the process. Although the additional evidence has been summarised, the summary was delayed for a week by which time I had been overaced by the prospect of reading 2,000 pages and no longer has an interest in yet another set of evidence being submitted by the City Council.	No suggested amendments made.	No
090/01/C12/LC/US1-4	June Constantine	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	There has been a lack of information about the Garden Village through previous consultation on the Plan and the same is apparent at the Publication Stage. There is a lack of hard factual detail. Where will the houses be? How many will be affordable? Where will the schools and health centres be located? What will the Bus Rapid Transit System look like? Where will the Transport Hub be? The Council acknowledge that more work will be required which will take far in advance of the Public Examination to provide.  There is an absence from the plan in relation to how the Garden Village will connect to the surrounding highway network. It is likely that 3,500 homes will mean about an extra 5,000 cars. Whilst some new residents will chose sustainable forms of transport it is likely that many will use private cars. The Plan fails to consider the consequences of this through any assessment of potential congestion and air pollution.  There are ground to fear that the M6 to the east of Galgate will make the village even more vulnerable to flooding. There have been significant flooding events which have affected Galgate, most recently in November 2017. Flood action groups have been formed and are being advised by the EA. The plan acknowledges the risks of flooding posed to the Garden Village and highlights measures to mitigate the risk (not prevent the floods). But the Plan fails to mention that the construction of the reconfigured junction which must cross the flood plain of the River Conder which will surely exacerbate flood risks. The Plan is absent on how these risks will be addressed. [Further detail provided in the representatives full response.]	To make the Garden Village sound would require major modifications and the professional expertise of qualified persons. The Local Plan should be again subject to public consultation and Council Review.	No

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Intert) ATTENDING EXAMINATION
082/02/C12/NLC3&5/US1&2&4	Katrina Barnish	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	NLC/3 NLC/5	US/1 US/2 US/3 US/4	<p>The whole plan looks like a clear example of urban sprawl, the plan includes a reconfiguration of Junction 33 which make this area of development into a commuter area which could lead to a dormitory suburb. Consideration should be given to the levels of development which is already underway south of Junction 33 and Central Preston, I feel this is very important before we end up in a situation where there will be little separation between Lancaster and Preston.</p> <p>It may be that most new residents of the Garden Village will find work, or already have employment in Lancaster, however this cannot be guaranteed within the immediate area. There is a strong likelihood that there will be increased congestion on the A6 corridor into Lancaster City Centre. The plans put a strong emphasis on cycling and walking which is a good aspiration but not realistic.</p> <p>The proposed development has many further issues including flooding which has become a real issue for the area. Whilst I recognise there is some likely need for housing in the overall area I do not feel the current plan is justified and the solutions put forward by the Council will alleviate the problems. [Further detail provided in the representatives full response.]</p>	Bairrigg Garden Village should be planned on a much smaller scale or removed from the plan.	No
082/02/C12/NLC3&5/US1&2&4	Katrina Barnish	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	NLC/2	US/1 US/3 US/4	<p>Objection to Bairrig Garden Village is maintained, the additional evidence has not demonstrated a sufficient housing need for such growth and concerns remain in relation to traffic and transportation, air quality and flood risk. The landscape assessments summarise the negative impact on existing property within the boundaries of the Garden Village. [Further detail provided in the representatives full response.]</p>	Bairrig Garden Village should be planned on a much smaller scale or removed from the plan.	No
024/01/C12/LC/US1-4	Kieran Cooke	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	<p>There is in-sufficient housing need in the district to merit the requirement for 12,000 new homes in the Plan. This requirement is totally unrealistic. Development of this scale will place incredible pressure on local infrastructure, the plan does not articulate how this demand will be met. There are no enough jobs to support the growth of housing to this scale. There has been little though or co-ordination with infrastructure providers over these plans. The proposed Garden Village is at high risk of flooding and flooded in the winter of 2017/18, this has not been taken into account.</p>	<p>Bairrig Garden Village should be removed from the Plan until such a time as information is publicly available to demonstrate that it is viable, deliverable and affordable and that all aspects have been considered.</p> <p>It does not make sense that local residents are being asked to approve (or not) by 6 April. While work on a specific DPD has started this will not be ready for some time therefore it is not clear what local residents or the Inspector are to approve.</p>	No
136/01/C12/LC/US1-3	Linda Warrington	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3	<p>No provision has been made in the Local Plan to address the major flooding incident which took place in November 2017, recent housing development has made flooding worse.</p> <p>This level of need for new homes is over estimated, 12,000 new homes are proposed which will generate significant increases in population.</p>	The Garden Village should not be included in the plan until flood risk has been assessed. Revise the levels of housing need and public services required.	No
143/01/C12/LC/US1-4	Lisa Corkerry	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	<p>I am not convinced that Lancaster needs an additional 12,000 new homes and the consequential population growth is realistic. Where are these new residents going to work? What opportunities are available for the 24,000 new jobs that will be necessary? If it is expected that people will commute then where will they be commuting from and what impacts will this have on the local traffic network?</p> <p>Given the high infrastructure costs associated with the Garden Village is it affordable and how will these costs impact on the cost of housing? How can we be sure that affordable housing will actually be developed? How can we ensure there will be adequate capacity in local health services? How will additional school places be funded?</p> <p>There is no evidence that the flood risk of the area has been taken account and that the events of 2017 will not be repeated or exacerbated. How will the Cycling and Walking Superhighway be constructed and where will it go? How will the Garden be separated from Galgate and South Lancaster? The traffic increases associated with new development will be unendurable unless Junction 33 is reconfigured first but what funding has been secured?</p>	In view of the comments I have made I would suggest that the Garden Village is removed from the Plan until such a time that information is publicly available to demonstrate that it is viable, deliverable and affordable.	No
072/01/C12/NLC3/US2	Maggie Wild	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	NLC/3	US/2	<p>The Plan describes Green Belt around the development but the map does not provide areas of separation and implies development will fill the space between Galgate and Lancaster. Galgate suffers from considerable traffic congestion and the air quality levels are higher than acceptable, additional development will exacerbate this issue. Galgate has suffered recent devastating flooding events and I fail to see how building upstream will do anything but exacerbate this problem, there is a lack of information on how flood matters will be addressed. Whilst a modal shift to more sustainable forms of transport is positive it takes much more to shift habits than merely providing infrastructure.</p> <p>Population growth is highly predicated on student numbers in Lancaster which have specific housing needs and should not be accounted for in relation to delivering local housing needs. Whilst not against new housing, the proposal for the Garden Village is too large and would have too many detrimental impacts.</p>	<p>I would wish for the Green Belt, flood mitigation, air quality, traffic management and sustainable travel aspects to be prioritised and addressed in detail.</p> <p>I think that the Garden Village proposal should be removed from the Local Plan. I would be interested to review a future proposal which is supported by information that the public can access which provides evidence that the plan is viable, affordable and addresses the environmental and practical concerns outlined in this representation.</p>	No
099/01/C12/LC/US1-3	Margaret Linthwaite	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3	<p>The area of separation between the Garden Village and Galgate has been removed from the Publication Version of the Plan. November 2017 saw serious flooding in Galgate and building more houses will only exacerbate this problem. The local road network is already congested and will increase further from new development and will also have an effect on air pollution. The Bus Rapid Transit System proposal will adversely affect normal bus services used by local people. How will Lancaster cope with the influx of new people in terms of local infrastructure - schools, healthcare and roads.</p>	No suggested amendments made.	No
071/01/C12/LC/US2	Marion McClintock	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/2	<p>I wish to draw attention to the submission by CLOUD regarding the Garden Village proposal and endorse their methodology and conclusions. Issues around flooding and traffic flows are of particular concern. The whole southern flank of Lancaster, engulfing Galgate and extending east of the M6 will be effectively used and lack services that exist in the city centre.</p>	<p>The assessment of flood risk should be re-investigated in light of the flood events in 2015 and 2017.</p> <p>The proposed traffic interventions should be halted whilst less dramatic intrusions into the landscape are investigated that are more sympathetic to the local character of the area.</p> <p>Clear areas of open space should be retained between the city's southern edge and new development and Galgate be maintained as a manageable community that is self contained, again with open spaces around it.</p>	No
022/01/C12/LC/US1-4	Mark Hammond	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	<p>Does Lancaster need extra housing? Are the population increases realistic? What will the houses cost? How will new infrastructure be funded? Where will people work? How has new infrastructure been co-ordinated? How will the area of separation be created around the village? How will matters of flood risk be addressed? Have impacts on the local road network been considered?</p>	Bairrig Garden Village should be removed from the Plan until such a time as information is publicly available to demonstrate that it is viable, deliverable and affordable and that all aspects have been considered.	No
073/03/C12/LC/US2-4	Mary Breakell	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	<p>My main concern lies with the impact of Bairrig Garden Village, the Health Innovation Campus and motorway reconfiguration on flooding in Galgate. There is no evidence in the Local Plan that they will not add to flood risk.</p> <p>The Garden Village involves significantly expensive infrastructure even to make the area accessible, there is no information on the associated costs and detail of this infrastructure. Has the route been surveyed? What is Network Rail's view on this proposal? What is the cost of bridging the canal? What justification is there for infrastructure given the close proximity of the Bay Gateway which has only recently opened? How does the infrastructure costs affect the cost of housing?</p> <p>Galgate traffic congestion and air quality is an ongoing problem which would be exacerbated by extra traffic, particularly if residents are commuting to and from the Garden Village. There is insufficient detail on the Cycling and Walking Superhighway? How has air quality along the A6 corridor been assessed?</p>	<p>It is not possible to have an informed view on the Garden Village because so little information has been provided. Given this represents such a large element of the Local Plan I believe it should be withdrawn until full evidence of costs and implications are available.</p>	No
073/04/C12/NLC2&NLC5/US1	Mary Breakell	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	NLC/2 NLC/5	US/1	<p>The additional evidence consulted upon has not addresses previous concerns raised in relation to transport and infrastructure.</p> <p>The consultation process this time has been confusing and difficult for members of the public to engage with. The level of documentation produced was indigestible and it was over a week before they were organised with a response.</p>	No suggested amendments made.	No
039/01/C12/LC/US1&5.2&3&4	Meriel Lolley	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/1.5-2 US/3 US/4	<p>The plan is unsound as there is no obvious demand for new housing. Where are the realistic opportunities for new employment in Lancaster? Rental opportunities are contracting not expanding. There is little information on the delivery of new infrastructure - for example local schools. Extra traffic will place huge pressure on the A6 into Lancaster. Health providers including the Hospital and GPs would need to increase capacity - who funds this? There does not appear to be any separation between the Garden Village and Scottforth / Galgate. There have been significant floods locally, who plans to avoid future floods? The A6 is already dangerous for cyclists and pedestrians - would a cycling superhighway be safe?</p>	Bairrig Garden Village should be removed from the Local Plan until there is more information and studies taken to support the proposal. At present it is not viable, deliverable or affordable.	No
102/01/C12/SG1/LC/US1-4	Michael Fidler	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	<p>There is a lack of information and evidence about how the increase in new residential will be supported by health facilities, education and employment. There are no specific plans in place to address flood risk. The delivery of new infrastructure, particularly Junction 33 will be costly. Where is all the money from? The Cycling and Walking Superhighway is dubious - where will it be located? How far will it extend? The area of separation is not acceptable and does nothing to separate new development from Galgate. No thought has been given to provide sufficient wildlife corridors or habitats.</p>	Due to the lack of detail, it would seem that this part of the plan needs serious reconsideration. The planning process has been far too rapid for such a large development, the proposal needs to be halted, rethought before further public consultation.	No
069/01/C12/LC/US1-3	Olivia Wilson	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3	<p>I believe the scale of development at the Garden Village is unwarranted and completely out of proportion for demand in the Lancaster area. There are no major employment opportunities planned in South Lancaster to justify this level of building. The cost of the infrastructure for any building to be undertaken is ridiculous as the site is cut off from the West Coast Mainline. There is no traffic congestion in South Lancaster since the Bay Gateway opened and the proposed changes to Junction 33 are completely unwarranted. As landowners in the proposed Garden Village, we have no intention of selling our land for housing development which presents a significant obstacle to the proposed implementation of the plan.</p>	No suggested amendments made.	No
130/01/C12/LC/US1-4	Patricia Jackson	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	<p>The plan is not sound as it has failed to consider the infrastructure needed to support such a large development, this will prove to be at a huge environmental cost to the local landscape. Significant infrastructure will be necessary which will be at a high cost.</p> <p>There are no designated areas of separation between new development and Galgate. Is there a valid reason to support the need for 12,000 homes as proposed in the Local Plan? Can the population growth be realistic given all the extra services which would be required?</p> <p>Has there been any thought of where the work and jobs will come from to support the people who will live in the Garden Village? It is likely that it will merely be a commuter suburb which will generate more congestion, pollution and car dependency.</p>	<p>I suggest that Bairrig Garden Village is removed from the plan until it is demonstrated via public consultation that it is viable and affordable proposal. The Garden Village has been pushed through far too quickly without enough public consultation and is very vague. Why has such an expensive and inaccessible location been selected to build the Garden Village and other locations should be considered.</p>	No
060/01/C12/LC/US1&3	Patricia Waters	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/3	<p>I am concerned that not enough provision has been made to provide adequate public services for the increase in Lancaster proposed population, particularly in relation to education and healthcare. How will new infrastructure be funded? What will be done to ensure healthcare services can cope? Has the Council assessed the environmental impact on the City? Does it know how many extra car journeys will be made as a consequence of the Garden Village? How ill this affect air quality and traffic congestion? The funding for the Garden Village is not secured - who will be responsible for paying the funding gap?</p>	The Garden Village should be removed from the Local Plan until such a time information is publicly available to show it is viable, deliverable and affordable.	No
032/01/C12/LC/US2	Paul Grimes	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/2	<p>Lancaster neither needs nor has the infrastructure to support the delivery of 3,500 new homes at Bairrig Garden Village nor the delivery of 12,000 new homes district wide. The huge increase in population is not justified within the DPD. There is little or no discussion over how services will be expanded to cope with demand. The residents of the proposed Garden Village will require jobs and the DPD does not provide sufficient detail on where employment will be created. The DPD does not sufficiently address the implications of commuting. [Further detail provided in the representatives full response.]</p>	The Garden Village proposal should be removed from the plan until further work has been completed to allow it to be fair judged as viable, deliverable and affordable.	No
142/01/C12/LC/US1-4	Peter Quick	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	<p>My fundamental objection to the proposal is for a major housing project (Bairrig Garden Village) in a tightly constrained location. This can only be made to work if there is a reconfiguration of Junction 33, numerous crossings of the West Coast Mainline, bridging of the Lancaster Canal and the provision of flood relief in Galgate. The total costs for this are not justifiable or sound in the current economic conditions, particularly when the need for extensive new housing is unproven.</p>	Delete the Bairrig Garden proposal as it is flawed.	Yes
114/01/C12/LC/US1-3	Philip Ternouth	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3	<p>The Local Planning Authority has by its own admission not carried out detailed analysis or provided objective evidence to ensure the development of the Bairrig Garden Village can be accommodated at the proposed scale without causing substantial increase in traffic congestion and air pollution. It has not analysed the number of journeys which will be generated, the impact on the existing road network and how these impacts and increased in demand will be accommodated.</p>	The Garden Village proposal should be removed until such analysis has been carried out and been subject to public scrutiny.	No
045/01/C12/LC/US1-4	Professor Malcolm Quinton	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	<p>The DPD has a lack of hard information, evidence, detail and modelling. Too much is assertive and aspirational. Important questions are not answered such as whether the Garden Village is viable and deliverable considering the expensive infrastructure costs? Have plans been co-ordinated with major infrastructure providers? Will funding cover all the infrastructure costs associated with development? Has there been assessment to the increase in traffic arising from development? Where will all the jobs come from for the residents of the Garden village? What proportion of new builds will be social and affordable housing? How will the matters of flood risk be addressed given the significant flood events which have occurred recently? [Further detail provided in the representatives full response.]</p>	Bairrig Garden Village should be removed from the Local Plan until the information is available to show that it is viable, deliverable and affordable. It is premature for the public to be asked to comment on the document.	No
057/01/C12/LC/US2	Professor Peter Lea	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/2	<p>The delivery of 3,500 new homes at Bairrig Garden Village is not sound. It is not clear how the evidenced housing need has been derived at (it is assumed the Turley work of 2015 and 2018). It is relatively easy to provide evidence of what happened in the past but impossible to predict the future, particularly up to 2031. The evidence on housing growth is weak and relates to Lancaster district as a whole and not Bairrig Garden Village. House prices in Lancaster district are low compared to other areas so the Council's evidenced need for housing is not justified.</p> <p>Global impacts on the university may effect future growth in student numbers which may in turn affect growth. There has been a large amount of development in the City Centre for purpose built student housing which will, in turn, free up family housing in South Lancaster. If there is a decrease in student numbers for any reason, this will increase the supply of housing even further and reduce that evidence need even more.</p> <p>Employment growth assumptions are overly optimistic, even if 2,000 jobs at the Innovation Campus proves correct, then at least 5,000 jobs will be needed to pay the mortgages of the new houses at the Garden Village. I find it hard to believe this many jobs will be created in the district. The remaining residents will have to commute out of the Garden Village for work. Has the Council assessed how many extra car journeys will be created by new development? There are also matters of flood risk within the locality which new development would exacerbate. [Further detail provided in the representatives full response.]</p>	<p>The Garden Village proposal should be taken out of the plan until such a time it becomes clear that sufficient jobs are available in the innovation campus, or other areas of South Lancaster. In addition, the risk of flood must be greatly reduced and pollution from car travel on the A6 brought to a low level.</p>	No
057/02/C12/LC/US2&3	Professor Peter Lea	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/2 US/3	<p>I repeat my original objection that I consider that the plan of the construction of Bairrig Garden Village is not sound. It is not justified and it is not based on proportionate, robust and credible evidence. Very little has changed since my previous comments of April 2018. I still do not believe there is a need for 3,500 new houses and that there will be 10,500 new jobs that will support the families in these houses. The university needs to make clear that they have sufficient funds to cover the costs of these new jobs.</p>	The only way to make the Plan sound is to greatly reduce the number of houses that are planned for construction.	No
101/01/C12/LC/US1-4	Rachel Bindless	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	<p>Where will the run off from new development go? The area proposed for development is an area which is subject to regular flooding which was subject to flooding in November 2017. New development has already exacerbated the flood risks for Galgate and new development will increase the issue further. The solutions to flooding given in the plan are vague and need to be specifically outlined.</p> <p>The Plan states that the Garden Village and Health Innovation Campus will create new employment opportunities. However, there are no assurances that these jobs will be for local people or residents of a future Garden Village. There has been little assurance of how much of this development will be for affordable housing. There is much uncertainty over the housing supply and demand figures in the locality. Some landowners in the proposed Garden Village do not want to sell their land for development, if they are forced to sell (or are simply built around) this is surely not working hand in hand with local communities. There has been insufficient work undertaken on viability. The public have not been offered any concrete plans which show that the proposal is viable in terms of traffic and infrastructure. Considering the very significant and expensive road reconfigurations there are many choices more suitable than Bairrig which would rule over the need for new road construction. The traffic in and around Lancaster and Galgate is already congested, there is no clear plan to how this will be alleviated. The proposed areas of separation are totally inadequate, Galgate is a small village and the proposed development will result in the loss of village identity. At present the proposed buffer zone does nothing to maintain Galgate's distinct character. This large developer is not to the benefit of the environment and will result in the significant loss of natural habitat and wildlife. There are no specific plans for the allocation of allotments, green spaces woodlands etc. [Further detail provided in the representatives full response.]</p>	Considering the unacceptable levels of ambiguity in the Plan and the lack of assurance provided to local communities, the proposal for the Garden Village should be removed until it is demonstrated that development would be affordable, beneficial and technologically viable. Further public consultation should take place on the Garden Village in able for the public to make informed decisions on the matter.	No

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Insert) ATTENDING EXAMINATION
095/03/C12/LC/US2-3	Ralph Prior	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/2 US/3	There is potentially high infrastructure costs associated with the Garden Village though few have been addressed within the Plan. Priority should be given to the regeneration of Moreambe which is also well located to the Heytham Gateway. Public funding should not be used to fund the reconfiguration of Junction 33. There has been no assessment of impact and implications on the local road network. The Plan is vague in relation to healthcare facilities and how extra demand will be addressed.	It is difficult to suggest modifications to the Plan when so little information about the Garden Village is available. Until evidence is supplied which demonstrates precisely what is involved, how much it will cost and how the demand for infrastructure is addressed then I suggest withdrawing the Garden Village from the Plan.	No
056/01/C12/SG1/LC/US1-3	Robert Ogden	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3	I am opposed to the Bairrig Garden Village, in the long term the Garden Village will provide housing for 12,00 people. However, long term employment provision by the university is only 1,000 jobs at full capacity. This is a shortfall in employment cannot be made up via private or public sector. It is likely to make the Garden Village a commuter suburb and increase traffic on local road networks. The Local Plan has not considered this in its poor and hastily assembled analysis. The Garden Village also threatens the rural integrity of the university. There has been a lack of assessment on congestion and air quality / pollution, there is no guaranteed percentage of affordable housing, there are no guaranteed areas of separation, there are no ecological or flood impact assessment, there is too much reliance on the delivery of expensive infrastructure	No suggested amendments made.	No
065/01/C12/LC/US2-3	Rod Leaman	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/2 US/3	I do not believe that 12,000 new homes are necessary, population growth of this scale would require a rapidly developing industrial and commercial sector to sustain such growth. Add the uncertainty of Brexit, increases in interest rates, pollution from more road and the loss of countryside should be considered.	The Garden Village should be removed from the Local Plan until such a time information is publicly available to show it is viable, deliverable and affordable. It is premature to be making comments on this proposal without sufficient detail.	No
052/01/C12/LC/US1-4	Rosie Morgan	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	I feel the plan is unsound and not positively prepared in regard to Bairrig Garden Village. The current housing need figures are questionable, house prices in Lancaster are currently stable suggesting there is not a shortage. The projected job growth figures are not realistic. There is inadequate information on all key areas of the proposal, no information on the types of housing, impacts on the local road network, costings for infrastructure - particularly details about the reconfiguration of Junction 33. Air Quality is not considered, loss of countryside is not considered, the area of separation is being gradually eroded. Much of the detail is not completed therefore it is premature to be asked to comment at this stage.	Bairrig Garden Village should be removed from the plan until further research is carried out as to whether it is actually needed and if so whether it is viable and deliverable.	No
083/01/C12/LC/US2-3	Sally Ford	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/2 US/3	It is unclear as to whether there will be a real area of separation around the Garden Village, the proposal map does not seek to indicate any separation. There have been significant flooding issues in Galgate in 2015 and new development will exacerbate these problems. Has the Council researched how many extra car journeys will be created from the Garden Village? Congestion and air pollution is already an issue and the Garden Village is likely to increase these issues. There is little information on how a Cycling / Walking Superhighway will be created and delivered. There is little detail on what is meant by the reconfiguration of Junction 33. There is a funding bid made but funding is not secured, the amount needed is large and suggests a substantial amount of private sector contributions will be needed.  There is no evidence that Lancaster needs the amount of new homes proposed and population projections are unrealistic. How would the high number of new homes impact on local house prices? It is not clear how additional school places will be funded and there is no reference to improved health facilities.  Where will the new residents of the Garden Village be employed? There are no guarantees that this will be in the local area so will increase journeys on the local road network. There is no information as to whether local infrastructure providers (eg sewerage, power and drainage) will be coordinated in the plans.	The Garden Village proposal should be removed from the plan until further work has been completed to allow it to be fair judged as viable, deliverable and affordable. It is premature to be making comments on the Garden Village proposal given the completion of the detailed DPD will only be finalised in 2020. Given these timescales it is very unclear as to what that public are supposed to be approving.	No
137/01/C12/LC/5	Sandra Makinson	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	5	I am against the number of houses and properties planned for this area. The A6 is a very busy road and is heavily congested at peak times. The construction of the new innovation campus is already causing many problems on the road network. There are not sufficient bus stops for the people of Scotland. New development should provide gardens and parks and better shops are needed in Lancaster City Centre.	No suggested amendments made.	No
079/01/C12/LC/US1-4	Sara Bundy	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	The most recent proposals for development no longer constitutes a self-contained Garden Village and does not adhere to the principles of a Garden Village. It joins the South of Lancaster and continues without any break to join the village of Galgate. This area cannot have an identity. The requirement for new homes were produced by Turleys, prior to Brexit, and are now considered to be flawed and outdated. We already have more than 1,000 empty homes in the area. The population increases proposed are not realistic. The provision of affordable housing will not apply to the Garden Village due to high infrastructure costs which reduces profitability for the builders.  The DPD is not sound in consideration of transport systems and the movement of people and vehicles. Modal shift towards bus journeys, cycling and walking will not be achieved. Traffic is already seriously congested on the A6 and the network is already beyond capacity and further development will exacerbate this issue. It will increase congestion further and levels of pollution.  Much of the Garden Village will be built on farmland which provides drainage for rivers and beck. Serious flooding occurred in 2017 some of which can be attributed to lack of drainage management within newly built developments in and around Lancaster and new road systems such as the Bay Gateway. Building on flood plains, as proposed by the Garden Village such as along Burrow Beck, Ou Beck and River Conder is going to have serious adverse impact on land which already floods.  There is already huge pressure on Lancaster GP services, hospital and education services. There is considerable unemployment and this is likely to increase unless the Garden Village becomes a commuter suburb. [Further detail provided in the representatives full response.]	Currently the plans for Bairrig Garden Village are aspirational ideas without substance. It is premature to ask for comments from the public on this matter without insufficient information. Until such a time that there is evidence of the viability, deliverability and affordability of the Garden Village it should be removed from the Local Plan.	No
031/01/C12/LC/US1-4	Scott Colley	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	The DPD has not been well prepared and based on flawed evidence and an over-estimation of housing need and population growth. Given the ageing population and the need for city based social housing the Garden Village appears unjustifiable. There is a absence of information relating to the projects nature, scale, environmental impact and traffic levels. How is the proposed infrastructure going to be funded? With regard to national policy the DPD fails as it does not prioritise brownfield sites, pollution levels would dramatically escalate, there is no evidence that the Garden Village will be sustainable or boost economic growth and there is no provision for affordable housing.	Priority should be given to the development of brownfield sites, such as the Canal Corridor to meet future development needs.	No
132/01/C12/LC/US1-4	Shaun Corkerry	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	Objections are raised to the proposal for Bairrig Garden Village. I believe that the Council have not proposed any alternatives for such development in the district and have not sufficient taken advantage of the recently opened Bay Gateway. The time scale for consultation was limited and left little time for consideration.  I remain unconvinced that sufficient buffer zone will be planned between the Garden Village and Galgate and therefore development will merely be an urban extension of Lancaster. The area under consideration is very close to the A6NS and development will ruin large areas of greenfield land. Within the Garden Village there are extensive archaeological remains from the Bronze Age and Roman era and I remain unconvinced that any form of significant research has been undertaken to assess their importance.  There is no detailed information on the proposed reconfiguration of Junction 33 nor any assessment of impact on traffic flows from new development on the local traffic network. I remain unconvinced that the relevant environmental impact assessments have been carried out. New development in these areas will remove permeable surfaces and will affect surface water drainage in the Galgate area, which is already significantly affected.  I remain unconvinced by the need for a Garden Village, I do not believe there are sufficient jobs to sustain the number of houses proposed. Employment and infrastructure should come before houses. I remain unconvinced that there is sufficient infrastructure existing or will be planned to meet future needs. [Further detail provided in the representatives full response.]	Bairrig Garden Village should be removed from the Local Plan until such a time that information is publically available to demonstrate that it is viable, deliverable and affordable. Does Lancaster need 12,000 new homes?	No
047/01/C12/LC/US18.3&4	Stephen Booth	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/3 US/4	Objection raised to the proposal for Bairrig Garden Village which will harm the village of Galgate and the insufficient allowance has been taken for the fact that the water courses in this area (Ou Beck / Shearsett Beck, the River Conder and Whitley Beck are presently up to capacity and can take no more run-off. Given the recent flooding events in Galgate no more large scale development should take place near to Galgate. [Further detail provided in the representatives full response.]	Bairrig Garden Village and the University Science Park should be removed from the Local Plan.	No
035/01/C12/NLC2/US2-3	Susan Parkinson	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	NLC/2	US/2 US/3	The Local Plan suggests a need for 13,000 new homes but does not provide information on where the jobs will come from to account for this growth. Such an increase in population needs additional services and little / no information has been given on this matter. The areas of separation are minimal and results in merely an urban extension of Lancaster which would swamp Galgate. New development will exacerbate local flooding issues and traffic movements.	The Garden Village should be stopped until it is proven to be viable. The quantity of housing should be reconsidered in light of employment availability.	No
184/01/C12/LC/US1-2	T.McMinnis	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2	Detailed submission which sets out how the current Local Plan should be modified and updated to ensure that the City of Lancaster is not damaged irreparably following its lack of imagination, short termism and opportunistic cobbling together of old and failed land allocations to the south of the city.  At its heart it is argued that the Local Plan predates the Garden Village and national infrastructure monies and as such does not take into account the new possibilities that can now be pursued to completely unlock the long-term problems that remain in developing the south side of the City. As such it is inadequate as a 'Strategic' Local Plan as it fails to deliver sustainable and enduring development potential for the next 25 years and beyond.  If this Local Plan were implemented and the new Garden Village as proposed were to go ahead with reduced infrastructure it would immediately and permanently end all future potential developer to the south of the City by not addressing the problems of breaking out of the triple blockages caused by road, rail and canal.  The local plan does not have a vision for this city, it is simply a gathering of unconnected tactical possibility given no long term capability to its long term usefulness. The Local Plan has failed to take account of the completion of the Bay Gateway. [Further detail provided in the representatives full response.]	The Local Plan should be amended to take account of the direction provided by this representation.	
062/01/C12/LC/US18.2&5.3	Thomas Wilkinson	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/4	The Garden Village proposal contains almost no provision for employment opportunities, the justification for demand in this area is that 'Thousands of jobs are being created at Lancaster University and Health Innovation Campus'. This is simply not true, the majority of guaranteed roles at the Innovation Campus will be transfers of existing jobs in the University. There are to date no companies engaged with the Campus and the project is some way behind schedule. Bairrig Garden Village is vastly more expensive than any of the other proposed Garden Villages and does not represent value for money to the tax payer. Employment opportunities are no growing in Lancaster, the University has no plans for major expansion.	No suggested amendments made.	No
062/02/C12/NLC1&2&4&5/US1-4	Thomas Wilkinson	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	NLC/1 NLC/2 NLC/5	US/1 US/2 US/3 US/4	I would suggest the a complete overhaul and reassessment needs to be undertaken in relation to the viability assessment. The assessments were not completed until after the publication of the Local Plan. The NPPF requires careful attention to viability and costs in plan-making and I would therefore question as to how the Local Plan can be described as sound when it was prepared before the viability report was available?  The infrastructure delivery for the Garden Village places great emphasis on a successful bid to the Housing Infrastructure Fund, however in Autumn 2018 the Department for Communities and Local Government stated that 80% of the Fund must go to the 50% of local authorities that have the least affordable houses compared with wages. Lancaster does not fall into this bracket.  No justification exists for the housing demand, no evidence is provided for the projected job growth in the area and no funding in place for significant elements of the plan.	No suggested amendments made.	No
138/01/C12/LC/US1-4	Tim Parsons	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	At the request of the representative no summary has been provided. Only a full version of the representation is available.	At the request of the representative no summary has been provided. Only a full version of the representation is available.	No
126/02/C12/LC/US2-4	Val Purnell	N/A	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/2 US/3 US/4	The proposal for Bairrig Garden Village is against Government guidelines as it will be built on farmland and not brownfield land. Greenfield development potentially damages wildlife and exacerbates flood risk. Lancaster University is the largest employer but what evidence is there to support the vast expansion of jobs predicted? Is it realistic to suggest 2,000 jobs will be created at the Health Innovation Campus? The Garden Village has the potential to increase car use in South Lancaster by over 7,000 vehicles. Increasing use of public transport, cycling and walking is aspiration and do not reflect current attitudes. This means serious danger of increased congestion and air pollution.	The Bairrig Garden Village is based on aspiration. I suggest it should be dropped until such a time as realistic estimates of jobs have been provided and evidence of how many people will actually travel to work and school.	No
063/01/C12/NLC3&5&3.5/US4	Derek Woods	NHS Property Services	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	NLC/3 NLC/5 NLC/6	US/4	The sections relating to the Bairrig Garden Village do not make specific mention of the impact on health facilities in allocating land for future housing development. This can be said generally of the whole document as a whole when dealing with housing growth.  The planning authority have a duty to consider the impacts on health, including health infrastructure provision when dealing with future development. In order to make such development, such as the Bairrig Garden Village, affordable and sustainable, the plan needs to be specific so that land will be allocated for health purposes as part of any spatial development masterplan.	The plan needs to be specific in terms of impacts on health infrastructure in order to be compliant with Chapter 8 of the NPPF.	No
017/01/C12/LC/US1-4	Bill Scott	Not Applicable	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/1 US/2 US/3 US/4	Does Lancaster need extra housing? Are the population increases realistic? What will the houses cost? How will this affect property prices? How will new infrastructure be funded? Where will people work? How will air pollution be managed? Have impacts on the local road network been considered?	Bairrig Garden Village should be removed from the Plan until such a time as information is publicly available to demonstrate that it is viable, deliverable and affordable and that all aspects have been considered.	No
033/01/C12/LC/US2-3	Michael Hardy	Scotforth Parish Council	Strategic Policies & Land Allocations DPD	Chapter 12	SG 01 SG 02 SG 03	N/A	LC	US/2 US/3	The DPD is unsound due to the Garden Village proposals planned size and consequent effect on local transport. The increases in traffic will make key corridors such as the A6 in South Lancaster, Lancaster City Centre and the crossings of the River Lune more congested. This will seriously impact on the success of any proposed Bus Rapid Transit project. The creation of a new Cycling Superhighway in the South of Lancaster is not practicable which would require a dedicated route which would be difficult to achieve. Proposed development to the East of the M6 would be challenging. Development would not be acceptable in the vicinity of the wind turbine, siting development near the motorway would not be acceptable and there would be significant increases in traffic on the rural roads. If job growth is not realised then the Garden Village would become a dormitory area which would rely on commuting.	The Garden Village proposals should be removed from the DPD completely until further assessment works are completed. Its size should be reduced from 3,500 to previously suggested levels of 1,300.	Yes
148/09/SG2/LC/US18.3	Jon Power	CBRE on behalf of Lancaster University	Strategic Policies & Land Allocations DPD	Chapter 12	SG 02	N/A	LC	US/1 US/3	The University fully supports the acknowledgement of the Health Innovation Campus as a strategic site in the Plan. However, Policy SG2 should reflect the lawful planning position and therefore reference to a masterplan and details matters are not considered to be appropriate. Matters of detail should be considered against the existing policies of the Strategic Policies & Land Allocations DPD, Development Management DPD and future Bairrig Garden Village DPD.	In order to ensure that Policy SG2 is up to date and reflect the lawful position it is recommended that the policy is reworded to remove the detailed matters of policy.  Further detailed wording is provided within the representatives full response.	Yes
029/04/SG2/LC/5	Adam Key	Savills on behalf of the Bairrig Farmland Trustees	Strategic Policies & Land Allocations DPD	Chapter 12	SG 02	N/A	LC	5	The Trustees support the University Campus on land to the south west of Bairrig Lane. We also note that the Campus sits within the Garden Village area but still benefits from a site specific allocation.	For the reasons set out in representation 029(B) and 029(C) we would wish to see a similar approach taken to the Bairrig Lane site.	Yes

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Intert) ATTENDING EXAMINATION
148/10/SG3/LC/US18.3	Jon Power	CBRE on behalf of Lancaster University	Strategic Policies & Land Allocations DPD	Chapter 12	SG 03	N/A	LC	US/1 US/3	<p>The University fully supports the improvements to Junction 33 of the M6 and the positive impacts that could deliver. However, the university comments that a comprehensively planned junction with improved access to and from the A6 from Hazeilgg Lane will be necessary to protect users of the road. The University continues to seek the opportunity for improved accessibility to Forrest Hills and the commercial opportunities can be developed as part of these improvement works.</p> <p>The University support the reference in the policy references that infrastructure improvements will be primarily sourced from public sector intervention and the any private developer contribution sought through the planning process will be secured through an appropriate charging mechanism. Given planning permission has already been secured for the Health Innovation Campus, it is important that this development cannot be expected to contribute towards a prospective CL charge.</p> <p>Whilst the University is supportive of local peoples provision of a new retail centre to serve the Garden Village will deliver that objective, such retail development should not harm or preclude development associated with the Junction 33 improvements in terms of services or retail provision. Most importantly, the new Garden Village local centre should not constrain additional on-campus commercial development.</p>	No suggested amendment made.	Yes
169/10/SG3/LC/US18.3	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Strategic Policies & Land Allocations DPD	Chapter 12	SG 03	N/A	LC	US/1 US/3	<p>CEP welcome the support given within Policy SG3 to the delivery of a new centre as part of Bailing Garden Village. CEP have previously set out a detailed vision for the delivery of a district centre at Scotforth Road. To ensure the soundness of the DPD, Policy SG3 should be updated to clarify that any proposed retail centre should be of a district centre scale to meet latent needs in South Lancaster.</p> <p>Furthermore in the interests of soundness it should be ensured that any site specific financial contributions accord with the relevant tests for planning obligations set out in paragraph 204 of the NPPF.</p> <p>The provision of infrastructure and their mechanism for delivery should be explored further by landowners and developers through an evidenced based approach.</p>	It is CEP's view that the Garden Village should be removed from an future CL Charging Schedule. Much of the infrastructure required across the Garden Village seek to address either existing deficiencies or needs arising over the plan period without any new development. On this basis omitting the Garden Village from any CL charge would result in a more effective and sound SPD and more flexibility to deliver its housing requirement.	Yes
169/30/SG3/LC/US18.2	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Strategic Policies & Land Allocations DPD	Chapter 12	SG 03	N/A	LC	US/1 US/2	<p>Policy SG3 of the Strategic Policies &amp; Land Allocations DPD should acknowledge that any obligations need to be directly related to the development, necessary in order for the development to proceed and be fairly and reasonably related to the scale and kind of development.</p> <p>At this stage the emerging DPDs identify scope for the Garden Village to fund or at least contribute to a wide array of infrastructure. In the context of the viability assessments prepared by LSH do not provide any commentary for viability for the sites which relate to Bailing Garden Village in South Lancaster. Without any detailed understanding of the viability of the Garden Village, it is imperative to the soundness of SG3 that any crude assumptions as to the scope of developer contributions are omitted at this stage. [Further detail provided in the representors full response.]</p>	No suggested amendment made.	Yes
029/05/SG3/LC/US2	Adam Key	Savills on behalf of the Bailing Farmland Trustees	Strategic Policies & Land Allocations DPD	Chapter 12	SG 03	N/A	LC	US/2	<p>It is anticipated by the Trustees that development on the Bailing Lane Site will make the necessary contribution to infrastructure improvements in the South Lancaster area, subject to detailed consideration of viability. Notwithstanding this, we do not consider all development to the South of Lancaster at Bailing Garden Village (and particularly the Trustees site) should be delayed in being brought forward, pending infrastructure improvements.</p>	No suggested amendments made.	Yes
163/10/SG3/LC/US2-4	David Diggle	Turley on behalf of Peel Holdings Investments	Strategic Policies & Land Allocations DPD	Chapter 12	SG 03	N/A	LC	US/2 US/3 US/4	<p>Policy SG3 sets out the infrastructure requirements for South Lancaster. The cost of delivery is yet to be fully estimated but it is clear that it will be significant. Whilst successful funding bids have been made to public sector agencies it is clear that further significant strategic investment is required to deliver the Garden Village. Whilst it is appropriate and necessary for new development to help facilitate infrastructure improvement where there is clear evidence to, it is neither viable or appropriate for the development industry to be solely responsible for infrastructure funding. It is proposed that the funding to secure strategic infrastructure is secured through the Housing Infrastructure Fund.</p> <p>Peel supports, in principle, the acceptance in Policy SG3 that the Garden Village is to contribute to infrastructure requirements in a fair and equal manner. However further information regarding the level of infrastructure required needs to be provided.</p> <p>Peel considers that CL may not be the more appropriate mechanism to fund critical infrastructure for the Garden Village due to the level of development which would be required before any sufficient CL income has been achieved. CL is therefore a relatively slow and inefficient mechanism, and its ability to fund up-front infrastructure. [Further detail provided in the representors full response.]</p>	<p>A key priority must be to assemble a robust and comprehensive evidence base regarding infrastructure requirements and for all delivery partners to define an appropriate approach to funding and the delivery of the necessary infrastructure for the Garden Village. Evidence must consider all potential infrastructure requirements, early engagement with the relevant utility providers, preparation of robust evidence in relation to economic viability and an investigation into the potential for public sector funding.</p> <p>There are a range of alternative potential delivery mechanism for infrastructure development which may be feasible, including the role of S106 agreements. The Council should note recent Government guidance which proposes to remove the restrictions on S106 pooling in certain circumstances and requires the publication of an Infrastructure Funding Statement. This could potentially resolve a number of the constraints on funding and delivering strategic infrastructure.</p>	Yes
078/03/SG3/LC/US1-2	Peter Shannon	WYG on behalf of Drinkwater Mushrooms	Strategic Policies & Land Allocations DPD	Chapter 12	SG 03	N/A	LC	US/1 US/2	<p>Drinkwater Mushrooms note that Policy SG3 which seeks to ensure that infrastructure is delivered to facilitate growth in South Lancaster, for example the reconfiguration of Junction 33. Whilst we do not object to the principle of this policy, Drinkwater Mushrooms consider that more detail should be made available and be subject of consultation. As a significant business and landowner in the area, Drinkwater Mushrooms are a primary stakeholder in this process.</p>	Text should be added to paragraph 12.36 to provide comfort that local businesses and landowners will be engaged in any work for the reconfiguration of Junction 33.	Yes
020/02/SG18.76/96.11812/LC	Marcus Hudson	Lancashire County Council (Education)	Strategic Policies & Land Allocations DPD	Chapter 12 Chapter 14 Chapter 15 Chapter 16	SG 01 SG 07 SG 09 SG 11 SG 12	N/A	LC		<p>The total housing identified for the Garden Village is noted to be 3,500, however the build-out rates for the life of the plan have now been extended for 3 years beyond 2031. The Education team are seeking clarification that the 3,500 dwellings are included in the overall figure or are in addition to the overall 12,000 dwellings identified for development in the plan, or if the remainder of the 3,500 will be counted in to deliver beyond 2034. Previous discussion with the City Council have clarified the requirements for education provision to meet future needs and it is appreciated that these are identified in the Local Plan. [Further detail is provided in the full response.]</p>	No suggested amendments.	TBC
097/11/SG38&8.108.13/LC/US1-4	Joanne Harding	Home Builders Federation	Strategic Policies & Land Allocations DPD	Chapter 12 Chapter 14 Chapter 15 Chapter 16	SG 03 SG 08 SG 10 SG 13	N/A	LC	US/1 US/2 US/3 US/4	<p>The Council have not published a whole plan viability assessment as part of this consultation and therefore it is not possible to consider whether the policy requirements and site specific infrastructure requirements for the Strategic Sites identified are viable.</p> <p>This lack of evidence is not considered acceptable as it fails to give the development industry the opportunity to submit comments on the viability of the plan prior to its submission. It also suggests that the cumulative impact of the plan on development viability did not inform its preparation and the Council at this point cannot say whether the plan is deliverable. Paragraph 173 of the NPPF requires Council's to consider the viability of policies in the Local Plan, therefore the HBF consider the viability assessment to be a key supporting document that should have been published as part of this consultation.</p>	No suggested amendments made.	Yes
050/07/SG1&2&3&7&9&EC3&H1-6&005&2&3&6&7&8&8&9&10/LC/US4	Emily Hrycan	Historic England	Strategic Policies & Land Allocations DPD	Chapter 12 Chapter 14 Chapter 15 Chapter 18 Chapter 20 Chapter 21	SG 01, SG 02 SG 03, SG 07 SG 09, EC 03 H 01, H 02, H 09 H 04, H 05, H 06 DOS 02 DOS 03 DOS 06 DOS 07 DOS 08 DOS 09 (N/A)	N/A	LC	US/4	<p>The development of several of the sites included as allocations have been identified in the Heritage Impact Assessments as being likely to result in harm to elements which contribute to the significance of heritage assets in the vicinity. Where this is the case, these site assessments set out a series of measures which, if implemented, will either remove or reduce harm, and will ensure that the site is developed in a manner that is consistent with preserving the historic environment. Because of the sensitive nature of these locations it is not sufficient merely to rely on general, non-site specific policies to address this matter. [Further detail provided in the representors full response.]</p>	The inclusion of an additional bullet point to the development proposals that refer to site specific mitigation / enhancement measures and design consideration outlined in the Heritage Impact Assessment document. Alternatively the plan should be amended to ensure reference is made to the mitigation measures in the HA through a direct reference to the document. [Further detail provided in the representors full response.]	
106/40/SG18/44/LC/US1-4	Ian Gilbert	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 12 Chapter 20	SG 01 H 04	N/A	LC	US/1 US/2 US/3 US/4	<p>With regard to the viability assessments prepared by Lambert Smith Hampton (LSH), the applicant has raised with the Council during the draft of the documents, however we note that the feedback provided to LSH has not been considered across the assessment, particularly in regard to our clients site at SG12. Whilst we consider the site is capable of offering a viable and credible scheme the key to viability cost that applied to the development of the site. As set out by the Council these include public transport, education, recreational / sports facilities. Unless these costs are known the viability of the scheme remains a fluid calculation. We disagree with the land values set out in the viability assessments, the £200k per acre is very low and it is not clear what the justification for this valuation is. Local Agents have suggested a level of £350k per acre after an allowance is made for affordable housing / s106 deductions.</p> <p>With regard to the viability assessments prepared by Lambert Smith Hampton (LSH) it will be important that abnormal costs are reflected in more detailed site-specific modellings. However, notwithstanding the above for the purposes of the Stage 2 Viability Assessment no abnormal costs have been modelled and LSH has assumed no s106 costs in order to assess the baseline viability position for development across the district. We consider that with the re-assessment of the site based on accurate land values, and with more accurate costs in relation to abnormal costs (and taking into account a series of specific points made on the viability assessment - see representors full response for detail - that the site would be found to be unviable with the proposed costs taken into account.[Further detail provided in the representors full response.]</p>	No suggested amendments made.	Yes
106/39/SG1&SG3&H4/LC/US1-4	Ian Gilbert	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 12 Chapter 20	SG 01 SG 03 H 04	N/A	LC	US/1 US/2 US/3 US/4	<p>With regard to the Stage 1 Transport Assessment undertaken by WYG, it describes the methodology and key parameters used to model traffic impacts of the emerging Local Plan development sites. It is not plausible that the transport assessment can have been taken into account in the Site Allocations process. Chapter 1 of the Transport Assessment notes that the modelling work does not include an up to date Strategic Transport Model and therefore is not capable of modelling transport impact of district wide development or infrastructure schemes. In essence the assessment models the worst case scenario of adding together the highway impacts of individual development proposals. We question the appropriateness of testing the above on a 'worst case' scenario given the Council's assertion within the Local Plan that housing should be restrained on the basis of the constraints which exist within the Lancaster housing market. It is incumbent on the Council to rely on sufficiently robust evidence to assess the levels of housing it requires, particularly where the Council is seeking to restrict the housing supply below the OAN. The Stage 1 Transport assessment document does not appear to achieve that aim. It is considered presumptuous to restrict housing supply on the basis of inaccurate assessment of likely highway impacts or the likely effectiveness of mitigation.</p> <p>With regard to the Stage 2 Transport Assessment undertaken by WYG, concern is raised over the costs which have been included for South Camforth which do not appear to have been factored into any assessment of viability of the Council's proposed allocations. The Council's proposed method of funding for the majority of the infrastructure requirements is through private developers, with only vague timescales have been provided in a number of instances. It remains our clients view that the IDP remains effectively a 'wish list' by the Council and does not sufficient take into consideration the viability impacts associated with the delivery and development of strategic site. As such it remains our view that without further evidence being provided by the Council regarding the impact of costs on individual site allocations that the Local Plan as drafted has the ability to threaten the viability of any scheme. [Further detail provided in the representors full response.]</p>	No suggested amendments made.	Yes
050/08/SG4/LC/US4	Emily Hrycan	Historic England	Strategic Policies & Land Allocations DPD	Chapter 13	SG 04	N/A	LC	US/4	<p>The NPPF requires Plans should contain policies to deliver the conservation and enhancement of the historic environment and how to guide the presumption in favour of sustainable development. Therefore a key planning issues within this policy must be the safeguarding of those elements that contribute to the City's rich historic environment whilst providing opportunities for its enhancement.</p>	Incomplete suggestion made.	
074/01/13.2/LC/S	Tom Clarke	The Theatre Trust	Strategic Policies & Land Allocations DPD	Chapter 13	SG 04	13.2	LC	S	<p>The trust welcomes the recognition of the range of arts and cultural attractions in the district including its theatres and performance venues.</p>	No suggested amendments made.	No
122/02/SG5/LC/S	Tim Bettany - Simons	Canal and River Trust	Strategic Policies & Land Allocations DPD	Chapter 13	SG 05	N/A	LC	S	<p>The Trust support the thrust of this policy in terms of improving links to the canal, in terms of utilising canal frontage and the protection and enhancement of biodiversity. For greater clarity and cross cutting with other policies it is considered appropriate to make reference to Policy T3 of the DPD.</p> <p>It may also be desirable to include reference to improvement to cycling and pedestrian access towards Lancaster City Centre making use of the existing canal towpath.</p>	Detailed wording is suggested within the representors full response.	No
050/09/SG5/LC/S	Emily Hrycan	Historic England	Strategic Policies & Land Allocations DPD	Chapter 13	SG 05	N/A	LC	S	<p>Historic England support this proposed policy, however recommend a textual change to bullet point ii which makes reference to the need to repair the existing fabric and also make reference to features that maybe of historic importance to the site.</p>	Suggested wording suggested by Historic England with regard to Bullet Point ii	
001/01/SG5/LC/S	Abigail Mann	N/A	Strategic Policies & Land Allocations DPD	Chapter 13	SG 05	N/A	LC	S	<p>No detailed response provided</p>	No amendments suggested.	No
175/01/SG5/NLCS/US3	Alison Ransome	N/A	Strategic Policies & Land Allocations DPD	Chapter 13	SG 05	N/A	NLC/S	US/3	<p>The stated aim for the Canal Corridor is for retail, leisure and cultural and yet all that has been seen is a huge amount of student accommodation. This will make the area a ghost town in the summer and means that buildings have not been used for affordable housing and lost of cultural value. In addition the key aims of this part of the document appear to be mostly about car parking. The policy lacks imagination.</p>	No suggested amendments made.	No
111/03/SG5/LC/US3	N/A	Savills on behalf of the Roubain Group & Elston Holdings Ltd	Strategic Policies & Land Allocations DPD	Chapter 13	SG 05	N/A	LC	US/3	<p>Whilst there is broad support for the aspirations of Policy SG6 and the regeneration of Lancaster City Centre and adjacent areas it is considered the requirement for a retail impact test for certain forms of development should be included in this policy. The Canal Corridor scheme is designed to form a sustainable extension to the City Centre, however the objective is to ensure that Canal Corridor site provides complementary floorspace to ensure that City Centre evolves into an attractive commercial destination but not at the expense of the existing offer in the City Centre.</p>	It is considered that an extra part should be added to Policy SG6 to ensure that it is consistent with Policy TC2 stating 'Where applicable. Development proposals will be subject to a Sequential Assessment and Impact Test in accordance with National Planning Guidance and Policy DM14 of the Development Management DPD.'	
196/01/SG5/LC/S	Graham Love	Smith & Love Planning Consultants on behalf of Maple Grove Developments	Strategic Policies & Land Allocations DPD	Chapter 13	SG 05	N/A	LC	S	<p>Maple Grove fully supports the City Council's proposed approach to regeneration and long term ambition to regenerate the Canal Quarter expressed in the Plan. The Canal Quarter offers a significant opportunity that offers wide-ranging benefits and will deliver major economic cultural, leisure and residential boost to Lancaster City Centre.</p> <p>Maple Grove support the fresh approach that the Council is taking to regeneration in this area and its commitment to re-shape, multi-purpose regeneration which is less reliant on retail floorspace. This includes the opportunity to increase the presence of Lancaster University.</p> <p>Maple Grove has reviewed the relevant additional evidence and confirms that this mixed use regeneration of the Canal Quarter is deliverable and can be brought forward in the immediate short term. Whilst heritage is a primary driver of the regeneration, the evidence base recognises that development costs and financial viability is a fundamental factor in the successful delivery of the site.[Further detail provided in the representors full response.]</p>	No suggested amendment made.	Yes
050/10/SG6/LC/S	Emily Hrycan	Historic England	Strategic Policies & Land Allocations DPD	Chapter 13	SG 06	N/A	LC	S	<p>We support policy SG6 which puts forward a strategic framework for the appropriate re-use and regeneration of this important asset. We welcome the inclusion of Lancaster Quay, Quay Meadow and Vicarage Field areas in particular references to specific projects.</p>	No suggested amendments made.	
018/01/SG5&7&9&11&12/LC/US3	Brian Jones	N/A	Strategic Policies & Land Allocations DPD	Chapter 13 Chapter 14 Chapter 15 Chapter 16	SG 05 SG 07 SG 09 SG 11 SG 12	N/A	LC	US/3	<p>The Development Briefs specified within Policies SG5, 7, 9, 11, 12 should specify explicitly that they need to follow the heritage protection, especially landscape heritage described in policies DM37-DM40 in the same way that environmental considerations are covered in Policies DM42-DM44 of the emerging Development Management DPD.</p>	As described in the Summary.	Yes
122/03/SG7/LC/S	Tim Bettany - Simons	Canal and River Trust	Strategic Policies & Land Allocations DPD	Chapter 14	SG 07	N/A	LC	S	<p>The Trust support the thrust of this policy in particular criteria VIII in terms of providing a positive inter-relationship with Lancaster Canal and a link to Policy T3 of the DPD.</p>	No suggested amendments made.	No

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Insert) ATTENDING EXAMINATION
100/14/SG7/LC/US1-4	David Barnes	Star Planning on behalf of Seemore Properties Ltd	Strategic Policies & Land Allocations DPD	Chapter 14	SG 07	N/A	LC	US/1 US/2 US/3 US/4	<p>Although the principle of the East Lancaster Strategic site is supported, objection is made to the indicated extent of the allocation identified. The high-level masterplan which has been submitted by Seemore Properties identifies land which is suitable for development. The choice of land which can accommodate development has had regard to the landscape context, topography, proximity to the M6 and the desire to maintain views towards the Ashton Memorial.</p> <p>The Local Plan does not include land at (and around) Cuckoo Farm for built development, specifically housing. This formal representation is supplemented by landscape evidence to suggest that this land should be included for development purposes.</p> <p>Objection is also made for the requirement for a Development Brief to be prepared which will add an unnecessary level of preparation which should be removed from both Policy SG7 and paragraph 14.5. The preparation of such a brief will involve unnecessary delay and could be better addressed through a collaborative masterplanning exercise, led by Seemore Properties Ltd, to inform the future planning application. Attached to this representation is the current high-level masterplan for East Lancaster Strategic Site.</p> <p>Further detailed responses to each of the criteria listed in SG7 are provided within the full representation. Further detail is also provided in relation to Seemore Properties timescales for development of the East Lancaster Strategic Site.</p>	<p>On the Inset 1 Map, the Cuckoo Farm buildings and associated land should be included within the extent of Policy SG7 and excluded from the Urban Setting Landscape defined by Policy EN7.</p> <p>Policy SG7 should be amended to delete paragraphs 2 and 3 and the removal of reference to a Development Brief. The last paragraph should be replaced with:</p> <p>'Appendix XX / Figure XX includes a development framework which identifies how the East Lancaster Strategic Site is expected to come forward for development. A more detailed masterplan for the site will be prepared in conjunction with the Council, statutory consultees and the local community and, together with the requirements set out below, will provide the basis for addressing matters such as land uses, infrastructure and phasing.'</p> <p>Further detailed wording changes are recommended for the individual criteria contained in Policy SG7 - these are set out in detail via the representatives full response.</p>	Yes
100/18/SG7/NA	David Barnes	Star Planning on behalf of Seemore Properties Ltd	Strategic Policies & Land Allocations DPD	Chapter 14	SG 07	N/A	N/A	N/A	<p>Seemore Properties note the content of the Local Plan Viability Assessment (Stage 2) and, through participation at workshop events, have made a number of comments about its content. Although these comments do not undermine the overall assessment of the viability of the East Lancaster Strategic Site it is worthy of note that the Assessment does refer to the appropriateness of strategic sites to conduct further detailed site viability modelling to consider matters such as abnormal costs and infrastructure.</p> <p>Seemore Properties intend to undertake such viability modelling to accompany the planning application which will, by its very nature, be more detailed than the work undertaken at a strategic level by Lambert Smith Hampton as part of the evidence base for the Local Plan.</p>	<p>To assist the Council, it would be worthwhile ensuring that the items of infrastructure assumed in the viability assessment and infrastructure delivery plan are consistent.</p>	Yes
100/19/SG7/NA	David Barnes	Star Planning on behalf of Seemore Properties Ltd	Strategic Policies & Land Allocations DPD	Chapter 14	SG 07	N/A	N/A	N/A	<p>Although not expected to impact on the East Lancaster Strategic site, it is noted that some of the proposed improvement works around Lancaster potentially involve non-highway land.</p>	<p>It would be useful for the Council to clarify that, in appropriate circumstances and subject to suitable arrangements, it would use its Compulsory Purchase Powers to facilitate such improvements. There would be a clear planning purpose to secure the implementation of policies and proposals in the Local Plan.</p>	Yes
100/20/SG7/NA	David Barnes	Star Planning on behalf of Seemore Properties Ltd	Strategic Policies & Land Allocations DPD	Chapter 14	SG 07	N/A	N/A	N/A	<p>Seemore Properties submitted representations at the Regulation 19 stage concerning the extent of the Urban Setting Landscape at East Lancaster. This additional report prepared by Galpin does nothing to change the view of Seemore Properties and its landscape consultant about the soundness of the Local Plan in respect of this matter and that the land around Cuckoo Farm buildings adjacent to the prison should be excluded from this unnecessary landscape designation. Indeed the original landscape work undertaken for the Council by Arcadis agreed with Seemore Properties about the value of this land and that the land could be included within the developable area of the East Lancaster Strategic Site. How the land around Cuckoo Farm buildings could come forward for development is a matter which can be addressed as part of the master planning process.</p>	<p>That land which surrounds Cuckoo Farm Buildings is included in the wider East Lancaster Strategic Site allocation.</p>	Yes
122/04/SG8/LC/5	Tim Bettany - Simons	Canal and River Trust	Strategic Policies & Land Allocations DPD	Chapter 14	SG 08	N/A	LC	5	<p>Criteria VI of the policy relates to the creation of improved cycling and walking. For reasons of clarity and to align with Policy SG7 the Trust consider that towpath improvements should be explicitly mentioned. It would also then align with Policy SG10.</p>	<p>Criteria VI should be amended to read: 'The creation of improved cycling and walking linkages between the proposed growth in East Lancaster, Caton Road Employment Area, Lancaster City Centre, the Ridge Estate and new developments to the south of Strategic Site SG7. Opportunities for improvements along the Lancaster Canal should be explored. Proposals should come forward with appropriate mechanisms for future maintenance of the new / improved routes.'</p>	No
100/15/SG8/LC/US1-4	David Barnes	Star Planning on behalf of Seemore Properties Ltd	Strategic Policies & Land Allocations DPD	Chapter 14	SG 08	N/A	LC	US/1 US/2 US/3 US/4	<p>Whilst the principle of the East Lancaster Strategic Site is supported, objection is made to some of the requirements or at least the way they are expressed in Policy SG8. It is important to note that at this point in time the Council have not published a viability study or an assessment of this strategic site. Accordingly modification made be needed at a later date.</p> <p>It will have to be demonstrated that there is insufficient capacity in the existing primary schools before any new school of whatever size is to be provided. Furthermore there should be an onus of the Education Authority to explore all sources of funding for a new school and not rely on developer contributions. If additional land is required above and beyond a single form entry school then the Education Authority will be required to pay for land at market rate. Similar demonstration will be required before any secondary school contribution will be provided.</p> <p>There should be recognition in the plan that any site for a medical centre will be a commercial transaction rather than a requirement to provide a free site.</p> <p>The management of the country park should not be pre-determined. It may well be that a wildlife trust or similar may be a suitable management body.</p> <p>There is no justification for any contributions towards Williamson Park given the delivery of significant open space areas on this site.</p>	<p>The changes sought include: Clarity about the need for a primary school and an over sized site. Clarity about the need for a secondary school contribution. Recognition that the site for any medical centre will be a commercial transaction rather than a planning requirement. Management of the country park is a matter which should not be pre-determined. No contributions are required towards Williamson Park. Improvements involving third party land cannot be delivered except by the owners of that land. For example improvements to the canal towpath can only be delivered by the Canal and Rivers Trust.</p>	Yes
106/18/SG9/LC/US2	Craig Barnes	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 15	SG 09	N/A	LC	US/2	<p>Land to the North of Lancaster has been identified for 700 dwellings in the Plan. This land currently lies within the Green Belt. Policy SSG sets out the requirements for the site which sets out the intention to prepare a development brief for the site. It is not clear what progress has been made in preparing that development brief. It is also unclear how many parties are involved in the promotion of the site and whether intentions are aligned to the extent that a comprehensive approach can be agreed and adhered to. There are also topographical issues with the site which will complicate housing delivery of the site.</p> <p>Given the policy requirements and uncertainties our client does not believe this site should be considered deliverable within the next five years. Given the constraints our client questions whether land north of Lancaster is suitable to deliver 700 dwellings over the plan period. Our client requests further information from the Council which sets out how the 700 dwellings identified in Policy SSG has been identified. [Further detail provided in the representatives full response.]</p>	<p>No suggested amendments made.</p>	Yes
122/05/SG9/LC/5	Tim Bettany - Simons	Canal and River Trust	Strategic Policies & Land Allocations DPD	Chapter 15	SG 09	N/A	LC	5	<p>The Trust support the thrust of this policy, in particular criteria VII in terms of providing a positive inter-relationship with the canal and the link to Policy T3, criteria XII in terms of setting of heritage assets, XVI in terms of protecting and enhancing the BHS and XX in terms of improvements of the canal towpath.</p>	<p>No suggested amendments made.</p>	No
054/05/SG9/LC/US2-3	Chris Garner	Garner Planning on behalf of Russell Arner Ltd	Strategic Policies & Land Allocations DPD	Chapter 15	SG 09	N/A	LC	US/2 US/3	<p>The interim SHELAA states that not all potential housing sites have been reviewed and remaining site assessments are currently ongoing and will be concluded for subsequent iterations of the SHELAA. If not all sites have been assessed then the City Council have not fully examined all other reasonable options for meeting its OAN or identified need for development. As a result exceptional circumstances have not been justified to amend Green Belt boundaries.</p>	<p>To meet housing requirements the authority will need to allocate additional housing sites regardless of any release of land from the Green Belt as explained in representation 050/2.</p>	Yes
151/05/SG9/LC/US1-2	Matthew Symons	Hollins Strategic Land	Strategic Policies & Land Allocations DPD	Chapter 15	SG 09	N/A	LC	US/1 US/2	<p>Hollins Strategic Land has promoted land north of Hamerton Hall Lane (North Lancaster Strategic Site) and continues to support the allocation in the Plan for approximately 700 new homes. However the proposal map suggest this may not be possible.</p> <p>The proposals map identifies a large swathe of land which has been prepared as an Urban Setting Landscape via Policy EN7. If this policy is imposed on the North Lancaster Strategic site then the area would not be capable of delivering 700 dwellings. It is evident from visiting the site that this large swathe of landscape designation is not necessary and indeed the proposed areas of public open space would be sufficient to achieve good design.</p> <p>It is also noted that the land to the west of the canal has also been entirely covered by the Urban Setting Landscape designation. This appears to be contradictory and the Proposals Map should be made clear in this regard. Whilst this specific area of land is under the ownership of the County Council they are interested in securing residential development on this site. The Plan needs to be clear on its intentions for this land.</p>	<p>It is considered that the Urban Setting Landscape should be removed from this area or significantly reduced.</p> <p>The Plan should clarify its intentions for land between Lancaster Canal and Barley Cop Lane both within the Policy and on the Proposals Map.</p>	Yes
155/05/SG9/LC/US2-3	Paul Nellist	HOW Planning on behalf of Taylor Wimpey	Strategic Policies & Land Allocations DPD	Chapter 15	SG 09	N/A	LC	US/2 US/3	<p>Taylor Wimpey support the entire strategic allocation being covered by one single policy (as opposed to separate policies contained in the draft plan). Clarity however needs to be provided on the preparation of a Development Brief / Masterplan for the site, it is not clear whether this will be developed led or prepared in collaboration or whether a masterplan can be submitted alongside the first application.</p> <p>Policy SSG allocates approximately 700 dwellings for the site. Taylor Wimpey support this contribution towards housing needs and stresses this should not be treated as a limited or restrict the delivery of additional dwellings if this is feasible. Taylor Wimpey's previous assessment work concludes that delivery could achieve upwards of 940 dwellings, a modest level of land for employment / local centre and contributions to key infrastructure.</p> <p>There appears to be an inconsistency between the evidence base and SSG which must be addressed to ensure soundness. For example land to the western extent of the North Lancaster Strategic Site was not included in the SHELAA. This appears to be a drafting oversight as the Council have confirmed that this site is not suitable as it currently forms part of mitigation land associated with the Bay Gateway. This parcel of the site cannot contribute to the delivery of housing or infrastructure and should be removed from the strategic allocation. [Further detail provided in the representatives full response.]</p>	<p>In order to ensure the Plan can be found sound, the Council must fully review the evidence base regarding the North Lancaster Strategic Site to ensure it is robust complete and up-to-date.</p>	Yes
026/01/SG9/LC/US2	Margaret Hayhurst	N/A	Strategic Policies & Land Allocations DPD	Chapter 15	SG 09	N/A	LC	US/2	<p>Objection raised to the residential development identified under Policy SSG of the DPD given the current drainage matters - halton Road already floods at times of high rainfall. There are no main sewer pipes in the area, there is a lack of local school places and there are also a significant number of houses available to buy in Halton (100 houses). No further housing is needed.</p>	<p>No suggested amendments made.</p>	No
036/01/SG9/NC2/US2	Rupert Douglas-Jones	N/A	Strategic Policies & Land Allocations DPD	Chapter 15	SG 09	N/A	MLC/2	US/2	<p>Insufficient consultation on the proposals in our area, no risk assessment has taken place in relation to local flooding, work has already to address flooding but this has been unsuccessful. Putting residential or industrial development in this area will make matters worse. The presence of natural springs in this area add to this issue and will be difficult to prevent.</p>	<p>It is essential that the surface water is given an area to drain through, conduct a risk assessment in relation to this matter.</p>	Yes
151/08/SG9/LC/US3	Lydia Harger	PWA Planning on behalf of Hollins Strategic Land	Strategic Policies & Land Allocations DPD	Chapter 15	SG 09	N/A	LC	US/3	<p>There is concern that the Council is unduly limiting the amount of developable area of the allocation through the inclusion of an arbitrary blanket landscape buffer when it can be seen from the requirements of Policy SSG that the identified assets would be safeguarded through a sensitive design approach.</p> <p>To ensure the deliverability of the entire site, and therefore the minimum amount of homes required in the district during the plan period, it is essential that the policy is revised to ensure the provision of an unfettered access to land to the west of the A6. This is essential. Without this requirement written into the policy the Plan would not be sound in so far as it would not be effective as the housing requirement over the plan period would not be deliverable.</p> <p>To summarise, Policy SSG should include specific wording to ensure there is no ransom between landowners and/or developers with the corresponding allocated site. To not include specific wording would stifle the delivery of the total number of dwellings not only in terms of quantum but also in terms of the council's housing trajectory. It would result in a less comprehensive and therefore less sustainable and properly planned development. By ensuring that this wording is contained in the Plan gives certainty to all parties. [Further detail provided in the representatives full response.]</p>	<p>Further detail provided in Policy SSG in relation to unfettered access arrangements.</p>	Yes
155/18/C15/LC/US1-4	Paul Nellist	Avision Young on behalf of Taylor Wimpey	Strategic Policies & Land Allocations DPD	Chapter 15	SG 09 SG 10	N/A	LC	US/1 US/2 US/3 US/4	<p>Paragraph 1.3.1 of the transport assessment notes that a major limitation of the study is the absence of an up-to-date strategic transport model which would enable the impact of traffic levels of potential major highway infrastructure schemes to be determined more accurately than the method employed in the report. The approach taken in the assessment doesn't take into account for example short car trips which would likely to be numerous in any urban location. The traffic generation assignment could therefore be onerous. Clarification is sought over whether a strategic modelling exercise will be completed.</p> <p>Paragraph 1.3.2 of the assessment uses both growthed flows and development flows and as such there would be an element of double counting. This is also onerous given what is probably limited traffic growth in Lancaster over the past few years, which has been demonstrated by previous surveys that Croft Consultants have undertaken in the city.</p> <p>The build out rate assumptions set out in the modelled scenario are not explained and it seem as though all the sites are assumed to be occupied by 2033. There appears to be no justification for this approach. This will, in our view, provide too robust a position on the 2033 and probably 2023 flow scenarios. Justification for this should be provided.</p> <p>Further clarity should be provided on the levels of engagement between WVG and Lancashire County Council, highways authority for the area. [Further detail provided in the representatives full response.]</p>	<p>Further clarification is necessary in regard of the transport assessment.</p>	Yes
155/19/C15/LC/US1-4	Paul Nellist	Avision Young on behalf of Taylor Wimpey	Strategic Policies & Land Allocations DPD	Chapter 15	SG 09 SG 10	N/A	LC	US/1 US/2 US/3 US/4	<p>On behalf of our client, consultants Grasscroft have prepared a note setting out Taylor Wimpey's comments in relation to the Council's viability evidence which is included in the representatives full response. In summary the note provides comment on the proposed approach to the draft LPA, the appraisal methodology, the general assumptions used and housing delivery and viability throughout the district. [Further detail provided in the representatives full response.]</p>	<p>No suggested amendments made.</p>	Yes
155/20/C15/LC/US1	Paul Nellist	Avision Young on behalf of Taylor Wimpey	Strategic Policies & Land Allocations DPD	Chapter 15	SG 09 SG 10	N/A	LC	US/1	<p>The site presents an opportunity to increase provision of open space but due to the topography of the land, there may be limited opportunities to retain flat areas of open space for some of the typologies specified in the Open Space and Playing Pitch Assessment.</p> <p>As demonstrated through the supporting masterplan for the site, the site could provide a total area of 26.7ha of open space which would significantly exceed the expected requirement. The site therefore presents an opportunity to provide both the Camforth / Rural area and Lancaster area with a large area of publicly accessible open space. [Further detail provided in the representatives full response.]</p>	<p>No suggested amendments</p>	Yes
155/22/C15/LC/US1-4	Paul Nellist	Avision Young on behalf of Taylor Wimpey	Strategic Policies & Land Allocations DPD	Chapter 15	SG 09 SG 10	N/A	LC	US/1 US/2 US/3 US/4	<p>The evidence base of Policy EN7 as presented fails to appropriate attribute weight to the evolving character of the area around site allocation SSG9. As such the policy has potential to unnecessarily restrict development in some parts of the site which would not be expected to result in significant adverse effects following the maturity of newly implemented landscape treatments. This could reduce the potential development yield and affect site viability. Further to this the evidence base cannot with any certainty consider the effects of all potential development options for this site, some of which may contain mitigation measures to reduce adverse effects on landscape character.</p> <p>If the principle of protected 'Urban Setting Landscapes' (USL) is to be retained then we respectfully recommend that a more appropriate method of implementing this would be through a strategic policy which does not seek to definitively define limits of development but establishes key characteristics which are valued about a site and its context. If a USL must be defined then we would recommend amendments to this which attributes greater weight to the inevitable maturity of landscape treatments associated with the A683. A suggested boundary is provided as part of Taylor Wimpey's full submission.</p> <p>Whilst Taylor Wimpey's position remains that a USL line should not be included on the proposals map, a suggested USL line is included as part of these representations, Taylor Wimpey and their landscape consultants Randall Thorp are prepared to continue to work with the Council on this matter. [Further detail provided in the representatives full response.]</p>	<p>That the USL designation is removed from the SSG North Lancaster Strategic Site, if it is to remain then an alternative boundary (as suggested as part of this submission) should be included which reflects the maturity of the landscape treatments associated with the A683.</p>	Yes
155/22/C15/LC/US1&2	Paul Nellist	Avision Young on behalf of Taylor Wimpey	Strategic Policies & Land Allocations DPD	Chapter 15	SG 09 SG 10	N/A	LC	US/1 US/2	<p>With regard to the housing standards paper, there appear to be inconsistencies between the content of this paper and the direction of Policy DM2.</p>	<p>Taylor Wimpey respectfully request that the wording in the Housing Standards paper be corrected to correspond with Policy DM2 of the emerging Development Management DPD.</p>	Yes

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Intend) ATTENDING EXAMINATION
011/01/C15/LC/US2&4	Philip Newby	N/A	Strategic Policies & Land Allocations DPD	Chapter 15	SG 09 SG 10	N/A	LC	US/2 US/4	Strong objection to the development of this site [Policy SG9] which is designated Green Belt. The area lacks sufficient infrastructure and is home to a range of wildlife. The land remains in active farming.	To remove the allocation SG9 from the Local Plan.	Yes
122/06/SG10/LC/5	Tim Bettany - Simons	Canal and River Trust	Strategic Policies & Land Allocations DPD	Chapter 15	SG 10	N/A	LC	S	The trust welcome criteria IV in terms of cycling and walking linkages and opportunities for improvement along the Lancaster Canal.	No suggested amendments made.	No
155/06/SG10/LC/US1-4	Paul Nellist	HOW Planning on behalf of Taylor Wimpey	Strategic Policies & Land Allocations DPD	Chapter 15	SG 10	N/A	LC	US/1 US/2 US/3 US/4	Policy SG9 and SG10 of the DPD seeks to place a number of requirements on the North Lancaster Strategic site including pedestrian improvements, public transport, utility infrastructure, affordable housing, heating systems, infrastructure for electric vehicles, education, open space, road network improvements. However, it does not appear that these requirements are justified and/or based on robust evidence. For example the Infrastructure Delivery Schedule lacks detail on anticipated costs and funding and does not provide sufficient certainty.  The Plan must not place unnecessarily burdensome requirements or standards on development to the point that viability and deliverability is impacted. The Council must ensure that any such infrastructure requirements are justified and based on robust and up-to-date evidence. As this is not the case, Taylor Wimpey reserve the right to comment further on these matters in the future. [Further detail provided in the representatives full response.]	The DPD must not place overly burdensome requirements on developments to the point that viability and deliverability are threatened. The evidence to support these requirements should be clearly set out or signposted in the DPD and it should be made clear in Policy SG9 and / or SG10 that these requirements are subject of viability testing.	Yes
021/05/SG9/LC/US3	David Alexander	N/A	Strategic Policies & Land Allocations DPD	Chapter 15	SG 09	N/A	LC	US/3	Strong support for Part 2.3 of the 'Identified Sites: Landscape and Visual Assessments' in relation to land at Hammetton Hall and land at Beaumont Hall, together with the key points made in the assessment summary whereby in any future development of the sites, there is a strong priority given to landscape and visual amenity in order to try and create a more seamless transition when moving towards open countryside.	The importance of landscape and visual impact in this sensitive area to the north of the city leads me to the opinion that these sites should be held in reserve at present until other priority development sites are taken up.	No
051/11/SG11/LC/US1-1&3	Dan Mitchell	Barton Willmore on behalf of H20 Urban LLP	Strategic Policies & Land Allocations DPD	Chapter 16	SG 11	N/A	LC	US/5.1 US/3	It is our clients view that Policy SG11 and SG12 are interlinked and we welcome the approach from the Council to align these policies to ensure that they are structured the same. It would be beneficial for SG11 to be master-planned in connection with SG12.	No suggested amendments made.	Yes
122/07/SG11/16.7/LC/5	Tim Bettany - Simons	Canal and River Trust	Strategic Policies & Land Allocations DPD	Chapter 16	SG 11	16.7	LC	S	The Trust support the thrust of this policy in terms of criteria V and the submission of a detailed design statement recognising its location in relation to the canal, criteria VII providing a positive inter-relationship with the Canal and links to Policy T3 and criteria VIII which maximising the waterside setting and delivering improvements.  In relation to providing a crossing over the canal, it should be added that any bridges or structures would have to consider the various navigational constraints. Furthermore, any crossings would require close liaison with the Trust in terms of design, height clearance and carrying out the works. Consideration of maintenance would also have to be considered.	The supporting text to the policy at paragraph 16.7 should be expanded in relation to the bridge crossing of the canal to include:  'Any bridges or other structures crossing the canal would have to consider various navigation constraints including navigational air draft, potential for vessel debris and impact. Furthermore, any crossing across the navigation would require close liaison with the Trust in terms of design (which would enhance the canal corridor), necessary height clearance and the carrying out of any works. Consideration and a mechanism for the ongoing maintenance of the new bridge would also need to be addressed.'	No
105/03/SG11/LC/US3	Nicola Elsworth	Homes England	Strategic Policies & Land Allocations DPD	Chapter 16	SG 11	N/A	LC	US/3	Homes England is the owner of this site and welcomes the allocation for residential led development. We also endorse the requirement for a masterplan led approach and would confirm our intent to work with the Council and partners in a collaborative manner in this regard.  Although adjacent to the SG12 site there are considerable changes in levels which may make it very difficult to establish a vehicular access between the two sites. Policy SG11 states that the Council intend to prepare a Development Brief for the site which will set out more detail. Although not specifically a matter for this Local Plan, Homes England would suggest that any Brief should align with fruited policy for these sites.	Amend SG11 to require investigation as part of a future masterplan of new access between site SG11 and SG13 if feasible / deliverable having regard to site constraints and the need to ensure a viable, deliverable development.	No
118/01/SG11/NLCS/US4	Nick Horsley	Mineral Products Association	Strategic Policies & Land Allocations DPD	Chapter 16	SG 11	N/A	NLC/5	US/4	The site would appear to impact upon known and proven mineral resources associated with Lundsfield Quarry which are clearly identified in the Lancashire Minerals and Waste Local Plan. It is acknowledged that sand and gravel resources in Lancashire are depleted.  The proposed access directly onto Back Lane could prejudice the use of this lane for HGVs accessing and egressing Back Lane Quarry and its link to Junction 35 of the M6. The M6 Quarry Link Road was specifically built for this purpose and creating a residential access onto Back Lane would prejudice this objective. Back Lane Quarry produces over a million tonnes of limestone aggregates, asphalt and concrete products every year which are critical to regional infrastructure.  Policy SG11 conflicts with NPPF paragraph 143 which seeks to ensure that known locations of specific mineral resources and infrastructure are not needlessly sterilised by non-mineral development. Safeguarding mineral resources is a sustainable practice and accords with national policy. Policy SG11 is therefore unsound as it conflicts with national policy in relation to mineral safeguarding and Green Belt.	Deletion of the policy will ensure that the plan is sound in terms of the requirements of the NPPF as it applies to minerals safeguarding, the safeguarding of minerals infrastructure and the Green Belt.	Yes
167/10/SG11-12/LC/5	Hannah Walker	Barton Willmore on behalf of SCP Consulting Ltd	Strategic Policies & Land Allocations DPD	Chapter 16	SG 11 SG 12	N/A	LC	S	in principle our client welcomes the allocation of strategic housing sites within Carnforth, however the Council must make sure a sufficient choice of employment land is available to help deliver this growth.	No suggested amendments made.	Yes
133/01/C16/LC/US1&3	Neil Wakeman	Carnforth Ranger Football Club	Strategic Policies & Land Allocations DPD	Chapter 16	SG 11 SG 12 SG 13	N/A	LC	US/1 US/3	Policy SG11 does not include the Carnforth Rangers Football ground. The Club is an integral part of the community and recent growth means the club now wishes to secure its future to deliver a organised football, training and associated facilities. Interest has been shown in acquiring the existing ground (which is not sustainable to meet current demand) by Homes England in an expectation that the land is fit for development together with the wider area of Lundsfield Quarry as designated under SG11.  The reason for this representation is that the current DPD would be more effective by extending the area shown under SG11 to include the football ground because it would then confirm that the ground would have potential for development and enable us to engage better with interested parties. We acknowledge the intentions to prepare a Development Brief for this area but believe the extension to SG11 to include the football ground would be the most positive outcome.	To include the Carnforth Ranger Football Ground within the wider allocation of SG11.	Yes
051/12/SG12/LC/US2&4	Dan Mitchell	Barton Willmore on behalf of H20 Urban LLP	Strategic Policies & Land Allocations DPD	Chapter 16	SG 12	N/A	LC	US/2 US/4	Our client is supportive of the allocation of this site for residential development, it is considered it is deliverable, suitable and available and capable of accommodating over 500 dwellings. Our client supports the release of the site from the Green Belt to facilitate residential and economic growth.  It is noted that there are a number of requirements which are to be delivered as part of the site. We continue to have concerns regarding these requirements particularly when read in conjunction with Policy SG13. Our client considers that the policy requirements are too onerous and recommends that the Council works with the developer to ascertain which requirements are achievable. The Council has also stated that they will prepare a Development Brief to address these matters but to date no such document has been produced.  It is not considered the range of requirements identified are compliant with Paragraph 204 of the NPPF, our client is agreeable to the provision of affordable homes but disagrees with the 40% requirement identified in the Policy. The approach proposed is likely to render any scheme for the site as unviable and will be contrary to paragraphs 173 and 204 of the NPPF.  The policy includes the need for highway improvements and cycling and walking links. Whilst our client is supportive in principle of these matters, clarification is required from the Council as how they envisage these to be delivered, because these are not within our clients ownership. As identified in previous representations there is no requirement for this to be included as there is no evidence of any existing highway issues. [Further detail provided in the representatives full response.]	No suggested amendment made.	Yes
051/31/LC/US1-4	Ian Gilbert	Barton Willmore on behalf of H20 Urban LLP	Strategic Policies & Land Allocations DPD	Chapter 16	SG 12	N/A	LC	US/1 US/2 US/3 US/4	With regard to the Stage 1 Transport Assessment undertaken by WYG, it describes the methodology and key parameters used to model traffic impacts of the emerging Local Plan development sites. It is not plausible that the Transport Assessment can have been taken into account in the Site Allocations process. Chapter 1 of the Transport Assessment notes that the modelling work does not include an up to date Strategic Transport Model and therefore is not capable of modelling transport impact of district wide development or infrastructure schemes.  In essence the assessment models the worst case scenario of adding together the highway impacts of individual development proposals. We question the appropriateness of testing the above on a 'worst case' scenario given the Council's assertion within the Local Plan that housing should be restrained on the basis of the constraints which exist within the Lancaster housing market.  It is incumbent on the Council to rely on sufficiently robust evidence to assess the levels of housing it requires, particularly where the Council is seeking to restrict the housing supply below the DAN. The stage 1 transport assessment document not appear to achieve that aim. It is considered presumptuous to restrict housing supply on the basis of inaccurate assessment of likely highway impacts or the likely effectiveness of mitigation. [Further detail provided in the representatives full response.]	No suggested amendments made.	Yes
051/32/LC/US1-4	Ian Gilbert	Barton Willmore on behalf of H20 Urban LLP	Strategic Policies & Land Allocations DPD	Chapter 16	SG 12	N/A	LC	US/1 US/2 US/3 US/4	With regard to the Stage 2 Transport Assessment undertaken by WYG, concern is raised over the costs which have been included for South Carnforth which do not appear to have been factored into any assessment of viability of the Council's proposed allocations. The Council's proposed method of funding for the majority of the infrastructure requirements is through private developers, with only vague timescales have been provided in a number of instances.  It remains our clients view that the DP remains effectively a 'wish list' by the Council and does not sufficient take into consideration the viability impacts associated with the delivery and development of strategic site. As such it remains our view that without further evidence being provided by the Council regarding the impact of costs on individual site allocations that the Local Plan as drafted has the ability to threaten the viability of any scheme. [Further detail provided in the representatives full response.]	No suggested amendments made.	Yes
051/33/LC/US1-4	Ian Gilbert	Barton Willmore on behalf of H20 Urban LLP	Strategic Policies & Land Allocations DPD	Chapter 16	SG 12	N/A	LC	US/1 US/2 US/3 US/4	With regard to the viability assessments prepared by Lambert Smith Hampton (LSH), the applicant has liaised with the Council during the draft of the documents, however we note that the feedback provided to LSH has not been considered across the assessment, particularly in regard to our clients site at SG12.  Whilst we consider the site is capable of offering a viable and credible scheme the key to viability cost that applied to the development of the site. As set out by the Council those include public transport, education, recreational / sports facilities. Unless these costs are known the viability of the scheme remains a fluid calculation.  We disagree with the land values set out in the viability assessments, the £209k per acre is very low and it is not clear what the justification for this valuation is. Local agents have suggested a level of £350k per acre after an allowance is made for affordable housing / s106 deductions. [Further detail provided in the representatives full response.]	The viability assessment should make use of more accurate land values as described in the responders full response.	Yes
051/34/LC/US1-4	Ian Gilbert	Barton Willmore on behalf of H20 Urban LLP	Strategic Policies & Land Allocations DPD	Chapter 16	SG 12	N/A	LC	US/1 US/2 US/3 US/4	With regard to the viability assessments prepared by Lambert Smith Hampton (LSH) it will be important that abnormal costs are reflected in more detailed site-specific modellings. However, notwithstanding the above for the purposes of the Stage 2 Viability Assessment no abnormal costs have been modelled and LSH has assumed no s106 costs in order to assess the baseline viability position for development across the district.  We consider that with the re-assessment of the site based on accurate land values, and with more accurate costs in relation to abnormal costs (and taking into account a series of specific points made on the viability assessment - see representatives full response for detail - that the site would be found to be unviable with all the proposed costs taken into account. [Further detail provided in the representatives full response.]	The viability assessment should be re-run with more appropriate land values included.	Yes
051/35/LC/5	Ian Gilbert	Barton Willmore on behalf of H20 Urban LLP	Strategic Policies & Land Allocations DPD	Chapter 16	SG 12	N/A	LC	S	With regard to the Lancaster District Playing Pitch & Outdoor Sports Strategy, we support the assessment of the Carnforth Rangers FC site as a site at risk. We support the recognition within the report that proposed development in the locality provides an opportunity to relocate the club in relation to view and improved facilities. We agree with the KIP report where it states that the nature of future management of new improved facilities is yet to be established. We also agree that the opportunity provides the chance to deliver a broader and more centralised offer for outdoor sport in the area.  However, it is stressed that caution should be exercised in overcommitting the proposed allocations at SG11 and SG12 in terms of their ability to deliver financial contributions.	No suggested amendments made.	Yes
051/36/LC/5	Ian Gilbert	Barton Willmore on behalf of H20 Urban LLP	Strategic Policies & Land Allocations DPD	Chapter 16	SG 12	N/A	LC	S	We have no substantial points to make in relation to the Council's updated landscape evidence. We support that the proposed site allocations at SG11 and SG12 have not been identified for a local landscape designation. We have no objection to the identification of landscape buffer between Back Lane and the M6) as the site forms a key buffer site separating the motorway and the settlement with significant woodland habitat. It will be important for the Council to note the buffering effect that the site currently has between the motorway and the eastern edge of Carnforth and the extent to which that function will still continue as allocations for South Carnforth are brought forward.	No suggested amendments made.	Yes
122/08/SG12/LC/5	Tim Bettany - Simons	Canal and River Trust	Strategic Policies & Land Allocations DPD	Chapter 16	SG 12	N/A	LC	S	Criteria VII outlines that amongst other matters landscaping should seek to enhance the sites position on the canal. It is acknowledged that the topography rises from the canal and the site has a relatively narrow boundary with the canal, nonetheless it is considered that this policy should have the same aspiration as other position in terms of providing a positive inter-relationship with the canal that should be explored through future masterplanning work.  The trust support criteria XI in terms of protecting and enhancing the BHS, the trust also support the principle of criteria XV in terms of a pedestrian crossing. It is assumed that the site is expected to contribute towards the canal crossing from the SG11 site as opposed to an additional crossing however this should be clarified.	Criteria VII should be re-drafted to read:  Proposals should seek to maximise the waterside setting of this location and the opportunities this provides in terms of providing an attractive waterside frontage and include the submission of a suitable and appropriate landscaping plan that seeks to retain existing natural features, including the retention of trees and hedgerows and makes the best use of the topography on the site. If it can be demonstrated that a waterside frontage can't be provided then landscaping should seek to enhance the sites position along the Lancaster Canal.'  Paragraph 16.19 should be expanded to make explicit that the canal contributed to is via the SG11 site and not an additional crossing.	No
054/06/SG12/LC/US2-3	Chris Garner	Garner Planning on behalf of Russell Arner Ltd	Strategic Policies & Land Allocations DPD	Chapter 16	SG 12	N/A	LC	US/2 US/3	The interim SHELAA states that not all potential housing sites have been reviewed and remaining site assessments are currently ongoing and will be concluded for subsequent iterations of the SHELAA. If not all sites have been assessed then the City Council have not fully examined all other reasonable options for meeting its DAN or identified need for development. As a result exceptional circumstances have not been justified to amend Green Belt boundaries.	Before progressing the Local Plan, complete the assessment of other potential housing sites and determine whether there is a need to release land from the Green Belt. To meet housing requirements the authority will need to allocate additional housing sites regardless of any release of land from the Green Belt as explained in representation 050/2.	Yes
020/01/SG12/LC/US4	Marcus Hudson	Lancashire County Council (Minerals & Waste)	Strategic Policies & Land Allocations DPD	Chapter 16	SG 12	N/A	LC	US/4	Support was given to the inclusion of Criterion VII in Policy SG14 when originally consulted upon in January 2017 however this has now been removed. Its removal has effected the soundness of the plan and must be reinstated.	The reinstatement of Criterion VII as identified in the Draft Strategic Policies & Land Allocations DPD, consulted on in early 2017.	TBC

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Insert) ATTENDING EXAMINATION
118/02/SG12/NLCS/US4	Nick Horsley	Mineral Products Association	Strategic Policies & Land Allocations DPD	Chapter 16	SG 12	N/A	NLC/5	US/4	<p>The site would appear to impact upon known and proven mineral resources associated with Lundsfield Quarry which are clearly identified in the Lancashire Minerals and Waste Local Plan. It is acknowledged that sand and gravel resources in Lancashire are depleted.</p> <p>The proposed access directly onto Back Lane could prejudice the use of this lane for HGVs accessing and egressing Back Lane Quarry and its link to Junction 35 of the M6. The M6 Quarry Link Road was specifically built for this purpose and creating a residential access onto Back Lane would prejudice this objective. Back Lane Quarry produces over a million tonnes of limestone aggregates, asphalt and concrete products every year which are critical to regional infrastructure. With Back Lane Quarry having consent to 2048 and with the realistic option that further limestone resources would be released in the future for subsequent planning permission for deepening or lateral extensions to the site, bringing housing closer to these operations is clearly inappropriate.</p> <p>Policy SG12 is not sound because it is not consistent with paragraph 143 of the NPPF. Policy SG12 also conflicts with National Green Belt Policy and is contrary to the findings of the 2016 Green Belt Review. The City Council have failed in its responsibility to show mineral safeguarding on its Local Plan Policy Maps.</p>	Deletion of this site will ensure that the plan is sound in terms of the requirements of the NPPF as it applies to minerals safeguarding, the safeguarding of minerals infrastructure and the Green Belt.	Yes
053/01/CL16/LC/US2-3	Cllr Roger Mace	N/A	Strategic Policies & Land Allocations DPD	Chapter 16	SG 12	N/A	LC	US/2 US/3	<p>Concerns over the extent of the proposed development at SG12 have been raised at Parish Council meetings at the villages of Nether Kellet, Over Kellet and Arkholme. Back Lane is at this point the western boundary of the Kellet Ward, as Ward Councillor I consider this aspect of the plan to be unsound as the land lying immediately to the west of Back Lane are inappropriate for development and should be removed from the Local Plan. Reasons for this include that Back Lane is used for 24hr haul road for Back Lane Quarry which would impact on its use for quarry traffic and affect the visibility of the quarry. The fields lie in some places considerably lower than the level of the road, making access impracticable, he land plays a significant role in the North Lancashire Green Belt and the fields contain a watercourse at times of heavy rain. [Photographs are provided to supplement this representation.]</p>	Exclusion of the described elements of SG12 from the Local Plan.	Yes
030/02/SG12/NLCS/6/US2&4	Helen Binns	Walsingham Planning on behalf of KCS Development Ltd	Strategic Policies & Land Allocations DPD	Chapter 16	SG 12	N/A	NLC/6	US/2 US/4	<p>Strong objection to the allocation of land south of Windermere Road, Carnforth. The site lies within the North Lancashire Green Belt and its release from this designation is considered to be inappropriate, unsustainable and contrary to national planning policy. The delivery of this strategic site over the plan period is questionable given the numerous infrastructure constraints. The site is expected to deliver a large proportion of the housing requirement for Carnforth. It is my clients view that such a heavy reliance on one single site for deliver is inappropriate. Development of this site is not sustainable and is not well connected to existing services and infrastructure. [Further detail provided in the representatives full response.]</p>	To remove the housing allocation SG12 from the Local Plan.	No
055/13/SG13/LC/US2&4	Dan Mitchell	Barton Willmore on behalf of H20 Urban LLP	Strategic Policies & Land Allocations DPD	Chapter 16	SG 13	N/A	LC	US/2 US/4	<p>We object to the policy as drafted. The policy requirements are overly onerous and not compliant with paragraph 204 of the NPPF and will render the scheme unviable. The Council need to prepare a proper assessment of the viability of its sought requirements.</p> <p>No viability work or testing has been undertaken to the IDP. Only estimated costs (in some circumstances) have been provided alongside proposed sources of funding. No confirmed costs or delivery mechanisms for these are available. Indicative costs have been provided for education only, all of which have been caveated by further investigation is required.</p> <p>It remains our clients view that the IDP remains effectively a 'wish-list' by the Council and does not take into account any viability constraints associated with development delivery. It is clients view that Policy SG13 and the associated IDP is contrary to paragraph 173 and the scale of obligations proposed will affect and threaten development viability. [Further detail provided in the representatives full response.]</p>	No suggested amendment made.	Yes
122/09/SG13/16.24/LC/5	Tim Bettany - Simons	Canal and River Trust	Strategic Policies & Land Allocations DPD	Chapter 16	SG 13	16.24	LC	S	<p>The trust support the principle of criteria IV in terms of towpath improvements and a pedestrian bridge over the canal. We welcome the reference to an appropriate mechanism for future maintenance of the bridge.</p>	We would welcome paragraph 16.24 of the supporting text of this policy to be expanded to make reference to any bridges / structures would need to have consideration of the various navigational constraints. Furthermore, any crossings across the canal would require close liaison with the Trust in terms of design, height clearance and the carrying out of works.	No
105/01/SG13/LC/US2-3	Nicola Elsworth	Homes England	Strategic Policies & Land Allocations DPD	Chapter 16	SG 13	N/A	LC	US/2 US/3	<p>Homes England acknowledge the proposed policy SG13 which sets out the key requirements to support growth in South Camforth. We support the principle of securing contributions from SG11 and SG12 in a fair and equal manner. However, we would highlight that any contributions will need to be tested against site specific viability. [Further detail provided in the representatives full response.]</p>	We would request that the draft Policy SG13 is amended to align with the supporting paragraph 16.26 as the potential cost implications of this requirement will need to be considered in light of other policy requirements to ensure that the development of Lundsfield Quarry remains viable and deliverable. Supporting text to Policy SG13 should explain the rationale / need for contributions to secondary school provision at Baitrig Garden Village given the relative location of the Lundsfield Quarry site. Explicit reference within Policy SG13 to the need for contributions and on-site infrastructure to be considered alongside other policy requirements and having regard to site specific viability.	No
118/03/SG13/NLCS/US4	Nick Horsley	Mineral Products Association	Strategic Policies & Land Allocations DPD	Chapter 16	SG 13	N/A	NLC/5	US/4	<p>The proposed access directly onto Back Lane could prejudice the use of this lane for HGVs accessing and egressing Back Lane Quarry and its link to Junction 35 of the M6. The M6 Quarry Link Road was specifically built for this purpose and creating a residential access onto Back Lane would prejudice this objective. Back Lane Quarry produces over a million tonnes of limestone aggregates, asphalt and concrete products every year which are critical to regional infrastructure.</p> <p>Policy SG13 is not sound because it is not consistent with paragraph 143 of the NPPF. Policy SG13 also conflicts with National Green Belt Policy and is contrary to the findings of the 2016 Green Belt Review. The City Council have failed in its responsibility to show mineral safeguarding on its Local Plan Policy Maps.</p>	Deletion of this site as it applies to South Camforth will ensure that the plan is sound in terms of the requirements of the NPPF as it applies to minerals safeguarding, the safeguarding of minerals infrastructure and the Green Belt.	Yes
118/03/SG13/NLCS/US5	Nick Horsley	Mineral Products Association	Strategic Policies & Land Allocations DPD	Chapter 17	SG 14	N/A	NLC/6	US/5	<p>The proposed access directly onto Back Lane could prejudice the use of this lane for HGVs accessing and egressing Back Lane Quarry and its link to Junction 35 of the M6. The M6 Quarry Link Road was specifically built for this purpose and creating a residential access onto Back Lane would prejudice this objective. Back Lane Quarry produces over a million tonnes of limestone aggregates, asphalt and concrete products every year which are critical to regional infrastructure.</p> <p>Policy SG13 is not sound because it is not consistent with paragraph 143 of the NPPF. Policy SG13 also conflicts with National Green Belt Policy and is contrary to the findings of the 2016 Green Belt Review. The City Council have failed in its responsibility to show mineral safeguarding on its Local Plan Policy Maps.</p>	Deletion of this site as it applies to South Camforth will ensure that the plan is sound in terms of the requirements of the NPPF as it applies to minerals safeguarding, the safeguarding of minerals infrastructure and the Green Belt.	Yes
118/06/SG11&SG12&SG13&SG5&H1/NLCS/US1-4	Nick Horsley	Mineral Products Association	Strategic Policies & Land Allocations DPD	Chapter 16 Chapter 23 Chapter 20	SG 11 SG 12 SG 13 SCS H1	N/A	NLC/5	US/1 US/2 US/3 US/4	<p>We maintain our robust objection to the proposed plan in relation to the planned housing allocations on land safeguarded for mineral resources and in close proximity to important quarrying operations near Carnforth.</p> <p>Having viewed the Transport Assessment we feel this document is flawed for a number of reasons. The vehicle flows in the assessment do not appear to take account a disproportionately higher level of HGV movements associated with the quarrying activities at these junctions. The assessment appears to have overlooked the fact that extraction from the Dunsill Mill Quarry at Nether Kellet is currently mothballed at present. With reserves remaining, the quarry could reopen at any time increasing vehicular flows in the locality. Furthermore the assessments does not predict the likely increases in vehicle movements from the Kellet Quarries as other sources of supply in Yorkshire and South Lakeland become exhausted. Back Lane Quarry has a planning permission which currently expires in 2048 with a further recognised mineral resource which is of regional importance. [Further detail provided in the representatives full response.]</p>	No further suggestions made.	Yes
004/02/SG14/LC/5	Hannah Bevins	National Grid Amec Foster Wheeler E&I U on behalf of National Grid	Strategic Policies & Land Allocations DPD	Chapter 17	SG 14	N/A	LC	S	<p>This allocation is within close proximity of National Grid infrastructure and due consideration should be given to any impacts arising from new development. [Further detail provided in the representatives full response.]</p>	No suggested amendments made	No
028/06/SG14/NLCS&4/US1-4	Elizabeth Knowles	Natural England	Strategic Policies & Land Allocations DPD	Chapter 17	SG 14	N/A	NLC/3 NLC/4	US/1 US/2 US/3 US/4	<p>Natural England consider the plan unsound and non-compliant with the Conservation of Habitats and Species Regulations 2017 (as amended). Our concerns specifically relate to Local Plan Policy SG14 Imperial Road / Port of Heysham Expansion.</p> <p>There has been confusion on whether the helpad site that forms part of the allocation site SG14 is to be included in the final version of the allocation or not. NE have been of the view since the early stages of the plan that the helpad site would not form part of the allocation and have provided advice to date on this basis.</p> <p>The Heysham helpad water roost site and adjacent sea wall is a high tide roost site. This site is functionally linked to the Morecambe Bay &amp; Duddon Estuary SPA and Morecambe Bay Ramsar site and holds internationally important numbers of wading birds. Given its importance as a functional site for SPA birds, the site is afforded great weight and protection as outlined by the NPPF.</p> <p>As the helpad site is currently included in the site allocation SG14 and will now form part of the Examination process, NE raises a soundness objection on the basis that this option is not compliant with national planning policy, its not demonstrated to be effective nor has been justified when considered against the alternatives. Furthermore the mitigation solutions presented in Appendix D of the Local Plan are only acceptable under the scenario of the helpad roost being outside of the allocation. The mitigation measures are not sufficient when considering the helpad roost site being within the allocation itself. We also raise legal compliance concerns in respect to the Habitats Regulations as currently the HRA and Local Plan are not consistent. [Further detail on this matter is contained in the full response.]</p>	<p>The concerns outline can be overcome with the removal of the helpad roost site from the site allocations proposal map. The HRA would then need to be updated to ensure the proposed mitigation presented in Appendix D is reflected in the HRA in order to record the final determination of no adverse effect on site integrity.</p> <p>If the helpad roost is to remain in the site allocation, the HRA should be updated to fully assess the implication of including it within the development allocation, applying mitigation to ensure no adverse effect on integrity. The outcomes would need to be reflected in the Local Plan. However, there is no evidence to date to suggest how this site could accommodate development without harm to the SPA and Ramsar site. As such we recommend the solution presented above to remove it from the development policy is the preferred approach.</p>	No
028/02/SG14/LC/US2-3	Janet Baguley	Natural England	Strategic Policies & Land Allocations DPD	Chapter 17	SG 14	N/A	LC	US/2 US/3	<p>The Local Plan Policies Map that forms part of this consultation includes an important SPA bird roost (Heysham Helpad) as part of the allocation for Policy SG14. Development on this roost site would have an adverse impact on Morecambe Bay SPA as it is known to be functionally linked land.</p>	<p>The Heysham Helpad area should be removed from the allocation in relation to Policy SG14.</p> <p>Soundness could also be improved further if the wording in the HRA was amended to state that there would be no likely significant effect only if the proposed mitigation to minimise (i.e. the removal of this area from SG14) is put in place.</p>	No
160/02/CL17/LC/5	David Adams	Avis PED Ltd	Strategic Policies & Land Allocations DPD	Chapter 17	SG 15	N/A	LC	S	<p>We support the inclusion of the text in paragraph 17.15 which recognises that the land at the Port of Heysham and wider Heysham Gateway has been identified for large and smaller scale built waste management facilities.</p> <p>Policy SG15 relates to Heysham Gateway and confirms that a Development Brief is being prepared. We are supportive of a Development Brief and would look to assist the Council where possible in its preparation. We believe that to deliver the vision for the area that proposals for suitable uses (outside B type uses) should be supported by the Council.</p>	No suggested amendments made.	Yes
010/02/SG15/LC/US3-4	David Dunklop	Wildlife Trust for Lancashire, Manchester & North Merseyside	Strategic Policies & Land Allocations DPD	Chapter 17	SG 15	N/A	LC	US/3 US/4	<p>We are disappointed that the Council's ecological adviser has not been asked to conduct an advance ecological appraisal of this proposed allocation. Whilst we welcome the broad thrust of criterion II of this policy, inasmuch as this affords particular protection of the Local Nature Reserve we must lodge a grounds of objection on the grounds of omission of policy reference to significant constraints and failure to address related ecological network issues. The policy as worded fails to address the wider ecological network in context to the allocation site and the opportunities that development afford to preserve, conserve, restore and recreate priority habitats, ecological networks and protection and recovery of priority species.</p>	<p>We would wish to see the following amendment and addition to criterion II. 'Proposals should seek to protect areas which have important biodiversity value, in particular Middleton Woods Local Nature Reserve – a part of Middleton Former Refinery Site of Biological Heritage Site, and where possible provide improvements to the nature reserve in terms of management security and access.'</p> <p>Additional text is also supplied by the representative which should be including into the policy which seeks to be deliver positive benefits to biodiversity through the restoration, enhancement of habitats.</p> <p>[Full version of the suggested text found in the Full Representation from the Wildlife Trust.]</p>	Yes
010/05/SG15/NLCS/US2&3&5	Kim Wisdom	Wildlife Trust for Lancashire, Manchester & North Merseyside	Strategic Policies & Land Allocations DPD	Chapter 17	SG 15	N/A	NLC/5	US/2 US/3 US/5	<p>We are disappointed that the additional evidence does not include evidence supporting the proposed Policy SG15 in relation to the Heysham Gateway. We reiterate our concerns that this allocation, within the Morecambe Bay Nature Improvement Area remains unsupported by evidence of the overriding need for development at this location, how a sustainable drainage system will avoid degrading the identified local wildlife site within the allocation, how both needs if demonstrated would override the constraints associated with proposed policy EN9 and adopted policy DM27 in connection with the protection and enhancement of the populations of specially protected species.</p> <p>As far as we can ascertain, there is no evidence that a comprehensive assessment of the biodiversity baseline for this allocation policy has been established, nor that the appropriate hierarchy of avoidance, mitigation and compensation has been followed in selecting this allocation. We therefore consider the plan to be unsound in its current form.</p>	Further evidence should be provided to support the allocation at SG15 as described.	Yes
048/01/SG14&EC2/LC/5	Warren Marshall	Peel Ports Group	Strategic Policies & Land Allocations DPD	Chapter 17 Chapter 18	SG 14 EC 02	N/A	LC	S	<p>We would like to confirm that we are happy with and support the policies which cover the Port of Heysham via Policy SG14 and the future expansion opportunities in Policy EC2. Together the policies help to further promote the area of the Port as an essential economic driver for the area. With regard to SG14, land at EC1.6 is our preferred expansion land identified by us via previous responses to the plan. The land which has been identified to the east of the Port would be seen by us to have a support function but not able to be directly assimilated into the Port.</p>	No suggested amendments made.	No
048/02/SG14&EC2/LC/5	Warren Marshall	Peel Ports Group	Strategic Policies & Land Allocations DPD	Chapter 17 Chapter 18	SG 14 EC 02	N/A	LC	S	<p>For the avoidance of doubt we would wish to re-iterate our full support to Policy SG14 in relation to the Port of Heysham. However, we object to any proposed alteration to the Land Allocations DPD which would remove land at Heysham Helpad from the proposed employment allocation.</p> <p>The land in question forms part of our operational port estate and has a long established use as a helpad for the purposes of off-shore support. We therefore consider any proposed deletion of this allocation by the Local Planning Authority to be ultra vires given its authorised use.</p>	No suggested amendments made.	No
004/03/LC/5	Lucy Bartley	National Grid Wood E&I Solutions UK Ltd on behalf of National Grid	Strategic Policies & Land Allocations DPD	Chapter 17 Chapter 18 Chapter 20	SG14 EC1.10 H2.9	N/A	LC	S	<p>The statutory safety clearances between overhead lines, the ground and built structures must not be infringed. To comply with statutory safety clearances the live conductors of National Grid's overhead powerlines are designed to be a minimum height above the ground to provide a ground level clearance. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can on request provide to developers detailed line profile drawings that detail the height of conductors.[Further detail is provided in the full response.]</p>	No suggested amendments made.	No
198/01/EC1/NLCS/US1-3	Mark Aylward	ATP on behalf of Derwent Holdings	Strategic Policies & Land Allocations DPD	Chapter 18	EC 01	N/A	NLC/5	US/1 US/2 US/3	<p>Policy EC1.15 which relates to Lancaster Business Park, as worded, assumes or implies that the subject land has consistently been an 'office development' site over an extended period. In reality, the allocations from the current Plan and the extant consent for the subject land are mixed employment included B1 and B8. The Plan's proposed wording for this site is inconsistent with what can be achieved through existing consents and is therefore not positively prepared. [Further detail provided in the representatives full response.]</p>	We would encourage that the site-based policy be reworded to provide more flexibility and include the opportunity for enabling development to provide the quality of accommodation and facilities to attract a target market so that the residual land left at Lancaster Business Park is genuinely deliverable over the Plan period.	Yes
051/14/EC1/LC/5	Dan Mitchell	Barton Willmore on behalf of H20 Urban LLP	Strategic Policies & Land Allocations DPD	Chapter 18	EC 01	N/A	LC	S	<p>Our client continues to support the continued growth and development within Camforth and the wider area to help support and boost opportunities for economic growth. It is noted that some amendments have been made to some of the employment allocations made across the district since the draft Local Plan consultation.</p>	No suggested amendments made.	Yes
167/11/EC1/LC/US1&3	Hannah Walker	Barton Willmore on behalf of SCP Consulting Ltd	Strategic Policies & Land Allocations DPD	Chapter 18	EC 01	N/A	LC	US/1 US/3	<p>Our client notes that the opportunities for new development on sites EC1.2, EC1.3, EC1.4 and EC1.5 are limited. Each of these sites are constrained by existing development or infrastructure. Consequently local businesses are unable to grow and stay in Camforth due to lack of site suitable to meet their needs. Whilst there is land at Camforth Business Park this is not being actively marketed.</p>	For the Council to achieve its aspirations for Camforth to be a thriving town in North Lancashire and South Cumbria Policies SP5 and EC2 should seek to allocate new employment land within Camforth. This will also ensure that a reasonable choice of sites for business and developers to allow for delays for other sites coming forward.	Yes
160/03/CL18/LC/US2-3	David Adams	Avis PED Ltd	Strategic Policies & Land Allocations DPD	Chapter 18	EC 01 EC 05	N/A	LC	US/2 US/3	<p>Policy EC1 sets out the established employment areas across the district and support the role of B class uses in these areas. Waster uses are widely accepted as sui generis and therefore not incorporated under the traditional B employment use. In order for the DPD to be sound and justified these types of uses should also be recognised within the policy.</p> <p>Policy EC5 sets out the regeneration priority areas in accordance with paragraph 156 of the NPPF. This policy should be amended to provide flexibility for alternative schemes to come forward presenting opportunities to support employment uses, attract other businesses to the area and contribute positively to regeneration. Therefore whilst the allocation is supported Policy EC5 should be amended to make reference to the Waste and Minerals Local Plan.</p>	<p>Policy EC1 should be amended to allow greater flexibility for those sites and uses which are allocated and brought forward through the waste and minerals local plan. The policy should be amended to ensure that it is justified and effective in accordance with NPPF.</p> <p>The allocation of Heysham Gateway within Policy EC5 is supported, however for consistency and clarity the Policy and supporting text should be amended to make reference to the Waste and Minerals Local Plan.</p>	Yes

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Intend) ATTENDING EXAMINATION
004/01/EC1.10/LC/5	Hannah Ilevins	National Grid Amec Foster Wheeler E&I U on behalf of National Grid	Strategic Policies & Land Allocations DPD	Chapter 18	EC 01.10	N/A	LC	S	This allocation is within close proximity of National Grid infrastructure and due consideration should be given to any impacts arising from new development. [Further detail provided in the representatives full response.]	No suggested amendments made.	No
028/02/EC1.12/LC/5	Janet Baguley	Natural England	Strategic Policies & Land Allocations DPD	Chapter 18	EC 01.12	N/A	LC	S	The HRA assessment of the allocation at White Lund Employment Area identifies the possibility that land to the south could be functionally linked to Morecambe Bay SPA but this issue has not been included in the policy or the supporting text.	In order to improve soundness we recommend that this issue should be highlighted and that a project level HRA may be necessary.	No
148/11/EC2/LC/5	Jon Power	CBRE on behalf of Lancaster University	Strategic Policies & Land Allocations DPD	Chapter 18	EC 02	N/A	LC	S	The University consider that Policy EC2 should make reference to the implementation of the Health Innovation Campus. Additional reference should be made within policy text to ancillary education-linked uses given the strong linkages between the Health Innovation Campus and the University. Associated ancillary uses could include an on-site cafe, other staff and student wellbeing and other facilities to support the delivery of a successful Innovation Campus. The University support the Council aspiration that no B1 or B8 uses are acceptable or appropriate in this location.	Further reference should be provided in Policy EC2 which provides greater flexibility in uses, reflecting the strong linkages between the Innovation Campus and the University.	Yes
147/01/EC2/LC/US1-2	Alice Weston	Knights Professional Services	Strategic Policies & Land Allocations DPD	Chapter 18	EC 02	N/A	LC	US/1 US/2	The Plan's strategy, informed by the Council's own evidence via the Employment Land Review 2015, requires land to be identified to meet B1 office uses. The development of this site at Halton Road / Bay Gateway would align well with the strategic objectives of the plan and the evidence which underpins it by securing a balanced portfolio of land in the district and helping to improve employment mix. Given this site is ideally placed in delivering the Council's overall strategy and yet it is omitted from Policy EC2 we consider the plan is not justified. [Further detail provided in the representatives full response.]	Policy EC2 should include the allocation of the site at Halton Road / Bay Gateway for employment uses.	Yes
169/11/EC2/LC/US1-3	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Strategic Policies & Land Allocations DPD	Chapter 18	EC 02	N/A	LC	US/1 US/2 US/3	Despite references to South Lancaster Business Park at Policy SP5, no allocation of employment land is proposed in Policy EC2. It is unsound to include such a vague commitment within Policy SP5 and EC2 given that the identification of South Lancaster Business Park as a formal allocation cannot be justified.	References to the business park should be omitted from the DPD, and any potential employment land within the Garden Village can be properly explored through the preparation of a masterplan in conjunction with landowners and developers.	
009/01/EC3/LC/5	Catherine Newton	Bell Ingram	Strategic Policies & Land Allocations DPD	Chapter 18	EC 03	N/A	LC	S	Policy EC3 sets out the need for the site to be allocated and clearly identifies a number of constraints which will need to be addressed as they will have an impact on the design and layout of new development. Comments have been raised in previous rounds of consultation over the presence of the North West Ethylene Pipeline which passes through the site allocation East – West. We have never received any acknowledgement that the pipeline interests have been taken into account when allocating this or any other sites in the Proposed Plan.	We seek the Council's confirmation that during the process of preparing the Plan that the Council have been aware of the HSE requirements for the pipeline which passes through the EC3 allocation. We would again suggest that in this instance it would also be appropriate to include the route of the pipeline on the Local Plan Policies Map and/or identified along with other relevant considerations within the wording of Policy EC3.	No
122/10/EC3/LC/5	Tim Bettany - Simons	Canal and River Trust	Strategic Policies & Land Allocations DPD	Chapter 18	EC 03	N/A	LC	S	The Trust support criteria II in terms of landscaping to mitigate the impact on Galgate Marina and the setting of the canal, criteria IV to protect and enhance the BHS, criteria V to ensure drainage proposals to not have a detrimental effect on the canal and criteria VIII in contributing to improving cycling and walking links along the canal.	No suggested amendments made.	No
109/01/EC3/18.36&18.39/LC/US1-4	Claire Pegg	Cushman & Wakefield on behalf of the L&K Group Plc	Strategic Policies & Land Allocations DPD	Chapter 18	EC 03	18.36 18.39	LC	US/1 US/2 US/3 US/4	We note that the DPD continues to make reference that ancillary business at the site must be based around and support the agricultural industry. As set out in representations to the draft Local Plan in 2017 this is not acceptable to L&K as the long term viability and sustainability of the Agri-Business Centre requires other complementary businesses that will although likely, not necessarily be related to the agricultural industry. We would refer to the positive impact that the L&K scheme at Junction 36 has had on the local area. The inclusion of complementary businesses is crucial to ensure development is deliverable. We note that previous requests to provide alterations to the boundary have not been reflected in the Local Plan, the allocation boundary should seek to include further land to the north-east and south-west of the site, including all the existing farm buildings and Grade II Listed Farm house fronting onto Preston / Lancaster Road (A6). [Further detail provided in the representatives full response.]	The wording of Policy EC3 and supporting text to include complementary businesses not necessarily related to the agricultural industry to ensure the long term viability of the Agri-Business Centre and a revision of the Local Plan Policies Map to include all of the land up to the Preston / Lancaster Road including the Listed Buildings and entire farm complex.	Yes
171/02/EC3/LC/US3	Anne Windsor	N/A	Strategic Policies & Land Allocations DPD	Chapter 18	EC 03	N/A	LC	US/3	If the development of such a comprehensive rural employment hub was within the Garden Village proposal wouldn't this be more in keeping with the concept of a Garden Village? This should be given due consideration.	No suggested amendments made.	No
051/15/EC5/LC/5	Dan Mitchell	Barton Willmore on behalf of H20 Urban LLP	Strategic Policies & Land Allocations DPD	Chapter 18	EC 05	N/A	LC	S	Central Camforth continues to be identified as a regeneration priority area which is supported by our client. It is noted that this includes reference to connectivity linkages between our clients site and the town centre which is a principle which is supported.	No suggested amendments made.	Yes
167/12/EC5/LC/US1&3	Hannah Walter	Barton Willmore on behalf of SCP Consulting Ltd	Strategic Policies & Land Allocations DPD	Chapter 18	EC 05	N/A	LC	US/1 US/3	Our client support the Council's ambitions to regenerate Camforth as an attractive place to work and live. The brand association of Porsche with the town will act as a catalyst for regeneration within the town.	To support sustainable economic growth in Camforth the Council must allocate new employment land within the Local Plan. This will act as a catalyst for regeneration of the town centre to allow Camforth to continue to be an attractive place for people to live and work.	Yes
080/02/18.07/NLC4-5/US1-4	Janet Taylor	Friends of Denny Beck	Strategic Policies & Land Allocations DPD	Chapter 18	EC 05	18.67	NLC/4 NLC/5	US/1 US/2 US/3 US/4	Flood defences on the River Lune are highly unsound. The proposed flood wall will cost millions and then have regular maintenance. It is not a guaranteed solution and could be overtopped. There is concern that if the proposed wall goes ahead the increase risks in the Halton / Denny Beck area and create a bottleneck. [Further detail provided in the representatives full response and supplementary documentation.]	Remove the flood wall from the plan. Hard engineering on this scale is an issue.	Yes
165/01/EC5/LC/US1-4	Ryan McEggart	GL Hearn on behalf of Travis Perkins	Strategic Policies & Land Allocations DPD	Chapter 18	EC 05	N/A	LC	US/1 US/2 US/3 US/4	Travis Perkins generally support the wording of Policy EC5 given it support the redevelopment of the area for uses such as residential. Travis Perkins would only caution on the wording within the supporting text which requires comprehensive development of these sites given they are in multiple ownerships.	The Council need to be clear that the proposed wording will be effective and justified. Currently there is no evidence which has been provided to demonstrate this.	Yes
148/12/EC6-7/LC/5	Jon Power	CBRE on behalf of Lancaster University	Strategic Policies & Land Allocations DPD	Chapter 18	EC 06 EC 07	N/A	LC	S	Lancaster University fully supports these policies, however given the significance of Lancaster University as the district's largest higher education provider and its contribution to the economic output of Lancaster, the University requests a university site-specific policy for the University Campus. A Lancaster University Policy would ensure that the Plan clearly provides in planning policy support for the University.	It is recommended that a new site-specific policy for Lancaster University be included within the plan, the new policy should support sustainable growth of the University Campus where it accords with planning policy, the development of a masterplan / framework for the wider University campus and appropriate developments within an expanded Lancaster University Campus.	Yes
109/04/EC3&H5/LC/US1&3	Claire Pegg	Cushman & Wakefield on behalf of the L&K Group Plc	Strategic Policies & Land Allocations DPD	Chapter 18 Chapter 20	EC 03 H 05	N/A	LC	US/1 US/3	The transport assessment identifies that a strategic model has not been used to take account of the proposed highway infrastructure, which would have a significant impact on the traffic flows and congestion on routes across Lancaster. This is considered appropriate to assess the impact of the Local Plan for the 2023 assessments because the proposed major infrastructure is unlikely to be fully implemented by this point. It is not, however, considered appropriate or representative for the 2023 assessments, meaning that any assessment on this basis is unlikely be representative of the condition in future year scenarios. It is unclear whether the Council have taken into account any strategic transport work which would occur as part of any planned infrastructure works, such as the improvement to junction 33 of the M6. This should be clarified because one interpretation is that this indicates that in conducting the assessment in this way means the Council do not consider the proposed homes at Wyresdale Road and the Agri-Business Park to be reliant on any of this strategic infrastructure. [Further detail provided in the representatives full response.]	No suggested amendments made.	Yes
147/05/EC3&EN&LC/US2&4	Matthew Wedderburn	Knights Professional Services	Strategic Policies & Land Allocations DPD	Chapter 18 Chapter 22	EC 02 EN 08	N/A	LC	US/2 US/4	We wish to stress that our clients wish to see this land north of Lancaster removed from the Green (as is proposed by the Plan) and are proposing to bring forward this site for high quality employment use and therefore which to see land north of Halton Road, Lancaster identified for such purposes under Policy EC2. As stated in our original representations, our clients consider that the plan is unsound as a result of the omission of the site from Policy EC2 and its inclusion as an Area of Separation under Policy EN8. We do not believe there is sufficient evidence to justify its inclusion under Policy EN8 and in ignoring opportunities for economic growth the Plan is not consistent with national planning policy. [Further detail provided in the representatives full response.]	Policy EC2 should include the allocation of the site at Halton Road / Bay Gateway for employment uses. Policy EN8 should be removed from the Local Plan	Yes
051/16/7C1/LC/5	Dan Mitchell	Barton Willmore on behalf of H20 Urban LLP	Strategic Policies & Land Allocations DPD	Chapter 19	TC 01	N/A	LC	S	Policy TC1 identifies Camforth as a market town and a key service centre which does not align to Policy SP2.	Consistency of terminology is required between Policies SP2 and TC1.	Yes
168/12/7C1/LC/US5.1&3	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Strategic Policies & Land Allocations DPD	Chapter 19	TC 01	N/A	LC	US5.1 US/3	We welcome the allocation of a new urban local centres within the retail hierarchy but note that the scale and locality of the size of centre is still being considered by the Council, including whether the provision comprises a single local centre or two separate allocations. In light of the evidence base which accompanies the Local Plan and the current retail hierarchy there is clearly a lack of significant convenience retailing provision to the south of the River Lune. On this basis the new facilities at Bailrigg Garden Village should be of a District Centre scale in order to ensure that it is sufficient to meet existing and forecast need for residents. Without such modifications Policy TC1 is considered unsound.	Clarification should be provided that the centre in Bailrigg Garden Village should be at a district centre scale, not a local centre.	Yes
100/13/7C1/LC/5	David Barnes	Star Planning on behalf of Seemore Properties Ltd	Strategic Policies & Land Allocations DPD	Chapter 19	TC 01	N/A	LC	S	The principle of the creation of a new local centre to part of the East Lancaster Strategic Site is supported.	No suggested amendments made.	Yes
163/10/7C1/LC/5	David Diggle	Turley on behalf of Peet Holdings Investments	Strategic Policies & Land Allocations DPD	Chapter 19	TC 01	N/A	LC	S	Peet supports the recognition within the Plan of the important role that the proposed development at the Garden Village will have in the delivery of community infrastructure.	No suggested amendments made	Yes
155/07/7C1.12/LC/5	Paul Nellist	HOW Planning on behalf of Taylor Wimpey	Strategic Policies & Land Allocations DPD	Chapter 19	TC 01.12	N/A	LC	S	Taylor Wimpey supports Policy TC1.12 of the DPD which limits the local centre in scale to meet localised need. Taylor Wimpey consider that the DPD should maintain the local centre limited to a scale to meet localised need which does not impact on the function and vitality of other centres in the locality.	No suggested amendments made.	Yes
168/13/7C1/LC/5	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Strategic Policies & Land Allocations DPD	Chapter 19	TC 03	N/A	LC	S	We welcome the Council's statement within Policy TC3 that they will support the development of a foodstore in Bailrigg Garden Village in accordance with Policy SG1. Such facilities will be crucial to ensure that the Garden Village develops a sustainable community and a latent qualitative deficiency in convenience retailing in South Lancaster.	No suggested amendments to make.	Yes
106/02/H1/LC/US1-4	Craig Barnes	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 20	H 01	N/A	LC	US/1 US/2 US/3 US/4	Barton Willmore on behalf of Storey Homes have provided full and detailed submissions in relation to land at Ashton Road, Lancaster. Due the scale and detail of the representation received these have not been summarised and can be viewed in full only.	Suggested wording and recommended amendments are provided within the representatives full response.	Yes
054/07/H1/LC/US3	Chris Garner	Garner Planning on behalf of Russell Armer Ltd	Strategic Policies & Land Allocations DPD	Chapter 20	H 01	N/A	LC	US/3	The sites are not clearly marked on the proposals map because the reference numbers don't match the policy. It is extremely difficult to relate this table to the table in Policy SP6. The same site can have different references and a different site location. It is difficult to determine where the sites identified in H1 appear in SP6. A total of 6,938 dwellings is indicated but this includes the whole of Bailrigg Garden Village which will not deliver 3,500 within the plan period, therefore the 6,938 is totally misleading. The strategic sites will not deliver the suggested number of dwellings in the plan period. More smaller sites should be identified that can be built quickly by small and medium sized house builders.	Prepare a table which relates to consistent site references and site locations throughout. Prepare a table that has totals and sub-totals that can be identified in Policy SP6 and housing trajectory. The planning authority should complete the SHELAA and identify all sites above a certain size threshold which are considered suitable for housing development.	Yes
165/03/H1/LC/US1-4	Ryan McEggart	GL Hearn on behalf of Travis Perkins	Strategic Policies & Land Allocations DPD	Chapter 20	H 01	N/A	LC	US/1 US/2 US/3 US/4	Given the five planning application on D054 which is seeking up to 263 residential units and this only covers part of the Lune Industrial Estate, it is suggested that the capacity is increased in Policy H1 to circa 300 dwellings. It should be acknowledged that these figures are considered to be minimums and not maximums to ensure a sufficient supply of dwellings in light of the significant uplift in housing identified in the housing trajectory.	Increate the capacity for housing identified in Policy H1 for the Lune Industrial Estate to circa 300 dwellings.	Yes
158/02/H1/LC/US1&2&4	Stuart Booth	JWPC Planning on behalf of Mr Needham	Strategic Policies & Land Allocations DPD	Chapter 20	H 01	N/A	LC	US/1 US/2 US/4	This land at Fair View, Torrisholme is referenced in the new SHELAA as developable and in the Landscape Survey as neutral in terms of harm and cumulative impact. The information in the Landscape, Townscape and Visual Field Survey would seem to contradict this statement in the SHELAA. The site could be readily developed with little impact on the wider area or unduly harmful impact upon the setting of Torrisholme Barrow. We maintain our submission that the site should be allocated for residential development in the Local Plan.	The land at Fairview should be allocated for residential purposes in the Local Plan.	Yes
119/05/H1/NLC5/US4	Nick Horsley	Mineral Products Association	Strategic Policies & Land Allocations DPD	Chapter 20	H 01	N/A	NLC/5	US/4	Policy H1 is misleading in that it states that planning permission exists for housing within a minerals safeguarding area. Planning permission has now expired at Lundsfield Quarry. The Sustainability Appraisal recognises the need to take into consideration minerals issues yet neither plan or appraisal gives sufficient consideration to the safeguarding of minerals. Housing development on this land would conflict with national and local policy as it applies to Green Belt and Minerals Safeguarding.	Deletion of the reference to Lundsfield Quarry will ensure that the plan is sound in terms of the requirements of the NPFF as it applies to minerals safeguarding, the safeguarding of minerals infrastructure and the Green Belt.	Yes
124/04/H1/LC/US1-4	Michael Gilbert	Peter Brett Associated on behalf of Hurstwood Holdings	Strategic Policies & Land Allocations DPD	Chapter 20	H 01	N/A	LC	US/1 US/2 US/3 US/4	Proposed Policy H1 makes clear that the Council will support the development of a number of identified sites for residential purposes. We fully endorse the proposed allocation of the Lune Industrial Estate for residential purposes and can confirm the land represents an important brownfield opportunity. However, we consider the indicative capacity is too low and that the allocation should be for approximately 250 dwellings.	The indicative capacity for the site should be raised to 250 dwellings.	Yes
103/03/H1/LC/US1	Daniel Hughes	PWA Planning on behalf of Oakmere Homes	Strategic Policies & Land Allocations DPD	Chapter 20	H 01	N/A	LC	US/1	The Local Plan is based on the delivery of large strategic sites which have a number of infrastructure requirements which must be addressed within the Policy. It is considered that the inclusion of further non-strategic sites would deliver housing in the shorter term which are not restricted by infrastructure constraints. These should be included in Policy H1. This will help ensure that housing does come forward at the right time and in the right place. In this regard land to the west of Watery Lane (as identified in representation) would meet these requirements and should be included in Policy H1. [Further detail provided in the representatives full response.]	Land to the West of Watery Lane should be included in a residential allocation under Policy H1.	Yes
135/02/H1/US1-4/LC	Graham Love	Smith & Love Planning on behalf of Oakmere Homes	Strategic Policies & Land Allocations DPD	Chapter 20	H 01	N/A	LC	US/1 US/2 US/3 US/4	Our clients land to the east of Fulwood Drive, Bare can make a valuable contribution to boosting housing supply and specifically the supply for Morecambe. The site is available now, a suitable location for development and able to deliver within the first five years of the plan. [Further detail provided in the representatives full response.]	In the event that the Slynw-with-Hest Neighbourhood Plan does not progress in time the City Council has to resume responsibility for local planning in this area and the land to the east of Fulwood Drive should be added to Policy H1 for 240 dwellings.	Yes
135/07/H1/LC/US1-4	Graham Love	Smith & Love Planning on behalf of Oakmere Homes	Strategic Policies & Land Allocations DPD	Chapter 20	H 01	N/A	LC	US/1 US/2 US/3 US/4	Oakmere maintains its objections set out in regard of land to the East of Fulwood Drive and its omission from Policy H1 of the Local Plan. Oakmere have reviewed the 2018 SHELAA and are pleased to note that it supports development within the northern parcel of the site. Oakmere homes have now undertake a wide variety of evidence which supports development of this site, including an illustrative masterplan, landscape and visual appraisal, heritage appraisal, transport appraisal, ecology appraisal and drainage & flood risk appraisal (these are provided as part of the responders full representation) which support the development of this site. The failure of the Local Plan to plan for and provide sufficient new housing is a key concern and it is not sound without further modification to ensure that all, or certainly substantially more, of the identified housing need is met. [Further detail provided in the responders full response.]	The Local Plan should include (and facilitate the Neighbourhood Plans to include) a greater range of non-strategic housing allocations which can be delivered quickly in the early part of the plan period without the need for significant infrastructure. Oakmere Homes has put forward land to the east of Fulwood Drive for inclusion in the Slynw-with-Hest Neighbourhood Plan as a site allocation with the capacity for approximately 140 new dwellings to meet identified needs of Morecambe which cannot be solely met by regeneration in the town. In the event that Slynw-with-Hest do not progress in time with the examination of the Local Plan, the City Council has to resume responsibility for the local planning of the neighbourhood plan area. As a result this site should be identified under Policy H1 of the Strategic Policies & Land Allocations DPD.	Yes
100/10/H1/LC/5	David Barnes	Star Planning on behalf of Seemore Properties Ltd	Strategic Policies & Land Allocations DPD	Chapter 20	H 01	N/A	LC	S	Seemore Properties support the identification of the East Lancaster Strategic Site and former Ridge Lea Hospital under Policy H1. Seemore Properties note that some 900 and 70 dwellings respectively are anticipated to be delivered through the plan period, the final capacity will inevitably be determined via a masterplanning exercise undertaken during the preparation of a planning application.	No suggested amendments made.	Yes
049/03/H1/LC/US1&3&4	Chris Middlebrook	Steven Abbott Associates	Strategic Policies & Land Allocations DPD	Chapter 20	H 01	N/A	LC	US/1 US/3 US/4	In the draft Local Plan the land at Bowerham Lane was included for residential purposes but has now been removed. It is recommended that for consistency the land at Bowerham Lane is re-identified in the plan for housing to reflect the current planning status of the site.	Amend Policy H1 to include the site at Bowerham Lane as an allocation for 25 houses.	Yes
030/01/H1/NLC5/US1-4	Helen Binns	Walsingham Planning on behalf of KCS Development Ltd	Strategic Policies & Land Allocations DPD	Chapter 20	H 01	N/A	NLC/5	US/1 US/2 US/3 US/4	Policy H1 identifies two housing sites in Camforth, land to the South of Wethermere Road and land at Lundsfield Quarry. Both are challenged sites and delivery is not expected in the short term. There is a need to identify further land in the Camforth area for housing which is not constrained and can deliver housing in the first few years of the plan. Specifically, it is considered that land to the east of Scotland Road should be allocated and identified in Policy H1 for housing. The site is approximately 17 hectares and could deliver up to 238 dwellings. [Further detail provided in the representatives full response along with supplementary information on the land East of Scotland Road.]	Land to the East of Scotland Road, Camforth should be allocated for housing and identified under Policy H1.	Yes
051/17/H1-2/LC/US3	Dan Mitchell	Barton Willmore on behalf of H20 Urban LLP	Strategic Policies & Land Allocations DPD	Chapter 20	H 01 H 02	N/A	LC	US/3	Policies H1 & H2 identify the sources of supply on allocated sites in both the urban and rural area. We have a number of concerns over this approach and consider there to be a number of inconsistencies between the tables contained in Policies SP6, H1 and H2.	Inconsistencies between SP6, H1 and H2 should be addressed.	Yes

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Intert) ATTENDING EXAMINATION
106/19/H1-2/LC/US3	Craig Barnes	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 20	H 01 H 02	N/A	LC	US/3	<p>In broad terms, our client support the proposed approach to meeting development needs in urban areas. Outside of the urban areas our client consider that the Council's approach to the distribution is unclear and potentially provides a departure from the planning objectives and Policy SP2.</p> <p>There is a real lack of evidence to support the approach set out by the Council in rural areas. Supporting evidence is silent or out-of-date in examining rural housing needs. Whilst evidence is provided examining the sustainability of settlements, no evidence is provided in examining how completed, committed and allocated housing will respond to housing needs and whether this is sufficient to supply the vitality and vibrancy of rural services in the context of the NPPF. As such it is difficult to understand whether the Local Plan is effective in meeting rural development needs are in line with Council Objectives.</p> <p>It is unclear whether the allocations set out in Policy H2 are sufficient to meet the needs of these settlements further to the commitments made. It therefore cannot be concluded whether the plan provides for a sustainable pattern of development or provides an effective basis on which to meet the development needs of the rural area.</p> <p>The absence of information on housing need means that the Local Plan does not provide a sufficient basis for Neighbourhood Plans to be prepared. Emerging national planning policy requires local planning authorities to define the housing requirement for Neighbourhood Plans. The lack of a prescribed figure will mean that neighbourhood planning bodies will be planning blindly without guidance from the Council on how to prepare their plans in accordance with the strategic approach to development. [Further detail provided in the representatives full response.]</p>	<p>The Council should seek to identify a specific housing requirement for its sustainable rural villages as a proportion of the housing requirement which is considered responsive to development needs and proportionate for the role of these settlements within the settlement hierarchy. In view of the deliverability difficulties experienced within the wider plan area it is considered that a high proportion of this should be directed to the rural area including Hornby and Slyne-with-Hest where at this stage little or no allocations are proposed.</p>	Yes
097/05/H1&2/LC/US1&3&4	Joanne Harding	Home Builders Federation	Strategic Policies & Land Allocations DPD	Chapter 20	H 01 H 02	N/A	LC	US/1 US/2 US/3 US/4	<p>The HBF recommends that the Plan allocations more sites than required to meet the housing requirement as a buffer. This buffer should be sufficient to deal with any under delivery which is likely to occur from some sites. Such an approach would be consistent with the NPPF requirements to plan positively and be flexible. The HBF recommends that as large a contingency as possible (circa 20%) to the overall housing land supply to provide sufficient flexibility.</p> <p>The HBF does have some concerns over the delivery of homes and seek assurance that the housing requirement will be delivered, particularly given the reliance and use of Broad Areas of Growth and Strategic Sites.</p>	<p>The HBF recommends that the monitoring framework includes specific monitoring triggers in relation to the delivery of housing allocations including (but not restricted to) persistent failure to meet its housing requirement, lack of 5 year supply and additional household growth information identifying an increased need for new housing. There will also be a need for appropriate actions and timescales to be identified if targets are not met.</p> <p>Taking into consideration the timeframe for preparing a plan, it is considered that the production of a revised plan may not be the quick solution to non delivery. A more appropriate approach would be to introduce further flexibility to the housing supply at this stage through the allocation of additional sites and through the identification of safeguarded land.</p>	Yes
128/06/H1-2/LC/US1-4	Aqub Saghir	N/L Consulting on behalf of Persimmon Homes	Strategic Policies & Land Allocations DPD	Chapter 20	H 01 H 02	N/A	LC	US/1 US/2 US/3 US/4	<p>We support the removal of sites which have commenced construction from Policy H1. However, the Council have still placed reliance on a number of sites which have planning permission, it is recommended that sites with planning permission are removed from the allocated supply.</p> <p>There is a greater need to allocate more sites to deliver the required need for the district. The Council should consider allocating additional sites which are above and beyond the housing requirement which would allow for a fall-back position should under-delivery occur. This is considered to be vital as the Council have not met the required annual need since the plan period started in 2011. [Further detail provided in the representatives full response.]</p>	<p>The Council should remove reference to site which have planning permission from the calculated supply.</p> <p>Further sites should be allocated for housing which boost allocations above and beyond the housing requirement to provide greater flexibility.</p>	No
106/42/H1&H4/LC/US1-4	Ian Gilbert	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 20	H 01 H 04	N/A	LC	US/1 US/2 US/3 US/4	<p>We do not have any substantial points to make with regard to the Council's updated landscape evidence. We note the proposals to include land to the north of Galgate, Bairsig as part of the Key Urban Landscape designation. Whilst we do not object to the description of the area generally it is not clear what the proposed designation is intended to achieve. [Further detail provided in the representatives full response.]</p>	<p>We consider it necessary for the assessment to be accompanied by a plan setting out the extent of the designation.</p>	Yes
019/04/H1&5/LC/US3-4	Tony McIteer	McIteer Associates Ltd	Strategic Policies & Land Allocations DPD	Chapter 20	H 01 H 05	N/A	LC	US/3 US/4	<p>Eccleston Homes support the allocation of land at Wyresdale Road for housing under Policy H1 and H5. However, they consider Policy H5 should not just be confined to land at the Leisure Park and Auction Mart and should be widened to include land to the east of House Farm, fronting Wyresdale Road. Eccleston Homes consider that Criterion XV should be more explicit in terms of the affordable housing requirement.</p>	<p>The allocation of Policy H5 should be expanded to include land to the east of House Farm, Wyresdale Road and should provide explicit requirements over the affordable housing provision.</p>	No
106/03/H2/LC/US1-4	Craig Barnes	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 20	H 02	N/A	LC	US/1 US/2 US/3 US/4	<p>Barton Willmore on behalf of Storey Homes have provided full and detailed submissions in relation to land at Manor Lane, Slyne-with-Hest. Due the scale and detail of the representation received these have not been summarised and can be viewed in full only.</p>	<p>Suggested wording and recommended amendments are provided within the representatives full response.</p>	Yes
106/04/H2/LC/US1-4	Craig Barnes	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 20	H 02	N/A	LC	US/1 US/2 US/3 US/4	<p>Barton Willmore on behalf of Storey Homes have provided full and detailed submissions in relation to land at Melling Road, Hornby. Due the scale and detail of the representation received these have not been summarised and can be viewed in full only.</p>	<p>Suggested wording and recommended amendments are provided within the representatives full response.</p>	Yes
127/02/H2/LC/US1	Alban Cassidy	Cassidy & Ashton on behalf of Mrs S Thagia	Strategic Policies & Land Allocations DPD	Chapter 20	H 02	N/A	LC	US/1	<p>Land at Fenham Carr Lane should be identified within this policy in order to make a contribution to meeting housing needs within the district.</p>	<p>Identification of Fenham Carr Lane for housing under Policy H2.</p>	Yes
054/08/H2/LC/US1-4	Chris Garner	Garner Planning on behalf of Russell Armer Ltd	Strategic Policies & Land Allocations DPD	Chapter 20	H 02	N/A	LC	US/1 US/2 US/3 US/4	<p>By definition Sustainable Rural Settlements are sustainable locations capable of accommodating further housing, the planning authority should review the capacity of Sustainable Rural Settlements to accommodate housing growth. For the 5 settlements outside of the AONB there should be a particular focus on new housing growth.</p> <p>Over Kellat is a location capable of accommodating further housing development and the site north of Kirkby Lonsdale Road should be identified for housing development with a capacity of 45 dwellings.</p> <p>576 dwellings are identified for Middleton Towers which is considered to be extremely unlikely to deliver this amount of housing through the plan period. Middleton is not considered to be a sustainable location for development.</p> <p>At this stage, given the constraints of neighbourhood plan areas it is difficult to see how approximately 300 dwellings can come forward from these settlements. The Local Plan should at least indicate how much housing each Neighbourhood Plan should accommodate, rather than each of the qualifying bodies progressing without knowing the level that is considered appropriate. [Further detail provided in the representatives full response.]</p>	<p>Review the capacity of Sustainable Rural Settlements in the context of the SHELAA and identify new housing sites on the edge of these settlements.</p> <p>Allocate land north of Kirkby Lonsdale Road for 45 dwellings, review the likely number of housing completions at Middleton Towers.</p> <p>Identify the number of dwellings for each Neighbourhood Plan area to determine whether 300 is a realistic assumption.</p>	Yes
145/01/H2/LC/US2-3	Stuart Booth	WVPC Planning on behalf of Mr & Mrs Williamson	Strategic Policies & Land Allocations DPD	Chapter 20	H 02	N/A	LC	US/2 US/3	<p>We propose that the site at Denny Bank, Main Street, Arkholme be allocated for housing under Policy H2 of the Local Plan. The site is located in the centre of the village which should be identified as a sustainable settlement. As such the site is considered to be a sustainable location for the purposes of housing.</p>	<p>Allocate land at Denny Bank, Arkholme for residential purposes for between 10 and 20 dwellings.</p>	Yes
134/02/H2/LC/US2&3	Stuart Booth	WVPC Planning on behalf of S Cornthwaite	Strategic Policies & Land Allocations DPD	Chapter 20	H 02	N/A	LC	US/2 US/3	<p>A submission is made to propose the land opposite to the former SJ Bargh Site in Caton for housing purposes. This site should be allocated for residential purposes under Policy H2.</p>	<p>Allocate land for development under Policy H2 in Caton and Brookhouse</p>	Yes
139/03/H2/LC/US1-4	Paul Tunstall	WVPC Planning on behalf of TNPG Sandeman Trust and M Capital Developments	Strategic Policies & Land Allocations DPD	Chapter 20	H 02	N/A	LC	US/1 US/2 US/3 US/4	<p>Our client owns land at Home Farm, Ellet. Having undertaken a considerable amount of survey work and assessment already, the site owners are confident that Home Farm can be delivered and that there are no technical matters that would prevent it coming forward in its entirety during the Local Plan period.</p> <p>Evidence within our submission there will be strong demand and market for the type of development shown in our draft masterplan, including a retirement village within the wider residential area. We therefore submit that in terms of the text in footnote 11 of the NPPF, the site is available now (there is only one landowner), suitable and achievable. This is a deliverable mixed-use development that will deliver a considerable number of houses to the district's housing supply within the plan period.</p>	<p>Allocate Home Farm, Ellet for residential development and identify it within Policies SP6 and H2 of the Plan.</p>	
098/02/H2/LC/US1-4	Stan Griffiths	RCA Regeneration on behalf of G.B.R Escolme	Strategic Policies & Land Allocations DPD	Chapter 20	H 02	N/A	LC	US/1 US/2 US/3 US/4	<p>Our client's site on land to the east of Chapel Lane, Overton was originally assessed in the 2015 SHELAA which identified that the site could accommodate up to 150 dwellings. The assessment concluded that the site was undeliverable as there was no evidence to suggest the site was suitable or achievable. However, in light of the evidence submitted as part of this representation the inclusion of this site should be reconsidered and included within Policy H2.</p> <p>Land which is identified under Policy H2.3 (land at Yenham Lane, Overton) should be reconsidered in light of a range of constraints affecting the site and the scale of housing proposed (23 dwellings) is overly optimistic. [Further detail provided in the representatives full response.]</p>	<p>Land at Chapel Lane, Overton should be identified for residential development under Policy H2.</p> <p>Land at Yenham Lane (H2.3) should be reconsidered and the scale of development in this location reduced.</p>	Yes
162/02/H2/LC/US1-4	Graham Love	Smith & Love Planning on behalf of Applethwaite Homes	Strategic Policies & Land Allocations DPD	Chapter 20	H 02	N/A	LC	US/1 US/2 US/3 US/4	<p>Both our clients sites at Chapel Lane, Galgate and Sea View Drive, Slyne-with-Hest can make a valuable contribution to boosting the supply of market housing when it is most needed in the early part of the plan period and meeting the specialist needs of older people. [Further detail provided in the representatives full response.]</p>	<p>That land at Chapel Lane Galgate and land to the west of Sea View Drive, Slyne-with-Hest be allocated within the Local Plan via Policy H2 (or alternatively for Sea View Drive via the Slyne-with-Hest Neighbourhood Plan) both for 32 dwellings.</p>	
162/06/H2/LC/US1-4	Graham Love	Smith & Love Planning on behalf of Applethwaite Homes	Strategic Policies & Land Allocations DPD	Chapter 20	H 02	N/A	LC	US/1 US/2 US/3 US/4	<p>Applethwaite Homes maintains its objections as previously set out in regard of the omission of two sites from the Local Plan on land at Chapel Lane, Galgate and land at Sea View Drive, Hest Bank.</p> <p>Having reviewed the Strategic Housing and Employment Land Availability Assessment it is pleased to note that it supports development at these sites. There are no constraints to delivery on these sites and they should be identified for housing development within the Local Plan. [Further detail provided in the representatives full response.]</p>	<p>The Local Plan should include (and facilitate the Neighbourhood Plans to include) a greater range of non-strategic housing allocations which can be delivered quickly in the early part of the plan period without the need for significant infrastructure.</p>	Yes
108/04/H2/LC/US1-4	Graham Love	Smith & Love Planning on behalf of G & M Parker	Strategic Policies & Land Allocations DPD	Chapter 20	H 02	N/A	LC	US/1 US/2 US/3 US/4	<p>Our clients land at Escowbeck Farm can make a valuable contribution to meeting housing needs in Lancaster and can be relied upon to boost supply in the early phases of the plan. It should therefore be allocated in the Local Plan for housing development and included in the schedule of sites in Policy H2 in the event that the Caton-with-Littledale Neighbourhood Plan is not sufficiently progressed in time in line with Local Plan. [Further detail provided in the representatives full response.]</p>	<p>In the event that Caton-with-Littledale Neighbourhood Plan does not sufficiently progress with the proposed submission (or examination) of the Local Plan and the City Council has to resume responsibility for local planning of the neighbourhood area, the land at Escowbeck Farm, Quernmore Road should be allocated for housing and identified in the Local Plan Policies Map.</p>	Yes
108/06/H2/LC/US1-4	Graham Love	Smith & Love Planning on behalf of G & M Parker	Strategic Policies & Land Allocations DPD	Chapter 20	H 02	N/A	LC	US/1 US/2 US/3 US/4	<p>G and M Parker maintain their objection to the Local Plan in regard of their land at Escowbeck Farm, Quernmore Road, Caton which they feel should be allocated for residential purposes in the Local Plan. G and M Parker have reviewed the 2018 SHELAA and are pleased to note that it support development within their landholding.</p> <p>However G and M Parker consider that the 2018 contains a significant flaw and contrasts with previous findings for the site in that development should be restricted on the site due to landscape constraints. The results of the 2018 SHELAA have been appraised by independent consultants (Tyler Grange) on behalf of G and M Parker (this appraisal is contained within the responders full representation). This evidence suggests that the site, when considered as a whole rather than in individual parcels is capable of coming forward for development without having a detrimental impact on the wider landscape.</p> <p>The failure of the Local Plan to plan for and provide sufficient new housing is a key concern and it is not sound without further modification to ensure that all, or certainly substantially more, of the identified local housing need is met. [Further detail provided in the representatives full response.]</p>	<p>The Local Plan should include (and facilitate the Neighbourhood Plans to include) a greater range of non-strategic housing allocations which can be delivered quickly in the early part of the plan period without the need for significant infrastructure.</p> <p>G and M Parker have put forward their land at Escowbeck Farm for inclusion in the Caton-with-Littledale Neighbourhood Plan as a site allocation for approximately 60 dwellings. Therefore, in the event that their neighbourhood plan does not progress in time with the Local Plan, the emphasis is on the City Council to resume responsibility for the local planning for the area.</p> <p>The land at Escowbeck Farm should be identified in Policy H2 of the Strategic Policies &amp; Land Allocations DPD.</p>	Yes
107/04/H2/LC/US1-4	Graham Love	Smith & Love Planning on behalf of J & S Lamb	Strategic Policies & Land Allocations DPD	Chapter 20	H 02	N/A	LC	US/1 US/2 US/3 US/4	<p>The approach set out in Policy H2 (paragraph 20.6) is not supported as it provides no certainty that SHELAA sites will be delivered. The planning risk associated with this approach must be removed in order to maximise the likelihood of these sites coming forward and planning permissions being granted, by including them as rural allocations in the Local Plan. For the reasons explained, we consider that our clients land at Tithebarn Hill, Glasson Dock should be identified to make a valuable contribution to boosting housing supply. [Further detail provided in the representatives full response.]</p>	<p>Our clients land should be added to the schedule of allocated sites in H2 and identified to deliver 40 dwellings.</p>	Yes
107/05/H2/LC/US1-4	Graham Love	Smith & Love Planning on behalf of J & S Lamb	Strategic Policies & Land Allocations DPD	Chapter 20	H 02	N/A	LC	US/1 US/2 US/3 US/4	<p>J and S Lamb maintain their objection in relation to land at Tithebarn Hill, Glasson Dock and maintain the site should be allocated for residential development in the Local Plan. J and S Lamb consider the 2018 SHELAA to be unsound on the basis that Glasson Dock is no an unsustainable development and should not render the land at Tithebarn Hill unsuitable for development.</p> <p>The failure of the Local Plan to plan for and provide sufficient new housing is a key concern and it is not sound without further modification to ensure that all, or certainly substantially more, of the identified local housing need is met. [Further detail provided in the representatives full response.]</p>	<p>The Local Plan should include a greater number and wider range of non-strategic housing sites which can be quickly delivered in the early part of the plan period without the need for significant infrastructure.</p> <p>To support this, the land at Tithebarn Hill, Glasson Dock should be included as a residential allocation site under Policy H2.</p>	Yes
028/01/H2-3/LC/5	Janet Baguley	Natural England	Strategic Policies & Land Allocations DPD	Chapter 20	H 02.3	N/A	LC	5	<p>The findings of the HRA for the allocation at Yenham Lane, Overton identified that some of the neighbouring fields could be functionally linked to Morecambe Bay SPA but this issue has not been included in the policy or the supporting text.</p>	<p>In order to improve soundness we recommend that this issue should be highlighted and that a project level HRA may be necessary. Should the allocation be removed this would also address Natural England's concerns.</p>	No
100/11/H3/LC/US1&4	David Barnes	Star Planning on behalf of Seemore Properties Ltd	Strategic Policies & Land Allocations DPD	Chapter 20	H 03	N/A	LC	US/1 US/4	<p>Seemore Properties support the principle of the redevelopment of the Ridge Lea Hospital for residential purposes. However, objection is made to the detailed requirements associated with any redevelopment proposals. Whilst seeking to preserve a non-designated heritage assets is laudable, as made clear by the NPPF, there is no presumption in favour of retaining any non-designated heritage asset or its setting.</p> <p>In assessing planning application affecting non-designated assets, the Framework identifies that the significance of the asset should be taken into account in determining the application and a balanced judgement applied regarding the scale of any harm or loss of significance (para 135). The Framework does not apply to non-designated heritage assets the extreme type of protection sought by Policy H3, such as the presumption in favour of the retention and conservation of the identified heritage assets on the site. Unlike the protection afforded to designated heritage assets, there would be no specific requirement for specific heritage consent to be obtained for the demolition of a non-designated heritage asset.</p>	<p>Policy H3 requires redrafting in a form which is consistent with paragraph 135 of the Framework with the existence of the non-designated heritage asset at Ridge Lea Hospital being put into the planning balance and not putting any greater weight beyond what is provided for in the Framework.</p>	Yes
066/01/H3.1/LC/US3	Richard Parker	Harrison Pitt Architects on behalf of CityBlock	Strategic Policies & Land Allocations DPD	Chapter 20	H 03.1	N/A	LC	US/3	<p>Through previous representations made on the Draft Local Plan in 2017, the then owners of the Stone Row Head Site (Homes England) requested that the site be extracted from the wider allocation for Ridge Lea Hospital (Policy H3.1). However, the Publication Version of the plan remains unchanged.</p> <p>Stone Row Head is now owned by CityBlock who would re-iterate the request that the site should be extracted from Policy H3.1 and allocated as a separate, residential-led proposal.</p>	<p>The Stone Row Head site should be extracted from Policy H3.1 and allocated separately as a residential-led development. It is recommended that a separate policy allocation is applied to the Stone Row Head rather than being part of the wider draft H4 area.</p>	No
106/05/H4/LC/US1-4	Craig Barnes	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 20	H 04	N/A	LC	US/1 US/2 US/3 US/4	<p>Barton Willmore on behalf of Storey Homes have provided full and detailed submissions in relation to land at Grab Lane, Lancaster. Due the scale and detail of the representation received these have not been summarised and can be viewed in full only.</p>	<p>Suggested wording and recommended amendments are provided within the representatives full response.</p>	Yes
106/41/H4/LC/US1-4	Ian Gilbert	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 20	H 04	N/A	LC	US/1 US/2 US/3 US/4	<p>Whilst we have no fundamental objections to the landscaping evidence associated with Grab Lane, Lancaster, it is unclear at this stage how the Council should seek to take account of this further designation or why it is considered necessary to incorporate more of the above site within the Urban Setting Landscape.</p> <p>Clearly the Local Plan is relying in part on the delivery of housing at Grab Lane and it should be carefully considered how any re-classification of land in this area will impact on the deliverability of the site. This is something that the evidence fails to make clear how this will be achieved. [Further detail provided in the representatives full response.]</p>	<p>No suggested amendments made.</p>	Yes
050/11/H4/LC/US4	Emily Hrycan	Historic England	Strategic Policies & Land Allocations DPD	Chapter 20	H 04	N/A	LC	US/4	<p>Bullet point iii should be re-written to provide clarity on matters affecting the historic environment in line with the NPPF.</p>	<p>Bullet Point iii to be amended to read 'preserve and enhance the setting of Ashton Memorial, which is an important heritage asset and prominent landmark in the wider area.'</p>	

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Inter) ATTENDING EXAMINATION
109/02/H6/LC/US1-4	Claire Pegg	Cushman & Wakefield on behalf of the L&K Group Plc	Strategic Policies & Land Allocations DPD	Chapter 20	H 05	N/A	LC	US/1 US/2 US/3 US/4	The principle of allocating of the existing Auction Mart site on Wyresdale Road is strongly supported. However, we do not support that the existing Auction Mart site continues to be grouped with the larger single allocation which also includes various land parcels to the east. These are under differing land ownerships and prevent the development of a comprehensive single scheme across the allocation.  There is an inconsistency between Policy H5 and DM3 in relation to affordable housing provision which appears contradictory and should be amended for consistency. Policy DM3 requires a 30% requirement for the site whereas H5 requires 40%. The policy should be amended to 30% to reflect historical requests for affordable housing on earlier phases of development in this area. [Further detail provided in the representatives full response.]	The allocation should be subdivided into smaller land parcels reflecting the separate land ownerships. Request that the affordable housing provision contained in Policy H5 be revised to 30% for each application to accord with Policy DM3.	Yes
050/12/H6/LC/US3	Emily Hrycan	Historic England	Strategic Policies & Land Allocations DPD	Chapter 20	H 05	N/A	LC	US/3	The development of this site needs to respect the setting of the Grade I Ashton Memorial, as per Policy H6, something which is referred to in the supporting text but not the policy.	The policy should be amended to include reference to Ashton Memorial.	
087/01/H5/NLCS/US1-4	Helen Moran	N/A	Strategic Policies & Land Allocations DPD	Chapter 20	H 05	N/A	NLC/5	US/1 US/2 US/3 US/4	The Plan is unsound as the population trends do not indicate that 12,000 new homes are required. The population increases proposed by the plan are not realistic and not reflective of future uncertainties and demand. There are no new employment opportunities being created as demonstrated by the Canal Corridor scheme.  How will new infrastructure be delivered (for example education) and how will it be funded? Likewise with healthcare provision. Plans have not been coordinated with infrastructure providers. There are significant risks of flood associated with this area (as demonstrated in November 2017) which have not been properly assessed. New development has already increased flood risk and will be further exacerbated by extra development which will create extra run-off. The roads in this area are already busy and extra houses will increase traffic flow significantly and the roads cannot cope with this.  The site is next to one of Lancaster's most popular parks and new development will have a detrimental impact on an iconic tourist attraction. This needs to be protected to retain its appeal and attractiveness to local people and visitors. I think this makes the DPD unsound and possibly not legally compliant given its close proximity to historical monuments.  Increasing number of housing will increase levels of crime and lead to a decrease in house prices.  The extra levels of traffic will have effects on local air quality and highway safety for cyclists and pedestrians. [Further detail provided in the representatives full response.]	The planned developments for Lancaster Leisure Park & Auction Mart and Grab Lane are removed from the Local Plan until such a time as information and supporting evidence is publicly available to demonstrate that it is viable, deliverable and affordable and will not increase the risk of flooding. [Further detail provided in the representatives full response.]	
105/02/H6/LC/US2-3	Nicola Elsworth	Homes England	Strategic Policies & Land Allocations DPD	Chapter 20	H 06	N/A	LC	US/2 US/3	Homes England is the owners of the site know as Royal Albert Farms which is part of the proposed allocation identified under Policy H6. As you will be aware planning permission has been granted for 77 homes and therefore request that Policy H6 and supporting text is amended to reflect this.	Amend Policy H6 to reflect current planning status.	No
050/13/DOS1/LC/US4	Emily Hrycan	Historic England	Strategic Policies & Land Allocations DPD	Chapter 21	DOS 01	N/A	LC	US/4	Historic England strongly objects to the allocation of Policy DOS1. The site partly includes Grade II listed structures which are under a single designation. The impact of any development proposals on the listed buildings and their setting would need to be considered for the whole building.  The development of several of the sites included as allocations have been identified in the Heritage Impact Assessments as being likely to result in harm to elements which contribute to the significance of heritage assets in the vicinity. Where this is the case, these site assessments set out a series of measures which, if implemented, will either remove or reduce harm, and will ensure that the site is development in a manner that is consistent with preserving the historic environment. Because of the sensitive nature of these locations it is not sufficient merely to rely on general, non-site specific policies to address this matter. [Further detail provided in the representatives full response.]	The inclusion of an additional bullet point to the development proposals that refer to site specific mitigation / enhancement measures and design consideration outlined in the Heritage Impact Assessment document. Alternatively the plan should be amended to ensure reference is made to the mitigation measures in the HIA through a direct reference to the document.	
122/11/DOS2/LC/5	Tim Bettany - Simons	Canal and River Trust	Strategic Policies & Land Allocations DPD	Chapter 21	DOS 02	N/A	LC	5	The Trust agree with the approach that development of this site should be tied with the wider regeneration of the canal corridor. The Trust support criteria VII in terms of providing a positive inter-relationship with the canal in accordance with Policy 73.	No suggested amendments made.	No
128/06/DOS3/LC/US1-4	Aqub Saghir	N/L Consulting on behalf of Persimmon Homes	Strategic Policies & Land Allocations DPD	Chapter 21	DOS 03	N/A	LC	US/1 US/2 US/3 US/4	We recognise the Council have amended the policy to now refer to the recent planning permission and support this.	No suggested amendments made.	No
086/01/DOS4/LC/5	Robert Welsh	A1 Supa Skips Ltd	Strategic Policies & Land Allocations DPD	Chapter 21	DOS 04	N/A	LC	5	This area has been allocated as a Development Opportunity Site, however this is an employment area supporting numerous business and employing a large number of people. At least half of the area is privately owned by business that do not wish to see the area development and want to continue operating on Lune Industrial Estate. Allowing housing to encroach any further onto the industrial estate would be a massive detriment to existing businesses.	The area should be re-allocated to an employment area and not be considered as a development site.	Yes
002/02/DOS4/NLCS/US3-4	Geoff Storey	Aggregate Industries UK	Strategic Policies & Land Allocations DPD	Chapter 21	DOS 04	N/A	NLC/5	US/3 US/4	The operation of ready mixed concrete plant operated by Aggregate Industries on the Lune Industrial Estate has been prejudiced by housing developments. The company are supportive of the regeneration objective of Policy DOS4 but the Council needs to be more proactive in facilitating the relocation of employment sites from the Lune Industrial estate. Heysham Industrial Estate needs to be substantially regenerated to provide a realistic relocation option.	Policy DOS4 needs to be closely linked to ECL7 with greater commitment to assist the relocation of businesses from the Lune Industrial Estate to Heysham.	Yes
165/02/DOS4/LC/US1-4	Ryan McEggart	GL Hearn on behalf of Travis Perkins	Strategic Policies & Land Allocations DPD	Chapter 21	DOS 04	N/A	LC	US/1 US/2 US/3 US/4	In light of the representations made to Policy ECS above, Travis Perkins consider that Policy DOS4 has not been positively worked. The need for a masterplan for this area is not justified and is not necessary and the Travis Perkins site should not be encumbered by this requirement. Furthermore it would not be effective in increasing the delivery of dwellings on this site. As currently worded Policy DOS4 is not considered sound.	Detailed wording is suggested within the representatives full response.	Yes
124/05/DOS4/LC/US1-4	Michael Gilbert	Peter Brett Associated on behalf of Hurstwood Holdings	Strategic Policies & Land Allocations DPD	Chapter 21	DOS 04	N/A	LC	US/1 US/2 US/3 US/4	We firmly support the general thrust of this policy which clearly recognises the opportunity to redevelop the site for alternative uses, including residential uses. We consider the policy should be updated to include a higher yield for residential units on the site, raising the figure up to 250. We also welcome the clear acknowledgement by the Council that in order to fully realise the regeneration potential of this site there will be a need to decant existing businesses to alternative sites.  Notwithstanding the above we do have some reservations over elements of this policy which should be taken into consideration. Fundamentally we are unable to support the proposal for a mixture of uses at the site and see no justification for continued reference to employment and economic uses at the site which is supported by the Council's own Employment Land Review in 2015. The Employment Land Review makes clear that the site is not a viable prospect for continued employment and economic use and therefore references to such uses should be deleted.  We also have concerns over the emphasis for a comprehensive development and an assertion that applications would result in sensitive land-uses being located in close proximity to heavy industrial uses not being supported. Whilst we appreciate the general preference for comprehensive development the industrial estate is not in one single ownership. A policy pushing for comprehensive development will not change this fact nor can it force a fully joined up approach between landowners. [Further detail provided in the representatives full response.]	We would recommend that the Council considered the re-wording of Policy DOS4 to recognise these issues and provide greater flexibility and pragmatism to support the realistic release of land so not to unduly constrain much needed housing development from progressing. As currently drafted it reads as if the Council will only support a scheme which involves all the land within this allocation which is not a realistic proposition and seriously jeopardises the soundness of this policy.  We would also request that Policy DOS4 is updated to reflect the previously developed nature of the site and the potential for abnormal costs that might constrain the ability of the site to deliver the full quantum of affordable housing and other contributions which would usually be sought.	Yes
124/09/DOS4/LC/US1-4	Michael Gilbert	Peter Brett Associated on behalf of Hurstwood Holdings	Strategic Policies & Land Allocations DPD	Chapter 21	DOS 04	N/A	LC	US/1 US/2 US/3 US/4	Our client supports the findings of the SHELAA in relation to land at Lune Industrial, however there are a number of inaccuracies and inconsistencies in the assessment which should be rectified. [Further detail provided in the representatives full response.]	The SHELAA should be added to address the inconsistencies identified.	Yes
088/01/DOS4/LC/5	Margaret Welsh	Quay Concrete Ltd	Strategic Policies & Land Allocations DPD	Chapter 21	DOS 04	N/A	LC	5	We are a small business operating on Lune Industrial Estate, housing has already been erected along New Quay Road which has already impacted on our business and developing the Lune Industrial Estate will cause more problems as there are businesses on this site that do not wish to move. Industrial land should not be considered for development especially when not all the businesses are willing or want to move. Business and housing do not mix.	This area should remain as an industrial area and development should not be considered.	No
007/01/DOS5/NLCS-5/US1-4	Colin Griffiths	Satnam Planning Services	Strategic Policies & Land Allocations DPD	Chapter 21	DOS 05	N/A	NLC/3 NLC/4 NLC/5	US/1 US/2 US/3 US/4	The policy is imprecise and refers to matters of historic uses not actual uses now. The former uses ceased years ago and are not relevant now. There is no support in Regulations or policy for such a stance taken in Policy DOS4. The policy is unduly restrictive and not positively prepared. Satnam have submitted representations on this site previously which have been ignored and not countered by the Council.	The policy should exclude reference to the area of the site not used for active recreation at present.	Yes
054/09/DOS7/LC/US2-4	Chris Garner	Garner Planning on behalf of Russell Armer Ltd	Strategic Policies & Land Allocations DPD	Chapter 21	DOS 07	N/A	LC	US/2 US/3 US/4	The site does not comply with the NPFF definition of deliverable or developable. The explanation of the policy indicates that the planning authority have concerns about remoteness from services and infrastructure, however the policy supports sustainable development of the site which is surely not housing.	Adjust the housing completions assumptions downwards and ensure in the context of H1 and H2 there are an increased number of housing sites allocated for development.	Yes
028/04/DOS7/LC/5	Janet Baguley	Natural England	Strategic Policies & Land Allocations DPD	Chapter 21	DOS 07	N/A	LC	5	Any development of the site at Middleton Towers would need to consider coastal defences and this has not been picked up within the policy wording.	Soundness would be improved if this matter was addressed through revised policy wording.	No
167/13/DOS9/LC/US2-4	Hannah Walker	Barton Willmore on behalf of SCP Consulting Ltd	Strategic Policies & Land Allocations DPD	Chapter 21	DOS 09	N/A	LC	US/2 US/3 US/4	Our client supports the principle of regenerating this site, however our client remains concerned that the Council has failed to provide sufficient evidence that an alternative mix of use would be viable on this site. As such our client objects to the inclusion of this policy as it is unjustified, ineffective and inconsistent with national policy.  Furthermore the supporting text highlights that the Council support development which generates significant number of HGV movements due to its location within the town centre. As such, this site would not be suitable to deliver employment development in Carnforth and this provides a further reason to why the Council need to allocate additional land in the town. [Further detail provided in the representatives full response.]	No suggested amendment made.	Yes
123/02/DOS9/NA	Diane Clarke	Network Rail	Strategic Policies & Land Allocations DPD	Chapter 21	DOS 9	N/A	N/A	N/A	Proposals adjacent to the West Coast Mainline should include a minimum 1.8m trespass proof fence set back 1m from the railway boundary to prevent unauthorised access on to the railway. New residents of development (particularly minors) may not be aware of the risks posed by accessing the railway. Early engagement with Network Rail on development proposals adjacent to or close to the railway is strongly recommended.	No suggested amendments made.	No
178/02/DOS/LC/US1-4	Rachel Ford	Bowcliffe Berrydale Limited c/o MBH	Strategic Policies & Land Allocations DPD	Chapter 21	N/A	N/A	LC	US/1 US/2 US/3 US/4	The land at the VVV Gymnasium, Marine Drive, Hest Bank is considered to be suitable, available and deliverable for new development and should be allocated in the Strategic Policies & Land Allocations DPD for mixed use purposes. [Further detail to support this position is provided in the representatives full response.]	That the site at VVV Gymnasium, Marine Drive, Hest Bank is allocated in the Local Plan for mixed use development.	Yes
050/15/EN1-2/LC/US4	Emily Hrycan	Historic England	Strategic Policies & Land Allocations DPD	Chapter 22	EN 01 EN 02	N/A	LC	US/4	Historic England strongly objects to the content of this policy as it does not accord with the requirements of the NPFF on matters affecting the historic environment. It is not clear what the purpose of Policy EN1 is. The Council have an adopted Development Management DPD which provides a framework for planning applications affecting these heritage assets. Policy EN1 merely lists the conservation areas within the district and does not provide a strategy that safeguards their appearance during the plan period.	The proposed amendments to Policy SP7 of this DPD (as referred to in representation 050/15) would deal with this issue.	
050/15/EN3/LC/5	Emily Hrycan	Historic England	Strategic Policies & Land Allocations DPD	Chapter 22	EN 03	N/A	LC	5	We support this policy in particular the aim of delivering heritage-led regeneration.	No suggested amendments made.	
161/02/EN4/LC/5	Lucy Barron	Arncliffe & Silverdale AONB Partnership	Strategic Policies & Land Allocations DPD	Chapter 22	EN 04	N/A	LC	5	We welcome Policy EN4 that all development in the AONBs should be sustainable, consistent with the primary purpose of the AONB designation and guided by the AONB Management Plan. We consider this to be consistent with national planning policy.	No suggested amendments made.	No
167/14/EN5/LC/5	Hannah Walker	Barton Willmore on behalf of SCP Consulting Ltd	Strategic Policies & Land Allocations DPD	Chapter 22	EN 05	N/A	LC	5	Our client welcomes the flexibility provided by Policy EN5, supplemented by Policy DM46 to deliver development within the open countryside.	No suggested amendment made.	Yes
054/10/EN5/LC/US2-3	Chris Garner	Garner Planning on behalf of Russell Armer Ltd	Strategic Policies & Land Allocations DPD	Chapter 22	EN 05	N/A	LC	US/2 US/3	The policy simply refers to other policies and does not appear to be a policy in its own right. Open Countryside washes over Sustainable Rural Settlements so it is not clear how development on the edge of such settlement complies with the Development Management DPD in this regard.	Delete the policy.	Yes
146/05/EN5/NLCS/US1-4	John Fleming	Gladman Developments Ltd	Strategic Policies & Land Allocations DPD	Chapter 22	EN 05	N/A	NLC/5	US/1 US/2 US/3 US/4	This policy is considered unnecessary as it simply refers to other policies within other DPDs.	Delete Policy EN5	Yes
030/04/EN5/NLCS/US3	Helen Binns	Walsingham Planning on behalf of KCS Development Ltd	Strategic Policies & Land Allocations DPD	Chapter 22	EN 05	N/A	NLC/5	US/3	It is considered that this policy does not sit comfortably with Policy DM4 of the Development Management DPD which is concerned with residential development outside of main urban areas.	It is considered this could quite easily be addressed by amending the wording of Policy EN5 to require development to have due regard to Policy DM4.	No
178/01/EN6/LC/US1-4	Rachel Ford	Bowcliffe Berrydale Limited c/o MBH	Strategic Policies & Land Allocations DPD	Chapter 22	EN 06	N/A	LC	US/1 US/2 US/3 US/4	Objection to the status of Green Belt on land at the VVV Gymnasium, Marine Drive Hest Bank. The land should be removed from the Green Belt in line with the Council's own conclusions in their Green Belt Review which supports its release.	That the site at VVV Gymnasium, Marine Drive, Hest Bank is removed from its current Green Belt designation.	Yes
186/01/EN6/NLCS/US1&4	David Crossall	Morecambe Town Council	Strategic Policies & Land Allocations DPD	Chapter 22	EN 06	N/A	NLC/5	US/1 US/4	With regard to the proposed realignment of the Green Belt on land surrounding Torrisholme Barrow and to the rear of residential properties on Fulwood Drive. It is the view of the Town Council that the NPFF clearly intends that exceptional circumstances envisaged in the Framework relate to the removal of Green Belt protection from development.  The City Council given as its only justification for moving the boundary of the Green Belt the opinion that a railway line exists as a more permanent feature and thus could serve as a more permanent boundary.  It is the view of Morecambe Town Council that the existing town boundary serves as a more appropriate boundary to the Green Belt and that it is no less permanent than the railway line which could, as some future point, be removed however unlikely that may seem at the present time. The boundary of a town, village or even city cannot be moved on the mere whim of a commercial or private interest. It is therefore clear that the existing boundary will always serve as a greater safeguard against encroachment and unrestricted sprawl than a railway line with no guaranteed degree of permanence, and permanence is clearly laid down as a required feature of a Green Belt boundary.	The proposal to re-align the Green Belt in this area should be removed from the Local Plan and the existing boundaries should be retained.	
192/01/EN6/LC/US2-4	Agnes Carrington	N/A	Strategic Policies & Land Allocations DPD	Chapter 22	EN 06	N/A	LC	US/2 US/3 US/4	Strongly object to the plan by Lancaster City Council to remove the boundary of the Green Belt east of Torrisholme Barrow. This boundary has proven to be a robust boundary for many years and no encroachment from boundary properties has occurred. This area is of vital importance to the area in providing recreational facilities.	This land should be retained in the Green Belt.	
021/02/C22/LC/US1-4	David Alexander	N/A	Strategic Policies & Land Allocations DPD	Chapter 22	EN 06	N/A	LC	US/1 US/2 US/3 US/4	Given the overall number of development sites across the district, there are no exceptional circumstances which warrant the removal of land to the south of Carnforth and the east of Torrisholme from the Green Belt. The plan should prioritise brownfield land in Carnforth (the former TDG site and Landsfield Quarry) to meet development needs. The Green Belt east of Torrisholme provides an important setting for the ancient Torrisholme Barrow and the Green Belt designation provides the most effective approach to protecting the open landscape which surrounds it and ensures that it is not cut off in the future from the open countryside. [Further detail on these matters provided in the responder's full response.]	Green Belt land to the South of Carnforth and to the East of Torrisholme, reverting the boundaries back to those identified in the previous Local Plan.  Policy ENB should identify appropriate open land uses for the area of separation identified since active land management in this area will be vital.	No
021/06/EN6/LC/US3	David Alexander	N/A	Strategic Policies & Land Allocations DPD	Chapter 22	EN 06	N/A	LC	US/3	In relation to the Key Urban Landscape Review and the Urban Setting Designation for Lancaster North and Lancaster East which assesses the landscape value for land surrounding Torrisholme confirms that the landscape value is very high and that it merits local landscape protection.  This site is currently designated as Green Belt and has been since the Green Belt was established, however the Council are currently seeking to remove the protection of Green Belt status and replace it with a local landscape designation.  The issue for the Inspector is which is strongest - Green Belt or Key Urban Landscape? In my opinion the site is in need of both designations since they are complementary to each other - the Green Belt status should be retained for long term planning protection against development pressures which already exist and the landscape designation is need to demonstrate the landscape quality.	That the proposed realignment of Green Belt boundaries around Torrisholme Barrow are removed and the current boundaries retained. That this area should be given further protection through the proposed local landscape designation.	No

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Intent) ATTENDING EXAMINATION
070/01/EN6/LC/5	Dr Lesley Bryan	N/A	Strategic Policies & Land Allocations DPD	Chapter 22	EN 06	N/A	LC	S	The Green Belt is an important feature in the district and therefore an integral part of the Local Plan. The North Lancashire Green Belt was set up to prevent the villages in north Lancaster merging as per the NPPF (para 79). The Green Belt still serves this function as pressure mounts to build more homes.  The continued designation of Green Belt in the area of Bolton-le-Sands and Slyne (particularly land which was previous investigated for development in 2015 - GB4) is in line with the NPPF due to successful retention of local landscape and in preserving the setting and special character of settlements (para 80), wider landscape (para 17 & 112) and the protection of essential wildlife corridors (para 114).	No suggested amendments made.	No
189/01/EN6/LC/US2&4	Howard Carter	N/A	Strategic Policies & Land Allocations DPD	Chapter 22	EN 06	N/A	LC	US/2 US/4	Objection raised to the removal of Green Belt status from land to the rear of Fulwood Drive, Bare. The National Planning Policy Framework states that changes to the Green Belt should only occur in exceptional circumstances, the Council have not cited any exceptional circumstances. National guidelines state that the 'robust nature' of a Green Belt boundary should be applied during the creation of new Green Belt. A more robust nature is not a sufficient reason to move an already existing boundary that has successfully served its purpose over a sustained period.	I request that the Council withdrawn this parcel of land from the Local Plan proposals and retain it within the Green Belt.	
195/01/EN6/LC/US4	Jon Bates	N/A	Strategic Policies & Land Allocations DPD	Chapter 22	EN 06	N/A	LC	US/4	I believe that the realignment of the Green Belt boundaries on land to the rear of Fulwood Drive and surrounding Torrisholme Barrow is fundamentally unsound and will weaken the protection enjoyed under the terms of the NPPF.  Green Belt boundaries can only be altered in exceptional circumstances, the NPPF does not define what these exceptional circumstances are but the only reason for doing so it to free up land for development in the context of the preparation of a new Local Plan. The proposed realignment does not designate the land for development so there are no exceptional circumstances to propose this change.  The NPPF clearly states that exceptional circumstances are required for boundaries to be changed, the strength of existing or proposed boundaries only applies when boundaries are to be moved. If there are no exceptional circumstances the boundary should not be moved and the existing boundary should remain. The decision for this change is therefore unsound.  This unsound decision will have the effect of weakening the protection against development which is enjoyed Green Belt. This weakening effect is already being felt as developers are already preparing plans for development of this area of land. The proposed move of Green Belt boundary will enable the very urban sprawl which the Green Belt is intended to afford protection against. [Further detail provided in the representatives full response.]	The land to the rear of Fulwood Drive and surrounding Torrisholme Barrow should be retained in the Green Belt.	
183/01/EN6/NLC/US2&4	Lee Bottomley	N/A	Strategic Policies & Land Allocations DPD	Chapter 22	EN 06	N/A	NLC/5	US/2 US/4	Objection to the proposed changes to the Green Belt boundary on land surrounding Torrisholme Barrow and land to the rear of Fulwood Drive. At present the Green Belt status prevents development going ahead however the proposed redesignation of the land to open countryside and a local landscape designation weakens this status and makes the land vulnerable to future development.  The re-alignment of Green Belt in this area is not consistent with national planning policy, which states that strategic policies should objectively assess the need for housing, identify strong reasons for restrictions including habitat sites and the Green Belt. There have been reviews of this area which identify important ecological value.  The existing boundary is a parish boundary and these cannot be moved by local government, only the boundary commission. The NPPF explains that Green Belt boundaries can only be altered in extreme circumstances but it is not clear what these extreme circumstances are in this case.  This area of land is not suitable for future development due to flooding and drainage issues. Therefore how can a decision be justified to eradicate the Green Belt designation from this area and build houses in this area which would put increased pressure on local infrastructure which is already unable to cope. [Further detail provided in the representatives full response.]	The proposal to re-align the Green Belt in this area should be removed from the Local Plan and the existing boundaries should be retained.	No
191/01/EN6/LC/US1-4	Mark Phelps	N/A	Strategic Policies & Land Allocations DPD	Chapter 22	EN 06	N/A	LC	US/1 US/2 US/3 US/4	Objection to the proposal to move the Green Belt boundary around Torrisholme, in line with the interpretation of national guidance which state that the robust nature of a Green Belt boundary should be applied during the creation of new Green Belt. A more robust nature is not sufficient reason to move an already existing boundary that has successfully served its purpose over a sustained period.  Any argument to move existing boundaries needs to be accompanied by, for instance, a comprehensive plan to change an area's status for some kind of development by demonstrating that the current boundary is not fulfilling its purpose. Neither of these have been suggested or proven to be the case and so there is no case for moving the Green Belt, other than lobbying by building forms in their own interest.  The impact of flooding in our area from development of this land would be keenly felt and local residents need green spaces.	The land to the rear of Fulwood Drive and surrounding Torrisholme Barrow should be retained in the Green Belt.	
177/01/EN6/NLC/US1-4	Patricia Harrison	N/A	Strategic Policies & Land Allocations DPD	Chapter 22	EN 06	N/A	NLC/5	US/1 US/2 US/3 US/4	Objection to the proposed changes to the Green Belt boundary on land surrounding Torrisholme Barrow. Concern that the proposed removal of this designation under the proposed Local Plan leaves the area highly vulnerable to the loss of important characteristics (as described by the Council's Key Urban Landscape Review). This vulnerability is already evidenced by the fact that local developers are campaigning to build a foot of the Barrow.	The existing Green Belt boundaries afforded to Torrisholme Barrow and its environs should be maintained in the new Local Plan. The Barrow is an important local asset and although its protective status forms part of the wider landscape which needs to have these characteristics maintained in their present state as the loss of them would be detrimental to its importance.	No
162/03/EN6/LC/US1-4	Graham Love	Smith & Love Planning on behalf of Applethwaite Homes	Strategic Policies & Land Allocations DPD	Chapter 22	EN 06	N/A	LC	US/1 US/2 US/3 US/4	Our client is disappointed with the conservative approach that has been taken to the Green Belt Review in the district and missed the opportunity this presents.  It is recommended that in light of the need to identify and allocate significantly more deliverable sites in the early part of the plan period, the Council must reconsider the Green Belt Review and pro-actively identify suitable small scale releases within the Green Belt, rather than solely on the urban edges Carnforth, Lancaster and Morecambe. Our clients land to the west of Sea View Drive falls into this category and should be removed from the Green Belt to help meet housing needs. [Further detail provided in the representatives full response.]	Our clients site, west of Sea View Drive should be removed from the Green Belt.	
135/03/EN6/5/LC	Graham Love	Smith & Love Planning on behalf of Oakmere Homes	Strategic Policies & Land Allocations DPD	Chapter 22	EN 06	N/A	LC	S	We support the removal of our client's land and surrounding land from the Green Belt, but consider the failure of the Local Plan to support the allocation of the northern portion of this site for residential development. This is a significant oversight and a missed opportunity. [Further detail provided in the representatives full response.]	No suggested amendments made.	Yes
135/08/EN6/LC/5	Graham Love	Smith & Love Planning on behalf of Oakmere Homes	Strategic Policies & Land Allocations DPD	Chapter 22	EN 06	N/A	LC	S	Oakmere maintains its support for the proposed removal of the Green Belt on land to the east of Fulwood Drive, Bare. [Further detail provided in the representatives full response.]	No suggested amendments made.	Yes
186/02/EN6&7/LC/US1-3	David Croxall	Morecambe Town Council	Strategic Policies & Land Allocations DPD	Chapter 22	EN 06 EN 07	N/A	LC	US/1 US/2 US/3	Whilst the Town Council does welcome the findings in the Key Urban Landscapes Review to retain Torrisholme Barrow as a Key Urban Landscape and protect it from future development given its historical importance and an important area of local amenity it concludes that there is no new evidence to support Policy EN6 within the proposed Local Plan for the change of designation of land to the east of Torrisholme from Green Belt to countryside and therefore that this part of the proposed Lancaster District Local Plan is not sound.	The proposal to re-align the Green Belt in this area should be removed from the Local Plan and the existing boundaries should be retained.	
146/06/EN7/NLC/US1-4	John Fleming	Gladman Developments Ltd	Strategic Policies & Land Allocations DPD	Chapter 22	EN 07	N/A	NLC/5	US/1 US/2 US/3 US/4	Gladman raise concerns with this policy and how it will be applied in a consistent manner through the development management process. Opinions on landscape are highly subjective and therefore without any further clarity this policy is likely to lead to inconsistencies.	Gladman do not consider do not consider this policy to be effective as required by the Framework.	Yes
151/06/EN7/LC/US1-2	Matthew Symons	Hollins Strategic Land	Strategic Policies & Land Allocations DPD	Chapter 22	EN 07	N/A	LC	US/1 US/2	It is important that Policy EN7 does not prevent development within the North Lancaster Strategic Site to such an extent that it results in not being possible to delivery the required 700+ new homes.	No suggested amendment made.	Yes
158/01/EN7/LC/US1-2	Paul Tunstall	WVPC Planning on behalf of Mr Needham	Strategic Policies & Land Allocations DPD	Chapter 22	EN 07	N/A	LC	US/1 US/2	The land at Fairview Torrisholme forms part of the new Urban Setting Landscape which effectively protects land from development. This identified area is unrelated to Torrisholme Barrow and is private land so unrelated to protecting land for recreational or historic importance. The site contains a residential dwelling and private garden. The scale and location of the site is commensurate with other allocated in the plan and its development would have a unduly harmful impact on the urban setting of Torrisholme Barrow.  The DPD does not adequately justify the EN7 designation and why it includes the Fairview site it serves neither purposes of Policy EN7.	Land at Fairview should be removed from its Policy EN7 designation.	Yes
151/09/EN7/US1-4	Lydia Harper	PWA Planning on behalf of Hollins Strategic Land	Strategic Policies & Land Allocations DPD	Chapter 22	EN 07	N/A	LC	US/1 US/2 US/3 US/4	The allocation of 'Urban Setting Landscape' (USL) within allocation S69 prejudices the delivery of the quantum of development proposed by removing a significant proportion of land that could be developed. It is asserted that this arbitrary blanket buffer to keep land open would remove a significant proportion of land which is considered to be developable.  The report prepared by landscape consultants influence concludes that the Council's evidence on this matter, prepared by Arcadis, does not justify the local landscape designation as the landscape does not have a high quality in terms of condition or value. It is considered that the Plan is not sound in so far as the requirement for the USL is not justified as the alternatives have not been taken into account but rather reiterated. There is no need to duplicate in one policy what can be achieved by another policy. The USL buffer should not be present in allocation S69 as it has been demonstrated that the extensive requirements of Policy S69 can ensure the site is sensitively developed to achieve satisfactory peripheral built form. [Further detail provided in the representatives full response.]	The Urban Setting Landscape designation should be removed from allocation S69.	Yes
135/09/EN7/LC/US1-4	Graham Love	Smith & Love Planning on behalf of Oakmere Homes	Strategic Policies & Land Allocations DPD	Chapter 22	EN 07	N/A	LC	US/1 US/2 US/3 US/4	Objection raised to the proposed designation under Policy EN7 as an urban setting landscape. Oakmere objects to the proposed extension of proposed extent of the designation and the land it affects and the consistency of conclusions between various elements of the evidence base in regard of this designation. [Further detail provided in the representatives full response.]	The boundary of the proposed Key Urban Landscape should be revised so it excludes the northern part of the land controlled by Oakmere Homes and instead follow a boundary further to the South.	Yes
100/09/EN7/LC/US1-4	David Barnes	Star Planning on behalf of Seemore Properties Ltd	Strategic Policies & Land Allocations DPD	Chapter 22	EN 07	N/A	LC	US/1 US/2 US/3 US/4	Seemore Properties question the appropriateness of local landscape designations associated with Policy EN7 and how it has been generally and extensively applied to most of the land on the edge of Lancaster. It is unclear how some of this designated land is either valued or distinctive landscape of the type referred to in the NPPF.  Related objection by Seemore Properties to the extent of the East Lancaster Strategic Site (Policy S67). Part of the Urban Setting Landscape which includes the agricultural buildings and associated land at Cuckoo Farm should be excluded from this designation. [Further detail provided in the representatives full response.]	Cuckoo Farm buildings and associated land should be excluded from the Urban Setting Landscape designation and included as part of the East Lancaster Strategic Site.  Greater consideration needs to be given to the appropriateness of the extent of Key Urban Landscape or Urban Setting Landscape and whether Policy EN7 is necessary.	Yes
049/01/EN7/LC/US1&3&4	Chris Middlebrook / Andrew Tait (agent)	Steven Abbott Associates	Strategic Policies & Land Allocations DPD	Chapter 22	EN 07	N/A	LC	US/1 US/3 US/4	It is not clear what purpose a landscape designation is seeking to serve in this area, the land is not particularly open nor of any significant landscaping value. [Further detail provided in the representatives full response.]	The landscape designation made for this site should be removed and replaced with a housing allocation for 25 houses.	Yes
197/01/EN7/LC/US2	Hilary Short	The Fairfield Association	Strategic Policies & Land Allocations DPD	Chapter 22	EN 07	N/A	LC	US/2	The Fairfield Association is alarmed at the failure of the Council to acknowledge the biodiversity of this area and in addition the plans for an inspirational cycle route through the reserve. The proposed cycle route would follow a narrow historic footpath which would necessitate the removal historic wildflower banks and hedgerow. A cycle path would also discourage the wildlife which the Fairfield Association have succeeded in attracting to the area.	No suggested amendment made.	
135/04/EN7/US1-4/LC	Graham Love	Smith & Love Planning on behalf of Oakmere Homes	Strategic Policies & Land Allocations DPD	Chapter 22	EN 07	N/A	LC	US/1 US/2 US/3 US/4	The draft Local Plan identified the removal of land to the East of Fulwood Drive from the Green Belt and its reversion to open countryside under Policy EN6. The Publication version however contains a new category of local landscape designation identified as 'Urban Setting Landscape'.  There is no evidence or justification for including this land within this new designation and it appears to be a retrospective action to include an additional layer of policy protection. It is clear that the proposed policy is not based on the intrinsic landscape value of the area, but merely a spatial planning controls maintaining the existing settlement edges. Our clients land does not contain any important natural features that require safeguarding.  We consider that the proposed Policy EN7 at Bare is unnecessary, and potentially elsewhere across the plan area within an area which is already constrained by AONB's and Green Belt. [Further detail provided in the representatives full response.]	Policy EN7 is not justified and unnecessary and should be deleted from the Local Plan.	Yes
148/13/EN8/LC/5	Jon Power	C&RE on behalf of Lancaster University	Strategic Policies & Land Allocations DPD	Chapter 22	EN 08	N/A	LC	S	The University agrees with the principle of separating Lancaster and Galgate given they are separate settlement areas. However, any areas of separation including within the future Garden Village DPD should not prejudice the University's aspirations for Forest Hills. It is important that the links between future development at Forest Hills and the Baffrig Campus are strengthened and maintained.	Future areas of separation should not prejudice future growth at Forest Hills.	Yes
146/07/EN8/NLC/US1-4	John Fleming	Gladman Developments Ltd	Strategic Policies & Land Allocations DPD	Chapter 22	EN 08	N/A	NLC/5	US/1 US/2 US/3 US/4	Gladman consider that new development can often be located in countryside gaps without leading to the physical or visual merging of settlements. Gladman submit that the M6 acts as a physical barrier to prevent the coalescence between Lancaster and Halton and as such do not consider the proposed area of separation necessary. Notwithstanding this, if the principle is to be retained then it should be modified to allow for a balancing exercise which assesses any harm to the visual or physical separation of settlements against the benefits of the proposal.	Consider the deletion of the area of separation between Lancaster and Halton, if retained then further flexibility should be incorporated into the wording to allow for the planning balance outlined.	Yes
147/02/EN8/LC/US1-2	Alice Weston	Knights Professional Services	Strategic Policies & Land Allocations DPD	Chapter 22	EN 08	N/A	LC	US/1 US/2	The proposed Area of Separation under Policy EN8 does not sit between the City and Halton, instead it acts to separate part of Lancaster from the Bay Gateway that runs to the north of the city. This land should therefore not be included in the Area of Separation and we consider a more appropriate strategy is to consider this land as a potential employment site under Policy EC2. [Further detail provided in the representatives full response.]	Policy EN8 should be removed from the Local Plan	Yes
163/14/EN8/LC/US2	David Diggle	Turley on behalf of Peel Holdings Investments	Strategic Policies & Land Allocations DPD	Chapter 22	EN 08	N/A	LC	US/2	Peel notes the comments set out within Policy EN8 in relation to areas of separation. Given the current absence of masterplanning for the Garden Village it is considered premature to propose areas of separation before having a plan which shows these areas so that the positive and negative impacts can be properly considered.	No suggested amendments made	Yes
127/01/SC1/LC/US1	Alban Cassidy	Cassidy & Ashton on behalf of Mrs S Thaglia	Strategic Policies & Land Allocations DPD	Chapter 22	EN 10	N/A	LC	US/1	It is considered that this allocation is not sound. There are no extenuating circumstances as to why development of this parcel of land should remain purposefully open. Although previous appraisals have indicated the site is important in the views of Williamson Park, this was not in the context of residential development at Grab Lane [proposed in Policy H4]. [Further detail provided in the representatives full response.]	The correct way to progress this would be to allocate all of the land between the M6 and Williamson Park for development but add the proviso that the development would be considered through the masterplan process. To do otherwise is to pre-determine the masterplanning process to the detriment of good planning practice.	Yes
053/18/EN11/LC/5	Dan Mitchell	Barton Willmore on behalf of H2O Urban LLP	Strategic Policies & Land Allocations DPD	Chapter 22	EN 11	N/A	LC	S	Central Carnforth is identified as an Air Quality Management Area. Clarification is required from the Council as to whether this is to be extended to account for new development to the south of Carnforth.	No suggested amendments made.	Yes
054/11/SC1/LC/US1-3	Chris Garner	Garner Planning on behalf of Russell Armer Ltd	Strategic Policies & Land Allocations DPD	Chapter 23	SC 01	N/A	LC	US/2 US/3	The Plan says that the Council have assessed all potential development opportunities in the context of the SHELAA, this is not accurate as only a interim SHELAA has been produced. The Plan suggests that allocations may need to be addressed at Public Examination stage which is far from ideal. The Plan does not indicate how housing is to be brought forward through Neighbourhood Plan allocations in total.	The policy should specify the number of houses to be brought forward through Neighbourhood Plans.  The policy should indicate the number of houses to be allocated in each Neighbourhood Plan to meet requirements.	Yes
134/01/SC1/LC/US2&3	Stuart Booth	JWPC Planning on behalf of S Cornishwaite	Strategic Policies & Land Allocations DPD	Chapter 23	SC 01	N/A	LC	US/2 US/3	The Local Plan does not propose site allocations in areas covered by neighbourhood plans, unless sites already covered by planning permission. Policy SP6 includes a requirement for 1,000 new homes to be provided in Neighbourhood Plan areas, but Policy SC1 does not provide any specific reference to the number of new homes required from each neighbourhood plan.	The Plan should identify specific housing requirements for each Neighbourhood Plan area.	Yes
128/08/SC1/LC/US4	Akshaj Saghir	NUL Consulting on behalf of Persimmon Homes	Strategic Policies & Land Allocations DPD	Chapter 23	SC 01	N/A	LC	US/4	Assurance is still required that Neighbourhood Plans will allow for growth within Neighbourhood Plan areas, without this there is a risk of a shortfall in supply during the plan period.	The Council must consider if the delivery of homes will be constrained by Neighbourhood Plans and if so how this issue can be addressed.	No
108/05/SC1/LC/US1-4	Graham Love	Smith & Love Planning on behalf of G & M Parker	Strategic Policies & Land Allocations DPD	Chapter 23	SC 01	N/A	LC	US/1 US/2 US/3 US/4	As the majority of neighbourhood plans have been designated to address housing growth, we strongly recommend that the City Council sets a proportionate individual housing requirement for each of the neighbourhood areas that is derived from the objectively assessed housing need. This will assist and add certainty to the process of preparing neighbourhood plans, and will ensure that each one is positively and proactively prepared and produced on time to coincide with the submission (or examination) of the Local Plan. [Further detail provided in the representatives full response.]	The City Council should set proportionate individual housing requirements for each of the designated Neighbourhood Areas that are derived from the objectively assessed housing need for Lancaster. This should be set out in an amendment to Policy SP6 or an amendment to Policy SC1 or in an associated new policy.	Yes

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Inter) ATTENDING EXAMINATION
135/05/SC1/US1-4/LC	Graham Love	Smith & Love Planning on behalf of Oakmere Homes	Strategic Policies & Land Allocations DPD	Chapter 23	SC 01	N/A	LC	US/1 US/2 US/3 US/4	We support the revised policy wording which makes clear that the City Council expected that neighbourhood plans should plan positively and proactively for their areas by allocating land for housing. We also agree in principle that the findings of the SHELA provides a strong and robust evidence base to inform this process.  Given the Governments intentions for specific housing requirements to be given to neighbourhood plans to direct levels of growth, it is recommended that the City Council seeks to set proportionate requirements for each of the neighbourhood plan areas in the district. [Further detail provided in the representatives full response.]	The Council should set proportionate housing requirements for each of the designated Neighbourhood Plan areas that are derived from the objectively assessed housing need figure for Lancaster.	Yes
122/12/SC2/LC/US2&4	Tim Bettany - Simons	Canal and River Trust	Strategic Policies & Land Allocations DPD	Chapter 23	SC 02	N/A	LC	US/2 US/4	Policy SC2 identifies a number of Local Green Spaces across the district including a number which have direct relationship with Lancaster Canal. From reviewing evidence it is not clear where these sites are located. There is a lack of evidence to how the sites have been assessed and conclusions reached. Due to the lack of clarity and information the Trust consider that insufficient evidence has been provided in order to make a fully informed response and consider that the policy, as drafted, is unsound.  Notwithstanding these points, the Trust would object to any land within our ownership being allocated as Local Green Space given the restrictive nature of the policy. The Lancaster Canal is an extensive tract of land and should not be separated into individual planning units, there is planning appeal history to support this view. No evidence has been provided to highlight why any particular stretch is demonstrably special. For these reasons set out above, the designation of sections of the canal as Local Green Space would, if proposed, fail to meet the qualifying criteria set out in Paragraph 77 of the NPPF. [Further detail provided in the representatives full response.]	We suggest that any proposed Local Green Spaces alongside the Lancaster Canal are deleted from the plan and that other policies, for example T3 which relates specifically to Lancaster Canal are left to meet the Council's aspirations for the Canal without imposing a Green Belt type policy on these areas.	No
146/08/SC2/NLCS/US1-4	John Fleming	Gladman Developments Ltd	Strategic Policies & Land Allocations DPD	Chapter 23	SC 02	N/A	NLC/5	US/1 US/2 US/3 US/4	Gladman do not have any areas of land that they wish to identify for consideration as Local Green Space, however take this opportunity to remind the Council of the tests which need to be met when seeking to designate Local Green Space. Whilst the methodology considers it inappropriate to designate extensive tracts of land, consistent with national policy, it fails to provide consideration of what would be considered to be a extensive tract of land.	Provide a definition of what is mean by an extensive tract of land in the context of Local Green Space.	Yes
021/04/SC2/LC/US3	David Alexander	N/A	Strategic Policies & Land Allocations DPD	Chapter 23	SC 02	N/A	LC	US/3	The Open Space Study draws attention to the shortfalls against the quality standards in all forms of open space provision within Morecambe and Heysham. In the interests of fairness and equality, priority should be given within the Local Plan coverage of this issue, to meet these quality standards in Morecambe and Heysham as soon as possible.	No suggested amendments made.	No
007/02/SC2/NLC2-5/US1-4	Colin Griffiths	Satnam Planning Services	Strategic Policies & Land Allocations DPD	Chapter 23	SC 02	N/A	NLC/2 NLC/3 NLC/4 NLC/5	US/1 US/2 US/3 US/4	Our previous representations set out the grounds why this policy is misapplied to the Freemans Wood area (the use of Freemans Wood is misplaced and refers to another area of land). The Council have failed to liaise or engage with the owners and have had no legal regard for the legal position and inaccurate claims made by some local residents.	The reference to Freemans Wood should be removed from the list of proposed sites.	Yes
148/14/SC4/LC/US3	Jon Power	CBRE on behalf of Lancaster University	Strategic Policies & Land Allocations DPD	Chapter 23	SC 04	N/A	LC	US/3	Policy SC4 identifies 'Lancaster University and the Eastern Fringes of Lancaster' as a greenspace network that should be protected from development. This area has not been defined on the Local Plan Policies Map.  Moreover, the opportunity to expand the developable area of the University is something that is currently being investigated to provide sufficient land for growth ambitions over the plan period. It is essential that a flexible framework is provided for the release of land around the University.	It is suggested that reference to this greenspace is removed from Policy SG4 and considered in more detail as part of the future DPD for the Garden Village.	Yes
043/01/SC4/LC/US1&3&4	Julian Handy	Maxon Gilbrand on behalf of The James Cottam Will Trust	Strategic Policies & Land Allocations DPD	Chapter 23	SC 04	N/A	LC	US/1 US/3 US/4	The onus is on the planning authority to provide a robust justification for the designation of land as Local Green Spaces. At present there is no explanation to why Over Ketlet Craggs and the surrounding fields warrant such a designation. Nor is there any reference to the test outlined by the NPPF or its associated guidance. Indeed there is no explanation give to why the area of farmland is included within the nominated area. Detail justification is provided within the representatives full response to why the site does not justify a Local Green Space designation.	Remove Over Ketlet Craggs and surrounding fields from the Local Green Space Designation.	Yes
021/03/12/LC/US1-4	David Alexander	N/A	Strategic Policies & Land Allocations DPD	Chapter 23	SC 04	N/A	LC	US/1 US/2 US/3 US/4	The approach taken towards Green Space Networks is strongly supports, however the list of sites identified in Policy SC3 is far from comprehensive and needs to be updated on a regular basis, a number of other sites such as Great Wood, Low Lane Wood and Peshale Gardens should all be added given their amenity value.	The addition of Great Wood, Low Lane Wood and Peshale Gardens to be added to the list of local green spaces in Policy SC2.  The shortage of green space in Morecambe needs to be given greater emphasis and more sites identified to address current deficiencies.	No
018/03/SC4/LC/US3	Brian Jones	Not Applicable	Strategic Policies & Land Allocations DPD	Chapter 23	SC 04	N/A	LC	US/3	The stretch of the River Lune and its banks between Skerton Bridge and the Canal Aqueduct should be added to the list of Local Green Space. [Further reasoning is provided in the full response]	This area identified as Local Green Space under Policy SC4.	Yes
051/19/SC5/LC/5	Dan Mitchell	Barton Willmore on behalf of H20 Urban LLP	Strategic Policies & Land Allocations DPD	Chapter 23	SC 05	N/A	LC	S	Our clients site at South Carnforth is identified as an area of deficiency and policy cites that further investigation to assess whether it can provide new or improved infrastructure will be undertaken. To facilitate this, we consider that based on the requirements set out by the Council in relation to infrastructure on the site that further release of land is required to accommodate the required levels of open space.	Further land is release for SG11 to accommodate open space requirements.	Yes
106/20/SC5/LC/5	Craig Barnes	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 23	SC 05	N/A	LC	S	Our client recognises the need for open space to be provided through Bailrigg Garden Village. This space should feature throughout the site to improve access for residents and create green corridors through the site. Any over concentration of open space and loss of residential development potential should be compensated for through the use of land equalisation agreements.	No suggested amendments made.	Yes
118/04/SC5/NLCS/US4	Nick Horsley	Mineral Products Association	Strategic Policies & Land Allocations DPD	Chapter 23	SC 05	N/A	NLC/5	US/4	This policy seeks the provision of recreational areas on land identified as mineral safeguarding areas in the adopted Mineral Safeguarding Map prepared by Lancashire County Council. This may or may not conflict with the principles of mineral safeguarding. However, Policy SC5 is reliant on residential development under Policies SG11, SG12 and SG13. The Sustainability Appraisal recognises the need to taken into consideration minerals issues yet neither plan or appraisal given sufficient consideration to the safeguarding of minerals. Safeguarding of minerals resources is a sustainable practice and accords with national policy.	Deletion of the reference to South Carnforth will ensure that the plan is sound in terms of the requirements of the NPPF as it applies to minerals safeguarding, the safeguarding of minerals infrastructure and the Green Belt.	Yes
100/12/SC5/LC/US1-2	David Barnes	Star Planning on behalf of Seemore Properties Ltd	Strategic Policies & Land Allocations DPD	Chapter 23	SC 05	N/A	LC	US/1 US/2	Seemore Properties question the relevance of this policy as it applies to the East Lancaster Strategic Site. The requirements for open space and recreational provision are established by other policies in the Local Plan so it is unclear why there is a need to include this site in any recreational opportunity area.  The principle of the creation of a new country park as part of the East Lancaster Strategic Site is supported. Such extensive areas of open space will provide effective mitigation for any potential recreational pressure on European Designated Sites.	Remove East Lancaster Strategic Site as a Recreational Opportunity Area.	Yes
163/11/SC5/LC/5	David Diggle	Turley on behalf of Peet Holdings Investments	Strategic Policies & Land Allocations DPD	Chapter 23	SC 05	N/A	LC	S	Peet support the delivery of recreational development within the plan. In respect of the Garden Village, Peet agree that this can be considered as part of the masterplanning process.	No suggested amendments made	Yes
078/04/T1/LC/US1-4	Peter Shannon	WYG on behalf of Drinkwater Mushrooms	Strategic Policies & Land Allocations DPD	Chapter 24	T 01	N/A	LC	US/1 US/2 US/3 US/4	Drinkwater Mushrooms note that Policy SG3 which seeks to ensure that infrastructure is delivered to facilitate growth in South Lancaster, for example the reconfiguration of Junction 33. Whilst we do not object to the principle of this policy, Drinkwater Mushrooms consider that more detail should be made available and be subject of consultation. As a significant business and landowner in the area, Drinkwater Mushrooms are a primary stakeholder in this process.  Reference is also made to a Park and Ride scheme however the need for this is yet to be proven. Therefore we would question the merit in such an approach that seeks to protect a broad, undefined, location for a use that is yet to be understood or justified. The policy must be redrafted to address this issue.	The protection of an undefined site for park and ride located in the vicinity of Junction 33 should be reconsidered.  Text should be added to paragraph 24.7 to provide confort that local businesses and landowners will be engaged in ay work for the reconfiguration of Junction 33.	Yes
106/21/T2/LC/US2-3	Craig Barnes	Barton Willmore on behalf of Storey Homes	Strategic Policies & Land Allocations DPD	Chapter 24	T 02	N/A	LC	US/2 US/3	Our client notes the requirement of Policy T2 for the delivery of a Cycling and Walking Superhighway related to the Garden Village. Whilst acknowledging that Bailrigg Garden Village is at a very early stage of planning, it is unclear what is meant by this term and how links would be achieved from this site into the City Centre.	Further information should be provided on the Cycling and Walking Superhighway.	Yes
169/14/T2/LC/5	Jonathan Wallace	Lichfields on behalf of Commercial Estates Projects	Strategic Policies & Land Allocations DPD	Chapter 24	T 02	N/A	LC	S	The DPD refers to opportunities relating to cycling and walking superhighway through the Garden Village to be explored through masterplanning. The A6 is identified as a key public transport corridor. This reflects the sustainability of the Scothorh Road site and that it can be delivered in an early phase of the Garden Village development.	No suggested amendments made.	Yes
018/02/T2/LC/US3	Brian Jones	Not Applicable	Strategic Policies & Land Allocations DPD	Chapter 24	T 02	N/A	LC	US/3	There should be a statement on recreational cycling and walking, especially in the wider countryside that comprises most of the district. The emphasis of the policy currently is on cycling and on linkages to and from new development in the urban core areas. There needs to be improvement to long distance cycle routes and protect / enhance foot routes near villages and rural development.	As described in the Summary.	Yes
182/01/T2&L3/LC/US3	Jim Nott	Inland Waterways Association Lancashire and Cumbria Branch	Strategic Policies & Land Allocations DPD	Chapter 24	T 02 T 03	N/A	LC	US/3	Concern is raised over the plan for a 'super highway for cyclists and walkers' in the Local Plan from Bailrigg to Carnforth where it is stated that a significant part of this involves using the canal towpath.  We are in favour of plans to encourage more cycling and walking and using the canal will certainly encourage this. Experience has taught us that improving towpaths can often give cyclists the opportunity to use canal towpaths as race tracks. As a user of the canal system I frequently encounter some cyclists speeding along the canal towpath causing distress to walkers and boaters.  It is noted that the creation of a cycle superhighway would involve discussions with the Canal and River Trust and we would welcome the opportunity to be involved in planning for the superhighway and to incorporate speed reducing features. A charging tariff is also mentioned and it would be interesting to see how this could be achieved and policed with some of the revenue from this being used to control speeding.	Further engagement is suggested with the inland waterways association in the designing of any cycling and walking superhighway.	No
163/12/T2-3/LC/5	David Diggle	Turley on behalf of Peet Holdings Investments	Strategic Policies & Land Allocations DPD	Chapter 24	T 02 T 03	N/A	LC	S	Peet notes the content of Policies T2 and T3 and support the proposals in principle and practical, however this should be considered in the context of wider benefits, costs and viability.	No suggested amendments made	Yes
122/13/T3/LC/5	Tim Bettany - Simons	Canal and River Trust	Strategic Policies & Land Allocations DPD	Chapter 24	T 03	N/A	LC	S	Policy T3 and supporting paragraphs 24.15 - 24.21 relate specifically to Lancaster Canal. The Trust fully support the inclusion of this standalone policy relating to the canal and will provide an appropriate mechanism to ensure that development responses appropriately to the waterway corridor.  The Trust consider that the structural integrity of our network and related infrastructure should be recognised, safeguarded and protected within this policy. [Further detail provided in the representatives full response.]	The Trust consider that the following further criteria be added to Policy T3:  'Development adjacent to waterways will not be permitted unless it can be demonstrated that it would not adversely impact on the structure integrity of the waterway or its related infrastructure and assets.'	No
199/01/T3/LC/US4	Alan Brindley	N/A	Strategic Policies & Land Allocations DPD	Chapter 24	T 03	N/A	LC	US/4	With regard to Lancaster Canal, there needs to be a 60m margin along the edge of the canal to preserve the green corridor and provide wildlife habitation. Its over development stretching too far out. The canls is a linear part and close housing opposive will destroy amenity.	Provide a 60m buffer between new development and the canal.	No
123/08/T4/NA	Diane Clarke	Network Rail	Strategic Policies & Land Allocations DPD	Chapter 24	T 04	N/A	N/A	N/A	Discussion with Network Rail is advised.  Within the Council are there remain a number of level crossings, many of which are public footpaths. With the potential for increased frequency of trains and passenger usage the transport assessments should include an assessment of proposals potential to impact upon a level crossing. Where level crossings may be impacted by development the Council and developers are requested to consider the volume and type of user. Impacts on level crossing should be considered prior to submission of a planning application. Mitigation of the impacts should be funded by developers. Development proposals that generate significant amounts of movement or impact on level crossings must be supported by a Transport Statement or Assessment. [Further detail provided in the representatives full response.]	No suggested amendments made.	No
163/13/T4/LC/5	David Diggle	Turley on behalf of Peet Holdings Investments	Strategic Policies & Land Allocations DPD	Chapter 24	T 04	N/A	LC	S	Peet notes the content of Policy T4 and support the proposal in principle and practical, however this should be considered in the context of wider benefits, costs and viability.	No suggested amendments made	Yes
167/04/KD/LC/5	Hannah Walker	Barton Willmore on behalf of SCP Consulting Ltd	Strategic Policies & Land Allocations DPD	Key Diagram	N/A	N/A	LC	S	Our client continues to support the identification of Carnforth as a key employment area, however the spatial strategy as set out in Policy SP5 does not promote Carnforth as a key employment area and does not allocate any new jobs in the town.	No suggested amendments made.	Yes
128/07/H1&EN6/LC/US1-4	Aqub Saghir	NIL Consulting on behalf of Persimmon Homes	Strategic Policies & Land Allocations DPD	N/A	H 01 EN 06	N/A	LC	US/1 US/2 US/3 US/4	Persimmon Homes are promoting the development of a site located on the edge of the Built up area of Bolton-le-Sands / Slynw-with-Hest. The site is currently located in the Green Belt. Persimmon have undertaken their own assessment of the Green Belt and have concluded that this area makes only limited contribution to Green Belt purposes.  Considering the housing shortfall and acknowledgement of the Council that it is unable to meet housing needs this site should be considered to provide residential development in the short term of this plan period. The site is not constrained, in a sustainable location and will not require extensive infrastructure works to be development. There should be no reason in planning policy terms to prevent this site from coming forward for development. [Further detail provided in the representatives full response.]	That land located on the edge of Bolton-le-Sands and Slynw-with-Hest be removed from the Green Belt and allocated for housing.	No
002/03/NLCS/US1-4	Geoff Storey	Aggregate Industries UK	Strategic Policies & Land Allocations DPD	N/A	N/A	N/A	NLC/5	US/1 US/2 US/3 US/4	The Local Plan Transport Assessment fails to take into account the likely increase of vehicle movements from Back Lane Quarry as a consequence of other mineral reserves being exhausted in Lancashire, the Yorkshire Dales and South Lakeland. The assessment fails to take account the NPPF minerals and minerals infrastructure safeguarding requirements.	No suggested amendments made.	Yes
002/04/NLCS/US1-4	Geoff Storey	Aggregate Industries UK	Strategic Policies & Land Allocations DPD	N/A	N/A	N/A	NLC/5	US/1 US/2 US/3 US/4	The Local Plan viability assessment fails to take into account the implications of the agent of change principle in relation to the proposed residential development in close proximity to safeguarded minerals and minerals infrastructure, reference is made to the Conrex UK v Richmondshire judgement attached.	No suggested amendments made.	Yes
113/01/LC	David Smurthwaite	Craven District Council	Strategic Policies & Land Allocations DPD	N/A	N/A	N/A	LC	N/A	<b>Representation refers to Duty to Cooperate Matters</b>  Craven District Council and Lancaster City Council are Duty to Cooperate partners have had regular meetings to discuss local plan preparation. The result of the ongoing engagement is that the Craven and Lancaster Local Plans broadly align. As a result of ongoing engagement there are no outstanding issues between the authorities. As such Craven District Council supports the Lancaster Local Plan Strategic Policies & Land Allocations DPD in that the policy approaches are complementary and the Duty to Cooperate provisions have been met.	No suggested amendments made.	No
113/02/LC/5	David Smurthwaite	Craven District Council	Strategic Policies & Land Allocations DPD	N/A	N/A	N/A	LC	S	Craven District Council have reviewed the additional evidence presented as part of this consultation and have no issues arising that are of concern, as such the Council supports the plan and the policy approach contained within it.  The Council remains satisfied that in particular there are no Duty to Co-operate matters arising from this consultation. Craven District Council therefore support the plan and evidence in principle and raise no objections as a consequence.	No suggested amendments made.	No
025/02/LC/5	Mark Evans	Fylde Borough Council	Strategic Policies & Land Allocations DPD	N/A	N/A	N/A	LC	S	<b>Representation refers to Duty to Cooperate Matters</b>  It is noted that although Lancaster City Council cannot deliver the OAI identified and some of it is not provided in this plan period, LCC have not requested assistance in meeting this need from any adjacent planning authorities. Fylde Council wish to be kept informed as the Lancaster Local Plan progress to submission and will continue to work with the City Council to meet the Duty to Cooperate.	No suggested amendments made.	No
076/04/NLCS/US1-4	Warren Hilton	Highways England	Strategic Policies & Land Allocations DPD	N/A	N/A	N/A	NLC/5	US/1 US/2 US/3 US/4	Highways England note that the Council submitted the Local Plan to the Secretary of State in May 2018 for independent examination. The examination starts on the submission of the DPDs to the Secretary of State and therefore the Inspector must consider the soundness of the DPDs as submitted.  It is recommended in the Procedural Practice in the Examination of Local Plans (2016) that the LPA rigorously assess the plan before it is published for consultation under Regulation 19 to ensure that it is a plan which they consider to be sound. The plan should focus relentlessly on the critical issues and strategies to address them, paying careful attention to deliverability and viability. The Planning and Compulsory Purchase Act specifically provides that a LPA must not submit the plan unless it considers the document to be ready for examination. The Inspector will take the published plan (and if relevant the addendum submitted with the plan to address matters arising from the public consultation on the plan at Regulation 19 stage) as the final word of the LPA on the plan. Therefore there is a very strong expectation that further LPA-led changes to the plan will not be necessary.  According to NPPG an assessment of transport implications should be undertaken at several stages in preparing the Local Plan. It should be an iterative provides that becomes more refined through the process itself and ultimately shaping its development rather than this being collected retrospectively and then trying to retrofit it to the development strategy. [Further detail provided in the representatives full response.]	No suggested amendments made.	

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Intert) ATTENDING EXAMINATION
076/05/NLCS/US1-4	Warren Hilton	Highways England	Strategic Policies & Land Allocations DPD	N/A	N/A	N/A	NLC/5	US/1 US/2 US/3 US/4	<p>We do not consider that the Transport Assessment provides a robust transport evidenc ebase and have concerns over the validity of the conclusions along with the scope and suitability of the identified mitigation affecting the strategic road network.</p> <p>The transport assessment does not considered planned major transport infrastructure and the findings suggest that some major transport infrastructure deemed as critical to the delivery of the Local Plan within the supporting infrastructure Delivery Plan is not required. In additional the Air Quality Position Statement acknowledges that more work will be required to fully understand where the impacts of proposed growth are likely to be and if the proposed mitigation will provide the necessary measures to offset this impact. We would welcome a clearer understanding of what development can take place using existing transport capacity and at what time interventions are required. We would also welcome continued dialogue with the Council to ensure that transport impacts of strategic areas of growth are appropriately assessed. [Further detail provided in the representors full response.]</p>	We request that the findings of the transport assessment are reviewed, using a strategic model and that mitigation requirements for the strategic road network are agreed with Highways England to ensure the continued safe and efficient operation of the strategic road network in Lancaster, something which avoids local trips being displaced onto the strategic road network.	
151/01/NLCS.6/US4	Matthew Symons	Hollins Strategic Land	Strategic Policies & Land Allocations DPD	N/A	N/A	N/A	NLC/6	US/4	<p><b>Representation refers to Duty to Cooperate Matters</b></p> <p>The Council have not met its Duty to Cooperate as it has not fully explored the possibility of assisting Wyre with its unmet housing needs. The Duty to Cooperate Statement of Compliance states that the Council have not met with Wyre since 2015 - Wyre have recently submitted their emerging plan to the Inspectorate with hearing scheduled for May.</p> <p>Lancaster City Council have informed Wyre that they cannot assist with its unmet need because it is having to release Green Belt in order to meet its own housing requirements. However, numerous non Green Belt sites have been identified within the open countryside.</p>	It is considered that while Lancaster CC have engaged with Wyre BC it has not positively addressed the possibility of assessing Wyre with its unmet need. Wyre has a shortage of housing land. Wyre are in the same housing market area as Blackpool and Ryde with neither able to assist Wyre in meeting its needs. It is considered that the delivery of housing in locations well related to Wyre, for example land off Preston / Lancaster Road, Galgate can assist Wyre in this regard.	Yes
097/01/NLCS.6	Joanne Harding	Home Builders Federation	Strategic Policies & Land Allocations DPD	N/A	N/A	N/A	NLC/6	N/A	<p><b>Representation refers to Duty to Cooperate Matters</b></p> <p>The HBF welcomes reference to the Duty to Cooperate, however currently the lack of detail within the documents regarding the actions that the Council have taken to meet its obligations under the duty.</p> <p>The Duty to Cooperate Statement of Compliance highlights that Wyre has asked Lancaster to take some of its housing growth and that this option has been declined. For other authorities the statement suggests that information has been shared. The primary concerns of the HBF are those associated with housing need and delivery and the role Lancaster can play in meeting its own needs and potentially those of others. [Further detail provided in the representors full response.]</p>	No suggested amendment made.	Yes
139/04/NLCS	Paul Tunstall	HWPC Planning on behalf of TNPG Sandeman Trust and M Capital Developments	Strategic Policies & Land Allocations DPD	N/A	N/A	N/A	NLC/5	N/A	<p><b>Representation refers to Duty to Cooperate Matters</b></p> <p>We expect future discussions between Lancaster and neighbouring authorities with regard to Duty to Cooperate and reser ve comment until the Examination. We understand the Wyre Local Plan is currently under the process of examination with hearings due to be scheduled for May 2018. Wyre district neighbours Lancaster and lies close to the site at Home Farm, Ellet. Wyre and Lancaster share a travel to work area and whilst in separate housing markets there are clear correlations.</p> <p>Wyre are also proposing a Local Plan which cannot meet housing needs due to highway capacity and flood risk. Both Wyre and Lancaster have sought to accommodate housing OAN shortfall in each other's district, with the potential outcome that both districts do not meet housing need. The ramifications of this to the housing market and economy cannot be unstated and we informed Wyre Council of the proposals for Home Farm abett the whole site lies within Lancaster.</p>	The Local Plan Strategy could be adapted with the introduction of an additional (standalone site(s) to meet the shortfall. Combined with the known housing shortfall in housing need proposed by the neighbouring district we propose that Home Farm Ellet is an excellent location for development to meet the needs of both district, either in term of actual delivered housing numbers in Lancaster or Wyre.	Yes
012/01/NA	David Thow	Wyre Borough Council	Strategic Policies & Land Allocations DPD	N/A	N/A	N/A	N/A	N/A	<p><b>Representation refers to Duty to Cooperate Matters</b></p> <p>Clarification required in paragraph 10.1, there has been close dialogue on the matters of housing requirements and it is acknowledged and agreed by both parties that neither council can assist in meeting any outstanding housing requirement. It has been agreed that the matter of any outstanding housing requirement will be a matter to be addressed for the appropriate public examination. This outcome should be accurately reflected in the statement.</p>	Clarification required in the Duty to Cooperate Statement of Compliance.	No
111/01/SG5&DM16/LC/US2-3	Matthew Sobic	Savills on behalf of the Roubals Group & Elston Holdings Ltd	Strategic Policies & Land Allocations DPD & Development Management DPD	Chapter 13 Chapter 17	SG 05 DM 16	N/A	LC	US/2 US/3	<p>Our previous representations have set out concerns over the need for impact testing any schemes which come forward via Policy S65 of the Plan. We note that amendments have been made to Policy DM16 of the Development Management DPD which have provided locally derived standards for impact assessment which are welcomed. However, the policy requirement should not relate to the creation of new floorspace within the primary shopping area.</p>	Request amendment to the policy that sets out that an impact assessment is required for proposals for the creation of 500sqm of floorspace within the defined City Centre boundary but not within the PSA.	
111/02/TC2&DM17/LC/US1-4	N/A	Savills on behalf of the Roubals Group & Elston Holdings Ltd	Strategic Policies & Land Allocations DPD & Development Management DPD	Chapter 19 Chapter 07	TC 02 DM 17	N/A	LC	US/1 US/2 US/3 US/4	<p>It is proposed that both Policies TC2 and DM17 and the Local Plan policies map are amended to remove any reference to primary and secondary retail frontages. As currently worded the policies are too restrictive and will not allow Lancaster City Centre to evolve in line with modern retail.</p> <p>The policy position of defining primary and secondary frontages has the potential to provide for an uncompetitive city centre environment that does not provide for customer choice and a diverse offer. The policy approach has the potential to harm the future prosperity and evolution of Marketgate to provide a key future role as Lancaster City Centre's principal commercial destination. [Further detail provided in the representors full response.]</p>	Primary and Secondary frontages should be removed from the Local Plan.	
077/01/LC/5	Liz Locke	Environment Agency	Strategic Policies & Land Allocations DPD & Development Management DPD	N/A	N/A	N/A	LC	S	<p>We have reviewed the Publication Documents and are satisfied that the Plan is sound, legally compliant and produced in accordance with the Duty to Cooperate.</p> <p>We note the acknowledgement of flood risk at allocated sites DOS1 and DOS4 and ask to be consulted on any subsequent masterplanning stages.</p>	No suggested amendments made.	No
123/01/NA	Diane Clarke	Network Rail	Strategic Policies & Land Allocations DPD & Development Management DPD	N/A	N/A	N/A	N/A	N/A	<p>Consideration should be given in Transport Assessments to the potential for increased footfall at railway stations as a result of proposed residential and employment development. Developments within the Local Plan should be accompanied by a Transport Assessment which includes the consideration of the impact of proposals upon level crossings with mitigation implemented as required. We would encourage the Council to adopt specific policy wording to ensure that the impact of proposed new development on the risks at level crossings are fully assessed by developers. Sustainable drainage proposals should take into account the impacts on adjacent railway infrastructure. [Further detail provided in the representors full response.]</p>	No suggested amendments made.	No
125/01/LC	Lorayne Wall	South Lakeland District Council	Strategic Policies & Land Allocations DPD & Development Management DPD	N/A	N/A	N/A	LC	N/A	<p><b>Representation refers to Duty to Cooperate Matters</b></p> <p>South Lakeland District Council consider both DPDs to be sound and legally compliant. South Lakeland District Council does not seek any of its housing needs to be met in Lancaster District. Lancaster City Council has worked closely with South Lakeland District Council during the course of preparation of the two Published DPDs and we considered that it has met the Duty to Cooperate in this regard. The two Councils have also cooperated extensively on the preparation of the Arncliffe &amp; Silverdale AONB DPDs.</p>	No suggested amendments made.	No
051/30/NLCS/US1-4	Ian Gilbert	Barton Willmore on behalf of H2O Urban LLP	n/A	N/A	N/A	N/A	NLC/3	US/1 US/2 US/3 US/4	<p>As a point of process, no explanation has been provided by the Council as to why it has sought to publish additional information and evidence at this late stage of the plan making process. It is not clear how the Local Plan can have been based on information which has been published circa a year after the document it is intended to support was published. In that regard it is not clear in what way the Council is asking consultees to consider how evidence affects the soundness of the Local Plan. Moreover, as set out in Regulation 19 and 35 of the Town and Country Planning Regulations 2012 the Local Plans should be published with all 'submission documents' relevant to the Plan. As such if the evidence being consulted upon is required to support the plan, that evidence should have been published alongside the Regulation 19 Local Plan.</p>	No suggested amendments made.	Yes
167/23/NLCS/US1&2&4	Hannah Walker	Barton Willmore on behalf of SCP Consulting Ltd	n/A	N/A	N/A	N/A	NLC/5	US/1 US/2 US/4	<p>It is concerning that the Council are consulting on new evidence nearly a year later and relying on this evidence to support the soundness of their local plan. The tests of soundness are clear that the thrust of preparing a positively sound plan is being based on proportionate and robust evidence.</p> <p>In our view the Local Plan should not rely on evidence that was not even published or produced until after it was submitted. It appears that the additional information has only been prepared to respond to comments submitted to the Submission Version of the Local Plan rather than providing a sound justification for the chosen strategy.</p> <p>The Plan should have been submitted on the basis that the Council considered it to be sound. The Council should not produce a suite of documents post-submission aimed at improving the Plan. The new evidence published as part of this consultation relates to fundamental topics that go to the heart of the Plan and notwithstanding earlier concerns raised by the Inspector regard the late changes to the Plan it is not clear whether this additional work has implications for the soundness of the Local Plan. Our client urges caution to the Council in relying on this evidence for the soundness of the Plan. [Further detail provided in the representors full response.]</p>	No suggested amendments made.	Yes
167/24/NLCS/US1&2&4	Hannah Walker	Barton Willmore on behalf of SCP Consulting Ltd	n/A	N/A	N/A	N/A	NLC/5	US/1 US/2 US/4	<p>The results of the transport assessment could not have been considered by the Council in proposing the site allocations in the Submission Version of the Plan.</p> <p>Chapter 1 of the Stage 1 Transport Assessment notes the major limitation of the study is the modelling work doesn't include an up-to-date Strategic Transport Model. The assessment is not, therefore, capable of modelling the overall transport impact of district-wide development, and infrastructure schemes nor can it reassign traffic across the highway network in congested conditions to avoid congested links. Essentially the Stage 1 Transport Assessment models a worst case scenario of adding together the highways impacts of individual development proposals.</p> <p>In addition, the Stage 1 Transport Assessment methodology (albeit agreed with the highway authority) appears to determine the impact of the Local Plan based in an assessment year of 2023. Our client does not agree with this approach. The assessment should be seeking to assess the highway impact of both planned development and infrastructure improvements at the end of the plan period.</p> <p>The Council has included the approved development of a Porsche showroom in Carnforth on our clients land. However, land at Warton Road which is allocated as a Development Opportunity Site has been excluded from the assessment and no justification has been given to its exclusion. This brings into question the robustness and reliability of the calculations and modelling in the assessment.</p> <p>Our client considers the methodology used for the assessment to be flawed, and therefore its conclusions to be flawed and cannot be relied upon to justify policies and allocations in the Local Plan. [Further detail provided in the representors full response.]</p>	No suggested amendments made.	Yes
167/25/LC/5	Hannah Walker	Barton Willmore on behalf of SCP Consulting Ltd	n/A	N/A	N/A	N/A	LC	S	<p>Our client support the evidence published by the Council to justify the protection of valued landscapes around the settlement boundary of Carnforth. It is important that these areas are preserved for enjoyment of future generations. However, what the designations demonstrate is that the opportunities for development on the edge of Carnforth or the expansion of existing employment sites is limited due to the protection offered by draft Policy EN7.</p> <p>As set out in our previous representation, our clients land to the north of Kellat Road is the only suitable, available and deliverable site that can deliver employment growth in Carnforth. Furthermore recent planning permissions in this area demonstrate that development can be accommodated in this location without having an adverse impact on the landscape. [Further detail provided in the representors full response.]</p>	No suggested amendments made.	Yes
167/26/NLCS/US1&2&4	Hannah Walker	Barton Willmore on behalf of SCP Consulting Ltd	n/A	N/A	N/A	N/A	NLC/5	US/1 US/2 US/4	<p>With regard to the Strategic Housing and Employment Land Availability Assessment (SHELAA), Our client is concerned that the assessment made in regard of their land (land north of Kellat Road) is incorrect and potentially misleading. It continues to state that permission is subject to a section 106 agreement relating to the proposed access. The Council claim that because the Section 106 agreement is yet to be signed off then it is not considered achievable.</p> <p>It should be clarified that permission was granted in May 2018 and was not subject to a Section 106 agreement. As such the principle of employment development of the site has been established. Furthermore, despite the Council's assertions, the access on to the M6 is not problematic and the highway authority have no objections to the proposed access arrangements. Since the planning application our client have worked with the highway authority to enable the declassification of the A601(M) as a motorway. Approval for this is expected to be issued in the next month.</p> <p>In summary the Council contend that the site is undeliverable because of problems with access and due to the absence of a signed 106 agreement. However this is not the case and the Council, through granting permission, accept that the site is accessible and achievable and the wider site is suitable for development.</p>	The site should be scored green for suitability, acheivability and availability and we ask the Council to reconsider their assessment based on the information provided above.	Yes
106/38/NLCS/US1-4	Ian Gilbert	Barton Willmore on behalf of Storey Homes	n/A	N/A	N/A	N/A	NLC/5	US/1 US/2 US/3 US/4	<p>In our view the Local Plan must not rely on evidence that was not published or produced until after the Local Plan was submitted. It appears the additional information has only been prepared to respond to comments submitted to the Submission Version of the Local Plan rather than providing sound justification for the chosen strategy.</p> <p>The plan should have been submitted on the basis that the Council considered it to be sound. The Council should not produce a suite of documents post-submission aimed at improving the plan. The new evidence published as part of this consultation relates to fundamental topics that go to the heart of the Local Plan and notwithstanding earlier concerns raised by the Inspector regarding the late changes to the Plan it is not clear whether this additional implications for the soundness of the Plan. [Further detail provided in the representors full response.]</p>	No suggested amendments made.	Yes
077/02/LC/5	Billy Dougherty (for and on behalf of Alex Hazel)	Environment Agency	n/A	N/A	N/A	N/A	LC	S	<p>We have considered the additional evidence and information and have the following comments and observations to make on the Lancaster City Coucil Local Site Screening Level 2 Strategic Flood Risk Assessment (Level 2 SFRA) prepared by consultants JBA.</p> <p>We note the Level 2 SFRA has assessed site LPSA B10 (Land off Imperial Way) for residential use. It is our understanding that the Local Plan has not allocated this site for residential use and that it is allocated for employment use in connection with the Port of Heysham.</p> <p>We would also like to make you aware that the UK Climate Projections 2018 was launched on the 26 November 2018, however as your Local Plan was submitted for Examination prior to its launch it is acceptable to use the allowances and advice published in February 2016.</p>	No suggested amendment made.	No
050/04/LC/5	Emily Hrycan	Historic England	n/A	N/A	N/A	N/A	LC	S	<p>With regard to the additional evidence consultation of January / February 2019, at this stage Historic England have no further comments to make.</p>	No suggested amendments made.	
139/05/NLCS/US1-4	Paul Tunstall	HWPC Planning on behalf of TNPG Sandeman Trust and M Capital Developments	n/A	N/A	N/A	N/A	NLC/5	US/1 US/2 US/3 US/4	<p>The fundamental principle of the Local Plan is that it is informed on robust evidence base from the outset, which one could argue is not the case here, particular where decisions have been made in relation to site allocations prior to the gather of this information now submitted as late evidence.</p> <p>In order to be considered sound, the plan must reconsider the allocation of all sites subject to this new evidence. Whilst we understand LPAs which not to reopen this debate, it would be a sensible compromise approach that the Examination Hearings consider omission sites from the outset in light of this new evidence.</p> <p>Our client maintains that the land at Home Farm, Ellet be identified to contribute to meeting housing need in the distict and have the potential to meet cross boundary housing needs, meeting some of the housing requirements for Wyre. [Further detail provided in the representors full response.]</p>	<p>We consider it appropriate that the Inspector reviews omission sites as part of the hearings to understand why sites have been excluded that could readily help in delivering the much needed increase in housing, particularly in the short term period when it is clear the plan presented does not intend to deliver new housing on new allocated sites in the next five years.</p> <p>Further delays to the examination process, and thus the delivery of housing could be avoided by considering all potential housing sites during the examination hearing process so the Inspector understands the level of housing that could be achieved if all potential sites are included.</p>	Yes

PINS REF	NAME	ORGANISATION	DPD	CHAPTER	POLICY	PARA	LEGALLY COMPLIANT	SOUNDNESS	SUMMARY OF RESPONSE (SOUNDNESS)	SUGGESTED AMENDMENT	(Intest) ATTENDING EXAMINATION
139/06/NLCS/US1-4	Paul Tunstall	WVPC Planning on behalf of TNPQ Sandeman Trust and M Capital Developments	2N/A	N/A	N/A		NLC/5	US/1 US/2 US/3 US/4	The Housing Land Monitoring Report clearly indicates a significant and severe shortfall of new build housing development in the short term against local plan targets, which are already well short of the OAN and highlights the significant flaws in the Local Plan strategy in terms of providing new housing growth. This information was available to the Council when they consulted on potential draft amendments to the Local Plan post submission, which sought to reduce the over plan targets and annual supply figure further. The status of the Council's position on this is somewhat unclear, but it does seem clear that the Local Plan strategy is flawed and will not deliver the level of housing below the OAN and that the Local Plan originally proposed as submission. [Further detail provided in the representatives full response.]	No suggested amendments made.	Yes
139/07/NLCS/US1-4	Paul Tunstall	WVPC Planning on behalf of TNPQ Sandeman Trust and M Capital Developments	2N/A	N/A	N/A		NLC/5	US/1 US/2 US/3 US/4	Home Farm Eiel is considered undeliverable in the 2018 SHLAA in relation to landscape and highways but this provides no assessment of the proposal presented through pre-application process (comments of which are attached to the full representation). There are significant concerns over the robustness of the 2018 SHLAA, details of which are set out in the representatives full response. [Further detail provided in the representatives full response.]	No suggested amendments made.	Yes
021/07/LC/US3	David Alexander	N/A	2N/A	N/A	N/A	N/A	LC	US/3	Paragraph 6.3 of the Air Quality Position Statement makes abundantly clear that the allocations in the Local Plan have the potential to increase traffic within both the AQMAs and elsewhere. This is all part of the wider environmental setting and context of the Local Plan and should be seen alongside Climate Change and biodiversity as key longer terms concerns that must be addressed within this Plan.  The Inspector needs to carefully assess development allocations to determine whether they are likely to facilitate air quality improvements or become a major contributor in themselves to poor air quality. The precautionary principle can be applied here to ensure that excessive housing allocations are not approved whilst at the same time encouraging complimentary measures.	No suggested amendments made.	No
052/02/C12/LC/US1-4	Rosie Morgan	N/A	2N/A	N/A	N/A	N/A	LC	US/1 US/2 US/3 US/4	Comments related not to the substance of the Plan itself but the consultation process. With the number of consultations on the same plan it is difficult to keep people enthused, engaged and up-to-date. Whilst I was made aware of this latest consultation via the City Council emails there were no public meetings or announcements in local newspapers, many older people do not have the internet and therefore find it difficult to find out information and respond.  I remain no clearer as to whether the Inspector will consider all the new evidence, including this consultation or whether he will still only consider the original plan. This is not a consultation designed to encourage public engagement, in fact I would suggest quite the opposite.	No suggested amendments made.	No
180/01/LC/5	Sacha Rossi	National Air Traffic Services (NATS)	2N/A	N/A	N/A	N/A	LC	5	NATS has no comments to make on the Local Plan.	No suggested amendments made.	No
007/03/NLC2-5/US1-4	Colin Griffiths	Satnam Planning Services	2N/A	N/A	N/A	N/A	NLC/2 NLC/3 NLC/4 NLC/5	US/1 US/2 US/2 US/2 US/4	The recent re-publication of the Submission Plan is unfortunate and confusing to those participating in the Local Plan preparation process. It appears that the suggested modifications from October 2018 have been withdrawn and no longer apply to the plan. We however understand and support the inspectors comments that the Examination is into the submitted plan, not subsequent modifications to it.  There is now a clear mismatch between the evidence supporting the plan and the policies contained within the plan. The mere fact that modifications were required strongly suggests that the submitted plan was not fit for purpose without modification and is therefore unsound as submitted.  This is a serious issue for the plan and in the spirit of transparency and efficiency the plan should be withdrawn and a revised submission plan prepared taking on board the findings of the revised evidence base and changed circumstances. [Further detail provided in the representatives full response.]	We would urge the Inspector to issue an interim finding that the submitted plan is unsound. The examination should be suspended whilst new submission plan is prepared.	Yes
193/01/NLC4/US1&3	Adam Mirley	Savills	2N/A	N/A	N/A	N/A	NLC/4	US/1 US/3	Concern raised about some of the cost assumptions adopted by Lambert Smith Hampton in the Local Plan Viability Assessment in relation to base build costs across new housing plus 20% for standard works and a contingency of 3-5%.  We believe that this cost is not reflective of the current development market, particularly in the Lancaster area. In our experience developers are experiencing difficulties in sourcing contractors and managing supply chains which drives up costs.  Based on our market exposure and knowledge, the base build costs across Lancaster are at the upper end of the range of costs for the region. This results in base build costs of £95-£100 per sq ft - rather than the £75 per sq ft suggested by Lambert Smith Hampton. Abnormal site specific costs are then incurred in addition to these costs.  We would also express concerns over the profit margin of 18% on GDV, in our experience house builders target a minimum return of 20% on GDV to reflect inherent construction risks and sales risks. [Further detail provided in the representatives full response.]	No suggested amendments made.	
029/09/LC/US1-4	Adam Key	Savills on behalf of the Bailrigg Farmland Trustees and Gladman Developments	2N/A	N/A	N/A	N/A	LC	US/1 US/2 US/3 US/4	With regard to the Transport Assessment, on behalf of Gladman Croft Transport Consultants have reviewed both the stage 1 and stage 2 assessments and would raise a series of points regarding the appropriateness of the methodology.  Firstly a strategic model has not been used. As such traffic generation assignment doesn't take into account for example short car trips. The traffic generation is therefore likely to be onerous. We would welcome confirmation from the Council that a strategic modelling exercise will follow.  The WYG analysis uses both growthed flows and development flows and as such there will be an element of double counting it also makes use of the TEMPRO traffic growth which also could result in double counting. It is not clear why 2033 has been used as a future year assessment when the Local Plan runs up to 2031. The build out rate assumptions are not explained and it seems as though there is an expectation that all of the sites will be fully occupied by 2033. There seems to be no justification for this approach. When it comes to matters of employment leakage, it is not clear how these figures have been derived and this should be clarified. The distribution of traffic from the various sites has been based on manual assignment which is only being done in the absence of a strategic model. This could lead to misleading results. [Further detail provided in the representatives full response.]	No suggested amendment made.	Yes
029/10/LC/US1-4	Adam Key	Savills on behalf of the Bailrigg Farmland Trustees and Gladman Developments	2N/A	N/A	N/A	N/A	LC	US/1 US/2 US/3 US/4	Our review of the Identified Sites Lancaster and Visual Assessment found that despite a fairly robust methodology that it is not a coherent assessment of the draft allocated site at Bailrigg Garden Village. There is a fundamental error in the confusion of two landscape character areas which pervades the assessment and makes it very difficult to understand.  Setting this aside, it is difficult to understand how the assessment reached its conclusion. The visual affects assessed for the Bailrigg Village area are considered to be of major adverse significance, although they ignore the sensitive receptors which were identified in this methodology such as public rights of way and refer to residential views only. Despite this, the conclusion that development 'should be possible across this strategic site' with the caveat that the key views and landscape features would need to be protected. This conclusion is consistent with the initial assessment of the site prepared by our client.  In relation to the landscape and visual assessment for the SHLAA our review has found that the purpose and benefits of the report is unclear. It was undertaken at a high level and does not contain a sufficiently robust methodology. The report considers the landscape and visual effect of developing some or all of the site but offers no mapping to the exact area of assessment cannot be determined.  In summary the additional evidence and information produced by Arcadis on behalf of the Council does not present a coherent view or further support the draft allocation, of which this site is part of. The additional evidence is contradictory both between evidence and, in the case of detailed landscape and visual assessment. It is therefore not clear as how the additional evidence will assist in clarifying the Councils intentions with respect to the draft allocation. [Further detail provided in the representatives full response.]	No suggested amendment made.	Yes
029/11/US1-4	Adam Key	Savills on behalf of the Bailrigg Farmland Trustees and Gladman Developments	2N/A	N/A	N/A	N/A	LC	US/1 US/2 US/3 US/4	In relation to the Housing Monitoring Report. Given the transitional arrangements outlined in the revised Framework, our clients simply remind the Council that the Plan will be tested against the requirements of the previous Framework.	No suggested amendment made.	Yes
029/12/US1-4	Adam Key	Savills on behalf of the Bailrigg Farmland Trustees and Gladman Developments	2N/A	N/A	N/A	N/A	LC	US/1 US/2 US/3 US/4	Lambert Smith Hampton have considered development viability in the local authority area. It comments that viability for the Garden Village will only be assessed through the Area Action Plan process. Again in our view this work needs to be undertaken at the earliest possible opportunity to build confidence that the necessary level of development within Lancaster can be delivered. It is not appropriate to delay this given that the Garden Village is to deliver nearly 30% of Lancaster's housing growth.	No suggested amendment made.	Yes
188/01/LC/US1-4	Paul Brett Smith	Vale of Lune Rugby Club	2N/A	N/A	N/A	N/A	LC	US/1 US/2 US/3 US/4	Whilst the Playing Pitch Assessment of the clubs needs is reasonably robust and accurate, there are some changes required. We believe that the recommendations for the future delivery of rugby in the district are not deliverable and, as the key deliverer of rugby opportunities in the district we cannot 'sign up' to them.  We believe that PPS does not make the best use of opportunities because it recommends the use of a 3G pitch which is already at capacity and is not currently approved for rugby use (without the funding mechanism to achieve this). It also requires a replacement for a grass pitch on the basis of three pitches being insufficient to accommodate all youth and mini teams at weekends. This analysis is on the assumption that all these teams wish to play on a Sunday morning which is not the case. The replacement of the grass pitch would be unnecessary to meet the needs of the rugby club.  We disagree with the current strategy proposed in the PPC, we believe a more sustainable and deliverable strategy is to provide a 3G pitch at the Vale of Lune RLFC. [Further detail provided in the representatives full response.]	That the Playing Pitch Assessment is amended to take account of the proposed strategy for rugby union needs in the district.	
187/01/LC/5	Chris Hill	Westgate Cricket Club	2N/A	N/A	N/A	N/A	LC	5	Writing as the secretary of Westgate Cricket Club in relation to the Lancaster District Playing Pitch and Outdoor Sports Strategy which (p58) refers to the security of tenure for both Westgate CC and Bare CC. Security of tenure is a major issue for the club, not only for the reasons mapped out in the Report but also to help us look for grant support from funders. We support the conclusions of the assessment on page 61.	No suggested amendments made.	
012/02/NA	David Thew	Wyre Borough Council	2N/A	N/A	N/A	N/A	N/A	N/A	With reference to the additional evidence and information. Wyre Borough Council have no additional comments to make on the Lancaster District Local Plan.	No suggested amendments.	No