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say

Developing a Local Plan for Lancaster District

Updated Consultation
Statement (Regulation 22)

Shaping
a better future

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1. INTRODUCTION

- 1.1 The Consultation Statement has been prepared in accordance with Regulation 18 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012. The Statement sets out how the Council considers it has fulfilled its statutory duty to consult and engage with the public on the preparation of the new Local Plan.
- 1.2 The Council is currently preparing a new Local Plan which consists of a Strategic Policies & Land Allocations Development Plan Document (DPD) and a revised Development Management DPD (updating the original DPD which was adopted by the Council in 2014).
- 1.3 The Strategic Policies & Land Allocations DPD will set out the future development needs for the district and will direct how these needs will be met, this includes providing for new housing, economic growth and other service provision. It will identify land which is worthy of protection for its economic, environmental or social value. The preparation of this DPD will set out a series of allocations for both development and for protection which will provide certainty to local residents, businesses and developers on the scale and location of new development through the plan period.
- 1.4 The Development Management DPD sets out a series of generic planning policies which will be used by the Council's Development Management team and Planning Committee in order to determine planning applications. These policies will be applicable to a wide range of development proposals across the district.

2. PURPOSE OF THIS DOCUMENT

- 2.1 This Consultation Statement provides a summary of the stages of engagement and consultation which the Council have undertaken in order to inform the preparation of the Strategic Policies & Land Allocations DPD and the Development Management DPD in order to address the requirements of national planning legislation.
- 2.2 For each stage of consultation, the Consultation Statement outlines:
 - Section 3: Who we consulted
 - Section 4: What we consulted on
 - Section 5: How we have engaged
 - Section 6: What issues were raised at Regulation 18 Stage and
 - Section 7: How the issues were addressed
- 2.3 Since the **Consultation Statement was first published in February 2018** the Council has continued to advance the Local Plan. **This Consultation Statement has been updated to reflect further updates following Publication and Submission of the Local Plan:**
 - Section 8: Updates following the Publication and Submission of the Local Plan - Regulations 19 and 22 (May 2018).
 - Section 9: Updates following consultation on Additional Evidence (February 2019)

3. WHO WE CONSULTED

- 3.1 Through the plan-making process, the Council have sought to engage with the widest range of individuals, communities, organisations and stakeholders who may hold an interest in, or may be affected by, the content of the of the DPDs to make sure that those parts were clear that:
- The purpose of the DPDs, the process of preparing it and how and when they may be affected;
 - How and when they can comment on and get involved in preparing the DPDs and what they can and can't influence;
 - How and when their comments will be taken into account by the Council and when they can expect feedback; and
 - The remaining stages in preparing the DPDs and further opportunities to comment.
- 3.2 The Statement of Community Involvement (SCI) was reviewed and adopted in November 2016 and reflects the 2012 Regulations. It sets out the Council's approach to engaging in preparing the Local Plan and in considering planning applications. The SCI identifies who we engage with. The table below is not exhaustive and is amended or added to as required.
- 3.3 In addition to the organisations set out in the table below the Council also consult with the general public, all Council Members, agents, developers and local businesses who sign up to the Council's Local Plan Consultation Database.
- 3.4 It is important that this Consultation Statement is read in conjunction with the Duty to Co-operate Statement of Compliance which sets out the Council's approach to engaging with neighbouring authorities.

Who we consulted	
Specific Bodies	
The Coal Authority	
The Environment Agency	
Historic England (Historic Buildings and Monuments Commission for England)	
Marine Management Organisation	
Natural England	
Office of Rail and Road (now called Office of Rail Regulation)	
Highways England / Highways Agency	
Adjoining Local Planning Authorities	<ul style="list-style-type: none"> • Barrow Council • Craven District Council • Lancashire County Council • Lake District National Park Authority • Ribble Valley Borough Council • South Lakeland District Council • Wyre Borough Council • Yorkshire Dales National Park Authority
Area of Outstanding Beauty	Arnsdale and Silverdale AONB Forest of Bowland AONB
County Council	Cumbria County Council (+ libraries in the Lancaster District) Lancashire County Council
Parish Council (s)	

Who we consulted	
Local policing body	Lancashire Constabulary
Relevant telecommunications companies	
Primary Care Trust or successor body	Clinical Commissioning Group
Relevant electricity and gas companies	National Grid (Electricity) National Grid (Gas)
Homes and Communities Agency (<i>now called Home England</i>)	
Relevant water and sewerage companies	United Utilities
Other Relevant Lancashire Councils	Lancaster City Councillors
General Bodies	
Canal & River Trust	Lancaster University
Campaign to Protect Rural England	National Trust
Church Commissioners for England	Network Rail
Civil Aviation Authority	North West Ambulance Service
Cumbria Wildlife Trust	Northern Rail
EDF Energy	Office for Nuclear Regulation
Electricity North West	Peel Ports
English Heritage	RSPB
Greater Manchester Minerals and Waste Unit	Sport England
Health & Safety Executive	Stagecoach
Heysham Nuclear Power Station	The Duchy of Lancaster
House Builders Federation	The Forestry Commission
Inland Waterways Association	One Voice 4 Travellers (Gypsy & Travellers)
Job Centre Plus	The Planning Inspectorate (only at publication stage via email)
Lancashire Fire and Rescue Service	The Theatres Trust
Lancashire Wildlife Trust	The Woodland Trust
Lancaster and Morecambe College	First TransPennine Express
Lancaster Canal Trust	University of Cumbria
Lancaster Chamber of Commerce	Virgin Trains
Lancaster Civic Society	

Table 3.1: Consultation Bodies consulted as part of the Local Plan (Extract from the Council's SCI – November 2016)

3.5 Further to the organisations listed above, the Council have sought to consult with the following other parties:

- General Public
- All Councillors
- Agents / Site Promoters / Development Industry
- Local Businesses

4. WHAT WE CONSULTED ON

Early Engagement Consultation Pre-2013

- 4.1 The Council have been working on the preparation of a Land Allocations DPD since 2010 and, prior to the publication of the National Planning Policy Framework in 2012 undertook a range of consultation events over how development should be delivered within the district. This also included a number of ‘Call for Sites’ exercises to understand land availability within the locality.
- 4.2 In 2010, the Council undertook a series of engagement exercises, which included a range of thematic groups which discussed a number of important planning topics such as housing, economic growth, renewable energy and impacts on the natural environment. In 2011 the Council consulted on a range of options for growth in a Land Allocations Issues and Options Paper which finally cumulated in the publication of a Preferred Options Land Allocations DPD and Development Management DPD in late 2012.
- 4.3 Ultimately, in relation to the Land Allocations DPD the Council took a decision that the approach taken to the delivery of new development (particularly housing) needed to be revisited in light of the new Framework. Whilst the Council advanced towards the adoption of the Development Management DPD, the land allocations element of the plan required further investigation particularly the calculation of an objectively assessed housing need for the district.
- 4.4 Further details on these engagement processes are set out in more detail within [Appendix B](#) of this statement and key dates and stages are described in [Appendix D](#).

Meeting Future Housing Needs Consultation (Summer 2014)

- 4.5 The Council recommenced their consultation on the new Local Plan in the summer of 2014 through the preparation of a Strategic Options Paper which identified a series of concepts in which growth could be delivered. The consultation did not seek to identify sites or specific areas of growth, it merely focused on people’s views on the following five options which could be used to deliver future development needs:
- A. Urban extensions to our main urban settlements.
 - B. The review of the North Lancashire Green Belt.
 - C. The dispersal of development across the rural areas of the district.
 - D. The significant expansion of some of the rural villages in the district.
 - E. The creation of a new town.
- 4.6 This consultation process set out a starting point for investigation of how future growth could be achieved in the district. Further details on these engagement processes are set out in more detail within [Appendix C](#) of this statement and key dates and stages are described in [Appendix D](#).

People Homes and Jobs Consultation (Autumn 2015)

- 4.7 In October 2015 the Council set out the next round of informal consultation on the plan-making process by publishing the ‘People Homes and Jobs’ paper. This again asked the community to consider approaches for meeting future development needs, however on this occasion the Council began to identify a series of locations across the district which could be used to accommodate such growth.

- 4.8 This consultation sought to refine the options originally consulted on in 2014, with two options – Rural Dispersal and the New Town options – discounted on the basis of the responses received both from members of the public and key stakeholders. These responses primarily related to the creation of unsustainable patterns of development and the lack of infrastructure.
- 4.9 The People Homes and Jobs paper set out a total 8 areas which could have been investigated for their ability to accommodate future development, this included the following sites:
- Urban Extension (UE1) – South Lancaster;
 - Urban Extension (UE2) – East Lancaster on land to the east of the M6 motorway;
 - Urban Extension (UE3) – East Lancaster on land to the west of the M6 motorway;
 - Green Belt (GB1) – North Lancaster Green Belt;
 - Green Belt (GB2) – East of Morecambe Green Belt;
 - Green Belt (GB3) – South Carnforth Green Belt;
 - Green Belt (GB4) – Central Area of Green Belt – Slyne-with-Hest; and
 - Village Expansion (VE1-VE8) – Dolphinhoelme.
- 4.10 The Council sought interested parties views on the suitability of the above sites in their ability to accommodate future development and deliver sustainable development. Further details on these engagement processes are set out in more detail within [Appendix C](#) of this statement and key dates and stages are described in [Appendix D](#).

Regulation 18 Consultation: Developing a Local Plan for Lancaster District (2017)

- 4.11 The Council consulted on a draft Local Plan in early 2017 which consisted of a Draft Strategic Policies & Land Allocations DPD and a revision of the Development Management DPD. This provided the first opportunity for members of the public and interested parties to comment on detailed proposals within the Local Plan. These proposals included specific site allocations (both for future development purposes and for protection), and specific policy approaches.
- 4.12 Similar to previous consultations, the draft Local Plan provided the opportunity to highlight how the plan-making process had been refined and taken account of previous rounds of consultation.
- 4.13 [Section 5](#) of this statement outlines how the Council engaged in this round of consultation, [Section 6](#) outlines what issues were raised and [Section 7](#) outlines how these issues have been addressed.
- 4.14 Key dates and stages are described in [Appendix D](#).

Site Specific Consultation

- 4.15 The Council has maintained an open dialogue with landowners, planning agents and the development industry throughout the preparation of the Local Plan with regards to the submission of potential development sites, with a number of ‘Call for Sites’ processes undertaken. The Council has also accepted the submission of sites outside of the general consultation processes and ‘Call for Sites’ periods.
- 4.16 In addition to the sites submitted to the Council for potential development, the Council have also received a number of representations from individuals and residents groups objecting to development in certain locations. The objections against sites have been taken into consideration in the responses to sites as set out in [Section 7](#) of this Consultation Statement. Further details of this

engagement and its outcomes are set out in more detail within [Appendix B](#) and [Appendix C](#) of this statement and key dates and stages are described in [Appendix D](#).

House Needs Survey

- 4.17 Arc4 were commissioned in 2017 to conduct a Housing Needs Survey with the aim to provide qualitative evidence of housing needs across the district to supplement the quantitative evidence provided as part of the calculation of objectively assessed needs. To evidence qualitative needs approximately 20,000 questionnaires were sent out to local residents to understand their current and future housing needs. Key dates and stages are described in [Appendix D](#).

Consultation on Methodologies for Preparing Evidence

- 4.18 The Council have undertaken a number of significant pieces of evidence which have informed the preparation of the Local Plan. To ensure that interested parties are engaged with the preparation of evidence and understand how such evidence is collected, the Council have consulted on the methodologies for a number of pieces of evidence which include:

- North Lancashire Green Belt Review;
- Sustainable Settlements Review; and
- Strategic Housing and Employment Land Availability Assessment.

- 4.19 Further details of this engagement and its outcomes are set out in more detail within [Appendix C](#) of this statement.

Sustainability Appraisal and Habitat Regulation Assessment

- 4.20 A Sustainability Appraisal (SA) has been undertaken and prepared alongside the Local Plan by independent consultants Arcadis (formerly Hyder). The SA describes the methodology by which the sustainability of the evolving strategy and policies of the Local Plan have been assessed and describes how the appraisal has informed the selection of sites and drafting of policies within the Plan.
- 4.21 The SA considers the individual and cumulative impacts of sites and policies on sustainability objectives considering their social, economic and environmental impacts. Where potential adverse impacts have been identified mitigation measures have been included within the plan to remove or mitigate against them.
- 4.22 A Habitat Regulation Assessment (HRA) has also been undertaken. Under Article 6 of the Habitats Directive (and Regulation 102 of the Habitats Regulations) an assessment is required where a land use plan may give rise to significant effects upon a Natura 2000 site (also known as European sites). These include Special Areas of Conservation (SAC), Special Protection Areas (SPAs) and Ramsar sites.
- 4.23 Initial screening of the Local Plan was undertaken by independent consultants Arcadis. This identified the likely impacts on a European site of the plan, either alone or in combination with other projects or plans, and considered whether these impacts may have a significant effect on the integrity of the sites qualifying habitats and/or species. Whilst a number of sites and policies were screened out for further assessment a number of sites were identified as having potential, either alone or in combination, for likely significant effects on European sites triggering the need for Appropriate Assessment and a more detailed assessment of their impact on the integrity of the European Site.

- 4.24 Having undertaken the Appropriate Assessment Arcadis are confident that with the mitigation measures proposed and now included within the Plan there will be no adverse effects on the integrity of the European sites.
- 4.25 The SA and HRA have been prepared in dialogue with key stakeholders including the three statutory consultees (Natural England, Environment Agency and Historic England). Key dates and stages are described in [Appendix E](#).

Health and Equalities

- 4.26 The Council has consulted directly with a range of community groups and organisations by contacting them by letter or email. This has included organisations representing particular social groups including faith groups, people from a minority ethnic backgrounds, people with disabilities and particular age groups, include the young and older people. The Council have prepared an Equalities Impact Assessment which provides an assessment of how the content of the Local Plan has positive or negative effects on equality matters and, where negative, these impacts can be mitigated.
- 4.27 The Council have also liaised closely with Lancashire County Council's Public Health team to ensure that the content of the Local Plan is considered for its positive and negative effects on matters of health, again where negative impacts have been highlighted the Council have sought to refine the DPDs to mitigate such impacts. Key dates and stages are described in [Appendix D](#).

Duty to Co-operate

- 4.28 The Duty to Co-operate process was introduced by the Localism Act 2011 and places a legal duty on local authorities and other public bodies to engage constructively, actively and on an on-going basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross-boundary matters. A separate Duty to Co-operate Statement of Compliance has been prepared which outlines how the Duty has been satisfied for the preparation of the Local Plan.

Updating and Reviewing the Evidence Base

- 4.29 Alongside the consultation work the Council have been preparing a robust and relevant evidence base which underpins the decisions made on land allocations and wider policy within the Local Plan. A series of assessments and studies have been undertaken by the Council or, alternatively the Council have commissioned outside consultants to undertake such work to inform the preparation of the Local Plan. These have included:
- Lancaster District Employment Land Review (Turley Economics 2014)
 - Lancaster District Economic Prospects Update (Turley Economics 2017)
 - Lancaster District Independent Housing Requirements Study (Turleys 2015)
 - Objectively Assessed Housing Needs Verification Study (Turleys 2018)
 - Strategic Housing Market Assessment (Part II) (arc4 2018)
 - Gypsy and Traveller Accommodation Assessment (arc4 2017)
 - Strategic Housing and Employment Land Availability Assessment (Lancaster CC 2018)
 - Sustainable Settlement Review (Lancaster CC 2016)
 - Strategic Flood Risk Assessment (JBA 2017)
 - Ecological Assessments (Greater Manchester Ecological Unit 2017)
 - Archaeological Assessments (Lancashire Archaeological Advisory Service 2017)
 - Landscape Assessments (Arcadis 2017 / 2018)

4.30 Further to the evidence outlined above, the Council have consulted on a series of additional evidence produced post Submission in January / February 2019, this included:

- Transport Assessment – Stages 1 and 2 (White Young Green 2018)
- Local Plan Viability Assessment - Stages 1 and 2 (Lambert Smith Hampton 2018)
- Lancaster District Open Space Study (Knight, Kavanagh & Page 2018)
- Lancaster District Playing Pitch and Outdoor Sports Strategy (Knight, Kavanagh & Page 2019)
- Landscape, Townscape and Visual Field Summary Report (Arcadis 2018)
- Key Urban Landscape Review (Arcadis 2018)
- Urban Setting Landscape Designations Assessment (Galpin Landscape Architecture 2018)
- Level 2 Strategic Flood Risk Assessment (SFRA) (JBA 2018)
- Air Quality Position Statement (Air Quality Consultants 2018)
- Housing Land Monitoring Report (Lancaster City Council 2018)
- Housing Standards Paper June (Lancaster City Council 2018)
- Lancaster District Inclusive Growth Report (Hall Aitken 2018)
- Strategic Housing and Employment Land Availability Assessment Report (Lancaster City Council 2018)

4.31 Full details of all evidence which has been prepared to inform the Local Plan can be viewed via the Council's website and in the Document Library. Further information on the additional evidence consulted on in January 2019 and the response to this consultation can be found in [Section 9](#) of this Statement.

Local Green Space

4.32 In March 2012 the Government, through the National Planning Policy Framework (NPPF), introduced a new Local Green Space designation. This designation allows local communities, through the Local Plan process, to identify areas of local green space which are important to them and which should be provided special protection.

4.33 Whilst the council has already undertaken a substantial audit of existing areas of green and open space provision across the district, it is recognised that Local Green Spaces are something different. They are designed to identify those areas of the district which are demonstrably special to the community and which if designated in the Local Plan, would be provided an additional level of protection. The Government have made it clear that the designation will not be appropriate to most green areas or areas of open space.

4.34 As a starting point for identifying potential areas Officers prepared and consulted on a Local Green Space Methodology in January 2015. Comments received during this consultation informed the preparation of the final methodology.

4.35 Following this the council undertook a call for site exercise in April 2015 inviting the community to submit sites which they would like to be considered as a Local Green Space in the Local Plan. In total, 56 applications were received as part of the first round of submissions. Another call for sites exercise was opened in June 2016, and a further 10 applications were received, with 2 additional sites nominated through the draft Local Plan consultation which was held January 2017 until March 2017.

- 4.36 Whilst areas of open space and environmental value have always been identified by the council, Officers recognise that designation as a Local Green Space is something different and will not be appropriate for all areas. The NPPF itself makes it clear that Local Green Spaces will not be appropriate for most green areas or areas of open space and should only be used in the following circumstances:
- Where the green space is in reasonably close proximity to the community which it serves;
 - Where the green area is demonstrably special to the local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
 - Where the green area concerned is local in character and is not an extensive tract of land.
- 4.37 In line with the NPPF Officers established four tests for assessing submitted sites. Only if a site passes the first three tests does it progress to test 4. Under test 4 it must be demonstrated why a site is considered to be demonstrably special having regard to its beauty, historic significance, recreational value, tranquillity, richness of wildlife or another specified reason.
- 4.38 The first three tests of the assessment were undertaken by Officers with the final more subjective test being undertaken by the Local Green Space working group. This included representatives from the Lancaster Greenspaces group and other officers within the council. The group met on several occasions, and in October 2016, and then again in October 2017, a meeting was held to decide which of the sites passed all four tests and were considered demonstrably special to the local community. These sites were then put forward for allocation as a Local Green Space in the Local Plan.
- 4.39 A Local Green Space Assessment Summary Report has been produced for the first round of submissions and this is available to view on the Council's website. This report is currently in the process of being updated and finalised to include the most recent sites which have been nominated. This will be available to view shortly as part of this consultation.

Statement of Community Involvement (SCI)

- 4.40 The initial Statement of Community Involvement (SCI) was a formal document which was subject to both public consultation and independent examination and approved in June 2006. Changes to the planning system have reduced the formality of this document and makes its preparation quicker and more flexible to review and adopt.
- 4.41 When considered appropriate, the Council will seek to review the SCI and if necessary revise the document in the future to reflect current Council priorities, resourcing issues and emerging guidance at a national level. The SCI was reviewed and updated in October 2013 and again in November 2016.

5. HOW WE ENGAGED

- 5.1 Table 5.1 below outlines the consultation methods adopted throughout all stages of the plan-making process in order to satisfy the requirements of a Regulation 18 consultation and to ensure that the requirements of the Council's Statement of Community Involvement have been met.

Requirements of Regulation 18 Consultation Statement in accordance with Town and Country Planning (Local Development) Regulations 2012	How the Council satisfied the requirement
Which bodies and persons the local planning authority invited to make representations under regulation 18.	<p>Planning Policy Consultation Database consultees were notified on the opportunities to participate in preparation of the new Local Plan.</p> <p>The database consisted of residents and organisations who had been consulted on previous policy matters, those that had requested for inclusion and statutory bodies for which the Council must satisfy commitments to engage in ongoing duty to co-operate obligations.</p>
How those bodies and persons were invited to make representations under regulation 18.	<p>Consultation ran for 8 weeks from 27 January 2017 to March 2017.</p> <p>This included a period of publicity across the Lancaster District, with a Consultation Booklet and a public notice placed in Lancaster Guardian (a local newspaper) on Thursday 26 January 2017. A number of press releases were also issued.</p> <ul style="list-style-type: none"> • 27 January 2017 • 14 March 2017 <p>Further details on the publicity methods are set out in more detail within Appendix A</p> <p>Emails sent to 1,819 consultees on the Planning Policy consultation database with a further 326 letters delivered to participants without access to email and to local businesses by post.</p> <p>1,500 posters and 1,500 postcards were distributed to council buildings, care home, restaurants, libraries, school, and many other venues across the district. Further details can be found in the 'Developing a Local Plan for Lancaster District' Consultation Report June 2017: Appendix 1: Promotion and Events Details</p> <p>15 Public Drop in Events and a Business Breakfast took place over the 8 week period.</p>

Requirements of Regulation 18 Consultation Statement in accordance with Town and Country Planning (Local Development) Regulations 2012	How the Council satisfied the requirement
	<p>Information on the consultation was published on the Council webpages and copies of the consultation documents were made available at the 'Principal Offices'.</p> <p>Section 5 of this statement outlines how the Council engaged in this round of consultation, Section 6 outlines what issues were raised and Section 7 outlines how these issues have been addressed.</p>
A summary of the main issues raised by the representations made pursuant to regulation 18.	<p>The main issues raised in the representations are summarised in Section 6 of this document.</p> <p>Summary paragraphs were generated through identifying general themes within the responses which allowed them to be grouped together. However, it should be noted that the Council has considered and taken account of every individual comment.</p> <p>Full details on the main issues raised and an officer responses are set out in the 'Developing a Local Plan for Lancaster District' Consultation Report June 2017: Appendix 2- Summary Consultee Responses</p>
How any representations made pursuant to regulation 18 have been taken into account.	<p>The Council has responded to each comment submitted to the Council following the period of consultation. Replies also outlined how the comments have informed the Local Plan.</p> <p>Section 5 of this statement outlines how the Council engaged in this round of consultation, Section 6 outlines what issues were raised and Section 7 outlines how these issues have been addressed.</p>

Table 5.1: Regulation 18 Consultation Procedure

6. WHAT ISSUES WERE RAISED AT REGULATION 18 STAGE?

- 6.1 Consultation on the Draft Local Plan (Strategic Policies and Land Allocations DPD and the Development Management DPD) provided the first opportunity for members of the public and interested parties to comment on the finer detail of the emerging Local Plan for the district. There were 363 separate consultee responses raising 1,577 comments. Given the wide breath and scope of the Local Plan, the range of responses received were varied and the level of detail provided extensive. However, despite this variation a number of trends and patterns in the comments can be seen and are set out in more detail within this document.
- 6.2 As with previous consultation exercises, there remains a lack of confidence in the validity and robustness of the objectively assessed housing need (OAN) and how it has been expressed in the plan. In relation to the local community, it was the general view that the scale of housing proposed was overly excessive with a suggestion that the projections used remain incorrect and overly optimistic. In relation to the development industry, there was concern that the Local Plan was not doing enough to deliver the evidenced housing needs in the district and that further land should be identified to provide more opportunity and flexibility to meet needs.
- 6.3 There was a strong view from the local community that the aspirations for economic growth in the district was overly optimistic. The reasons for this view varied from the uncertainties raised from the BREXIT process to the view that the district was in economic decline and changing this decline would be impossible to achieve. There was also some concern from the development industry that insufficient land had been identified to meet future economic needs and aspirations of the local business community.
- 6.4 As with previous consultations, a key concern was the delivery of infrastructure in terms of how it would be delivered and the costs of infrastructure. The concerns over infrastructure relate to education, highways, healthcare, open space and other local service provision.
- 6.5 Overall, whilst there was support for some of the sites, the majority of residents within the vicinity of proposals objected to proposed development and suggested that other areas of the district were more suitable for development. For example a consistent response from objectors to the Bailrigg Garden Village was that the draft Local Plan had not appropriately considered reasonable alternatives, in particular that development would be better located along the Bay Gateway in North Lancaster and Heysham.
- 6.6 Other alternatives were also suggested, a number of respondents highlighted the need for the draft Local Plan to prioritise the use of brownfield sites in order to meet development needs. Responses from individuals objecting to the use of Green Belt land, suggested that an insufficient assessment of alternative sites outside of the Green Belt had taken place and therefore there were no exceptional circumstances to justify using Green Belt land.
- 6.7 A consistent response from the development industry suggested that the draft Local Plan places a heavy reliance on the delivery of strategic greenfield sites which require significant infrastructure (in particular Bailrigg Garden Village) that will delay their delivery. They suggest that, with this in mind, the Council should be promoting a greater range of development sites to ensure that delivery is secured in the short-term and housing delivery can be significantly boosted as quickly as possible.

- 6.8 A number of responses related to the settlement hierarchy identified in the draft Local Plan (Policy SP2) and in particular the future role of ‘sustainable settlements’ in helping to provide future housing needs. A number of responses suggested that the settlements in which they live or have a specific interest in were no longer considered to be sustainable and therefore should not be contributing to future needs. A view from the development industry was that there should be a wider distribution of development across settlements in order to boost housing delivery.
- 6.9 In contrast to the 2015 consultation, the majority of the feedback received from local residents has been in relation to proposals at South Lancaster/Bailrigg Garden Village. In addition to the issues already described, key concerns have been around the lack of detail, misunderstandings over terminology of the Garden Village status, the threat of settlements merging, the scale of development and its potential impacts. A number of Galgate residents criticised the consultation process suggesting there had been a lack of community involvement and consultation on the Council’s Expression of Interest in a Garden Village.
- 6.10 A key concern from the development industry related to the potential impacts on viability. Concern was raised that new development will be expected to fund (either in full or in part) the required infrastructure. Whilst there was no objection in principle to development contribution towards infrastructure needs, concerns were raised that the impacts on development viability had yet to be tested.
- 6.11 There has been support for the reconfiguration of Junction 33, particularly in relation to the redirection of motorway traffic away from Galgate. However, there has been concern raised over the lack of detail of the proposal and the associated costs which are involved. Many have suggested that the proposed link road should be located on the eastern side of the M6, rather than to the west, in order to avoid proximity to residential areas. Highways England have also raised concerns over the future role of the M6 as a route for local traffic to travel between South Lancaster and the Heysham/Morecambe area.
- 6.12 A range of new sites have been suggested to the Council for consideration in the next version of the plan, these include further employment sites around Junction 34 at Carnforth and at White Lund. A number of new housing sites have been suggested, particularly in the Caton and Galgate areas. The largest of these sites has proposed a further extension to the Garden Village on land directly to the west of Junction 33 of the M6, this proposal in particular could generate in the region of 1,000 new homes. These are described in more detail under [Section 7](#) of this Consultation Statement.
- 6.13 The aggregates industry based in Carnforth have set out strong concerns about the new development proposals in the South of Carnforth, in that it will constrain future quarrying use and may lead to increased complaints over their operations.
- 6.14 The need to protect, enhance and assess built and archaeological historic assets has been highlighted including Slyne, Maritime Museum, Morecambe Platform and Lancaster Canal. Denny Beck has also requested to become a conservation area.
- 6.15 Key concerns about the proposed sites can be summarised as:
- Scale of proposed strategic sites (specifically south Lancaster);

- Lack of infrastructure (i.e. road network, capacity and safety, education, transport, health care and retail and associated costs);
- Impacts on environment, habitat and wildlife (i.e. ancient woodland and protected species);
- Flooding/drainage issues;
- Negative impacts on rural character and landscape;
- Risk of merging towns and villages/need to maintain separation;
- Loss of/need to protect agricultural/greenfield/Green Belt land;
- Prioritisation of brownfield sites;
- Impact on heritage assets;
- Traffic congestion and pollution issues including rat running in the East Lancaster area;
- Urban expansion not a 'Garden Village';
- Proposed motorway junction/bypass location (east rather than west);
- Protection and enhancement of canal areas;
- Housing quality, type and design including affordable and energy efficient housing; and
- Lack of detail available during consultation.

7. HOW THESE ISSUES WERE ADDRESSED

- 7.1 As highlighted in Section 6 of this statement, the Council received a range of responses to the content of the draft Local Plan, below these issues are set out in more detail and an explanation provided to how these issues have been dealt with in the preparation of the Publication version of the Local Plan.

Lancaster District Settlement Hierarchy

- 7.2 Policy SP2 of the Strategic Policies & Land Allocations DPD sets out a settlement hierarchy of how development should be directed through the plan period, setting out which settlements could and should accommodate future development. The largest settlements of Lancaster, Morecambe, Carnforth and Heysham are considered to be most appropriate for future growth (subject to sufficient opportunities to do so). The settlement hierarchy also identifies a number of rural 'sustainable settlements' which have sufficient facilities, services and accessible to accommodate some future growth.
- 7.3 A number of responses were received which objected to the inclusion of some settlements as 'Sustainable Settlements'. Objections were also received that some settlements which were not included as sustainable settlements should have been identified.
- 7.4 To ensure a consistent approach, and that the settlement hierarchy uses the most up-to-date information to base its decisions on, the Council have prepared a Sustainable Settlements Review to inform the finalised version of the settlement hierarchy. The Review looks at the existing service provision, its accessibility to other settlements and its future potential to grow in order to determine whether settlements should be considered as 'sustainable' with regard to the hierarchy.
- 7.5 This review and the incorporation of its findings into Policy SP2 mean that the Council are confident that the settlements outlined as 'Sustainable Settlements' represents an accurate and up-to-date reflection of this matter. This document can be viewed on the council website or in the Document Library.

Priorities for Economic Growth

- 7.6 There was a view from the comments made by the local community that the aspirations for economic growth in the district was overly optimistic. The reasons for this perception varied from the uncertainties raised from the BREXIT process to the view that the district was in economic decline and changing this decline would not be possible. These views were entirely based on perceptions and little evidence was offered to justify such a view. The views that the Council were overly optimistic in opportunities for economic growth were in most cases linked to the lack of need for new housing.
- 7.7 Over recent years the Council have collated wide ranging evidence on current levels of employment and opportunities for economic growth. This evidence is consistently considered to highlight the positive opportunities for economic growth in the district building on existing assets such as Lancaster University, the Port of Heysham, Heysham Nuclear Power Station and taking advantage of the new Bay Gateway. Evidence highlights the significant growth in job numbers over recent years and the opportunities for further growth through the plan period.
- 7.8 The Council have undertaken further updates to their understanding of economic growth via the Economic Prospects Update in 2017 which reviewed the opportunities for economic growth within the district. This reaffirms the view that Lancaster District still have significant opportunities for economic growth. Further details on the evidence behind this matter, and the implications of this within the Local Plan can be found in the Council's Background Paper 3: Achieving Sustainable Economic Growth in Lancaster. This document can be viewed on the council website or in the Document Library

The Delivery of New Homes

- 7.9 As with previous consultation exercises there remains a lack of confidence from the wider public in the validity and robustness of the objectively assessed housing need (OAN) and how it has been delivered in the Local Plan process.
- 7.10 In relation to the local community, there was concern that the scale of housing proposed in the draft Local Plan was excessive and its need not appropriately justified. The robustness and the validity of the 2015 Independent Housing Requirements Study was again referred to suggesting that the projections were incorrect and overly optimistic.
- 7.11 The responses to the draft Local Plan approach to housing delivery varied greatly. In stark contrast to the local community's perception of housing needs, the development industry registered concerns that the draft Local Plan was not being positive enough towards meeting needs for new housing. A number of responses highlighted that the draft Local Plan had failed to address the identified OAN for the district of between 13,000 and 14,000 new homes over the plan period (which equated to roughly 675 new homes per year).
- 7.12 Since consultation on the draft Local Plan, the Council have recommissioned Turley to seek verification of the OAN to ensure that the recommendations made in October 2015 (part of the Independent Housing Requirements Study) remain applicable and appropriate to the Local Plan at Publication Stage. The verification work has been able to take account of changes to the demographic projections, economic growth and changes to Government policy.

- 7.13 So far the verification work suggests that whilst there has been a modest downshift in overall need, from 675 to 615 homes per year. Given the scale of development proposed in the Local Plan, at 522 homes per year is lower than both OAN figures this change has little impact on the overall direction of the Plan itself. Further details on the evidence behind this matter, and the implication of this within the Local Plan can be found in the Council's Background Paper 2: The Delivery of Housing Need in Lancaster District. This document can be viewed on the council website or in the Document Library.

The Consideration of Reasonable Alternatives

- 7.14 A number of responses suggested that insufficient consideration has been given to how development should be distributed through the district. These responses fell specifically into two groups:
- Respondents to the Garden Village proposal suggested that this was not a suitable area for future development and that new growth should be directed towards the new Bay Gateway, in particularly North Lancaster and Heysham.
 - Respondents to changes to the Green Belt suggested that insufficient consideration had been given to the suitability of sites outside of the Green Belt and that exceptional circumstances to trigger changes to the Green Belt had not been justified.
- 7.15 As demonstrated in [Section 4](#) of this statement, the Council have consulted and considered extensive opportunities for the distribution of development within the district, whether this be broad concepts for growth (as consulted on in 2014) or more site specific options (as consulted on in 2015 and 2017).
- 7.16 Through the preparation of the draft Local Plan the Council have sought to maximise opportunities for growth along the Bay Gateway through the allocation of Green Belt land in North Lancaster and the expansion of economic opportunities at Heysham Gateway. The only land along the Bay Gateway which has not been considered for development is land east of Heysham which is located in flood zone 3 (i.e. at the highest risk of flooding) and land to the north of the Bay Gateway in Lancaster, which is considered to be of importance to the wider integrity of the North Lancashire Green Belt.
- 7.17 The 2016 North Lancashire Green Belt Review, prepared by the City Council (and assisted by consultants ARUP) provides a comprehensive and thorough assessment of the value of the Green Belt against the five purposes of this designation as set out in the National Planning Policy Framework. The Council have gone to significant lengths to identify land outside of the Green Belt and sought to allocate all suitable sites outside of the Green Belt which represent sustainable development for future growth opportunities. Despite this, further opportunities need to be identified with land in the Green Belt identified to meet some of this need.
- 7.18 Further details in the evidence behind assessing reasonable alternative can be found in the Council's Background Paper 1: Assessing the Reasonable Alternative – Informing the Spatial Distribution of Development. This document can be viewed on the council website or in the Document Library.

Strategic Sites

- 7.19 Of key interest within the consultation on the draft Local Plan was the identification of a range of strategic greenfield sites, including Bailrigg Garden Village, land to the East of Lancaster, land to the North of Lancaster and land in South Carnforth.

Bailrigg Garden Village

- 7.20 The proposal for Bailrigg Garden Village, as identified in Policy SG1 of the draft Local Plan will include provision for in the region of 3,500 new homes, a number of employment opportunities including Lancaster University Health Innovation Campus and other business parks and the creation of a new local / district centre which associated infrastructure and facilities. The Garden Village proposal will benefit from the reconfiguration of Junction 33 of the M6 which will involve the splitting of current junction arrangements and, as a consequence providing both a strong access to the strategic road network for the Garden Village and a bypass of Galgate to motorway traffic. The details of new highway works in this area continue to be investigated by the City Council, Lancashire County Council and Highways England.
- 7.21 The majority of responses to the consultation related to the development of Bailrigg Garden Village, with limited response on any other strategic sites proposed. In addition the Council received two petitions from the residents of Bailrigg, Burrow and Ellel area. The main areas of concern for the local community include the following issues:
- Lack of confidence in projected housing and employment figures, suggesting that they are flawed and too optimistic;
 - The excessive scale of the development being proposed;
 - That the proposal did not meet the Government's 'Garden Village' criteria and that what was being proposed was merely an urban extension which would attract commuters from outside the district;
 - That insufficient detail had been provided in the consultation and that the consultation period was too short. Details which would have been appreciated included the development areas, areas of green space, details on infrastructure – particularly the road network and the Junction 33 reconfiguration and environmental assessments;
 - That the proposal would have significant impacts on local infrastructure, in particular the local road network, local schools, healthcare and retail services. Concerns were also raised over the significant infrastructure costs associated with the proposed development;
 - Increased impacts on and safety of the local highway network and the lack of highway capacity to accommodate future growth;
 - Importance of retaining a substantial green buffer (free from development) between Galgate and the proposed development;
 - Many respondents felt that reasonable alternative had not been fully investigated, in particular respondents suggested that new development should take advantage of the new Bay Gateway with new development directed towards North Lancaster, Morecambe and Heysham areas;
 - The need for sustainable transport options and the potential to provide a rail link;
 - Pollution and flood risks associated with the River Conder, Ou Beck and Burrow Beck;
 - The importance of affordable, sustainable and well-designed housing; and
 - Concern over the impacts on both the natural and historic environment, in particular the impact on the rural character and landscape of the area, protected habitats and species and the loss of natural features such as trees, woodland and hedgerows.
- 7.22 In terms of response from the development industry, there was general support for the approach to allocating the Garden Village, however concerns over the implications on development viability and delivery arising from the infrastructure requirements for the Garden Village were raised on a number of occasions. Further details in the evidence can be found in the Council's Background

Paper 4: Delivering the Infrastructure Necessary for Growth. This document can be viewed on the council website or in the Document Library.

- 7.23 A number of additional sites have also been suggested through the consultation on the draft Local Plan in the Galgate area which, if allocated, would expand the reach of the Garden Village. For example a number of sites along Lancaster Road (A6) between the proposed Garden Village and Galgate. The largest submission made to the Council was for land to the West of Junction 33 (adjacent to the proposed Agri-Business Centre) which could generate up to 1,000 new homes. All submitted sites have now been submitted for their suitability for development through the Strategic Housing and Employment Land Availability Assessment (SHELAA) process and their outcomes reflected in the Publication Version of the Local Plan.
- 7.24 The Council received two petitions on Bailrigg Garden Village, objecting to the ‘scale, extent, impact, sustainability and long term disruption’. One petition contained 299 signatures and the other containing 67 signatures. In addition, the petitions suggested that they were not opposed to development and change in moderation but that the Council had not sufficiently considered alternatives, in particular land along the Bay Gateway. The petition also challenged the consultation timescales, the lack of impact assessments, the projected housing and employment figures and that the proposal will create an ‘urban village’ rather than a ‘garden village’.
- 7.25 All responses to the Bailrigg Garden Village proposal can be read in full (or in summary) on via the Council website, however, summarised below are a number of responses from key statutory stakeholders:
- *Highways England* have raised concern that the proposal has the potential to increase traffic movement on the M6 for local journeys, they also suggest that the reconfiguration of Junction 33 should include a park and ride and link to the rapid transport system.
 - *Historic England* have recommended that the plan be expanded to include greater reference to the historic environment in the consideration of allocating sites for development. There also needs to be an assessment of the site to underpin its allocation, in particular an assessment of the potential impacts on heritage assets in the vicinity. Where proposals are likely to have a harmful impact upon the significance of those assets the Plan needs to set out measures which mitigate that harm. If it is not possible to mitigate against that harm then further assessments are necessary against the tests set out in the National Planning Policy Framework.
 - *Lancashire County Council* highlight the potential increase in the number of journeys, both local and longer distance, generated by new proposed housing, the expansion of Lancaster University and the delivery of the Lancaster University Innovation Campus. To enable and support these schemes major improvements to transport infrastructure in South Lancaster will be required in line with proposals outlined in the Lancaster District Highways and Transport Masterplan.
 - *The Environment Agency* have highlighted that Burrow Beck is the main river in this site which has associated flood zones. They have recommended that development should include green infrastructure to support sustainable drainage and protect water quality.
 - *The Inland Waterways Association, Lancaster Canal Regeneration Partnership, Lancaster Canal Trust and Canal and Rivers Trust* have made similar comments. They note the recognition of no net loss as the Lancaster Canal is a key biological heritage site. They recommend a buffer zone between development and the canal, opportunities to improve the towpath and the potential for canal related enterprises and wish to be involved in the master planning process.
 - *Campaign to Protect Rural England (CPRE)* have suggested that the proposals would lead to Lancaster merging with Lancaster University Campus which will create ribbon development. They recognise that this is not in the Green Belt but open countryside and recommend that brownfield

land should be used elsewhere. They also emphasise the need for the Council to protect and enhance Park Coppice, Burrow Beck and Lancaster Canal, which are all key biological heritage sites.

- 7.26 The issues which are raised in paragraphs 7.21 & 7.25 are clearly wide ranging and relate to not only the general planning processes (which have been well described elsewhere in this statement) but are also site specific. The Council recognise that growth of the scale proposed will have significant implications and must be carefully planned with a wide range of opportunities for interested parties to input into the process.
- 7.27 Whilst the draft Local Plan initially included detail on the potential developable areas of the Garden Village and other matters such as areas of separation. It has become clear that these matters would be better dealt with via a specific development plan document rather than unnecessarily delaying other development opportunities outlined in the Local Plan. The Council have therefore concluded that whilst the principles of development (i.e. should the land be allocated for development) should be advanced via the identification of a broad location of growth in the Local Plan, the specifics of development delivery should come forward through the Bailrigg Garden Village Area Action Plan DPD.
- 7.28 The Area Action Plan DPD will seek to address all site specific issues identified in paragraph 7.21, with early consultation on a range of options taking place in the summer of 2018 and a preferred option document expected in late 2019.

North Lancaster Strategic Site

- 7.29 The allocation made at the North Lancaster Strategic Site, as identified in Policy SG9 of the Strategic Policies & Land Allocations DPD which includes land for the delivery of in the region of 700 new homes, a new business park and a new local centre with associated infrastructure and facilities.
- 7.30 In comparison to the Garden Village proposal, responses to the allocation of this site were limited. Responses that were received highlighted concerns about the proposed changes to the Green Belt as a result of the review and argue that the projected housing figures are flawed and do not provide for the exceptional circumstances required for a Green Belt release. It is suggested that the Green Belt provides a good separation between Lancaster and Halton and that the proposed separation is not sufficient.
- 7.31 A number of responses were received from residents of Slyne-with-Hest who suggested that development in this area should count toward the parish's contribution to wider housing needs and reduce the need for additional housing to be identified elsewhere in their parish. These were concerns from some residents that the site formally identified as GB4 in the 2015 People Homes and Jobs consultation would be again considered for development, even though this site was not identified in the draft Local Plan.
- 7.32 As with many sites consulted upon, issues relating to local infrastructure were raised as was the impacts on local landscape, natural and historic environment. There were requests that brownfield and empty properties should be prioritised over the release of Green Belt land.

7.33 All the responses to the proposals for Hammerton Hall/Beaumont Hall sites can be read in full (or in summary) on via the Council website, however, summarised below are a number of responses from key statutory stakeholders.

- *Historic England* have recommended that the plan be expanded to include greater reference to the historic environment in the consideration of allocating sites for development. There also needs to be an assessment of the site to underpin its allocation, in particular an assessment of the potential impacts on heritage assets in the vicinity. Where proposals are likely to have a harmful impact upon the significance of those assets the Plan needs to set out measures which mitigate that harm. If it is not possible to mitigate against that harm then further assessments are necessary against the tests set out in the National Planning Policy Framework.
- *Lancashire County Council* highlights the Development Consent Order (DCO) in relation to the construction of the Bay Gateway. The DCO relates to the need for landscaping and ecology works associated with the new road. The areas of land which require management including areas which are highlighted within the North Lancaster allocations. Whilst it is not envisaged to an impediment to development aspirations of the Local Plan careful consideration will need to be given to this issue as the plan progresses.
- *The Inland Waterways Association, Lancaster Canal Regeneration Partnership, Lancaster Canal Trust and Canal and Rivers Trust* have made similar comments. They note the recognition of no net loss as the Lancaster Canal is a key biological heritage site. They recommend a buffer zone between development and the canal, opportunities to improve the towpath and the potential for canal related enterprises and wish to be involved in the master-planning process.
- *Slyne with Hest Parish Council* suggest a possible change in parish boundary and recognise that the sensitive location of Beaumont Hall is supported.

7.34 Since consultation on the draft Local Plan, the Council have continued to seek engagement with key stakeholders to ensure that any outstanding concerns have been addressed by the Publication Stage. It should also be noted that the two original sites have now been merged together into one area (North Lancaster Strategic Site) which is dealt with under Policy SG9 of the Publication Version of the Strategic Policies & Land Allocations DPD.

East Lancaster Strategic Site

7.35 The allocation made at the East Lancaster Strategic Site, as identified in Policy SG7 of the draft Strategic Policies & Land Allocations DPD includes land for the delivery of in the region of 900 new homes, a new local centre and associated new infrastructure and facilities. The development of this area will require the re-modelling and re-positioning of Lansil Golf Course to allow road access onto Caton Road.

7.36 Again, in comparison to the Garden Village proposal, responses to the allocation of this site were limited. Access issues and the potential increase in traffic through the existing residential areas were one of the main concerns about the proposed allocation. In particular concern was raised over the potential for rat-running along Derwent Road, which is also the main access for schools and residential properties on Ullswater Road. It was suggested by members of the public that a new trunk road from Junction 34 to link Caton Road with Quernmore Road would help avoid traffic on existing rat runs. It was also suggested that there had been an increase in traffic since the opening of the Bay Gateway had opened, specifically increasing traffic to new residential developments at Nightingale Hall Farm, Lancaster Moor Hospital and the Leisure Park.

7.37 Developing the countryside and the impact on views and wildlife was raised. The use of planting, a small community woods or orchard was suggested to help buffer the sites from views (for example

limit any impacts on the setting of the Forest of Bowland AONB). Maintaining ancient woodland was also suggested as a way of mitigated against development.

7.38 All the responses to the proposals for the Cuckoo Farm/Ridge Farm site can be read in full (or in summary) on via the Council website, however, summarised below are a number of responses from key statutory stakeholders.

- *Lancashire County Council* have highlighted the Development Consent Order (DCO) for the Bay Gateway and that the proposals have implications for the landscape and ecology management plan. They also highlight the potential traffic implications and that an unintended city centre bypass could be created from Caton Road through the east of the city.
- *Historic England* have requested a heritage impact assessment of the site.
- *The Canal and River Trust* support a masterplan approach and highlight the location of the canal on the proposed development and the need to reference this along with waterside opportunities. They also welcome suggested improvements to this area and request that this is referenced elsewhere.
- *Campaign to Protect Rural England (CPRE)* have concerns about the loss of countryside and suggest that brownfield sites should be built in advance of this site, which should be phased for later in the plan period. If there is no alternative, open space and woodland should be retained. BHS must be protected and enhanced. The Local Plan must state that there should not be a future breach of the M6 corridor.
- *The Woodland Trust* highlight the Ancient Woodland and the need to protect this.
- *The Wildlife Trust for Lancashire, Manchester and North Merseyside* are pleased that the recommendations of the ecological appraisal have been taken on board. They highlight the need to integrate public access to, and the understanding and enjoyment of Long Bank Wood BHS, with continued protection and enhancement of wildlife features. Specific comments on other policies have also been made.

7.39 Since consultation on the draft Local Plan the Council have continued to seek engagement with key stakeholders to ensure that any outstanding concerns have been addressed by the Publication Stage.

Land at Lundsfield Quarry and the Land to the South of Windermere Road, South Carnforth

7.40 The allocations made at Lundsfield Quarry and land to the South of Windermere Road, as identified in Policies SG11 and SG12 of the Strategic Policies & Land Allocations DPD, will include and for the delivery in the region of 750 new homes, associated infrastructure and facilities. The development will include the regeneration of Lundsfield Quarry.

7.41 Again, in comparison to the Garden Village proposal, responses to the allocation of this site were limited. The consultation highlighted some support for the development of this area in order to effectively re-use a brownfield site and deliver much needed growth and opportunity for Carnforth. However, there is concern around the provision of new infrastructure, the loss of Green Belt and the impact on the natural environment. Some suggested that the Lundsfield Quarry, former TDG and Thomas Graveson sites should be a priority and developed before Green Belt. The opportunity to provide a mixture of houses and improve water quality of the River Keer were also raised.

7.42 The aggregates industry based in Carnforth have set out strong concerns about the new development proposals in the South of Carnforth in that it will constrain future quarrying use and may lead to increased complaints over their operations.

7.43 All responses to the Lundsfield Quarry/Windermere Road sites can be read in full (or in summary) on via the Council website, however, summarised below are a number of responses from key statutory stakeholders.

- *Aggregate Industries, Greater Manchester Minerals and Waste Planning and the Mineral Produce Association* highlight the need to safeguard the mineral reserves and resources of Back Lane quarry and the asphalt plant and concrete products factory. They also suggest that the access may cause problems for Back Lane being used for heavy goods vehicles which are essential for repair, maintenance and improvement of infrastructure eg M6 and that Kellet limestone resources are increasingly important. In addition, the *Mineral Product Association* state that Lundsfield Quarry require an environmental impact assessment.
- *Highways England* recognise the importance of Back Lane in relation to the quarry industry and highlight the necessity of improvements to the existing highway networks and the potential impact on safety and efficiency of Junction 35.
- *Lancashire County Council* highlight that this is an air quality management area and that the councils will work together in relation to the Lancaster Highways and Transport Masterplan, specifically on public realm and road improvements in Carnforth. The need to consider specific road issues is also highlighted.
- *The Canal and River Trust* have requested involvement in the development brief and master planning process and highlight a number of comments in relation to the canal location, improvements and maintenance.
- *The Environment Agency* have noted a record of historic landfill on site.
- *Natural England* highlight the need to consider the biodiversity and landscape impacts.
- *The Wildlife Trust for Lancashire, Manchester and North Merseyside* did not object to the proposed development of the land at Lundsfield Quarry. They were pleased that the Ecological Appraisal recommendations and made a number of comments in relation to this.
- *Home and Communities Agency* highlight that they are in the process of acquiring Lundsfield Quarry (via affordable Starter Homes programme) and welcome its allocation. They intend to work with council on this and suggest that the boundary should be extended, that the proposed open space is restrictive and support the principle of better connection to the town, although suggest that the master planning process will assess this.
- *Over Kellet Parish Council* and the *Campaign to Protect Rural England (CPRE)* are not convinced of the 'exceptional circumstances' to remove this from the Green Belt and suggest that it still meets the criteria.

7.44 Since consultation on the draft Local Plan the Council have continued to seek engagement with key stakeholders to ensure that any outstanding concerns have been addressed by the Publication stage.

Other Comment received on the Draft Strategic Policies & Land Allocations DPD

7.45 In addition to the strategic sites, the consultation asked for feedback on a wide range of smaller sites and policies in the Strategic Policies & Land Allocations Development Plan Document (DPD) and the Development Management DPD.

7.46 Detailed comments can be viewed in the '[Developing a Local Plan for Lancaster District Consultation Report June 2017: Appendix 2 – Summary Consultee Responses](#)'. This information has been presented by development plan document, policy number and site area although can also be searched by name and response.

Responses to the Development Management DPD

- 7.47 A number of comments were received on the draft Development Management DPD and the policies contained within it. Responses on this document tended to come from the development industry and planning consultants. Key issues are highlighted below but tended to focus on the issues of development viability and the impacts that policy requirements would have on the delivery of new homes to meet identified needs.
- Concern raised over the consistency of approach to development proposals in the Forest of Bowland AONB against those in the Arnsdale and Silverdale AONB which is having its own DPD prepared.
 - Concern over the affordable housing requirements set out in Policy DM3 which were not sufficiently evidenced.
 - Impacts on the delivery of new homes in relation to the housing standards highlighted in Policy DM2, the requirements for open space highlighted in Policy DM24, the need for high quality design highlighted in Policies DM26 and DM27.
 - Important that the Council's approach to planning obligations is resolved and a decision over the future role of the Community Infrastructure Levy (CIL) is addressed.
- 7.48 Detailed comments can be viewed in the '[Developing a Local Plan for Lancaster District' Consultation Report June 2017: Appendix 2 – Summary Consultee Responses](#)'. This information has been presented by development plan document, policy number and site area although can also be searched by name and response.

8. UPDATE – PUBLICATION & SUBMISSION OF THE LOCAL PLAN (REG. 19 & 22)

- 8.1 The following section sets out the Council's approach and compliance with the Regulations for publication of the Strategic Policies & Land Allocations DPD and the Development Management DPD. It sets out the bodies and persons invited to make representations and the mechanisms used for the publication of the Local Plan Submission Version.
- 8.2 Following the Full Council decision on the 20th December the Council published both the Strategic Policies & Land Allocations DPD and Development Management DPD on the 9th February for an eight week period for representations, concluding on Friday 6th April.
- 8.3 Unlike previous public engagement on the preparation of the Local Plan this represents the only 'formal' stage of engagement of the Local Plan under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 8.4 Unlike earlier stages of Local Plan engagement, which were consultations that helped to shape the content of the Local Plan, at publication the Council is satisfied that the Local Plan is complete and is seeking representations only.
- 8.5 Accordingly during this eight-week period interested parties and stakeholders were able to make representations on whether they feel the plan is sound and / or legally compliant. The representations made at the Publication stage defined the context and the discussion on the future independent Examination. The appointed Inspector is likely to invite parties to assist him or her to consider the legal compliance and soundness at local hearing sessions.

- 8.6 As Publication is a formal process the Council needed to ensure that a fair and consistent process had been followed. For example:
- Representations made must relate to matters of soundness and legal compliance;
 - Representations which do not address these issues would be considered as valid;
 - Representations must be made within the eight week period (the statutory requirement for a Publication Period is a minimum of six weeks); and
 - Representations could not be anonymous.
- 8.7 To aid the Publication process, the Council produced and published a standard representation form, guidance on how representations could be completed and a frequently asked questions paper in order to guide interested parties in making representations on the plan.
- 8.8 Prior to the Publication period commencing, the Council notified interested parties of the opportunity to make representations, these notification methods included:
- Publication on the Council's website of the relevant documentation, evidence, background papers, representation forms and accompanying guidance;
 - Making hard copies of documents available at both Lancaster and Morecambe Town Halls;
 - Sending out emails to the Local Plan consultation database informing of the commencement of the Publication period;
 - Paid advert in the Lancaster Guardian;
 - Press release to the local newspapers and local media outlets; and
 - Updates on social media.

Summary of Response Received

- 8.9 The Publication period attracted responses from **172** different individuals or organisation which, when broken down generated **568** representations on different aspects of both the Strategic Policies & Land Allocations DPD and Development Management DPD.
- 8.10 An interim summary report of the representations received has been produced and is available on the council website.
- 8.11 The representations received raised a number of issues which are likely to require further discussion and debate during the course of Public Examination, some of the key issues are highlighted below.

Bailrigg Garden Village

- 8.12 The main response from local residents came towards the proposals for Bailrigg Garden Village. There remains strong opposition to the development of a Garden Village from residents of Galgate and South Lancaster and the representations received on this matter covered a range of issues which led to recommendations that the proposal for a Garden Village should be removed from the Local Plan. These issues included:
- That the proposed Garden Village did not meet the Government definitions of what a Garden Village, particularly that it should be self-contained and locally led;
 - The impacts of new development on local flood risk;
 - The scale of development proposed which is considered to be unnecessary;
 - The high costs of the infrastructure needed for development, which is considered to render development unviable;

- The impacts on existing infrastructure;
- The impacts of increasing vehicle movements, both in terms of local congestion and impacts on air quality; and
- The loss of greenfield land, landscape impact and loss of wildlife and habitats.

- 8.13 Many responders felt that development was unnecessary, citing over estimated assumptions over housing need, future growth in housing demand and opportunities for economic growth.
- 8.14 A consistent response was the concern over the lack of information currently available for the Bailrigg Garden Village proposal and that people were not clear on what new development in this location involved. Many felt that it was premature to be asked whether the proposal was sound or legally compliant based on the lack of information available.
- 8.15 Conversely, there was general support from the development industry and other statutory stakeholders to the identification of the Garden Village as it would establish certainty over where long term housing growth should be located.
- 8.16 All parties recognise that only the broad principles of development of the Garden Village can be addressed through the Strategic Policies and Land Allocations DPD, with the subsequent detailed work being part of a specific Area Action Plan DPD which was discussed in more detail at this meeting and the previous Meeting of this group. All parties highlighted their willingness to engage in this process moving forward.

Overall Housing Requirements

- 8.17 The scale of the overall housing requirements set out in the Strategic Policies and Land Allocations DPD resulted in a wide range of representations. The development industry is often of the view that the Local Plan does not do enough to identify sufficient opportunities for housing growth to meet the evidenced needs set out in both the 2015 Independent Housing Requirements Study and the 2018 OAN Verification Report as prepared by Turley.
- 8.18 Representations from the development industry highlight the plan's failure to meet these evidenced needs and do not agree that the local circumstances identified in the plan which the Council's believes are a challenge to its ability to meet these needs (i.e. the environmental constraints and infrastructure requirements) such that a lower housing requirement figure is proposed.
- 8.19 It is the view of the development industry that the plan should allocate more land for development, including investigating the release of other strategic sites, smaller rural sites, greater growth in neighbourhood plan areas or further releases of land within the North Lancashire Green Belt.
- 8.20 It was the view of some in the development industry that it should be for Lancaster district to meet the housing shortfall of neighbouring Wyre through the allocation of further land in the Galgate area to meet housing needs.
- 8.21 Conversely, many local residents (in connection with Bailrigg Garden Village) consider the housing requirements set out in the plan to be overly ambitious and not realistic. Many suggest that the Council should seek to lower the housing requirements to reflect the emerging requirements from the new NPPF which was published in July 2018 following the submission of the Local Plan.

Reliance on Large Strategic Sites

- 8.22 Development industry representative's point out the Plan's reliance on the delivery of large strategic greenfield sites means that meeting the development needs of the district is heavily reliant on a small number of sites, some of which require significant investment in new infrastructure.
- 8.23 It is the view of the many development industry representatives that the Local Plan should also identify more small sites to meet the housing backlog in the early stages of the plan. A number of developers suggested additional sites for inclusion in the Plan.

Evidence to Underpin the Local Plan

- 8.24 A number of residents and the development industry are of the view that the Local Plan is deficient in some aspects of its evidence base: in their view this includes; traffic assessments, air quality assessments, flood risk and development viability.

Opportunities for Economic Growth

- 8.25 A number of residents consider that the economic growth opportunity for the district is over estimated and will not occur. There was scepticism raised about the level of job growth associated with the Lancaster University Health Innovation Campus, the University, and the Heysham Gateway. This argument is made in parallel with concerns about housing allocations.

The Deliverability and Viability of Development

- 8.26 A key concern for the development industry is the requirement placed on new development, including physical infrastructure, high quality design, open space requirements and the application of national standards for housing.
- 8.27 Developers often state that there is limited evidence on viability, and accordingly the local plan should provide flexibility on requests for contributions from development. Importantly, representations are clear that a full picture on development viability should be available in good time to inform the Public Examination.

Infrastructure Delivery

- 8.28 Residents and developers are keen to ensure that the correct infrastructure is delivered through new development. Residents question how infrastructure will be delivered, who would fund it, when it would be built and offered a general scepticism over whether the right levels of infrastructure would actually be provided to meet future demands.
- 8.29 The development industry wished to see the sufficient infrastructure delivered in a way which does not overburden their proposals. For some the level of information provided by the Council's Infrastructure Delivery Plan (IDP) is not sufficient, particularly in relation to the project costs of new infrastructure.

Submission of the Lancaster District Local Plan – 15 May 2018

- 8.30 In accordance with regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (As Amended) Lancaster City Council submitted the Strategic Policies and Land Allocation Development Plan Document (DPD) and the Development Management DPD to the Secretary of State (Planning Inspectorate) on 15 May 2018 for Public Examination.

9. UPDATE – CONSULTATION ON ADDITIONAL EVIDENCE

9.1 Following the submission of the Local Plan, the Council published additional evidence and information to support the submitted Local Plan, this included the following elements of evidence:

- Transport Assessment – Stages 1 and 2 (White Young Green 2018)
- Local Plan Viability Assessment - Stages 1 and 2 (Lambert Smith Hampton 2018)
- Lancaster District Open Space Study (Knight, Kavanagh & Page 2018)
- Lancaster District Playing Pitch and Outdoor Sports Strategy (Knight, Kavanagh & Page 2019)
- Landscape, Townscape and Visual Field Summary Report (Arcadis 2018)
- Key Urban Landscape Review (Arcadis 2018)
- Urban Setting Landscape Designations Assessment (Galpin Landscape Architecture 2018)
- Level 2 Strategic Flood Risk Assessment (SFRA) (JBA 2018)
- Air Quality Position Statement (Air Quality Consultants 2018)
- Housing Land Monitoring Report (Lancaster City Council 2018)
- Housing Standards Paper June (Lancaster City Council 2018)
- Lancaster District Inclusive Growth Report (Hall Aitken 2018)
- Strategic Housing and Employment Land Availability Assessment Report (Lancaster City Council 2018)

9.2 As agreed with the Planning Inspector, a six-week consultation took place between Friday 4th January until 5pm on Friday 15th February 2019 inviting representation on the soundness of the plan, its legal compliance and conformity with the duty to co-operate requirements in light of the additional evidence published. This consultation was conducted in accordance with the requirements of Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

9.3 Prior to the consultation period commencing, the Council notified interested parties of the opportunity to make representations, these notification methods included:

- Publication on the Council's website of the relevant documentation, evidence, background papers, representation forms and accompanying guidance;
- Making hard copies of documents available at both Lancaster and Morecambe Town Halls;
- Sending out emails to the Local Plan consultation database informing of the commencement of the Publication period;
- Paid advert in the Lancaster Guardian;
- Press release to the local newspapers and local media outlets; and
- Updates on social media.

Summary of Representations Received

9.4 The consultation on the additional evidence attracted responses from **74** different individuals or organisations. Of that total **47** were individuals / organisations that has previously made representations and the Publication Stage and **27** were from individuals / organisations that has not previously made representations into the Local Plan.

9.5 The Council have sought to update the summary report of representations which was prepared for the Publication Stage, highlighting the additional representations received at this stage in **light green** for clarity. However, due to the prompt requirement of the Inspector to publish the outcomes of this consultation immediately after the end of the consultation period, any representations received in the closing hours of the consultation period have not been summarised. Those representations

which have not been summarised have still been identified, however it is made clear that these representations must be read in full. It is important to note that whilst these representations have not been summarised in the Summary Report, the Council have read through these representations and highlighted the key issues raised within this Consultation Statement. All representations received have been forwarded to the Inspector for his consultation.

- 9.6 The representations received as part of this consultation have raised the following issues, which are in addition to those already described in paragraphs 8.9 to 8.29 of this Consultation Statement. These are likely to require further discussion and debate during the course of the Public Examination. These key issues are highlighted below.

General Comments on the Consultation Process

- 9.7 A number of representations have been received, predominantly from local residents, over the complicated nature of the consultation, the status of this consultation and previous consultation (particularly the suggested modifications published in October 2018) and the scale of additional evidence being consulted on. It was the view of a number of parties that the process was overly confusing and over burdensome on local people to understand detailed reports. The consequence being that individual were unable to response or were simply becoming dis-engaged from the process.
- 9.8 A key theme from a number of representations was the timing of the consultation, with reference made to national planning guidance that all relevant evidence should accompany the plan at the point of Submission and not be prepared and produced after the event. Concern has been raised that the evidence, its findings and its outcomes have not properly informed the preparation of the Local Plan documents in the way that the NPPF intends them to.

Housing Evidence

- 9.9 Representations have been received from a number of local residents who continue to suggest that the plans aspirations for housing growth remain unrealistic and overly ambitious. None of the evidence presented as part of this consultation demonstrates their original concerns have been addressed.
- 9.10 Conversely, representations from the development industry have suggested that the Council have failed to allocate a sufficient level of land to demonstrate a sufficient 5 year supply in the context of the 522 dwellings per annum requirement set out in the Submission Version of the Plan.
- 9.11 Representations from site promoters within South Lancaster area of growth have suggested in light of the failure of the Council to achieve OAN requirement, that their sites should be allowed to come forward in advance of any form of master planning for the wider area, which is being prepared through the Lancaster South Area Action Plan. It is suggested that due to the low levels of delivery site which can come forward in the short term should not be deliberately held back by the Council. The responses suggest that the additional evidence prepared by the Council, in particular the transport assessment, support the early delivery of development in this locality.

Transport Assessment – Stages 1 & 2 (White Young Green)

- 9.12 Representations have been made from a number of parties from the development industry, local communities suggesting that it is not plausible that the transport assessment can have been taken into account in the site allocations process.

- 9.13 It has also be noted by such parties, and Highways England, that the assessment does not include a Strategic Transport Model and therefore is not capable of modelling transport impact of district-wide development. Concern is also raised that the assessment tests ‘worst-case scenarios’ only. A number of parties sees the lack of such a model as a fundamental evidence gap.
- 9.14 In counter to such concerns, representations have been received from Lancashire County Council, the relevant local highway authority for the district, it sets out a detailed response to its views on the transport assessment work concluding that the modelling prepared by WYG is considered to be a proportionate analysis and adequate for the initial period of the Local Plan whilst strategic model and major schemes are developed. Their response also sets out a range of support for transport policies and allocations in the Local Plan and also sets out the ongoing work in the district in terms of transport matters.
- 9.15 Lancashire County Council’s representation sets out their position in relation to the absence of a Strategic Transport Model, which is highlighted as a key concern by some parties (as outlined in paragraph 9.12 and 9.13 above). Due to the significant costs and resource involved in developing such models, the County Council would not ordinarily expect a strategic transport model to accompany a local plan and where such a model would be used solely for Local Plan purposes the cost to be borne as part of the plan making exercise from the Local Planning Authority.
- 9.16 Supplementary representations have been received from Minerals operators in relation to development proposals in South Carnforth. Concern has been raised that the transport assessment does not sufficiently take into account the current level of HGV movements which occur along Back Lane and Kellet Road nor does it take into account the potential for further vehicle movement should the quarries in the locality return to full capacity.
- 9.17 With regard to the Stage 2 assessment, concern has been raised by a number of parties over the costs which have been included which do not appear to have been factored into any assessment of viability.

Local Plan Viability Assessment – Stages 1 & 2 (Lambert Smith Hampton)

- 9.18 With regard to the viability assessments prepared by Lambert Smith Hampton, representations from the development industry raise concern over a number of assumptions used in the assessment in relation to land values, abnormal costs, infrastructure costs. There is concern that such assumptions are likely to make development unviable.
- 9.19 Representations have been received from local residents which raise concern over the potential funding sources for new infrastructure in the absence of a successful HIF bid, these representation place scepticism on whether such a bid will be successful and, should this be the case, question the soundness of the plan.
- 9.20 Gladman Developments have put forward a specific reference to the use of housing standards and their potential impact on viability. It is there view that late preparation of this evidence means that the policies in the Plan, particularly DM2, is not sufficiently supported with robust evidence. It is their view that the role of such standards will have an impact on development viability and that there is insufficient local evidence to justify their inclusion.

- 9.21 A number of representations from the development industry raised concern over the Council's expectations for affordable housing, these concerns were focused on a wide range of development, from brownfield to greenfield location and in relation to both strategic and small-scale sites.

Open Space, Playing Pitch and Outdoor Sports Assessments and Strategies

- 9.22 Representation have been received from Sport England which support the preparation of both the Open Space Study and the Playing Pitch & Outdoor Sport Assessment. However, they have raised concerns over the soundness of the plan due to the absence of a built facility strategy.
- 9.23 Representations have been received from two sports groups in relation to the assessments, Westgate Cricket Club supporting the outcomes of the Playing Pitch Assessments and the need to support the continued use of land for cricket pitch provision. A separate representation has been received from the Vale of Lune Rugby Union Club which, whilst giving outline support to the direction of the assessment, outline their concerns that their future ambitions to deliver new 3G facilities on their site may not be achieved by the direction of the assessment.

Landscape Assessments

- 9.24 Representations from the promoters of strategic sites raised significant concerns over the landscape assessments prepared by the Council, these concerns related to the methodology used in the assessment, the outcome and findings of the assessment and ultimately the potential implications to delivery of their sites. This is particularly the case with representations made for developers in South Lancaster, East Lancaster and North Lancaster.
- 9.25 In the context of proposed changes to the Green Belt in the Torrisholme / Bare area (as discussed in paragraph 9.33 of this Statement). The use of evidence to demonstrate the landscape value of this area was highlighted as a reason for the land to remain in the Green Belt with further landscape protected add to the area.

Representations Made on other elements of Additional Evidence

- 9.26 Supplementary representations have been received from Natural England in relation to the Helipad Roost Site in Heysham and its designation in the Local Plan. Concern has been raised over the potential inconsistencies between the Local Plan's intention to allocate this area within Policy SG14 of the Strategic Policies & Land Allocations DPD and the outcomes of the HRA process which has been prepared on the basis that this land will be excluded from the designation.
- 9.27 On the basis of this inconsistency Natural England object to the plan although they confirm that this concern can be resolved with clarification in the Local Plan that this area will be excluded from any form of development allocation. It should be noted that to counter the points made by Natural England that Peel Ports, owners of this land, have put forward representations which support the retention of this land within the employment allocation and that as it forms part of the Port Estate that permitted development rights apply.
- 9.28 Lancashire Wildlife Trust submitted representation which raised disappointment at the lack of evidence on biodiversity to support the allocations for employment made as part of the Heysham Gateway. It is their view that the allocation is not support in the context of need for development, how drainage will be dealt with and how impacts on the natural environment will be addressed.

- 9.29 Representations have been made by CLOUD residents group that suggest that the outcomes of the Inclusive Economic Growth Report contradict the direction of the Plan in terms of the job growth it proposes, particularly in relation to job creation at the Innovation Campus and University. It is their view that the evidence on job growth has not been positively prepared.
- 9.30 Furthermore CLOUD have made representations to suggest that the evidence in relation to flood risk matters is not deficient as it makes no reference to land connected to the Garden Village or the land which was effected by the flood events in November 2017. CLOUD also raise objection to the lack of a full Air Quality Assessment to accompany the Plan.
- 9.31 A number of representations were received in relation to the Council's Strategic Housing and Employment Land Availability Assessment (SHELAA). Representations made clear that there were a number of small sites in the assessment which had not been formally identified in the Plan and it was requested that greater consistency was provided in terms of the outcome of the assessment and the allocations within the Plan.

Any other Matters Raised

- 9.32 A number of further (and supplementary) representations were received from local residents in connection with the proposed development of Bailrigg Garden Village in South Lancaster. The representations highlighted that in terms of the additional evidence consulted on that this did not address the issues of soundness and legal compliance that have been previously raised in relation to this element of the Local Plan.
- 9.33 Representations have also been received from local residents and Morecambe Town Council in relation to the proposed change to the Green Belt boundaries on land to the rear of Fulwood Drive in Torrisholme. Concern has been raised that the Green Belt designation should be retained in this area and that the Council's reason for the change is not justified and would lead to increased vulnerability to inappropriate development in this area. Whilst it is noted that the Local Plan does not seek to allocate the area for development, representations suggest that the local landscape designation proposed does not provide sufficient protection for the area and that the Green Belt designation should be retained.
- 9.34 Representations have been received suggesting that further land should be identified as being deliverable for development in the Strategic Housing and Employment Land Availability Assessment (SHELAA) and therefore allocated for development, this include land at the VVV Gymnasium in Slyne-with-Hest and land to the North of Kellet Road, Carnforth.
- 9.35 Wyre and Craven Councils put forward representations stating that they have no further comments on the Plan.

Submission of Representations to the Inspector

- 9.36 Following the conclusion of consultation on the additional evidence the Council submitted all representations received, along with an updated Regulation 22(c) Consultation Statement (this document) to the appointed Inspector for his consideration as he prepared his issues and matters for the forthcoming Public Examination.

10. APPENDICES

APPENDIX A: PUBLICITY METHODS

Methods	Main consideration
Documents made available for inspection	This is a minimum requirement as set out in the Regulations. Relevant documents will be made available for inspection during consultation period at the Council's offices in the Lancaster and Morecambe Town Hall and libraries in the Lancaster District. Public access to these documents is available via PCs in the reception areas
Website	Each consultation stage will feature prominently on the homepage of the council's consultation ¹ and planning policy webpages. This will link directly to information on document production, providing access to the consultation material and advice on how and when comments can be made. Articles providing updates on plan production, which may include consultation and engagement opportunities, may be published in the Council's online news section periodically but it will not be solely relied upon as a means of communication.
Adverts/public notices	Notices will be placed in a local newspaper advertising consultation and engagement opportunities, where appropriate. Statutory requirements to publish notices advertising certain planning applications
Mailing List – Email / Letter	The Council operates a database of individuals and organisations that have expressed an interest in the plan-making process, have previously been actively involved in policy development or are statutory consultees. Those who wish to be involved will be directly notified at each stage either through email or letter of opportunities to comment. Those who are interested in planning policy development and wish to be notified can be included on the Council's mailing list at any time ²
Press release	To be undertaken in accordance with the Council's media team, Media briefings/press releases will be issued to local media. Although items may only be reported if they are considered newsworthy by the newspaper editors, therefore publication is not guaranteed.
Parish and Town Council and Community Group publications	These types of publications are distributed to local residents at least quarterly. The Council will work with relevant organisations to utilise these publications to notify residents of consultation and engagement opportunities, where possible. Consideration will need to be given to the timing of the consultation, and the timing and circulation of any publications outside the Council's control.
Posters	Posters may be sent to relevant Parish and Town Councils and libraries to be displayed on notice boards to raise awareness of any public consultation and engagement opportunities. Posters may also be displayed in other appropriate locations across the District.
Leaflets	Leaflets may be used to gain wider public awareness of a consultation or engagement opportunity, for example leaflets may be distributed at key attractors/destinations such as train stations and local schools.
Social Media	Media such as Twitter and Facebook will be used to highlight public consultations on planning policy documents with direct links to the Council's website and information on how to comment, and any engagement events.

¹ www.lancaster.gov.uk/consultation

² www.lancaster.gov.uk/ppc

Methods	Main consideration
	Such messages may be retweeted periodically throughout the consultation period ³ . However, comments will not be accepted via social media.
Events	Such events may include drop-in sessions, public exhibitions and/or targeted workshops. Parish and Town Council meetings will be utilised where possible. The type of event undertaken will be dependent on a number of factors, including the consultation stage, and time and resource constraints. Careful consideration will be given to the timing, venue and format of events to ensure accessibility and inclusivity.
Key stakeholder Groups	We will liaise with key stakeholder groups at key stages in the plan making process, to discuss issues and keep them informed of progress.
Questionnaires / surveys	Questionnaires / surveys may be used to focus comments and to help ensure that feedback relates to issues that are within the scope of the document being consulted upon.
Newsletters	The Council sends 'Your District Matters' News to all households three times a year. In addition, a Local Plan newsletter is produced as appropriate. We will use these to update the community on progress in preparing the Local Plan and opportunities to get involved.
Meetings with Communities / organisations	We will arrange meetings with local communities where proposals may have a significant local effect. We will respond positively to requests for other meetings, where time and resources allow. The media, posters and leaflets may be used to advertise public meetings.

APPENDIX B: EARLY ENGAGEMENT PRE-2013

It is important that this Consultation Statement is read in conjunction with the Duty to Co-operate Statement of Compliance which sets out the Council's approach to engaging with neighbouring authorities.

All document can be viewed on the council website or in the Document Library

Key dates and stages are described in [Appendix D](#).

Combined Scoping Exercise (25 June to the 6 August 2010)
<p>In the summer of 2010 the Council's Planning and Housing Policy Team prepared a Scoping Document which formed the basis of a consultation exercise to assess the scope and content of what the Strategic Policies & Land Allocations DPD should include, considering issues such as:</p> <ul style="list-style-type: none"> • The purposes and objectives of the DPD; • The geographical areas which the DPD should cover; • The timeframe which the DPD will be in place for; • Matters to be addressed by the DPD; and • Matters not to be addressed by the DPD. <p>This was supported by a new Sustainability Appraisal Scoping Report for the district, prepared on behalf of the Council by independent consultants Arcadis (formerly Hyder). The Scoping Report explored the preparation of a new Sustainability Appraisal framework for the district. This was</p>

³ [twitter@lancastercc](https://twitter.com/lancastercc)

Combined Scoping Exercise (25 June to the 6 August 2010)

explored via dialogue with the 3 SEA bodies of Natural England, the Environment Agency and Historic England.

The consultation exercise asked members of the public and other key stakeholders a series of questions through the Scoping Document to establish whether any key issues has been missed in what the documents should be addressing and provided an opportunity for amendments to be suggested. Consultation at this stage helped set a structure and provide a basis to what issues should be addressed within future drafts of each document, particularly in relation to the points raised above.

The Scoping Exercise involved a series of drop-in sessions across the District, these sessions allowed for members of the public and interested parties to meet with officers in the Planning and Housing Policy Team to discuss the implications of the emerging DPD and provide comment on the issues that they felt should be included within the documents. The drop-in sessions used locations in Lancaster, Morecambe, Carnforth and Hornby.

Alongside the public events, letters were issued to members of planning policy consultation database (which consists of approximately 900 people) and advertisements published in the local press – advertising that the Council were consulting on this issue and inviting comments on the Scoping Document and the process as a whole. To ensure that stakeholders were involved, face-to-face meetingsⁱ were established to ensure that the views of key groups and organisations were secured.

The consultation period lasted for 6 weeks, between 25th June to the 6th August 2010 and raised between 56 responses.

Following the conclusion of the consultation events all comments and responses received were analysed and their implications to the council's approach to the DPD production considered:

Main issues raised:

- To ensure that the documents appropriately addressed the needs of rural communities, both in terms of the development needs but also the protection of the countryside;
- The document should assist in the delivery of key pieces of infrastructure, particularly in relation to the need for improvement to the existing highway network;
- The protection of environmental capital should be at the heart of the documents, in terms of protection and enhancement;
- Encouragement to be given to the protection and sustainable growth of the key economic drivers in the district;
- That the draft objectives suggested were broadly supported subject to some minor amendments;
- That the use and generation of energy should be tackled at a local level and can influence the impacts of Climate Change.

The issues that were raised through the Scoping Consultation were considered in the context of their implications to the preparation of the Land Allocations. The issues raised in the Combined Scoping Exercise were grouped together into key themes, such as Climate Change, renewable energy, transport and housing which officers recognised would need further discussion at later stages of the preparation process.

Timetable:

Preparation of the Scoping Document	April – June 2010
6 week consultation on the Scope of the Development Plan Documents	25 June – 6 August 2010

Combined Scoping Exercise (25 June to the 6 August 2010)

Analysing the Consultation Responses	Aug – Sept 2010
Preparation of Consultation Report	September 2010
Presenting and Publishing the Report	October 2010

Draft DPD Objectives (October 2010)

A series of draft DPD objectives were published within the Combined Scoping Document. However, these were prepared as a basic draft to aid initial discussion on the preparation of the DPD:

- Makes a positive contribution in which it is located, the economy and the wider environment;
- Avoid significant harm to the local neighbourhood, the environment or the local economy;
- Function efficiently and effectively and manage environmental and other risks; and
- Is deliverable within an identified timescale.

The draft objectives underwent their first refinement through discussions at an officer's workshop in October 2010 which allowed officers from various council departments and services to discuss how the objectives could be improved and how they could be amended to assist other local strategies and action plans.

Once discussed and agreed at officer level within the Council the objectives were then also discussed within the thematic workshops, allowing for further refinement before a final version of the draft objectives were sent to the Sustainability Appraisal Panel for assessment via an SA workshop on the 8th February 2011.

The final input in to the preparation of the DPD objectives came through the through the Sustainability Appraisal Panel, which considered the objectives in relation to their social, economic and environmental impacts. It was concluded that following all discussion that the objectives, as drafted below, had due regard to all sustainability implications and were ready for public consultation through the 'Developing the Options' Papers.

The final draft objectives for the DPD included:

- That development makes an overall positive contribution to the delivery of sustainable communities, the economy and the environment.
- That development contributes to the need of local communities and the delivery of sustainable development; and
- That development delivers development that is well designed, sympathetic to the natural and built environment and is planned and constructed in a sustainable manner.

A report on the responses to the Combined Scoping Stage, and the Council's response to them, was prepared and published in late 2010. The finalised report was presented to Council Members at Planning Policy Cabinet Liaison Group in October 2010 and subsequently published on the Council's website.

Timetable:

Draft Objectives produced for the Scoping Exercise	June 2010
Objective refined through Officer Discussion	October 2010
Objective refined through Thematic Groups	October – November 2010
Draft set of Objectives Appraised through Sustainability Group	December 2010

Draft DPD Objectives (October 2010)

Final Objectives set in place

January 2011

Rural Communities (2010 – 2011)

The Council felt that the issues for the urban areas of Morecambe, Lancaster and Carnforth are well understood. However, the issues that affect rural communities in the District are more diverse and more challenging for the development plan system to address.

Consequently, specific consultation was arranged with rural communities to establish what challenges face them both now and into the future and how the future development plan can help in revitalising rural areas. Issues that the rural engagement exercise sought to address included:

- Housing in Rural Areas;
- Local Services;
- Transport and Connectivity;
- Natural Environment; and
- Tourism and the Visitor Economy.

In order to obtain this information the council published a series of questionnaires which were sent out to all Parish Council's in the District, the opportunity was also offered for officers of the Planning Policy team to attend Parish Council meetings to discuss the potential implications of the Land Allocation DPD.

Following this invitation, a series of meetings were set up with the eight named villages in Lancaster District's adopted Core Strategy which include Silverdale, Hornby, Slyne-with-Hest, Caton & Brookhouse, Wray, Bolton-le-Sands, Halton and Galgate. The council sought to engage with local communities in these villages through meetings with Parish Councils and local residents groups.

As part of this strand of consultation all other villages in the District were also contacted via email or letter to request their views on the topic areas above, and any other issues that they felt had not been raised but required further addressing through the development plan process. An opportunity was also offered to these smaller villages of further assistance, such as one-to-one meetings where staff resources allowed. On many occasions this offer was not taken up by Parish Council's.

Consultation with rural communities took place between November and December 2010, the outcomes and findings of the engagement was collated and presented to Council Members at Planning Policy Cabinet Liaison Group in March 2011.

Timetable:

Preparation of the Rural Engagement Consultation	September 2010
Rural Engagement Consultation	Oct – Nov 2010
Rural Engagement Events	November 2010
Preparation of a Report on the Consultation Exercise	December 2010
Publishing and Presenting the Report	March 2011

Spatial Planning Exercises (2011)

The final strand of the informal 'Issues' consultation, from February to March 2011, involved the preparation of a Spatial Planning Exercise which focused on the specific 'land' use issues that are involved in the preparation of a Land Allocations DPD.

To best achieve engagement on the spatial element of the DPD preparation, the planning required participants to debate how they would meet the development needs of the district through the development plan period.

To assist discussion, information was provided to assist participants in the exercise make decisions on where development should be directed. Information included the potential suitable sites that had been identified through the previous evidence base process (including sites submitted in the SHLAA process, 'Call for Sites' process or sites that have been submitted to the Planning Service registering an interest for future development. Other information includes data on potential constraints and other key information on settlements extracted from Lancaster's Spatial Atlas.

Using the information provided, and acknowledging a series of 'givens' (such as the housing requirement set out in the adopted Core Strategy, National Planning Guidance and other over-arching policies that are relevant) the Council asked participants the question – how and where should the district's development needs be met.

The exercise involved a map which identified potential development, areas of constraint and other pieces of key information. It was then down to the participants to identify suitable locations to meet future development needs. The discussion generated related specifically to the provision of new housing to meet future needs. In relation to this the participants were given a selection of coloured counters of differing numerical denominations which represent the 'housing supply'. Participants were asked to place the counters on sites where it was felt that development would be most appropriate.

Participants to the exercise included key stakeholders and Council Members, but also an open consultation which allowed Members of the Public across the district to participate in the exercise. Whilst the event was publicised as an opportunity for all to participate numbers had to be limited to allow for sufficient staffing resources to run the workshop groups.

As with the previous two strands of issues consultation, a report was prepared setting out the findings of the exercises and the implications for the preparation of the Land Allocations DPD. This was collated and presented to Council Members at Planning Policy Cabinet Liaison Group in March 2011.

Timetable:

Preparation of the Spatial Planning Exercise	Nov 2010 – Jan 2011
Advertisement of the Consultation Events	January 2011

'Developing the Options' Consultation (2011)

For the final part of the informal consultation stage of the development plan process (formerly under Regulation 25 of the 2004 Planning and Compulsory Purchase Act, now Regulation 18) the council undertook further consultation on 'Developing the Options' topic papers. This took place from July to September 2011.

‘Developing the Options’ Consultation (2011)

In relation to the Land Allocation DPD, the aims of the ‘Developing the Options Consultation was the following:

- Options of the Policy Areas Suggested;
- Opinion on whether other policy areas should be included; and
- Opinions on the council’s position on the suggested policy areas.

Consultation took place on these topic papers commenced on Monday 11th July 2011 for a 10 week period ending on Friday 16th September 2011. During the consultation period, a series of consultation events were arranged which involved exhibitions and an opportunity to meet with officers of the Council to discuss emerging policy or potential allocations and their potential implications within the local area.

To supplement the public exhibitions described above a series of specific events were arranged to target the views and opinions of particular sections of the community.

In line with the Council’s Consultation Plan and Statement of Community Involvement (SCI) a variety of consultation methods were used including the exhibitions and events described above, these included:

- A general mail out to members of the local plan database, this included a total of 763 emails and 96 letters sent to contacts who have an interest in planning issues, this included members of the public as well as wider stakeholders and interest groups.
- An interactive version of both ‘Developing the Options’ document was made available on the Council’s planning policy website. This allowed comments to be submitted directly on-line using this interactive link.
- Press releases were sent to local papers and articles were published in the ‘Business Matters’ Chamber of Commerce magazine in July 2011 and on the Virtual Lancaster website. An article on the consultation was also published in the Lancaster Guardian on the 11th August 2011.
- Information on the consultation was announced on ‘The Bay’ radio with information also available on their website.
- A half page article advertising the consultation was provided in the summer edition of the Council’s publications of ‘Your District Matters’ newsletter. This is sent to every household in the district and as such provides an effective method of providing information on the consultation to local residents.
- In addition to the general mail out the council continued to seek engagements through its Facebook group. This was established to provide a sounding board for people to express their views on future planning policy.
- Updates on the consultation were regularly posted on the council’s twitter account providing the public with quick updates on the work of the team.

Timetable:

Preparation of the ‘Developing the Options’ Papers	May – July 2011
Preparation of a Consultation Report	September – October 2011
Consultation Report Presented to PPCLG	October 2011

Draft Preferred Options' Consultation 22 October 2012 to 14 December 2012

The 'Draft Preferred Options' stage provided the opportunity to comment on the first full draft of the Land Allocations DPD. This was the first stage of plan preparation where detailed guidance had been set out by the Council in terms of policy content and policy approaches to a variety of particular planning issues. This section sets out the Council's approach to this major stage of consultation which has been one of the key stages in the preparation of the Land Allocations DPD.

Preparation of the Land Allocation DPD began in late 2011 following the conclusion of the 'Developing the Options' consultation. The preparation of the DPD has required significant internal consultation with officers in the Council and with external stakeholders such as Lancashire County Council, the Environment Agency, United Utilities, Natural England and English Heritage. The preparation of the Land Allocation DPD has also undergone significant appraisal work whose recommendations have consequently gone into refining the DPD.

Consultation on the 'Draft Preferred Option' Land Allocations DPD commenced on the 22nd October 2012 and concluded on the 14th December 2012. During the consultation period a series of consultation event were arranged, involving exhibitions and provided the opportunity for interested parties and individuals to meet with officers of the Council and discuss the content of the documents and the implications on their local area.

Timetable:

Preparation of the Draft Preferred Option Documents	Dec 2011 – June 2012
Internal Consultation with Council Officers	Feb – May 2012
HIA and EqIA on Draft Preferred Option Documents	May 2012
SA on the Draft Preferred Options Documents	April – May 2012
Draft Documents presented to PPCLG	29 th May 2012
Council Member Briefings	July 2012
Draft Documents presented to Cabinet	3 rd July 2012
Draft Document presented to Full Council	12 th September 2012
Consultation on the Draft Preferred Options Documents – see below	October – December 2012
Preparation of a Consultation Report	January 2013
Consultation Report presented to PPCLG	March 2013

As with previous informal consultation period the consultation process was prepared with the Council's own Consultation Plan and Statement of Community Involvement (SCI) in mind. This involved the use of a variety of differing consultation methods, including the preparation of a consultation leaflet and a series of exhibitions and consultation events. The details of this stage of consultation is set out below:

- The Council prepared and published a Consultation Leaflet – which set out the key implications of all the 'Draft Preferred Options' documents, the consultation arrangements and how people could get involved. This leaflet was distributed to every household (approximately 57,000) in the District via the Royal Mail.
- An article was placed in the Council's own newsletter, 'Your District Matters' which again was distributed to every household within the District.
- Following local press interested, articles appeared in all the local newspapers, including the Lancaster & Morecambe Guardian and the Morecambe Visitor.
- A general email went out to all members of the Local Plan Database notifying them of the consultation process, the implications of the documents and how to get involved.
- The Council's website was fully updated to ensure that interactive copies of the document were available to download, this included downloadable version of all supporting documents and evidence base (including Sustainability Appraisal).

Draft Preferred Options’ Consultation 22 October 2012 to 14 December 2012

- Further to the general consultation events already mentions, specific sections of the community were targeted for further consultation. This included a Parish Council Forum taking place at Lancaster Town Hall on the 18th October 2012. The business sector were also given specific opportunities to contribute to the consultation process with a series of Business Events taking place on the 20th November 2012 and 27th November in locations at Lancaster and Morecambe.
- In addition to the general mail out, the Council sought engagement through other electronic means such as Facebook and Twitter.
- The Consultation Exhibition boards, whilst not being used for specific events were left in public places such as local libraries and town halls to ensure that the consultation received the largest coverage possible.

APPENDIX C: LOCAL PLAN CONSULTATION 2014 - 2017

It is important that this Consultation Statement is read in conjunction with the Duty to Co-operate Statement of Compliance which sets out the Council’s approach to engaging with neighbouring authorities.

All documents can be viewed on the council website or in the Document Library.

Key dates and stages are described in [Appendix D](#).

Meeting Future Housing Needs Consultation - 2 June 2014 to 31 July 2014

In summer 2014 it was becoming clear that many new jobs and homes were needed and the council consulted on five “Strategic Options” for meeting these needs: urban extensions, reviewing the Green Belt, distributing development throughout the district, the significant expansion of a limited number of villages, and building a whole new settlement. This consultation set a starting point for investigating how greater development needs could be addressed in the district.

Officers spoke to 1,046 during the 14 consultation drop in events held across the district. 554 responses were received to the consultation including 452 questionnaire responses (including 25 organisations) and 102 emails/letters.

In conclusion there was a mixed response to each option, however, the overall response suggests that Option 1: A Single Large Urban Extension, was the most preferred option and Option 5: A New Settlement was the least preferred. The main advantages for Option 1 was the available infrastructure and employment, whereas these were the main disadvantages for Option 5. Although some suggested that a purpose built development would be an opportunity to encompass and improve this, as well as developing an eco-town/garden city.

Infrastructure (in particular the roads and traffic congestion) was also raised as a key concern for Option 1. Traffic implications were also raised as an issue for Options 3: Developing throughout the district’s towns and villages and Option 4: Large-scale development of two villages.

The opportunity to link to the new M6 link road was highlighted, particularly under Option 2: Reviewing the Green Belt. As expected, house builders and agents also support a review of the Green Belt. However, it was recognised that strategic gaps needed to be provided to maintain settlement identities.

Meeting Future Housing Needs Consultation - 2 June 2014 to 31 July 2014

The opportunity to improve and sustain infrastructure and services and ensure the vitality of rural communities were raised as advantages for both Options 3 and 4.

The need to prioritise brownfield and empty properties, to protect the AONB/green fields/agricultural land/green belt, avoid landscape and biodiversity impacts, avoid merging villages and towns were raised as key issues throughout.

The impact on villages/rural communities and their character was highlighted under most of the options but in particular Options 3 and 4. All options attracted comments relating to infrastructure, service provision and employment with concern that existing services would be unable to support the level of additional housing proposed. The need to limit development and ensure it was in keeping with the local area was also raised. The need for affordable/mixed housing provision, to help retain young people in particular, was highlighted under these options.

Questions were raised over reliance on a single large scale site and concern that the options were not flexible enough should they fail to deliver at the rate envisaged. A hybrid approach was offered as a solution to help meet the projected housing need and reduce the impact on one area of the district.

Local Green Space Methodology Consultation 27 January 2015 – 27 February 2015

The council consulted on a Local Green Space methodology in February 2015. The methodology was updated to take account of the comments raised.

The methodology was also presented and discussed at the Lancaster Green Space Forum on the 26th January 2015. Officers have met regularly with the Green Space Forum throughout the process presenting information on the work undertaken to date and keeping the group informed of the assessment work.

Comments received during the consultation and discussed at the forum informed preparation of the final methodology.

Following this the council undertook a call for site exercise in April 2015 inviting the community to submit sites which they would like to be considered as a Local Green Space in the Local Plan. Another call for sites exercise was opened in June 2016.

Green Belt Review 19 October 2015 to 30 November 2015

The Council consulted on a Draft Green Belt Review Methodology in late 2015 and received a total of 48 comments on its content. Many of the responses received provided suggestions to how the Green Belt Review methodology would be refined and improved. These comments have been used to refine the methodology for use of part of the Green Belt Review. Appendix A of the Consultation Report sets out all the comments which were received on the draft methodology, along with an officer's response to those comments and whether they would be given consideration in refining the methodology.

Key issues which were raised as part of the consultation of the Draft Methodology included the following:

- That the Green Belt Review remained impartial, not driven by individual interests which is subject to an independent panel.

Green Belt Review 19 October 2015 to 30 November 2015

- That assessment of the Green Belt parcel should be done both individual but also in relation to its wider role and function within the locality.
- Amendments to be made to the scoring

The above issues have been taken into consideration in refining the methodology and are reflected in the methodology.

People, Homes and Jobs consultation - 19 October 2015 to 30 November 2015

In October 2015 the council asked the community again to consider approaches for meeting housing needs and job requirements in the 'People, Homes and Jobs' consultation. This identified a hybrid option for meeting development needs using elements of the approaches from the previous consultation: urban expansion of the main settlement of Lancaster, a review of the Green Belt, and, the potential significant expansion of the village of Dolphinhholme. The other potential approaches, distributing development throughout the district and the building of a new settlement were not further advanced because these options had greater infrastructure and environmental constraints.

The consultation was widely promoted and as a result officers spoke to over 900 people and received 975 responses to the consultation including 225 paper and online consultation response forms, 375 letters (262 of these were a pre-prepared letter in relation to GB4 Slyne with Hest), 375 emails from 279 people (some people sent multiple emails, mainly in relation to VE1 to VE5 Dolphinhholme).

In summary, much of the feedback has been similar to the 2014 consultation. There does seem to be more recognition for the need for housing and employment, although the majority still have doubts about the projected housing and employment figures. However, some builders and agents have again suggested that the approach lacks aspiration and that the figures should be increased to provide more flexibility.

Following the consultation, the options have been refined further; looking at the potential constraints to development, and how they may be overcome, the availability of land to meet development needs, and the response from the community and stakeholders on the achievability of the hybrid option. A range of the most suitable, available and achievable sites are now shown in the draft local plan.

Statement of Community Involvement Consultation November 2016

To ensure that there was an opportunity for the community and stakeholders to comment again on how forthcoming consultations in 2017 and beyond are conducted we are sought views on a revised Statement of Community Involvement (SCI) in November 2016. Comments informed the final SCI.

Regulation 18: Consultation on the Draft Local Plan for Lancaster District 27 January 2017 to 24 March 2017

[Section 5](#) of this statement outlines how the Council engaged in this round of consultation.

[Section 6](#) outlines what issues were raised

[Section 7](#) outlines how these issues have been addressed.

Gypsy and Traveller Accommodation Assessment (GTAA) Stakeholder Consultation 2017

The council consulted with stakeholders on the Gypsy and Traveller Accommodation Assessment (GTAA). Consultation took place in May 2017 with 18 key stakeholder and 30 interviews with Gypsy and Traveller households and seven houseboat-dweller households living within the study area. The consultation was managed by independent consultant arc4.

Feedback from the consultation was summarised in the GTAA Report by arc4, and this has helped to inform the Local Plan in meeting the needs of the Gypsy, Traveller and Travelling Showpeople community. The Council is also shortly to commence preparation of a Gypsy and Traveller Allocations DPD to meet unmet and future needs.

During 2017 the Council have undertaken a number of other significant pieces of evidence which have informed the preparation of the Local Plan. To ensure that interested parties are engaged with the preparation of evidence and understand how such evidence is collected, the Council have consulted on the methodologies for a number of pieces of evidence which include:

- Heritage Impact Assessment Methodology Consultation
- Sustainable Settlement Review Methodology Consultation
- Strategic Housing and Employment Land Methodology Consultation

Heritage Impact Assessment Methodology Consultation May to June 2017

We consulted on draft methodology for Heritage Impact Assessment for potential site allocations within the Local Plan for 4 weeks.

The purpose of a Heritage Impact Assessment (HIA) is to:

- Identify any heritage asset(s) impacted by the potential site allocation
- Identify any impact on the significance of the asset(s) that would result from the potential site allocation
- Consider maximising enhancements and mitigating any harm through the potential site allocation
- Make conclusions on whether the site allocation will conserve the heritage asset in an appropriate manner to its significance

Comments on the draft methodology consultation informed the final methodology and HIAs for the potential site allocations.

Sustainable Settlement Review Methodology Consultation June to July 2017

Consultation on the Sustainable Settlements Review Methodology took place for a 4 week period between 19th June 2017 and 17th July 2017. The City Council published the proposed Sustainable Settlements Review methodology (with two associated appendices) which set out in detail how all of the settlements within the district would be assessed. Following the policy and guidance provided within the NPPF and NPPG, there are five key areas which the review proposed to focus upon; population, provision of services and facilities, employment opportunities, accessibility and landscape/townscape. Comments received during the draft methodology consultation informed the final methodology, which is available to view on the Council's website.

**Strategic Housing and Employment Land Methodology Consultation
August to September 2017**

National guidance sets out a very comprehensive process for identifying and assessing whether land is suitable, available and achievable for housing and economic development over the plan period. The proposed methodology is based on this guidance.

A draft methodology was consulted on for 5 weeks between Friday the 4th August and Friday 8th September. This methodology takes account of the comments raised.

The methodology was also subject to a developer workshop on the 17th October 2017.

In light of the comments received the methodology was amended and reported to the Council's Planning Policy Cabinet Liaison Group for approval on the 28th November 2017.

Household Survey 20 June 2017 to 19 July 2017

A household survey was undertaken to help Lancaster City Council gather information on the housing needs for people living in the Lancaster district over the coming years, including the size and type of housing which is more likely to meet the needs of residents.

The survey took place during June and July 2017 and was managed by independent consultant arc4. Approximately 28,000 households were sent a survey, including every occupied household in rural areas of the district. Other interested parties including developers, housing associations, estate agents, housing and disability charities were also asked for their input on housing market needs and conditions.

Feedback from the survey was summarised in a Strategic Housing Market Assessment Report and arc4's recommendations have helped to inform the Local Plan.

**Strategic Housing Market Assessment Stakeholder Consultation
20 June 2017 to 19 July 2017**

In July 2017 the council consulted with stakeholders to capture a range of views on specific housing themes. The consultation included topics such as current and future housing needs as well as specific questions on the private rented sector, affordable housing and specific groups.

Stakeholders included developers, agents, neighbouring authorities, the voluntary sector and other departments within the City Council concerned with housing need.

Open Space Consultation November to December 2017

Lancaster City Council is working to better understand open space provision across the area. It has commissioned Knight, Kavanagh & Page (KKP) to carry out an assessment of open space across the Lancaster and Morecambe area. The study examined the quality, distribution and role of open spaces. The assessment provides a key piece of evidence that will inform future strategic planning and decision-making processes for open space across the area. To help inform this study a consultation meeting was held with the Green Space Forum, which is a collection of friends and interest groups linked to open space provision across the district. An online community survey was also held. This included questions to investigate the frequency of visits to open space typologies, accessibility, availability, quality and importance.

Neighbourhood Planning
<p>The local authority area includes 10 areas which have been designated for neighbourhood plan purposes including Wray-with-Botton, Caton-with-Littledale, Cockerham, Halton-with-Aughton, Morecambe, Slyne-with-Hest, Dolphinholme, Wennington, Arkholme-with-Cawood and Carnforth.</p> <p>The Council have continually engaged, supported and assisted neighbourhood plan groups in the preparation of neighbourhood plans and have sought wherever possible for challenging planning decisions to be made locally through the neighbourhood plan process, for example the allocation of sites.</p> <p>The Council have supported neighbourhood plan groups through attending a range of meetings, providing information, evidence and advice upon request and schedule briefings to keep groups up-to-date on the preparation of the district-wide local plan.</p>

APPENDIX D: CONSULTATION / ENGAGEMENT KEY DATES

It is important that this Consultation Statement is read in conjunction with the Duty to Co-operate Statement of Compliance which sets out the Council's approach to engaging with neighbouring authorities.

Consultation Events	Dates
Other engagement on the Local Plan	April 2017 to present day 2018
<ul style="list-style-type: none"> Heritage Impact Assessment Methodology Consultation 	<ul style="list-style-type: none"> 15 May 2017 to 12 June 2017
<ul style="list-style-type: none"> Sustainable Settlement Review Methodology Consultation 	<ul style="list-style-type: none"> 19 June 2017 to 17 July 2017
<ul style="list-style-type: none"> Sustainable Settlement Review Stakeholder Workshop Sustainable Settlement Engagement with Parish Councils 	<ul style="list-style-type: none"> 17 October 2017 October 2017 to January 2018
<ul style="list-style-type: none"> GTA Stakeholder Consultation Lancashire Wide Officer Group, Gypsy, Traveller, Travelling Showpeople 	<ul style="list-style-type: none"> 15 May to 30 May 2017 28 September 2017
<ul style="list-style-type: none"> House Hold Survey 	<ul style="list-style-type: none"> June 2017 to July 2017
<ul style="list-style-type: none"> Strategic Housing Market Assessment Stakeholder Consultation 	<ul style="list-style-type: none"> 20 June 2017 to 19 July 2017
<ul style="list-style-type: none"> Strategic Housing and Employment Land Availability Assessment (SHELAA) Methodology Consultation SHELLA Stakeholder Workshop 	<ul style="list-style-type: none"> 4 August 2017 to 8 September 2017 17 October 2017
<ul style="list-style-type: none"> Neighbourhood Plan Parishes Briefing 	<ul style="list-style-type: none"> 1 November 2017
<ul style="list-style-type: none"> Local Plan Open Space Consultation 	<ul style="list-style-type: none"> 7 November 2017 to 8 December 2017
<ul style="list-style-type: none"> Viability Study Stakeholder Consultation (Housing Developers / Landowners / Planning Consultants) Viability Study Stakeholder Event (as above) 	<ul style="list-style-type: none"> 16 November 2017 to 5 December 2017 15 November 2017
The 'Developing a Local Plan for Lancaster District' consultation (Regulation 18 / Preferred Options)	Consultation from 27 January 2017 to 24 March 2017

Consultation Events	Dates
<p>8 Week Events at the following locations:</p> <ul style="list-style-type: none"> Lancaster Methodist Church, Scotforth Road Christ Church Hall, Wyresdale Road Carnforth Heritage Centre, Carnforth Station Central Lancaster High School, Crag Road St Nicholas Arcade, Lancaster City Centre Ellel Village Hall, Main Road, Galgate Carnforth Civic Hall, North Road, Carnforth Middleton Parish Hall, Low Road Morecambe Library, Central Drive Beaumont College, Slyne Road Rowley Court, Scotforth Road Hala St Paul's Community Centre, Hala Square Hornby Institute, Main Street, Hornby Lancaster Library, Market Square Lancaster House Hotel, Green Lane, South Lancaster 	<ul style="list-style-type: none"> 6 February 2017 8 February 2017 9 February 2017 14 February 2017 18 February 2017 20 February 2017 21 February 2017 23 February 2017 28 February 2017 1 March 2017 2 March 2017 6 March 2017 7 March 2017 8 March 2017 13 March 2017
<ul style="list-style-type: none"> CALC Parish Group Members 	<ul style="list-style-type: none"> 30 January 2017
<ul style="list-style-type: none"> Neighbourhood Plan Parishes (contact via letter) Slyne Neighbourhood Plan Group meeting Wray Neighbourhood Plan Group meeting Wray Neighbourhood Plan Group meeting Carnforth Neighbourhood Plan Group meeting Morecambe Neighbourhood Plan Group meeting Dolphinholme Neighbourhood Plan Group meeting 	<ul style="list-style-type: none"> 27 January 2017 17 January 2017 15 February 2017 23 November 2017 22 February 2017 7 March 2017 10 March 2017
Statement of Community Involvement Consultation	October to November 2016
People, Homes and Jobs consultation (issues and options)	Consultation from 19 October 2015 to 30 November 2015
<p>Events at the following locations:</p> <ul style="list-style-type: none"> Ellel Village Hall, Main Road, Galgate Dolphinholme Village Hall Lancaster and Morecambe College Carnforth Heritage Centre, Carnforth Station Slyne Memorial Hall Lancaster Methodist Church, Scotforth Road 	<ul style="list-style-type: none"> 20 October 2015 21 October 2015 22 October 2015 27 October 2015 28 October 2015 29 October 2015
Call for Sites	2015
Publication on Call for Sites	September 2015 and ongoing
Local Green Space Review	2015
<ul style="list-style-type: none"> Local Green Space Methodology Consultation Lancaster District National Housing Sub-group Lancaster District Local Housing Sub-group 	<ul style="list-style-type: none"> 27 January 2015 – 27 February 2015 26 November 2015 1 December 2015
Green Belt Review	2015
<ul style="list-style-type: none"> Green Belt Review 	<ul style="list-style-type: none"> 19 October 2015 to 30 November 2015
Meeting Future Housing Needs Consultation (issues and options)	Consultation from 2 June 2014 to 31 July 2014
<p>Events at the following locations:</p> <ul style="list-style-type: none"> Morecambe Arndale Centre Carnforth Tesco 	<ul style="list-style-type: none"> 3 June 2014 4 June 2014

Consultation Events	Dates
<ul style="list-style-type: none"> • Heysham Library • Ellel Village Hall, Main Road, Galgate • Barton Road Community Centre (Scotforth) • Dolphinhholme Village Hall • St Nicholas Arcade, Lancaster City Centre • Torrisholme Methodist Church • Bolton Le Sands Village Hall • The Centre (Halton) • Victoria Institute (Caton) • Nether Kellet Village Hall • Hornby Institute, Main Street, Hornby • Fraser Hall (Cowan Bridge) 	<ul style="list-style-type: none"> • 5 June 2014 • 10 June 2014 • 11 June 2014 • 12 June 2014 • 14 June 2014 • 17 June 2014 • 18 June 2014 • 19 June 2014 • 24 June 2014 • 25 June 2014 • 26 June 2014 • 27 June 2014
Call for Sites	2013
Publication on Call for Sites	10 May 2013
Draft Preferred Options' Consultation	Consultation from 22nd October 2012 to 14th December 2012
<p>Events at the following locations:</p> <ul style="list-style-type: none"> • Heysham Library • Morecambe Library • Bolton-le-Sands Village Hall • Lancaster Market Square • St Pauls Parish Hall, Scotforth • Silverdale Gaskell Hall • Middleton Village Hall • Carnforth Railway • Lancaster Market Square • University of Cumbria • Lancaster University • Hornby Institute • Caton Victoria Institute • Galgate Village Hall • Marsh Community Centre • The Centre, Halton 	<ul style="list-style-type: none"> • 29 October 2012 • 30 October 2012 • 31 October 2012 • 3 November 2012 • 6 November 2012 • 8 November 2012 • 9 November 2012 • 12 November 2012 • 14 November 2012 • 16 November 2012 • 22 November 2012 • 26 November 2012 • 28 November 2012 • 30 November 2012 • 4 December 2012 • 6 December 2012
'Developing the Options' Consultation	Consultation from 11th July 2011 to 16th September 2011
<p>Events at the following locations:</p> <ul style="list-style-type: none"> • Lancaster Market Square • Silverdale Memorial Hall • Lancaster Library • Carnforth Library • Hornby Institute • Lancaster Market Square • Carnforth Market • Morecambe Platform • Morecambe Arndale 	<ul style="list-style-type: none"> • 13 July 2011 • 19 July 2011 • 21 July 2011 • 25 July 2011 • 28 July 2011 • 30 July 2011 • 3 August 2011 • 6 August 2011 • 11 August 2011
<ul style="list-style-type: none"> • Meeting with the Sustainability Partnership • Parish Council Forum at Lancaster Town Hall • Meeting with Carnforth Town Council • Business Breakfast at Lancaster & Morecambe College • Business Afternoon tea at the Lancaster Storey Institute 	<ul style="list-style-type: none"> • 12 July 2011 • 18 July 2011 • 25 July 2011 • 11 August 2011 • 17 August 2011

Consultation Events	Dates
Spatial Planning Exercises	Consultation from February 2011 to March 2011
Events at the following locations: <ul style="list-style-type: none"> • Lancaster Storey Institute • Morecambe Platform • Carnforth Railway Station • Hornby Institute • Heysham Community Centre 	<ul style="list-style-type: none"> • 9 February 2011 • 15 February 2011 • 23 February 2011 • 2 March 2011 • 10 March 2011
Call for Sites	January 2011
Publication on Call for Sites	<ul style="list-style-type: none"> • 21 January 2011
Rural Communities	Consultation from September 2010 to November 2010
Rural engagement exercise with surveys sent out to 35 Parish Councils in the district and varies meetings during November and December 2010: <ul style="list-style-type: none"> • Hornby Parish Council • Caton Parish Council • Ellel Parish Council • Halton Parish Council 	<ul style="list-style-type: none"> • 11 November 2010 • 1 December 2010 • 8 November 2010 • 8 December 2010
Thematic Group Workshop (objectives refines)	<ul style="list-style-type: none"> • October to November 2010
<ul style="list-style-type: none"> • Sustainable Transport Solutions Workshop • Renewable Energy and Climate Change Workshop • Green Infrastructure Workshop • Meeting Economic Needs Workshop • Future Development Needs Workshop 	<ul style="list-style-type: none"> • 12 October 2010 • 21 October 2010 • 5 November 2010 • 12 November 2010 • 18 November 2010
Combined Scoping Exercise of the Development Plan Documents	Consultation from 25th June to the 6th August 2010
6 Week Consultation with a number of events across the district. Drop in sessions were held at: <ul style="list-style-type: none"> • Lancaster Library • Morecambe Library • Carnforth Library • Hornby Village Institute 	<ul style="list-style-type: none"> • 13 July 2010 • 14 July 2010 • 15 July 2010 • 22 July 2010 • 19 July 2010 • 27 July 2010

Member Briefings (Lancaster City Councillors)	Dates
<ul style="list-style-type: none"> • GTAA / SHMA Drop-in Session • Local Plan Drop-in Session • Local Plan Drop-in Session • Local Plan Drop-in Session • Local Plan Drop-in Session • Local Plan SFRA Evidence Update • JBA – Local Plan / Water Management • Turley – OAN Verification of Housing Needs 	<ul style="list-style-type: none"> • 29 September 2017 • 10 November 2016 • 17 November 2016 • 26 October 2017 • 8 November 2017 • 12 December 2017 • 24 January 2018 • 14 February 2018

It is important that this Consultation Statement is read in conjunction with the **Duty to Co-operate Statement of Compliance** which sets out the Council's approach to engaging with key stakeholders.

Other Stakeholder Events	Dates
<ul style="list-style-type: none"> • Marine Management Organisation • United Utilities • Environment Agency • Lancashire County Council Education Services • Lancashire County Council Public Health • Clinical Governance Group • Lancashire Minerals and Waste Team • Highways England • Internal Public Health Team • Natural England • Canal and River Trust • Historic England 	<ul style="list-style-type: none"> • See Duty to Cooperate Statement for details on dates
<ul style="list-style-type: none"> • Housing Developer Forum 	<ul style="list-style-type: none"> • 2 September 2014 • 29 September 2015 • 27 September 2016 • 5 October 2017
<ul style="list-style-type: none"> • Green Space Group 	<ul style="list-style-type: none"> • 20 October 2014 • 26 January 2015 • 18 November 2015 • 14 February 2017 • 8 February 2018
<ul style="list-style-type: none"> • Local Green Space Working Group 	<ul style="list-style-type: none"> • 7 October 2017 • 30 October 2017
<ul style="list-style-type: none"> • Businesses Breakfast Briefing 	<ul style="list-style-type: none"> • 16 September 2016 • 8 March 2017

APPENDIX E: SUSTAINABILITY APPRAISAL AND HABITATS REGULATION ASSESSMENT

Meetings and workshops	Dates	Stage
Environment Agency Scoping Meeting	26 May 2010	SA Scoping Report
Historic England Scoping Meeting	17 June 2010	
Natural England Scoping Meeting	17 June 2010	
SA Scoping Report consultation	5 week consultation period 25 June 2010 to the 6 August 2010	
SA Panel Introductory workshop including initial appraisal of draft land allocation and development management objectives	8 February 2011	Developing the Options Consultation
SA workshop for Development Management Options Paper (included 3 statutory consultees)	23 May 2011	

Meetings and workshops	Dates	Stage
SA workshop for Land Allocations Options Paper (included 3 statutory consultees)	6 June 2011	
SA workshop for Development Management document	1 May 2012	Draft Preferred Options
Informal consultation with the three SEA statutory bodies	8 May 2012 – 21 May 2012	
SA workshop for Land Allocations document	16 May 2012	
Consultation on the SA Preferred Options Land Allocations and Development Management Documents	22 October 2012 – Friday 14 December 2012	
Meeting with English Heritage	25 September 2012	
Meeting with Natural England	3 December 2012	
SA workshop for Spatial Options consultation (Natural England attended)	13 May 2014	Meeting Future Housing Needs Consultation
Consultation on SEA and SA Report of the Strategic Options	2 June 2014 – 31 July 2014	
Natural England Meeting	30 September 2014	
Meeting with the Environment Agency	25 October 2014	
Meeting with Natural England and Fylde and Sefton Council's to discuss Pink Footed Geese	1 April 2015	People Homes and Jobs Consultation
SA workshop for People Homes and Jobs consultation (3 SEA bodies attended)	1 October 2015	
Meeting with Natural England	1 October 2015	
Natural England Meeting	16 November 2015	
Consultation on SEA and SA report	19 October - 30 November 2015	
Meeting with the Environment Agency	22 October 2015	
Meeting with Historic England	10 November 2015	
Meeting with Natural England	18 January 2016	
Meeting with Environment Agency	22 October 2016	
Meeting with Natural England	4 April 2017	Draft Strategic Policies & Land Allocations DPD and revised Draft Development Management DPD
Consultation on SA and HRA reports for the Strategic Policies & Land Allocations DPD and the Review of the draft Development Management DPD	27 January – 24 March 2017	
Natural England and Morecambe Bay Partnership meeting	25 September 2017	