

### **Matter 3: Spatial Strategy**

#### **Main Issue: Whether the Council's spatial strategy for development within the District is sound?**

##### *Questions:*

- a) Is the spatial strategy as set out in policies SP1, SP2, SP3, SP4, SP5 and SP6 and their supporting text soundly based? Is the settlement hierarchy soundly based? Would the spatial strategy be sound if no provision was made for any unmet housing need for Lancaster District either within the District or within the wider Strategic Housing Market Area?**

*The Council's response to this question is substantially the same as that already supplied to Question 9 of the Inspector's Initial Questions.*

- 3A.1 The starting point for Strategic Policies & Land Allocations DPD is the inclusion of a model policy which sets out the presumption in favour of sustainable development. The inclusions of a model policy reflect the structure set out within the Council's earlier post-NPPF document (the Development Management DPD adopted in 2014). Whilst the Council acknowledges the publication of the reviewed NPPF in 2018 it still considers the inclusion of the model policy is a robust and sound starting point for plan-making.
- 3A.2 The starting point for the settlement hierarchy is set out in Policy SP2 of the Strategic Policies & Land Allocations DPD. Policy SP2 of the Strategic Policies & Land Allocations DPD seeks to update and review the position towards the settlement hierarchy as set out in the 2008 Lancaster District Core Strategy.
- 3A.3 With regard to the main urban settlements of the district – Lancaster, Morecambe, Heysham and Carnforth – the Council considers that there has been no material change in circumstance since the 2008 Core Strategy that would result in a change to their positioning within the settlement hierarchy. The Council believes that due to their level of service provision, accessibility and population density that these remain the main urban areas of the district.
- 3A.4 To inform the Council's understanding of the settlement hierarchy outside of the main urban areas, the Council has undertaken a Sustainable Settlement Review which has, in considerable detail, considered the current and future role of each settlement in the district. The Review has allowed the Council to assess their sustainability, in accordance with the NPPF, and consequently their ability to accommodate development needs through the plan period.
- 3A.5 The review focused upon five areas to aid the assessment of sustainability which included:
- *Landscape / Townscape* (consideration given to Conservation Areas and Designated Protected Landscapes such as Areas of Outstanding Natural Beauty).

- Population (consideration given to population density and age).
- Provision of Services and Facilities (consideration given to 'key services', 'other services' – their quantity / value / importance and quality).
- Accessibility (consideration given to public transport, cycle and walking links, their provision / extent and frequency).
- Employment Opportunities (consideration given to local employment sites and accessibility).

- 3A.6 Prior to the commencement of the review its methodology was subject to a 4 week consultation period in 2017 which included a workshop event. Parish Councils were also invited to participate in the review process and asked to complete questionnaires. Overall 32 responses were received, within which approximately 156 individual comments were made. These were subsequently taken into careful consideration and used to inform changes to the proposed methodology for the Sustainable Settlement Review.
- 3A.7 The data was collated utilising a combination of primary research methods which included settlement site visits and parish council questionnaires and secondary data sets. In total, outside the four main urban areas, 71 settlements were identified across the district. The conclusion of the review was that 15 settlements assessed fulfilled the criteria of being a sustainable settlement and have been identified accordingly through Policy SP2 of the Strategic Policies & Land Allocations DPD.
- 3A.8 The Council believes that the settlement hierarchy outlined in Policy SP2 of the Strategic Policies & Land Allocations DPD is informed by robust evidence and is soundly based.
- 3A.9 Policy SP3 sets out a spatial development strategy which, in spatial terms, demonstrates how development should be spatially delivered across the district. The development strategy has been prepared following extensive consultation with the wider public, stakeholders and the development industry over how and where development needs should be met. In particular the development strategy has been shaped through the 2014 and 2015 consultation on spatial options for development which included 5 basic options for meeting future growth:
1. Urban Extension
  2. Green Belt Release
  3. Rural Dispersal
  4. Expansion of Rural Settlements
  5. Creation of a New Settlement
- 3A.10 Consideration of these spatial options, in parallel with the Duty-to-Cooperate process and the preparation of a comprehensive Brownfield Register, has led the Council to conclude that the urban-focused approach with the strategic release of greenfield sites to be the only realistic way to address development needs moving forward. The Council considers the process which has taken place to understand how future development is delivered to have been comprehensive and robust.

- 3A.11 The Council recognises the importance of a strong and competitive economy and the number of existing (and potential) opportunities which will generate economic growth through the course of the plan period.
- 3A.12 The Council has prepared a range of assessments and studies in relation to economic growth and job creation which have informed the preparation of the Local Plan. In particular the preparation of the 'Achieving Economic Potential in Lancaster District' report which has been prepared in dialogue with existing economic stakeholders in the district. The report considers the economic potential for the district, highlighting the opportunities for growth. These opportunities for economic growth are well described via Policy SP4 with the spatial implications of achieving these opportunities described in Policy SP5. The Council believes the economic growth potential expressed in the Local Plan (as submitted) seeks to strike the correct balance between being aspiration and ambitious whilst remaining realistic.
- 3A.13 With regard to Policy SP6, the Council has undertaken a range of assessments and studies which seeks to provide a clear picture on what the objectively assessed housing needs of the district are. This work has been undertaken in accordance with national planning guidance in regard to preparing assessments for local housing need. This is considered by the Council to be a sound piece of evidence which can robustly inform the preparation of the Local Plan. How the Council has sought to address the objectively assessed needs is set out in separate responses to Matter 2 which specifically relates to housing.
- 3A.14 With regard to distribution of future housing across the district, the Council has extensively investigated the availability of land for development through a range of 'Call for Sites' processes and public consultation. The Council throughout the planning process has been receptive to sites being submitted for consideration in the Local Plan.
- 3A.15 The Council has sought to assess sites suitability, deliverability and achievability firstly through the preparation of a Strategic Housing Land Availability Assessment (SHLAA) and more latterly a Strategic Housing and Employment Land Availability Assessment (SHELAA). These have been extensive undertakings for the Council and has provided key information to inform the allocation of land, or the non-allocation of land within the Local Plan.

#### Impacts of Unmet Housing Need

- 3A.16 It is considered that the spatial strategy would be sound if no provision was made for any unmet housing need for Lancaster District either within the District or within the wider Strategic Housing Market Area. Paragraph 14 of the 2012 NPPF states that "local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
- 3A.17 Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in this Framework taken as a whole."

3A.18 For reasons set out in question Matter 2 question (b), the Council is of the view that the constraints are sufficient justification for not meeting the full OAN for housing in the District. These reasons include highways, environmental designations, flood risk and green belt. The district is recognisably constrained which prevents alternative spatial strategies from being a realistic prospect that would be either be sustainable or deliverable. Whilst it is recognised that there are impacts of a housing requirement which falls below the OAN, it is considered that the impacts of an alternative spatial strategy which met the OAN in full would result in demonstrable and significant adverse impacts outweighing any benefit.

3A.19 For reasons outlined in Matter 1, question (b) there are strong reasons why it is not possible to meet unmet need in the adjoining Housing Market Areas as a result of weak commuting links, high degrees of self-containment and considerable differences in house prices. However, for clarity here it is considered important to reiterate that the Housing Market Area for Lancaster is the district, given the high levels of self-containment and therefore reference to the wider market area is somewhat misleading. Again therefore it is considered that the spatial strategy is sound despite the level of unmet need.

**b) Policies SG1, SG2, SG3 and TC1 (Bailrigg Garden Village), Policies SG7 and SG8 (East Lancashire Strategic Site), SG9 and SG10 (North Lancaster) and SG11, SG12 and SG13 (South Carnforth): are the need and locations for these mixed-use developments soundly based on, and justified by, the evidence assembled by the Council in support of the DPDs?**

3B.1 Given the direction provided via Policy SP3 of the Strategic Policies & Land Allocations DPD in that the Development Strategy seeks an Urban Focused approach towards development which is supplemented by the allocation of larger strategic greenfield sites, this has focussed the direction of future growth through the plan period.

3B.2 The Council has therefore sought to investigate the need for development in the main urban areas of the district, utilising areas of brownfield land for re-use where it is reasonable and appropriate to do so, and consider the suitability of allocating large strategic greenfield sites which are well connected to urban areas.

3B.3 To investigate options for strategic sites, the Council considered a range of strategic site options through the course of the 'People, Homes and Jobs' consultation of 2015 (**C\_IO\_1\_002**). At that time, this consultation process considered all known strategic sites which had strong connections to the main urban areas of the district. The outcomes of the 2015 consultation assisted the Council in concluding on the suitability and appropriateness of strategic sites to deliver future development needs within the Plan. In preparing the Plan the Council has concluded that the sites below provide the most suitable and appropriate distribution of strategic sites across the urban area of the district.

- 3B.4 It is important to note that the strategic sites identified all require infrastructure to be delivered to a greater or less extent prior to delivery of new housing. In proposing the stepped approach towards housing delivery (which is described in more detail via Matter 2) it is important to be recognise that delivery / build out rates are expected to increase as the strategic sites become more established and the necessary infrastructure provided. This is particularly the case for sites such as Bailrigg Garden Village.
- Broad Area of Growth in South Lancaster & Bailrigg Garden Village
- 3B.5 Through Policy SG1 of the Strategic Policies & Land Allocations DPD the Council has identified a significant area of land to the South of Lancaster as a 'broad area of growth' associated with Bailrigg Garden Village.
- 3B.6 The scale of this proposal is significant within the region of 3,500 new homes proposed, employment and commercial space and other associated infrastructure. The delivery of the growth in the South of Lancaster is very much dependent on the provision of strategic transport infrastructure that seeks to address the significant capacity issues on the A6 Corridor to the South of the City. The City Council has supported Lancashire County Council in preparing a bid to the Government's Housing Infrastructure Fund (HIF) for a number of infrastructure projections which include:
- The reconfiguration of Junction 33 of the M6.
  - A new link road from the newly reconfigured junction into the Garden Village area.
  - The creation of a Bus Rapid Transit System to link the Garden Village and University to Lancaster City Centre.
  - The creation of a Cycling and Walking Superhighway from the South of the City into Lancaster City Centre.
- 3B.7 The bid was submitted to the Government on 22<sup>nd</sup> March 2019 and the Councils are awaiting the outcome of the Government's decision on funding. This is anticipated to be announced over the course of summer 2019.
- 3B.8 Initially the Council sought to move forward the strategic growth proposed in South Lancaster directly through the Local Plan process (Strategic Policies & Land Allocations DPD). However, the scale of development and the issues to address make clear that it would be necessary to consider growth in this area under a separate and specific development plan document. As a consequence the Council has, since late 2017, been preparing the Lancaster South Area Action Plan DPD. A series of issues and options for the area were consulted upon in 2018 and moving forward the Council anticipate that subject to a successful HIF bid to consult on a preferred options document later this year.
- 3B.9 The Council acknowledges that whilst the matters of detail around strategic growth are to be addressed in the Area Action Plan DPD, that the principle of development in this area must be recognised, considered and accepted through this Local Plan process.

- 3B.10 Accordingly Policy SG1 of the Strategic Policies & Land Allocations DPD sets the broad parameters for growth in the Lancaster South area and sets out a range of principles which the area specific DPD (and ultimately new development proposals in Lancaster South) should adhere to. Policy SG1 also sets out the mechanisms for preparing an Action Plan DPD.
- 3B.11 As with other strategic sites set out in the Local Plan (as described below) the Council has undertaken significant levels of evidence base and assessment work which have informed the high-level principle of the allocation and, as importantly, will inform the detailed matters of the forthcoming Area Action Plan DPD. This evidence includes:
- Level 1 Strategic Flood Risk Assessment (JBA 2017) **(En\_SFRA\_01)**
  - Level 2 Strategic Flood Risk Assessment (JBA 2018) **(En\_SFRA\_02)**
  - Landscape, Townscape & Visual Field Summary Report (Arcadis 2018) **(En\_LA\_03)**
  - Preliminary Ecological Appraisal, South Lancaster (Greater Manchester Ecology Unit 2016) **(En\_ES\_08.1)**
  - Preliminary Desk Top Ecological Assessment (Greater Manchester Ecology Unit 2017) **(En\_ES\_09)**
  - Wintering Bird Surveys of Sites in Lancaster under Consideration for Potential Future Development (Greater Manchester Ecological Unit 2017) **(EN\_ES\_15)**
  - Preliminary Ecological Appraisals (Greater Manchester Ecological Unit 2017) **(EN\_ES\_16)**
  - Breeding Bird Surveys of Land around Forest Hills / Hazelrigg, South Lancaster (Greater Manchester Ecology Unit 2017) **(EN\_ES\_18)**
  - Lancaster District Housing Sites – Initial Desktop Archaeological Assessment (2017) **(EN\_AA\_06)**
  - Heritage Impact Assessment for Sites (Lancaster CC 2018) **(En\_He\_05)**
  - Air Quality Position Statement (Air Quality Consultants 2019) **(AQ\_01)**
  - Local Plan Transport Assessment Part 1 (WYG) **(Tr\_02)**
  - Local Plan Transport Assessment Part 2 (WYG) **(Tr\_03)**
  - Local Plan Viability Assessment Stage 1 (Lambert Smith Hampton) **(VI\_01)**
  - Local Plan Viability Assessment Stage 2 (Lambert Smith Hampton) **(VI\_02)**
  - Infrastructure Delivery Schedule (Lancaster CC) **(VI\_03)**
- 3B.12 To supplement the evidence described above, the Council has considered the broad impacts of development through the Sustainability Appraisal process **(SD\_003 & SD\_004)** and, where necessary, modified the plan to take into account any recommendations arising from the appraisal process.
- 3B.13 In the preparation of the Local Plan (and the preparation of the Area Action Plan DPD) there has been extensive consultation with all key parties involved in future growth in South Lancaster including the local community, landowners / site promoters and other key stakeholders. Such extensive discussions will continue as part of the Action Plan process.
- 3B.14 The Council is comfortable that the broad area of growth has been informed by an appropriate and reasonable level of evidence, given that the Local Plan

only seeks to make in principle decisions about future development in this area. The Council clearly recognises that further evidence is necessary to inform the preparation of DPD which addresses detailed planning matters. A Concept Flood Risk and Drainage Strategy, a Geo-Technical Assessment and an Outline Drainage Strategy have been prepared to inform the forthcoming LSAAP DPD.

#### East Lancaster Strategic Site

- 3B.15 The delivery of approximately 900 dwellings at the East Lancaster Strategic Site (ELSS) makes an important contribution towards housing delivery in the plan period. This is in the context of the OAN and the challenges in delivery that have been described through responses to Matter 2 which relates to housing. The delivery of strategic sites through the plan period and the consistent rates of housing delivery they can provide over time is a significant part of the housing trajectory.
- 3B.16 In terms of the suitability of the site to deliver residential development, the Council has sought to inform their understanding of the suitability of the site through a wide range of evidence which includes:
- Level 1 Strategic Flood Risk Assessment (JBA 2017) **(En\_SFRA\_01)**
  - Level 2 Strategic Flood Risk Assessment (JBA 2018) **(En\_SFRA\_02)**
  - Landscape, Townscape & Visual Field Summary Report (Arcadis 2018) **(En\_LA\_03)**
  - Identified Sites Landscape and Visual Assessment (Arcadis 2018) **(En\_LA\_05)**
  - Urban Setting Landscape Designations for Lancaster North and Lancaster East (Galpin Landscape Architecture) **(En\_LA\_0.6)**
  - Preliminary Ecological Appraisal, East Lancaster (West of M6) (Greater Manchester Ecology Unit 2016) **(En\_ES\_03)**
  - Preliminary Desk Top Ecological Assessments – Potential Housing Sites (Greater Manchester Ecology Unit 2017) **(En\_ES\_09)**
  - Lancaster District Housing Sites – Initial Desktop Archaeological Assessment **(En\_AA\_05)**
  - Heritage Impact Assessment for Sites (Lancaster CC 2018) **(En\_He\_05)**
  - Cuckoo Farm and Ridge Farm, East Lancaster Geo-Environmental Desk Study Assessment (JBA 2018) **(Ge\_01)**
  - Local Plan Transport Assessment Part 1 (WYG) **(Tr\_02)**
  - Local Plan Transport Assessment Part 2 (WYG) **(Tr\_03)**
  - Local Plan Viability Assessment Stage 1 (Lambert Smith Hampton) **(VI\_01)**
  - Local Plan Viability Assessment Stage 2 (Lambert Smith Hampton) **(VI\_02)**
  - Infrastructure Delivery Schedule (Lancaster CC) **(VI\_03)**
- 3B.17 The evidence described above provides the Council with confidence that the allocation made for ELSS is sustainable and is sufficiently justified. Further to the evidence base work which has been undertaken by the Council on this matter, the Sustainability Appraisal process **(SD\_003 & SD\_004)** has thoroughly investigated the sustainability implications of the proposed allocation and has informed the preparation of the detailed policy.

- 3B.18 Throughout the plan process the Council has sought to engage with the site promoters and landowners for the site to ensure that issues relating to the suitability and delivery of the site are fully understood by all parties and investigated if required. Discussions over the delivery have been proactive and constructive to ensure that a positive approach is taken towards the delivery of the allocation. These discussions have been informed with ongoing dialogue with other key stakeholders to ensure all issues have been addressed.
- 3B.19 The Council is working with the Site Promoters and landowners of the ELSS in the preparation of Statement of Common Ground (S0CG). The Statement provides details on the current position of both the Council and site promoters in relation to a number of key planning matters and an indication of how the site can be delivered in the future. The Statement will be finalised and provided to the Inspector prior to the commencement of the Examination.

North Lancaster Strategic Site

- 3B.20 The delivery of approximately 700 dwellings at the North Lancaster Strategic Site (NLSS) makes an important contribution towards housing delivery in the plan period. This is in the context of the OAN and the changes in delivery that have been described through the responses to Matter 2 which relates to housing. The delivery of strategic sites through the plan period and the consistent rates of housing delivery they can provide over time is a significant part of the housing trajectory.
- 3B.21 In terms of the suitability of the site to deliver residential development, the Council has sought to inform their understanding of the suitability of the site through a wide range of evidence which includes:
- Level 1 Strategic Flood Risk Assessment (JBA 2017) **(En\_SFRA\_01)**
  - Level 2 Strategic Flood Risk Assessment (JBA 2018) **(En\_SFRA\_02)**
  - North Lancashire Green Belt Review (Lancaster CC) **(EN\_GBR\_01.1)**
  - Landscape, Townscape & Visual Field Summary Report (Arcadis 2018) **(En\_LA\_03)**
  - Identified Sites Landscape and Visual Assessment (Arcadis 2018) **(En\_LA\_05)**
  - Urban Setting Landscape Designations for Lancaster North and Lancaster East (Galpin Landscape Architecture) **(En\_LA\_0.6)**
  - Preliminary Ecological Appraisal, North Lancaster) (Greater Manchester Ecology Unit 2016) **(En\_ES\_04)**
  - Preliminary Desk Top Ecological Assessments – Potential Housing Sites (Greater Manchester Ecology Unit 2017) **(En\_ES\_09)**
  - Wintering Bird Surveys of Sites under consideration for future development (Greater Manchester Ecology Unit 2017) **(EnES\_15)**
  - Lancaster District Housing Sites – Initial Desktop Archaeological Assessment **(En\_AA\_05)**
  - Heritage Impact Assessment for Sites (Lancaster CC 2018) **(En\_He\_05)**
  - Hammerton Hall & Beaumont Hall, North Lancaster Geo-Environmental Desk Study Assessment (JBA 2018) **(Ge\_02)**
  - Local Plan Transport Assessment Part 1 (WYG) **(Tr\_02)**
  - Local Plan Transport Assessment Part 2 (WYG) **(Tr\_03)**

- Local Plan Viability Assessment Stage 1 (Lambert Smith Hampton) **(VI\_01)**
- Local Plan Viability Assessment Stage 2 (Lambert Smith Hampton) **(VI\_02)**
- Infrastructure Delivery Schedule (Lancaster CC) **(VI\_03)**

3B.22 The evidence described above provides the Council with the confidence that the allocation made for NLSS is sustainable and sufficiently justified. Further to the evidence base work that has been undertaken by the Council on this matter, the Sustainability Appraisal process **(SD\_003 & SD\_004)** has thoroughly investigated the sustainability implications of the proposed allocation and has informed the preparation of the detailed policy.

3B.23 Throughout the plan process the Council has sought to engage with the site promoters and landowners for the site to ensure that issues relating to the suitability and delivery of the site are fully understood by all parties and investigated if required. Discussions over the delivery have been proactive and constructive to ensure that a positive approach is taken towards the delivery of the allocation. These discussions have been informed with ongoing dialogue with other key stakeholders to ensure all issues have been addressed.

3B.24 The Council is working with the Site Promoters and landowners of the North Lancaster Strategic Site in the preparation of Statement of Common Ground (SOCG). The Statement provides details on the current position of both the Council and site promoters in relation to a number of key planning matters and an indication of how the site can be delivered in the future. The Statement will be finalised and provided to the Inspector prior to the commencement of the Examination.

#### South Carnforth

3B.25 The delivery of approximately 700 dwellings across two sites in South Carnforth (SG11 – Lundsfield Quarry and SG12 – Land South of Windermere Road) make an important contribution towards housing delivery in the plan period. This is in the context of the OAN and the changes in delivery that have been described through the responses to Matter 2 which relates to housing. The delivery of strategic sites through the plan period and the consistent rates of housing delivery they can provide over time is a significant part of the housing trajectory.

- Level 1 Strategic Flood Risk Assessment (JBA 2017) **(En\_SFRA\_01)**
- Level 2 Strategic Flood Risk Assessment (JBA 2018) **(En\_SFRA\_02)**
- North Lancashire Green Belt Review (Lancaster CC) **(EN\_GBR\_01.1)**
- Landscape, Townscape & Visual Field Summary Report (Arcadis 2018) **(En\_LA\_03)**
- Identified Sites Landscape and Visual Assessment (Arcadis 2018) **(En\_LA\_05)**
- Preliminary Ecological Appraisal, South Carnforth) (Greater Manchester Ecology Unit 2016) **(En\_ES\_07)**
- Preliminary Desk Top Ecological Assessments – Potential Housing Sites (Greater Manchester Ecology Unit 2017) **(En\_ES\_09)**

- Wintering Bird Surveys of Sites under consideration for future development (Greater Manchester Ecology Unit 2017) **(EnES\_15)**
- Lancaster District Housing Sites – Initial Desktop Archaeological Assessment **(En\_AA\_05)**
- Heritage Impact Assessment for Sites (Lancaster CC 2018) **(En\_He\_05)**
- South Carnforth Geo-Environmental Desk Study Assessment (JBA 2018) **(Ge\_03)**
- Local Plan Transport Assessment Part 1 (WYG) **(Tr\_02)**
- Local Plan Transport Assessment Part 2 (WYG) **(Tr\_03)**
- Local Plan Viability Assessment Stage 1 (Lambert Smith Hampton) **(VI\_01)**
- Local Plan Viability Assessment Stage 2 (Lambert Smith Hampton) **(VI\_02)**
- Infrastructure Delivery Schedule (Lancaster CC) **(VI\_03)**

3B.26 The evidence described above provides the Council with the confidence that the allocation made for NLSS is sustainable and sufficiently justified. Further to the evidence base work that has been undertaken by the Council on this matter, the Sustainability Appraisal process **(SD\_003 & SD\_004)** has thoroughly investigated the sustainability implications of the proposed allocation and has informed the preparation of the detailed policy.

3B.27 Throughout the plan process the Council has sought to engage with the site promoters and landowners for the site to ensure that issues relating to the suitability and delivery of the site are fully understood by all parties and investigated if required. Discussions over the delivery have been proactive and constructive to ensure that a positive approach is taken towards the delivery of the allocation. These discussions have been informed with ongoing dialogue with other key stakeholders to ensure all issues have been addressed.

**NB Policy SG4 (Lancaster City Centre), Policy SG5 (Canal Corridor North, Central Lancashire), Policy SG14 (Port of Heysham) and Policy SG15 (Heysham Gateway) are dealt with below under the discreet issues of built heritage and transport (SG4), retail impact (SG5) and natural heritage (SG14 and SG15).**