



Morecambe Town Council
Morecambe Town Hall
Marine Road
Morecambe
LA4 5AF.

Contact: David Croxall
Telephone: 01524 422929
Email: clerk@morecambe.gov.uk
Our Ref:
Your Ref:

Kim Russell,
Programme Officer
6 Laurel Gardens,
Kendal,
Cumbria
LA9 6FE

1st April 2019

Dear Kim,

Lancaster District Local Plan - Statement supporting Morecambe Town Council's appearance at the Local Plan inquiry

Policy EN 6 – North Lancashire Green Belt - Proposal re Land to East of Torrisholme

Morecambe Town Council believes that the proposal within the Lancaster District Local Plan to move parcels of land 06 and 07 out of Green Belt is fundamentally unsound and that it will weaken the protection enjoyed by that land under the terms of the National Planning Policy Framework (NPPF). The reasons for THE Town Council's objections are set out below.

The NPPF makes clear that Green Belt Boundaries, once set should only be moved through exceptional circumstances. The NPPF does not directly define what may constitute exceptional circumstances but all references within any other document which deals with the redefining of Green Belt boundaries do so only in the context of freeing up land for the purposes of development within the context of the preparation of a new Local Plan. Indeed, it is difficult to imagine any other reason which might constitute an exceptional circumstance.

The parcels of Green Belt labelled 06 and 07 are not designated as development land and no other exceptional circumstance is defined within the emerging plan. Without an exceptional circumstance there can be no reason to move the Green Belt Boundary and the NPPF makes clear that the boundary should not be moved.

Although Para 22.31 clearly states that the changes to Green Belt do not directly result from the Green Belt review, it cannot be denied that the findings of the review have informed all the changes proposed in the submission plan. The wholesale incorporation of these changes brings the plan into conflict with the NPPF which clearly states that exceptional circumstances are required for boundaries to be changed. The need for the strength of boundaries to be **assessed should only apply when boundaries are to be moved**. If there are no exceptional circumstances the boundary should not be moved, and the current boundary should stand. The Town Council therefore believes the decision to be unsound.

This unsound decision will have the effect of weakening the protection against development which is enjoyed by Green Belt. This weakening effect is already being felt as developers are already preparing plans for development of this particular parcel of land.

The proposed move of the Green Belt Boundary will enable the very urban sprawl against which Green Belt is intended to afford protection.

The Green Belt review was undertaken in the light of the infrastructure changes which have taken place within the local district and which have inevitably affected the North Lancashire Green Belt. Whilst this is ostensibly a sound reason to carry out a review it is not a reason to review the whole of the Green Belt outside the occasion of the preparation of a Local Plan. Indeed, the eminently practical method of dividing the Green Belt into parcels of land should facilitate the business of assessing land affected by infrastructure change, land required for development and land which falls outside those two definitions.

Land which falls outside the need for change to be considered should remain unchanged in accordance with the NPPF. This is especially the case where the proposed change has only one real effect that of weakening protection against urban sprawl as in the case of parcels 06 and 07. The strenuous representation 135/04/EN7/US1-4/LC made on behalf of Oakmere Homes indicates the firm intention of developers to pursue an application to develop on the land in question and underlines the danger of reducing the protection afforded to the land as Green Belt.

I trust these comments will be considered along with the Council's original objection by the City Council and the Planning Inspector during the Examination of the Local Plan on Thursday 11th April.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'David Croxall', written in a cursive style.

David Croxall
Town Clerk



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Mr A. Dobson,
Head of Regeneration and Policy,
Lancaster City Council,
Town Hall
Morecambe,
LA4 5AF

29th March, 2017

Dear Mr Dobson,

Draft Local Plan for the Lancaster District

The Town Council has recently considered the consultation regarding the proposed Draft Local Plan for the Lancaster District and agreed to make the following comments:

- (a) That in respect of policy TC2 regarding Town Centre designations, the City Council be requested to designate a Primary Shopping area (PSA) however large within Morecambe centre despite the fragmented central areas of the town on the basis that this would provide a clear central area that the proposed Morecambe Neighbourhood Plan can work alongside in its policy preparation. This would also help to prevent the town centre from potentially encroaching on other areas of the town that in the future may not be appropriate to be considered as part of the PSA or as retail frontages;
- (b) That in respect of policy DOS9 regarding the Morecambe Festival Market and surrounding area, the Town Council remains concerned that this proposed policy would potentially reduce car parking options further in the town, at a time when the projected number of visitors to the town could increase due to the opening of the Bay Gateway. The Draft Local Plan should be seeking to increase and enhance car parking provision in Morecambe as opposed to reducing the number of spaces to ensure there remains enough appropriate parking for residents and visitors;
- (c) That the proposal to redesignate land to the south of Hasty Brow Lane, east of Russell Drive, Torrisholme and north of the Bay Gateway and west of the West Coast Main Line from Green Belt space to Open Countryside be resisted. The Town Council remains of the view that this area of land should remain designated as Green Belt on the basis that this area of land formed the most appropriate boundary between the developed area of the town and open countryside, and to protect it from future development.

The Town Council understands that the proposed redesignation does not give consent to development although is concerned that it would weaken the protection status to this area of land in the long term. This area of land is not appropriate for development given the following:

- This is an inappropriate area for housing as the land is of poor quality being enclosed down its eastern and southern sides by the elevated West Coast Main Railway Line and the Bay Gateway respectively;
- The land is inappropriate environmentally as it is prone to flooding and would isolate Torrisholme Barrow which would be harmful to wildlife; and
- The road access is inadequate given the enclosed boundaries down the eastern and southern sides and would only allow estate type roads to be constructed which would not be sufficient for the servicing of future housing developments.

Furthermore, the Draft Plan proposes adequate development opportunity sites to meet the projected housing requirement in the whole City Council area up to 2031. Therefore, there is no requirement to inadvertently create other housing development sites by such a redesignation.

I trust these comments will be considered by the City Council's Planning Committee in due course.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'David Croxall', written in a cursive style.

David Croxall
Town Clerk



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Regeneration and Planning, Planning and Housing Policy Team,
Lancaster City Council,
Town Hall
Morecambe,
LA4 5AF

13th February 2019

Dear Sir/Madam,

Lancaster District Local Plan consultation on additional evidence and information

Policy EN 6 – North Lancashire Green Belt - Proposal re Land to East of Torrisholme

The proposed Local Plan states:

"The Green Belt boundary to the east of Torrisholme has been amended to provide a more definable Green Belt boundary making use of the West Coast Mainline. This provided a more robust and permanent boundary that will not be vulnerable to future encroachment. The land that has been removed from the Green Belt will not be identified for development purposes but will be identified as open countryside. The land at Torrisholme Barrow will be protected as an area of open space and as a Scheduled Ancient Monument due to its recreational and historical importance "

Paragraph 133 of the National Planning Policy Framework states unequivocally *"The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."*

Paragraph 134a of the National Policy Planning Policy Framework lists as the first of five purposes of Green Belt *"to check the unrestricted sprawl of large built up areas;"*

Paragraph 134c gives the third purpose as *"to assist in safeguarding the countryside from encroachment."*

Paragraph 136 is clear that *"Green Belt Boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans"*

Lancaster City Council has taken the fact of preparation of a new Plan as providing an exceptional circumstance in itself but as can clearly be seen, Paragraph 136 goes on to indicate that the need for change should be established through strategic policies. Since there is no intention to incorporate the land released from Green Belt into any strategic land use the need for change is not established.

Paragraph 137 refers to the need for the strategic policy making authority to indicate that all other reasonable options for development have been considered and the supporting sub paragraphs a, b and c clarify and underpin the need for such assessment.

It is the view of the Town Council that the NPPF clearly intends that exceptional circumstances envisaged in the Framework relate to the removal of Green Belt protection from development.

The City Council gives as its only justification for moving the Boundary of the Green Belt the opinion that a railway line exists as a more permanent feature and thus could serve as a more permanent boundary.

It is the view of the Morecambe Town Council that the existing Town Boundary serves as a more appropriate boundary to the Green Belt and that it is no less permanent than the railway line which could, at some future period, be removed, however unlikely that may seem at the present time. The moving of a railway line lies not under the control of a Local Authority but under the control of the organisation which owns the line. The boundary of a town, village or even a city cannot be moved on the mere whim of a commercial or private interest. It is therefore clear to the Morecambe Town Council that the existing boundary will always serve as a greater safeguard against "encroachment and unrestricted sprawl" than a railway line with no guaranteed degree of permanence, and permanence is clearly laid down as a required feature of a Green Belt Boundary.

Whilst the Town Council does welcome the findings in the Key Urban Landscapes Review to retain Torrisholme Barrow as a Key Urban Landscape and protect it from future development given its historical importance and an important area of local amenity, it concludes that there is no new evidence to support Policy EN6 within the proposed Local Plan for the change of designation of land to the east of Torrisholme from Green Belt to Countryside and therefore that this part of the proposed Lancaster District Local Plan is not sound.

I trust these comments will be considered by the City Council and the Planning Inspector during the Examination of the Local Plan.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'David Croxall', written in a cursive style.

David Croxall
Town Clerk