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27118/A3/DM/ss

2 April 2019

Dear Kim,

**RE: LANCASTER DISTRICT LOCAL PLAN EXAMINATION HEARING STATEMENTS**

On behalf of Story Homes (Representor ID: 106), please find enclosed three copies of our Hearing Statements in response to Matters 2, 3 and 5 of the Inspector's Matters, Issues and Questions for the Lancaster District Local Plan Examination.

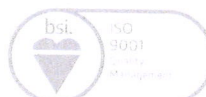
If you require any further information, please do not hesitate to get in touch.

Yours sincerely



**DAN MITCHELL**  
Partner

Encls. Hearing Statements



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**Barton Willmore on behalf of Story Homes  
Examination into the Lancaster District Local Plan**

**Matter 2**

**Representor ID: 106**

**Matter 2 - Housing**

**Main Issue: Whether the Council's strategy for meeting its housing requirement is sound?**

Commentary from Story Homes

1. Prior to setting out our client's response to the Inspector's questions as below, it is noted that the Council has produced a series of lengthy Examination Statements that have been uploaded to the Examination Library, as per the e mail from the Programmed Officer dated 25th March 2019, received at 12:20pm. These Statements contain new evidence not previously available (please refer to LCC7.2.0 Matter 2). This includes new evidence on supply, suggested proposed changes to the Plan, a new housing trajectory and the Council also appears to be proposing a new supply led housing requirement. We refer to paragraph 2F.11 which states:

***"In view of the above assessment and having regard to a 20-year plan period 2011/12 to 2030/31 the Council would propose a reduced supply led housing requirement for the district that is equivalent to 510 dwellings per annum, equivalent to 10,200 dwellings over the plan period."***

2. It is unclear from the Examination process how this is to be treated and whether respondents have an opportunity to fully consider the implications of this new information. Clearly if the Council is now proposing changes to the submitted Housing requirement and if this new information is to be considered by the Examination, then it must be subject to public consultation.

*a) The identified objectively-assessed need (OAN) for housing for the area is 14,000 new dwellings (an average of 700 per year). The Council, as set out in policy SP6, identifies a requirement of 12,000 new dwellings at a rate of 522 per year. Is the Council's housing requirement soundly based and supported by robust and credible evidence? Does it take appropriate account of the 2012-based DCLG Household Projections, the likelihood of past trends in migration and household formation continuing in the future, and 'market signals'? Is the housing requirement appropriately aligned with forecasts for jobs growth? What implications should be drawn from paragraphs 7.9 – 7.13 of the Updated Consultation Statement February 2019, on the OAN figure.*

### Objectively assessed needs

3. Since commencement of the Plan preparation in 2013, the Council has commissioned various consultants to help it provide a robust assessment of the objectively assessed housing needs (OAN) for Lancaster district. Several reports have been prepared which comprise the evidence base and the Council has helpfully hosted multiple Local Plan update presentations at its Developers' Forum to clarify its strategy. At all times, the Council outlined its intention for employment-led growth, noting regularly that it is evidenced that Lancaster has a resilient economy with various economic developments projects advancing. Turley, Edge Analytics and Arc 4 have all previously been commissioned to provide a robust assessment of and advise the Council about housing (and employment) needs.
4. The Council's 2018 OAN verification report (Ho\_SHMA\_04) provided a review of the 2015 Independent Housing Requirements Study (IHRS) produced by Turley, which concluded that there was an evidence-based need for between 553 and 763 dwellings per annum in Lancaster District, with a narrower OAN range of between 650 and 700 dwellings per annum being recommended by Turley.
5. The verification report tested the latest evidence and most up to date datasets but did not specifically provide an updated OAN figure. Instead, the report ratifies previous work and draws several highly relevant conclusions:
  - 8.22 .....growth in the economy will generate a higher need for housing than suggested by a continuation of long-term demographic trends in Lancaster District, indicating that an adjustment to the OAN remains appropriate and necessary in the context of the PPG methodology.
  - 8.38 The latest evidence indicates that supporting likely job growth, accommodating projected demographic growth and responding to market signals is expected to generate a need for at least 605 dwellings per annum in Lancaster District over the plan period (2011 – 2031). A higher need for around 620 dwellings per annum would, however, be generated by the slightly higher levels of job growth associated with the Baseline+ scenario developed in the RELP. Consideration of the latest baseline economic forecasts strongly indicates that needs are more likely to be aligned with this more positive employment forecast, and a further interrogation of the additionality of specific development projects may indeed elevate the associated housing needs slightly further.
  - 8.39 This verification study has not sought to arrive at a concluded updated OAN. However, the analysis presented strongly indicates that the need for housing in

Lancaster District continues to fall within the wider range of projected housing need established through the IHRS, suggesting general consistency between its findings and the updated modelling and analysis presented herein.

- 8.40 The narrower range of 650 to 700 homes per annum can also be considered to remain broadly reasonable, particularly given the recognised uncertainties associated with forecasting future job growth and labour force behavior. In the context of potential changes to Government guidance and new data releases, the lowering in the scale of housing growth needed to support this job growth is not considered to justify a departure from the previously concluded OAN used to inform the emerging Local Plan. The retention of this range provides – in the absence of a full updated review of likely employment growth in Lancaster District – a degree of flexibility in supporting the local economy.

6. The findings of the verification report are such that the IHRS is considered relevant and up to date.
7. Paragraphs 9.9 and 9.10 of the Local Plan states that in February 2016, the Council formally decided that the Turley recommendation of the OAN (of 650-700 dwellings per annum) had established the evidence upon which the Local Plan should be prepared, and, that that decision followed a period of much challenge and reflection.
8. It is noted that the Council has also accepted the findings of the verification report as above. No new OAN evidence exists that would suggest a lower OAN than the 650-700 set out in the original report.
9. Despite this evidence, paragraph 9.19 of the Local Plan clearly states that the Council has followed a difference approach, choosing to advance a strategy to deliver 12,000 homes (600 per year) instead of the full OAN of 13,000-14,000 (650-700 per year). There is limited explanation as to why the 2,000 homes difference is justifiable, other than the Council's commentary that the district is constrained. We address this below. However, it is noted that the Council appears to have selected its sites and predetermined what it refers to as its 'realistic supply,' adjusting the housing requirement accordingly. This point is also supported by the very recent Council Matter 2 statement which further seeks to adjust the housing requirement down on grounds of supply (this time to 510 dpa).
10. Furthermore, under Policy SP6 the Council advances a highly unusual adjustment, adjusting the plan period for delivery, yet failing to match this with an adjustment to the housing requirement. This has the net affect of artificially reducing the annual requirement to 522

dwelling per annum as stated in the Policy. There is no justification for this approach. The period for housing needs must match the period for delivery.

11. We note that in our client's Publication Draft submissions, we have suggested that the plan period should be rolled forward to 2034, with both the requirement and delivery periods adjusted accordingly. This is to ensure that there is at least 15 years post adaption of the Local Plan (it is already 8 years into this 20-year plan period). This would lead to an adjusted OAN of 675 (Turley 650-700 dpa midpoint) x 23 years = 15,525 dwellings.
12. Paragraph 7.12 of the Updated Consultation Statement (February 2019) states that the verification work has been able to take account of changes to the demographic projections, economic growth and changes to Government policy. Yet paragraph 7.13 appears to draw a conclusion that the OAN has reduced. This is not the case. The verification report clearly confirms that the IHRS work is robust and therefore the OAN narrow range of 650-700 dpa still applies.

*b) Are the constraints identified by the Council sufficient justification for not meeting the full OAN for housing in the District?*

13. No. Paragraphs 9.12-9.18 of the Local Plan paint the picture that the Council has undertaken an extensive and exhaustive process of assessment that culminated in no alternative options but to advance a lower housing requirement. This is incorrect. It has instead, selected sites and then sought to justify a housing requirement on the basis of this capacity.
14. Whilst there are several designated areas of constraint in the district, very limited evidence is provided as to the alternative scenarios considered, including further Green Belt releases or other settlement extensions. The housing requirement of 522 dwellings per year as set out in Policy SP6, being based on an argument of constraint, is therefore not soundly based.
15. The Council's Background Paper on Assessing Reasonable Alternatives (P\_012) is a note on the stages the Council has undertaken. It is not evidence on the environmental capacity of the district to accommodate full housing needs.
16. Appendix A of P\_012 includes a useful list of other sites considered. Many of these sites have been dismissed as not fulfilling an opportunity for allocation on grounds of process rather than constraint. Reasons given including 'being considered by a Neighborhood Plan' or 'lying within the AAP area'. These are not environmental constraints that would prevent the Council from allocating such land now.

17. Our client would also draw attention to the Pre-Publication document prepared at the Regulation 18 stage (LCC ref: PP\_001). This document proposed to allocate additional sites that were subsequently 'dropped' by the Council without justification.
18. As examples, Policy H7 of that draft Plan sought to allocate 140 dwellings at land at Ashton Road, Lancaster and Policy H9 sought to allocate land at Fleet Lane, Hornby (which also lies within the AONB). Both sites are being promoted by Story Homes and there is no evidence provided by the Council that these allocations would be detrimental to wider policy or environmental constraints. We refer to the Inspector to our Publication draft evidence of each of these sites which included relevant technical information and indicative layouts.
19. Additionally, our client would refer to its proposed omission site at Manor Lane, Slyne, which lies in the Green Belt. This site has no environmental or physical constraints and doesn't performs well in respect of the purposes of including land in the Green Belt. Yet the Council elected not to seek release of this land, which we understand stemmed solely from local opposition and Member intervention, and, the dismissal of a much larger parcel land of Green Belt. In the context of the Council needing to explore every possible opportunity to find enough land, the Green Belt review has failed to consider the development potential of smaller parcels.

*c) What provision has the Council made for any unmet housing need and does the housing requirement take appropriate account of the need to ensure that the identified requirement for affordable housing is delivered?*

20. The Council's strategy seeks to only deliver around 522 homes per annum in the plan period, which is 10,440 dwellings. The OAN is 13,000-14,000 over the plan period. A significant amount of the overall needs are therefore not proposed to be met in the plan period.
21. Whilst the Plan does extend the delivery period to 12,056 homes by 2033/34, there is no corresponding adjustment of housing requirements during the 3 years at the end of the plan period.
22. Extrapolating the Council's OAN forward by 3 years would give an OAN of 15,525 dwellings as noted in our response to question a) above. If the Council can only deliver a maximum of 12,056 homes over the same period to 2033/34, it could fall short of achieving the full OAN with an unmet need of 3,469 homes (representing 22% of the full OAN).
23. It is unclear in the Council's evidence as to the extent of discussions between Lancaster and its neighboring authorities as to accommodating the unmet needs. Wyre, Ribble Valley and South Lakeland Councils all have adopted Local Plans with strategies based upon meeting

their own needs only. There appears to be very limited opportunities for assistance to be provided to Lancaster from adjoining local authorities.

24. The SHMA indicates an annual affordable requirement of some 376 homes per annum across Lancaster district. According to the Council's Examination Statement, the affordable homes delivery rate is approximately 101 affordable net dwellings annually between the years 2011/2012 and 2017/2018. There is a clear case for an upward adjustment of housing requirements based upon the affordable requirements alone.
25. The Local Plan is not effective or justified in this regard as the Council has sought to undertake the opposite approach, seeking to suppress housing requirements via its arguments of constraint and apply them over a longer delivery period. The evidence suggests that Section 106 remains the core strategy to delivery more affordable homes. Further, the more recent upsurge in market activity has resulted in the most affordable homes being delivery in Lancaster district in many years (148 affordable completions in 2017/18).
26. As set out above, there is very limited evidence to support the assertion that Lancaster district is constrained to the point of being unable to meet its full OAN. There appears to be limited evidence that considers the implications of not meeting the full OAN on the delivery of affordable homes in Lancaster.

*d) Is the Housing Market Area (HMA) agreed with adjoining authorities in line with the Planning Practice Guidance and does the plan period coincide with housing projections?*

27. Please refer to comments under question c) above. The general approach taken in this part of the North West is that the housing markets in each authority's administration are self-contained. This is also the approach of Lancaster and evidenced in the SHMA.

*e) Are the DPDs clear as to the identified need for additional pitches for gypsies and travellers (policies SP6 and DM9) and is the identified need soundly based and supported by robust and credible evidence?*

28. No comments from Story Homes.

*f) Is the amount of land allocated for housing sufficient to meet the requirement and how will it ensure delivery of the appropriate type of housing where it is required within the District (with particular reference to Policies SP2, SG1, SG7, SG9, H1, H2, H3, H4, H5, H6, DOS7, DM1, DM2, DM4, DM7, DM8, DM11 and DM12)?*



29. No. In its Matter 2 statement (LCC7.2.0 Matter 2) that has recently been added to the Examination website, the Council has produced a range of new information regarding supply, including an evidence document entitled 'The Council's Approach to Delivering Housing Supply in Lancaster District' (February 2019). This is appended to the Council's Matter 2 Statement and has not previously been in the public domain or subject to any consultation.
30. The paper appears to present a housing supply position for the district as of the 31st December 2018, updating that submitted to the Inspector and Examination previously. It also proposed changes to the Local Plan which is unhelpful at this stage.
31. Paragraphs 2F.9-2F.13 of the Council's Statement states that there is not enough land to meet the proposed adjusted housing requirement of 522 as set out in Policy SP6. A revised Table is provided at paragraph 2F.11 (proposing to replace that on page 37 of the Local Plan) which suggests the supply is now reduced from 12,056 dwellings to 10,564.
32. Paragraph 2F.11 also states:
- 2F.11 In view of the above assessment and having regard to a 20 year plan period 2011/12 to 2030/31 the Council would propose a reduced supply led housing requirement for the district that is equivalent to 510 dwellings per annum, equivalent to 10,200 dwellings over the plan period. The Council would continue to propose to roll this figure over for three additional years to meet the NPPF requirement to plan for 15 years.***
33. This appears to be a very late proposal by the Council to advance a yet lower housing requirement based upon its supply led argument.
34. Clearly and in response to the Inspector's question, the Council is not proposing sufficient land to meet the housing requirement as set out in the Plan.
35. Paragraphs 2F.15-2F.29 also provide a update to the Council's supply position on Strategic Sites, Urban Area Sites (Policy H1 sites) and Rural Area sites (Policy H2 sites). It has not been possible to further consider the implications of the revised supply assessments, given the time constraint between when this information has been made available and in preparing this statement. However, it is noted that the Council has reduced its anticipated delivery in 2033/34 from the Strategic Sites (Table 2F.1), which also extends beyond the plan period.
36. The Council's position on the capacity from sites with permission has also reduced.
37. The above evidence reaffirms our client's position that there is an acute need to release further land for development in Lancaster, which includes additional sites and early delivery of strategic land at Bailrigg Garden Village.



*g) Will the distribution, capacity and speed of deliverability (with regard to viability and infrastructure) of the sites, satisfy the provision of a 5-year housing land supply?*

38. No. The Council states at 2G.28 of its Statement:

***2G.28 The above calculations confirm that despite substantial effort to identify a deliverable supply the council is unable to demonstrate a 5 year housing land supply.***

39. The above evidence reaffirms our client's position that there is an acute need to release further land for development in Lancaster.

*h) Do the DPDs make provision for addressing inclusive design and accessible environments issues in accordance with the NPPF?*

40. No comments from Story Homes.

*i) Is the proposed monitoring likely to be adequate and what steps will be taken if sites do not come forward?*

41. The Council has a good process to monitor housing delivery completion and has helpfully prepared several land monitor reports and an Annual Monitoring report. It has also been proactive in tracking the progress of existing allocations and completion rates on sites with permission. This is useful in understanding the progress being made.

42. A housing trajectory is also provided, and this is proposed to be included in Appendix e of the Local Plan. We would support that provision.

43. What is not clear is the intended "Monitoring Framework" as set out in Chapter 25 of the Local Plan and what the measures would be should housing delivery fall below expected levels. The Local Plan should specify the Monitoring Framework in full in the appendices to the Local Plan.

*j) How will the housing allocations in the DPDs deliver the affordable housing set out in policies DM3 and DM6? What is the likely effect of DM6 on viability?*

44. The more recent work on viability undertaken by Lambert Smith Hampton (LSH) provides a general overview of headline viability assessments. This was not available to the council

during the policy formulation stages and assessment of each site. It followed on after the Local Plan has been Published.

45. The LSH assessment are a useful indicator of viability. However, the assessments appear to have been undertaken with a scheme in mind or detailed information on the costs of infrastructure. Noticeably information regarding the County Council's education strategy was not factored in and the council's open space strategy and provisions has only recently been completed. The assessments must therefore be treated as broad brush at this stage.

*k) How do the DPDs sit with the aim of the NPPF to create sustainable, inclusive and mixed communities (Policy SP9)?*

46. No comments from Story Homes.

*l) Are policies EN6 Strategic Policies & Land Allocations DPD and DM49 of the Development Management DPD on the Green Belt consistent with the NPPF?*

47. We refer to our Publication Draft submissions and do not make further comment here.

*m) Could the Council provide clarification on the amount of housing to be provided within individual neighbourhood plans (Policies SC1 and DM54)?*

48. We refer to our Publication Draft submissions and consider that the Council has over-estimated the contribution from Neighbourhood Plans. In those submissions, we provided an assessment of progress of each of the Neighbourhood Plans. With the exception of Halton with Aughton NP, which benefitted from the inclusion of several planning permissions in its figures, very few other Neighbourhood Plans are making any significant contribution to supply. The Council has provided a figure for the overall anticipated contribution from Neighbourhood Plans.

**Barton Willmore on behalf of Story Homes  
Examination into the Lancaster District Local Plan**

**Matter 3**

**Representor ID: 106**

**Matter 3: Spatial Strategy**

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

*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?*

Spatial approach & settlement hierarchy

1. In broad terms, Story Homes is supportive of the general spatial approach to development. However, there are elements of Policies SP1, SP2, SP3 and SP6 that are unsound as outlined below. We also note our objections to Policy SP6 as per our Matter 2 statement.
2. We do not comment on Policies SP4 and SP5 which deal with economic growth, however, we note and support the various economic growth initiatives listed under SP4 as priorities of the Council, and paragraph 8.3 of the Local Plan which notes that economic growth is a priority of the Council's Corporate Plan.

Policy SP2

3. In relation to Policy SP2 and the third tier in the settlement hierarchy, the Council draws distinction between those sustainable rural settlements within the AONBs and those outside of the AONBs. No such distinction is drawn for other constraints such as Green Belt which affects other sustainable rural settlements. SP2 is unsound on this basis.
4. Criterion 3 of Policy SP2 already contains provisions to consider growth in AONB areas based on landscape capacity and the NPPF sets out the national positions. As such, the focus attached to AONBs by splitting the tier 3 settlements is therefore disproportionate and unnecessary. Tier 3 should be grouped together because the Council considers all those locations listed to comprise sustainable rural settlements.

Policy SP3

5. Policy SP3 is generally supported as an overarching approach. Our client agrees with the recognition in the second paragraph that a range of strategic greenfield land is required to meet future development needs. However, this is specifically referenced as being relevant to Lancaster and Carnforth only and the Policy is unsound on this basis.
6. As Policy SP2 confirms, rural settlements are a focus for growth and are sustainable settlements. Greenfield sites on the edge of the rural settlements can be delivered in a sustainable way, with some sites being proposed for allocation by the Council or already benefitting from permission. Policy SP3 is unsound and should be modified to reflect the contribution and opportunity that greenfield sites in the sustainable rural settlements present.
7. This point is of general concern given the unmet housing needs overall. The Council appears to have taken a blanket approach, ignoring the potential development capacity of the sustainable rural settlements. In doing so, it has also failed to properly consider the needs of such settlements where development could have a positive benefit.
8. In reference to our client's submissions, its proposed site at Fleet Lane, Hornby was omitted from the Publication Draft plan, despite it being included at the Preferred Options stage (PP\_001 Site reference Policy H9). The status of the site did not change and there was no further evidence provided by the Council as to the reason for this change.
9. Similarly, the Council has not properly considered the potential of smaller scale Green Belt releases in its sustainable rural settlements, such as Slyne-with-Hest. We understand this was a largely political move rather than any evidence-based assessment, because Slyne-with-Hest benefits from a very good range of local services and public transport connectivity and the land performing a relatively poor Green Belt function. Our client's omission site at Manor Lane, Slyne performed poorly in respect of its contribution towards the all five purposes of including land within the Green Belt; it is encircled on three sides by development, and the release of the land would not harm the overarching purposes of the North Lancashire Green Belt. It is therefore a logical candidate site for release now.
10. We note that at the Publication Draft stage, our client submitted detailed and site-specific representations for its controlled land at both Slyne and Hornby, which will be before the Inspector. In the case of Slyne, that evidence included an assessment of the Green Belt and critique of the Council's Green Belt study. In the case of Hornby, the evidence included a landscape capacity assessment. The evidence is not repeated hear, but we wish to the draw the Inspector's attention to those site position statements.

11. It is Story Homes position that the Council's assessment of development potential at the sustainable rural settlements is wrong. It is based on a blanket review, the emphasis being to avoid releasing land rather than facilitating development. This is surprising given the overarching and acute need to find more sites for development in the district. In the case of Hornby, this is even more surprising given that the site was proposed for allocation at the Preferred Options stage, the Council presumably being confident at that point that there was no wider impact on the AONB. The characteristics of the site or AONB have not changed.
12. These two omission sites represent logical and sustainable development solutions in sustainable locations. Given the Council is not intending to meet its own housing requirement, there is a clear case to allocate these sites now.

Policy SP6, Distribution & Sustainable Rural Settlements

13. In relation to Policy SP6, the Council's Matter 2 Examination Statement has now sought to amend many of the anticipated supply figures for individual sites, introducing new site assessments. This reduces the supply overall based upon the Council's new and updated evidence. As per our comments in our Matter 2 statement, the Council now appears to be advancing a position where the overall supply does not meet its own requirements, and there would be no 5-year supply at the point of adoption of the Plan.
14. Cross referencing the settlement hierarchy at SP2, the Council does not provide an apportionment of housing distribution per settlement or category of settlement. Instead, Policy SP6, H1 and H2 collectively set out the strategic and non-strategic site-specific delivery. Student accommodation is also listed as a component of the supply. This makes the understanding of the overall distribution and relationship with the settlement hierarchy difficult to interpret.
15. Whilst Lancaster appears to get most of the development, Morecombe and Heysham appear to benefit from very limited development despite being second tier. The apportionment of housing is not explained. The Council's approach to distribution is therefore extremely difficult to monitor.
16. Outside of the urban areas, our Client considers that the Council's approach to the distribution of development to be even more unclear and a departure from planning objectives and the Policy SP2 strategy.
17. It is, for example, unclear whether the role of each settlement set out in Policy SP2's spatial approach is achieved by the right amount of housing development. Policy SP2 states that the Sustainable Rural Settlements should be a 'focus of growth'. This focus for growth is not

defined and as we note below, very few of these Sustainable Rural Settlements actually have any 'growth' attributed to them because no sites are allocated.

18. Further complicating the picture is the inevitable changing status of sites in the planning process. As the Local Plan is reliant on specific sites to meet the spatial strategy rather than a distribution of development apportioned between settlements, this means that it is challenging to monitor whether the spatial approach is being achieved. The approach provides no certainty or flexibility and if a site fails, there is no other distribution policy mechanism that could be used to justify other land. It would simply mean that a particular settlement did not achieve the spatial strategy intentions of growth because the spatial strategy is not robust enough.
19. Policy H2 of the Local Plan allocates land for 1,024 dwellings across the rural area. Further scope is provided for development in Neighbourhood Plan areas although the anticipated contribution is not defined. However, of the sites listed in Policy H2, only 91 dwellings do not benefit from planning consent.
20. On a settlement by settlement basis, the distribution of this growth within the rural area as set within Policy H2 is inconsistent. 236 dwellings are to be delivered in Halton, whereas there are only 23 dwellings at Hornby and no sites identified at Slyne-with-Hest. To amplify this point, despite also being identified as a sustainable settlement in Policy SP2, Hornby will receive 90% less development in the plan period than Halton, with Slyne-with-Hest receiving none. In our client's view this does not provide for a sustainable pattern of development amongst the District's rural settlements, categorised by the Council as sustainable locations.
21. There is a lack of evidence to support the approach set out by the Council in rural areas. Supporting Background Papers and evidence documents are silent or out-of-date in examining actual rural housing needs. Whilst evidence is provided examining the sustainability of settlements, no evidence is provided in examining how completed, committed and allocated housing will respond to the housing needs of the existing and future population and whether this is enough to support the vitality and vibrancy of rural services, in the context of NPPF. As such it is difficult to understand whether the Local Plan is effective in meeting rural development needs in line with Council objectives.
22. Beyond this, no readily available breakdown of completions and commitments is provided on a settlement by settlement basis. As such it is unclear whether allocations set out under Policy H2 are sufficient to meet the needs of these settlements further to the commitments made. It cannot therefore be concluded whether the plan delivers the spatial strategy for the Sustainable Rural Settlements which are a 'focus for growth'.

23. It is Story Homes' contention that to make the spatial strategy sound, the Council should seek to identify a specific housing requirement for each of its sustainable rural settlements as a proportion of the overall housing requirement. Sites need to be allocated in each settlement to achieve a degree of growth.

*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?*

24. Story Homes controls substantial land within the Bailrigg Garden Village (BGV) broad area of growth. As such, Story Homes generally supports Policies SG1, SG2, SG3 and TC1 (Bailrigg Garden Village), noting that it does not wish to make submissions on the other strategic sites noted in the Inspector's question.
25. Story Homes' controlled land within the BGV broad area of search falls into two distinctive parcels. Land at Ashton Road is located to the west of the Lancaster canal. This is separate to Story Homes' land at south of Burrow Heights Farm, which is located between south Lancaster, Galgate and to the west of the A6. This parcel is a significant proportion of the BGV area of search extending from Burrow Heights Farm towards Galgate and is identified in the early spatial options as a central development area of the BGV.

#### Land at Ashton Road

26. It is Story Homes' position that land at Ashton Road does not need to be considered as part of the wider BGV AAP. It is self-contained and should be allocated for development now.
27. Indeed, this was the position in the Consultation Draft Local Plan (January 2017 – reference PP\_001), which allocated the site for 140 dwellings under Policy H7. The Council effectively changed its mind over the allocation of this site between the Preferred Options and Publication Draft stages.
28. Given that it is the Council's position that it cannot currently demonstrate a 5-year supply of land, and, that it does not have enough sites to meet the overall housing requirements in the plan period, Ashton Road should be released for development now.
29. Land at Ashton Road is in one of the most sustainable locations in Lancaster. It is well served by public transport, pedestrian and cycling connectivity and benefits from access to the



Lancaster canal recreation route. This provides opportunities for modal shift in line with the Council's wider South Lancaster aspirations.

30. We refer the Inspector to our submissions made on Ashton Road to the Publication Draft. This is an obvious candidate for allocation now and does not need to be brought forward as part of BGV as it is not dependent on HIF infrastructure.

#### Burrow Heights Farm & south to Galgate - Bailrigg Garden Village

31. Story Homes control a significant proportion of the BGV area of search, extending from Burrow Height Farm to Galgate. Appended to this Statement is a plan showing the extent of land controlled (Appendix 1).
32. Approximately 15% of the growth requirements of the Local Plan is to be delivered at the BGV. Noting the constraints to developing the City elsewhere, together with the role provided by sustainable urban extensions in meeting housing needs as set out in the NPPF, our Client welcomes the broad area of search. It has long been established that South of Lancaster is not constrained by Green Belt policy and has the greatest potential to deliver sustainable housing and economic growth, linked to the success of Lancaster University and which benefits from public transport connectivity. This strategy is supported by Story Homes.
33. Most recently Story Homes, alongside Peel and Commercial Estates Group (CEG), has written to support the Council's Housing Infrastructure Bid. A copy of that letter is attached at Appendix 2. The letter follows a series of workshops and meetings held jointly with both the City and County Councils over the last 2-year period, with parties working together to advance the strategy for BGV.

#### Deliverability

34. Our Client welcomes the Council's recognition that not all of the 3,500-dwelling capacity identified at BGV is deliverable within the plan period. Given current uncertainty about how the Site is likely to come forward, our Client questions how realistic the 1,655-dwelling delivery assumption is within the housing trajectory, as made by the Council. Current uncertainties facing BGV include:
  - The need for the Council to prepare and adopt a site-specific Area Action Plan ahead of the submission of any planning application. This is effectively another Local Plan document, the timetable for which is not set;

- The need for the Council to define the Site from a much wider area of search as currently identified on the policies map;
- The need to identify the location of and secure sufficient funding for reconfiguring junction 33 on the M6 removing the bottleneck through Galgate, together with a new link road south Burrow Heights; and
- The need to secure the development of key infrastructure to make the site sustainable.

35. These fundamental issues are likely to take time in order to be resolved, with the effects being to push back the delivery of housing on the Site.

36. The housing trajectory for BGV is set out in Appendix E of the Local Plan. The Housing Trajectory assumes that first housing completions will occur in 2021/22 with 30 dwellings expected to be delivered. This is only 2-3 years away. Given these significant issues identified above which need to be clarified and addressed ahead of the delivery of new dwellings, there is insufficient evidence to justify the Council's position.

37. It is for these reasons that Story Homes has been working with both Peel and CEG to examine the potential of an amended Policy SG1 structure and delivery mechanism for BGV. This comprises of:

- The release of land at Ashton Road now, separate to BGV; and
- The allocation of part of BGV to support the release of the Peel and CEG land to facilitate early delivery.

38. To achieve this, Story Homes has been party to a Memorandum of Understanding between landowners and has also had several discussions with the Council regarding a Statement of Common Ground with the Council. It is suggested that BGV can be delivered via a Strategic Development Framework and Masterplan, to be adopted as Supplementary Planning Guidance. This would provide a speedier and equally robust delivery mechanism to the AAP. Wording is also suggested as a modification to Policy SG1 to enable the delivery of BGV to the anticipated trajectory timetable, thus making Policy SG1 sound.

39. To further assist, Peel, CEG and Story Homes have provided a Vision Document to set out how the northern parcel of BGV could be brought forward as an early phase. The early phase includes the Ashton Road land for completeness, although it is Story Homes' position that this should be allocated separately now, given the proposed allocation at the Preferred Options stage.

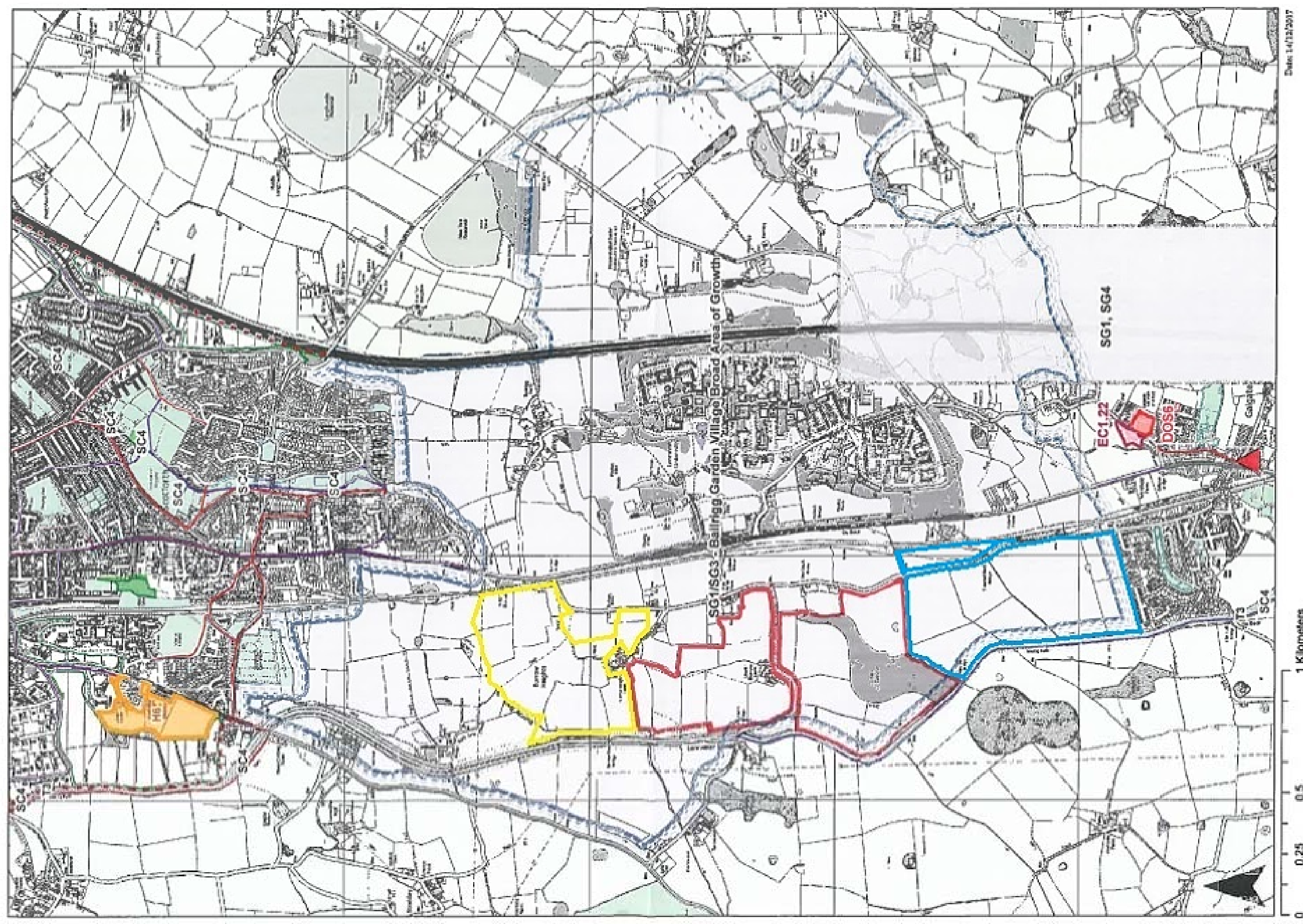
40. Appended to this Statement are the following:

- Plan showing Story Homes' controlled land south of Burrow Heights Farm.
- Copy of letter sent by in support of Lancaster HIF bid.
- Copy of Memorandum of Understanding between Peel, Story Homes and CEG.
- Suggested Modifications to Policy SG1.
- Draft Statement of Common Ground between Peel, Story Homes and CEG and Lancaster City Council.
- Vision Document for South Lancaster early release land.

**MATTER 3**

**APPENDIX 1**

**PLAN SHOWING STORY HOMES' CONTROLLED LAND SOUTH OF  
BURROW HEIGHTS FARM**



0 0.25 0.5 1 Kilometers

Date: 14/12/2017

**MATTER 3**

**APPENDIX 2**

**COPY OF LETTER SENT IN SUPPORT OF LANCASTER HIF BID**



**Private and Confidential**

Lancaster County Council,  
County Hall,  
Fishergate,  
Preston,  
Lancashire,  
PR1 8XJ

Friday 22<sup>nd</sup> March 2019

**South Lancaster Landowners Letter of Support - Lancaster County Council's Housing Infrastructure Fund Application (March 2019)**

To whom it may concern,

I am writing on behalf of Story Homes Limited, Peel Investments (North) Limited (Peel) and Commercial Estates Group (CEG), hereby known as the South Lancaster Landowner Group, to outline our support for Lancaster County Council's (LCC's) application to the Housing Infrastructure Fund (HIF). Story, Peel and CEG between them are representing over 400 acres of land within the core of the South Lancaster Growth Area. The proposals put forward by the South Lancaster Landowner Group are longstanding, well known and pre-date the Garden Village concept. The HIF application is sponsored by Lancaster City Council and aims to unlock the full development potential within the South Lancaster Strategic Growth Area, accelerating over 7,000 homes, commercial and community uses to come forward over the plan-period (2011-2031) and further homes beyond the plan period. The Bailrigg Garden Village (BGV) sits within this Strategic Growth Area.

Policy SG1 within the submission version of the Local Plan for Lancaster (May 2018) identifies the BGV as a Broad Location for Growth, a map of which is included at Appendix 1. This Broad Location for Growth encompasses a large portfolio of land; as noted above, a substantial proportion of which is made up of land under the control of Story Homes, Peel and CEG respectively. The University of Lancaster own large parcels of land both to the east of the A6 and the M6, Lancaster City Council also have ownership over land within the North of the area that has long been anticipated to provide a key access point. It is important to note that all of the parcels outlined above are included within the Broad Location for Growth / Strategic Growth Area / Bailrigg Garden Village. It is important for these areas to be considered in their entirety, as submitted within the Lancaster Local Plan, for the purposes of this HIF application.

For clarity, it is the intention of Story Homes, Peel and CEG to provide continuing support to Lancaster County Council, and Lancaster City Council who are key sponsors, in their application to the HIF. The landowners fully support LCC's application for circa £140 million of investment in order to secure the full development potential within South Lancaster. This funding will give the County





Council and Lancaster City Council the resources to deliver the key infrastructure for South Lancaster.

The delivery of the infrastructure will unlock and facilitate the delivery of the whole Garden Village, including residential and commercial elements, and ensure Lancaster City Council's housing delivery trajectory is met across the now second part of the plan-period, and beyond. Significant housing delivery in South Lancaster will be held back without the necessary infrastructure. Other mechanisms to fund these works has not been found.

Story, Peel and CEG have also consistently expressed their support for development in South Lancaster, the Broad Area of Growth and Garden Village in its submissions to the City Council in relation to the emerging Lancaster Local Plan. South Lancaster is a key sustainable location and provides a clear and widely recognized opportunity to deliver much needed new quality development and hereby help met the Council's strategic objectives for the wider District. The support outlined within this letter will be reinforced within the individual Hearing Statements prepared by each party for the up-coming Examination of the Lancaster Local Plan.

Development itself can help support the provision of infrastructure through delivery in accordance with the relevant tests in planning policy terms.

The proposal put forward by LCC also provides details surrounding delivery trajectory, not just of residential units but also of local facilities such as schools and healthcare provision. The Landowner Group welcomes the ambitious indicative trajectory and the intention to plan strategically in relation to community and supporting facilities. Building upon this, the Landowner Group also provides notable support for the delivery of residential units within the Bailrigg Garden Village commencing in 2021. This is reinforced by Story Homes, Peel and CEG's commitment to early delivery as stated within previous representations to the Lancaster Local Plan, and as will be included within the emerging Hearing Statements to the Local Plan Examination, due to commence shortly. We would like to take this opportunity to reiterate that all parties within the Landowner Group have undertaken significant work to ensure that, subject to obtaining planning permission, there are no obstacles to immediate development. The Landowner Group recognise that there is significant housing need within the Lancaster District and believe that in working with both the County Council and Lancaster City Council, South Lancaster provides an opportunity to accelerate home building, reduce housing pressures across the wider District. It is important that the HIF funding provides and supports accelerated housing delivery in a way which is both viable and sustainable.

This letter produced by Story Homes Limited, Peel Investments (North) Limited and Commercial Estates Group intends to clearly document our support for sustainable development in South Lancaster and Lancaster County Council and their submission to the Housing Infrastructure Fund. Story Homes, Peel Investments (North) limited and Commercial Estates Group are committed to the



delivery of new development in the South Lancaster Growth Area and Bailrigg Garden Village and provide support for the key principles and vision underpinning this. We are grateful for the opportunity to provide support to this submission to the Housing Infrastructure Fund made by Lancaster County Council.

Yours faithfully

John Winstanley

for Story Homes Ltd

David Thompson

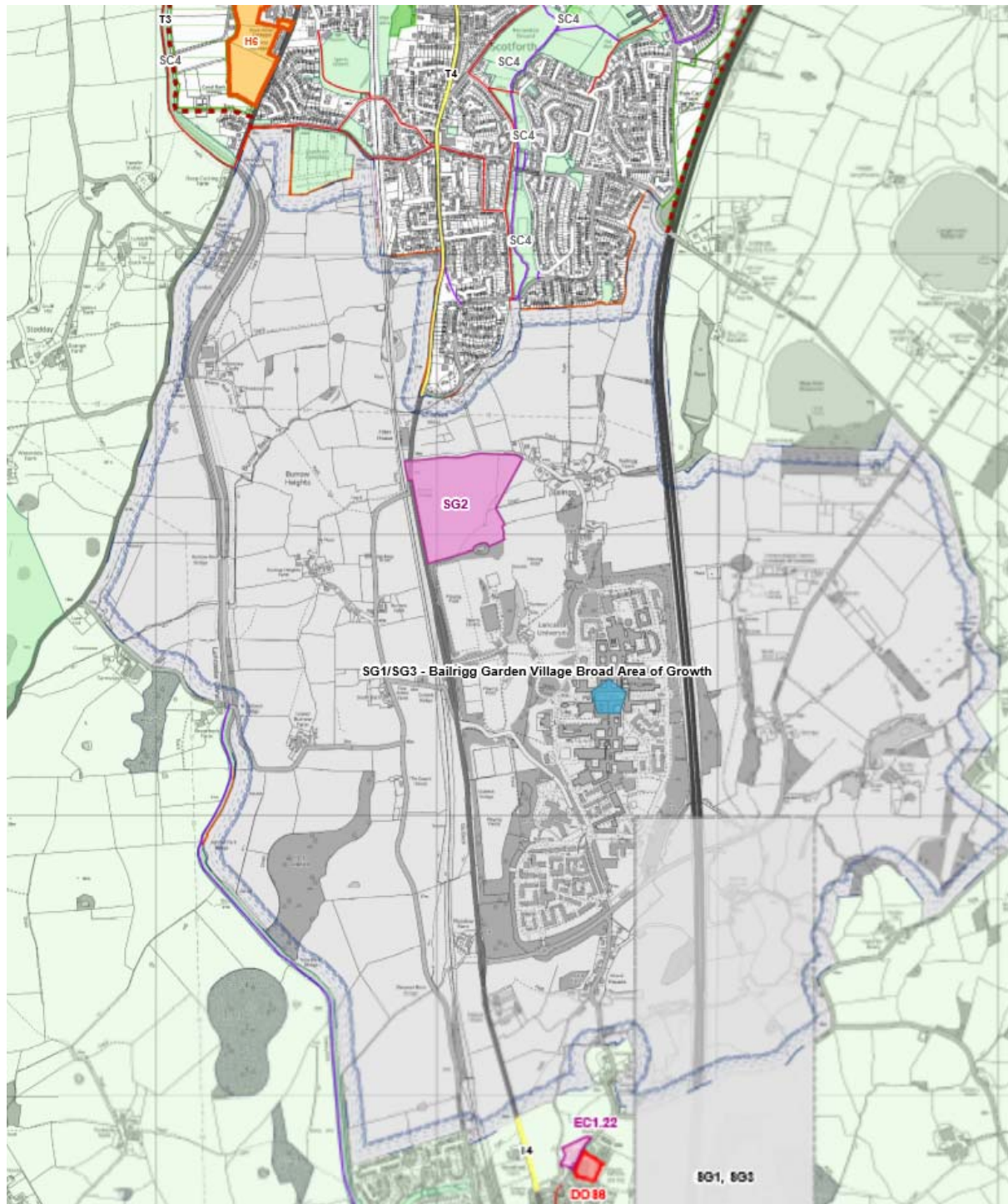
for Peel Investments (North) Ltd

Will Martin

for Commercial Estates Group



**Appendix 1 – Local Plan for Lancaster District Policies Map (Inset Map 1) (May 2018) (the Board Area of Growth is shown by the grey outline)**



**MATTER 3**

**APPENDIX 3**

**COPY OF MEMORANDUM OF UNDERSTANDING BETWEEN  
PEEL, STORY HOMES AND CEG**

## **South Lancaster: Memorandum of Understanding**

This Memorandum of Understanding is prepared jointly on behalf of Commercial Estates Projects (CEP), Peel Investments (North) Limited (Peel) and Story Homes Limited; hereby known as the South Lancaster Landowner Group (or 'Landowner Group').

Subject to the individual representations submitted in relation to the Lancaster Local Plan ['LLP'] by each party, the Landowner Group welcomes the production of the 'LLP' to ensure Lancaster City Council has an up-to-date local plan in accordance with the national policy. The Landowner Group supports in principle:

- The proposed Spatial Vision for Lancaster District.
- The Strategic Objectives, Settlement Hierarchy and Development Strategy for the District.
- An urban-focused approach to development supplemented by large strategic greenfield development sites principally on the edge of the regional centre, Lancaster, which are critical to meet development needs.
- Development of Broad Location for Growth: Bailrigg Garden Village, as South Lancaster represents the most sustainable location for strategic development.

### **Policy SG1: Broad Location for Growth - Bailrigg Garden Village**

#### **Support for Bailrigg Garden Village**

The Submission Draft Local Plan for Lancaster (LLP) identifies Bailrigg Garden Village (BGV) as a Broad Location for Growth (BLG) (Draft Policy SG1). The Government's designation of the Bailrigg Garden Village in January 2017 is intended to accelerate housing delivery and thereby help address the housing crisis and support local areas. These objectives must be a key strand within the LLP.

The BLG encompasses a large portfolio of land, a substantial proportion of which is under the control of the South Lancaster Landowner Group. Collectively they own /control c.162ha (400 acres) of land within the core of the BLG, lying on the west side of the A6 between Galgate and the southern built up area of the city. Land to the east of the A6 largely comprises the Lancaster University Campus and additional land in the University's ownership.

The South Lancaster Landowner Group has consistently expressed its support for development in South Lancaster, the Broad Location for Growth and Garden Village; this is evident in the Group members' submissions to the City Council in relation to the emerging Lancaster Local Plan. They are keen to work with Lancaster City Council to see delivery of the development as soon as possible.

The land is not within the Green Belt or subject of any environmental protection designations; technical assessments show there are no major physical constraints on the land. It is a key sustainable location and provides a clear and widely recognised opportunity to deliver much needed new housing, employment and other development, playing a significant role in meeting the Council's wider strategic objectives for the district.

In recognition of its strategic importance, it is important that the BLG designation is anchored within the adopted plan.

## **Key Principles**

Draft policy SG1 identifies a range of 'key principles' that will be at the heart of planning and development of BGV. The South Lancaster Landowner Group agrees with those key principles and supports their inclusion within the LLP. They will ensure that the development:

- Is of high quality urban design, creating a sense of place and community for its residents
- Delivers a wide range of market and affordable housing delivered by a range of providers from national housebuilders to self and custom-build properties
- Includes all necessary infrastructure at the right time and in the right place to deliver sustainable growth
- Creates and supports opportunities for sustainable travel
- Supports local and strategic improvements to highways infrastructure
- Includes areas of high quality open space to provide a distinct sense of place
- Is designed to take proper account of climate change and manage water run-off

The South Lancaster Landowner Group agrees that development at the BGV should be comprehensive and coordinated; they have prepared a 'Vision Document' for the BGV to demonstrate how their individual and collective land ownerships are complementary and can contribute towards meeting the housing needs of Lancaster in accordance with that overarching objective and the key principles for the BGV.

## **Mechanism for Delivery**

The members of the South Lancaster Landowner Group are committed to working together and with the City Council to develop the BGV; they support the Housing Trajectory at Appendix E of the submitted draft LLP which shows housing delivery on the site commencing in 2021 and contributing c.1,655 dwellings in the plan period (see also draft policy SP6). In order to achieve those required levels of development, BLG needs to start delivering new homes from 2021. The Landowner Group agrees that this is both desirable and achievable; its members have collectively and separately undertaken significant work to ensure that, subject to obtaining planning permission, there are no insurmountable obstacles to immediate development on land within their own or the Council's control. Early delivery would accord with the Garden Village status which supports the Government's imperative to 'boost significantly' housing land supply.

The Landowner Group recognises that there is significant housing need within the Lancaster District and believe that, in working with Lancaster City Council and Lancashire County Council as highway authority, BLG provides an opportunity to accelerate home building in Lancaster, support the economic growth ambitions of the Council linked to the Lancaster University Health Innovation Campus, and reduce housing pressures across the wider district. They have held a number of joint meetings and also met with Lancaster City Council to discuss an appropriate mechanism for delivery in accordance with the trajectory in the submission draft LLP; not just of residential units, but also of local facilities such as schools, open space and health care provision.

Whilst the Landowner Group is supportive of the work LCC is undertaking to bring the Garden Village forward, the Group questions the proposed policy mechanism of delivery for the Bailrigg Garden

Village primarily through the preparation of an Area Action Plan (AAP). It is concerned that use of an AAP, as currently proposed in draft policy SG1, is likely to result in unnecessary delay to delivery of the Garden Village, preventing development commencing in 2021 and resulting in a higher level of unmet housing need across the district. In order to meet the aspirations and objectives of the LLP it is necessary to introduce a mechanism allowing the ability for appropriate parts of the Garden Village to deliver early and flexibly. This could be achieved through allocation of specific land parcels.

### **Allocations**

The Landowner Group has written to Lancashire County Council to demonstrate its support for the HIF bid submitted on 22 March 2019. It is important that the HIF funding provides and supports accelerated housing delivery across the BGV in a way which is both viable and sustainable.

The technical work undertaken by the Landowner Group includes a Highways Technical Note which demonstrates that it would be possible to bring forward some housing development at BGV in advance of the major infrastructure works that will be delivered through the HIF. In order to maintain the momentum of house building in the District, it would be appropriate to allow development at BGV in advance of the HIF funding and adoption of the SDF (or other suitable policy document), subject to the applicants demonstrating:

- (a) there would be no cumulative severe effects on the highways network;
- (b) the proposals would not prejudice the development of adjacent parcels of land within the BGV; and
- (c) compliance with the key principles of Policy SG1.

The following land parcels are located at the northern end of the BGV; they represent the first logical stage of development as a sustainable urban extension of South Lancaster and integral part of the BGV:

- Land at Lawson's Bridge: the site is the subject of a current application by CEG for c.95 dwellings. Access would be taken from the A6 and facilitate a link to bridge over the West Coast Main Line for access into Whinney Carr and the wider BGV
- Whinney Carr: located adjacent to the urban edge of Lancaster with a long history of being identified as suitable for housing development. Initial phases of development could be accessed from Ashford Road to the north utilising council controlled land with an additional link in due course to the A6 through the Lawson's Bridge site.
- Land at Ashton Road: This site has the capacity for 140 dwellings and was previously identified for allocation at the Preferred Options stage. It is a stand-alone site that is capable of being brought forward separately to provide early delivery of housing.

The Landowner Group agrees that a 'joined up' approach to development is required. They have jointly prepared a Vision Document to demonstrate how land to the west of the A6 could be brought forward for development as part of a cohesive spatial framework for that land.



## Amendments to Policy SG1

In order that the LLP is positively prepared and effective in delivering housing development in Lancaster in accordance with its ambitions, the Landowner Group suggests amendments to draft Policy SG1 that will make the plan sound by ensuring that it is positively prepared, effective and in accordance with national planning policy:

- Allocate specific land parcels at Bailrigg Garden Village for development;
- Permit the identified land parcels to be brought forward for development in advance of adoption of the AAP provided that it:
  - is in accordance with the Key Principles of Policy SG1
  - does not result in severe cumulative impact on the transport network; and
  - does not prejudice delivery of development on adjacent land.

Text changes to draft Policy SG1 are attached.

Signed on behalf of:


(John Winstanley)

(David Thompson)

Story Homes Limited

Peel Investments (North) Limited



  
on behalf of CEP  
02/04/19  
(Will Martin)

Commercial Estates Projects  
(part of CEP).



2 April 2019

**MATTER 3**

**APPENDIX 4**

**SUGGESTED MODIFICATIONS TO POLICY SG1**

## Policy SG1: Broad Location for Growth– Bailrigg Garden Village

The Council has identified a Broad Location for Growth -Bailrigg Garden Village on the Local Plan Policies Maps. This will be a major mixed-use development which focuses on the delivery of at least 3,500 new houses, a number of opportunities for employment and economic growth opportunities including the delivery of Lancaster University Health Innovation Campus.

### *Key Principles of the Garden Village*

The Council has defined a range of principles which will be at the heart of planning and development for the Garden Village, these include:

- Involving local communities in the creation of new development where high-quality urban design promotes sustainable, attractive places to live, defines a sense of place and creates a sense of community for its new residents.
- Seeking a modal shift in local transport movements between the Garden Village, including Lancaster University Campus, Lancaster City Centre and beyond into the employment areas of Morecambe/ Heysham through the delivery of a Bus Rapid Transit System and Cycling and Walking Superhighway network.
- Delivering a wide range of market and affordable housing, in terms of type and tenure to ensure that opportunities to live in the Garden Village are available to all sections of the community and contribute significantly to the district meeting its evidenced housing needs particularly in the medium and long term phases of the Local Plan period.
- Ensuring that the necessary infrastructure to deliver sustainable growth is delivered in the right place, at the right time, to address strategic constraints to the delivery of future development.
- The creation of sufficient areas of high quality open spaces to provide a distinct sense of place and deliver a network of green corridors across the Garden Village to the benefit of the local environment and residents. The delivery of such spaces should include distinct areas of separation between the core of the Garden Village area and South Lancaster and also Galgate and investigate opportunities for a new country park.
- The creation of healthy and cohesive communities through the delivery of high quality development and the correct levels of services and infrastructure which is provided in safe and accessible locations.
- The sympathetic masterplanning of new facilities and growth within the campus of Lancaster University for a range of educational facilities and student accommodation.
- Taking proper account of the need to reduce the impacts of Climate Change in the design of new development. This should assure that new development is resilient to the effects of Climate Change.
- Managing water and run-off to safeguard development, assuring public safety and amenity and take active measures to reduce flood risk within the area and downstream for both existing and new residents and businesses.
- Offering opportunities for national housebuilders to work alongside local construction firms and encourage training opportunities for local people, particularly through the construction phases of the Garden Village. The Garden Village should also include opportunity for the provision of self-build and custom-build properties.

- To assure innovative urban design both in terms of the layout and density of new development and the specific design of new buildings. This should include the application of new technologies for buildings and transport where possible.
- Addressing longstanding constraints and capacity issues in the strategic and local road network through the improvements to traffic management and physical interventions to increase capacity. This will involve the re-configuration of Junction 33 of the M6 to allow direct motorway access into the Garden Village and remove motorway traffic from Galgate which is currently designated as an Air Quality Management Area (AQMA).

To support the delivery of the Garden Village, there will be a requirement for a wide range of both locally important and strategically important infrastructure, including new highways, public transport network, education provision, new local centre(s), open spaces and green network. These are set out in Policy SG3 and will be addressed in more detail in the future Spatial Development Framework, which will form a Development Plan Document (DPD) for the Bailrigg Garden Village.

Future proposals will need to demonstrate that no European designated site would be adversely affected by development either alone or in combination with other proposals, as per the requirements of Policy EN9 of the DPD. In view of the potential for likely significant effects as a result of this allocation development proposals at Bailrigg Garden Village must accord with the requirements of Appendix D of the Local Plan. must delivered as part of any future proposal.

To enable a comprehensive and co-ordinated approach to new development and strategic growth, piecemeal or unplanned development proposal within the area which are likely to prejudice its delivery (including infrastructure required for the area) will not be permitted beyond that which has already secured planning permission or on the land identified on the Proposals Map as a sustainable urban extension of Lancaster. and proposals which are sited within the development footprint of Lancaster University Campus. Planning permission will be granted on those sites in advance of the adoption of the Bailrigg Garden Village DPD where it is demonstrated that the development:

- will not result in severe cumulative impacts on the transport network
- will not prejudice the delivery of adjoining land within Bailrigg Garden Village
- will support an integrated and coordinated approach to the development of the Bailrigg Garden Village; and
- accords with the Key Principles set out in this policy.

#### *Mechanism for Delivery of the Garden Village*

The Council will prepare and implement a specific Development Plan Document (DPD)—for this area of growth, entitled the-Bailrigg Garden Village Area Action Plan DPD. As a result Subject to support for a sustainable urban extension on the land identified on the Proposals Map, development in this area will be delivered in accordance with this Area Action Plan—and the Council will not support piecemeal development of the area (beyond existing planning commitments) in advance of the preparation of this DPD.

The recommendations of the Local Plan (Part One) Sustainability Appraisals should be taken into account when preparing this document.

The purpose of the DPD will be as follows:

1. To provide more detail on how the development principles set in this policy will be delivered;
2. To set out a Spatial Development Framework ~~as a basis for further master planning and to~~ and masterplan to help guide the preparation and assessment of future planning applications;
3. ~~To provide a Spatial Development Framework against which future development proposals and planning applications will be assessed~~
4. To enable and support the co-ordination and timely delivery of the infrastructure necessary to facilitate growth in this location.

The potential for the future re-configuration of Junction 33 of the M6 and highway network improvements in South Lancashire will be an integral part of this forthcoming DPD.

To ensure the timely delivery of the Bailrigg Garden Village, work on a Spatial Development Framework and the wider DPD has already commenced and is anticipated to be ready for adoption within the first 2 years of the plan (i.e. before 2022). In order to maintain housing delivery rates in the District, planning applications within the sustainable urban extension area identified on the Proposals Map will be assessed against the Key Principles set out in this policy. within the first five years of the plan (i.e. before 2024). ~~Failure to achieve this may result in the need for an early review of the Local Plan to ensure that housing delivery rates are maintained to meet development needs.~~

**MATTER 3**

**APPENDIX 5**

**DRAFT STATEMENT OF COMMON GROUND BETWEEN  
PEEL, STORY HOMES AND CEG AND LANCASTER CITY COUNCIL**

## **Statement of Common Ground**

Between: Lancaster City Council and:

Commercial Estates Group, Peel Investments  
(North) Ltd and Story Homes Limited

### **Strategic Policies and Site Allocations Plan**

Draft Policy SG1: Broad Location for Growth -  
Bailrigg Garden Village



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Sam Ryan  
sam.ryan@turley.co.uk

**Client**  
Peel Investments (North) Ltd

**Our reference**  
PEEM3048

28 Mar 2019

# 1. Introduction

- 1.1 This statement of Common Ground has been prepared jointly by Lancaster City Council (LCC) and: Commercial Estates Group (CEG), Peel Investments (North) Limited (Peel) and Story Homes Limited (“the Parties”).
- 1.2 The statement relates to the Bailrigg Garden Village Broad Location for Growth (Policy SG1) in the Submission Draft Strategic Policies and Site Allocations Plan (SP&SAP).
- 1.3 The statement sets out the Areas of Common Ground between the Parties in relation to the allocation and delivery of development from the site.

## 2. Background

- 2.1 The Submission Draft SP&SAP identifies Bailrigg Garden Village (BGV) as a Broad Location for Growth (BLG) (Draft Policy SG1).
- 2.2 The BLG encompasses a large portfolio of land, a substantial proportion of which is under the control of Commercial Estates Group (CEG), Peel Investments (North) Limited (Peel) and Story Homes Limited (Story); collectively referred to as the South Lancaster Landowner Group (or 'Landowner Group'). They own /control c.162ha (400 acres) of land within the core of the BLG lying on the west side of the A6 between Galgate and the southern built up area of the city. Land to the east of the A6 largely comprises the Lancaster University Campus and additional land in the University's ownership.
- 2.3 The Landowner Group has consistently expressed its support for development in South Lancaster, the Broad Location for Growth and Bailrigg Garden Village. They have individually and collectively made submissions to the City Council in relation to the emerging Lancaster Local Plan.
- 2.4 The Bailrigg Garden Village secured funding from Government in January 2017 as one of the first wave of Garden Villages in England. Work is on-going by Lancaster City Council and Lancashire County Council to deliver Bailrigg Garden Village, including an application for HIF submitted on 22 March 2019, which was supported by the Landowner Group.

A copy of Garden Village application is at **Appendix 1**

### 3. Common Ground

3.1 It is common ground between the Parties that:

- (a) South Lancaster is the most sustainable location for major residential led mixed-use development in the district and presents the best opportunity in generations to extend Lancaster's strategic housing land supply.
- (b) BGV is critical to meeting the Spatial Vision and Strategic Objectives of the Local Plan
- (c) BGV will accommodate c.3,500 dwellings overall, making a significant and vital contribution towards meeting the market and affordable housing requirements of the district.
- (d) There are benefits in bringing forward development within the Bailrigg Location for Growth / BGV as soon as possible. Some development can be accommodated without severe impact on the transport network subject to local highways improvements.
- (e) In order to avoid development that would prejudice delivery of the BGV, the Council intends to prepare an Area Action Plan for the BLG as a Development Plan Document. In advance of the adoption of that DPD, planning permission will only be granted on that part of the area allocated on the proposals map as a sustainable urban extension of Lancaster.

A plan showing the proposed area for allocation is at **Appendix 2**

- (f) Development at BGV should be co-ordinated and would benefit from collaborative working between the Parties
- (g) The key principles set out in Policy SG1 provide an appropriate framework for development across the site

#### **Amendments to Policy SG1**

3.2 In light of the above, it will be necessary to make amendments to draft Policy SG1. The revised policy wording is at **Appendix 3**.

## 4. Declaration

Signed on behalf of Lancaster City Council:

Name:

Date:

Signature:

Signed on behalf of Commercial Estates Group (CEG)

Name:

Date:

Signature:

Signed on Peel Investments (North) Limited

Name:

Date:

Signature:

Signed on behalf of Story Homes Limited

Name:

Date:

Signature:

## **Appendix 1:    Bailrigg Garden Village Application**

## **Appendix 2:    Proposed Urban Extension**

## **Appendix 3: Amended Wording to draft Policy SG1**



**Turley Office**  
1 New York Street  
Manchester  
M1 4HD

T 0161 233 7676

**Turley**

**MATTER 3**

**APPENDIX 6**

**VISION DOCUMENT FOR SOUTH LANCASTER EARLY RELEASE LAND**



# South Lancaster

## Vision Document

April 2019





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14 Regent's Wharf, All Saints Street, London N1 9RL

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# Introduction

This Vision Document has been prepared jointly by Commercial Estates Projects Ltd ('CEP'; part of CEG), Peel Investments (North) Ltd ('Peel') and Story Homes Ltd (hereby known as the Landowner Group).

All three parties are currently working together to promote the development of key parcels of land within South Lancaster, and more specifically within the Bailrigg Garden Village / Broad Location for Growth which has been proposed by Lancaster City Council.

The Landowner Group's landholdings between Ashton Road and Scotforth Road (A6) cover a large area of land adjoining the southern edge of Lancaster. The development potential of this area has long been recognised by Lancaster City Council (LCC), most recently through its strategy for the Broad Location for Growth / Bailrigg Garden Village in its emerging Local Plan (Policy SG1).

The Garden Village designation is also supported by Central Government, which has made clear that it should result in early, accelerated and uplifted housing delivery. This is very much welcomed and the Landowner Group is keen to ensure that swift progress continues to be made. This Vision Document therefore sets out our latest thinking in terms of the form and delivery of new development within the wider Broad Location for Growth.

The Landowner Group have vast experience of bringing forward high-quality strategic housing and mixed-used developments, with a proven track record of delivery across the country.

The Landowner Group:

- supports in principle LCC's proposed Broad Location for Growth and Garden Village concept and Lancaster County Council's bid to Government for Housing Infrastructure Funding to help unlock the critical major infrastructure needed to deliver the whole Garden Village proposition
- considers it important that the LCC adopts a Local Plan as quickly as possible, to help guide the delivery of new development
- considers it important to establish early, quality development opportunities within South Lancaster; and
- is keen to engage positively with LCC and other stakeholders to see the successful delivery of new development in South Lancaster.

This Vision Document summarises the opportunities that exist.



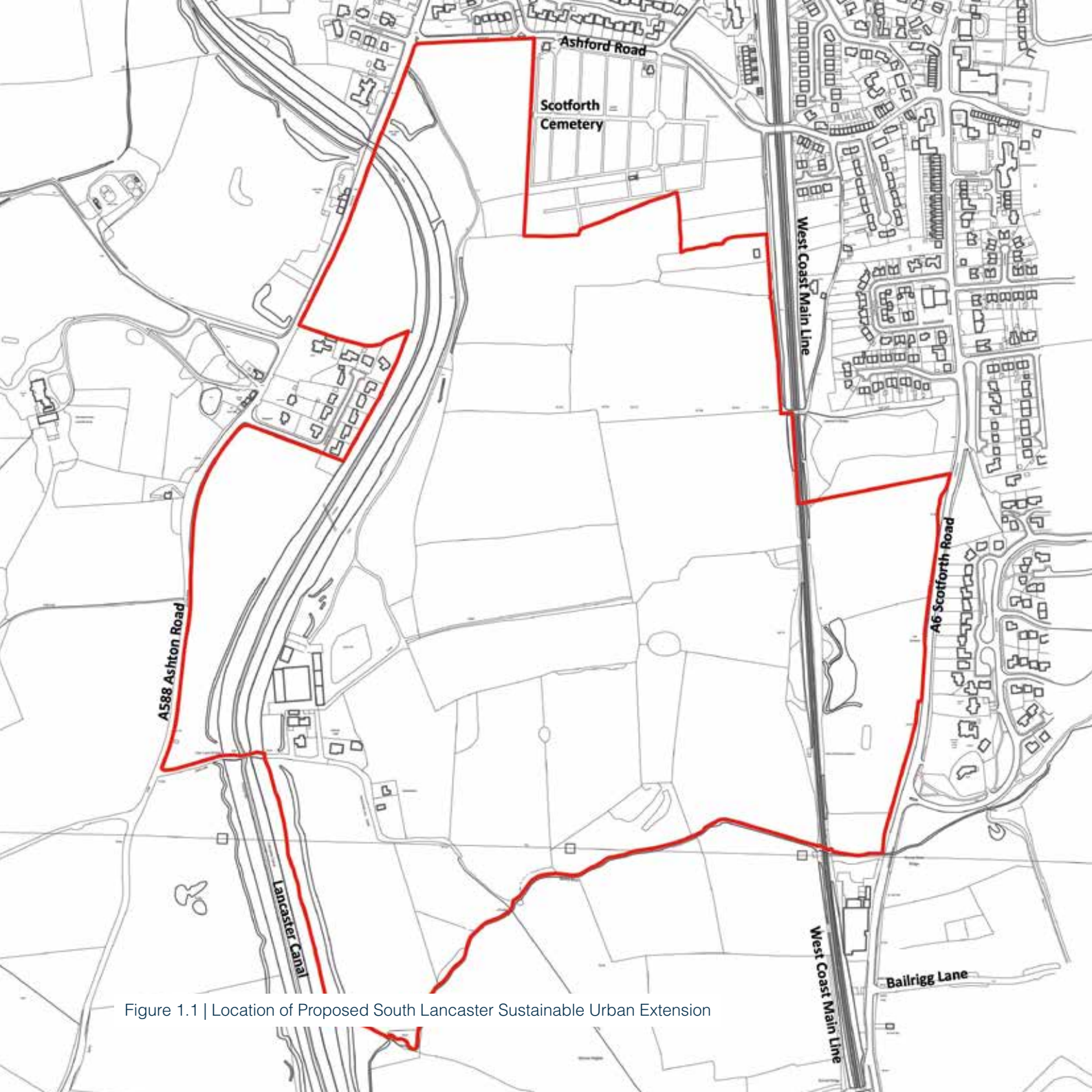


Figure 1.1 | Location of Proposed South Lancaster Sustainable Urban Extension

## A Strategy for Early Delivery

The Landowner Group agrees with LCC that South Lancaster offers the most important development opportunity in Lancaster. It occupies a highly sustainable location with good access to, and synergy with, existing facilities. In the draft Local Plan, LCC has indicated that new housing delivery in South Lancaster could begin in 2021/22.

As currently set out in the emerging Local Plan (the Strategic Policies and Land Allocations DPD), LCC's strategy is to identify a 'Broad Location for Growth' in South Lancaster which can accommodate a new residential-led mixed use development, including at least 3,500 new homes. The Landowner Group broadly supports this approach.

However, we believe that there must also be a specific 'first phase' allocation within the emerging Local Plan, relating to the northern extents of the Broad Location for Growth and effectively comprising an sustainable urban extension to South Lancaster within the Garden Village. This area is similar to that identified by LCC as a draft Local Plan allocation in 2012.

This is required to facilitate and ensure earlier delivery to provide the new homes needed and support economic growth ambitions. It could be brought forward without compromise to the principles of the wider Garden Village and secure a high quality of design and layout across the whole area. The wider Broad Location of Growth is shown on the Figure opposite, along with the Landowner Group's illustration as to how development to the west of the A6 could look.



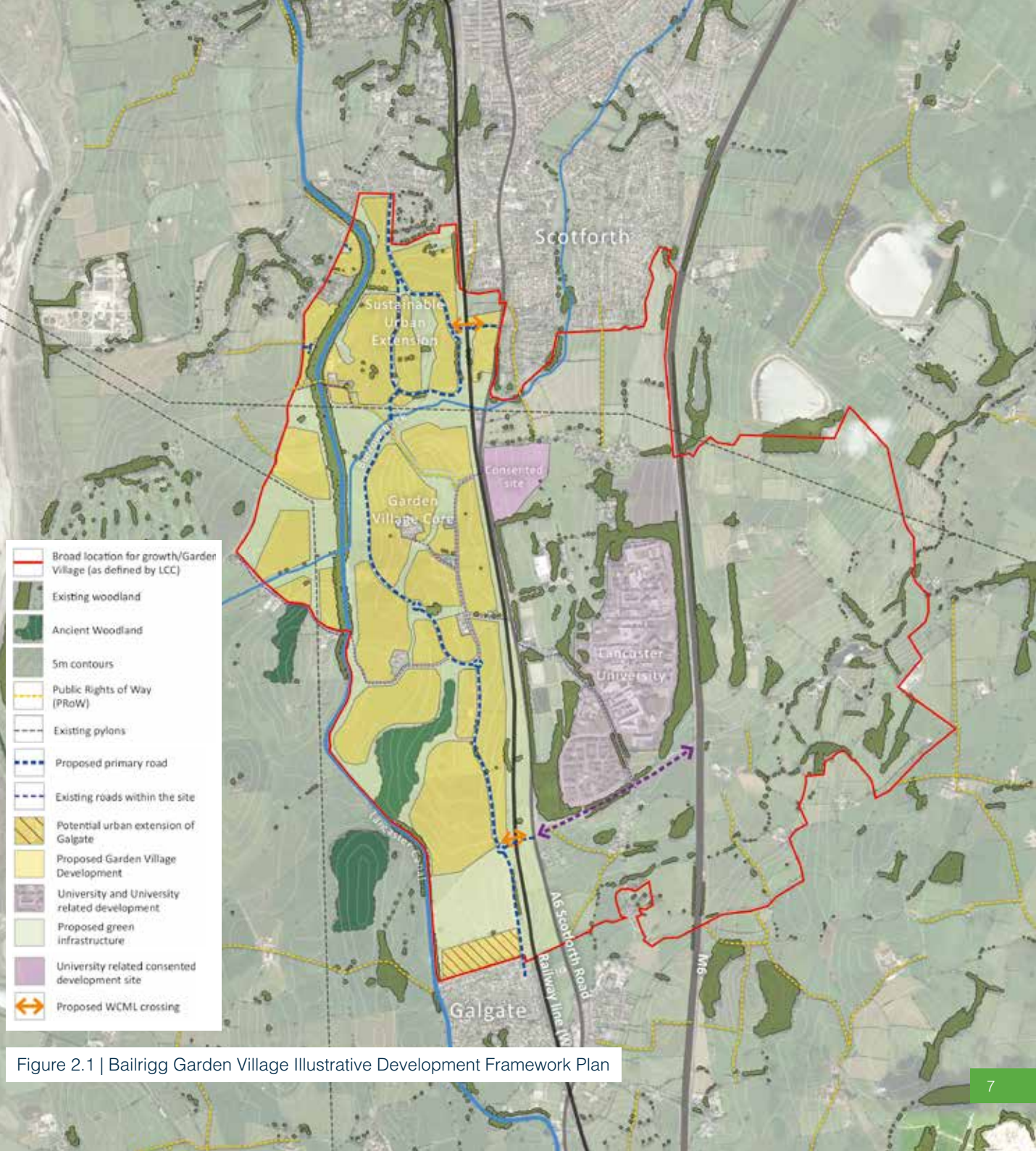


Figure 2.1 | Bailrigg Garden Village Illustrative Development Framework Plan

## Site and Surroundings

The Landowner Group collectively control land totalling approximately 168ha/420 acres within the core of the Bailrigg Garden Village 'Broad Location for Growth', as identified at Policy SG1 of the draft Local Plan.

Within this broader area, the proposed Sustainable Urban Extension allocation site which is identified for early delivery at South Lancaster comprises around 148 acres / 57ha. The proposed allocation site is crossed by the West Coast Mainline within its eastern extents, and by the Lancaster Canal towards its western limits. The site is undulating, with field boundaries marked by hedgerows and a number of trees and copses across the site.

The site for the proposed allocation is bounded:

- To the north by Scotforth Cemetery and allotments, with existing residential development, Ashford Road and the urban area of Lancaster beyond;
- To the south by Burrow Beck (which forms part of a green corridor network within the adopted Local Plan), beyond which lies open countryside proposed for latter phases of Bailrigg Garden Village;
- To the east by Scotforth Road (A6), beyond which lie existing residential areas and a range of strategic development sites, including Lancaster Health Innovation Campus, as well as Cinder Lane, part of a Strategic Cycle Network; and
- To the west by Ashton Road, with open countryside beyond.

The site is situated approximately 2.7km/1.6 miles to the south of Lancaster City Centre and close to Lancaster University (which is located approximately 1km/0.6 miles to the south east of the site).

The site adjoins the well-established residential area of South Lancaster, which includes local and neighbourhood shopping, restaurants, public houses and community facilities.

The character and appearance of the surrounding residential area is mixed. In architectural terms, the area includes 18th and 19th century stone houses and terraces, mid 20th century housing and contemporary housing developments.





KEY

- Site Boundary
- Bus Stop
- Park / Playing Fields
- Petrol Station
- Pub / Bar
- Take Away
- Local Shop
- Place of Worship
- Pharmacy
- School
- University
- Community Centre

Figure 3.1 | The Proposed Sustainable Urban Extension Allocation Site and Surrounding Area









“South Lancaster will be an exemplar development, within Bailrigg Garden Village. The Sustainable Urban Extension will be a distinctive community which Lancaster can be proud of, combining exceptional family and affordable housing using the best practice urban design and with an extensive accessible green infrastructure network. Each phase of development will be carefully planned and will integrate with the existing urban area and the wider Garden Village.”



## Our Vision

The Landowner Group has undertaken a masterplanning study which shows that the most northerly land within the Broad Location for Growth can be brought forward as a sustainable urban extension to the south of Lancaster without compromising the integrity or wider function of the proposed Garden Village. This reflects the early work undertaken by LCC in identifying options for the design of the development. The majority of the Sustainable Urban Extension site was proposed as such by LCC in 2012, prior to the larger Garden Village proposal coming forward.

It adopts a phased approach to development, distinguishing between a sustainable urban extension to Lancaster (in the northernmost part of the identified Location for Growth) and a new Garden Village community, all delivered according to a common set of principles.

This proposal will facilitate earlier delivery of development, particularly if a northern area can be brought forward through an allocation in the emerging Local Plan.

A subsequent Supplementary Planning Document (SPD) or Action Area Plan (AAP) produced by LCC could then be focussed more specifically upon the wider Garden Village. The 57ha/140 acre northern site would deliver circa. 1,200 new homes, affordable housing, a green infrastructure setting, recreational facilities, a new local centre and, if needed, land for a new primary school.

It could also open up access to the Lancaster Canal corridor from the east, through the creation of a new cycleway and accessible green spaces; forming a blue and green corridor running through the development.

The Masterplan area is based on the Broad Location for Growth area - as defined by Lancaster City Council. This includes the land owned by CEG, Peel and Story Homes and other landowners, including the City Council and the Lancaster University. The successful delivery of the whole Masterplan vision will inevitably require the involvement and agreement of a number of landowners and stakeholders. The City Council will have a lead role in this.

The illustrative masterplan has been designed around three guiding principles of People, Place and Movement. It will be developed and refined through consultation with Lancaster City Council and Lancashire County Council and other key stakeholders.



People	Place	Movement
<b>A range of housing</b> Circa. 1,200 new homes with an emphasis on family and affordable housing - providing a mix of housing types and tenures.	<b>An aspirational place</b> Strong place-making and high quality landscape features which provide an attractive neighbourhood with unique character.	<b>Modal shift</b> A sustainable new community which will promote positive modal shift through design - reducing reliance on private car use.
<b>Economic growth</b> Direct and indirect economic benefits which will support and drive economic growth, including through their proximity to, and synergy with, Lancaster University.	<b>Habitat creation and protection</b> Retention of valued habitats and enhancement of biodiversity resources via green infrastructure, wetlands and hedgerow tree planting.	<b>Public transport</b> The layout will offer enhanced and new bus service routes to maximise local take-up and also enable the Council's future plans for a Bus Rapid Transit ('BRT') system for the wider Garden Village.
<b>Social infrastructure</b> Services and facilities which meet local needs including land for a primary school (if necessary), local centre, green infrastructure, formal playing pitches and children's play spaces.	<b>Sustainable drainage</b> A comprehensive SUDS network which provides robust flood protection and management.	<b>Connections</b> Direct access to key arterial transport routes, including Scotforth Road (A6) and Ashton Road (A588).
<b>Health and well-being</b> New access to a substantial network of leisure and recreational areas.	<b>Sustainable energy</b> Exploration of renewable energy generation and sustainable construction to minimise carbon impact.	<b>Footpaths and Cycleways</b> Enhancement of the local network of public rights of way, footpaths and cycleways.

## A Masterplanned Approach

Bairrigg Garden Village has Government support and is targeted at accelerating housing delivery in Lancaster, within a quality setting.

The Landowner Group have developed an Illustrative Masterplan for their sites (and certain adjoining land - which has already been included within the Council's Broad Location for Growth) to demonstrate how the design and form of development will respond sensitively to the characteristics of the site and the wider area.

It is expected that the South Lancaster Sustainable Urban Extension will be allocated for development, and then brought forward through the planning application process which would follow.

All stages of development (applications and plan-making) will involve comprehensive public consultation on the detailed proposals as they come forward.

The development will be planned with best practice for urban design and green infrastructure in mind, in order to deliver a family friendly residential area appropriate to its location. The site layout will seek to retain, protect and enhance key features in the landscape and incorporate them into the development for the benefit of existing and future residents and wildlife.

The layout and design of buildings will seek to complement the existing urban areas to the north and the proposed wider Garden Village to the south.

The illustrative Masterplan demonstrates that the Sustainable Urban Extension can deliver approx. 1,200 dwellings at a density of around 35 dwellings per hectare, together with land for a potential primary school and local centre. Family housing ranging from 2 to 5 bedrooms will be provided, a proportion of which will be affordable housing. House types may include terraces, semi-detached and detached dwellings.

Housing will be designed to reflect the local character and distinctiveness of the area with traditional building forms incorporating the range of materials currently found in the area but detailed to create a distinctive local character. Housing will be predominantly 2-storey, with some 2½ and 3 storey buildings used to create visual interest in focal areas.





Figure 5.1 | South Lancaster Sustainable Urban Extension Illustrative Masterplan



## A Masterplanned Approach

Fundamentally, the illustrative masterplan is in accordance with the key principles of the Garden Village/Broad Location for Growth as set out by the Council in its draft Policy SG1 of the emerging Local Plan, and will be based upon the following design concepts:

### Connections

Linkages to all key destinations including local amenities, Lancaster University, the Lancaster Canal and the city centre, and also the wider Garden Village to the south will be created to ensure the integration of the development with the adjacent areas.

### Views and vistas

Parkland will be developed on high land at the heart of the site to maximise the potential for views out from public spaces and to enable the creation of a soft skyline in views towards the site.



### Local character

Existing hedgerows, trees, stone walls, small woodlands and other local landscape features will be retained, where practicable, to lend character to the development and guide the alignment of spine roads. Traditional building forms combined with careful choice of elevational materials and attention to urban layout will be used to create a sense of place and encourage modal shift.

### Green Infrastructure

A linked network of multifunctional greenspace will be laid out which responds to topography and existing landscape elements, provides a setting for pedestrian and cycle movement around the site, and an appropriate interface with the wider countryside. A distinct area of separation will follow the general route of the Burrow Beck (which demarks the site's southern boundary), separating the development from the wider Garden Village to the south.





## Site Suitability

The Sustainable Urban Extension site is the most appropriate location for early phase development within the 'Broad Location for Growth' for Bailrigg Garden Village, and should therefore be the priority site for release in order to meet the District's housing requirement and other social, economic and environmental objectives.

The Landowner Group fully recognise that wider infrastructure needs to be planned for and delivered to achieve the delivery of the wider Garden Village (including strategic highway infrastructure), and acknowledge the need for further work in this respect.

However, the Group has collectively already prepared an extensive and comprehensive evidence base supporting the release of their sites. This includes technical reports in respect of highways and transport capacity, landscape and visual impacts, and ecological assessments.

In addition, a large part of the site, known as 'Whinney Carr', was previously the subject of a planning application for 535 dwellings in 2000 (application ref. 98/01207/OUT). The Council supported this application, as did a Planning Inspector following call-in, however it was ultimately refused by the Secretary of State in light of changes at that time to the housing requirement set out within Regional Planning Guidance.

The Inspector's 2002 Report on the scheme concluded that the site is well-placed to be a sustainable urban extension in terms of access to jobs and social infrastructure.

More recently, the majority of the Sustainable Urban Extension site has been identified in a number of Council studies on suitable housing sites, as a draft Urban Extension allocation, including in a draft of the Local Plan in 2012 and now as a part of a wider Broad Location for Growth and Garden Village designation.

Availability	Suitability	Achievability
<p>Much of the site is available for development immediately.</p> <p>CEP has now submitted an outline planning application for the development of up to 95 residential dwellings on the eastern portion of the site, as well as a link road which will facilitate longer term access across the West Coast Mainline to the Whinney Carr site.</p> <p>Story Homes also have development proposals relating to around 140 new dwellings on the western parcel of land between Ashton Road and Lancaster Canal.</p> <p>Working in conjunction with LCC, a first phase access to Peel's Whinney Carr site could be provided to Ashford Road - thereby bringing forward early delivery on this site.</p> <p>Residential development on the Whinney Carr site is a longstanding and well known proposition and would now form the proposed Sustainable Urban Extension.</p>	<p>The site is largely contiguous with the built-up area of South Lancaster and is functionally and perceptually linked to this existing well established residential community. It benefits from a highly sustainable location on a strategic transport corridor, and is situated within close proximity to existing residential and commercial areas, with a number of shops and services located a short distance to the north.</p> <p>The Council's 2015 Strategic Housing Land Availability Assessment also identifies land at Whinney Carr (ref. 341), which includes the majority of the collective site, as being potentially suitable for residential development, with a capacity for up to 900 dwellings. Detailed technical assessments prepared by LCC and the Landowner Group have demonstrated that there are no physical or environmental constraints to development.</p>	<p>The Landowner Group are willing and keen to work together and with other stakeholders to deliver housing development on their sites without delay. This is reflected in the recent submission of a planning application for up to 95 dwellings and a link road through CEP's part of the site. In addition, the Council's evidence base also supports the delivery of land at South Lancaster in the short term.</p> <p>In particular, the Transport Assessment prepared by WYG for the Council suggests that a large part of the northern site is capable of being delivered in the short term, without giving rise to severe harm to the local highway network or necessitating the delivery of any 'strategic' longer term highways improvements. This is supported by further analysis, undertaken by Bryan G Hall on behalf of the Landowner Group, which has found that initial development can be delivered without the need for the strategic infrastructure tied to the wider Garden Village proposals and HIF Funding bid.</p>

## Infrastructure

CEP, Peel and Story Homes are three of the UK's leading landowners and developers, with a track record of bringing forward and facilitating high quality and sustainable residential and mixed use schemes.

The sustainable urban extension / first phase of the Garden Village proposed in the northern part of the Broad Location for Growth will provide new infrastructure to ensure that the neighbourhood is sustainable, has access to day to day services and facilities, and is capable of successfully integrating with and complementing the existing community.

Large sites, like the Sustainable Urban Extension, have the 'critical mass' to provide for much needed new infrastructure. They can be positive for local communities, bringing real and tangible benefits. The proposed Sustainable Urban Extension could provide a range of benefits and opportunities - as set out in this Vision Document.

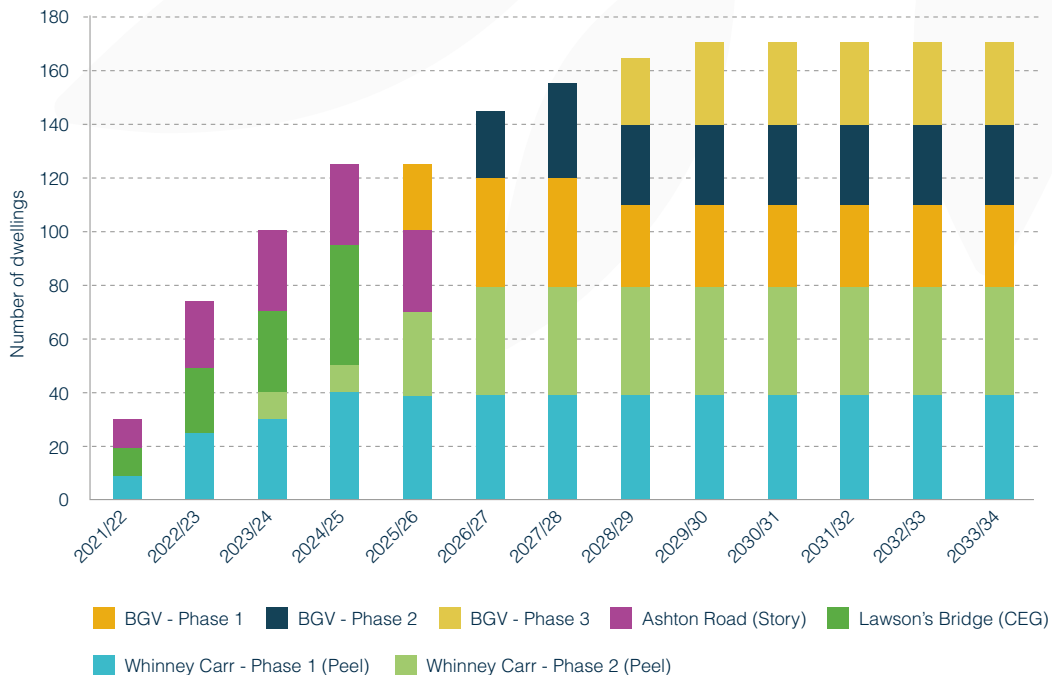


## Delivery

The Landowner Group has extensive experience in delivering large scale, strategic developments. They are supported by specialist teams with a proven track record in bringing forward major development proposals and are committed to deliver the Sustainable Urban Extension as part of an early phase of the overall BGV.

The majority of the proposed allocation site lies within the ownership or control of the Landowner Group and LCC and can be made available for immediate development.

The development will consist of a number of development phases. The involvement of several developers enables new homes to be delivered simultaneously from multiple outlets. Following the allocation of the site, and allowing for appropriate lead in time to secure necessary planning permissions and prepare the site for development, it is anticipated that the phased approach proposed could see significant delivery within the first five years of the plan period i.e. from 2021 onwards. LCC have acknowledged this potential and timescale in their draft Local Plan.



## Benefits

The South Lancaster Sustainable Urban Extension provides a unique opportunity to create an outstanding and sustainable community which enhances the local area and provides much needed new homes, recreation / leisure,

and employment opportunities. Its accessibility and synergy with neighbouring strategic sites can underpin sustainable growth in the area, whilst accelerating housing delivery.



**£170m**

**Construction Value**

(temporary jobs p.a. over the build period)



**£14.6m GVA**

**Economic Output**

(additional GVA p.a.)



**130 Jobs**

**Construction Jobs**

(temporary jobs p.a. over the build period)



**195 Jobs**

**Supply Chain Jobs**

(indirect / induced 'spin-off' jobs supported p.a.)



**£6.8m**

**First Occupation Expenditure**

(spending to make a house 'feel like home')



**£5.5m**

**Resident Expenditure**

(within local shops and services p.a.)



**235 Jobs**

**Supported Jobs**

(from increased expenditure in local area)



**£1.8m**

**Council Tax Revenues**

(p.a.)



**£5.7m**

**New Homes Bonus Payments**

(over a 4 year period)







**Barton Willmore on behalf of Story Homes**  
**Examination into the Lancaster District Local Plan**

**Matter 5**

**Representor ID: 106**

**Matter 5: Heritage and the natural environment**

**Main Issue: Have the DPDs been prepared in accordance with the relevant statutory tests and the policies of the NPPF**

*a) Do policies SP7, SP8, SG4, SG9, SG14, SG15, EC1, EC3, H3, H4, H5, H6, DOS1, DOS2, DOS3, DOS6, DOS7, DOS8, DOS9, DOS10, DM21, DM24, DM29, DM37, DM38, DM39, DM40, DM41, DM43, DM44, DM45 and DM46 provide for the conservation and management of the District's built and natural heritage in accordance with the policies of the NPPF?*

1. Story Homes wishes to note several concerns and clarifications regarding Policies H4, DM29, DM39, DM43 and DM44 which follow on from its Publication Draft submissions.

Policy H4 Land at Grab Lane (and Policy EN10)

2. Story Homes controls land at Grab Lane, East Lancaster. We would note that attached to our Publication Draft representations, our client submitted a "Development Framework Document" which included a masterplan, landscape strategy and site cross-sections. This information should be before the Inspector and copies can be made available if required. That Framework has been the subject of consultation with the Council, its Conservation Officer and Historic England.
3. As background context, land at Grab Lane has been included since the inception of the Local Plan. It was originally identified by the Council as a much larger Strategic Site, considered in its the 2012 SHLAA as having capacity for up to 1,200 dwellings. The Council recognises the potential of the location of East Lancaster being very accessible to the City Centre in one of its most sustainable locations. Story Homes never considered the Site to be able to accommodate 1,200 homes and the Council's strategy for the Site has evolved since, following several discussions with Story Homes.
4. As the Council rightly notes in its Matter 5 Statement at 5A.3, this site has been subject to a constructive and proactive engagement process with extensive dialogue, probably more so than any other site in the Plan. The proposed allocation has therefore been rigorously tested.

5. During the Draft Plan stage in 2017, the Council suggested a revised capacity of 450 homes and consulted upon that basis. Again, following further technical assessment, Story Homes did not consider this amount of development to be deliverable and several discussions were held with the Council to review the position. This resulted in the revised yield of 195 homes which Story Homes agrees with.
6. Sections 5F.6-5F.23 of the Council's Matter 5 Statement sets out further background, including reference to the Key Urban Landscape designation. That designation stems from the previous Local Plan adopted in 2004 and is based on even older evidence. Some 19 Key Urban Landscapes were identified pre- 2004 covering most of the Lancaster's urban area; it is not a designation that is specific to the setting of Ashton Memorial and Williamson Park at Grab Lane alone, but to multiple landscapes in and around Lancaster.
7. As noted in 5F.9 of the Council's statement, in 2012 Woolerton Dodwell were commissioned to provide a review of the Key Urban Landscapes (En\_LA\_02.7) that had effectively been carried forward via 'saved' Local Plan Policy E31. Woolerton Dodwell are critical of policy E31 and the justification for the old Key Urban Landscapes noting:

***1.6 However the reasons for the selection of the Key Urban Landscapes were not formally recorded by the City Council when the areas were originally identified. Consequently there is no clear evidence as to why these areas are considered to be important; such evidence is needed to underpin and justify their designation as Key Urban Landscapes.***
8. Woolerton Dodwell continued to provide its own assessment of Landscape Character of Grab Lane, finding the land is typical of other areas of land on the outskirts of Lancaster located on a drumlin field with similar landscape features i.e. hedgerows, hedgerow trees, field boundaries and woodland.
9. Woolerton Dodwell also provided a more detailed landscape assessment of Grab Lane (En\_LA\_02.4). That report identifies that the Site has potential for development on page 7, which states:

*Woolerton Dodwell*

*November 2012*

*7*

**POTENTIAL FOR DEVELOPMENT**

***1.19 Land at Grab Lane was identified through the City Council's 'call for sites' process as an area of land that could accommodate significant development. It is identified in the Council's Strategic Housing Land Availability Assessment (SHLAA 320), and is further identified by the Council as a potential site in the draft Land Allocations DPD.***

***1.20 Land at Grab Lane has potential for housing development that is likely to be characterised by two storey and possibly three-storey buildings, as detached and semi-detached units, terraces or low-rise apartment blocks, with associated gardens and open space, green infrastructure, parking areas, roads, signage and street lighting. Such development is to be considered as permanent. The distribution and layout of development is likely to be constrained by National Grid's wayleave requirements regarding the high-pressure natural gas underground pipeline that runs along the eastern margins of the site.***

10. Pages 8 and 9 of the report plus the appendices provide helpful guidelines on development areas and landscape mitigation. As such, it can be summarised that the report accepts that the site can be developed without harmful landscape impacts.
11. In relation to the setting of the historic assets, the Council commissioned Architectural History Practice to conduct a Setting Study, undertaken at the time when the Council was considering the site as having potential for 1,200 homes. Story Homes subsequently completed its own Landscape and Heritage Impact Assessment (undertaken by Graham Ives) as part of its Site promotion, which have informed the emerging designs.
12. All of this evidence was discussed with the Council, its Conservation Officer and with Historic England. On the 13th July 2016, a workshop was held with all participants to carefully review information and design options. This resulted in agreement over the development area at Grab Lane and strategies for any required mitigation. This is presented in the Development Framework Document attached to our client's Publication Draft representations.
13. As part of this process, Story Homes undertook pre-application advice with Historic England. Appendix 1 of this Statement is a letter from Historic England (dated 25th August 2016) setting out its position on the outcome of that process and comments on Land at Grab Lane. Noting the significant change in the quantum of development first envisaged by the Council to the now proposed 195 homes, Historic England state in its penultimate paragraph that it is now in a position to conclude that the Grab Lane site could be capable of sensitively designed development, without causing a high level of harm to the setting of the asset.
14. Story Homes is committed to working with the Council, its Conservation Officer and Historic England to agree detailed layout and designs once the allocation has been confirmed.
15. Separately, Story Homes has a few specific comments on the following DM Policies:

Policy DM29

16. Story Homes refers to its Publication Draft representations. The expectation in Policy DM29 for applicants of major development to use Design Panels is unsound. There are no such Design Panels established by the Council which equally has no appointed Urban Design team. This part of Policy DM29 should be deleted.

Policy DM39

17. Story Homes has raised concerns regarding Policy DM39. The second sentence of this Policy is too simplistic and the Policy should be amended to reflect paragraph 196 of NPPF (the “less than substantial harm” test).

Policy DM 44.

18. The second part of Policy DM44 is unsound as it is not effective. It represents a generalised strategy of the Council. Applicants cannot be expected to look throughout the district for tree planting opportunities when they advance site specific projects.

*b) Is policy DOS5 imprecise and unduly restrictive in respect of this open space?*

19. No comments from Story Homes.

*c) Are policies EN1 and EN2 consistent with the NPPF and necessary given the policies in the Development Management DPD which deal with these matters?*

20. No comments from Story Homes

*d) Is there any inconsistency between policy EN5 of the Strategic Policies & Land Allocations DPD and policy DM4 of the Development Management DPD?*

21. Whilst Story Homes does not raise any objections to Policy DM4, we wish to note that the Policy does not overcome our client's objections to the soundness of Policy SP2 and SP6 which provide no guidance on the amount of development at Sustainable Rural Settlements.

*e) Is policy EN7 of the Strategic Policies & Land Allocations DPD necessary given policy DM45 of the Development Management DPD?*

22. No comment from Story Homes.

*f) Can the Council clarify the justification for policies EN8, EN10, EN11 and SC2 (with regard to Freemans Wood, sites adjacent to the canal network, the River Lune, Over Kellet Craggs and the definition of extensive tract of land)?*

23. In the context of EN10, please refer to Story Homes comments under question a) above.

*g) Would policy SC4 prejudice any expansion plans for Lancaster University?*

24. No comment from Story Homes.

*h) Is policy SC5 necessary given other policies cover open space requirements and is it legally compliant with regard to minerals safeguarding?*

25. No comment from Story Homes.

*i) Should policy DM50 specifically relate to the Arnside and Silverdale AONB in respect of equine related development?*

26. No comment from Story Homes.

## **Appendix 1 – Letter from Historic England**

**MATTER 5**

**APPENDIX 1**

**LETTER FROM HISTORIC ENGLAND**





Historic England

NORTH WEST OFFICE

Mr Dan Mitchell  
Barton Willmore  
Tower 12  
18/22 Bridge Street  
Spinningfields  
Manchester  
M3 3BZ

Direct Dial: 0161 242 1416

Our ref: PA00392506

25 August 2016

Dear Mr Mitchell

**Pre-application Advice**

**LAND AT GRAB LANE, LANCASTER**

The suitability of the parcel of land, known as the Grab Lane site, for housing has been the subject of discussion with Historic England (formally English Heritage) for a number of years. Situated between the M6 and Fenham Carr Lane, the land has been previously identified by the Local Planning Authority as a potential location for a sizable housing allocation as part of the Local Development Framework.

Given the sites position at the base of the landscape which surrounds a grade I listed building, the Ashton Memorial, we have previously advised that consideration must be given to the potential impact of developing the site on the setting of the high grade asset. As a result a Setting Study was commissioned by Lancaster City Council (LCC) from AHP in 2012. The Setting Study concluded that *'Development on these fields will have a negative impact on these attributes; instead of undeveloped fields, the foreground in views from the east will be intruded into by the clutter of houses, roads, lighting and traffic.'* It is perhaps unsurprising then, that when considering the whole of the Grab Lane site for housing development, we have sustained notable concerns over its suitability.

It is in this context that Story Homes have been reassessing the Grab Lane site and considering the quantity of development that the site could accommodate. When first put forward as a potential development site in 2012, a figure of 1,200 dwellings was suggested by LCC. At the point that the AHP report was written, a figure of 450 dwellings was proposed. However, further investigations and analysis has been undertaken which indicates that only a substantially reduced area of the land is actually capable of development, resulting in a figure of just under 200 hundred dwellings now being proposed.



SUITES 3.3 AND 3.4 CANADA HOUSE 3 CHEPSTOW STREET MANCHESTER M1 5FW

Telephone 0161 242 1416  
HistoricEngland.org.uk



*Historic England is subject to the Freedom of Information Act 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All Information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.*

*Historic England will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.*



Historic England

## NORTH WEST OFFICE

Given that the nature of the proposals we have been asked to consider are substantially altered from those initially put forward, with a reduction of nearly 1,000 units, we have re-evaluated the potential impact of the concentrated scheme on the setting of Ashton Memorial.

The land identified as developable is located around Grab Lane itself, which is situated at the lowest point of the rolling landscape. As a result a significant portion of the undeveloped fields identified in the AHP study as forming an important aspect of the setting of the asset of the Ashton Memorial and by Turley's report as allowing the wooded landscape of Fenham Carr Wood to remain a distinct feature, would remain undeveloped.

As our previous concerns were based around the urbanisation of these fields and the loss of the contrasting landscape which gives prominence to the woodland surrounding the Memorial, the fact that these fields would remain largely open, greatly reduces the identified harm to the setting of the grade I listed building. We are therefore in a position to conclude that the Grab Lane site could be capable of a more limited and sensitively designed development, without causing a highly level of harm to the setting of the asset (NPPF 132).

### Next Steps

These comments represent a view as to the principle of developing an area of the Grab Lane site. I have not considered the detail of the proposals, as my understanding is that further work is envisaged on that matter. We would be willing to provide further advice on more detail proposals once they have been established and we would encourage further discusses to be undertaken between ourselves as is appropriate.

Yours sincerely

Marie Smallwood

Inspector of Historic Buildings and Areas

E-mail: [marie.smallwood@HistoricEngland.org.uk](mailto:marie.smallwood@HistoricEngland.org.uk)



SUITES 3.3 AND 3.4 CANADA HOUSE 3 CHEPSTOW STREET MANCHESTER M1 5FW

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