

Hearing Statement Lancaster Local Plan Examination in Public

CBRE on behalf of Lancaster University

Representor ID: 148

2nd April 2019



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APPENDIX 1: Plan of University Estate

Introduction

- 1.1 CBRE Ltd (“CBRE”) has been instructed by Lancaster University to prepare a Hearing Statement and appear at Hearing Sessions into the Lancaster Local Plan (2011-2031). CBRE acts on behalf of Lancaster University in relation to its wider estate in Lancaster, including the development of the Bailrigg Campus and wider landholdings, which sit within the proposed ‘Lancaster South Broad Location for Growth’ under proposed Policy SG1.
- 1.2 Lancaster University is a major investor and economic driver in the District and in Lancaster South, where the core University campus is located, and has a significant positive influence on the economy of Lancaster and the wider region. The University has an emerging growth and expansion strategy during the forthcoming Plan Period, which will realise a vision to significantly expand the reach of the University and enhance its status/reputation as a world class higher education institution.
- 1.3 This Hearing Statement follows representations submitted to the Publication Version of the Local Plan including the Strategic Policies and Land Allocations DPD (“LADPD”) and the Development Management Review DPD (“DMDPD”). It should be read alongside these representations, but updates and clarifies the Universities position in relation to the Inspector’s focussed Matters, Issues and Questions (“MIQs”), and identifies the key areas where modifications are requested.
- 1.4 Lancaster University supports Lancaster City Council’s (“LCC’s”) overall approach to its Local Plan which seeks to meet the ambitious growth aspirations of the District, and in particular in Lancaster South, and is supportive of the Local Plan, in principle, subject to a number of suggested modifications.
- 1.5 The University’s previous representations, including submissions to the emerging Lancaster South Area Action Plan (“AAP”), have sought to support the University’s long-term objectives by seeking to ensure that the future planning framework is supportive of the aspirations of the University, including by:
 - Safeguarding the University’s existing community ecosystem at its evolving Bailrigg Campus estate and the Lancaster University Health Innovation Campus (“HIC”), which must be sensitively protected to maintain balance at one of the UK’s most successful University campus-based institutions; and
 - Ensuring that the emerging planning policy framework has the flexibility to underpin the University’s future plans for the sustainable growth of its wider campus estate, including the HIC, land it has acquired to the east of the M6 and by providing a policy framework that supports the delivery of high quality student accommodation. A plan of the University’s wider campus ownership is included at **Appendix 1**.
- 1.6 This Hearing Statement responds to the MIQs that are relevant to the University, including:
 - **Matter 2** (Housing): Question f)
 - **Matter 3** (Spatial Strategy): Question a) and Question b)
 - **Matter 4** (Economic Development): Question a) and Question b)
 - **Matter 5** (Heritage and the Natural Environment): Question g)

Matter 2: Housing

Question 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)?

Lancaster University Context

- 1.7 The University has prepared a University Masterplan (2017-2025), which anticipates that, by 2025, the University will have a student population of c. 17,000 students, representing a growth of circa 4,000 students and an accommodation increase of circa 3,000 rooms. This is based on evidence prepared as part of a Lancaster University Residential Accommodation Strategy ("RAS"), which was prepared in 2016/2017 and sought to project future student numbers and accommodation demand. The University is reviewing its RAS, which will inform the demand for student accommodation both on and off campus.
- 1.8 An ongoing update of the RAS will set out type of demand and growth that will underpin the University's future student accommodation requirements. The strategy includes considerations regarding the growth in student numbers anticipated by the University, wider macro socio-economic and political factors (such as Brexit and demographic fluctuations), existing on-campus and off-campus purpose-built student accommodation and recently consented city centre student accommodation schemes.
- 1.9 The 'student experience' at Lancaster University is of paramount importance in a competitive higher education market, underpinning the reputation of the University in providing high quality, affordable on-campus accommodation. The University has an established guarantee to all first-year students that they will be accommodated in on-campus accommodation, enabling them to have a safe and full first year university experience by being placed into one of the 'colleges'. This 'accommodation guarantee' is considered to be one of the pillars of success for the student experience at Lancaster, for which the University is "triple top 10" ranked in the UK; it is therefore a critical contributor to the University's successful recruitment and league table position.
- 1.10 It is critical that the emerging Plan is flexible and responsive to demand for student accommodation provided by the University, and conversely seeks to prevent the uncontrolled supply of inappropriate student residential development, particularly where it is not within the University's estate, is outside of proposed student allocations and which may have a detrimental impact on traditional housing areas in South Lancaster.

Policy DM7: Student Accommodation

- 1.11 The University is of the view that Policy DM7, as currently drafted, does not carry sufficient policy weight to require student residential proposals on non-University or non-allocated sites to be assessed against an appropriate need / demand position.
- 1.12 The introductory text to Policy DM7 (specifically para. 5.66) provides a limited acknowledgement of LCC's intention to undertake a demand/need based approach to understand the impact of proposals on local housing markets – however, it is considered that this does not go far enough. It is recommended that the requirement to demonstrate demand is also formally included in Policy DM7. There is well-established case law¹ which states that supporting (justification) text is descriptive and explanatory to the interpretation of a relevant

¹ R (on the application of Cherkley Campaign) v Mole Valley District Council [2014] EWCA Civ 567 – as referenced in **R (o.a.o. Khan) v London Borough of Sutton** [2014] EWHC 3663

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policy but ultimately does not form part of the policy itself and cannot 'trump' policy. Therefore, Policy DM7 should provide the specific policy basis for the assessment of particular student accommodation applications on the basis of need / demand.

- 1.13 The University supports the requirement for accommodation providers to sign-up to the Lancaster University Homes Standard (or any successor) on completion of development, to ensure that the quality and management of student housing is adequately controlled in the District. The Lancaster University Homes Standard details the terms and conditions that applicants and members sign up to when they register with or renew membership of the Lancaster University Homes Accreditation Scheme. Only accommodation accredited by Lancaster University Homes is approved by Lancaster University, the University of Cumbria and Lancaster City Council.
- 1.14 To support the University's position, it is recommended that Policy DM7 could be amended as follows²:

Policy DM7: Purpose Built Accommodation for Students

Proposals for new purpose built student accommodation will be supported where they satisfy the requirements of all relevant policies in the Local Plan and meet the following criteria:

- I. *Are located ~~on~~ within a University campus estate, within or directly adjacent to Lancaster city centre and not on allocated housing sites that would deliver residential development (unless stated as part of a mixed use development within the specific site allocation policy development principles of the Strategic Policies and Land Allocations DPD);*
- II. *Development proposals are appropriate to the character of the local area in terms of design, layout and materials used;*
- III. *Ensuring suitable amenity standards in accordance with criteria set out in Appendix G;*
- IV. *Proposals demonstrate that there will be no unacceptable impact upon residential amenity in the surrounding area through issues such as increased noise and disturbance;*
- V. *High density developments will be encouraged but only in locations where they are compatible with the existing townscape;*
- VI. *Proposals demonstrate that they would not lead to an unacceptable increase in anti-social parking in the surrounding area;*
- VII. *Proposals are designed to be safe and secure for their occupants whilst respecting the character and permeability of the surrounding area; and*
- VIII. *To ensure students can be housed in quality accommodation all new development will be required on completion to sign up to the Lancaster University Homes Standard or any future successor.*

Student residential applications outside areas within the University estate or in areas and not benefiting from an allocation that supports student residential development must demonstrate, in consultation with Lancaster University, Cumbria University and Lancaster City Council; sufficient need / demand for student accommodation, taking account of existing student residential commitments across the district and University accommodation strategies.

Self-contained 'warden's accommodation' created as part of proposals for new student accommodation where it has been demonstrated necessary, will be

² Policy DM7, DMDPD, October 2018 Suggested Modifications (CBRE Changes suggested in RED)

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conditioned for use by the warden and are therefore not required to contribute towards affordable housing.

Proposals for student accommodation should, through its layout and design, be adaptable so that it provides opportunity to be used flexibly for alternative future uses.

Such proposals may be supported where they would provide an appropriate standard of self-contained accommodation (in accordance with Appendix G of this DPD) in a sustainable location and would accord with all other relevant planning policies.

Matter 3: Spatial Strategy

Question 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?

- 1.15 The University considers that, in principle, the Local Plan spatial strategy is soundly based and is supportive of LCC's broader economic growth agenda and, in particular, its aspirations for the growth of Lancaster South (Policy SG1).

Policy SP4

- 1.16 The University supports specific recognition of the University and higher education establishments as a major driver in delivering sustainable economic growth in Lancaster. Reference to the HIC as a priority location for growth is strongly supported.
- 1.17 The University, however, considers that Policy SP4 should include additional detail of the specific University related economic and employment opportunities, including specific reference to 'educational, University-related and health related business uses' to recognise the close relationship between the site and the University in terms of job creation and developing opportunities for commercial enterprise and partnership. Spin-off from University research, including opportunities for small and medium enterprise business formation and growth, will drive jobs and skills within Lancaster to the benefit of the wider regional economy.
- 1.18 The University also considers that Policy SP4 should fully recognise the growth potential of Lancaster University within Lancaster South, particularly in terms of the University's growth strategy to expand outside of its current Bailrigg Campus; including at the HIC and on land around Forrest Hills. These areas are within the University's campus estate and are important to the future expansion of University operations. It is recommended that Policy SP4 is amended to support [extract from Policy SP4, Bullet Point 6]³:
- *Sustainable growth at the district's higher education establishments, including Lancaster University, University of Cumbria and Lancaster & Morecambe College. Improving the opportunities for academic learning and improving the presence of the universities within Lancaster City Centre and **within the Lancaster University Estate (including land at the Lancaster University Health Innovation Campus and the University Estate to the east of the M6 including Forrest Hills).***

Question 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?

Policy SG1 (Lancaster South / Bailrigg Garden Village)

- 1.19 The Lancaster South Broad Location for Growth includes the University's existing and proposed future campus area in Lancaster South, including Forrest Hills/land south of Hazelrigg Lane, the main Bailrigg Campus and the new HIC.

³ Policy SP4, LADPD, October 2018 Suggested Modifications (CBRE Changes suggested in RED)

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- 1.20 The University supports the principle of the Broad Location for Growth and is fully engaged in the preparation of a future AAP, which will guide the future development of Lancaster South and the Bailrigg Garden Village.

Safeguarding the University Ecosystem

- 1.21 The core University campus comprises the original Bailrigg site where the focus of education and student accommodation development, commercial and leisure uses is located. The University's core campus has evolved into a self-sustained collegiate community that comprises a balanced ecosystem that astutely blends teaching, learning, social spaces, retail, accommodation and sports facilities to enhance the student experience. This campus environment is exceptionally successful and is a key reason why the University is one of the highest ranked in the UK and globally.
- 1.22 The development of Lancaster South has the potential to impact on the University campus through new residents, additional vehicle movements, a new local centre and increased provision of community, sports and social developments. The campus is a delicate ecosystem that provides a community oriented environment for its students and, as such, any development within the surrounding area must be balanced and sensitively considered against the existing campus hierarchy. Therefore, the delivery and phasing of development within Lancaster South, and the preparation of any AAP, must ensure no detrimental impacts to the current / future operation of the A6 and a high quality built environment in terms of layout, design and materials used.
- 1.23 Whilst the University is supportive in principle of the development of Lancaster South and the Bailrigg Garden Village, it is important that planning policy is developed to protect and enhance the University experience.

Supporting Future Expansion

- 1.24 The University has expanded its estate to include land to both the east and west of the M6, within the Lancaster South Broad Location for Growth. For clarity, the extent of the University's Estate is illustrated in **Appendix 1** and includes:
- **The Bailrigg Campus** - including the University's core campus and land for expansion/the development of student accommodation and other ancillary University uses;
 - **The HIC** (allocated under Policy SG2) - which has hybrid planning consent under which development has lawfully started on site; and
 - **East of the M6 / Forrest Hills** (including the Forrest Hills Conference Centre and associated land) - which is important to the long-term aspirations of the University.
- 1.25 The University's Bailrigg Campus and its wider landholdings are integral to its future growth strategy and has the potential to bring forward a range of complementary and University-related uses including:
- Teaching space and faculty expansion;
 - Additional visitor accommodation;
 - Student accommodation;
 - Enhanced conferencing facilities;
 - University related leisure;
 - Limited residential development (for visiting academics families etc.); and

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- Ancillary retail, and food and beverage facilities.
- 1.26 The context for this future expansion is set out in the University’s Masterplan (2017-2027), which has been endorsed by the University’s full Council and has been provided to LCC. The University considers that a better reflection of its future growth aspirations in planning policy will:
- Support the future growth of the University as of a key driver of Lancaster’s economy and as one of the top University’s in the UK and internationally;
 - Safeguard and support the areas of Lancaster South that are under the University’s control and planned for University related expansion;
 - Ensure that that the University’s expansion plans can be sympathetically integrated with but not intrinsically tied to the delivery of the wider Bailrigg Garden Village and future AAP;
 - Allow the University to bring forward a range of uses that would make a positive contribution to wider delivery of development in Lancaster South in terms of residential and employment growth; and
 - Support the delivery of transport infrastructure and infrastructure improvements which provide a significant opportunity to not only help improve Hazelrigg Lane for the majority of users but also facilitate the opportunity for (semi) direct access to the Forrest Hills site. The expansion of the University estate will also serve to improve east-west links across the M6.

SG1: Policy Recommendations

- 1.27 To safeguard the University’s core campus and to support recognition of the University’s wider campus in advance of the delivery of the AAP, Policy SG1 should recognise the importance of the University as a part of the Lancaster South allocation and reflect the aspirations of the University in relation to its campus expansion, the mix of uses proposed and potential for the University to prepare a masterplan or planning framework to guide its future development. As such, the following changes to Policy SG1 are proposed⁴:

Policy SG1: Lancaster South Broad Location for Growth – (Inc. Bailrigg Garden Village)

The Council has identified a broad location for growth in South Lancaster, including development of 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 and wider University related expansion.

Key Principles of the Garden Village

The Council has defined a range of principles which will be at the very core of the planning and development for the Garden Village which will be explored in more detail via the forthcoming Development Plan Document (DPD) for this area. These principles include:

⁴ Policy SG1, LADPD, October 2018 Suggested Modifications (CBRE Changes suggested in RED)

Matter 3: Spatial Strategy

1. *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.*
2. *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.*
3. *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 to long term phases of the Local Plan period.*
4. *4. 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.*
5. *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 Garden Village and South Lancaster and also Galgate and investigate the opportunities for a new country park.*
6. *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.*
7. *The sympathetic masterplanning of new facilities and growth within the campus of Lancaster University for a range of educational facilities, ~~and~~ student accommodation, visitor accommodation and ancillary uses located primarily at the Bailrigg Campus, the Lancaster University Health Innovation Campus and on the University Estate to the east of the M6 including Forrest Hills.*
8. *Safeguarding the ecosystem that exists at Lancaster University's Bailrigg Campus, by ensuring that the development of Lancaster South and the Bailrigg Garden Village does not impact upon the delicate balance that the University has established at the Bailrigg Campus, in terms of physical and built development, design, layout, proposed type and scale of uses (including any new local centre and commercial uses), transport impact/movement and landscape/environment.*
9. *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.*
10. *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.*

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11. 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.
12. 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.
13. 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).
14. Seek to encourage economic growth within the Garden Village to create new jobs, investment and economic opportunity.

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 International designated site would be adversely affected by development either alone or in combination with other proposals, as per the requirements of Policy EN9 of this DPD. In view of the potential for likely significant effects as a result of this allocation the requirements of appendix D must be 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 the infrastructure required for the area) or **impact upon Lancaster University's campus ecosystem** will not be permitted beyond that which has already secured planning permission and proposals which are sited within the **developed footprint of Lancaster University's wider estate, including the Bailrigg Campus, the Health Innovation Campus and the University Estate to the east of the M6 (including Forrest Hills)**.

- 1.28 In summary, the protection and the future development of the University estate is something that it is critical that the University is able to pursue, outside of the proposed AAP, given its relative policy infancy.

Policy SG2: Lancaster University Health Innovation Campus (HIC)

- 1.29 Policy SG2 relates to the new HIC under which the University fully supports the acknowledgement of the campus as a strategic site within the emerging Local Plan.
- 1.30 However, the HIC has secured hybrid planning permission (Ref: 16/00117/VCN) across the site, which has now been lawfully implemented. It is considered that Policy SG2 should fully reflect this lawful planning position and remove reference to the preparation of a masterplan and the imposition detailed matters which are not considered to be appropriate given the

Matter 3: Spatial Strategy

extant planning status of the site. Matters of detail, as part of future reserved matters applications, should be considered against the existing policies of the LADPD, the DMDPD and the future AAP. As such, it is recommended that Policy SG2 is amended as follows⁵:

Policy SG2: Lancaster University Health Innovation Campus

The Council ~~will~~ supports the development of a high quality Innovation Campus in the Lancaster South area for a range of knowledge-based and research businesses that provides strong linkages with its position in the Bailrigg Garden Village and in relation to Lancaster University, which is directly south of this site.

Given the site's location within the Garden Village, ~~further~~ new development should seek investigate how the development principles as set out in Policy SG1 of this DPD can be addressed. This policy approach applies until such a time that ~~a masterplan for the Lancaster University Campus or the Bailrigg Garden Village Action Plan~~ DPD provides more updated guidance on the matter.

Development proposals for this site should be brought forward which builds positively on ~~the principles of the extant hybrid planning consent and~~ first phases of development for the Campus, which began in 2018. ~~Proposals should seek to address the following matters:~~

~~[Delete all matters proposed]~~

Development proposals should give due consideration to all other relevant planning policies, particularly those contained within the Development Management DPD (DM DPD).

⁵ Policy SG2, LADPD, October 2018 Suggested Modifications (CBRE Changes suggested in RED)

Matter 4: Economic Development

Question a) - Would the approach of Policies SP4, EC1, EC2, EC3, EC5, DOS4, DOS5, DOS9 and DM14 provide flexibility and choice for employment land within the District in line with the Employment Land Review?

Policy EC2: Future Employment Growth

- 1.31 The University supports reference in Policy SP2 to the HIC as a future location for employment growth. However, it is considered that additional reference should be made within the policy text to “*ancillary education-linked uses*” given the strong linkages promoted between the site and the University. The University notes that the LADPD Suggested Changes Version (October 2018), suggests an amendment to this effect, which is welcomed and strongly supported.

Question e) - Would policy DM23 preclude hotel development outwith a defined town centre?

- 1.32 Policy DM23 as currently drafted directs hotel development to central (city centre) locations in accordance with the NPPF sequential approach. However, the University considers that there are ‘location-specific’ opportunities for appropriate visitor accommodation outside of the city centre, particularly to cater for university staff, visitors, conference guests and academics, linked to the University’s campus.
- 1.33 As currently drafted, the policy could preclude the delivery of visitor accommodation within the Lancaster University Campus and its wider estate, particularly given the policy infancy of the Lancaster South Broad Location for growth (Policy SG1) and proposed AAP. It is critical to the University that its aspirations for growth are not constrained by the policy framework and that the emerging Local Plan allows the University to deliver the ancillary and location specific accommodation that is required to support ongoing operation and expansion.
- 1.34 The University is keen to invest in a high-quality hotel and conferencing facility as part of the campus offer, of which there is currently no provision. The University currently has 80 ‘guest rooms’ available which are well occupied throughout the year. These rooms are not of the quality expected by visiting academics, business visitors and families; and do not provide the type or quality of visitor accommodation to support a top tier University. There is also an opportunity for the University to support latent demand for events in Lancaster – for example, the University is expected to provide 1,500 beds to support the Corporate Games, which will be hosted in Lancaster in 2020.
- 1.35 Opportunities for visitor accommodation development exist within the University estate, including at the Bailrigg Campus and at Forrest Hills - which could release current guest rooms for student use. It is critical that the policy framework supports expansion in advance of more detailed policy being brought forward as part of the AAP. As such, it is recommended that Policy DM23 is amended as follows⁶:

Policy DM23: Visitor Accommodation

Hotel Accommodation

Proposals for hotel development will be supported where they are located within a defined town centre, as set out in the Local Plan Policies Map or are in accordance with the relevant policies within the Strategic Policies and Land Allocations DPD. Proposals for ‘location-specific’ hotel development will be supported within the Lancaster University Estate, to accommodate visitation and support University growth, where demand for visitor hotel accommodation is demonstrated.

⁶ Policy DM23, DMDPD, October 2018 Suggested Modifications (CBRE Changes suggested in RED)

Matter 4: Economic Development

Proposals that involve the development of hotel uses located outside of the defined town centre boundaries or University Estate, and which are not in accordance with relevant policies within the Strategic Policies and Land Allocations DPD, will be expected to demonstrate, through the use of the sequential test, that no sequentially preferable sites exist, whether this be in a town centre or, in the case of out-of-centre proposals, that no preferable edge-of-centre locations exist. Flexibility should be demonstrated in relation to format and scale of proposals. All proposals for hotel development will be expected to demonstrate that the location is accessible to a range of transport modes and public transport.

Matter 5: Heritage and the Natural Environment

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

- 1.36 Policy SC4 identifies 'Lancaster University and the Eastern Fringes of Lancaster' as a greenspace network that should be protected from development. This area isn't identified on the Local Plan policies map. Moreover, the opportunity to expand the developable area of campus is something that is being investigated by the University as a necessity to provide sufficient land for the growth ambitions over the Plan Period.
- 1.37 Notwithstanding the maintenance of a campus environment and the character of the University, it is essential that a flexible policy framework is implemented that supports appropriate development within the University estate. It is suggested that reference to this greenspace network is removed from Policy SC4 and considered in more detail as part of the Lancaster South AAP.
- 1.38 The University notes that in the LADPD Suggested Changes Version (October 2018), LCC has recommended the removal of 'Lancaster University and the Eastern Fringes of Lancaster' from Policy SC4. The University strongly supports this proposed amendment.

Appendix 1: Plan of the wider Lancaster University Campus Estate

