

Our Ref: 904SBCGLANCS

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Dear Kim

Re: Homework Note re SHELAA Process

We respond to the Homework Note prepared by Lancaster City Council regarding the SHELAA process and the way our site, Land at New Quay Road Lancaster, is assessed in that document.

The 2018 SHELAA sets out this site as reference 370.

The assessment contained within the SHELAA concludes the following main points,

1. Site plan is as in the previous SHLAA. This it will be noted includes the LA playing fields on Willow Lane as well as the representation site.
2. Site is classified as "*Greenfield*", ignoring the clear historic evidence the site is partly brownfield, partly greenfield.
3. In response to whether the site located at a "*Sustainable Settlement*", the document says "*no*", but the site is on the edge of Lancaster, the largest and most sustainable settlement in the District.
4. There are continual policy references to Open Space needs and assessments, but the document is supposed to be "*policy off*", without such considerations affecting the analysis at this stage.
5. Under "*Current Use*", the site is described as "*woodland*". A site inspection will clearly demonstrate the majority of the trees on site are self-seeded and not woodland quality. Also, large areas of the site are dense bramble and undergrowth, not woodland. The centre of the site is open land, yet this is not described at all.

6. The *"Site Description"* is stated to be *"currently playing fields and a woodland, Freemans Wood"*: but as set out above, only in part, and there is no reference to central part of the site. The references to Freemans Wood are misleading, as historic mapping shows this is a linear woodland to the southern edge of the site only. The playing fields are, of course, on the local authority land at Willow Lane, not on the representation site.
7. The *"Development Assessment"* section notes the following points,
 - a. *"large proportion of the site is protected by TPO, whilst remaining part is football pitches"*. No reference again to the open parts of the site and the large amount of scrub. The DC process is able to consider the merit of individual trees within the site as part of the application process.
 - b. *"Evidence base indicates that the woodland and playing fields should be enhanced to meet local needs"*. There is no indication where in the evidence base this is set out. The plan makes no attempt to move such considerations on with a positive allocation in any event. The SHELAA is supposed to be Policy Off, however, so such considerations do not apply at this stage.
 - c. *"Site is isolated from services"*, the SHELAA is not specific which services it is referring to. However, the submitted application currently under consideration shows this not to be the case so far as utility/ drainage is concerned (reports submitted). The site is of course next to a substantial area of existing housing and an employment area, which has a host of community services within easy walking distance, primary school, health services, shops, sports facilities etc. In addition, the area is the focus of much recent housing development and continues to be so. The centre of Lancaster is within walking distance.
 - d. *"It is not considered to be a suitable location for residential development"*. This statement is not understandable, the site is next to a local plan allocation for housing, close by recent new housing of scale and an existing community. The site is,
 - i. located on the edge of main urban area.
 - ii. walkable to Lancaster town centre / trains / buses / facilities etc.
 - iii. near to local bus routes.
 - iv. near to local schools / shopping / services etc.
 - v. with other new housing close by.
 - vi. with infrastructure available.
 - vii. the site, the council says, is well enclosed, and
 - viii. the adjacent site (employment) is allocated for residential in plan (supported by the SA). Even with employment on the site however, noise / AQ / traffic are acceptable (as shown in the planning application).

8. With regard to *"Suitability"* the SHELAA states the site is RED, meaning unsuitable due to the following reasons,
 - a. *"site is isolated"*, but it is on edge of built up area, next to an allocated site.
 - b. *"off a no through road"*, as is the adjacent housing allocation and other completed residential developments. This is no bar to development here in principle.
 - c. There are repeated references to unspecified parts of the evidence base to open spaces and woodland to meet local needs, but the document is intended to be *"policy off"* in its approach. In any event, there is no shortage of open space in the Lancaster area, as evidenced in the Open Space Assessments within the evidence base. The site is of course, on the edge of the built up area, so very close to extensive open land and recreational areas.
 - d. *"location and value as open space, not considered suitable for residential development"*, the sites location is as set out above sustainable and the same as the allocation for housing on the adjacent site: again the SHELAA is supposed to be a *"Policy off"* document, yet reliance is made of policy considerations to restrict development.
9. With regard to *"Achievability"*, the SHELAA states the site is AMBER, meaning it could be achievable with more information (now submitted as part of the application and in representations to this plan).
 - a. *"issues that constrain development include.."*, TPO see above: playing fields (not affected as these are on the council land), woodland and open space value, see above: remediation is required, but so what? Development can bring remediation to the site, refusal to develop means the site remains in its current state. This is a reason to develop, and confirms part of the site is brownfield.
 - b. But the SHELAA does show, in its wording, an element of development could be accommodated on the site. It raises that the adjacent employment may depress values on the site, but there is no evidence of this and the new housing in this area has been built adjacent to such employment uses with no such issues arising.
10. With regard to *"Availability"* the SHELAA states this to be AMBER, meaning with further evidence the site could be available. This evidence is now available, in the form of the recent application and these representations.

With all of this inaccurate and partial information contained in the SHELAA for this one site, the validity and veracity of the SHELAA process must be called into serious doubt. It is clear that a thorough consideration of just one site shows the SHELAA analysis to be deeply flawed and misleading, with a predetermined policy presumption that the site is required for open space / protected for open space even though this is a Policy Off document (even though the site we are promoting excludes the playing fields in any event).

The analysis if done properly would demonstrate,

1. Part brownfield.

2. Edge of settlement / sustainable location
3. Contaminated, in need of remediation.
4. Open areas of land on the site already, and DC process can assess value of blanket TPO on individual trees.
5. Services / infrastructure are available.
6. Adjacent to site proposed as housing in the local plan.

Thus, this reinforces our representations that the urban capacity is not properly assessed nor fully exploited in this plan. As such the process for assessing "*exceptional circumstances*" is badly grounded and **the plan should not proceed without a full re-assessment of the capacity of the urban areas**. The capacity led approach to the setting of housing targets in the plan is of course affected by this basic miscalculation.

Yours sincerely

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cc Ben Pycroft