

SATNAM PLANNING SERVICES

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Kim Russell
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by email only: programmeofficer@lancaster.gov.uk

18 April 2019

Dear Kim,

Re Satnam Investments Ltd, Lune, Lancaster.

I write further to the proposed policy wording set out by the Council regarding an early review of the plan if housing supply is not delivered as currently envisaged by the Council in this plan.

You will of course be aware of our considerations regarding the housing strategy of the plan in any event, and we enclose a further letter from Mr Pycroft dealing with the latest developments in that regard. See HD22.4

We consider there is a fundamental issue here as far as the principle of an early review of the plan is concerned.

Lancaster is not a large urban authority with vast amounts of brownfield land available for development. Nor is it a rural authority that is unaffected by green belt considerations. In addition this is not an authority that seeks to establish safeguarded land, excluded from the green belt for future development needs.

This is an authority seeking to review and establish a green belt boundary that will endure for the life of the plan and beyond in line with government guidance (both 2012 and 2019 Frameworks advise thus). Further this plan brings into play designations such as Local Green Space which affect land in the same way as green belt. This is a local authority that claims (although we dispute this) that urban capacity is fully exploited.

So in the circumstances of an early review of the plan due to the (we would say foreseeable) failure of the plan strategy to deliver the required amount of housing, the inevitable consequence of this would be to begin another review of the green belt and LGS areas within 5 years of the adoption of

the current boundaries, totally against advice past and present (and most probably future). The authority on its own evidence base would have no alternative.

We say therefore, it is incumbent on this plan to *"get it right"* and to assess properly and thoroughly the capacity of the urban areas, the delivery profile of the sites proposed for allocation and, critically, the adequacy of the proposed OAN. To leave this to a future date is not an option for this plan.

In essence therefore, we agree the policy is required as the plan has inherent uncertainty regarding the adequacy and certainty of housing delivery. **But this does not remove the requirement to call for a halt to this plan and for the Council to properly assess urban capacity, proposed housing sites, omission sites and future resilience of green belt and LGS boundaries.** This is not able to be properly or adequately done through the Modification process, the reassessment and subsequent changes required are too great.

We are of course present at the Examination on the 26th April and can speak further on this topic at that stage.

Yours sincerely



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Attachment (Emery Planning letter 18.4.19)

cc Ben Pycroft See HD22.4