

#### Examination of the Lancaster District Local Plan Supplementary Hearing Statement on behalf of J and S Lamb (Representor ID 107)

Matter 3	Spatial Strategy
Question (a)	Is the Settlement Hierarchy soundly based?

25<sup>th</sup> April 2019

- This supplementary submission is made in response to the evidence referred to by the Council in the discussion of Matter 3 Question (a) concerning our clients' objection to the exclusion of Glasson Dock as a Sustainable Rural Settlement in Tier 3 of the Settlement Hierarchy set out in Policy SP2 of the submitted plan.
- 2. The Council informed the Examination that notwithstanding the identification of Glasson Dock as a sustainable settlement in the Interim Sustainable Settlement Review [Ho\_SSR\_02.1], it was excluded from Tier 3 of Policy SP2 on the basis of 'significant areas of flood risk which surround the village' [Ho\_SSR\_02.2]. The Inspector's attention was drawn to the flood zone layer of Map 88 of the Level One Strategic Flood Risk Assessment of 2017 [En\_SFRA\_01.1].
- 3. The on-line mapping accompanying the Level One Strategic Flood Risk Assessment is interactive. The <u>flood zone</u> layer of Map 88 is separate to the <u>flood risk</u> layer and the <u>flood management</u> layer and should not be used to misinterpret and overstate the level of risk. By referring to the flood risk and flood management layers of Map 88 it is evident that large parts of the area surrounding the village are protected by flood defences and are therefore at low risk of flooding.
- 4. This is also shown on the up to date flood zone and flood risk mapping available on the Government websites;

Flood map for planning Long term flood risk information https://flood-map-for-planning.service.gov.uk https://flood-warning-information.service.gov.uk/long-termflood-risk/map

5. A series of maps are attached to this statement to show the actual level of flood risk and the extent of flood defences surrounding Glasson Dock. These are;

Map 1 - LCC Level One Strategic Flood Risk Assessment: Map 88 Flood Zone layer Map 2 - LCC Level One Strategic Flood Risk Assessment: Map 88 Flood Risk Management layer Map 3 - LCC Level One Strategic Flood Risk Assessment: Map 88 Flood Risk layer

Map 4 - GOV.UK Flood map for planning - showing the line of flood defences and defended area Map 5 - GOV.UK Long term flood risk information - showing the probability of flood risk

- 6. Map 6 is a base map (with all layers removed). It shows;
  - that by comparing the base plan with Maps 2, 4 and 5, only a short section of the approach road (B5290) to the village is affected by tidal flooding where it passes through an undefended area to the west of the junction with the A588 at Condor Green. Tidal flooding occurs on this short length of road approximately 10 to 12 times per year;
  - 2) on the limited number of occasions when the short section of the B5290 is affected by tidal flooding, traffic can use the alternative route running south of the village and joining the A588 further south.
- 7. Our clients therefore maintain their objection to Policy SP2 on the basis that whilst we agree that Glasson Dock should not be a 'focus for growth outside the urban area' to the same extent and scale as other Tier 3 Sustainable Rural Settlements, the 'all or nothing approach' resulting from classifying Glasson Dock as a Tier 4 settlement will unnecessarily restrict its growth to only 10 no. affordable dwellings (based on local needs) over the 20 year plan period. The Council confirmed that an early review of the plan would not revisit the settlement hierarchy.
- 8. The flood risk evidence base does not support this overly restrictive approach and removing policy support for an appropriate scale of open market as well as affordable housing over the plan period, will not maintain the long-term sustainability of Glasson Dock and a balanced community, and it will be at risk of losing its facilities including the primary school. There has been no new housing development in Glasson Dock for 25 years and failing to address the need for an appropriate level of new market and affordable housing does not represent positive planning.

Appendix - Maps 1 to 6













