



NEWSBRIEF 36 : LANCASTER COUNCIL'S PROPOSED MODIFICATIONS TO THE LOCAL PLAN

As we reported in Newsbrief 35, Lancaster City Council is calling for responses to its proposed modifications of the Local Plan. These proposed changes are detailed on the Council website at :

<http://www.lancaster.gov.uk/planning/planning-policy/local-plan-suggested-modification-consultation> Open this link, then the link to the Local Plan Documents, and open the Strategic Policies and Land Allocations DPD, this is the key document.

The Council are asking everyone who objected to the Local Plan back in the Spring whether or not they support these modifications.. Failure to respond and state that we do not support them could be interpreted as agreement. This could be detrimental to our case with the Planning Inspector and imply we are now all happy!

You do not need to write much but writing, either by email or by letter by 2 November 2018, is **VITAL** to avoid the assumption that modifications are acceptable.

Comments to be sent to the Planning Policy team via either email:

planningpolicy@lancaster.gov.uk or post to: Regeneration and Planning, PO Box 4, Town Hall, Dalton Square, Lancaster LA1 1PJ

Key issues to ask yourself when you look at the modifications

If you kept a copy of the objections you sent to the city council back in April, you might find it useful to refer back to it.

1. Do the modifications come close to resolving your objections?
2. Alternatively is it the case that the modifications insufficiently address your concerns?
3. Why is the City Council adopting yet another housing need number - 455 houses per annum – when according to the government's methodology for calculating the housing need figure for the district only 131 new homes per annum are needed?
4. With the housing numbers given in Chapter 9 – an expectation that BGV will contribute only 460 homes by 2034 - is Bailrigg Garden Village still relevant to the housing needs of the district in the period covered by the Local Plan? And is it acceptable for the taxpayer given that a transport infrastructure spend of over £100m is needed to make it happen?
5. How convincing do you find the statements added to the original version?

Identifying the modifications.

To make it easier for you we have extracted the relevant modifications with page numbers and paragraph numbers in **blue**, we have added some suggested queries/observations in **red**. Of course you may have other comments on the modification, these are some ideas to make your job easier. When phrasing questions it is best to use your own words rather than just copying and pasting identical questions.

1. **Chapter 8.0** There are no modifications to the jobs numbers underpinning the Local Plan yet we questioned the underlying projections, especially as they related to South Lancaster

2. Policy S04 p. 20

Working to reduce levels of air pollution within the district, particularly in the designated Air Quality Management Areas (AQMAs) of Lancaster City Centre, Carnforth Town Centre and Galgate and other major transport corridors within the district.

Why was this key issue tacked on rather than being a core objective embedded throughout the Local Plan? How is it to be achieved without moving traffic congestion to a new pinch point and without encouraging new car journeys?

3.p. 38 .

9.19 Policy SP6 establishes what the Council consider to be a deliverable and realistic housing requirement for the district. Through Policy SP6 the Local Plan sets out how the Council will seek to deliver just over 9,000 new dwellings over the period 2011/12 to 2033/34, 3 years post the official plan period of 2031/32 and equivalent to an annual requirement of 455 dwellings per annum. The accompanying housing trajectory set out in The 455 dwelling per annum figure has been rolled forward to cover the 15 year NPPF

9.20 The Local Plan identifies what it considers to be a realistic housing requirement for the district, delivering the full element of demographic need identified by the revised Government methodology for calculating local housing need in the Housing Requirement Study as well as a level of uplift sufficient to secure economic opportunities across the district. And Policy SP6 p 40 (section including Bailrigg Garden Village)

Policy SP6: The Delivery of New Homes			
Between 2011/12 and 2033/34 the Council will seek to deliver a net minimum delivery of 9,100 new dwellings per annum over a 23 year plan delivery period, equivalent to 455 new dwellings.			
Beyond the Plan period the 455 dwelling per annum figure has been rolled forward to cover a longer delivery period of 23 years.			
The delivery of the housing requirement will be realised through maximising opportunities for the regeneration of brownfield land within the district, the delivery of large strategic greenfield sites adjacent to urban areas and the delivery of smaller greenfield sites across the district. The opportunities for housing delivery are highlighted in the table below:			
POLICY REF	SITE NAME	TOTAL NO OF DWELLINGS	NO OF DWELLINGS ANTICIPATED IN THE PLAN PERIOD
STRATEGIC DEVELOPMENT SITES			
SG1	BAILRIGG GARDEN VILLAGE	3,500	460,655
SG7	EAST LANCASTER STRATEGIC SITE	92500	475,000
SG9	NORTH LANCASTER STRATEGIC SITE	700	495,700

The Office of National Statistics state that 131 new dwellings per year are required to meet projected household growth. But on top of that, the city council wants to add 324 new dwellings per year in order to meet demand in the district created by (unspecified) new jobs. How realistic is that?

Again, is Bailrigg Garden Village relevant and viable with this reduced level of population-driven demand for new homes?

4. p.50 and p.52

12.7 More detail on the Spatial Development Framework is provided in paragraphs 12.19 to 12.23 of this DPD, however the preparation of Framework will be guided by the development principles which are outlined in Policy SG1 of this DPD. -

In the light of this statement why has 12.19 (Outlining road infrastructure) been deleted?

5. Policy SG 2 Health Innovation Campus p. 55

VIII. The preparation of a Flood Risk Assessment that details how, through the design, construction and occupation phases of development, proposals will deal with the matter of flood risk, particularly in relation to the Ou Beck watercourse and **the surface water issues across the site.**

Why is there still no reference here to Burrowbeck which flooded in November 2017, upstream from the Health Innovation Campus and into which drainage from the site is directed?

6. P.59 Policy SG3 Infrastructure Delivery

As with Policy SG1, it is anticipated that this policy will be superseded upon the completion of the Lancaster South Area Action Plan DPD which will deal with the matters of infrastructure, funding, delivery and phasing in full.

Why the moving goal post with a key element of the Local Plan which was incomplete in April 2018, being removed for 'further discussion'. Does this not impact on the integrity of the Local Plan as a whole?

7. Policy DM3: The Delivery of Affordable Housing

In the modifications to the Development Management DPD, there are significant changes proposed which reduce the volume of affordable housing to be delivered by developers (as a starting point) on greenfield and brownfield sites. On greenfield sites the maximum percentage of affordable homes will be 30% of homes on a development, down from 40%. And on brownfield sites, the maximum percentage of affordable homes to be provided by a developer will be 20%, down from 30%.

Most people will recognise that the prime requirement is for affordable homes, not market-priced homes.

On the Canal Quarter, the city council appears to rule out affordable housing altogether. See para. 13.15 of the Strategic Policies document:

'Residential development will be also supported in the Canal Quarter for student accommodation (as described in paragraph 13.21) and wider market housing.'

We would question the meaning and added value of the following statements:

7. Lancaster South Policy SG1 p. 53

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

How? Where? What kinds of business? This is aspiration rather than based on evidence.

8. Policy SG 3 p. 59

The reservation and management of land to ensure **the effective management of water**

This seems to be the only amendment regarding flooding issues. What is the meaning of the phrase. How? Where? When? How funded?

Sending Comments on Modifications:

You don't need to write very much and do make use of our page numbers and para refs where possible. You don't need to repeat your original objection, just state that you do not support the proposed modification. It is essential to register our objections to the Planning Inspector and ensure our doubts are recorded.

Comments to be sent to the Planning Policy team via either email:

planningpolicy@lancaster.gov.uk or post to: Regeneration and Planning, PO Box 4, Town Hall, Dalton Square, Lancaster LA1 1PJ. **The deadline for responses is 2nd November!**