



Scotforth Rural Draft Neighbourhood Plan (First Draft Plan v8 September 2024)

Lancaster City Council Response

28th October 2024

The council welcome the opportunity to provide comments and input into the preparation of the Scotforth Rural Neighbourhood Development Plan (the Plan). The comments provided in this response are informal officer opinions and without prejudice. They are intended to support the Parish Council in producing a robust plan, which will meet the basic conditions for neighbourhood planning in accordance with national and local policies. A formal council response will be provided at the Regulation 16 stage prior to submission of the Plan for examination.

On the whole the Plan provides a positive approach. The changes from previous drafts have been noted and the way in which they address the comments made at an earlier stage is welcomed. There are few remaining matters which require attention.

Chapter 2: Introduction and Background

Planning documents benefit from being as succinct as possible. Much of the introduction relating to the preparation and consultation would be more appropriate to include within the Consultation Statement required with the submission of the plan.

Chapter 4: Draft Vision and Objectives

Visions usually provide a vision about the character of the Parish and how this may evolve. In this instance the Vision relates to the Plan and its policies and potentially misses an opportunity to set this out. The proposed vision to ensure the rural and heritage character and influence development is potentially a positive one but it is unclear what is meant by this. The first sentence also appears to concentrate on the settlements, rather than providing a vision of the whole of the Plan area. The second sentence would be more positive as a vision if it said what new development achieve. It would be worthwhile re-phrasing the vision express a future for the Parish.

Chapter 5: Planning Policies

Given the location in proximity to the Forest of Bowland National Landscape and functionally linked land, a policy on environmental designations / protection / enhancement will be needed. This omission is likely to be highlighted within the screening opinion and the responses from the statutory bodies. Both Aldcliffe with Stodday and Carnforth's plans include policies which have been supported by the council, Natural England and Examiners. A similar policy is recommended.

Draft Policy SR1: Bailrigg Village Area of Separation and Development Boundary

Area of Separation

The aims of the policy are supported and are considered to be in conformity with the Local Plan. However, concerns about the extent of the proposed Area of Separation, the lack of a clearly defined boundary and the evidence to support the Area of Separation remain. While the LCA assesses the character more evidence is needed to justify a designation and the designation as proposed. Further assessment of the landscape, using the principles of a Landscape and Visual Impact Assessment would be of benefit including what quality is the landscape (this may change across the area), further analysis of the landscape value and sensitivity, the visual importance and sensitivity are the susceptibility to change.

The Burrow Beck Solar Farm has now been granted planning permission. The wording of the policy should be amended to reflect the permission granted for the solar farm. Further wording or amendment may also be necessary, depending on the outcome of the Gladman appeal, the Inspectors assessment of the landscape and the reasoning behind the decision.

Development Boundary

The proposed Development Boundary (the last paragraph of the policy) addresses a different matter to the Area of Separation. The Area of Separation seeks to curtail development whereas the Development Boundary section seeks to allow development within a specified area subject to criteria. It is recommended that the Development Boundary section is placed into its own defined policy.

It is also recommended that an explanation is included to explain what is meant by proven local needs and how this should be evidenced by applicants. Is it intended to meet Parish needs, nearby settlements such as Galgate or south Lancaster? Will a local housing needs assessment be required or should it use parish level or other needs data needs identified in a future Strategic Housing Market Assessment?

As the area within the proposed Development Boundary includes Listed Buildings and Non-Designated Heritage Assets, it is recommended that the policy includes a section in relation to the heritage assets, their significance and character and new development.

Background Text

While the Garden Village proposals and the Area Action Plan are not proceeding, it does not mean that the Local Plan policies no longer apply. It is recommended that the following sentences are removed from paragraph 11:

‘It would not be appropriate to identify Areas of Separation around these settlements because the Garden Village proposal has been withdrawn and Local Plan policies relating to that proposal no longer apply. The area is located within the Lancaster South Broad Location of Growth.’

It is also recommended that ‘major’ is omitted from the last sentence of paragraph 11 as the character will be consideration for all development.

Draft Policy SR3: Hedgerows, Trees and Woodland

Even poor-quality hedgerows and trees can have a positive visual and biodiversity impact. Quality can sometimes be improved with maintenance and/or additional planting. It would be more appropriate to encourage retention and enhancement of all trees/hedgerows whilst acknowledging that there may need to be additional planting, replanting and replacements.

Bullet point 4 could be read that 4 trees will suffice for a large development. It is recommended that the bullet point is expanded upon to refer to a scale or development where 3 trees would be expected and this minimum should increase proportionate to the size of the development.

Tree and woodland planting have a significantly increased benefit where they expand existing woodland, corridors and chains. The Green and Blue Infrastructure Strategy identifies opportunities for this. It is recommended that this is expanded upon in the last paragraph of the policy. It would also be worthwhile highlighting the Green and Blue Infrastructure Strategy as a source of information about trees/hedgerows and opportunities for enhancement.

Draft Policy SR4: Responding to Local Character

It is recommended that the policy explicitly says that the Neighbourhood Plan adopts the Scotforth Rural Neighbourhood Plan Design Guide and Codes.

The policy refers to the codes set out in Part 3.2 but they are within 3.3.

Draft Policy SR5: Small Scale Development in Burrow Heights and Lower Burrow Local Character Area

It is recommended that the policy references local need in a similar way to the Development Boundary policy for Bailrigg Village together with the suggested additions to that policy.

As the area includes a Listed Building, it is recommended that the policy includes a section in relation to the heritage assets, their significance and character and new development.

For ease of use, this policy would be better placed next to the policy relating to the Development Boundary for Bailrigg Village.

Draft Policy SR6: Sustainable Design

The sustainability standards relating to climate change and environmental sustainability may change as part of the current Local Plan review and the National Model Design Code doesn't set out standards. It is recommended that footnote ² is omitted from the policy.

Comments on the proposed Design Code are included at the end of this response. There are some questions over the effectiveness of the design code in relation to some of the areas relating to sustainable design, in particular the way in which parts are drafted.

Policy SR7: Reducing Flood Risk and Improving Drainage

It is recommended that paragraph 2 is amended to remove the words, 'informed by local consultation' and the following are added, 'to reduce flood risk'. Local opinions may be subjective and consultation can vary in terms of quality. As this is a technical matter, it should be informed by evidence at application stage.

Drought resistant plants are not always appropriate such as in areas that flood, during times of heavy rain and when land is waterlogged. Planting should be tailored to the local circumstances and water

loving plants can help mitigate flood risk. It is recommended that the last paragraph is amended to reflect this.

Draft Policy SR8: Walking, Cycling and Horse Riding

Schemes where there would be an unacceptable impact on highway safety will not usually be permitted. The aim behind the section of the policy is supported but it is recommended that it is reworded.

New foot and cycle paths are expected to be safe, direct and accessible and standards to achieve this are set out in the LTN120. It is recommended an expectation that these standards are met is included within the last paragraph.

Neither Map 5 or 6 show the existing cycle routes which are a key part of the sustainable travel system. The accuracy of the plans is also questionable. The cycle paths should be added and either the accuracy of the markings on the maps improved or they should be labelled as indicative.

The LCWIP and the Climate Emergency Local Plan refer to and identify strategic cycling and walking improvements including along the A6. There is also aspiration to improve cycle accessibility between the University north through Hala. It is recommended that these are added to the maps.

Appendix 4: Scotforth Rural Neighbourhood Plan Design Code

It is assumed that the Appendix is intended to highlight the codes within the main Design Code document. However, the Appendix does not explain this is the intention. It is recommended that some context is provided at the beginning of the Appendix to explain that the Neighbourhood Plan adopts the Design Code for use in decision making, that the Appendix provides the codes and that applicants/developers should refer to the Design Code for the background, area analysis and detail and that the appendix specifies the codes to be used.

Monitoring Methodology

A monitoring methodology is essential to ensure that the plan can be monitored and reviewed when necessary. This will be required for the Plan to be consistent with the basic conditions.

Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA)

SEA and HRA screenings are required to be carried out for the Plan in consultation with Natural England, the Environment Agency and Historic England. As the Plan currently lacks an overarching environment/biodiversity policy, reference to heritage in policies supporting development and monitoring methodology, this will be highlighted in the screenings raising concerns that further work may be required. It is also likely that without these being addressed, the statutory bodies will raise concerns or objections.

The screenings have not yet been drafted given the issues expected to arise from these omissions. It is recommended that this is rectified and a revised Plan which addresses these issues is provided to the council to carryout screenings before the Plan proceeds to Regulation 14.

General Comments

The background text should relate to the proposed policies. There is no need explain previous iterations of the policies, consultations or include significant portions of the evidence. Sections of the background text would be better located within Consultation Statement and simply referring to the relevant paragraphs of evidence or other documents will usually suffice.

Scotforth Rural Neighbourhood Plan Design Code

The additions which seek to better address climate change are appreciated but they do raise some questions.

Context response

While, figure F.28 better reflects the existing layout, it should be caveated that this relates to the built form rather than the number of dwellings. The same applies to figure F.39.

Resilience to Climate Change

It is unlikely that development would support future planting for sustainable materials given the scale it would be needed to address biodiversity net gain, habitats enhancement and amenity. Planting trees for fuel would not be supported as this would lead to their loss adversely affecting biodiversity and amenity and negating the carbon capture. It is recommended that reference to fuel and building materials is removed and this is replaced with reference to biodiversity and amenity.

Policies in the Plan expect tree planting for all scales, bullet point 2 refers only to major development. It is recommended that this is revised to be consistent with the Plan.

Are the properties at Figure 44 built to enhanced energy efficiency standards beyond Building Regulations or the proposed requirements of the CELPR? They would need to meet enhanced criteria for a photograph to be appropriate in this section.

Assessing Alternative Energy Sources and Electric Vehicle charging

The wording simply highlights considerations/issues/challenges rather than providing a code. To form part of a code, the wording should set out how such issues/challenges must/should be dealt with. It is recommended that the sections are rephased.

Energy efficiency measures towards Net-Zero carbon

The emerging Future Homes Standard is not considered to be principally a fabric first approach as it is expected to include limited improvement to insulation requirements and energy conservation. The Climate Emergency Local Plan proposals go further and faster than the Future Homes Standard to require a fabric first approach and meet net zero earlier. It is recommended that, 'in line with the governments Future Homes Standard' is omitted so it is not contradictory to the CELPR policies.