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*working locally and nationally for a
beautiful and working countryside*

Deadline: 24 March 2017

Planning and Housing Policy Team,
Regeneration and Planning Services,
Lancaster City Council,
Lancaster Town Hall,
PO Box 4,
Dalton Square,
Lancaster, LA1 1QR.

Dear Planning and Housing Policy Team,

1. The Lancashire Branch of the Campaign to Protect Rural England (CPRE Lancashire) is delighted to respond to the Lancaster City Council Local Plan 2011-2031 consultation March 2017.
2. CPRE and its members view the English countryside as iconic. It is unique, essential and precious, and it is in danger. Every year, a little more is lost forever to urban sprawl, new roads, housing and other developments. Rural shops and services are under pressure and intensive farming is changing the character of the countryside. Based on evidence, we believe climate change will have serious impacts on the rural environment and local plan policies must address this important environmental issue.
3. Lancaster District is predominately rural with over 90% of its 565 km² classified as land in countryside. The District is blessed with a wealth of beautiful and distinct rural landscapes associated with the northern edge of the Amounderness Plain, the Bowland Fells, which includes the Forest of Bowland AONB the Bowland fringes, the Lune Estuary and Valley, Wyresdale and Roeburndale, , and not least Morecambe Bay limestone area which includes the Arnside and Silverdale AONB.
4. All of the abovementioned wonderful landscapes need a sound local plan adopted to keep development focused in urban areas and free from built intrusions. The quality of the natural environment is a key reason many people chose to invest, work, live, and visit here.
5. Our Branch office has received a high level of enquiries from members of the public expressing concern over the unnecessary greenfield allocations, with considerable scepticism over the magical calculations that have led to such excessive proposed jobs and housing development.

6. We acknowledge that the Local Plan sets out a vision to conserve and enhance the District for generations to come. It is with this in mind that we submit the following comments to help the Council refine its land use policies and site allocations to achieve this shared ambition.
7. Essentially CPRE supports the right development, in the right places for the right reasons. This is otherwise known as ‘Smart Growth’, identifying where needed development should go based on sound town and country planning principles, such as urban concentration, reuse of previously developed (brownfield) land, reliance on sustainable travel patterns, improvement of existing infrastructure, and provision of high quality green spaces to achieve development that is truly sustainable.
8. CPRE is keen to see that Lancaster City Council has properly exercised its ‘duty to cooperate’ to ensure ‘strategic issues’ are adequately addressed. In doing so they will ensure greenfield development, particularly Green Belt loss, is avoided, minimised or where properly justified is adequately planned.
9. We set out comments to The Part One: draft Strategic Policies and Land Allocations Development Plan Document (DPD) in Annex One.
10. We wish the planning team every success in progressing the Local Plan to adoption to bring about needed sustainable development in Lancaster District for the next 25 years. If you would like further information please contact me without delay.

Yours sincerely,

Jackie Copley MRTPI MA BA(Hons) PgCert

Planning Manager

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Annex One The Part One: draft Strategic Policies and Land Allocations Development Plan Document (DPD)

1. Introduction

CPRE Lancashire is supportive of Lancaster District planning for a prosperous future. However, we believe the jobs and housing evidence bases are potentially flawed, as the projections for future growth are overly ambitious. Global uncertainties continue and this economic reality ought to be addressed. The Planning and Housing Team must be careful not to over-plan development due to problems this can cause, not least for the loss of beloved countryside land for development.

We recommend rigorous monitoring of the Local Plan with appropriate phasing of greenfield land allocations to ensure brownfield development and urban regeneration has a fair chance of success.

2. A Spatial Portrait of Lancaster District

Lancaster District has an ageing population of 141,300 people that live in relative low density, in a predominately rural area (over 90% of its 565 km² classified as land in countryside) with two Areas of Outstanding Natural Beauty (AONB) - the Forest of Bowland AONB and the Arnsdale and Silverdale AONB. The largest wetland area in the UK is situated at Morecambe Bay, which is internationally protected due to its wetland habitat and birdlife. In total environmental designations cover 74% of Lancaster District (a total of 42,064 hectares). This makes local plan policy making and land allocations so important.

3. A Spatial Vision for Lancaster District

CPRE Lancashire is supportive of the Spatial Vision

4. Strategic Objectives for the Local Development Plan

SO1: Delivery of a thriving local economy which fosters investment and growth and supports the opportunities to deliver the economic potential of the district.

While broadly supportive of SO1 CPRE Lancashire's considers retaining existing jobs and to promote additional job creation to support a total of 54,000 FTE jobs by 2031 is overly ambitious. Please see comments below on Policy SP5: The Delivery of New Jobs.

We are delighted to see reference to making the most of the district's geographical position and varied rural landscapes, but recommend that there should be an explicit reference to the visitor economy. We are also pleased to note the ambition to support rural diversification, rural job creation and rural economic growth through encouraging and securing appropriate growth of existing and new rural businesses. We would not wish unsuitable employment uses to be justified in sensitive landscape locations.

SO2: Provision of a sufficient supply, quality and mix of housing to meet the changing needs of the population and support growth and investment.

If the National Planning Policy Framework is taken as a whole it could be that in an area of restricted land such as Lancaster District that the full Objectively Assessed Housing Need

cannot be delivered in full. If Green Belt land is providing one or more of the five Green Belt purposes than it should remain. Please see further comments under Policy SP7: The Delivery of New Homes.

In the third bullet, we agree that all new development should be well designed, sustainable and energy efficient. The words 'where possible' before energy efficient should be deleted, as this will result in the strategic objective not being met.

The last bullet under SO2 is vital. Rural housing must be of appropriate 'size and tenure' to meet local needs. It is simply not acceptable for developers to deliver only market executive or family sized housing. Affordable homes must be provided locally to support people with restricted incomes.

SO3: Protect and enhance the natural, historic and built environment of the district.

We support this strategic objective. The Local Plan must minimise the risk of flooding and, establish clearly defined Green Belt boundaries, including the identification of safeguarded land, which will be robust and endure for the long term.

We have witnessed local plans adopted to be mercilessly unpicked by the legal teams of housing developers and therefore there does have to be a balanced portfolio.

CPRE supports both:

SO4: The provision of necessary infrastructure required to support both new and existing development and the creation of sustainable communities. This

SO5: Delivery of a safe and sustainable transport network that improves both connection within and out of the district, reducing the need to travel and encouraging more sustainable forms of transport.

5. Key Diagram for Lancaster District

CPRE recommends there should be no release of land designated as North Lancashire Green Belt for development.

6. Presumption in Favour of Sustainable Development

Policy SP1: Presumption in Favour of Sustainable Development

CPRE agrees new development must be sustainable, but we have concern about a policy presumption in favour of 'sustainable development' when 'sustainable development' is not defined either in the NPPF or the local plan. We ask that a definition is provided under SP1. We recommend the Brundtland Commission definition:

"Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs". It contains two key concepts:

- the concept of "needs", in particular the essential needs of the world's poor, to which overriding priority should be given; and
- the idea of limitations imposed by the state of technology and social organization on the environment's ability to meet present and future needs."

7. The Role and Function of our Towns and Villages

CPRE Lancashire agrees with the Policy SP2: Lancaster District Settlement Hierarchy. The main urban settlements of Lancaster, Morecambe and Carnforth should be the focus for job and housing development.

The eighteen sustainable settlements identified will need effective local plan policy. In addition careful consultation with local communities to ensure Neighbourhood Plans are progressed to adoption, setting out how the local character and distinctiveness of each community is to be protected and enhanced. The planning and housing team have a clear facilitation role in this respect.

In the smaller rural villages the local plan policy should restrict speculative development. Only very small housing developments that meet specific local need should be given planning permission.

Policy SP3: Development Strategy for Lancaster District

CPRE Lancashire supports Lancaster City Council approach to the development strategy because it is urban-focused. The approach to brownfield land set out in paragraph 7.9 and role of the Brownfield Register to be published in 2017 is welcomed. We hope the Council will use all the powers and tools at its disposal to unlock the potential of vacant and underused brownfield land.

There ought to be transparency on site viability assessment. The Housing White Paper is vocal on this point. The planning system must be fair and not unduly promote greenfield before brownfield sites, and open book appraisals would help to justify decisions and help focus public sector investment into unlocking constrained, wasted space, rather than unbuilt land in the countryside. The latter tends to be much less sustainable with poor accessibility, and deficient infrastructure, particularly public transport. It would be perverse if the Local Plan identified investment of public funding into bulldozing greenfields when brownfield land blights existing communities and could be positively reused.

We accept that prevailing market conditions should influence planning decisions. However, prevailing market conditions should not only inform site allocations, but must also inform the level of jobs and housing development identified in the local plan. If realism is applied to both the jobs and housing figures (see below) than the additional large strategic development sites in greenfield locations will not, in fact, be required.

CPRE Lancashire believes it is of fundamental importance that greenfield site release is carefully managed by the Lancaster District Local Plan policies to ensure the market for brownfield land is maintained and not disadvantaged by an over-supply of greenfield land being allowed for development. As the Local Plan stands the regeneration ambitions of the Council will be thwarted.

We strongly recommend the introduction of a local brownfield target. Previously the target set by the North West Regional Spatial Strategy for dwellings on brownfield land was 70%. Lancaster District had previously worked well to bring forward brownfield land to beneficial use. The Local Plan should have a higher and more reasonable aspiration for brownfield development in the future.

CPRE Lancashire agrees that it is right that 'development in other rural villages will only be supported where it is clearly demonstrated that it is meeting proven local needs'.

We are pleased to note the Council in allocating land for development has considered AONBs, Green Belt and other designations when establishing the scale, extent and form of development. However, we have some concerns over specific sites, such as the straying of the proposed Bailrigg site to the east of the M6; the harm to the North Lancashire Green Belt boundary; and in the setting of the Forest of Bowland AONB (see comments below).

The City Council should review some of the allocations in their entirety, and ought to amend boundaries unless it is shown that they are unjustified. Green Belt and countryside land must be kept free of development if there are reasons relating to environmental and planning policy restrictions.

8. Regeneration and Economic Growth

CPRE is supportive of Lancaster City Council planning for a healthy economy. However, we are concerned that the scale of growth identified for the Arc of Prosperity is too high.

Government Planning Practice Guidance for housing and economic development needs assessments:

Need for all land uses should address both the total number of homes or quantity of economic development floorspace needed based on quantitative assessments, but also on an understanding of the qualitative requirements of each market segment.

Assessing development needs should be proportionate and does not require local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur.

Paragraph: 003 Reference ID: 2a-003-20140306

Revision date: 06 03 2014

We have concerns about the assumptions used leading to the calculations. Such as technological advancement, such as the automation of manufacturing and warehousing processes, and changed work/life patterns resulting in an increase in people working from home need are not adequately reflected. So we do not agree that the conclusion that a net increase of 9,600 FTE jobs is required to support 54,000 FTE jobs by 2031, equal to a 20 per cent growth is robust. We do not believe that this level of employment creation can be reasonably expected to occur.

Whether it is mathematically possible for the whole of the UK, North West and neighbouring areas of Lancashire District to simultaneously plan for jobs growth must be considered. Preston City Deal seeks to provide a significant number of new home. The areas of Fylde, Ribble Valley, South Lakeland and Wyre all seek to substantially expand their economic activity and housing provision. We believe there is a real absence of strategic planning and danger of duplication in employment premises provision.

The Northern Powerhouse focuses growth in the hubs of Manchester, Liverpool and Leeds, and will suck economic activity from elsewhere. The Midlands Engine is also planning for growth and the South East shows little sign of slowing. So what and/or where is the source of all the people is to fill the level of jobs growth being planned?

The Turley Review of the Employment Land Position , January 2015 shows the commuting patterns in and out of the District. Previously planning proceeded on the basis the economy of the District was quite self-contained, but the travel patterns may indicate a change and there may now be a greater need for cross-boundary working and more evidence of the duty to cooperate now necessary. Devolution provides strategic planning and investment opportunities for the District and beyond.

Swamping the property market with an abundance of greenfield sites, and taking a chunk out of protected Green Belt, will simply erode the viability of existing vacant brownfield sites in existing urban areas.

If traditional sectors are in decline it is important to reuse previously developed sites to bring forward new economic development opportunities. Possible alternatives must be properly considered with the possibility of land assembly exercises in partnership with the private sector to enable former factory sites coming forward at a scale appropriate for needed new uses.

Looking at the Summer 2015 Lancaster City Council update on Employment Land it shows 290 hectares of employment land exists, and 25% or 77.5 hectares was vacant. Bringing existing sites into higher occupation must be a priority.

It is understood that manufacturing is a key employment sector and distribution uses focus around the M6 Motorway. We agree the economy should diversify. Knowledge, energy and environment, Port and the visitor sector are all important emerging sectors, but CPRE believes more attention ought to be given to the importance in rural jobs such as farming and forestry and linked sectors such as food and drink.

If the population of Lancaster District is set to grow then more local produce will need to be grown to feed the people. We ought to be ensuring the protection of high grade farming land. Best and Most Versatile land (grades 1-3a) should not be included as local plan allocations. Once countryside/productive agricultural land has been built over, it has gone forever.

CPRE is not convinced that exceptional circumstances have been fully justified for Green Belt land release. CPRE Lancashire accepts the new sectors of growth, but believe more can and should be done to reuse brownfield land and consequently this should be reflected in Policy SP4: Priorities for Economic Growth and Policy SP5: The Delivery of New Jobs.

CPRE Lancashire is broadly supportive of Policy SP6: Lancaster District Regeneration Strategy, but is concerned over plans for employment sites in the countryside. CPRE supports a thriving rural economy, however the impacts of development are localised and each site would need careful consideration and consultation with the local community involved. We suggest the Council supports communities to positively prepare neighbourhood plans to guide how such rural employment sites could best come forward, if at all.

9. Housing Delivery and Distribution

CPRE Lancashire agrees that everyone has the right to a safe, decent and affordable home which meets their needs, in a community where they need to live.

The DCLG household formation rate that must be applied is too high, but we accept this is outside the remit of the planning and housing policy team and a matter for CPRE Lancashire to make the case with Government in our response to the current Housing White Paper: *Fixing Our Broken Housing Market*. Time will undoubtedly show this Government household formation rate is artificially inflating housing numbers.

Policy SP7: The Delivery of New Homes

CPRE is supportive of delivering enough needed houses of the right type and tenure. However we have considered the Turley/Edge Analytics assessment and believe it may be flawed as it concludes a range of housing need of between 13,000 and 14,000 net new dwellings between 2011 and 2031. Based on this assessment the Council chose to plan for 13,500 homes, equal to 675 dwellings per annum (dpa).

CPRE believes this is too high reflecting aspiration of developers and land owning interests so is an asserted demand based on profit, rather than a genuine need. It is a very high figure when compared to the 400dpa target identified in the North West Regional Spatial Strategy, which the Government abolished based on the housing targets being too high.

The historic performance of housing completions, especially in the most recent five years demonstrated just how unachievable the target would be. The housing industry is technically in recession at present, and is constrained with regard to risk, accessing finance, skills and raw materials to deliver such a high number of completions. House building will not buck market trends.

The Local Plan is in grave danger of not being found sound. The housing demand of 13,500 dwellings is matched with a supply of 11,960 dwellings. An examiner will need to see that the Local Plan supply is adequate. If the Council plans for a more realistic 'housing need' figure the housing supply would be adequate and the Local Plan will stand a much better chance of being found sound.

The Government Planning Practice says when assessing housing need authorities should be proportionate and only future scenarios that could be reasonably expected to occur should be progressed in Local Plans. (Paragraph: 003 Reference ID: 2a-003-20140306, Revision date: 06 03 2014.)

From recent experience of demographic appraisal work for local plan evidence bases of Sefton and Greater Manchester (across ten authorities) we observed problems with the assumptions used for vacancy rates, unattributed population change, migration and high jobs growth leading to bloated housing numbers.

We note the Council has phased housing delivery acknowledging it can only deliver 500dpa in the first five years, then 675dpa in the mid and some 850 dpa later in the plan period. We would encourage a lower number as we believe Lancaster District will set itself up to fail.

Setting Up to Fail

The Council will suffer terribly if it sets itself up to fail. The Council can only allocate land in the Local Plan and process applications, it cannot (yet) actively build itself. Failure against stated the target will enable developers to find the five year housing land supply is 'absent' and the local plan 'out of date' to enable the development of land never intended for development. In such cases, the Council will lose the ability to control where development goes, as has happened across the country with the application of the NPPF's five year housing land supply rule (a trump card for developers).

CPRE's report identifies a vicious circle relating to unrealistic housing targets being set.

- Councils are forced to allocate greenfield land to meet the targets.
- Developers cherry-pick the most profitable greenfield sites.
- Building takes place slowly, to keep prices high.
- So the housing targets are missed...
- ... and councils are forced to allocate more land for building.
- Developers again target the most profitable sites.

And so it goes on, causing huge strife without getting more homes built. See the full report here: <http://www.cpre.org.uk/magazine/features/item/4167-set-up-to-fail>

Therefore CPRE Lancashire recommends that the housing target is reduced to be more realistic to have a chance of being achieved. CPRE Lancashire agrees that adequate affordable housing and types suitable for aging population must be delivered. Naturally, we are pleased to see the policy for housing is to be kept under review.

It is staggering that almost half the housing identified is proposed to come forward on greenfield allocations. We are opposed to the release of Green Belt land as we do not believe exceptional circumstances have been demonstrated. We are opposed to a number of sites being include in this policy. (See our comments below):

- South Lancaster Policy SG1: Bailrigg Garden Village - East of M6;
- Policy SG8: Land at Cuckoo Farm / Ridge Farm, East Lancaster;
- Policy SG10: Land at Hammerton Hall, North Lancaster;
- Policy SG11: Land at Beaumont Hall, North Lancaster; and
- Policy SG14: Land South of Windermere Road, South Carnforth.

All major sites must be properly masterplanned.

We are pleased to note the inclusion of windfall sites, although believe the contribution in terms of dwelling figures could be higher.

10. The Natural and Historic Environment

CPRE Lancashire is supportive of the policies under this section of the local plan. The word rural (as 90% of the area is rural it should be referred to) is missing from Policy SP8: Maintaining Lancaster District's Unique Character, and Policy SP9: Protecting the Natural Environment.

11. Delivering Infrastructure

CPRE Lancashire is broadly supportive of Policy SP10: Maintaining Strong and Vibrant Communities and Policy SP11: Improving Transport Connectivity. Perhaps air quality should be referenced under sustainable modes of transport.

12. South Lancaster Policy SG1: Bailrigg Garden Village

The site is located between a Gateway location and a local centre and has a Strategic Cycle Network running through it. Parts of the area identified are minerals safeguarding areas.

The development of Bailrigg for 3,500 houses and other development will cause Lancaster to merge with the Lancaster University campus. Essentially it is ribbon development and although not a Green Belt site, it does contain open countryside with important area of separation and therefore CPRE Lancashire would recommend brownfield land elsewhere is used in advance for needed development.

CPRE Lancashire believes the breach of the M6 and inclusion of site DOS6 is totally unacceptable due to the harm outweighing the benefits, especially on the Forest of Bowland AONB, the shaded pink area to the East on the map for Bailrigg. The area to the east of the M6 Motorway must be deleted.

CPRE Lancashire recommends the Council protects and enhance the woodland known as Park Coppice, Lancaster Canal and Burrow Beck due to ecological opportunities afforded here as recognised by Biological Heritage Site status.

14. East Lancaster

CPRE Lancashire has concerns about countryside loss for 1,000 dwellings as identified as part of Policy SG8: Land at Cuckoo Farm / Ridge Farm, East Lancaster. CPRE believes brownfield land should be built in advance of this site being allocated. If allocated this site should be phased for later in the plan period. If there is absolutely no alternative then adequate natural open space and woodland should be retained in the master plan for the area. We do note that the policy says there should be no net loss in the value of the Biological Heritage Sites (BHS) at Long Bank Wood, Lancashire Canal and Newton Beck Valley, with evidence of how these BHS will be protected and enhanced with new planting and habitat creation.

The Local Plan must state explicitly that in the future there should not be a breach of the M6 corridor.

15. North Lancaster

The National Planning Policy Framework (in Section 9) states Green Belt boundaries can only be redrawn in exceptional circumstances. CPRE Lancashire does not believe that exceptional

circumstances have been adequately demonstrated for release of Green Belt land covered by Policy SG10: Land at Hammerton Hall, North Lancaster and Policy SG11: Land at Beaumont Hall, North Lancaster.

There is a strong general public understanding of Green Belt, which is: ‘the fundamental aim of Green Belts is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence’.

CPRE Lancashire urges Lancaster City Council to delete these sites from the Local Plan. There is a Neighbourhood Plan also being progressed in Slyne with Hest and the Green Belt release for housing is locally opposed.

16. South Carnforth

CPRE Lancashire is opposed to the allocation of land included in Policy SG14: Land South of Windermere Road, South Carnforth. This would harm the North Lancashire Green Belt and purpose to keep the land permanently open. Again, exceptional circumstances do not exist.

17. South Heysham

The Council should do everything in its gift to support the Port and protect and enhance the countryside at Heysham. Careful planning is essential here to minimise adverse impacts on the rural and coastal landscapes. CPRE Lancashire notes that the Heysham Industrial Estate (19.7 hectares) accommodates a range of B2 general industrial uses, and has significant portions of this site are vacant. The Council must focus on the regeneration of existing employment property to deliver fit-for-purpose employment units and improve the overall environmental quality of the area

20. Housing

CPRE broadly accepts Policy H1: Residential Development in Urban Areas with the exception of sites opposed as set out above:

- South Lancaster Policy SG1: Bailrigg Garden Village - East of M6;
- Policy SG8: Land at Cuckoo Farm / Ridge Farm, East Lancaster;
- Policy SG10: Land at Hammerton Hall, North Lancaster;
- Policy SG11: Land at Beaumont Hall, North Lancaster; and,
- Policy SG14: Land South of Windermere Road, South Carnforth.

Policy H2: Housing Delivery in Rural Areas of the District

CPRE Lancashire accepts some small-scale development is appropriate where a local need has been fully demonstrated. We believe small-scale should relate to developments of less than 25 dwellings. The rural sites within Policy H2 are to be supplemented by a range of other smaller sites from the Council’s Strategic Housing Land Availability Assessment. CPRE Lancashire believes Policy H2 must link fully with Policy EN4: Areas of Outstanding Natural Beauty, Policy EN5: The Open Countryside and Policy EN6: The North Lancashire Green Belt.

CPRE Lancashire believes communities should reserve the right to object to specific sites based on whether harm outweighs the benefit and on compliance with national, local and yet to be drafted ‘neighbourhood plan’ planning policy. We note the Council will continue to

provide assistance and advice to neighbourhood plan groups in order for them to achieve this. The rural site allocations should not undermine localism.

22. The Historic and Natural Environment

CPRE Lancashire is supportive of heritage assets being adequately protected by Lancaster City Council as new development comes forward as set out in Policy EN1: Conservation Areas, Policy EN2: Designated Heritage Assets, and Policy EN3: Central Lancaster Heritage Action Zone.

CPRE Lancashire is supportive of Policy EN4: Areas of Outstanding Natural Beauty and Policy EN5: The Open Countryside.

Lancaster District has a wealth of beautiful and distinct rural landscapes associated with the northern edge of the Amounderness Plain, Morecambe Bay, the Bowland fringes, including the Lune Valley, Wyresdale and Roeburndale, the Bowland Fells, which includes the Forest of Bowland AONB, the Lune Estuary, and the Morecambe Bay limestone area which includes the Arnsdale and Silverdale AONB. All need a sound local plan to keep development focused in urban areas and free from built intrusions.

CPRE Lancashire is opposed to any release of Green Belt under Policy EN6: The North Lancashire Green Belt. Exceptional circumstances are not demonstrated and therefore Green Belt loss is not justified. Much is made of the age of the Green Belt, but we see this as an indicator of how well it has performed, certainly no reason to release it. CPRE Lancashire believes the Council is wrong to assert housing is the main pressure, we point out if the housing requirement was not inflated the need would not exist. Furthermore available brownfield land exists in proximity. The Local Plan considers releasing brownfield employment sites in the centre of Lancaster and the long term prospect of this land being regenerated will be reduced if too much greenfield land is allocated.

Allocation of Green Belt will undermine regeneration ambitions. Development density at central urban sites can be increased to optimise housing delivery at more sustainable locations in Lancaster District.

CPRE Lancashire recognises the important function of Policy EN8: Areas of Separation. We support the continued protection and enhancement of such areas.

CPRE Lancashire supports Local Plan Policy EN9: Environmentally Important Areas. Sites of European, National and Regional level significance and Sites of Special Scientific Interest (SSSI) should be protected from development proposals which have a detrimental impact on their designation.

CPRE Lancashire is supportive of the protection of landscape areas to remain permanently open and free from future development as set out in Policy EN10: Grab Lane Preserved Setting Area.

CPRE Lancashire is supportive of Policy EN11: Mineral Safeguarding Areas.

CPRE Lancashire is supportive of Policy EN12: Air Quality Management Areas. We all need clean air to breathe. Green Infrastructure plays a vital 'green lung' function. All new

development should be considered in terms of air pollution, and all development should reduce travel, energy and waste demands.

23. Sustainable Communities

CPRE is an advocate of Neighbourhood Planning and is supportive of Policy SC1: Neighbourhood Planning Areas.

CPRE is broadly supportive of Policy SC2: Local Green Spaces, Policy SC3: Open Space, Recreation and Leisure, Policy SC4: Green Space Networks and Policy SC5: Recreation Opportunity Areas.

24. Transport, Accessibility and Connectivity

CPRE Lancashire believes the local plan should reduce journeys and promote more sustainable modes of travel. In light of this we are broadly supportive of Policy T1: Lancaster Park and Ride (subject to appropriate planning conditions to control environmental impacts), Policy T2: Cycling and Walking Network, and Policy T3: Public Transport Corridors. Any development that is too road based ought to be refused under the local plan.

25. Implementation and Monitoring

CPRE Lancashire agrees that the effective review and monitoring of the Strategic Policies and Land Allocations DPD will be crucial to its successful delivery and is critical in understanding its effectiveness. We are pleased to see regular reviews of the local plan are scheduled.