

# **CARNFORTH NEIGHBOURHOOD PLAN**

## **LANCASTER CITY COUNCIL RESPONSE TO REGULATION 16 CONSULTATION**

**February 2022**

## 1. INTRODUCTION

- 1.1 Lancaster City Council welcomes the submission of the Carnforth Neighbourhood Plan and recognises the significant amount of time, effort and work which have been undertaken by the local community in its production to date, taking a positive and proactive approach to plan-making. The City Council have been fully supportive of the Carnforth Town Council's decision to prepare a neighbourhood plan for their area and have provided as much resource and support as possible to aid the Town Council's preparation of the plan.
- 1.2 Through dialogue with the Town Council, the City Council have been aware of the wide variety of consultation events that have been held with the community to identify issues which are important in the locality, gain consensus and draw conclusions to how such matters can be addressed. It is in this context that the Council seeks to provide constructive comment on how the plan should be refined further to ensure that the basic conditions of neighbourhood planning can be achieved.
- 1.3 For ease of reference, the comments set out in Section 4 of this response are according to the relevant sections of the Plan (referred to as 'the Plan' from this point forward). Some comments which are made, particularly where they relate to a contextual nature, may cover more than one topic or section and should be seen in this context.

## 2. LEGAL REQUIREMENTS AND NATIONAL POLICY

### Legal Requirements

- 2.1 Before the Plan can proceed to Referendum, it must be first tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the draft plan must meet are as follows:
  - (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,
  - (b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,
  - (c) Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,
  - (d) The making of the order contributes to the achievement of sustainable development,
  - (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),
  - (f) The making of the order does not breach, and is otherwise compatible with, EU obligations, and
  - (g) Prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.

### National Planning Policy

- 2.2 The National Planning Policy Framework<sup>1</sup> (referred to as 'the Framework' from this point forward) sets out the Government's planning policies for England and how these are expected to be applied. In doing so, it sets out the requirements for preparation of neighbourhood plans and provides communities with the power to develop a shared vision for their neighbourhood and deliver sustainable development that they need and to assist in the overall delivery of strategic housing needs.

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<sup>1</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

- 2.3 At the heart of the Framework is the presumption in favour of sustainable development. For plan-making this means that the plan makers should positively seek opportunities to meet the development needs of their areas and that Local Plans should meet objectively assessed needs (OAN) for housing, with sufficient flexibility to adapt to rapid change. This requirement is also applicable to the preparation of neighbourhood plans.
- 2.4 Paragraph 13 of the Framework further sets out that neighbourhood plans should support strategic policies contained in local plans for housing and economic development and plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the district-wide Local Plan.
- 2.5 Within the overarching roles that the planning system ought to play, the Plan should also have regard to the core planning principles that underpin plan-making set out in paragraph 16 of the Framework.
- 2.6 The core planning principles seek to ensure that a neighbourhood plan sets out a clear and positive vision for the future of the area and policies contained within it should provide a practical policy framework within which decision on planning applications can be made with a high degree of predictability and efficiency by the local planning authority. Paragraph 29 of the Framework states, *'Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies'*.

### **3. LANCASTER DISTRICT LOCAL PLAN**

#### **Adopted Planning Position**

- 3.1 Lancaster City Council adopted a new Local Plan for Lancaster district in July 2020. The Local Plan consists of two key components, The Strategic Policies and Land Allocations Development Plan Document (SPLA DPD) which sets out a series of strategic policies which will guide future development, in terms of scale, location and growth. The SPLA DPD also contains a series of land allocations to identify where future growth needs will be met and land which has been protected for its environmental, social or economic value. The second part is the Development Management Development Plan Document (DM DPD) which sets out a series of generic planning policies which are used by the Council to determine planning applications. The policies of the DPDs are applicable to all development proposals across the entire district (unless the plan directs otherwise).
- 3.2 The Arnside and Silverdale Area of Outstanding Natural Beauty DPD was adopted in March 2019 and includes bespoke policies in relation to the AONB.

#### **Strategic Policies and Land Allocations DPD**

- 3.3 Policy SP3 (Development Strategy for Lancaster District) of the SPLA DPD sets out the development strategy for Lancaster district. The policy aims to meet the development needs of the district by promoting an urban-focussed approach towards development, supplemented with additional large strategic development sites in greenfield locations. The development strategy is further supported by policy SP2 (Lancaster Settlement Hierarchy) which sets out a hierarchy of settlements. Carnforth is identified as a Market Town within policy SP2. Policy SP2 states that 'these will play a supporting role to the Regional Centre and will accommodate levels of new residential and economic development to serve more localised catchments.' Carnforth is therefore considered as a location

where growth is supported. Policies SG11 (Land at Lundsfield Quarry, South Carnforth) and H1 (Residential Development in Urban Areas) allocate land at Lundsfield Quarry for approximately 250 homes.

#### **Development Management DPD**

- 3.4 The DM DPD was also adopted at the end of July 2020. It provides detailed planning policies to shape the delivery of development.

#### **Arnside and Silverdale Area of Outstanding Natural Beauty DPD**

- 3.5 Paragraph 176 of the Framework, places 'great weight' to the conservation and enhancement of Areas of Outstanding Natural Beauty and states that 'development within their setting should be sensitively located and designed to avoid or minimise adverse impacts in the designated areas.' The Arnside and Silverdale AONB Development Plan Document is part of the statutory Local Plan. It sets out policies specific to the AONB and should be taken into account when assessing proposals that may affect the setting of the AONB.

#### **Landscape, Habitat Designations, Heritage and Environmental Designations and Local Policies**

- 3.6 Carnforth is bound by Greenbelt to the south and west and the Arnside and Silverdale AONB to the north. Policies EN4 (The North Lancashire Greenbelt) and DM50 (Development in the Greenbelt) address the greenbelt in accordance with national policy. Policy EN2 (Areas of Outstanding Natural Beauty) highlights the importance of landscape character and visual amenity for development within and in the setting of the AONB. Policy EN4 (Local Landscape Designations) allocates three areas of Urban Setting Landscape around Carnforth and seek to conserve their important natural features.
- 3.7 Morecambe Bay to the east is protected for its habitat importance and as such is designated a RAMSAR site, Special Area of Conservation, Special Protection Area and Site of Special Scientific Interest. There are also several Biological Heritage Sites within Carnforth. Policies EN7 (Environmentally Important Areas) and DM44 (The Protection and Enhancement of Biodiversity) address this issue.
- 3.8 There is a Conservation Area in central Carnforth, policy DM38 (Development affecting Conservation Areas) requires development to preserve or enhance this area.
- 3.9 Central Carnforth is designated as an Air Quality Management Area in order to improve air quality. Policy EN9 (Air Quality Management Areas) seeks to ensure that new development within the AQMA and development which may affect it does not contribute to increasing levels of air pollution.

#### **Role of Neighbourhood Planning**

- 3.10 Policy DM55 within the Development Management DPD clearly sets out the City Council's expectations for neighbourhood planning. Policy DM55 states the following:

## **POLICY DM55: NEIGHBOURHOOD PLANNING**

**The Council will support and assist the relevant qualifying organisation to positively prepare a Neighbourhood Plan that delivers new development and facilities for their community. Neighbourhood Plans should seek to achieve the following:**

- I. Identify how they are positively contributing towards the strategic objectives of the local development plan and by in general conformity with its strategic approach and strategic policies;**
- II. Clearly set out how they will promote sustainable development, at the same level or above that which would be delivered through the local development plan; and**
- III. Have due regard to relevant information on local needs for new homes, jobs and facilities for their plan area.**

**The Council will seek to support and assist Neighbourhood Planning groups in meeting the criteria above and the wider basic conditions set out in the Neighbourhood Planning Regulations.**

**Once a Neighbourhood Plan has been adopted by the Council it will form part of the Local Plan for the district and will be a material consideration in determining planning applications.**

### **Climate Emergency Review of the Local Plan (CERLP)**

- 3.11 On 30<sup>th</sup> January 2019, the Council declared a climate emergency. Whilst the newly adopted Local Plan does seek to address climate change, it was too far advanced in the plan preparation process to incorporate some of the actions and directions of the climate emergency declaration. The CERLP has a specific remit to amend and add to policies which can influence the Council's response to climate change, such as energy efficiency, renewable energy, water management and sustainable transport. It does not reconsider site allocations, housing numbers or other principles within the adopted Local Plan. It is therefore important to note that this represents a partial review.
- 3.12 The Council are seeking to make swift progress on this partial review of the Local Plan, consultation on the scope of the review was undertaken in Autumn 2020, with the Regulation 18 consultation on a suite of draft policies taking place over the Summer of 2021. The Council published the Local Plan under Regulation 19 for consultation on the 31<sup>st</sup> January, with the intention to submit the Plan later this year, with anticipation of adoption in 2022.
- 3.13 In advance of Submission, Public Examination and the receipt of an Inspectors Report, the level of weight which should be applied to the content and direction of the Review should be limited and considered in the context of Paragraph 48 of the Framework. However, it is important to bear in mind that this is the emerging local planning policy context for the Lancaster district and the relevant weight (as set out in paragraph 48 of the Framework).

#### **4. CARNFORTH NEIGHBOURHOOD PLAN**

- 4.1 This section sets out the comments which the City Council have on the Plan. The Council recognise and welcome amendments which have been made to the Plan in light of responses made at previous stages.
- 4.2 The Plan sets out a positive approach to development within the neighbourhood plan area, whilst at the same time recognising the constraints upon development posed by the Green Belt and habitat designations. It provides for growth for Lancaster district acknowledging the land allocated and recent planning permissions. However, given its context as a sustainable market town, by constraining the house types to be delivered, it is not considered that the Plan will adequately meet the identified housing needs that the Local Plan expects to be delivered for Lancaster district. Various recommendations for amendments are made below which it is considered will address this issue and other matters, thereby ensuring that the approach taken in the Plan is realistic and appropriate.
- 4.3 There are some references to previous Frameworks within the Plan which should be updated.
- 4.4 Where a policy, project/aspiration in the Plan is not referenced in this response, the City Council have no objections to the content and direction of the policy or aspiration.

##### **Meeting the SEA/HRA Requirements**

- 4.5 The Plan is accompanied by an SEA and HRA Screening Opinion. These were prepared by the Council in May 2021. The reports concluded that following the inclusion of Policy ENV1 (Local Biodiversity, Landscape and Character) the Plan is unlikely to result in significant environmental effect. This was supported by the three SA bodies.
- 4.6 It should be noted that a further amendment was made to the HRA Screening Opinion in September 2021. This was done to reflect the policy numbering in the Plan. The overall conclusion and assessment remained unchanged from that contained in the May 2021 document. The three SA bodies were made aware of the changes and no further comments were submitted.

##### **Vision and Objectives**

- 4.7 Section 2 Carnforth 'today' and 3 Carnforth 'tomorrow' provide a useful overview of the context in which the Plan has been prepared.
- 4.8 The City Council support the vision and the objectives of the Plan which are consistent with the spatial strategy for the district. They promote heritage, tourism, sustainable transport, meeting housing need, employment, green infrastructure and habitats and flood resilience, all of which reflect the strategy and policies within the Local Plan.

##### **Chapter 4 – Heritage and Design**

###### **Policy CNDP HD1: Conserving the Historic Environment**

- 4.9 In bullet points 2 and 3 it would be more appropriate to reflect the wording in the Framework and refer to the need to, sustain and enhance the significance of all heritage assets and avoid or minimise harm. Any harm must be clearly justified in relation to credible public benefits what would result.

##### **Chapter 5: Economy**

###### **Policy CNDP E1: Leisure and Tourism**

- 4.10 The content and direction of Policy CNDP E1 is generally supported in terms of the framework for improving the quality and diversity of existing tourist facilities, attractions, accommodation and infrastructure.
- 4.11 The City Council recognise the importance of Carnforth Pool to the local community and welcome the policy protection it is provided, giving sufficient flexibility for alternative uses to be considered under specific circumstances. However, the position set out in the policy does not align with the content of the final sentence of paragraph 5.8 which states *'It shall be retained and preserved.'* For consistency the final sentence of paragraph 5.8 should be removed.

#### **Policy CNDP E2: Employment**

- 4.12 The City Council have no objections to the content of this policy. However, reference should be provided in third paragraph to relevant policies of the Local Plan. The following wording is suggested

*"...and do not cause harm to residential amenity and confirm to the relevant policies within both this plan and the district-wide Local Plan."*

#### **Policy CNDP E3: Local Centre**

- 4.13 The City Council have no objections to the content and direction of this policy. However, clarification should be provided in paragraph 3 of the policy where reference is made to 'Central Area'. It is not clear what this means – if it refers to the Town Centre (as defined in the Local Plan) this should be explicitly referred to within the policy in order to provide clarity to the reader.

### **Chapter 6 – Access and Movement**

#### **Policy AM1: Active travel**

- 4.14 The City Council supports the direction of the policy as it reflects the approach being taken in the CERLP in terms of encouraging sustainable travel and reducing impacts on the AQMA. It is suggested that reference is made within the policy itself to the need for good design. Local Transport Note 1/20 is referenced in paragraph 6.9 but this could also be referenced in the policy. This would reflect the approach taken in the CERLP under Policies DM62: Vehicle Parking Provision and Electric Vehicle Charging Points and DM61: Prioritising Walking and Cycling.

#### **Project/Aspiration CNDP AM(a): Cycle infrastructure**

- 4.15 The suggested routes are welcomed but priority should be given to the existing strategic routes identified under Policy T2 Developing the Cycling and Walking Network of the CERLP (ie Bay Cycleway and the Canal towpath). In particular consideration should be given to how the strategic routes can connect to the town centre and other trip attractors (eg schools). Suggested locations not already included are:-

- Longfield Drive (improve towpath access)
- Bridgeside (improve existing access)
- Canal Turn (potential access through third party land to Lancaster Road)
- Yealand Grove canal bridge (towpath access from public footpath)

- 4.16 Also to be considered in terms of a new cycle route and/or as an improved pedestrian access to the town centre is the Crag Bank Road/Albert Road public footpath.
- 4.17 Clarification should be provided under 'Improved routes' final bullet: To Warton. As far as the City Council is aware this is an aspiration associated with the Warton Mires project and included land outside their ownership. It is suggested the wording is amended to 'To Warton along Warton Road or via Millhead'.

4.18 Reference should be made to the emerging Local Cycling and Walking Infrastructure Plan. This is being developed by the County Council and will identify and help deliver cycling and walking infrastructure in the district.

**Policy CNDP AM2: Charging points for electric vehicles**

4.19 The direction of policy AM2 is supported as air quality is a recognised issue in Carnforth, particularly in the town centre where an Air Quality Management Area (AQMA) has been declared.

4.20 Through the CERLP, the Council has reviewed policy DM62 (Vehicle Parking Provision and Electric Charging Points) to set out requirements for the provision of electric vehicle charge points. Like policy DM62 of the CERLP DMDPD, policy AM2 in this Plan, seeks to require 1 charge point to be provided for each dwelling with an associated space, and this includes flats. However, where the parking is communal (residential and non-residential) the policy DM62 of the DMDPD seeks a requirement for 20% of spaces to be provided with an electric charge point installed. To ensure that once the CERLP is adopted the Plan conforms with the requirements, it is recommended that the following is added to the end of the first paragraph in policy AM2:

*“.... in accordance with policies in the Local Plan.”*

**Project/Aspiration CNDP AM(b): Market Street and town centre public realm improvements**

4.21 The City Council have no objections to the content and direction of these aspirations.

4.22 Clarification should be provided under paragraph 6.23. Reference is made to the Land to the south of Windermere Road and that the proposed development included a link road between Back Lane and the A6. The proposal considered in the Local Plan, and subsequently removed following the Inspector’s report, provided a vehicular access from Back Lane and not from the A6.

**Project/Aspiration CNDP AM(c): Improving town-wide accessibility**

4.23 The City Council have no objections to the intentions of these aspirations to improve air quality and conditions for pedestrians and cyclists in the town centre by removing traffic from the town centre, recognising that at the moment, with no mechanism in place as to how they could be delivered, they remain aspirations.

**Chapter 7: Housing**

**Policy CNDP H1: Housing & CNDP H2: Housing Mix**

4.24 Carnforth is a focus of growth in the Local Plan and is expected to contribute to the needs of the district. Given the status of Carnforth in the Local Plan, requiring new housing to meet a specific Carnforth need does not appear to be in conformity with the Local Plan.

4.25 There are concerns over the methodology and the outcome of the Carnforth Housing Needs Assessment. Whilst there is a need for one and two bed dwellings, and this will help meet a specific need it does not address that of families. The delivery of predominantly one and two-bedroom homes would fail to address the wider district housing need. For Carnforth, the Lancaster City Council Strategic Housing Market Assessment (2018) identifies a similar level of need for 1/2 bedroom affordable homes as for 3 plus bedroom affordable homes. For market homes the aspiration/expectation is predominantly for 3-bedroom homes.



4.26 The SHMA recommends the use of a district wide housing mix which is included at table 4.1 of the Local Plan.

Property Type	Market (%)	Affordable (%)
House (2 bedroom)	20	30
House (3 bedroom)	35	20
House (4+ bedroom)	25	5
Bungalow	10	10
Flat/apartment (may include 1 bedroom houses)	10	35

Table 4.1: Table to show the indicative approach to housing mix across the District (Lancaster CC 2018)

4.27 It is recommended that the Lancaster Strategic Housing Market Assessment (2018) or future SHMA is also referred to within policy CNDP H1 and reference to specific house types within policy CNDP H2 is removed and the evidence documents referred to in their place.

4.28 The SHMA can be found using the following link:

<https://www.lancaster.gov.uk/planning/planning-policy/evidence-monitoring-information>

## **Chapter 8. Environment and Community**

### **Policy CNDP EC1: Local Biodiversity, Landscape and Character**

4.29 Whilst the overall direction of Policy CNDP EC1 (Local Biodiversity, Landscape and Character) is supported the policy would benefit from some minor amendments to add clarity. This is mainly in relation to the third paragraph of the policy which states that development proposals should conserve or enhance biodiversity. The City Council would note that it should not be an either/or in relation to conservation and enhancement. Proposals should look to deliver both. This paragraph should be reworded to make this clear.

4.30 The aspiration for development to deliver 10% Biodiversity Net Gain is supported. This will be a mandatory requirement from November 2023. The Policy does not stipulate this as a requirement noting only that proposals should aim to achieve 10%. The policy notes the preference for on-site delivery followed by off-site delivery where this is not possible. Where off-site delivery is proposed the Policy advises that this will be sought within the Plan area. It would be helpful to both future applicants and the City Council as decision makers if potential off-site projects could be identified. This would provide a clear direction of where future off-site delivery is best directed.

4.31 The Policy would benefit from reference to the Arnsdale and Silverdale AONB and the need to have regard to setting of this designated landscape when considering future proposals located within the Plan area.

### **Project/Aspiration CNDP EC(a): Local Green Spaces**

4.32 The future aspiration to identify Local Green Spaces as part of any future review of the Plan is supported by the City Council. This should follow the Local Green Space methodology used by the City Council in identifying and designating Local Green Spaces in the Local Plan.

- 4.33 In relation to paragraph 8.6 of the supporting text, it should be noted that as part of the CERLP policy SC4 has been re-named as 'Green and Blue Corridors and Chains', so it is recommended that the following text is added after reference is made to policy SC4:

*"... or its successor policy in the emerging Local Plan."*

**Project/Aspiration CNDP EC(b): Remediation of disused tip adjacent to Midland Terrace**

- 4.34 The City Council have no objections to the content and direction of this aspiration. Through the CERLP, which has been informed by the district's Green and Blue Infrastructure Strategy, the Council promotes the multi-functional value of the districts green and blue assets, where appropriate. The aspiration recognises the need for any access that is explored to be sensitive given the site is designated as a Biological Heritage Site, and in particular, regard should be given to policy DM44 of the Development Management DPD.

**Policy CNDP EC2: Development adjacent to parks**

- 4.35 The City Council supports the content and direction of this policy but recognises that it is very similar to the current policy wording of DM27 (Open Space, Sports and Recreational Facilities) which states: "Development proposals that are adjacent to designated spaces, sports and recreational facilities will be required to incorporate design measures that ensure that there are no negative impacts on amenity, landscape value, ecological value and functionality of the space. The Council will only permit development that has identified negative impacts on open space, sports and recreational facilities where appropriate mitigation measures have been provided." However, from the current wording of the Plan policy CNDP EC2, it is understood that this does not just apply to designated open spaces and provides further detail on the arrangement of buildings and importance of access. The title of this policy could also perhaps better reflect that this policy does not only relate to parks, but other types of open spaces.

**Policy CNDP EC3 Sustainable Housing**

- 4.36 The policy would benefit from additional amendments to distinguish expectations for residential/non-residential developments. The following wording is suggested:

*"Applications for non-residential development are encouraged to demonstrate accordance with the appropriate BREEAM standards in use at the time of submission. Encouragement is also given to residential schemes that meet Passivhaus standards."*

- 4.37 This would align better with the direction within policy DM30a of the CERLP which seeks to set out carbon reduction standards for residential development and the use of BREEAM for non-residential development.

**Appendix 3 – Monitoring Framework**

- 4.38 The inclusion of guidance on how the Plan will be monitored is welcomed. It is recommended that the monitoring report be prepared annually for consideration by the Town Council. This would ensure that the Town Council is aware of the effectiveness of policies with opportunity for action should this be required.

## 5. DESIGN CODE

- 5.1 The Design Code has not been updated to address previous comments and includes references to out-of-date policy documents. These references will need to be updated to refer to the most up to date Framework and the adopted Local Plan policy documents. The policies referred to will also need amending to reflect those now mentioned in the Plan and as noted above. It would also be worthwhile referring to the Climate Emergency Review of the Local Plan.
- 5.2 The boundary of Site 1: Lundsfield Quarry should be amended to mirror the boundary of the allocated site.
- 5.3 The existing Lancaster City Council 'Shopfronts SPD' and 'Shopfront Security in Conservation Areas Advice Note' describe a hierarchy of options prior to using shutters including security glass, reduction of glazing etc. The conservation advice note on shopfront security in conservation areas is also more discouraging than the section in the Plan. The advice note outlines that external shutters may be acceptable in exceptional circumstances before providing a set of criteria which must be met for them to be accepted. Therefore, the wording in the Design Code could better emphasis that they are only accepted in exceptional circumstances. The following wording is suggested:
- 5.4 The addition of external shutters will require planning permission and may only be acceptable in exceptional circumstances. Other alternatives should be ~~may also be~~ considered and could include: security glass with alarm of internal cameras; a reduction in the size of window glass; internal see-through shutters; and external shutters that are removed during working hours. The use of solid roller shutter blinds, which lead to a very unattractive environment when closed, should be discouraged. The use of open roller grills, removal grills or internal grills and meshes are preferred since the shop display can still be seen, enhancing the perception of the street outside working hours. It is recommended that roller shutters and grills are integrated into the design of the shop and not additional items, non-contributing to the building appearance.

## 6. DESIGN STANDARDS AND PRACTICES FOR WALKING AND CYCLING IN CARNFORTH

- 6.1 The document has not been updated to address previous comments. Paragraph 3.2.25 of the Design Standards and Practices for Walking and Cycling in Carnforth refers to the South Carnforth Development Brief. The Brief was withdrawn when the larger site was removed from the Local Plan, the reference to the brief should be deleted.

## 7. CONCLUSION

- 7.1 The City Council recognise the role of neighbourhood plans as a tool for local people to shape the development of their local community. The City Council have welcomed the opportunity to discuss the evolution of the Plan with regard to the Carnforth Neighbourhood Plan Area and recognise the significant effort which has been put into its preparation by the local community.
- 7.2 Notwithstanding this, the City Council considers that there are some outstanding issues that have been highlighted within this response and these need to be addressed and revisited. In order to meet these requirements, the City Council have suggested a number of modifications and points for clarity to the Plan to assist with the Examiner and Town Council's considerations. On the whole the City Council supports the policies within the Plan and considers that they are in conformity with

national planning policy, the adopted Local Plan and emerging Climate Emergency Review of the Local Plan, subject to the recommended changes being made.

- 7.3 Should the Examiner require further information, evidence or discussion on any of the matters raised in this response the City Council will be happy to assist in this matter.