

Agenda Item	A5
Application Number	23/01384/OUT
Proposal	Outline application for the erection of up to 130 dwellings and associated infrastructure with access, road realignment/widening to part of Slyne Road and associated engineering work.
Application site	Land off Powder House Lane Lancaster Lancashire
Applicant	Mr Warren Cadman, Wrenman Strategic Land Ltd
Agent	Dan Ingram, Stantec
Case Officer	Mrs Jennifer Rehman
Departure	Yes
Summary of Recommendation	Approve subject to conditions and completion of Section 106 Agreement. Delegate back to Chief Officer Planning and Climate Change to finalise legal agreement.

(i) Procedural Matters

This application was submitted in December 2023 for up to 200 dwellings with associated infrastructure, access and road realignment to Slyne Road. In June 2025 the proposal was amended with the quantum of development reduced to up to 130 dwellings. This is in response to changes in national and local planning policy as well as addressing previous flood risk, ecology, landscape and design concerns.

(ii) The Planning Regulatory Committee visited the site and its surroundings on 21 July 2025.

1.0 Application Site and Setting

- 1.1 The site comprises 10.37 hectares of agricultural land, subdivided into field enclosures by native hedgerows and boundary trees or watercourses. The site is located on the eastern edge of the existing built-up area of Torrisholme, approximately 800m to Torrisholme local centre, around 2.8km to Morecambe Town Centre to the west and around 2.5km north-west of Lancaster city centre.
- 1.2 The site straddles two parishes. The western half of the site is located in the parish of Morecambe (Torrisholme Ward) and the eastern half situated within the Slyne with Hest parish (Bolton & Slyne Ward).
- 1.3 The site is bound by residential development along Russell Drive to the west, Powder House Lane to the east, fields and Slyne Road to the north, and an existing pedestrian/cycle track which runs alongside the Bay Gateway to the west. The site is separated from Lancaster Road (to the southwest) by third party land that, in part, provides habitat enhancements associated with the delivery of the Bay Gateway. Part of this land, adjacent to Lancaster Road, is protected amenity greenspace (Russel Drive Amenity Green Space).

- 1.4 Existing access into the site is provided off Powder House Lane via existing field gates to the east and an access on the southern boundary via third party land. There are no formally designated public rights of way adjacent to or crossing the site.
- 1.5 A high voltage electrical line traverses the site with the supporting pylon located roughly in the centre of the site. A gas main runs along the western boundary parallel with Russell Drive. This is not a high-pressure gas main.
- 1.6 The site is relatively low-lying with an undulating topography. The high point within the site is to the north (east of the powerlines) on a shallow mound which has an elevation of approximately 12.5 metres Above Ordnance Datum (m AOD). From this high point, levels fall in all directions to around 10m AOD. At the location on the proposed access (on Slyne Road) the elevation is around 9.5m AOD, falling to the low point (6m AOD) at the southwestern end of the site.
- 1.7 The site is currently located in Flood Zone 1 with the watercourses running through the site classified by the Strategic Flood Risk Assessment (SFRA) as Flood Zone 3B. The SFRA also identifies the site to be at risk of flooding from other sources now and in the future, including surface water flooding, groundwater flooding and future tidal flooding.
- 1.8 Torrisholme Barrow lies to the northwest of the site. This is a distinct drumlin feature which is approximately 40m AOD and is prominent in the local area. It is also an archaeological feature at the top of the hill which is designated as a Scheduled Ancient Monument. Aside from this nationally significant designated heritage asset, there are no other designated heritage assets close to or adjacent to the application site.
- 1.9 Land between the existing built-up area of Morecambe and the railway line was formerly located within the North Lancashire Green Belt. This included the proposed site. This designation was removed when the Local Plan was adopted in 2020 following the Green Belt Review. The boundary of the Green Belt now lies to the east of the adjacent railway line.
- 1.10 The site now forms part of a larger local landscape designation (Key Urban Landscape (KUL)) which wraps around Torrisholme Barrow and is bound by the existing railway line, the Bay Gateway and existing development to the east of the site and the Barrow itself. The Local Plan includes the site within the Countryside Area but also includes the site within the Urban Boundary. In respect of the latter there is no corresponding policy to support this demarcation.
- 1.11 Morecambe Bay and the associated statutory nature conservation sites comprising the Special Protection Area (SPA), Special Area of Conservation (SAC), Site of Special Scientific Interest (SSSI) and Ramsar Site, is located within 1.4km northeast of the site.
- 1.12 Parts of the site are also located within a Mineral Safeguarding Area and within the Air Quality Management Zone linked to Lancaster City Centre Air Quality Management Area. The site is also classified as Grade 3a and 3b (Good to Moderate) agricultural land.

2.0 Proposal

- 2.1 The applicant, Wrenman Strategic Land Limited, seeks outline planning permission for up to 130 dwellings and associated infrastructure with access, road realignment /widening to part of Slyne Road and associated engineering works. Full planning permission is sought for the access arrangements required to serve the development site. Layout, landscaping, scale and appearance are reserved for subsequent approval, herein “the reserved matters”.
- 2.2 The application is supported by an Environmental Statement (ES) which covers an assessment of significance in relation to the following topics:
- Air Quality
 - Noise
 - Landscape and Visual Effects

- Transport and Access
- Ecology
- Cultural Heritage
- Water Resources and Flood Risk

Other standalone technical reports support the application which are to be read alongside the ES, the ES Addendum and the submitted plans. The ES was submitted voluntarily by the applicant. The initial screening was for residential development over 500 units. The applicant did not re-screen their proposal for up to 200 dwellings ahead of their initial submission. With the proposal reduced to up to 130 dwellings, it is unlikely the local planning authority would have considered this development EIA development had the proposal been resubmitted. Nevertheless, an ES accompanies the application and as such it has been determined on this basis, with regard to the EIA regulations.

2.3 The ES Addendum (May 2025) addresses changes in policy and evidence related to flood risk. With the exception of the Noise, Air Quality, and Transport chapters, all chapters of the original Environmental Statement (ES) have been updated. The chapters that have not been updated are considered to remain valid, as the proposed amendments reduce the scale of development and its associated impacts — thus the original assessment represents a worst-case scenario. Officers have reviewed and agreed upon the scope of the ES Addendum.

2.4 The application has been amended during an extended determination period and has reduced from up to 200 dwellings to up to 130 dwellings in response to flood risk, biodiversity and design considerations. The amendments also address changes in national and local planning policy that have occurred while this application has been under consideration. The amended scheme provided further information and additional information (in the context of the EIA regulations) which has been incorporated into an addendum ES.

2.5 A Parameters Plan has been submitted for approval to fix the location of built residential development and associated green infrastructure. The built development equates to 3.52ha of the site and will include all the residential development, associated roads, active travel infrastructure, easements associated with the powerlines, amenity open space and some drainage infrastructure (SuDS). The Green Infrastructures equates to 6.85ha and shall include public open space, drainage (SuDS) infrastructure, ecology mitigation and enhancement (BNG) along with existing utility easements. The application is supported by a Green and Blue Infrastructure Strategy Plan.

2.6 Access is a matter to be considered in full. The proposal includes a single vehicular access / egress off Slyne Road. The access comprises a 7.3 metre wide carriageway and 8 metre kerb radius with visibility splays of 43 metres in both directions. The junction design (as amended) incorporates a ghost island right turn lane and the realignment of Slyne Road between the proposed junction and Hexham Road. This enables the provision of a continuous 2m wide footway on the south side of Slyne Road.

2.7 A 6 metre wide emergency access is proposed onto Powder House Lane, approximately 50m north of the shared cycleway/footway which runs alongside the southern boundary of the site. This access shall incorporate dismountable bollards to prevent misuse of the access.

2.8 Active travel connections are also proposed as part of the main vehicular access, the emergency access and a separate access in the south-west corner of the site connecting to the existing footpath that runs east-west along the southern boundary of the site leading to Lancaster Road. The submission indicates this will be upgraded by improved surfacing, lighting and access restrictions.

2.9 The proposal includes the provision of affordable housing and on-site public open space, along with associated infrastructure, such as internal estate roads, servicing and the provision of a sustainable drainage scheme. Earthworks are anticipated to form the proposed attenuation basins, development platforms and to mitigate against future tidal flood risk.

2.10 The Design and Access Statement includes an illustrative plan which has been provided to demonstrate one way in which the site could be developed based on the Parameters Plan. This is not for approval.

3.0 Site History

- 3.1 The site has a very limited planning history with only an EIA Screening Opinion request made by the applicant last year for a larger residential proposal on the site. Development associated with the Bay Gateway is of interest, but these historic consents bear little relevance to the proposal, other than assessing the relationship between the proposal and highway network.
- 3.2 There was a planning application for 129 homes off Fulwood Drive (by Oakmere Homes) which is of relevance to this proposal. Despite the officer recommendation of approval, the application was refused at Planning Committee and subsequently dismissed by the Planning Inspectorate.
- 3.3 It is noted that the site falls within LPSA ref: 712 Land west of Railway Line, as identified within the Strategic Housing and Employment Lane Availability Assessment (SHELAA), 2018, which forms part of the evidence base for the Local Plan. LPSA ref 712 relates to a much wider site area but excludes the area which forms the Drumlin and the Barrow. Within the SHELAA it states, '*The landscape is considered to be able to accommodate development although careful consideration will need to be given to the setting of Torrisholme Barrow.*' Notwithstanding this, the Local Plan continued to allocate the wider area, including the application site, as a Key Urban Landscape.
- 3.4 A summary of this planning history is set out below:

Application Number	Proposal	Decision
22/01211/EIR	Screening opinion for the erection of up to 600 dwellings and associated works.	Environmental Statement required
21/01341/OUT	Outline application for the development of 129 residential dwellings and creation of new access (<i>this relates to the site off Fulwood Drive by Oakmere Homes</i>)	Dismissed at appeal
11/01149/IPC	Application for a Development Consent Order by the Infrastructure Planning Commission pursuant to section 56 of the Planning Act 2008 : The Lancashire County Council (Torrisholme to the M6 link (A683 Completion of Heysham to M6 Link Road)) Development Consent Order	Permitted
05/01584/CPA	Construction of a new highway - Completion of Heysham to M6 Link and improvements to existing highways.	Approved by Secretary of State
4.0	Consultation Responses	
4.1	The following responses have been received from statutory and internal consultees:	

Consultee	Response
Slyne with Hest Parish Council	<p>Objection. A summary of the grounds for opposition are as follows (based on the original and amended (2025) proposals:</p> <ul style="list-style-type: none">• Unsuitable access – strong objection to the access on Slyne road. The development would be best served by the Bay Gateway.• Traffic will turn right at the access onto Slyne Road/Hasty Brow to access the A6 corridor, rather than left towards Torrisholme. This road does not have the capacity to support additional traffic and is congested and dangerous in some sections. It also routes traffic through the village of Slyne.• Additional traffic will exacerbate existing congestion through the centre of Torrisholme at rush hour.• Poor access to public transport from Slyne Road given lack of footways on Slyne Road/Hasty Brow and difficult to see how new public transport services could serve the site, given narrow carriageway widths.• Inadequate emergency access.

	<ul style="list-style-type: none"> • Loss of the Green Belt status is mourned by all. Objection to any attempt at allowing urban sprawl to creep into the Parish's villages by removing the greenbelt status of the land. • Loss of open feel of the land, loss of natural habitat, loss of wetland and impacts on ecology. • Increased flood risk – watercourse and flooding issues to be addressed. • Redirecting watercourses could cause potential flooding issues. • Drainage system through Torrisholme at full capacity. Adding homes to the system will only cause more problems unless new drainage systems are provided for the whole area. • Infrastructure needed to support the development is not in place. • Object to any attempt to allow urban sprawl creep into the village removing greenbelt status of land that surrounds the parish.
Morecambe Town Council	<p>Objection. A summary of the grounds for opposition are as follows:</p> <ul style="list-style-type: none"> • The site is designated as Key urban Landscape (KUL) and Open Countryside in the Local Plan and should be determined in this context. • Development in the Open Countryside is not consistent with the development strategy for the district (policy SP3). • The issue of re-aligning the Green Belt in the Torrisholme area was well-explored as part of the Hearing Sessions of the Local Plan Examination. The Inspector's Report supported the amended boundary and noted that its removal did not mean that it would be identified for development purposes and would instead be designated as Key Urban Landscape under Policy EN5. • The proposed development would clearly be contrary to the designation of the site a KUL and would significantly reduce the extent and function of this valuable local landscape designation at this location. • The Town Council does not support the view that the site makes a very limited contribution to the purposes of the KUL and contends any development of the KUL would impact the integrity of this designation. • During the Local Plan making process (SHELAA, in considering this site Lancaster City Council concluded that whilst potentially developable the local landscape designation should be applied. This decision was made having regard to the Council's housing land supply position and wider development strategy for the district and was supported by the Planning Inspector. • The application site is located within the ward of Bolton-le-Sands which falls within Rural West therefore 30% affordable housing is required. The applicant is proposing 15% subject to viability at reserved matters stage and therefore does not accord with policy DM3. • The land regularly suffers from floods as a result of rainfall, inadequate land permeability and an overwhelmed drainage system. The FRA underestimates this risk therefore the measures proposed to ameliorate the risk must be inadequate. • Proposed mitigation is unlikely to reduce the harm arising from the development on the Scheduled Monument significantly. • The site's location on the edge of the urban area is relatively remote from many services such as schools, employment areas and health facilities. The site is in excess of the recommended walking distances set out in the IHT guidance. The indicative layout plans do not prioritise walking and cycling and therefore would be contrary to policy DM60. • Development of the site undermines confidence in the forward planning process and therefore the scheme should be refused for the significant harm identified.
Planning Policy Team (City Council)	<p>Having regard to the housing supply position and the positive contribution the development would make to meeting the housing needs of the district, the policy team make the following conclusion:</p> <p>The site is designated as Open Countryside and allocated KUL in the recently adopted Local Plan and as such is not somewhere where the council would support development. Given the site's sensitive location and adopted open countryside and</p>

	<p>local landscape designation the adverse impacts of developing this site, protected from development in a very recently adopted Local Plan, would significantly and demonstrably outweigh the benefits.</p> <p><i>No comments following the June 2025 re-consultation.</i></p>
Local Highway Authority	<p>No objection. Following the submission of the applicant's Post Submission Highway Note, all previous concerns have been addressed, save for the impact on the wider network. Following re-consultation of the June 2025 amendments, the highway authority has confirmed no objection to the development, subject to a contribution of £570,266 towards wider transport infrastructure at the following named initiatives (based on £4,386.66 per dwelling):</p> <ul style="list-style-type: none"> ➤ City Centre Gyratory ➤ A6 Slyne Road (other Feeder Roads) ➤ Local highway network around Junction 34 ➤ Lancaster Area Wide Local Road/Management Changes ➤ Morecambe Area Wide Local Road/Management Changes <p>and the following conditions:</p> <ul style="list-style-type: none"> • Construction Method Statement • Wheel washing facilities • Scheme for the construction of the site accesses and off-site highway mitigation including: <ul style="list-style-type: none"> ○ Site access on Slyne Road (carriageway and footway improvements and extension to extension of 20mph limit) ○ Powder House Lane (Emergency and active travel restrictions and resurfacing) ○ Active travel connection to B5321 from south-west corner of the site including surfacing, street lighting and signage) ○ Bus stop enhancements on Lancaster Road • New roads to Lancashire County Council's adoptable standards and surfaced to base course to the entrance to the site compound before development takes place. • Interim Travel Plan • Management and Maintenance of proposed streets.
National Highways (NH)	<p>No Objection - Following the submission of the applicant's Highway Technical Note, National Highways' previous holding recommendation, which related to insufficient information to understand the level of traffic impact of the proposal on the strategic road network at M6 junction 34, has been removed. NH commented that the proposal in isolation (200 dwellings) would not have a material impact upon the safe operation of the Strategic Road Network (SRN) at Junction 34.</p> <p>Following the June 2025 amendments, NH note the reduced quantum of development and maintain their position of no objection.</p>
Active Travel England (ATE)	<p>No objection, subject to the local planning authority being satisfied the internal layout of the development is designed to meet the key principles of the National Design Code, Inclusive Mobility and LTN 1/20 (Cycle Infrastructure).</p>
North Lancashire Bridleways Society (NLBS)	<p>Comments as follows:</p> <ul style="list-style-type: none"> • Views of horse riders need to be taken into account, particularly given the current use of Powderhouse Lane by horse riders. • Pedestrian/cycleways in the development should be more widely accessible. Multi-use paths would be better, catering for pedestrians cyclists and horse riders and these paths should be dedicated under Section 31 of the Highways Act. • Horse riding has considerable health benefits. Equestrians should not be prevented from enjoying open air exercise and recreation by failure to provide safe routes. • Policy DM57 requires development to be designed to promote the health and well being of communities, ensuring development is designed to promote physical activity. • NLBS would be happy to engage in accessibility discussions between interested parties.
Network Rail (NR)	<p>Comments as follows:</p>

	<ul style="list-style-type: none"> • Works on this site must be undertaken with the supervision of NR via their asset protection team to ensure works do not impact the integrity, stability and safe operation of the railway and its boundary and requests planning conditions to protect the railway and its boundary. • The applicant must review the title to the property to observe any obligations, rights, exceptions and reservations for the benefit of NR's land and if the proposal would breach these obligations, the scheme must be amended. • NR state that it is imperative developers/applicants consult neighbouring/affected statutory undertakers in advance of any construction work, to identify and mitigate potential risks to both sites including people using or working on the sites, in line with CDM 2015 and HSW 1974 legislation. • It is for the developer and LPA to ensure noise and vibration from the railway and any nearby rail depots can be mitigated prior to construction. • Applications likely to generate an increase in trips under railway bridges may be of concern to NR and consultation with their asset protection team is necessary to understand if this is a problem. • A Risk Assessment and Method Statement (RAMS) is recommended as a planning condition to safeguard NR's assets and operations. • Fencing - trespass fencing to be provided adjacent to the boundary with NR's land. • Fail safe use of cranes and plant - details to be agreed with NR. • Measures addressing encroachment onto NR's land. • No overspill of lighting onto NR assets and makes several recommendations. • Glare and glint study from any solar PV panels to be undertaken considering the impacts on the existing operational railway. • Recommends a condition to address potential effects arising from impact vibration during construction. • A list of drainage recommendations are provided to ensure NR's land and operations are not impacted by the proposed drainage strategy, and recommends a drainage condition. • NR wish to review any earthworks or loading within 10m and 15m respectively of their assets and recommend a condition relating to proposed ground levels. • Guidance provided in relation to tree planting close to NR assets.
Dynamo Cycle Campaign	<p>Objection. A summary of the grounds for opposition are as follows:</p> <ul style="list-style-type: none"> • Policy DM29 requires developments to maximise opportunities for cycling and walking linkages though and to/from a site to promote sustainable healthy travel – this is not adequately covered in the developer's current plan. • Although access to the development via Powder House Lane looks reasonable on paper, the reality is different as the lane is narrow and compromised by hedgerows. It is also not enough to link to the rest of the district. <p><i>No further comments to the June 2025 amendments.</i></p>
Environment Agency	<p>No objection subject to the development proceeding in strict accordance with the submitted and amended Flood Risk Assessment (Ref: NO/2024/115788/03-L01) dated 28 February 2025 and the mitigation set out therein. The EA are satisfied the development would be safe without exacerbating flood risk elsewhere. The EA advise consultation is undertaken with the local Emergency Planning team regarding safe access and egress in flood events.</p>
Lead Local Flood Authority	<p>No objection - Following the submission of the amended information, the LLFA has now withdrawn their initial objection noting their original concerns have been overcome and an acceptable site specific FRA supports the application. In response to the June 2025 amendments, the LLFA maintain their position of 'no objection'.</p> <p>The following conditions are recommended:</p> <ul style="list-style-type: none"> • Final Surface Water Drainage Strategy based on the amended FRA (083436.500-CUR-00-XX-T-C-00001, Rev P05, Dated 9/05/2025 and Drainage Strategy and indicative surface water sustainable drainage strategy (083436.500- CUR-00-XX-T-C-00102, Rev P04, Dated 29/05/2025).

	<ul style="list-style-type: none"> • Construction Surface Water Management Plan • Sustainable Drainage System Operation and Maintenance Manual • Verification Report of Construction Sustainable Drainage System. <p>The following additional advice is provided:</p> <ul style="list-style-type: none"> • Land Drainage Consent would be required in certain circumstances and that applicants should avoid crossing, diverting and/or culverting an ordinary watercourse. • Watercourses should be protected, where appropriate enhanced, and incorporated into the design of the development. • The LLFA provide advice and information to inform the layout such as easements to the watercourse and requirements for coordinated management and maintenance of watercourses. • At detailed design stage the applicant is expected to consider the design standard tidal flood event within the surface water drainage system as well as the impact of high ground water levels. • Technical comments provided in relation to the gradient of slopes to any swales to and that all SUDS features to be included within the development site.
United Utilities (UU)	<p>No objection in principle but note insufficient information has been provided in relation to the drainage design and recommends a condition for the surface water drainage scheme and a separate condition for future management and maintenance of the approved drainage scheme.</p> <p>In response to the further information, UU note their previous comments stand. No further comments to the June 2025 amendments.</p>
Natural England (NE)	<p>No objection. Following the submission of the applicant's shadow Habitats Regulation Assessment (HRA) and addendum report, NE have raised no objection subject to securing the following mitigation:</p> <ul style="list-style-type: none"> • Homeowner packs • Landscape Ecological Management Plan (LEMP) • Provision of on-site open space
Greater Manchester Ecology Unit	<p>Following the submission of further information and amendments, GMEU have removed their objection.</p> <p>The reasons for the initial objection included:</p> <ul style="list-style-type: none"> • Insufficient assessment of the impact of the development on the designated sites - further consideration of wintering birds. • Insufficient information to be certain the development will not have an impact on GCNs. • Insufficient assessment of the potential impact on bats. • Inadequate assessment of the impact of the development on breeding birds. • Inaccurate baseline habitat baseline assessment in relation to ditches, which distorts the BNG and concerns meaningful BNG could be delivered on site. • Unacceptable loss of hedgerow loss – the hedgerows are more distinct (cultural heritage and biological value than presented). <p>Following the amendments, GMEU have confirmed no objection subject to the following requirements:</p> <ul style="list-style-type: none"> • GCN Method Statement and additional surveys (2026) if development has not commenced before Mid-April 2026. • Bats Method Statement and re-assessment (for bats) of any trees to be removed, including compensatory measures. • Prior to reserved matters stage further bird survey work and impact assessment be undertaken to inform appropriate mitigation. • Protection of nesting birds on site – limiting vegetation clearance to avoid bird nesting seasons (March – August) unless competent ecologist has undertaken assessment and confirms no harm to birds/appropriate measures in place to protect nesting birds. • Clarification of the hedgerows mapped for the BNG baseline and post-development plans.

	<ul style="list-style-type: none"> • BNG to be delivered on site (or off-site) and to be updated at reserved matters stage and will be subject to a BNG Plan and final metric to satisfy the BNG condition. • Due to significant net-gains on-site, a habitat monitoring and management plan will be required and should be secured by s106.
Arboricultural Officer	<p>Objection. A summary of the main reasons for opposition are as follows:</p> <ul style="list-style-type: none"> • Greater consideration needs to be given to the existing landscape, notably the historic hedgerows and ditches which divide the site. • The AIA indicates that a mature oak (T3) has veteran characteristics. Development resulting in the loss or deterioration of irreplaceable habitats such as veteran trees should be refused. T3 needs to be clearly identified within the proposals and suitably buffered. • No formal landscaping proposals have been submitted with this outline application. That shown on the masterplan is not sufficient to determine the impact of the development and is indicative. <p>The Arboricultural Officer notes conflicts between the AIA and the masterplan. No comments provided in response to the June 2025 amendments.</p>
Historic England	<p>No objection - Some limited additional impact on the already compromised setting of the Torrisholme Round Barrow, which would not be sufficient to justify the refusal of planning permission on heritage grounds, particularly if the mitigation measures suggested are implemented. HE has provided further comments following the appeal decision associated with the Fulwood Drive development and maintain their position. They have confirmed no changes in their position following the amendments (June 2025) to reduce the scheme.</p>
County Council Planning (Archaeology)	<p>No objection - Following the submission of the final report setting out the findings of the field investigations, the County Archaeologist has withdrawn their objection. They concur with the findings of the investigation and confirm no further archaeological work is required on site and no archaeological conditions are considered necessary. In response to the June 2025 amendments and ES addendum, changes are recommended to the text of the ES to reflect the investigations undertaken, but the overall position has not changed.</p>
Council's Conservation Officer	<p>Not providing heritage comments as there are no historic buildings or areas within the vicinity of the site. The Conservation Officer acknowledges Torrisholme Barrow is a Scheduled Monument and its setting would be affected. However, given this is an archaeological site, the significance of the barrow and the contribution of setting to that significance, is a matter for Lancashire County Council Historic Environment Team who provide archaeological advice. In response to the June 2025 re-consultation, the Conservation team has confirmed they are not commenting on this application but note this should not be construed as a 'no objection' response.</p>
Environmental Health Services (EHS)	<p>No objection, subject to the following conditions:</p> <ul style="list-style-type: none"> • Construction Environmental Management Plan • Travel Plan • EV Charging provision • Full ground gas assessment and radon hazard assessment and identification of any recommended protection measures • A detailed noise report, with noise modelling, to assess and inform the layout of the development and necessary mitigation • Hours of construction <p>In relation to contaminated land, the Environmental Health Service has reverted to the Environment Agency as a statutory consultee.</p> <p>Emissions Assessment and Concentration Assessment is required.</p> <p>Awaiting comments from June 2025 re-consultation.</p>
Lancashire Constabulary	<p>Comments - A summary of the main comments include:</p> <ul style="list-style-type: none"> • Bespoke advice to be provided at the reserved matter stage. • General recommendations include: -

	<ul style="list-style-type: none"> ○ Scheme should be designed to secure by design standards (SBD) ○ Suitable permeability integrated into design to reduce risk of crime and anti-social behaviour. ○ Public paths to be avoided to rear of gardens/yards or dwellings. ○ Where possible, paths to be at least 3 metres wide. ○ Good natural surveillance and safe access routes to public open space. ○ Secure gardens with suitable boundary treatments. ○ Building security measures (physical security/windows/alarms/lighting) ○ Landscaping and future maintenance to be carefully considered in design to maintain natural surveillance of property. ○ Site construction security required. <p>Awaiting comments from June 2025 re-consultation.</p>
Lancashire Fire and Rescue Services	No objection - Standing advice provided in relation to Building Regulations Approved Document B, Part B5 (Access and facilities for the Fire Service).
National Health Service (NHS)	No objection subject to securing a financial contribution of £101,088 towards a new health care centre for Lancaster Medical Practice in Bailing. The exact figure would need to be recalculated at reserved matters stage when the final number of dwellings is determined.
Lancashire Education School Planning Team	No objection - No education contribution required (updated 16 June 2025)
Public Realm	No objection , subject to securing the following: <ul style="list-style-type: none"> • On-site Equipped Children's Play Area • On site Young Persons Play Provision • On-site Amenity Greenspace • Off-site contributions towards outdoor sports provision at Salt Ayre towards athletics and football provision. The final sum to be calculated at reserved matters stage. At this stage the figure is £220,740.
Waste and Recycling	No objection. The Waste & Recycling Team raise some important points regarding the indicative layout and suitable design for collection services and provision for suitable refuse storage. Further comments provided in response to the June 2025 amendments include refuse storage requirements for all houses and communal development.
Electricity North West (ENW)	ENW have provided details of the affected assets on site and have shared standing advice and conditions for working close to underground and above ground electrical infrastructure.
National Grid	Notes that there are no National Grid Electricity Transmission assets affected in the area and that the overhead lines will be owned by the local Distribution Network Operator.
Cadent Gas	Holding Objection until Cadent engineers review the proposal. Advised to consult HSE in relation to high pressure pipelines.
Health & Safety Executive	HSE confirms the site does not lie within a distance of a major hazard or major hazard pipeline therefore, HSE does not need to be consulted nay developments on this site.
Secretary of Statement - National Planning Caseload Unit	Confirmed no comments on the Environmental Statement.
Office of Nuclear Regulation (ONR)	At the time of writing this report, no comments received.
Lancashire County Council Resilience Team (Emergency Planning)	<p>The LCC Resilience Team has consulted with the following agencies and organisations in relation to the proposed development:</p> <ul style="list-style-type: none"> • EDF Heysham Power Stations • Lancashire County Council Planning • Lancaster City Council Emergency Planning • Lancashire Fire and Rescue Service • Lancashire Constabulary • North West Ambulance Service

	<ul style="list-style-type: none"> UK Health Security Agency (UKHSA) <p>Following these consultations, the Resilience Team confirms that there are no objections to the development. All consulted agencies have confirmed they are able to accommodate the proposed changes within the existing Heysham Power Stations Off-site Emergency Plan.</p>
Lancaster Civic Vision	<p>Objection. Lancaster Civic vision strongly object to this application and urge Lancaster City Council to refuse it, noting the proposal is unsustainable and contrary to the adopted Lancaster Local Plan. It is unsurprising it is unsurprising that significant local opposition exists.</p> <p>The mains concerns are as follows:</p> <ul style="list-style-type: none"> The site is not allocated for development and contradicts the Local Plan's spatial strategy. The site is protected as part of a Key Urban Landscape and should be protected to provide a green buffer to the Bay Gateway to allow a network of habitat, landscape and biodiversity to mature The scheme undermines the Hest with Slyne Neighbourhood Plan and the strategic objectives of the Local Plan. The proposal also conflicts with updated NPPF guidance on housing supply, greenfield development, and agricultural land use. Slyne Road is already unsafe and flood-prone. Adding 200 homes will worsen congestion and safety risks for drivers and pedestrians. Schools and GP practices are at capacity. The development would overburden already stretched services, as noted by the NHS. The application fails to demonstrate how it would link to necessary infrastructure—transport, schools, healthcare, and open space—making it an isolated and poorly planned scheme. Development would increase flood risk, cause habitat loss, and threaten local wildlife and ecosystems. Building on such land poses a risk to the structural integrity of the dwellings and raises concerns about the long-term impact on the local environment, including soil erosion, contamination thus affecting biodiversity. Disruption to habitats would cause decline in local biodiversity Increased pollution from vehicle emission, soil and water pollution, noise and light pollution negatively impacting wildlife and directly threatening the health and well-being of our community. The scale and nature of the development would harm local character, tranquillity, and valued countryside walks, including a local memorial site. The proposal distracts from the focus on regenerating Morecambe, particularly around the Eden Project, and dilutes strategic growth objectives.
CPRE	<p>Objection. A summary of the main reasons for opposition are as follows:</p> <ul style="list-style-type: none"> The site is unallocated in the Local Plan and is in the Open Countryside and as protected by Key Urban Landscape. The development will cause significant harm to landscape, ecology and public rights of way. Brownfield land should be developed before green fields. Harm is identified to the valued local landscape and the KUL designation Lack of ecological information and concerns relating to the assessment and impact on protected species, important habitats and the effect on Morecambe Bay SPA and its interested features. The historical, cultural and biological value of the important hedgerows has been under-accounted for in the assessment and with significant losses proposed would be contrary to DM45. The site layout does not integrate existing biodiversity assets on the site and would lead to considerable losses. BNG undervalues existing site and over values future biodiversity value with the BNG below the mandated 10%. The metric should be updated.

	<ul style="list-style-type: none"> • The proposals lack consideration of the use of Powerhouse Lane for horses as well as cyclists and pedestrians. • Recommends use of renewable technology with least impact on the countryside, such as solar panels, be incorporated into the development. • Requests the application is refused. <p>In response to the further information, CPRE note that unless the amendments significantly address the objections originally submitted, CPRE maintain their position. Following the June 2025 amendments, CPRE continue to object noting they share the concerns and objections raised by GMEU and believe the benefits of the development (housing) would not outweigh the conflicts with the Local Plan and permission should be refused.</p>
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4.2 At the time of compiling this report, over **270** representations had been received. Of these responses, only 2 letters of support have been submitted to the Local Planning Authority. The number of representations received is a combined total from the initial comments in early 2024, amendments in late 2024 and recent consultation in June 2025 and includes representations from households/individuals who have previously commented on the initial application.

A summary of the main reasons of opposition are as follows:

- **Housing matters:** the site is not allocated for housing; all houses should be affordable; the proposal would lead to a greater development (closer to 500-600) in the future; there is no shortfall of housing in the area; supporting housing on unallocated sites undermines the Local Plan making process and results in piecemeal development supported by necessary infrastructure; there is more appropriate land for housing than the proposed site, such as brownfield sites.
- **Highway impacts:** unsuitable and unsafe access onto Hasty Brow; approximately 400 cars would be provided for 200 homes on roads not designed to accommodate this volume of traffic; exacerbate existing problems with rat-running via Russell Drive and Hasty Brow to the M6; Hasty Brow is narrow, has blind bends and is constrained by the railway bridge and canal bridge so unsuitable for construction traffic; poor pedestrian connectivity and lack of footways to the village increasing the risk of accidents especially for children walking to school; the road network has many blind bends and suffers speeding vehicles.
- **Flood risk / drainage:** the site is susceptible to flooding and will flood more often with climate change, the development of houses on flood plain with exacerbate flood risk elsewhere, Hasty Brow already floods and causes hazards on the road, infrastructure to drain to the sea is already inadequate, loss of open watercourses is harmful to ecology and flood management.
- **Landscape impacts:** loss of Key Urban Landscape; the community have already been impacted by the incursion of the Bay Gateway, further development would be unacceptable; urban expansion and loss of village character to the area; too close to the Barrow; loss of green belt land, three storey dwellings are not in keeping with the locality, inappropriate density of development.
- **Ecology matters:** loss of wildlife and habitats are irreplaceable, unacceptable impacts on protected species, loss of trees and hedgerows not only impacts species but would impact climate change, provision for swifts should be provided as part of the development; loss of valuable green infrastructure; the ecological surveys and assessment are poor and doesn't reflect the ecological interests on the site.
- **Residential amenity:** loss of privacy, security concerns, overlooking due to level changes, loss of tranquillity (quiet), disruption during construction phases, increase in noise and pollution to local residents, grossly adverse impact on the physical, emotional and mental wellbeing of local residents, increase in vermin, health risks living close to pylons and the Bay Gateway, inappropriate location for paths and play space behind existing houses.

- **Heritage:** Views of Torrisholme Barrow, known as a historic monument and is visited daily, would be ruined by the development; the development to the North was dismissed due to the impacts on the Barrow – the same issues apply with this application and the application should be refused; the canal bridge on Hasty Brow is listed and could be damaged by the development's traffic.
- **Infrastructure:** loss of limited area of open countryside in Morecambe for residents to enjoy, unacceptable impact on education and health places/provision to support increased population, the land supports power cables and pylons with a gas pipeline to the rear of Russel Drive; existing drains unable to cope with expansion and are already overwhelmed in flood conditions; development should not impact mitigation land associated with the Bay Gateway and existing footways should be protected; cumulative impacts arising from this development and others, such as North Lancaster.
- **Other matters:** concerns over the timing of the initial consultation (over Christmas and New Year), the level of consultation undertaken, and the time allowed to make public comments; loss of valuable agricultural land, impacts on existing ground stability and foundations, inaccuracies in the submission (labelling of the A638).

4.3 At the time of compiling this report, 2 representations in support have been received. A summary of the main reasons for support are as follows:

- Provision of new homes to support younger local people in need of housing and affordable housing.
- The Torrisholme/Bare area has not seen new housing to support population growth – this development will help young people get on the property ladder and is a huge positive for many people.
- One of the more sensible applications encountered recently.
- Bus services are good locally.
- The site is preferred to previous proposals which would ruin Torrisholme Barrow
- The dedication to respecting the natural environment makes it worthy of existing within the green belt.
- Whilst acknowledging concerns by others, notes being car-centric is a sign of the times.
- Given archaeological heritage interests, council may be in for some priceless findings too.

5.0 Analysis

5.1 The key considerations in the assessment of this application are:

- Environmental Impact Assessment (EIA)
- Principle of residential development
- Landscape and visual effects
- Cultural heritage
- Access, traffic impacts, sustainable travel and parking
- Flood risk and drainage
- Ecology
- Residential Amenity
- Housing Need
- Open Space
- Education and health
- Sustainable design and renewable energy
- Air Quality

5.2 Environmental Impact Assessment

5.2.1 The proposed development constitutes EIA development and has been submitted with an Environmental Statement (ES), along with a subsequent ES Addendum to address changes to the proposal arising from updated policy and revisions to the flood risk baseline.

- 5.2.2 The aim of Environmental Impact Assessment (EIA) is to protect the environment by ensuring that the local planning authority, when considering a planning application and determining whether to grant permission for a project, does so with a full understanding of the likely significant environmental effects. This includes taking into account the outcomes of public consultation with the public and consultation bodies and ensuring these considerations are integrated into the decision-making process.
- 5.2.3 The PPG (046 ID: 4-046-20170728) makes it clear that there are ‘*specific arrangements for considering and determining planning applications that have been subject to an Environmental Impact Assessment (EIA). These arrangements include consideration of the adequacy of the information provided, consultation, reaching a reasoned conclusion on the significant environmental effects of the proposed development, publicity, and informing the consultation bodies and public of both the decision and the main reasons for it. The local planning authority must take into account the information in the Environmental Statement, the responses to consultation and any other relevant information when determining a planning application*’.
- 5.2.4 The EIA Regulations stipulate that an ES should identify, describe, and assess the likely *significant* effects of a development on the environment during the construction and operational phases and having regard to cumulative effects. Assessing EIA development is a systematic process which requires a robust methodology, including an accurate assessment and description of the baseline environmental conditions (now and in the future).
- 5.2.5 Assessing the significance of each environmental effect is generally determined by understanding the sensitivity or value of the environment and the magnitude of change to the environment as a result of development. This can vary based on relevant published guidance for individual subject areas.
- 5.2.6 The submitted ES recognises that most environmental discipline’s effects are classified as negligible, adverse, or beneficial, with the magnitude of effect, defined as minor, moderate, or major. Environmental effects are then evaluated against best practice standards, guidance legislation and informed by professional judgement, to establish whether the effects are significant or not. Consideration of mitigation and monitoring forms an important aspect of assessing whether effects can be reduced to avoid significant environmental effects overall.
- 5.2.7 The approach outlined above, along with the methodology adopted in the Environmental Statement (ES)—including the consideration of reasonable alternatives and cumulative (in-combination) impacts—has been applied consistently throughout the document and aligns with established best practice guidelines. Each chapter of the ES includes a conclusion regarding the significance of effects during both the construction phase and the first year of operation (Year 1). Residual effects are also assessed, taking into account the effectiveness of mitigation measures at Year 15 post-development.
- 5.3 **Principle of Residential Development** NPPF Sections 2 (Achieving Sustainable Development), Section 5 (Delivering a Sufficient Supply of Homes), Section 15 (Conserving and enhancing the natural environment), Section 17 (Facilitating the sustainable use of minerals) ; Strategic Policies and Land Allocations (SPLA) DPD policies SP1 (Presumption in Favour of Sustainable Development), SP2 (Lancaster District Settlement Hierarchy), SP3 (Development Strategy for Lancaster District), EN3 (The Open Countryside) and EN5 (Local Landscape Designations); Development Management (DM) DPD policies: DM1 (New Residential Development and Meeting Housing Needs), DM4 (Residential Development Outside Mian Urban Areas) and DM46 (Development and Landscape Impact); Joint Lancashire Minerals and Waste Local Plan Site Allocations and Development Management Policy: M2 (Safeguarding Minerals) and Guidance Note (December 2014).
- 5.3.1 The application site lies adjacent to the existing built-up area of Morecambe and is designated as Open Countryside and Key Urban Landscape (KUL) in the adopted Local Plan. While the Policies Map shows the site within the urban boundary of Morecambe, the Local Plan does not include a specific policy relating to urban areas. As such, for the purposes of assessing this application, the proposal is considered against Policy EN3 of the Strategic Policies and Land Allocations (SPLA) Development Plan Document (DPD), which relates to development within the open countryside, along with policy EN5 relating to its landscape designation.

- 5.3.2 Historically, the site was located within the North Lancashire Green Belt. However, it was removed from the Green Belt following the Green Belt Review and the adoption of the Local Plan in 2020. It was subsequently re-designated as KUL, along with adjacent land to the north and west, including Torrisholme Barrow. The current Green Belt boundary now lies to the east of the railway line.
- 5.3.3 Policy EN3 states that development proposals within the open countryside must have regard to all relevant policies within the Local Plan, particularly those in the Development Management (DM) DPD that deal with rural development. Policy DM4 supports residential development outside main urban areas only where it reflects sustainable patterns of growth and aligns with the settlement hierarchy set out in Policy SP2 of the SPLA DPD.
- 5.3.4 Policy SP3 of the SPLA DPD outlines the district's overarching development strategy, promoting an urban-focused approach, with growth directed toward the main urban areas of Lancaster, Morecambe, Heysham, and Carnforth. It also supports development in other sustainable settlements, as defined in the hierarchy. Although the application site is not located within a defined sustainable settlement, it is adjacent to one of the district's main urban areas—Morecambe—and benefits from proximity to its associated services and facilities.
- 5.3.5 The site is located in the Open Countryside and not strictly defined within a sustainable settlement. However, it is clearly adjacent to one of the main urban areas and the wider facilities and services that it provides within the district. Notwithstanding the Open Countryside and KUL designations, the site is considered to be sustainably located to support new housing growth.
- 5.3.6 Key Urban Landscape (KUL) is a local landscape designation identified in the Strategic Policies and Land Allocations (SPLA) DPD. Policy EN5 seeks to conserve such areas by safeguarding their open character and natural features. The policy states that development will only be permitted where it preserves the open nature of the area and maintains the character and appearance of its surroundings.
- 5.3.7 This approach is reinforced by Policy DM46 of the Development Management (DM) DPD, which requires particular regard to be given to the historic townscape and built form of urban areas. The supporting text to Policy DM46 explains that KUL's are areas within the main urban settlements that are integral to the district's built form. They often provide an important setting for key features or heritage assets and contribute significantly to the definition and experience of the wider urban townscape.
- 5.3.8 The proposal is for *up to* 130 dwellings, which has reduced considerably from the original proposal of *up to* 200 dwellings. Whilst there has been a reduction in the number of units, the proposed residential development would fail to preserve the open nature of the area as it would result in a significant amount of new built development and associated infrastructure on a large proportion of the site which is currently open undeveloped agricultural land.
- 5.3.9 The development would include the alteration to land levels across parts of the site (although significantly less than originally proposed) resulting in the loss of some trees and hedgerows, although the full extent of tree/hedgerow loss cannot be determined until the reserved matters stage. The impact of the development on the surrounding area, including the adjacent Scheduled Monument and its setting and the effects on landscape character and visual amenity are considered in later sections of this report. However, it is clear that the development of the site for housing would conflict with its allocation as KUL (policy EN5 and DM46) and is considered a departure from the Local Plan.
- 5.3.10 Paragraph 61 of the National Planning Policy Framework (NPPF) sets out that to support the government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. The Council's most recent Housing Land Supply Statement (January 2025) identifies a housing land supply of 2 years, which is a significant shortfall against the required 5-year supply set out in the NPPF. Paragraph 11 of the NPPF also requires that, where a local planning authority cannot demonstrate a 5-year supply of deliverable housing sites, permission should be granted unless the application of policies in the NPPF that protect areas or assets of importance (such as areas at risk of flooding, designated heritage assets, statutory habitat sites) provide a strong reason for refusing permission; or any

adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

- 5.3.11 Policy EN5 is considered the most important policy for assessing this application. However, given the current housing land supply position, the policy is deemed to be out of date, thereby triggering the application of the tilted balance in favour of the delivery of residential development, in accordance with paragraph 11(d) of the National Planning Policy Framework (NPPF).
- 5.3.12 Notwithstanding its out-of-date status, weight can still be attributed to Policy EN5. This is supported by two recent appeal decisions in the district — APP/A2335/W/23/3335117 (Land north of Ashford House) and APP/A2335/W/23/3326750 (Land east of Fulwood Drive) — where Inspectors afforded full weight to Policy EN5. In both cases, the supporting evidence base for the allocation was considered robust and up-to-date, and the policy was found to be broadly consistent with the objectives of the NPPF.
- 5.3.13 The Slyne-with-Hest Neighbourhood Plan was formally made following a Full Council meeting on 27 September 2023 and now forms part of the Development Plan. The Neighbourhood Plan does not allocate land for housing within the plan area, and on the whole its policies have limited relevance to the determination of this outline application. This is primarily because of the outline nature of the proposal. The most relevant policies relate to design matters (Policy BE1), which is primarily a consideration at the reserved matters stage and policy NE2 relating to protected views within the plan area. The relevant policies will be addressed where relevant in the following sections of this report.
- 5.3.14 Loss of Agricultural Land
The loss of the agricultural land is a material planning consideration and a matter of principle. Policy DM44 states development proposals '*should avoid the use of the best and most versatile agricultural land and should, as far as possible, use the lowest grade of land suitable*'. The NPPF equally reinforces the need to protect the highest quality agricultural land. Paragraphs 187, 188 and within footnote 62 states '*planning policy and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils*'. The best and most versatile (BMV) land is defined as Grades 1, 2 and 3a. The Post 1988 Agricultural Land Classification Map identifies the application site and the surrounding field network to comprise of Grades 3a and 3b agricultural land. Grade 3b is not considered best and most versatile land (BMV).
- 5.3.15 The applicant's Agricultural Land Classification Assessment covers a larger site (20 hectares), which appears to relate to the land considered in the original EIA Screening Opinion request. The effect of the development on BMV land is outside the scope of the submitted ES.
- 5.3.16 Across this larger assessment area, the applicant's assessment determines around 14.5 hectares of Grade 3a land would be lost to development. However, most of the site affected by the development is classified as 3b. Most of the 3b land relates to the land identified for open space to the south/southwest of the proposed developable areas. The developable areas comprise larger areas of 3a agricultural land. North of the application site (up to Slyne Road) is also considered BMV land.
- 5.3.17 Policy DM44 of the DM DPD states that development proposals **should** avoid the use of best and most versatile agricultural land and should, as far as possible, use the lowest grade of land suitable. In this regard there is conflict with policy DM44. If the open space and developable areas were flipped, arguably this policy requirement could be met. However, for reasons set out later in this report, the land to the south is not considered suitable for development due to flood risks and ecological reasons.
- 5.3.18 Where development would result in the loss of 20 hectares of grades 1, 2 or 3a land, Natural England would be a statutory consultee. In the context of EIA development, the loss of 20ha is generally considered to be of minor significance. The Planning Statement indicates the proposal would result in around 5ha of BMV land being lost, therefore well below this threshold. It is agreed that the effects

arising from the loss of a small area of 3a BMV agricultural land would not be significant and would not substantiate a reason for refusal, despite the conflict with local policy DM44.

5.3.19 Mineral safeguarding

The site is also protected for its potential mineral resource. Policy M2 of the Minerals and Waste Plan seeks to prevent the sterilisation of mineral resources by non-minerals development. The Mineral Safeguarding designation extensively extends across this part of the district, particularly to the north and east of the site.

5.3.20 The site is safeguarded for sand and gravel. Policy M2 sets out that planning permission will not be supported for any form of development that is incompatible with working the minerals, unless the applicant can demonstrate that:

- The mineral concerned is no longer of any value or has been fully extracted.
- The full extent of the mineral can be extracted satisfactorily prior to the incompatible development taking place.
- The incompatible development is of a temporary nature and can be completed and the site returned to its original condition prior to the minerals being worked.
- There is an overarching need for the incompatible development that outweighs the need to avoid the sterilisation of the mineral resource
- That prior extraction of minerals is not feasible due to the depth of the deposit.
- Extraction would lead to land stability problems.

5.3.21 A Mineral Safeguarding Assessment has been submitted with the application. This falls outside the scope of the ES. The submitted report sets out that mineral resources including glaciofluvial sands and gravels deposits are considered to underlie parts of the site. It claims the development of 12 hectares of land in the wider region would not sterilise the mineral resource and considers the need for housing a matter that outweighs the need to extract minerals. The assessment also goes on to assess likely environmental impacts arising from prior extraction.

5.3.22 The site lies immediately adjacent to a relatively large residential area, with significant transport infrastructure to the east (Bay Gateway) and north (West Coast Mainline). It is low lying land supporting existing water courses which directly link to the River Lune and the nature conservation sites associated with Morecambe Bay, and is located to the east of a Scheduled Ancient Monument. It is a highly sensitive site whereby prior extraction (quarrying of minerals) would lead to significant environmental effects associated with noise, vibration, dust, potential flooding and land stability issues - impacts that would be far greater than the development of houses due to the likely depths required for the extraction of minerals on the site.

5.3.23 Furthermore, the current policy of Lancashire County Council states that new sand and gravel extraction will not be supported. This effectively precludes the extraction of glaciofluvial sands and gravels at the site, especially given the extensive quantities of such deposits already present within the Lancashire area.

5.3.24 It is therefore considered that the mineral safeguarding allocation on this site does not provide a constraint to the development.

5.3.27 Conclusion

There are several key issues discussed above to help establish whether the principle of residential development on this site is acceptable. In summary, whilst located in the open countryside, the site is located in a sustainable position on the edge of an existing urban area where housing growth in principle could be supported; whilst parts of the site are considered to be BMV agricultural land the loss would not be significant and would not constrain development, and the prospect of mineral extraction is limited. However, the development of the site for housing would conflict with the Local Plan landscape designation, as it would fail to preserve the open nature and character of the KUL.

5.4 **Landscape and Visual Effects** NPPF Chapter 8 (Promoting Healthy and Safe Communities including Open Space and Recreation), Chapter 12 (Achieving Well-Designed Places), Chapter 15 (Conserving and Enhancing the Natural Environment); Strategic Policies and Land Allocations (SPLA) DPD: SP8 (Protecting the Natural Environment), EN3 (The Open Countryside) and EN5 (Local Landscape Designations); Development Management (DM) DPD policies: DM29 (Key Design

- 5.4.1 Paragraph 187 of the *National Planning Policy Framework (NPPF)* states that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside. Paragraph 175 emphasises that Local Plans should clearly distinguish between the hierarchy of international, national, and locally designated sites and allocate land of least environmental or amenity value for development.
- 5.4.2 In preparing the Local Plan, Lancaster City Council recognised that the district contains a range of important landscapes that are valued features of the natural environment and worthy of protection. The Plan appropriately distinguishes between landscapes of national significance, such as National Landscapes (formerly AONBs), and those of local significance. It identifies several locally valued landscapes that make a positive and important contribution to the natural and built environment and to the overall uniqueness of the district.
- 5.4.3 Policy SP8 serves as an overarching policy aimed at protecting these important landscapes from harmful and inappropriate development. The Local Plan defines two types of local landscape designations: Key Urban Landscape (KUL) and Urban Setting Landscape (USL), both of which are protected and allocated under Policy EN5 'Local Landscape Designations' of the Strategic Policies and Land Allocations document. These designations were informed by externally commissioned professional evidence that formed part of the Local Plan's evidence base. They play a key role in shaping the character of the district, with many of the identified landscapes providing the setting for important areas and features that collectively contribute to the identity of Lancaster district.
- 5.4.4 Policy EN5 is explicit in its intent: landscapes identified under this policy must be conserved and protected because of the historical and ongoing role they play in defining the district's character. It states that development proposals within these areas will only be permitted where they preserve the open nature of the area and respect the character and appearance of their surroundings. The Council places strong emphasis on maintaining the openness of both KUL and USL and is committed to protecting them from inappropriate development that would compromise their character.
- 5.4.5 Additional protection is provided through Policy DM46 'Development and Landscape Impact' of the adopted Development Management DPD. This policy reinforces the requirement to conserve the contribution that KULs and USLs make to the character and setting of the district's urban areas and to safeguard important natural features. It places particular emphasis on the historic townscape and built form. It also states that only development which preserves the open nature of these areas and respects the character and appearance of their surroundings will be supported. Furthermore, Policy DM29 requires all development to contribute positively to the identity and character of the area, thereby promoting high-quality and context-sensitive design across the district. The Neighbourhood Plan also seeks to secure high quality design and to protect and enhance several key views within the Plan area.
- 5.4.6 The site is located to the east of Russell Drive, positioned between existing residential development, Powder House Lane and the embankment of the Bay Gateway. Open countryside lies to the north, northeast and northwest, including Torrisholme Barrow, providing a rural backdrop to the edge of the urban area. Torrisholme Road is situated to the south of the site. This provides a key transport route between Lancaster and Morecambe within the built-up area. The site itself consists of a mixture of grassland and arable fields, interspersed with mature trees and hedgerows that contribute to the site's semi-rural character. Overhead electricity transmission lines and a pylon are located within the site and are distraction features in the context of the rural backdrop.
- 5.4.7 Topographically, the site is relatively low-lying, generally sitting below the level of the adjacent housing to the west. The land gradually falls towards the south, influencing natural drainage patterns. To the northwest, beyond Slyne Road, the landscape rises significantly to form Torrisholme Barrow — a prominent and locally distinctive landform.
- 5.4.8 The site lies adjacent to the urban edge and falls within the *Low Coastal Drumlins* Landscape Character Type (LCT), sub-type *Carnforth–Galgate–Cockerham (12a)*, as defined in the Lancashire County Council's Landscape Strategy for Lancashire (December 2000). This landscape type is

characterised by low lying hills—typically around 40 metres in height—with broad, rounded tops, particularly prevalent toward the northwest coast of the study area. Compared to the more densely packed drumlin fields, this sub-type features a gentler, lower-lying topography with more isolated drumlins. The alignment of the drumlins imparts a distinctive grain to the landform for this LCT.

- 5.4.9 The LCT is further defined by a strong pastoral pattern, where mature, native hedgerows follow the undulating terrain. Tree and shrub cover is generally sparse, though small copses are occasionally found on the drumlin tops and flanks. Scattered large farmsteads, connected by a network of narrow, hedged lanes and tracks, are typical features of the rural character. However, this particular LCT (12a) accommodates a high level of built development, including the large settlements of Lancaster and Morecambe, as well as major transport infrastructure. As such, the landscape presents a mix of rural and urban influences, with traditional agricultural features sitting alongside modern housing estates and industrial areas.
- 5.4.10 The site does not impact any statutory landscapes (directly or indirectly) owing to the distance from the closest National Landscapes and the intervening development and surrounding countryside.
- 5.4.11 The site falls within an area identified as one of ten new local landscape designations in the *Key Urban Landscapes Review* (May 2018), prepared by landscape consultants Arcadis (at the time of the adoption of the 2020 Local Plan). This particular designation—AS-03: Torrisholme Barrow—is defined by clear physical boundaries: the railway line to the east, existing residential development to the west, and the Bay Gateway to the south. The designated area includes land both north and south of Slyne Road/Hasty Brow Road, and notably incorporates Torrisholme Barrow, a prominent local landscape feature.
- 5.4.12 The Arcadis report concluded that this area holds strong cultural heritage, a distinctive landform, and mature, well-managed landscape features. It is described as a landscape of significant quality and distinctiveness that contributes meaningfully to the setting of surrounding urban areas and the Barrow itself. Among the newly assessed sites, AS-03 received the highest overall score and was subsequently recommended for designation as a Key Urban Landscape.
- 5.4.13 Given its designation and the qualities identified in the Arcadis assessment, the site plays a crucial role in maintaining the openness and character of the urban fringe landscape, reinforcing the strategic purposes of policy EN5 relating to the protection of the districts local landscape designations. Proposed residential development across a substantial portion of the land would clearly conflict with the aims of Policies EN5 and DM46, which seek to preserve the open, undeveloped character of such areas.
- 5.4.14 The effects of the development on landscape character and visual effects form an important part of the ES. This has been updated within the ES addendum to reflect the amendments to the development. This includes a Landscape and Visual Impact assessment of the development which has been prepared in accordance with relevant best practice guidance.
- 5.4.15 Officers' own assessment of the site, having visited the site and its surroundings, consider the site to be influenced by the existing urban edge and the significant infrastructure which lies immediately adjacent to the site and through it (in the case of the pylon and overhead lines). This particularly relates to the land behind Russell Drive. It is acknowledged there are no public rights of way through the site, though footpaths route along the base of the Bay Gateway embankment along the southeastern boundary of the site. This enables views across the site towards the Barrow. The northern parts of the site begin to have a greater rural feel and character, whereby the site is considered to have a closer visual relationship to the wider KUL and Torrisholme Barrow, though the site is clearly separated (by Slyne Road) from the field enclosures which extend up towards the crest of Torrisholme Barrow. Traffic noise from the Gateway and the West Coast Mainline is audible, albeit not significant, and therefore does reduce the overall tranquillity of the site and its immediate surroundings. In light of this assessment, the conclusions within the ES for landscape quality (medium to low), value (medium) and susceptibility to change (medium to low) and landscape sensitivity (medium to low) are not contested.
- 5.4.16 The applicant's assessment considers the potential landscape and visual effects arising from the development during construction and its operational stages. In terms of landscape effects, the assessment concludes the potential effect on the landscape character of the site and immediate

area would result in moderate adverse effects, which is considered significant. This is a consequence of a permanent change from agricultural land with its replacement of up to 130 dwellings with associated infrastructure. The applicant contends that through embedded design measures, which includes the retention, bolstering and enhancement of existing landscape features, together with the provision of extensive areas of open space for public use, the residual effects would reduce the overall effects to moderate-slight adverse (and not significant). Officers are satisfied this provides a reliable and robust assessment of the landscape impacts on the site itself. However, to ensure the effects are less than moderate adverse it is imperative the identified mitigation (retention, bolstering and enhancement of high quality landscaping, provision of extensive areas of open space and new recreational routes through the site) is appropriately secured. The reserved matters will need to be prepared in accordance with the approved Parameters Plan and guided by the broad principles outlined in the Green and Blue Infrastructure Strategy and the Design and Access Statement, both of which promote a strong landscape-led approach to the design of the development. To minimise adverse effects during construction, adherence to a suitable CEMP will be required.

- 5.4.17 In relation to the landscape effects on the wider KUL, the level of effect is also considered to result in moderate adverse effects (therefore significant) both during construction and once operational. The residual effects, taking into account the identified mitigation, are anticipated to reduce this to slight adverse. The Parameters Plan and Green and Blue Infrastructure Strategy seek to provide landscape buffers around the development to contain the new development as new planting matures. This will reduce the level of effect over time, but it does not remove the fact the development will reduce the extent and integrity of the KUL and its primary purpose to protect the setting of Torrisholme Barrow.
- 5.4.18 The effect of the development on the LCA/LCT (Carnforth-Galgate-Cockerham/Low Coastal drumlin) is considered to be slight to negligible adverse and not significant. Whilst the development will result in the loss of open arable fields and the loss of some existing landscape features, with mitigation, the introduction of built development is not unfamiliar in these LCA/LCTs and would only affect a small part of a wider landscape character area/type.
- 5.4.19 Turning to the visual effects of the development, the assessment has followed established guidance and standard methodology, considering the likely impacts on a range of visual receptors. As is typical, the greatest level of visual effect is experienced by receptors located closest to the site. In this case, both during construction and once the development becomes operational, a range of substantial to moderate adverse visual effects are predicted for key receptors. These include users of Slyne Road, the open space associated with Torrisholme Barrow (due to its elevated position and its role in the site's wider setting), users of Powder House Lane, the informal track along the southern and south-western boundaries of the site, and residents of Russell Drive, Hexham Road, and Slyne Road.
- 5.4.20 With the inclusion of proposed mitigation—namely, embedded design at the reserved matters stage including limitation on the scale of development and the delivery of a comprehensive Green and Blue Infrastructure Strategy—the residual visual effects are expected to reduce to moderate slight adverse (or less) for most receptors, except for the residential receptors of Russel Drive, Hexham Road and Syne Road where moderate adverse effects will still be experienced.
- 5.4.21 The severity of these effects is principally due to the direct intervisibility between the site and the receptors mentioned. The degree of visual harm is heightened for those receptors considered to be of high sensitivity, particularly residential properties and recreational users experiencing views from Torrisholme Barrow and the nearby informal tracks and roads. From neighbouring and nearby residential properties, there will be clear views of the development. However, following the amendments to the scheme, most properties will now overlook open space, retained and bolstered landscaping, therefore filtering views of the development to the northern parts of the site. It is accepted this is not the case of the properties closer to the site access.
- 5.4.22 Overall, the proposed development is assessed to result in moderate to moderate/slight adverse effects on both the landscape character and the visual amenity of the area. As such, it would conflict with the landscape-related policies of the Local Plan. However, these impacts are expected to be localised and, on balance, are not considered significant in the context of the EIA regulations.

- 5.5 **Cultural Heritage** NPPF Chapter 16 (Conserving and Enhancing the Historic Environment); Strategic Policies and Land Allocations (SPLA) DPD policies SP7 (Maintaining Lancaster District's Unique Heritage); Development Management (DM) DPD policies DM39 (The Setting of Designated Heritage Assets), DM41 (Development Affecting Non-Designated Heritage Assets or their Settings), DM42 (Archaeology)
- 5.5.1 Cultural Heritage forms part of the ES and includes a thorough heritage impact assessment (HIA), supported by further archaeological investigation and evaluation post submission of the application.
- 5.5.2 The proposed site is located approximately 220m from the Scheduled Monument known as Torrisholme Barrow, which is a Bronze Age bowl barrow. A bowl barrow is an inverted pudding bowl-shaped mound and Scheduled Monuments are nationally important archaeological sites. The monument, a mound some 32m in diameter and 2m high, occupies the summit of a small hill and enjoys extensive views in all directions. The proposal has the potential to impact on archaeology that may be present within the site and also the setting of this designated heritage asset. The ES and (HIM) also considers other listed buildings that may be impacted by the proposal. This includes Lancaster Canal Folly Bridge, Lancaster Canal Williamslands Bridge and Lancaster Canal Belmont Bridge (all grade II listed) and the Ashton Memorial (Grade I).
- 5.5.3 The proposal will result in urban development extending into the open pastoral fields wrapping around the southern extent of Torrisholme Barrow. This will inevitably reduce the openness of the wider landscape and have an adverse effect on the setting of the monument. The proposed urban expansion is not considered to impact the setting of the other identified listed buildings.
- 5.5.4 In relation to archaeology, the site had been identified as an area of significant archaeological potential, due to its location adjacent to the Scheduled Monument of Torrisholme Barrow and the discovery of other prehistoric and Romano-British remains in the immediate area. Accordingly, it has now been subject to an archaeological geophysical survey and a scheme of archaeological trial trenching following comments from Lancashire County Council's Historic Environment Team.
- 5.5.5 The outcomes of the additional archaeological works and evaluation confirm there is limited archaeological evidence on site and further archaeological works are not required. This has been accepted by the County Council's Historic Environment Team who no longer object to the proposal. In this regard there is no conflict with policy DM42 and the NPPF.
- 5.5.6 In relation to the setting of the Scheduled Monument, policy DM39 and DM42 are relevant. DM39 addresses the setting of heritage assets, recognising that setting can contribute significantly to an asset's overall significance. The policy states that proposals which preserve elements of a setting that make a positive contribution to, or better reveal, the significance of a heritage asset will be supported.
- 5.5.7 Policy DM42 further requires that proposals affecting Scheduled Monuments must conserve or enhance those elements which contribute to their significance. Harm to such elements will only be permitted where it is clearly justified and demonstrably outweighed by public benefits.
- 5.5.8 National policy in the NPPF reinforces this approach. Paragraph 212 makes clear that when considering the impact of development on the significance of a designated heritage asset, great weight should be given to its conservation. Paragraph 213 adds that any harm to a heritage asset's significance—including harm arising from development within its setting—must be clearly and convincingly justified. Where a proposal results in less than substantial harm, Paragraph 215 requires that this harm be weighed against the public benefits of the development.
- 5.5.9 The HIA and ES have been updated to reflect the changes to the proposal, reducing the number of dwellings from 200 to 130. The assessment concludes that the loss of open fields to accommodate residential development, associated open space, and infrastructure would result

in a long-term, permanent change to the rural setting of Torrisholme Barrow—particularly in relation to views to and from the monument itself.

- 5.5.10 However, with mitigation measures such as the retention of mature trees across the site and the inclusion of a landscape buffer along the northern and north-eastern boundaries, the ES concludes that the effects on the setting of Torrisholme Barrow fall within the negligible range. This represents a reduction from the previously assessed slight adverse effects associated with the earlier 200-dwelling scheme. During construction, there will be slight to negligible adverse effects. These are capable of mitigation through an effective CEMP to manage noise, dust and traffic impacts. Such effects are short-lived and temporary and therefore not significant.
- 5.5.11 Nonetheless, given the location of the developable areas as shown on the Parameters Plan, this reduction—from slight adverse to negligible—is not considered to be sufficiently justified. Whilst it is acknowledged that the amendments secure a landscape buffer, officers maintain the view that the level of effect remains slight adverse as the encroachment of built development ultimately remains the same (except a narrow buffer along the northern boundary). When viewed from the Barrow the urban edge will markedly encroach into the existing undeveloped landscape and will, due to the position of the open space, have a slightly detached relationship to the existing urban area.
- 5.5.12 Whether assessed as slight adverse or negligible, it is agreed that the proposal results in less than substantial harm to the setting of the designated heritage asset which is not considered significant in EIA terms.
- 5.5.13 In line with national policy, this harm must be balanced against the public benefits of the proposal. Lancaster City Council currently faces a significant shortfall in the supply of deliverable housing sites. Paragraph 61 of the NPPF highlights the government’s objective to significantly boost the supply of homes, making clear that it is essential for a sufficient amount and variety of land to come forward where it is needed.
- 5.5.14 This site is highly sustainable, located adjacent to the existing urban area of Morecambe and would deliver up to 130 new homes, including policy-compliant affordable housing. In addition, the proposal will provide extensive areas of new public open space and will provide meaningful improvements to infrastructure to support active travel. The proposal represents a notable public benefit, particularly in the current housing context. When considered in the round, the public benefits arising from the development are judged to outweigh the less than substantial harm identified to the setting and significance of the Scheduled Monument. The proposal would not therefore conflict with policy and the impacts on the setting of Torrisholme Barrow Scheduled Monument would not provide a strong reason for refusing permission. Therefore, the tilted balance remains engaged.
- 5.5.15 The conclusions above are consistent with the officer recommendation in considering the proposals at Fulwood Drive. However, it is acknowledged that the Inspector, in dismissing that appeal, considered the harm to the setting of the Scheduled Monument a clear reason for refusing permission and noted the benefits did not outweigh the harm.
- 5.5.16 The dismissed development off Fulwood Drive and the proposed development are similar in terms of the quantum of development being sought and both fall within the Key Urban Landscape (KUL), which positively contributes to the setting of the Scheduled Monument. Nevertheless, there are distinctions between the two sites, namely that the proposed site is physically separated from the drumlin feature which accommodates the Scheduled Monument, whereas the scheme off Fulwood Drive clearly encroached upwards and around the base of the drumlin itself.
- 5.5.17 Furthermore, and material in this recommendation, is the fact that Historic England are a statutory consultee to this application. They have raised no objection to the development on heritage grounds and have commented as follows: *‘Historic England considers that, while there would be some limited additional impact on the already compromised setting of the Torrisholme*

Round Barrow, this would not be sufficient to justify the refusal of planning permission on heritage grounds, particularly if the mitigation measures suggested were implemented’.

5.5.18 Historic England have been made aware of the appeal decision at Fulwood Drive and maintain their position having visited the site to make their assessment. In particular, they are of the opinion that despite the extension of development to the north, west and south of the Barrow’s location, it remains possible to appreciate its position overlooking the surrounding landscape (due to its elevated position), and to appreciate why its builders would have chosen to construct it there.

5.5.19 Consequently, it does not follow that the outcome of the Fulwood Drive appeal should automatically lead to a refusal of this permission on heritage grounds. Whilst it is a matter of judgement (as to the level of harm and the heritage planning balance), given Historic England’s position, it is considered that the development (with mitigation) complies with both local and national planning policy in relation to the conservation of designated heritage assets.

5.6 **Access, traffic impact, sustainable travel and parking** NPPF section: 9 (Promoting Sustainable Transport); Strategic Policies and Land Allocations (SPLA) DPD policy: SP10 (Improving Transport Connectivity); Development Management (DM) DPD policies DM29 (Key Design Principles), DM57 (Health and Well-being), DM58 (Infrastructure Delivery and Funding), DM60 (Enhancing Accessibility and Transport Linkages), DM61 (Walking and Cycling), DM62 (Vehicle Parking Provision), DM63 (Transport Efficiency and Travel Plans) and DM64 (Lancaster District Highways and Transport Masterplan); Slyne-with-Hest Neighbourhood Plan Project (not policy) CC2 Road Safety.

5.6.1 The district’s development strategy (policies SP2 and SP3) aims to manage growth in the most sustainable way possible by directing growth to the main urban areas and to the identified rural sustainable settlements. This provides the greatest opportunities for people to travel by alternative sustainable transport modes rather than by private car. The proposed site, despite straddling the Slyne-with-Hest parish, is on the edge of one of the larger urban areas of the district and is considered to be sustainable in this regard.

5.6.2 The NPPF (paragraph 115) requires applications for development to ensure:

- sustainable transport modes are prioritised taking account of the vision of the site, the type of development and its location;
- safe and suitable access can be achieved for all users;
- the design of streets, parking areas, other transport elements reflects standards in national guidance, including the National Design Guide and National Model Design Code;
- any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.

This criterion is reflected and expanded upon within policies DM60-DM63 of the DM DPD. Policy DM29 also requires development to be located where the environment and infrastructure can accommodate the impacts of expansion and new development is well connected to existing settlements and services.

5.6.3 Transport and Access is a matter scoped into the ES and ES Addendum.

5.6.4 Access Strategy

The applicant is seeking approval of access details in full as part of the outline planning application. The development shall be served by a new vehicular access and egress off Slyne Road. An emergency access is proposed off Powder House Lane which will also provide an active travel connection.

5.6.5 The surrounding highway network comprises Slyne Road, Powder House Lane and Lancaster Road. The Bay Gateway runs along the eastern boundary and is raised above the site. From the application site, Morecambe Road provides the closest connection to the Bay Gateway. Alternative connections could be made via Slyne Road (Hasty Brow) to the A6 (via Hest Bank Lane).

- 5.6.6 Slyne Road, In the vicinity of the application site, is rural in character, comprising a single carriageway two-way road with no footways and no street lighting. It is subject to a 30mph speed limit, which reverts to the national speed limit north of the proposed site access. South of the proposed access, as Slyne Road enters the existing built-up area, the speed limit reduces to 20mph. Footway provision begins on the southern side of the carriageway at this point, although it is relatively poor. Approximately 60 metres south-west of the site, Slyne Road connects with Russell Drive. Russell Drive links to Lancaster Road to the south and is subject to a 20mph speed limit. It is lit, includes footways on both sides of the carriageway, and has unrestricted on-street parking.
- 5.6.7 Lancaster Road is one of the main routes between Lancaster and Morecambe. It is lit, has footways on both sides, and is subject to a 30mph speed limit up to just beyond the junction with Russell Drive. Regular bus services operate along this route. Powder House Lane, which connects Barley Cop Lane to Slyne Road beneath the Bay Gateway, is a single-track rural lane. It is bound by mature hedgerows, unlit, has no footways, and is subject to a 60mph speed limit. Due to its low usage and lack of natural surveillance, it is frequently subject to fly-tipping.
- 5.6.8 The proposed access comprises a new junction into the site off Slyne Road with a ghost island right turn lane. The access comprises a 7.3 metre wider carriageway and an 8 metre kerb radius with visibility splays of 43 metres in both directions. The access arrangements would include an extension of the existing 20mph limit on Slyne Road to incorporate the new development.
- 5.6.9 The scheme also includes the re-alignment of Slyne Road in the vicinity of the proposed access, extending westwards towards the junction with Hexham Road. This supports the provision of the ghost island right turn lane and enables new and improved footways to be provided towards Torrisholme village.
- 5.6.10 An emergency access is proposed from Powder House Lane, located at the south-east corner of the development site. The precise design and specification of this access will be secured by planning condition but will include physical deterrents—such as bollards—to prevent unauthorised or improper use by general traffic.
- 5.6.11 The scheme also incorporates new active travel connections, including pedestrian and cycle access via the main vehicular entrance onto Slyne Road, and via the emergency access onto Powder House Lane. Additionally, the development will provide links to the existing east-west footway located immediately to the south of the site, adjacent to the base of the Bay Gateway embankment. This route connects Lancaster Road to Powder House Lane, further enhancing connectivity. The final details of these access arrangements will be subject to approval through planning condition.
- 5.6.12 Despite the strong opposition to the access arrangements by members of the public, the proposed access strategy is considered acceptable to the Local Highway Authority and would not conflict with requirements of planning policy in respect of providing a safe and suitable access for all users.

5.6.13 Sustainability

The Chartered Institution for Highways and Transportation (CIHT) sets out suggested walking distances between sites and key services based on desirable, acceptable and preferred maximum distances. This are set out below:

	Town Centres (m)	Commuting/School/ Sightseeing (m)	Elsewhere/Local Services (m)
Desirable	200	500	400
Acceptable	400	1,000	800
Preferred Maximum	800	2,000	1,200

Source: Applicant's Transport Assessment.

- 5.6.14 The proposed site is located on the edge of the existing built-up area of Torrisholme. Torrisholme village (as it is locally known) serves as the nearest local centre. The closest primary school—Torrisholme Community Primary School—is situated off Low Road.

- 5.6.15 The applicant's Transport Assessment includes a walking catchment plan, which demonstrates that the local centre lies largely within 1,000 metres of the site's centre, while the nearest primary school is within approximately 2,000 metres. It is also acknowledged that Lancaster and Morecambe College, Aldi on Lancaster Road, and parts of the White Lund employment area fall within preferred maximum walking distances.
- 5.6.16 Local pedestrian infrastructure is considered adequate, with continuous, lit footways provided along residential streets and Lancaster Road, with the exception of footway provision on Slyne Road up towards Hexham Road. The area's topography does not present any significant constraints, and walking between the site and nearby facilities would not be unduly lengthy or strenuous.
- 5.6.17 When considered alongside the proposed improvements to Slyne Road—designed to enhance access for all users—and the inclusion of a new active travel connection to the south of the site, the development is considered to be located in an accessible location. It would provide future residents with a genuine opportunity to make regular, everyday journeys on foot.
- 5.6.18 There are cycle routes in the surrounding the area including on road routes and off-road cycle tracks which provide connections to the city centre, major employment areas and leisure and education facilities. Most notable would be the Greenway (linking Lancaster and Morecambe) and along the Bay Gateway. Subject to safe connections to these routes (and others), it is considered cycling could also be a realistic mode of travel for future residents. Whilst this is the case, it is acknowledged connections to the wider more strategic cycle network are generally unlit and will not be attractive to all users, including those less confident or vulnerable.
- 5.6.19 The proposal includes improvements to the existing informal track located in the southwest corner of the site, providing a connection to Lancaster Road. These improvements are expected to include resurfacing and lighting, although the final details would be subject to a planning condition and separate approval by the local highway authority. The applicant is also committed to supporting the improvements to the surfacing of Powder House Lane (to support the active travel connections in this location) and the potential implementation of an "access only" or "except access" scheme for this road. The final scheme would be secured by condition and should ensure use by horse riders is not compromised.
- 5.6.20 In terms of public transport, the area is well served by existing bus services. The closest bus stops are located on Lancaster Road close to the junction with Hyde Road. There are regular daytime, evening and weekend services running between Lancaster University and Overton via the city centre, Morecambe and Heysham. The CIHT recommend a 400m walking distance between new residential development and a bus stop/services. The applicant's submission acknowledges the nearest bus stop is closer to c500-600m and is above the recommended distance for parts of the site. Although this is the case, given the good level of bus services operating in the area and with the upgraded active travel connections to the south of the site, travelling by bus is also a genuine option for future residents.
- 5.6.21 Access to rail services would require walking to Bare Lane Station, which is located around 1.2km from the centre of the site or alternatively using bus services to access Lancaster Railway Station. Services from Bare Lane to Lancaster are hourly (Mon-Fri) and 2 hourly (weekends). Lancaster railway station offers regular rail connections regionally and nationally. Whilst the walking distances to Bare Lane station is above the preferred maximum distances, it remains an option for some future residents wishing to travel potentially further afield via rail.
- 5.6.22 Active Travel England (ATE) are a statutory consultee for developments over 150 housing units. ATE raised initial concerns to the original submission due to the lack of detail over the active travel access points and routes and the quality of such routes. Following consideration of the applicant's submitted Highway Technical Note and the amendments to the scheme, ATE raise no objection to the proposal. This is subject to a requirement to ensure the internal layout meets the requirements of the National Design Mode, Inclusive Mobility and LTN 1/20. The layout is not a consideration at this stage. Notwithstanding this the applicants Design and Access Statement supports consideration of LTN 1/20, which is included as a recommended condition.
- 5.6.23 A Travel Plan will be required for the scheme of development proposed in order to encourage and incentivise active travel. An Interim Travel Plan has been provided with the application, which is

reasonable and proportionate given the outline nature of the scheme. A full Travel Plan shall be secured by planning condition with a contribution required towards Travel Plan mentoring. This is agreed with the applicant.

- 5.6.24 Overall, the development is considered to be sustainability located to support and encourage the use of alternative sustainable modes of transport and therefore accords with planning policy in this regard. There are no significant adverse effects arising from the development on the pedestrian and cycle environment. In fact, betterment will be provided through the proposed off-site improvements works.
- 5.6.25 Traffic Impacts
The proposed development will give rise to increased traffic during construction and once operational. There is strong opposition to the development on the grounds of highway safety particularly given the current highway constraints along Slyne Road/Hasty Brow.
- 5.6.26 The submitted TA and the Traffic chapter of the ES has robustly considered the impacts of additional traffic having regard to the existing and future baseline scenarios, existing highway constraints and accident data. The methodology and outcomes of the amended TA and that set out in the ES are not disputed by the Local Highway Authority or National Highways and are therefore considered robust in assessing the significance of the effects arising from the development. The baseline data has also informed the noise and air quality sections of the ES.
- 5.6.27 The submitted Transport Assessment predicts a total of 74 two-way trips in the AM peak and 70 in the PM peak. This has reduced by approximately 40 trips following the amendment to the development. These trip rates have been used when modelling the effects on the local highway network. A detailed assessment of the increase in traffic on the local network at key junctions, based on existing and future traffic flows, is provided in the ES.
- 5.6.28 The highway impacts of the traffic predicted to be generated by the development have been properly assessed at key junctions within the local road network, as set out in the submitted Transport Assessment. For all junctions assessed, the development is considered acceptable from an operational highways perspective, with residual traffic effects classified as negligible.
- 5.6.29 The local highway authority has raised no objection to the proposed development, subject to mitigation in the form of a financial contribution towards improvements to the wider highway infrastructure, as set out in the Lancaster Travel and Transport Infrastructure Strategy. The assessment of the development in isolation is agreed to cause a negligible adverse effect. However, when taking into account the growth ambitions within the Local Plan and the wider strategic highway infrastructure constraints, the level of effect could arguably be greater than predicted in the ES. Nevertheless, with mitigation (the highways contribution), the effects arising from the development on the wider network would be negligible.
- 5.6.30 The local highway authority has advised that the contribution figure has been calculated using a gravity model, which assesses the development's impact on various parts of the network based on the scale, type, and location of the development in the context of the adopted Local Plan. This model also incorporates the estimated costs of the associated infrastructure works. The funding will support the delivery of strategic improvements aimed at increasing network capacity and promoting sustainable travel.
- 5.6.31 The requested contribution equates to **£4,386.66** per dwelling. Based on a development of 130 dwellings, this would total approximately **£570,266**. The final figure would be confirmed at the reserved matters stage and apportioned across the five key initiatives identified within the Infrastructure Strategy. These initiatives include:
- The City Centre Gyratory
 - A6 Slyne Road and other key feeder roads
 - The local highway network surrounding M6 Junction 34
 - Strategic highway improvements across Lancaster and Morecambe
 - Wide-load route management enhancements
- 5.6.32 Given the likely distribution of trips generated by the development, these initiatives are considered directly related to its impacts. The contribution would also support local improvements, such as those

to the Shrimp Roundabout, which the submitted Transport Assessment acknowledges will operate over capacity.

- 5.6.33 Without contributions to mitigate the impacts of the development and support the delivery of strategic highway infrastructure, it is anticipated there would be severe impacts in terms of both safety and congestion around Lancaster and Morecambe's highway network. Policy DM58 and DM64 also support contributions to mitigate impacts to highway infrastructure.
- 5.6.34 The Local Highway Authority's contribution request is supported by the applicant and is proposed in addition to the off-site highway improvement works proposed to enhance active travel between the site and the local area and deliver the proposed new access. In light of this, the proposed development is considered compliant with the Local Plan policies and the NPPF in relation to traffic impacts.
- 5.6.35 National Highways are responsible for the strategic road network (SRN). Following further information (Technical Note) and the amendments to the scheme, National Highways have confirmed they have no objection to the development, noting the development will not have a material impact on the safe operation of the SRN and junction 34.
- 5.6.36 During construction, there will be a requirement to secure a Construction Method Statement dedicated to ensuring the local highway network is not unduly compromised during this phase of development. This will aim to control matters pertaining to construction access and egress, the location of site compounds, operative parking, loading and unloading, wheel washing (to avoid debris on the highway) and construction vehicle routing. In this case, the concern will relate to ensuring larger HGV avoid Hasty Brow/Slyne Road due to the bridge restrictions. The ES assessment concludes the effects arising from construction traffic will be short term and temporary and therefore negligible. There are no reasons to dispute this, despite the valid concerns from local residents.
- 5.6.37 Parking
Policy DM62 sets out the Council's maximum parking standards for new development. The submission indicates the development will be designed to meet the requirements of policy DM62 with the details provided as part of the layout considerations through reserved matters. Parking is not explicitly a reserved matter, therefore a condition is recommended to control the provision of the parking prior to occupation of respective dwellings, together with access and turning provision via the internal estate roads. There is an expectation for all roads (subject to the street hierarchy and design at reserved matter stage) to be designed to adoptable highway standards.
- 5.6.38 Conclusion
In conclusion, the proposed access strategy—including pedestrian and cycle connections—together with the proposed mitigation measures to enhance active travel opportunities from the site towards Torrisholme village and Lancaster Road (via the existing built environment), and the financial contribution towards strategic highway infrastructure improvements, enables officers to conclude that, on balance, the proposal is acceptable.
- 5.6.39 The applicant has robustly demonstrated that safe and suitable access can be provided for all modes of transport and that the additional traffic generated by the development can be safely accommodated on the local highway network without resulting in significant adverse impacts. There are no highway safety objections from the statutory consultees. Therefore, despite concerns raised to the contrary, there are no technical highway grounds on which to withhold planning permission.
- 5.7 **Flood Risk and Drainage** NPPF Chapter 14 (Meeting the challenge of climate change, flooding and coastal change); Strategic Policies and Land Allocations (SPLA) DPD policy SP8 (Protecting the Natural Environment); Development Management (DM) DPD policies DM33 (Development and Flood Risk), DM34 (Surface Water Run-off and Sustainable Drainage), DM35 (Water Supply and Waste Water) and DM36 (Protecting Water Resources and Infrastructure).
- 5.7.1 Strategic policy seeks to ensure that new growth within the district is located in the areas at least risk of flooding (following a sequential approach), does not create new or exacerbate existing flooding, and aims to reduce flood risk overall. Both Local Plan policy DM33 and the NPPF require a sequential approach to development in respect of flood risk. If a site contains areas of medium or high risks of flooding, taking into account all sources of flood risk, a sequential test would be required

to demonstrate that there are no sites at a lower risk of flooding where the development could be located. The NPPF and the above referenced DM DPD policies require development to be in areas at least risk of flooding (following the sequential and exception tests) and for major proposals to ensure surface water is managed in a sustainable way accounting for climate change.

- 5.7.2 A Flood Risk and Drainage Assessment (FRA) has been produced which informs the Water ES chapter. This has been amended in response to the revised scheme and changes in policy and flood date during the determination of the application. The application is also supported by an updated and flood risk sequential test (FRST).
- 5.7.3 The applicant's FRA clearly identifies that the proposed development lies within Flood Zone 1 and is therefore suitable to support residential development. However, the SFRA recognises that the EA flood maps for planning do not address climate change. Accordingly, the FRA has appropriately had regard to the Strategic Flood Risk Assessment identifying the site is at risk of tidal flooding in the future scenario (within the lifetime of development) as well as increased future surface water flood risk in the areas around the existing watercourses. These watercourses are identified as Flood Zone 3B (in the SFRA). The applicant has satisfactorily demonstrated the site is not at risk of groundwater flooding through detailed site investigations. The applicant's site specific FRA contends the flood risks are low for all sources except tidal flooding. For this reason, a FRST accompanies the application.
- 5.7.4 In accordance with the PPG, the broad scope of the assessment was discussed and agreed with the local planning authority before submission. Given the scale of the development and the nature of the proposal (housing to meet a district need), it was agreed that the area of search to review alternative sites could be limited to the main urban areas and sites on the edge of the urban areas within Lancaster district (Lancaster, Morecambe, Heysham and Carnforth).
- 5.7.5 The purpose of the sequential test is to consider whether there are any reasonably available sites suitable to accommodate the proposed development that are at a lower risk of flooding than the application site. PPG (028) states '*reasonably available sites*' are those in a suitable location for the type of development with a reasonable prospect that the site is available to be developed at the point in time envisaged for the development [our emphasis]. These could include a series of smaller sites and/or part of a larger site if these would be capable of accommodating the proposed development. Such lower-risk sites do not need to be owned by the applicant to be considered 'reasonably available'.
- 5.7.6 The applicant has undertaken a robust FRST looking extensively at other sites, drawing reasonable comparison in relation to their respective flood risks, and assessing whether any alternative sites are available. Given the amendments to the development, now largely avoiding the areas at risk of future tidal flooding, of the sites assessed there are few sites that could be considered sequentially preferable in flood risk terms, including Lundsfield Quarry given the extent of groundwater flood risk across the whole site. For all remaining sites, the applicant has demonstrated the sites are also unavailable to the applicant. Officers are therefore satisfied the FRST is passed in accordance with policy DM33 and the NPPF.
- 5.7.7 Having passed the FRST, it still needs to be demonstrated that the development is safe for its lifetime and does not increase the risk of flooding elsewhere.
- 5.7.8 Paragraph 181 of the National Planning Policy Framework (NPPF) requires applicants to demonstrate, through a site-specific Flood Risk Assessment (FRA), that:
- The most vulnerable development within the site is located in areas of lowest flood risk, unless there are overriding reasons for an alternative location;
 - The development is appropriately flood-resistant and resilient, such that it can be brought back into use quickly after a flood event without significant refurbishment;
 - Sustainable Drainage Systems (SuDS) are incorporated, unless there is clear evidence that this would be inappropriate;
 - Any residual flood risk can be safely managed; and
 - Safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

- 5.7.9 Paragraph 182 further requires that applications with potential impacts on drainage should incorporate SuDS to control flow rates and reduce runoff volumes. These systems should be proportionate to the scale and nature of the development and, wherever possible, deliver multiple benefits. For major developments, SuDS should:
- Take into account advice from the Lead Local Flood Authority (LLFA);
 - Have appropriate minimum operational standards;
 - Include maintenance arrangements to ensure effective operation for the lifetime of the development.
- 5.7.10 Policy DM34 of the Development Management DPD sets out that surface water must be managed sustainably in all new development. The Council expects proposals to utilise SuDS as a priority, particularly naturalistic solutions integrated into the site's soft landscaping, delivering multifunctional benefits as part of a high-quality green and blue environment.
- 5.7.11 The SFRA has designated all ordinary watercourses, potential culverts, drainage channels and flood risk management features as Flood Zone 3b which, by definition, is functional floodplain. Therefore, development within floodzone 3b is prohibited unless there are exceptional circumstances (policy DM33). Accordingly, the applicant has responded to the SFRA and has amended their proposal substantially to remove the development platforms where the watercourses are located. The original proposal including the removal and division of the watercourses, the formation of development platforms and extensive earthworks to mitigation against the tidal flood risk within the lower parts of the site. There are no proposals relating to the watercourses. These will be retained (along with the landscaping) and incorporated into the open space and BNG proposals and enhanced with additional SUDS features as part of the drainage strategy.
- 5.7.12 The main focus of the FRA is to demonstrate the development is safe and does not increase the risks off-site having regard to the future tidal flood risk. The submission outlines the proposed development would be inundated during the Undefended 1 in 200-year Higher Central and Upper End Climate Change scenarios. It has to be acknowledged, that this undefended tidal flood risk affects a much larger area of Heysham and Morecambe and not just the application site. Nevertheless, with the changes to the scheme, the flood risk affects relatively small sections of the development platforms.
- 5.7.13 The future tidal design flood level is 7.9m AOD. The revised developable platforms remove large areas of flood risk from the location where dwellings would be proposed. Only small sections of the southern and western parcels of the developable areas are affected by the Upper end Climate Change flood extent. Based on the indicative masterplan, this appears to affect around 30 dwellings. To mitigate this risk, all properties would need to have a finished floor level (FFL) of 8m AOD with residual effects managed through careful flood risk management (evacuation plans). The proposed access shall be provided at around 9m AOD therefore safe access and egress can be provided. This approach is accepted by the Environment Agency who have raised no objection to the development based on the revised proposals and the updated FRA. Having regard to the proposed flood risk mitigation, the ES concludes the development would have a negligible effect (not significant) on all potential sources of flooding and water resources. Having further regard to the comments from statutory consultees, this assessment is considered robust and reasonable. It is necessary to impose a planning condition to secure the development is built out in accordance with the specific flood risk mitigation within the FRA.
- 5.7.14 The proposed drainage strategy has been informed by the baseline flood risk conditions and a wider catchment analysis and accounts for an additional 4ha of potential run-off to be directed around the site. The proposed surface water drainage strategy looks to positively drain the impermeable areas of the development site (the precise details controlled by condition when the layout of the development is known) at a controlled greenfield discharge rate (20l/s) with capacity sufficient to meet current best practice taking into account the required climate change allowances (in this case 45%) an urban creep.
- 5.7.15 Infiltration testing has been carried out on site, though this is not extensive and requires further investigation. However, of the tests undertaken, infiltration has proven unviable as the sole method of disposing of surface water. Given the network of watercourses on site, the alternative (in full or part) would be to drain to an existing watercourse. Surface water will not drain to the existing sewer network. The proposed drainage strategy will ensure surface water flows from the development are

directed to the new drainage infrastructure, potentially reducing current flows to existing outfall pipes below Lancaster Road.

- 5.7.16 The strategy outlines a series of swale and attenuation basins across the site which positively contribute to the delivery of a genuine sustainable drainage system with multifunctional benefits (design, biodiversity flood risk and open space). The precise details of any SuDS features will be a matter secured by condition (associated with the final drainage scheme) and the layout determined at reserved matters stage.
- 5.7.17 Despite local concerns over the increase in potential flooding arising from the development, the applicant has provided technical evidence to demonstrate the development can be drained without increasing the risk of flooding on or off site. The Lead Local Flood Authority has no objection to the development subject to the imposition of conditions to secure the final drainage scheme (based on the broad principles of the submitted and amended drainage strategy, a surface water construction management plan, a detailed management and maintenance plan for the approved scheme and a verification condition to demonstrate the approved drainage scheme has been installed.
- 5.7.18 Non permeable areas would naturally drain into the existing network on site and any land drainage requirements would be managed separately from the designed system. Foul drainage will connect to the public sewer to the satisfaction of United Utilities, who have raised no objection to the development.
- 5.7.19 Considering the above, and with the imposition of suitable flood risk and drainage planning conditions, it has been demonstrated that the development can be safe from flood risk and that the development would not result in a flood risk elsewhere over the lifetime of the development. It is contended that there are no flood risk or drainage grounds to resist the proposal and that the development accords with the NPPF and Local Planning policies in this regard. Impacts are not therefore considered significant in the context of the EIA regulations.
- 5.8 **Biodiversity and Trees** NPPF section: 15 (Conserving and enhancing the natural environment); Strategic Policies and Land Allocations (SPLA) DPD policies: SP8 (Protecting the Natural Environment and EN7 (Environmentally Important Areas); Development Management (DM) DPD policies DM29 (Key Design Principles); DM43 (Green and Blue Infrastructure), DM44 (Protection and Enhancement of Biodiversity) and DM45 (Protection of Trees, Hedgerows and Woodland).
- 5.8.1 Strategic policies SP8 and EN7 both recognise the importance and value of biodiversity within the district and expects development proposals to protect, maintain and enhance biodiversity. This policy position is reflected in the Development Management DPD policies. Policy DM44 states development proposals should protect and enhance biodiversity and, as a principle, there should be net gain of biodiversity assets wherever possible. The policy goes on to state that where harm cannot be avoided, it should be mitigated and as a last resort compensated for, and where a proposal leads to significant harm, planning permission should be refused. Policy DM45 identifies the importance of retaining trees, woodland and hedgerows where they positively contribute to visual amenity, landscape character and/or the environmental value of an area. This policy expects new development to positively incorporate existing trees and hedgerows and where this cannot be achieved, the losses must be justified and mitigated. Policy DM45 seeks to maximise and encourage new tree and hedgerow planting of indigenous species to mitigate the wider impacts of climate change and to enhance the character and appearance of the district.
- 5.8.2 Ecology forms one of the chapters of the submitted ES and has been updated in the ES Addendum to reflect the changes to the proposal. The ES seeks to provide an objective and transparent assessment to the ecological effects of the development having regard to relevant policy, published guidance and legislation relating to the nearby designated sites and protected species. A Preliminary Ecological Appraisal Biodiversity Net Gain (BNG) report and Metric inform the impact assessment (as part of the ES).
- 5.8.3 Designated Sites
The site is located within 1.4km from Morecambe Bay and Duddon Estuary Special Area of Protection (SPA), Morecambe Bay Special Area of Conservation (SAC) and Morecambe Bay Ramsar site, in addition to the Morecambe Bay Site of Special Scientific Interest (SSSI). Given the proximity of the site to the designated areas, there is the potential for the development to have an

adverse impact on their integrity both during construction and operational phases of the development. A shadow Habitats Regulations Assessment has been submitted with the application. It is considered that mitigation is required in relation to potential adverse effects and therefore an Appropriate Assessment has been undertaken.

- 5.8.4 The Local Planning Authority has adopted the submitted shadow Habitat Regulations Assessment (and Appropriate Assessment) to fulfil its duty as the competent authority. In relation to potential effects the applicant has sufficiently demonstrated, to the satisfaction of Natural England and our own ecologists (GMEU), that the development would not directly impact the designated sites and is not considered to be functionally linked land. This is in the knowledge of low numbers of some qualifying species being recorded on the site, such as Lapwing. The potential for likely significant effects on the integrity of the designated sites therefore arises from indirect effects arising from the development. This includes pollution pathways and recreational disturbance.
- 5.8.5 The Appropriate Assessment concludes that the proposal will not result in adverse effects on the integrity of any of the designated areas subject to appropriate mitigation being secured by condition. For potential impacts during construction, the submission acknowledges mitigation in the form of good pollution control is embedded into the scheme. Once operational, the sHRA notes the proposed sustainable drainage strategy (a series of swales) will attenuate flows and mitigate pollution outflows, providing further embedded mitigation. Whilst the recommendations of the sHRA do not explicitly require a construction method plan or sustainable drainage scheme, these are standard requirements for any development and will support and help mitigate against any residual risk to the designated sites. These measures shall be controlled by planning condition.
- 5.8.6 In relation to recreational disturbance, whilst there are no direct routes to the designated sites from the application site, the site is close enough to result in the potential uplift in use of the coastal area for recreational purposes. To mitigate against this residual risk, homeowner packs will be required. The purpose of such is to highlight the importance of the designated sites, set out relevant codes of conduct and share details of alternative areas for recreation away from the designated site. The provision of homeowner packs can be secured by planning condition.
- 5.8.7 Additional mitigation will be achieved through the provision of on-site public open space. The development includes extensive open space, as outlined in the Green and Blue Infrastructure Strategy. This comprises large areas of semi-natural green space, along with other open space typologies, offering opportunities for informal recreation, walking, and dog exercise. Furthermore, the development integrates active travel links that connect well to a broader network of footpaths, supporting accessible and convenient circular routes for regular recreational use. To ensure the proposed open space is sufficiently protected, safeguard and managed and maintained to provide long term mitigation against recreational disturbance, a Landscape and Ecology Management Plan (LEMP) is proposed. This is capable of being secured by condition or as part of the wider Biodiversity Net Gain (BNG) management and maintenance obligations in the s106 legal agreement.
- 5.8.8 Without mitigation, the proposed development could have detrimental impacts upon Morecambe Bay SAC, Morecambe Bay and Duddon Estuary SPA and Morecambe Bay Ramsar site. The ES considers this to be a moderate to minor adverse significance of effect. However, with the implementation of the mitigation outlined above, it is considered that the proposed development will have no significant adverse effects (negligible) on the integrity of the designated sites, their designation features or their conservation objectives, through either direct or indirect impacts either alone or in-combination with other plans and projects. Officers are satisfied with the assessment and concur with the outcomes of the sHRA, for which the LPA will adopt as its own, in exercising its duty under the Habitat Regulations. The mitigation measures can be adequately covered by a condition attached to any planning consent. Both GMEU and Natural England concur with the conclusions of the sHRA and the need to secure the mitigation identified.
- 5.8.9 In this regard, it is considered the development, with mitigation, would accord with the requirements of the Habitat Regulations, strategy policy SP8 and policy DM44 of the DM DPD.
- 5.8.10 Ecological Impacts
The application has been supported by a preliminary ecological appraisal (PEA), which has been updated during the determination of the application to address concerns raised by the Council's ecology advisors, GMEU. This has informed the Ecology section of the ES and ES Addendum.

- 5.8.11 The site comprises arable, modified and neutral agricultural grassland with hedgerows and scattered trees which divide the site into numerous fields. The field pattern and hedgerows on site appear to be historic. Around 172 metres of hedgerow are described as species rich with the remaining 1759 metres considered to be species poor. Nevertheless, these are considered to be priority habitat with greater than local value. There are also a number of ditches/watercourses within the site.
- 5.8.12 The development of the site will inevitably result in the loss of existing habitats and some disturbance to species currently using the area. A number of public objections have been received, raising concerns about the potential loss of biodiversity and impacts on protected species. The original submission also attracted an objection from the Local Planning Authority's ecologist (GMEU).
- 5.8.13 However, the amended proposal represents a significant improvement in terms of its ecological impact. While some habitat loss and the potential for disturbance associated with the introduction and extension of the urban edge remain, the revised scheme demonstrates a more sensitive and considered approach to ecology and biodiversity.
- 5.8.14 The PEA and the ecology chapter of the ES and ES Addendum consider the effects on protected species and habitats during construction and once operational. It is recognised the loss of habitat (grassland and hedgerows) will result in permanent effects of moderate-minor adverse significance. However, with the incorporation of mitigation (retention of habitat where possible, provision of bird and bat boxes, sensitive lighting, species rich landscaping) the adverse effects will be minimised. In the case of amphibians (great Crested Newts) and despite objections to the contrary, the risk of GCN being on the site is considered low following the results of the eDNA surveys and given that further habitat is now retained. The application sufficiently evidences the impact of the development on these species is not considered to be harmful and would arguably result in minor beneficial residual effects once mitigation is provided. Mitigation will be in the form of new waterbodies and SuDS features provided on the site.
- 5.8.15 GMEU are now satisfied that the development will not cause significant harm to protected species subject to conditions requiring suitable method statements to safeguard protected species during habitat clearance and construction and to secure appropriate ecological enhancement measures, as set out in the submitted PEA. Some additional survey effort is required to inform accurate mitigation when the detailed scheme is known (at reserved matters stage).
- 5.8.16 Subject to conditions securing the above mitigation, it is contended the development would not conflict with policy DM44 and mitigation can be secured to ensure there is no significant adverse effect to protected species or priority habitat. The landscaping scheme, which will form part of the reserved matters application, must have regard to the requirements of the PEA and the relevant ecological conditions. The layout of the development should be based on a greater level of retention of the historic hedgerows.
- 5.8.17 The residual effects identified in the ES are agreed and considered robust, noting there is no permanent significant adverse effect on ecology arising from the development. The residual effects range between minor adverse and moderate-minor beneficial.
- 5.8.18 Trees and Hedgerows
The application has been supported by an Arboricultural Impacts Assessment (AIA) and Tree Survey. This has been updated during the consideration of the application to reflect the amended proposals.
- 5.8.19 The field pattern appears to have changed little since the site was surveyed in 1891, indicating that the hedgerows could be of historic 'importance'. The hedgerows, which have developed into attractive linear features, are shown on the OS map Lancashire sheet 30, published in 1895. The site is outside any conservation area and no trees are currently covered by a tree preservation order.
- 5.8.20 The AIA identifies 17 individual trees, 18 groups and 14 hedgerows, both within and bordering the site. Trees and hedgerows are an important feature of the site, all contribute to the character of the local area and are of notable wildlife and public amenity value, being visible from a range of public

domains. The hedgerows also form the backdrop to neighbouring properties off Russel Drive. One tree T3, a mature oak, is identified as having veteran features.

- 5.8.21 The largest volumes of mature tree stock are located in the southern section of the site. This area is indicated as open space within the Parameters Plan and therefore provides good opportunities for substantial tree and hedgerow retention. With the developable areas, the existing trees and hedgerows should guide the layout of the development, though it is expected some removals will be required to create the development platform to mitigate against flood risk and to secure the access proposals.
- 5.8.22 Approximately 120m of hedgerow and several trees will need to be removed to facilitate the access point off Slyne Road and deliver the off-site highway works. These losses will be compensated by substantial new tree and hedgerow planting across the Site. Any further losses will need to be justified, and appropriate mitigation put in place as part of the landscape proposals at reserved matter stage. The AIA indicates there may be scope to translocate some roadside hedgerows. Details of this would be expected within Arboricultural Method Statement controlled by planning condition.
- 5.8.23 The Parameters Plan provides the potential to support the retention and protection of important category A and B Sycamore trees in the southwestern part of the site, though careful attention will be need at reserved matters stage to ensure these trees are successfully integrated into the design of the development. A detailed impact assessment, including tree protection plans and method statements will be required. This can be secured by planning condition.
- 5.8.24 The Council's Arboricultural Officer has not raised an objection, but does stress the need for the layout of the development at reserved matters stage to work with and around existing landscape features. The officer positively comments on the desire (within the AIA) to try and preserve historically important boundaries but, without the precise details, it is difficult to ascertain if this proposal will positively incorporate existing trees and hedgerows. Given the outline nature of the proposal, an updated AIA will be required to set out clear tree protection measures and any necessary method statements for works within close proximity to trees and hedgerow planned for retention.
- 5.8.25 Overall, it is considered that the tree losses and hedgerow removals required to form the site access would not lead to unacceptable impacts, with the losses capable of being compensated for as part of the landscaping proposals at reserved matters scheme. Except where it is not possible for justified reasons, the application has demonstrated the subsequent reserved matters application can positively incorporate existing trees and hedgerows within the development. Where this is not possible, there is sufficient space on the site to accommodate the losses to comply with policy DM45 of the DM DPD.
- 5.8.26 Biodiversity Net Gain (BNG)
The submitted application is not subject to mandatory BNG and is exempt because of when the application was submitted. However, the NPPF and Local Plan policies still encourage new development to make positive contributions towards BNG.
- 5.8.27 The application has been supported by an updated Biodiversity Net Gain Assessment (Version 6 dated July 2025) following the amendments to the scheme and comments received from GMEU in response to earlier consultations.
- 5.8.28 The site currently comprises a mix of area habitat (36.17 biodiversity units), linear habitat (17.83 biodiversity units) and includes on-site watercourses (1.37 watercourse units). Following the amendments, there is now a significantly greater level of on-site habitat retention, though losses are still anticipated to accommodate the site access and the off-site highway works and the formation of the development platforms. The greatest impact is on existing hedgerows, though the full extent is unknown and would be determined through the reserved matters application.
- 5.8.29 Despite these potential losses, the submitted BNG report and metric demonstrates the site is capable of delivering significant net gains in biodiversity. The assessment indicates the potential to secure

30.5% net gains in area habitat and 39% net gains in watercourse units. Based on the assessment at this stage, it is anticipated a net loss of -3.23% in linear habitat. The post-development BNG metric will be subject to change and refinement as landscaping forms part of the reserved matters. Subsequently, there is an expectation that any forthcoming landscaping design for the site firstly aims to retain as much habitat as possible and adequately mitigates the losses, especially in relation to in hedgerows. Overall, officers are satisfied that there is scope within the site, or potentially off-site (and in the applicant's control) to ensure that a minimum of 10% net gains in biodiversity (across all unit types) can be secured. The level of on-site BNG would be considered significant and therefore will be secured via planning obligation, alongside a habitat management and monitoring plan.

5.8.30 Our ecology advisors, GMEU, have now removed their initial objection and are satisfied meaningful net gains in biodiversity can be secured as part of this development proposal. GMEU has also confirmed acceptance of the BNG baseline metric to inform the BNG plan at reserved matters stage and echo the requirements for the BNG to be secured, managed and maintained (for 30 years) by planning obligation.

5.8.31 Subject to the imposition of planning conditions and a planning obligation to secure net gains in biodiversity on this site, it is contended that proposals accord with the requirements of policy DM44 and the Framework.

5.8.32 Overall, the development is not considered to give rise to significant environmental effects in relation to ecology provide the identified mitigation is appropriately secured, including long term habitat and landscape management and monitoring. The level of effect is ranges between slight-adverse to moderate-minor beneficial when taking into account the potential for ecological enhancements and BNG on site.

5.9 **Residential Amenity** NPPF sections: 8 (Promoting healthy and safe communities), 12 (Achieving well-designed places), 15 (Conserving and enhancing the natural environment - noise and pollution); Development Management (DM) DPD policies DM29 (Key Design Principles), and DM57 (Health and Well-Being).

5.9.1 Paragraph 198 of the NPPF requires planning policy and decisions to ensure new development is appropriate for its location, taking into account the likely effects of pollution on health, living conditions and the natural environment. To achieve this, it is necessary to avoid noise impacts giving rise to significant adverse effects and to mitigate and reduce potential adverse effects resulting from noise from new development. Policy DM29 of the DM DPD and paragraph 135 of the NPPF is also relevant in the context of assessing the effects of development on residential amenity. Both strongly advocate the need for new development to be of high standard of design ensuring high standards of amenity are maintained and secured for existing and future users. Policy DM29 specifically state that new development must ensure there is no significant detrimental impact to amenity in relation to overshadowing, visual amenity, privacy, overlooking, massing and pollution.

5.9.2 There are two main factors to consider in the assessment of amenity in this case. The first is the effect of the development on the amenity of existing residents. The second relates to the standard of amenity for future occupants of the development. In the case of the latter, noise considerations are important given the position of the site adjacent to the surrounding transport network.

5.9.3 Effects on existing residents
The application site is located on the eastern edge of Torrisholme, adjacent to the urban area of Morecambe. The surrounding area is predominantly residential in character, with Russell Drive being the most directly affected. A significant proportion of the objections received have come from residents living adjacent to, or in close proximity to, the site, expressing concerns about potential loss of amenity resulting from the proposed development.

5.9.4 As the application is submitted in outline, matters relating to the scale, appearance, and layout of the proposed residential development are not for determination at this stage. Consequently, specific impacts on individual properties cannot yet be fully assessed. These details will be considered at the reserved matters stage. However, the submitted Parameters Plan and Green and Blue Infrastructure Strategy establish a framework that allows for an initial assessment of the potential effects on nearby residents.

- 5.9.5 The submitted Design and Access Statement indicates the dwellings proposed would be predominately 2 - 2.5 storey dwellings. This is reflected in the landscape and visual impact assessment. This scale of development would reflect the typical character of surrounding residential development and does not pose a significant concern. To comply with policy DM1 (housing need) there is a policy requirement to provide bungalows as well as conventional housing. The submission suggests there is some potential for 3-storey buildings (such as an apartment block) therefore a maximum parameter of three-storey property is proposed. While there are isolated examples of three-storey development in the wider locality, any such proposals would need to be limited in number and carefully assessed at the reserved matters stage against design quality, townscape character, and residential amenity considerations.
- 5.9.6 While many concerns from neighbouring residents remain, the amended Parameters Plan has significantly reduced the potential impacts on residential amenity compared to the initial proposals. The revised plan now removes the developable areas from immediately behind most properties on Russell Drive. Whilst this amendment may not fully address all concerns raised, it does represent a notable improvement in the potential outlook existing residents may experience should the development proceed.
- 5.9.7 The final two pairs of semi-detached dwellings at the northern end of Russell Drive (Nos. 77–63) will, however, back onto the proposed developable area. A buffer of approximately 13–15 metres of open space is proposed between the development platform and these existing properties. The exact nature and treatment of this open space will be determined at the reserved matters stage. Importantly, the 13–15 metre separation refers to the distance between the developable area and the existing properties, not necessarily building-to-building distances, as the developable area may include further open space and landscaping.
- 5.9.8 Ultimately, any reserved matters application will be required to demonstrate that an appropriate level of separation is maintained between new and existing dwellings in this location to ensure acceptable standards of privacy and amenity are achieved, in accordance with Policy DM29. Officers are satisfied the site can accommodate the proposed development and adhere to these standards.
- 5.9.9 The potential impact on residential amenity extends beyond the physical presence of new buildings. It is acknowledged that the character of the site would change significantly—from open fields and arable land to a new residential development incorporating substantial areas of open space. This transformation in land use raises understandable concerns among existing residents, particularly in relation to the interface between the proposed open space and existing properties. Key issues include perceived impacts on security, overlooking, loss of privacy, and noise.
- 5.9.10 The proposed Green and Blue Infrastructure Strategy goes some way to alleviate concerns. This demonstrates a commitment to retain existing trees and hedgerows where possible outside the developable areas. These existing landscape features, which can be bolstered as part of the landscaping proposals at reserved matters stage, can help enclose and create separation between play provision and existing dwellings.
- 5.9.11 Active travel routes are identified within the Green and Blue Infrastructure Strategy, including pedestrian connections through the site and along the western boundary. The precise alignment and design of these routes will be determined at the reserved matters stage as part of the site layout considerations. It is acknowledged that some objectors have expressed concerns about pedestrian routes running along the rear boundaries of existing properties. These concerns—particularly relating to privacy, safety, and security—are understandable and valid.
- 5.9.12 However, any future detailed design would need to ensure that the safety and security of existing residents is not compromised, and that the development incorporates appropriate levels of natural surveillance across areas of open space, consistent with principles of good design. Whilst these matters will need to be carefully addressed at the detailed design stage, they are not considered to be grounds to withhold outline planning permission on residential amenity grounds.

5.9.13 A new housing estate to the rear of Russell Drive will also alter the character of the area by introducing lighting, noise and traffic. Precise details of all external lighting will be a matter controlled by planning condition. The design of lighting not only needs to ensure there is no adverse effect on existing and future residential property, but also needs to ensure retained landscape features and habitats are protected from excessive light pollution. Given the location of the developable areas to the retained habitats and existing residents, officers are satisfied light pollution can be minimised and would not lead to significant adverse effects on the environment or the amenity of residents.

5.9.14 Noise and Vibration

The submitted Environmental Statement (ES) provides a comprehensive and robust assessment of the potential noise and vibration impacts arising from the proposed development. The assessment identifies the existing dominant sources of noise at the site as traffic associated with the Bay Gateway, Slyne Road, and the West Coast Mainline.

5.9.15 Construction Phase

The ES acknowledges that the construction phase will result in a degree of disruption and harm to the amenity of existing residential properties and the wider community. This is primarily due to increased noise levels from construction traffic and on-site activities. While some exceedances of acceptable noise thresholds are anticipated, these are identified as minor adverse effects that are short-term and temporary in nature and can be potentially mitigated through considerate working practices, controlling working hours and the use of silencers etc on plant and equipment. Specific measures can be secured by condition requiring a Construction Environmental Management Plan (CEMP). This will also address the identified minor to moderate adverse impacts (along the western boundary) associated with potential impacts arising from vibration caused through construction activities.

5.9.16 Operational Phase (existing residents)

The operational phase noise impacts are largely associated with changes in traffic patterns along surrounding roads. This chapter of the ES has accounted for the traffic generation anticipated from the original proposal (up to 200 dwellings) and therefore represents a worst-case scenario. The increase in traffic is considered to have a long-term adverse impact at the local level but given the background noise levels and the scale of development, this is predicated to be negligible and not significant.

5.9.17 Operational Phase (future residents)

The noise and vibration assessment has been undertaken in accordance with best practice guidance and relevant national policy, including:

- The Explanatory Note of the Noise Policy Statement for England (Defra, 2010);
- BS 8233:2014 – Guidance on Sound Insulation and Noise Reduction for Buildings;
- Comparable criteria from the World Health Organisation (WHO).

5.9.18 The assessment provides a detailed assessment of the baseline conditions during the daytime and night-time periods. During the daytime, noise levels range between 53dB and up to 60dB. Most of the site is considered to be at negligible risk, with areas alongside the Bay Gateway and Slyne Road at low risk. For the low risk areas, good acoustic design can minimise the level of effect. During the night-time the noise levels range between 48dB and up to 55dB, resulting in most of the site between low risk and medium risk. The medium risk areas are closest to the adjacent highways where mitigation will be required to avoid unacceptable noise impacts.

5.9.19 The ES concludes that good acoustic design should form the basis of mitigation at the reserved matters stage. This includes:

- Informing the layout and orientation of buildings and garden spaces;
- Provision of acoustic fencing, where necessary;
- Whole-house ventilation systems to enable windows to remain closed without compromising internal comfort.

The use of enhanced glazing is not considered necessary across the site, as internal exceedances are only predicted in scenarios where windows are open and directly face existing noise sources. A negligible adverse impact is predicted in the long term, provided the above mitigation is implemented. A planning condition is therefore recommended to secure a site-specific noise mitigation scheme at the reserved matters stage, based on the final layout.

- 5.9.20 The Council's Environmental Health Officer has reviewed the Noise and Vibration chapter of the ES and concurs with its methodology and conclusions. The EHO supports the need for:
- A detailed noise assessment at the reserved matters stage for individual plots;
 - A CEMP to manage construction noise and vibration;
 - Controls on working hours; and
 - Participation in the Considerate Contractors Scheme.
- 5.9.21 The ES has demonstrated that the proposed development can be delivered without resulting in significant adverse effects in relation to noise and vibration. Appropriate mitigation measures have been identified and can be secured through condition.
- 5.9.22 The proposal is therefore considered to be compliant with the National Planning Policy Framework (NPPF) and Policies DM29 (Protection of Residential Amenity) and DM57 (Health and Wellbeing) of the Development Management Development Plan Document (DM DPD).
- 5.10 **Housing needs, affordable housing, housing standards and mix** NPPF Chapter 5 (Delivering a sufficient supply of homes); Development Management (DM) DPD policies: DM1 (Residential Development and Meeting Housing Needs), DM2 (Housing Standards) and DM3 (The Delivery of Affordable Housing).
- 5.10.1 Paragraph 61 of the NPPF sets out that to support the government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. The Council's most recent Housing Land Supply Statement (January 2025) identifies a housing land supply of only 2 years (reduced since the earlier resolution), which is a significant shortfall against the required 5-year supply requirement. Paragraph 11 of the NPPF (the presumption in favour of sustainable development) also requires that, where a local planning authority cannot demonstrate a 5-year supply of deliverable housing sites, permission should be granted unless the application of policies in the NPPF that protect areas or assets of particular importance (such as heritage assets and areas at risk of flooding) provide a clear reason for refusing permission, or any adverse impacts would significantly and demonstrably outweigh the benefits of the proposal, when assessed against the policies in the Framework, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well designed places and providing affordable homes.
- 5.10.2 Given the acute under supply of deliverable housing against our housing requirements, the provision of new residential development (in this case up to 130 dwellings) is a significant benefit of the proposal that must be given significant weight in the overall planning balance. The ES sets out an anticipated delivery programme which indicates, subject to the development getting planning permission, construction is anticipated to start on the site in Spring 2027. With homes potentially being built out at approximately 30 dwellings per year, with the development is anticipated to be completed in Summer 2030. Whilst this is not fixed and could potentially change, delivery of housing could be provided relatively promptly should permission be granted.
- 5.10.3 Policy DM1 requires new residential development to meet identified housing needs that accords with the Council's latest Strategic Housing Market Assessment (SHMA). The required housing mix will be based on the district wide housing needs set out in the SHMA and the indicative mix within table 4.1 of the Development Management DPD (copied here).

Property Type	Market (%)	Affordable (%)
House (2 bedrooms)	20	30
House (3 bedrooms)	35	20
House 4+ bedrooms	25	5
Bungalow	10	10
Flat/apartment (may include 1 bedroom houses)	10	35
Total	100	100

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

- 5.10.4 The application is in outline with no specific details of the housing mix, tenures and size provided at this stage. To ensure compliance with policy DM1, it is necessary to impose a planning condition to

require the precise details of the housing mix, types, and sizes to be agreed concurrent with the reserved matters application.

- 5.10.5 Policy DM2 relates to housing standards, requiring all new dwellings to meet the Nationally Described Space standards and at least 20% of new affordable housing and market housing to meet building regulations M4(2) Category (accessible and adaptable dwellings). To secure these standards at the detailed design stage (reserved matters), planning conditions are proposed as part of this recommendation.
- 5.10.6 Policy DM3 sets out the target requirements for affordable housing for all new residential development in Lancaster District. In this case, the site straddles two parish areas with different affordable housing requirements. In Morecambe the target is 15% of all homes to be affordable homes and in Slyne the target is 30%. Whilst this is an added complication, the final details and the number of affordable homes can be determined at reserved matters stage when the layout and housing mix is understood. The applicant is committed to providing policy-complaint affordable housing across the site and accepts this shall be secured by s106 legal agreement. Given the acute need for affordable housing in the district, the provision of policy-compliant affordable housing also weighs significantly in favour of the proposal.
- 5.11 **Open Space** NPPF Chapter 8 (Promoting Healthy and Safe Communities including Open Space and Recreation), Chapter 12 (Achieving Well-Designed Places); Development Management (DM) DPD policies: DM27 (Open Space, Sports and Recreational Facilities), DM29 (Key Design Principles) and DM57 (Health and Well-Being).
- 5.11.1 The provision of open space forms an important aspect in place-making and securing high quality design. It also potential contributes to the health and well-being of communities. It is strongly advocated within the NPPF, in particular sections 8 and 12. Given the scale of the proposed development, the inclusion of substantial areas of open space—across a range of typologies—is essential to ensure the scheme is policy-compliant (specifically with DM27) and to support the delivery of a well-designed, inclusive, and attractive residential environment.
- 5.11.2 Although the application is in outline form, the Parameters Plan clearly identifies significant areas of open space. The broad design principles for these spaces are outlined in the Green and Blue Infrastructure Strategy and the Design and Access Statement. These documents present a positive, landscape-led approach to design, which is particularly important given the site's location within the KUL, where embedded landscape mitigation is necessary.
- 5.11.3 Overall, the submission demonstrates that the site can deliver policy-compliant on-site open space, including natural and semi-natural green space, amenity green space, equipped play areas, and provision for young people. While detailed matters such as layout and appearance will be addressed at the reserved matters stage, the open space provision will be secured through a legal agreement linked to the outline permission
- 5.11.4 In terms of off-site provision, policy DM27 sets out the planning policy position in relation to 'Open Space, Sports and Recreation Facilities' stating that 'development proposals located in areas of recognised open space, sports and recreational facility deficiency will be required to provide appropriate contributions toward open space, sports and recreational facility provision, either through provision on-site or a financial contribution toward the creation of new or the enhancement of existing open spaces, sports and recreational facilities off-site'.
- 5.11.5 There are recognised deficiencies in the provision of playing pitches and athletics facilities within the local area. Accordingly, a financial contribution towards improvements to these facilities will be required as part of the proposed development. As this is an outline application, the final contribution will be calculated at the reserved matters stage, once the number, type, and size of dwellings are confirmed.
- 5.11.6 The Council's Public Realm team has been consulted and raises no objection to the development, subject to securing appropriate on-site and off-site contributions to public open space. Specifically, contributions will be sought towards the athletics track, football pitches, and associated ancillary

facilities at Salt Ayre. These contributions will be secured through a legal agreement with the final figure calculated at reserved matter stage.

- 5.11.7 The on-site open space provision will be publicly accessible, thereby enhancing the recreational offer for the wider community in the immediate vicinity of the site. When considered alongside the proposed off-site improvements to local sports facilities, these elements are regarded as a positive benefit of the scheme.

5.12 **Education and Health** NPPF section: 8 (Promoting healthy and safe communities - services and school places; Development Management (DM) DPD policies: DM57 (Health and Wellbeing) and DM58 (Infrastructure Delivery and Funding)

- 5.12.1 Paragraph 100 of the NPPF requires local planning authorities to take a proactive, positive and collaborative approach to ensuring there is sufficient choice of education places available and great weight should be given when there is a need to create, expand or alter educational facilities in plan-making and decision-taking. Accordingly, the local planning authority has consulted Lancashire County Council Schools Planning Team who have confirmed there is no requirement for an education contribution at this stage. The School Planning Team advise a final position of the impact of the development on school places should take part as the committee process. Their position was shared in June 2025 and is therefore considered a final up to date position.

- 5.12.2 The NHS Integrated Care Board has made representations on the application and seeks a contribution towards local health care infrastructure. The response sets out that the proposal will generate approximately 312 new patient registrations based on an average household size of 2.4, which generates a contribution of £101,088.

- 5.12.3 The site falls within the catchment area of Lancaster Medical Practice and they have advised that this need, along with other new developments in the area, can only be met through the development of a new practice premises in order to ensure sustainable general practice. The response sets out that the physical constraints of the existing site at Owen Road (this being the closest to the site) that the current premises cannot be extended and opportunities to re-configure existing space to accommodate current growth have already been undertaken. However, the response goes on to say that the growth generated from this development would not trigger consideration of the commissioning of a new general practice but would trigger a requirement to support the practice to understand how the growth in the population would be accommodated and therefore premises options. Therefore, from this response, it is not clear how the contribution would be used.

- 5.12.4 However, additional supporting comments indicate the NHS Integrated Care Board could accommodate growth through the development of a new health centre at Bailrigg. It remains unclear where exactly the health centre would be located, but based on comments relating to other applications, it is understood this relates to the site secured for the hospital. Given the lack of specific details regarding the proposed new health centre — including its location and the expected delivery timescales — there remains significant uncertainty as to whether the NHS request is directly related to the proposed development. As such, and with some reluctance, the local planning authority cannot be satisfied that the contribution would meet the statutory tests set out in legislation and in paragraph 58 of the NPPF. Therefore, the authority is unable to support the NHS's request at this time.

5.13 **Sustainable Design and Renewable Energy** NPPF sections: 12 (Achieving well-designed places) and 14 (Meeting the challenge of climate change, flooding and coastal change); Development Management (DM) DPD policies: DM29 (Key Design Principles), DM30a (Sustainable Design and Construction), DM30b (Sustainable Design and Construction – Water Efficiency), DM30c (Sustainable Design and Construction – Materials, Waste and Construction) and DM53 (Renewable and Low Carbon Energy Generation).

- 5.13.1 In the context of the climate change emergency that was declared by Lancaster City Council in January 2019, the effects of climate change arising from new development in the District, and the possible associated mitigation measures, will be a significant consideration in the assessment of development proposals.

- 5.13.2 The Council is committed to reducing its own carbon emissions to net zero by 2030 while supporting the district in reaching net zero within the same time frame. Buildings delivered today must not only

contribute to mitigating emissions, but they must also be adaptable to the impacts of the climate crisis and support resilient communities.

- 5.13.3 The Climate Emergency Review of the Local Plan (CERLP) was adopted in January 2025 and provided a partial review of the DM DPD and the SPLA DPD. This introduced policies DM30a, DM30b and DM30c which provide specific requirements in relation to sustainable design and construction and also made changes to some other policies.
- 5.13.4 The application was submitted prior to the adoption of the CERLP. However, in response to the changes in policy the applicant has provided an updated Energy Statement. This statement acknowledges the application is in outline form and full SAP calculations to demonstrate compliance with the requirements of policy DM30a are not possible. Nevertheless, the proposed energy strategy provides a clear commitment to meet the required standards in accordance with the energy hierarchy. Policy DM30a requires a fabric first approach to be used in new development, reaching a minimum of 75% reduction in carbon emissions against Part L of the Building Regulations 2013 (expressed as a % uplift of the dwellings Target Emission Rate (TER)). It should be noted, any development build after 1 January 2028 would need to deliver a 100% reduction, opposed to 75%.
- 5.13.5 The submitted Energy Strategy focuses heavily on the Future Homes Standards (FHS) rather than the specific requirements of DM30a. This is not a significant problem as the pre-2028 requirements set out in policy DM30a align with what is anticipated for the FHS. Importantly, the Energy Statement supports the approach set out in DM30a to adopt a fabric first approach and proposes to meet the requirements through well insulated buildings with high degree of air tightness and the provision of decentralised/low carbon heating systems (Air Source Heat Pumps). This sufficiently demonstrates compliance with policy DM30a (pre-2028) is possible. The applicant's Energy Statement does not, however, address water consumption (policy DM30b), how the development would meet the net zero requirements set out in policy DM30a if development did not commence until after 1 January 2028 and provide substantive evidence for the life cycle carbon assessment. Given the outline nature of the application, officers consider that these requirements can be appropriately secured by condition. This would require the submission and approval of a Sustainable Design Statement — including an Energy and Carbon Statement — prior to the commencement of development.
- 5.14 **Air Quality** NPPF section: 15 (Conserving and enhancing the natural environment); Strategic Policies and Land Allocations (SPLA) DPD policies: EN9 (Air Quality Management Areas); Development Management (DM) DPD policies: DM31 (Air quality management and Pollution) and DM57 (Health and Wellbeing)
- 5.14.1 Policy DM31 requires all development proposals to demonstrate that they have sought to minimise the levels of air polluting emissions generated and adequately protected their new users, and existing users from the effects of poor air quality. It goes on to state:
'Development which is located within an Air Quality Management Area (AQMA), or any development which has the potential to, individually or cumulatively, contribute to increasing levels of air pollution, will be required to demonstrate how either on-site or offsite mitigation measures will be put in place to reduce the air quality impact. Any proposal must not significantly worsen any emissions or air pollutants in areas where pollution levels are close to objective / limit value levels'.
- 5.14.2 The closest Air Quality Management Area relates to Lancaster City Centre. This is approximately 1.7km from the application site. An Air Quality Assessment supports the application and forms part of the ES. This has been undertaken in accordance with best practice guidance and regulation and sets out a clear methodology for assessing the significance of effects in the context of the EIA. The Air Quality chapter of the ES has not been updated to reflect the lower quantum of development now proposed, and therefore provides a worst-case scenario. The ES considered the effects arising from the construction and operation phases of development, with regard to future scenarios. Fundamentally this relates to the effects during construction activities and the impact arising from additional traffic flows once operational. The assessment considers the effects on nearby receptors as well as considering the potential effects on the AQMA. Exceedances of pollutants are only experienced (based on relatively old data) in certain locations around the city centre gyratory.
- 5.14.3 During construction and based on the ES assessment results, there is a major adverse risk of dust soiling and moderate adverse risk of human health impacts as a result of fugitive dust emissions associated with the construction of the development. With mitigation – in the form of a CEMP – the

effects are considered to reduce considerably to have a negligible effect. Whether the CEMP provides sufficient mitigation to reduce the effects to negligible effect is perhaps optimistic, but even if slight adverse effects are experienced, this is short-lived and temporary and would not lead to significant effects and a reason to withhold permission.

- 5.14.4 The effects on air quality once operational is directly linked to traffic, with dispersal modelling undertaken to information the level of impact. The assessment is thorough and demonstrated that predicted impacts on annual mean NO₂, PM₁₀ and PM_{2.5} concentrations were predicted to be negligible at all receptor locations (including nearby residential property and streets). As such, overall air quality effects associated with operational phase road vehicle exhaust emissions are predicted to be not significant.
- 5.14.5 The ES chapter has regard to the Councils' planning Advisory note in relation to the requirements for an Emissions Assessment and commits to provide this upon reserved matters when the final quantum of development is understood. The Emissions Assessment seeks to quantify a monetary value of the predicted emissions from the proposal, which have found to be not significant. This shall inform mitigation equivalent to the damage costs of key pollutants which can be secured by planning condition. Typical forms of mitigation would include the provision of EV charging points (now a matter dealt with by building regulations) and cost initiatives in Travel Plans (provision of bus passes, cycle vouchers etc).
- 5.14.6 The ES has sufficiently demonstrated there would be no significant adverse effects arising from the respective phases of development and having regard to the residual effects once mitigation is in place. The Councils' Environmental Protection Officer raises no objection on air quality grounds subject to the additional condition relating to the emissions assessment.

6.0 Overall Conclusion and Planning Balance

- 6.1 The Local Plan sets out the district's housing requirement at policy SP6. This sets a requirement of 10,440 new homes over the plan period (2011-2031) based on a stepped requirement from 400 dwellings per annum (2011/12-2018/19) up to 695 dwellings per annum (2029/30-2030/31). The Council's Housing Land Monitoring Report (HLMR) (July 2024) confirms only 214 net dwelling completions for the monitoring period (1 April 2023 to 31 March 2024). The HLMR concludes that as of the 1 April 2024 the outstanding commitment for the district stood at 2,662 dwellings (including student accommodation and older people accommodation). This demonstrates a significant shortfall in housing delivery in the district. This is reflected in the latest Housing Land Supply Statement which confirms the Council cannot demonstrate a five-years supply of housing sites and in fact is only able to demonstrate a 2 years' worth supply of housing. It has been acknowledged that the current supply position has been described as 'acute' and 'woeful' by Inspectors in recent appeals.
- 6.2 Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development. Footnote 8 of the NPPF which relates to paragraph 11(d) confirms that the lack of a five-year supply renders the policies most important for determining applications out-of-date. Limb 11(d) states where policies are out-of-date, planning permission should be granted unless the application of policies in NPPF that protect areas or assets of particular importance provides a strong reasons for refusing the proposed development; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination. The assessment above has confirmed there are or are no strong reasons for refusing the development and the presumption in favour must be engaged.
- 6.3 The development strategy for the District, as outlined in Policy SP3 of the Strategic Policies and Land Allocations Development Plan Document (SPLA DPD), promotes an urban-focused approach, directing growth towards the main urban centres of Lancaster, Morecambe, Heysham, and Carnforth. Whilst the proposed site lies within open countryside, it is immediately adjacent the existing built-up area of Morecambe and benefits from proximity to its services and facilities. The locational sustainability of the site is a significant benefit of the scheme, particular in an area where little housing growth has occurred or is planned.

- 6.4 However, the site is designated as Key Urban Landscape in the Local Plan, alongside a larger area to the north and northeast. Development of this site for up to 130 dwellings would conflict with the purpose of this designation, as described in Policies EN5 and DM46, particularly in terms of protecting the area's open character. As such, the proposal represents a departure from the Local Plan.
- 6.5 Consequently, the development of the site for housing will lead to moderate-slight adverse impacts on the landscape character and moderate adverse effects on visual amenity of the area, resulting in conflicts with policy DM46. Though, the level of effect is not significant in EIA terms with the greatest identified harm contained to the immediate site and its surroundings.
- 6.6 The scheme would result in harm to the significance of the Torrisholme Barrow Scheduled Monument due to development within its setting. However, this harm has been partially mitigated by the provision of structural landscaping and landscaping buffers to contain the built development. Whilst some level of harm remains, it is considered to be outweighed by the wider public benefits of the proposal—particularly the delivery of a significant number of homes in a sustainable location amid a recognised housing shortfall, therefore no resulting in a conflict with heritage policy.
- 6.7 It is recognised the development will result in minor conflict with policy DM44, in relation to the loss of Best and Most versatile agricultural land, however the losses are not significant.
- 6.8 The development will lead to a change in outlook and amenity to existing residents, though this is largely a consideration for reserved matters. The proposed parameters plan provides sufficient opportunity to ensure new development will not significantly adversely impact the amenity of future residents.
- 6.9 The proposed access strategy is deemed safe and suitable to the satisfaction of the local highway authority. The extent of off-site highway works will provide improvements to the walking and cycling environment locally and are considered a benefit to the scheme. The highways contribution will enable suitable mitigation to ensure the highway network can accommodate the growth associated with the development. These measures make the development acceptable in planning terms and provide wider public benefits. These benefits are given moderate weight in the planning balance.
- 6.10 The application has also demonstrated that the development would be acceptable in terms of flood risk, ecological impacts, sustainable design and infrastructure/pollution matters and it is recognised the development will also make positive contributions towards open space provision on and off-site. The open space contributions provide wider public benefits and are afforded moderate weight. The other matters hold neutral weight as they are matters required to make the development acceptable in planning terms. There are also social and economic benefits from the provision of employment and upskilling through the construction phases and the knock-on effect to the supply chain (securing short-term economic benefits), though these benefits are relatively small overall and therefore afforded limited weight
- 6.11 The proposed development will provide up to 130 dwellings with policy compliant affordable housing. As the presumption in favour of development applies, the housing benefits are given significant weight in the planning balance.
- 6.12 In the context of the presumption in favour of sustainable development, the assessment of this proposal against the NPPF taken as a whole, concludes there are no clear reasons for refusing the application which would effectively disengage the tilted balance. Therefore, in applying the titled balanced, the test is whether any adverse impacts arising from the development would significantly and demonstrably outweigh the benefits of the proposal. This is a matter of planning judgement.
- 6.13 In light of the assessment above together with the content of the submitted ES, given the significant undersupply of housing within the district, it is considered that the benefits of the proposal do outweigh the identified harm and permission ought to be granted.

Recommendation

That Outline Planning Permission **BE GRANTED** following the satisfactory completion of a Legal Agreement within 3 months of the date of this Committee meeting, and the condition listed below. In the event that a

satisfactory Section 106 Agreement is not concluded within the timescale above, or other agreed extension of time, delegate authority to the Chief Officer – Planning and Climate Change to refuse planning permission on the grounds that the obligations which make the development acceptable have not been legally secured and the following planning conditions:

The legal agreement shall secure:

- Provision of a policy-compliant (DM3 of the DM DPD) Affordable Housing (to be provided on site) in accordance with an Affordable Housing Scheme to be submitted with Reserved Matters and approved by the Council before the commencement of development.
- Provision of on-site Amenity Greenspace, Equipped Alay Area and Young Peoples Provision based on the Green and Blue Infrastructure Strategy and DAS.
- Off-site Public Open Space Contribution to be calculated at Reserved Matters Stage (in accordance with methodology in DM DPD or any successor document) towards athletics facilities, playing pitch improvements and associated facilities at Salt Ayre.
- Setting up of a Management Company; and
- Management and Maintenance of all landscaping, unadopted roads, lighting and drainage infrastructure and on-site open space.
- Provision of on-site Biodiversity Net Gain in accordance with an approved BNG Plan and Landscape and Ecological Creation and Management Plan.
- Highways Contribution
- Travel Plan Contribution

List of conditions:

Condition no.	Description	Type (indicative)
1	Timescale for submission of reserved matters application (2YRS)	Standard
2	Development in accordance with Approved Plans (Location plan, Parameters plan and Access Plan)	Standard
3	Reserved Matters to be based on the broad principles set out in the submitted Design and Access Statement and the Green and Blue Infrastructure Strategy.	Control
4	Phasing condition	Pre-Commencement
5	Final surface water sustainable drainage strategy	Pre-Commencement
6	Construction Surface Water Management Plan	Pre Commencement
7	Construction Environmental Management Plan	Pre Commencement
8	Construction Method Statement including construction working hours	Pre Commencement
9	Precise construction details of main vehicular site access and associated off site highway improvements including timetable for implementation.	Pre Commencement
10	Precise design and construction details of all other site access points (except main vehicular access) including active travel routes and emergency access.	Pre Commencement
11	Submission of a Sustainable Design Statement including Energy and Carbon Statement.	Pre Commencement
12	Employment and Skills Plan	Pre Commencement
13	Precise scheme for ecology mitigation based on submitted ecological appraisal and comments from GMEU.	Pre Commencement
14	Contaminated Land Assessments – further assessment as identified by the Phase II report and EHO comments.	Pre Commencement
15	Prior to any vibro-impact works on site, a risk assessment and method statement shall be submitted to the LPA and Network Rail.	Pre Commencement of any vibro-impact works.
16	Air Quality Mitigation Scheme in accordance with the ES.	Pre Commencement and concurrent with first reserved matters

17	Acoustic Design Statement setting out precise scheme for noise mitigation based on the recommendations of the Noise Assessment	Pre Commencement and concurrent with first reserved matters
18	Arboricultural Implications Assessment/ Tree Protection Plan	Pre Commencement and concurrent with first reserved matters
19	Scheme for M4(2) accessibility and adaptability dwellings	Pre-commencement concurrent with first reserved matters
20	Details of housing mix to accord with policy DM1	Pre Commencement and concurrent with first reserved matters
21	Construction details of the internal estate roads, private drives, footways and other active travel routes to be designed to the adoptable standards and LTN 1/20.	Prior to commencement of estate roads
22	Scheme for external lighting (street lighting and lighting of any open space)	Above Ground
23	Precise details of all play equipment, street furniture, signposting and interpretation boards.	Before the installation of play equipment/street furniture/sign posting/boards
24	Sustainable drainage system operation and maintenance manual.	Pre Occupation
25	Contaminated land verification report based on Site Investigation and unforeseen contamination.	Pre Occupation
26	Verification report of constructed sustainable drainage system.	Pre Occupation
27	Details of the homeowner packs	Pre Occupation
28	Travel Plan	Pre Occupation
29	In accordance with the specified mitigation set out in the approved Flood Risk Assessment.	Control
30	All new residential developments must achieve, as a minimum, the optional requirement set through the Building Regulations Requirement G2: Water Efficiency	Control
31	NDSS standards	Control
32	Provision of turning and parking	Control
33	Limit to maximum of 3 storey	Control
34	Protection of visibility splays	Control

Article 35, Town and Country Planning (Development Management Procedure) (England) Order 2015

In accordance with the above legislation, Lancaster City Council has made the recommendation in a positive and proactive way to foster the delivery of sustainable development, working proactively with the applicant to secure development that improves the economic, social and environmental conditions of the area. The recommendation has been made having had regard to the impact of development, and in particular to the relevant policies contained in the Development Plan, as presented in full in the officer report, and to all relevant material planning considerations, including the National Planning Policy Framework, National Planning Practice Guidance and relevant Supplementary Planning Documents/ Guidance

Background Papers

None