

Scotforth Rural Neighbourhood Development Plan

Lancaster City Council Response to Regulation 16 Consultation

October 2025

1. INTRODUCTION

- 1.1 Lancaster City Council (Council) welcomes the submission of the Scotforth Rural Neighbourhood Development Plan (referred to as 'the Plan' from this point forward) and recognises the significant amount of time, effort and work the local community has put into its production to date, taking a positive and proactive approach to plan-making. The council have been fully supportive of the Scotforth Rural Parish Council's (the Parish) decision to prepare a neighbourhood plan for their area and have provided support to aid the group's preparation of the plan.
- 1.2 Through dialogue with the Neighbourhood Plan Steering Group since the initial designation in January 2023, the Council have been aware of the wide variety of consultation events that have been held with the community. These events have helped identify issues which are important in the locality, gain consensus and draw conclusions to how such matters can be addressed.
- 1.3 This document forms the Councils response to the Regulation 16 consultation and is intended to support the Parish Council and the Independent examiner. For ease of reference, the comments set out in Section 4 of this response are according to the relevant sections of the Plan.

2. LEGAL REQUIREMENTS AND NATIONAL POLICY

Legal Requirements

- 2.1 When a qualifying body, in this case Scotforth Parish Council, submits a neighbourhood plan, the local authority is required to consider whether the legal process has been followed, whether the submission meets the requirements, to publicise the neighbourhood plan and arrange for independent examination.
- 2.2 The Scotforth Rural Neighbourhood Plan Area was designated on 27th January 2023 following the consultation process which was required at the time. The Parish Council has followed the required processes including pre-submission Regulation 14 consultation and publicity between 17th February to 31st March 2025.
- 2.3 The submission must include:
 - A map or statement identifying the area to which the plan relates;
 - The Neighbourhood Plan;
 - A Consultation Statement;
 - A Basic Conditions Statement (a statement on how the plan fulfils the basic conditions).

- 2.4 All the above documents have been submitted together with supporting evidence. The Consultation Statement and Basic Conditions Statement are considered to fulfil the requirements for their content.
- 2.5 The local authority is not required to assess whether the neighbourhood plan meets the basic conditions. That is the role of the independent examination. It is however expected to provide advice and support to help produce a plan that does meet the requirements. The basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) are as follows:
- (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.
 - (b) The making of the neighbourhood plan contributes to the achievement of sustainable development.
 - (c) The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
 - (d) The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.
 - (e) The prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal. The prescribed condition in relation to Plans is:
- 2.6 The making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017 (Habitat Regulation Assessment) in relation to the examination of neighbourhood development plans.

National Planning Policy

- 2.7 The National Planning Policy Framework (referred to as 'the NPPF' from this point forward) was published in December 2024. Changes have also been made to the Planning Practice Guidance (PPG) and further changes are expected in regard to both documents during the course of 2025.
- 2.8 The NPPF sets out the Government's planning policies for England and how these are expected to be applied. In doing so, it sets out the requirements for preparation of neighbourhood plans. All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area, align growth and infrastructure, enhance the environment, mitigate and adapt to climate change. Paragraph 30 of the NPPF states,
- 'Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies'.*
- 2.9 Within the overarching roles that the planning system ought to play, neighbourhood plans should also have regard to the core planning principles that underpin plan-making set out in paragraph 16 of the NPPF. The key principles highlight that plans should be prepared with the objective of contributing to the achievement of sustainable development; be positively prepared (in a way that is aspirational but deliverable); be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory

consultees; contain policies that are clearly written and unambiguous so it is evident how a decision maker should react to development proposals; be accessible through the use of digital tools to assist public involvement and policy presentations and serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area.

3. LANCASTER DISTRICT LOCAL PLAN

Current Local Plan Position

- 3.1 The Council adopted a Local Plan for Lancaster District in July 2020 (Local Plan). This was then the subject of an immediate Partial Review to ensure the plan better reflected the Council's objectives in respect of climate change. The Local Plan (climate emergency review) was adopted by the Council in January 2025.
- 3.2 The Local Plan consists of two key components, the **Strategic Policies and Land Allocations (Climate Emergency Review) DPD (SPLADPD)** which sets out a series of strategic policies which will guide future development, in terms of scale, location and growth. The DPD also contains a series of land allocations to identify where future growth needs will be met and land which has been protected for its environmental, social or economic value. The second part is the **Development Management (Climate Emergency Review) DPD (DMDPD)** which sets out a series of generic planning policies which are used by the Council to determine planning applications. The policies of the DPD are applicable to all development proposals across the entire district (unless the plan directs otherwise).
- 3.3 In 2023, following the withdrawal of funding for major infrastructure, it became unclear how some of the objectives of the 2020 Local Plan, including the delivery of strategic housing growth in South Lancaster, could no longer be viably achieved. The loss of such a strategic housing delivery site, coupled with a persistent under delivery of housing against the targets set in the plan triggered the need for a full and comprehensive review of the Local Plan. This full and comprehensive review includes revisiting issues around the scale and spatial distribution of development, what areas should be protected and how the key issues such as the Council's ambitions on action of the climate emergency can be addressed.
- 3.4 Work on this Full Local Plan Review is ongoing and is being prepared in the context of the new plan-making system. The Council issued a new Local Development Scheme (LDS) setting out the anticipated timetable for Local Plan production and is available on the [Council's website](#). Until the completion of the Local Plan Review the starting point for planning decisions remain the content and direction of the 2020 Lancaster District Local Plan and where appropriate, supplemented by the 2025 Partial Review.

Relevant Strategic Policies

- 3.5 Policy SP3 of the SPLADPD sets out the development strategy for Lancaster District. The policy aims to meet the development needs of the district by promoting an urban-focused approach towards development, supplemented with additional large development sites in greenfield locations. The development strategy is further supported by development in 'sustainable settlements' as defined by the hierarchy set out in Policy SP2 of the SPLADPD.

- 3.6 There are no settlements in the Scotforth Rural Parish which fall into the ‘sustainable settlement’ category with the communities of both Bailrigg and Lower Burrow not identified in the settlement hierarchy. This means that these settlements are not considered to be sustainable locations for future development and where development will only be supported for small-scale development where there is a clearly demonstrated and evidenced local need.
- 3.7 The neighbourhood plan area is situated to the south of Lancaster and much of the area designation falls with a ‘Broad Location for Growth’ as identified in Policy SG1 of the SPLADPD. The Local Plan identifies this location as an area to explore the delivery of a new settlement – Bailrigg Garden Village – as a strategic option to deliver future housing needs in the district. It was intended that opportunities for growth in this area would be addressed in more detail through the preparation of a bespoke Area Action Plan for South Lancaster.
- 3.8 Whilst work began on the Lancaster South Area Action Plan in 2022 the delivery of development in this area was predicated on the provision of critical highways and transport infrastructure which would open the area up to the wide highway network. This infrastructure was to be delivered by Lancashire County Council (as highways and transport authority) and funded through a successful bid to the Government’s Housing Infrastructure Fund (HIF). This bid secured in the region of £140 million to deliver highway and transport infrastructure in the South Lancaster area and facilitate the growth anticipated via the Local Plan.
- 3.9 However, through the course of 2022 and into 2023 the project suffered from the impacts of inflationary pressures, driving up project costs for the work. Whilst alternative options were investigated to bridge the growing financial gap around rising project costs, no realistic solution was found. It resulted in the HIF monies being returned to the Government and work on infrastructure improvement in South Lancaster being suspended.
- 3.10 As a consequence, this led to the City Council (as planning authority) ceasing work on the Area Action and triggering a Full Review of their Local Plan. The basis for the review was the loss of a key strategic housing delivery site and triggering the mechanisms for Review as set out in Policy LPRM1 of the SPLADPD.
- 3.11 The City Council are in the early stages of preparing that review, which will be undertaken via the new system of plan-making. Until such a time that the new Local Plan is in place, the content and direction for planning in the district remains the SPLADPD and DMDPD.
- 3.12 Therefore, the implications and direction of Policy SG1 in the SPLADPD still remains a starting point which still facilitates the opportunity for growth within the ‘Broad Location for Growth’.
- 3.13 In the context of this neighbourhood plan it is important to note the direction of Policy SG1 in regard to the provision of an area of separation. Point 6 of Policy SG1 states the following:

‘The creation of sufficient areas of high-quality open spaces to provide a distinct sense of place and deliver a network of green corridors and walking and cycling routes across the South Lancaster area to the benefit of the local environment and residents. The delivery of such spaces and routes should make for distinct areas of separation between the new development and the urban edge of Lancaster, Bailrigg Village and Galgate and give potential to bring forward a new country park.’

3.14 According, one of the key elements of this neighbourhood plan, specifically the delivery of an area of separation around the village of Bailrigg, is consistent with the direction of Policy SG1.

4. SCOTFORTH RURAL NEIGHBOURHOOD PLAN

4.1 This section sets out the comments which the Council have on the Plan. The Council recognise and welcome some amendments which have been made to the Plan in light of responses made at previous stages.

4.2 The Plan sets out a positive approach to development within the Parish given its context as a rural settlement. The Plan does not seek to curtail the sites allocated for development in the Local Plan, promotes housing development that meets identified needs and promotes infill sites, previously developed land and conversion.

Vision and Objectives

4.3 The City Council supports the vision and objectives of the Plan which are consistent with the spatial strategy for the district. The objectives promote conservation, protection and enhancement of the local landscape, biodiversity, good design, promote sustainable transport, and measures to reduce flood risk.

Policy SR1: Bailrigg Village Area of Separation and Development Boundary

4.4 The aims of the policy are supported and, as suggested in paragraphs 3.13 and 3.14 of this response, are considered to be in broad conformity with the adopted Local Plan.

4.5 The Council have previously had concerns with elements of the detail around the proposed Area of Separation, specifically the lack of clearly defined boundaries and the evidence which has been used to support the designation. The Council and the neighbourhood plan group have sought to engage in a positive and proactive manner to explore these concerns both prior to and following Regulation 14 consultation on the neighbourhood plan.

4.6 The City Council would support the principle of an 'Area of Separation' in this area which is consistent with the sentiment of Policy SG1 and accept that the *Landscape Character Assessment and Evidence Base to Define an Area of Separation in Scotforth* represents a sufficiently robust and evidential approach to define the boundaries to this designation.

4.7 The Council note that further additional photographic evidence has been supplied in the Plan at Appendix 2 which is welcomed and provides further contextual information for readers and users of the document.

4.8 Paragraph 4 of the Plan indicates that Appendix 2 of the Plan includes a discussion note explaining how development proposals have influenced the extent of the proposed areas. The discussion note provides useful context for the reasoning around how development proposals influence the definition of boundaries.

4.9 However, the Council would remain of the view that further detail could be drawn out of the evidential assessments to further strengthen the case for the designation and, in particular justification for the boundaries. This could be as simple as including some of the conclusions to this work within Appendix 2.

Policy SR2: Small Scale Development in Burrow Heights and Lower Burrow Local Character Area

- 4.10 As part of the consultation on the Regulation 14 version of the Plan a number of points of clarification were requested in relation to this policy, particularly in its presentation on the policy map and defining references in the policy itself, for instance the term ‘drumlin top’. These points of clarification have been addressed, and the City Council have no further comments to make on the content and direction of this policy.

Policy SR3: Landscape Character

- 4.11 The City Council have no further comments to make on the content and direction of this policy.

Policy SR4: Hedgerows, Trees and Woodland

- 4.12 The City Council support the purpose and rationale for this policy and the importance of seeking to retain natural features in new development where it is appropriate and reasonable to do so. The Council recognise that the value of natural features can bring to new development in terms of delivering high quality design and placemaking.
- 4.13 However, the City Council have concerns over the realism of the sentiments set out in the first paragraph of the policy. There are circumstances where it may not be possible to retain all hedgerows and trees – identified in the plan or otherwise. The City Council consider the wording to be overly onerous and unrealistic.
- 4.14 It is therefore recommended that the wording in the first paragraph of the policy be amended to encourage the retention and enhancement of all trees and hedgerows whilst acknowledging that there may be a need to deliver additional planting, replanting and replacements. These are matters which will need to be judged on a case-by-case basis when considering individual planning applications.

Policy SR5: Wildlife & Biodiversity

- 4.15 The City Council have no further comments to make on the content and direction of this policy.

Policy SR6: Responding to Local Character

- 4.16 The City Council have no further comments to make on the content and direction of this policy.

Policy SR7: Sustainable Design

- 4.17 The City Council have no further comments to make on the content and direction of this policy.

Policy SR8: Reducing Flood Risk and Improving Drainage

- 4.18 The City Council have no further comments to make on the content and direction of this policy.

Policy SR9: Walking, Cycling and Horse-Riding

- 4.19 Through the Regulation 14 process, the City Council raised concerns regarding the clarity of the mapping provided in Maps 5 and 6 of the Plan. These concerns related to the legibility of the map’s key and the routes which were highlighted on the maps.
- 4.20 Many of these concerns have been addressed in the finalised version of the plan, however an area of clarification still exist and should be addressed in the final version of the plan. On Map 5, the Parish Council (which is highlighted as a yellow line on the map) should be included on the map’s key for clarity.

Monitoring Framework

- 4.21 The inclusions of a monitoring framework in Section 11 is welcomed and the monitoring data identified supported in terms of how the policies will be measured.
- 4.22 However, the framework currently lacks information on who's responsibility it will be to monitor the plan (it will be the Parish Council to monitor the effectiveness of the Plan). There is also currently a lack of direction in the framework regarding when the Plan will be monitored. It is recommended that further wording be included to indicate the effectiveness of the plan will be monitored on an annual basis by the Parish Council. This would ensure that the Group are aware of the effectiveness of the policies with the opportunity for action should this be required.

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

- 4.23 SEA and HRA screenings were carried out on the Plan (in January 2025) prior to its submission. The HRA screening concluded that the Plan would not have an adverse effect on the integrity of designated sites either alone, or in combination with other plans and policies. The SEA screening concluded that the Plan is unlikely to result in significant environmental effects. The 3 statutory bodies have confirmed these conclusions.

Conclusion

- 4.24 The Council supports the policies in the Plan and consider that they are in conformity with national and local plan policies and meet the requirements of the basic conditions. Notwithstanding this, there are some issues in relation to clarity that the Council have highlighted for the Examiner and Steering Group's consideration.
- 4.25 Should the examiner require further information, evidence or discussion on any of the matters raised in the response the Council will be happy to assist in this matter.

From: Hannah Malyon <hannah.malyon@lancaster.gov.uk>
Sent: 17 November 2025 17:06
To: planningpolicy <planningpolicy@lancaster.gov.uk>
Cc: Dan Mitchell
Subject: Submission: Scotforth Neighbourhood Plan Ref 16 - Persimmon, L&Q, and Peel Land

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Dear Planning and Housing Strategy Team,

On behalf of Persimmon Homes, L&Q, and Peel Land, I attached our formal representation to the **Scotforth Rural Parish Neighbourhood Development Plan Regulation 16 Consultation**.

Also attached for ease of reference is our client's previous regulation 14 representation, submitted by Stantec UK Ltd, which should be read in conjunction with this Regulation 16 response.

Should you have any questions or queries concerning this response, please do get in touch.

Kind regards,
Hannah

Hannah Malyon MRTPI
Principal Planner



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Stantec UK Limited
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31 March 2025

Attention: Mr Derek Whiteway

Scotforth Parish Council

Dear Mr Whiteway,

Reference: Response to the Scotforth Rural Neighbourhood Development Plan – Regulation 14 Draft Plan Consultation

Introduction

Stantec is instructed to submit this representation to the above consultation on behalf of a consortium of developers and housebuilders comprising Peel Land, Persimmon Homes, Story Homes and L&Q Group (hereafter “the Consortium”). The Consortium has an interest in the emerging Scotforth Rural Neighbourhood Development Plan (hereafter “SRNDP”) as it controls land which forms part of the wider Lancaster South Broad Location for Growth, which lies partly within the Neighbourhood Plan Area.

As we go on to explain within this response, we have significant concerns that the emerging SRNDP conflicts with strategic policies established within the adopted development plan for Lancaster. We are also concerned that there is a lack of credible evidence to support the proposed policies contained within the emerging neighbourhood plan. As such, we are of the strong view that as currently drafted, the emerging SRNDP does not meet the ‘basic conditions’ for neighbourhood plans, which are set out within national planning guidance.

Relationship Between the Emerging Neighbourhood Plan and the Adopted Local Plan

As acknowledged within the consultation document, a significant proportion of Scotforth Parish – and indeed the Neighbourhood Plan Area – is located within an area of land which forms part of the ‘Lancaster South Broad Location for Growth’, which is allocated for much needed sustainable development within the adopted Local Plan for Lancaster District, Part One: Strategic Policies & Land Allocations Development Plan Document (hereafter “Local Plan Part One”). South Lancaster has been long identified as the most sustainable location for new housing development within Lancaster District.

Local Plan Part One Policy SG1 designates the Lancaster South Broad Location for Growth, including Bailrigg Garden Village, as a strategic location *for the development of at least 3,500 new houses, alongside employment and economic opportunities including the delivery of Lancaster University Health Innovation Campus and wider University related expansion*. The Broad Location was identified following a rigorous assessment process during the preparation of the adopted Local Plan. This needs to be fully reflected in the SRNDP

As the Parish Council will be aware, only a draft neighbourhood plan which meets a set of ‘basic conditions’ can be put to a referendum and be made. The basic conditions, as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004, include the requirements for the neighbourhood plan to be in *“general conformity with the strategic policies contained in the*

Reference: Response to the Scotforth Rural Neighbourhood Development Plan – Regulation 14 Draft Plan Consultation

development plan for the area" (i.e. the existing Local Plan) and for the document to *"contribute to the achievement of sustainable development"*.

In order that Lancaster District addresses its challenging housing needs, and to ensure that the sustainable growth of Lancaster University is not unnecessarily restricted, it is essential that Scotforth Parish Council pays full regard to Lancaster City Council's significant growth aspirations for South Lancaster, as set out within the adopted strategic policies contained within Local Plan Part One.

As currently drafted, the emerging SRNDP fails to recognise the significance of the scale of sustainable growth planned for the area. Whilst we note that the 'Draft Vision' set out within the consultation document states that *"Sympathetic large-scale development will be supported by significant enhancements in infrastructure to the area ... as proposed in the Local Plan for Lancaster District"*, we consider that the approach within the emerging SRNDP does not appropriately reflect the City Council's growth aspirations for the area.

Despite the City Council's decision to cease work on the preparation of the Lancaster South Area Action Plan (AAP) and decision to commence a review of the Local Plan, South Lancaster remains a Broad Location for Growth within the District's adopted Local Plan and as such, the area is expected to make an important contribution towards meeting the District's future housing needs. With this mind, to ensure that the emerging SRNPA is in *'general conformity'* with Local Plan Part One and *'contributes towards the achievement of sustainable development'*, the Parish Council should take a more positive and forward-looking approach about how best to accommodate the scale of development proposed in the area by the City Council.

It is important to recognise that the Government's Planning Practice Guidance ("PPG") states that neighbourhood plans should not be used as a mechanism *"to constrain the delivery of a strategic site allocated for development in the Local Plan"* (PPG paragraph 044 Reference ID: 41-044 20160519). As currently drafted, the general tone of the emerging SRNDP is to adopt a largely 'inward' facing, parochial approach, which attempts to restrict development within the parish boundary via the application of area of separation, landscape character area and design policies (which we go on to discuss further below).

In order to comply with the basic conditions, we are of the strong view that the emerging SRNDP should take a much more positive and aspirational tone in support of major sustainable development, thereby ensuring that the Parish Council is able to maximise the benefits arising from the significant scale of growth which is earmarked to place in the area, itself in a sustainable manner.

As a further point, in order to address the housing crisis and help drive economic and social growth, the Government is now asking the City Council to deliver even higher levels of new housing than is proposed in the adopted Local Plan, with a new standard methodology and planning reforms introduced in December 2024. Clearly, this creates significant challenges for the Council, which would be exacerbated if restrictions are sought on the delivery of sustainable development of scale in South Lancaster.

Bailrigg Area of Separation

Draft Objective 1 set out within the emerging SRNDP is *"to identify a suitable and sustainable Area of Separation around Bailrigg Village...."* In support of this objective, Draft Policy SR1 proposes the 'Bailrigg Village Area of Separation and Development Boundary', which is predicated upon maintaining openness between Bailrigg Village and the City of Lancaster to the north, as well as Bailrigg Village and Lancaster University campus to the south.

Reference: Response to the Scotforth Rural Neighbourhood Development Plan – Regulation 14 Draft Plan Consultation

The settlement of Bailrigg is located within the Lancaster South Broad Location for Growth, which remains a critical aspect of accommodating the District's residential and employment needs within the adopted Local Plan.

Notwithstanding that Key Growth Principle no.6 which forms part of Local Plan Part One Policy SG1, states that open spaces should provide distinct areas of separation between new development and Bailrigg Village, we have concerns as to how the extent of the proposed Bailrigg Village Area of Separation has been defined.

Having reviewed the '*Landscape Character Assessment and Evidence Base to define an Area of Separation in Scotforth*' report which has been produced in support of the emerging SRNDP, we note that existing landscape features/elements have been used to define the boundary for the 'area of separation'. In particular, overhead power lines which traverse east-to-west, to the north of Bailrigg Village have been used to define the proposed boundary. We are concerned that the application of an Area of Separation boundary using such physical features does not fully take account of the nuanced character of the area and is unlikely to be effective in achieving the desired aim for Bailrigg Village to remain distinct from planned new development as part of the Lancaster South Broad Location for Growth.

Instead, we suggest that careful screening and landscaping, through for instance, the introduction of new hedgerow and tree-lined boundaries as part of the masterplanning of new development at the Lancaster South Broad Location for Growth will be more effective in ensuring that Bailrigg Village remains a distinct area.

Burrow Heights and Lower Burrow

Emerging SRNDP Draft Objective 2 is "*to protect and enhance the area's distinctive rural landscape character and buildings, and in particular the small settlements of Burrow Heights and Lower Burrow.*" In support of this objective, Draft Policy SR2 proposes development restrictions within the 'Burrow Heights and Lower Burrow Local Character Area'.

In the context of the City Council's strategic planning policy for major development at the South Lancaster Broad Location of Growth, as set out within Local Plan Part One Policy SG1, we are concerned to note that SRNDP Draft Policy SR2 proposes that development within the area is limited to '*small scale infill and rounding off*' where an evidenced local need can be clearly demonstrated.

The scale of the District's significant housing needs is clearly set out within the adopted Local Plan, and its associated evidence base documents, including the Lancaster Strategic Housing Market Assessment. Burrow Heights and Lower Burrow form part the South Lancaster Broad Location of Growth, which, as explained above, has been identified as an area which is designated to accommodate a significant and crucial proportion of the District's housing needs. As such, we do not consider that SRNDP Draft Policy SR2 which proposes to restrict development at Burrow Heights and Lower Burrow, is in '*general conformity*' with the strategic policies set out within the adopted Local Plan.

Furthermore, we are concerned that SRNDP Draft Policy SR2 attempts to surreptitiously apply an 'area of separation' policy under the guise of protecting of the local landscape. As noted at paragraph 14 of the consultation document, an area of separation around Burrow Heights and Lower Burrow is not supported by policies contained in the adopted Local Plan.

To this effect, we note within the '*Identified Sites Landscape & Visual Assessment*' produced in support of District Local Plan (Arcadis, July 2018), the assessment for Bailrigg Garden Village – which includes Burrow Heights and Whinney Carr (located between the canal corridor to the west and the A6 and West Coast Main Line to the east) – concludes that "*development should be possible across this strategic site*

Reference: Response to the Scotforth Rural Neighbourhood Development Plan – Regulation 14 Draft Plan Consultation

with careful consideration for key views and the protection of key landscape features to ensure effects on landscape character and visual amenity are minimised as far as possible.” The 2018 assessment recommends that *“development within the strategic site should be laid out in smaller pockets separated by a network of green space, including agricultural land, and mitigation planting and screening measures.”*

We support the general approach set out within the City Council’s landscape evidence base and propose that careful site masterplanning, through for instance, mitigation planting and screening measures, and the introduction of landscape corridors will be effective methods in ensuring that the District’s challenging development needs can be accommodated in areas of the South Lancaster Broad Location of Growth, which are deemed to be of relatively higher landscape sensitivity, without compromising the City Council’s overall growth aspirations for the area.

Design

We note that the Consortium members are committed to the delivery of high quality and sustainable development in South Lancaster that reflects and respects the existing landscape and settlements. Consortium members are also committed to comprehensive public and stakeholder consultation on any proposals prior to the submission of any planning applications. Noting this, we have concerns regarding the SRNDP and its restrictive approach.

Draft Objective 3 set out within the emerging SRNDP is *“to promote sustainable designs in all new development....”*. In support of this objective, Draft Policy SR6 (‘Responding to Local Character’) proposes that the SRNDP applies the design principles and codes set out within the *‘Scotforth Neighbourhood Plan Design Guide and Codes’* (hereafter “SNPDGaC document”), which is appended to the consultation document. Draft Policy SR7 (‘Sustainable Design’) goes on to set out policies in relation to climate change and environmental sustainability, with reference to the aforementioned SNDGaC document.

As currently drafted, we are unclear as to what scale of development proposals that the SNDGaC document applies to. At page 28 of the consultation document, bullet point 2 under the ‘Justification’ heading of Draft Policy SR6 states: *“Much of the Parish is located in the Lancaster South Broad Location for Growth (Local Plan Part One Policy SG1) but SRNP policies on design have been prepared to guide proposals for small scale development (typically ones and twos) on infill sites and rounding off of existing settlements.”*

Despite the suggestion in the supporting text that the scope of design policies is limited to *‘small scale development’*, SRNDP Draft Policy SR7 makes reference to *‘major development’*. Whilst the SNDGaC document itself offers some clarity in explaining that *“Whilst this report focuses on design codes for small scale development within existing settlements, the parish council have recognised that design codes are also required for potential substantial developments envisaged in the Local Plan such as the Garden Village or large greenfield sites more generally. All design codes should conform to the following design principles, many of which were also proposed in the garden village masterplan.”*, it is evident that upon review of the requirements set out within the SNPDGaC document, the focus is on small scale development.

Given the Consortium’s interests, we do not have any specific comments to make in respect of the specific design principles and codes set out within the emerging SRNDP on the basis that the focus of the SNDGaC document is small-scale development. We wish to note that it would be inappropriate for the Parish Council to adopt the SNPDGaC document as a way which would limit the City Council’s development aspirations for the Lancaster South Broad Location for Growth – this would be contrary to national policy.

Reference: Response to the Scotforth Rural Neighbourhood Development Plan – Regulation 14 Draft Plan Consultation

For instance, we note the following requirement in relation to housing density on page 54 of the consultation document: *“The density of the settlements in the area is low, around 7 – 8 DpH. Any new development of higher density must be reflective of the existing built form and character of the area.”* Clearly, to ensure that Lancaster South Broad Location for Growth is capable of accommodating the circa. 3,500 new homes which are designated for delivery in the area, within the adopted Local Plan, the density figure for major new development will need to be significantly greater than ‘around 7 – 8 DpH’.

We reserve the right to make further comments in respect of design matters during future stages of the preparation of the emerging Local Plan, particularly should the Parish Council expand the scope of the draft design policies to specifically relate to the major development proposed within the Neighbourhood Plan Area.

Summary

Within this response to the Regulation 14 Draft Plan, Stantec has expressed significant concerns that the emerging SRNDP conflicts with strategic policies established within the adopted development plan for Lancaster – in conflict with national policy. We are concerned that the emerging neighbourhood plan fails to pay sufficient regard to the Lancaster South Broad Location for Growth, which is allocated for major sustainable development within the adopted Lancaster Local Plan Part One. As such, we consider that the emerging SRNDP does not meet the ‘basic conditions’, against which any emerging neighbourhood plan is required to be assessed.

We recommend that the Parish Council embraces the opportunity to fully and positively engage with the proposals for the Lancaster South Broad Location for Growth. This in contrast to its current approach which appears to attempt to restricts major development within the parish boundary via the application of area of separation, landscape character area and design policies.

We trust that these comments are helpful. We look forward to receiving confirmation of your receipt of this representation and we would be grateful if you could please keep us informed of the Parish Council’s progress as it moves forward with the emerging neighbourhood plan. Please do not hesitate to contact us if you require any further clarification regarding any of the points made in our response.

Yours sincerely

STANTEC UK LIMITED

Dan Mitchell
Planning Director

This matter is being dealt with by
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17th November 2025

SCOTFORTH RURAL NEIGHBOURHOOD DEVELOPMENT PLAN REGULATION 16 CONSULTATION

Submissions on behalf of Persimmon Homes, L&Q and Peel Land

1. We write in respect of the above public consultation, on behalf of Persimmon Homes, L&Q Group, and Peel Land (hereafter referred to as “the Consortium”).
2. In March 2025, the Consortium made submissions (via Stantec) to the Regulation 14 stage of the Scotforth Rural Neighbourhood Development Plan (SRNDP). Those submissions raised objections to the relationship between the Neighbourhood Plan and the adopted Lancaster City Council Local Plan, identifying the policy conflict in the Neighbourhood Plan versus Policy SG1 of the adopted Local Plan, and setting out that the ‘Basic Conditions’ test had not been met.
3. We do not repeat those objections here. Yet, it is important to note that Policy SG1 of the adopted Local Plan Part One designates the Lancaster South Broad Location for Growth as a strategic location for the development of at least 3,500 new houses, alongside employment and economic opportunities including the delivery of Lancaster University Health Innovation Campus and wider university-related expansion. This is a longstanding and strategic growth aspiration of the Council. It is perhaps the only area in Lancaster where new homes can support job growth, linked with the innovation and clustering around Lancaster University, also linked to the potential relocation of Lancaster Royal Infirmary to land at Bailrigg. We further note that this broad location for growth was identified following a rigorous Examination process during the preparation of the adopted Local Plan.
4. The SRNDP website lists a ‘Consultation Statement’ dated 7 July 2025 which includes a summary of objections made and response from the Neighbourhood Plan group. At Section 4 and paragraph 17, the Parish Council dismissed all arguments made by the Consortium, citing that the principle of Areas of Separation at Bailrigg is supported in the adopted Local Plan. The Parish Council is equally dismissive of comments from Gladman and the NHS Estates, on similar grounds. The SRNDP is largely unchanged in this regard and the Parish Council maintains its stance to introduce restrictive policies that it knows will impede the wider growth aspirations set out in the adopted Local Plan.
5. The Parish Council emphasise ‘Areas of Separation’ to be achieved in and around Bailrigg, and also stretching west across into the Burrow Heights area. There is no existing policy basis for this, and the principle is not supported in the SRNDP.

6. Policy SG1 of the adopted Local Plan identifies the wider growth area and cites some 15 key principles for development, which will be explored in more detail via a specific DPD (which has not yet been produced).
7. Similarly, the adopted Local Plan has a specific Policy for Areas of Separation at EN6. Policy EN6 specifically states that it is the Lancaster South Area Action Plan DPD that will define any Areas of Separation in and around Bailrigg.
8. The Parish Council is therefore incorrect in its assertion that the SRNDP policies add local detail to higher level strategic policies. Instead, the Parish Council is seeking to devise policies that it aims to use to restrict development in what is Lancaster's major growth area.
9. We attached the Consortium's previous representations which are still relevant in this regard and maintain our clients' objection to the SRNDP.
10. Lastly, we confirm our desire to remain informed over future decisions of the Neighbourhood Plan in accordance with Regulation 16 (iv) of the 2012 Regulations.

Yours faithfully,

Dan Mitchell
Partner

Marrons

Scotforth Rural Neighbourhood Plan Regulation 16 Consultation

Submitted By: Anonymous user

Submitted Time: October 3, 2025 10:20 AM

Creation Time: November 18, 2025 12:13 PM

Your Name

steve wallis

Organisation (if applicable)

Address

Email

Agent Details (if applicable)

Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make [the plan]

Do not agree

The making of [the plan] contributes to the achievement of sustainable development

Do not agree

The making of [the plan] is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)

Do not agree

The making of [the plan] does not breach, and is otherwise compatible with, EU obligations

Do not agree

Prescribed conditions are met in relation to [the plan] and prescribed matters have been complied with in connection with the proposal for [the plan]

Do not agree

2. Which part of the Neighbourhood Plan do your comments relate to?

Policy

3. To help the examiner consider your representation, please specify which part of the plan you are commenting on, using the page number, section, paragraph, policy or map. Put your comments below:

The plan for the development in general is objectionable on all counts. The plan describes the area as a rural landscape of natural habitat etc and then describes its destruction. It describes the aim to construct a happy place to live, but the happiness is based upon the rural natural habitat the development is built upon. This area is part of the Quernmore valley and its natural beauty. Lancaster is positioned such that its main attraction is the surrounding landscape and easy access. The plans will change Lancaster, the approach will be one of urban concrete sprawl. The local plan in general is flawed as it ignores the town centre potential, assuming the surround land is cheaper and easier re planning to build on. The planning fails to address the wildlife habitat loss simply because the current environmental impact surveys are not fit for purpose.

Would you like to be notified whether the plan proposal is made (adopted) by the Council

Yes

Scotforth Rural Neighbourhood Plan Regulation 16 Consultation

Submitted By: Anonymous user

Submitted Time: November 12, 2025 7:37 PM

Creation Time: November 18, 2025 12:13 PM

Your Name

Robert Wilson

Organisation (if applicable)

Address

Email

Agent Details (if applicable)

Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make [the plan]

Agree

The making of [the plan] contributes to the achievement of sustainable development

Agree

The making of [the plan] is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)

Agree

The making of [the plan] does not breach, and is otherwise compatible with, EU obligations

Agree

Prescribed conditions are met in relation to [the plan] and prescribed matters have been complied with in connection with the proposal for [the plan]

Agree

2. Which part of the Neighbourhood Plan do your comments relate to?

Policy

3. To help the examiner consider your representation, please specify which part of the plan you are commenting on, using the page number, section, paragraph, policy or map. Put your comments below:

Would you like to be notified whether the plan proposal is made (adopted) by the Council

Yes

Scotforth Rural Neighbourhood Plan Regulation 16 Consultation

Submitted By: Anonymous user

Submitted Time: November 12, 2025 8:13 PM

Creation Time: November 18, 2025 12:13 PM

Your Name

Becky Nyakale

Organisation (if applicable)

Address

Email

Agent Details (if applicable)

Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make [the plan]

Agree

The making of [the plan] contributes to the achievement of sustainable development

Agree

The making of [the plan] is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)

Agree

The making of [the plan] does not breach, and is otherwise compatible with, EU obligations

Agree

Prescribed conditions are met in relation to [the plan] and prescribed matters have been complied with in connection with the proposal for [the plan]

Agree

2. Which part of the Neighbourhood Plan do your comments relate to?

Policy, Chapter / Appendix, Paragraph

3. To help the examiner consider your representation, please specify which part of the plan you are commenting on, using the page number, section, paragraph, policy or map. Put your comments below:

Would you like to be notified whether the plan proposal is made (adopted) by the Council

No

Scotforth Rural Neighbourhood Plan Regulation 16 Consultation

Submitted By: Anonymous user

Submitted Time: November 15, 2025 2:04 PM

Creation Time: November 18, 2025 12:13 PM

Your Name

Rebecca Wilson

Organisation (if applicable)

Address

Email

Agent Details (if applicable)

Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make [the plan]

Agree

The making of [the plan] contributes to the achievement of sustainable development

Agree

The making of [the plan] is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)

Agree

The making of [the plan] does not breach, and is otherwise compatible with, EU obligations

Agree

Prescribed conditions are met in relation to [the plan] and prescribed matters have been complied with in connection with the proposal for [the plan]

Agree

2. Which part of the Neighbourhood Plan do your comments relate to?

Policy, Chapter / Appendix

3. To help the examiner consider your representation, please specify which part of the plan you are commenting on, using the page number, section, paragraph, policy or map. Put your comments below:

You live on the farm in the middle of this development, I think it is a great use of the space and the landscape

Would you like to be notified whether the plan proposal is made (adopted) by the Council

No

Scotforth Rural Neighbourhood Plan Regulation 16 Consultation

Submitted By: Anonymous user

Submitted Time: November 15, 2025 2:05 PM

Creation Time: November 18, 2025 12:13 PM

Your Name

Abbie Hall

Organisation (if applicable)

Address

Email

Agent Details (if applicable)

Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make [the plan]

Agree

The making of [the plan] contributes to the achievement of sustainable development

Agree

The making of [the plan] is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)

Agree

The making of [the plan] does not breach, and is otherwise compatible with, EU obligations

Agree

Prescribed conditions are met in relation to [the plan] and prescribed matters have been complied with in connection with the proposal for [the plan]

Agree

2. Which part of the Neighbourhood Plan do your comments relate to?

Policy, Chapter / Appendix, Paragraph

3. To help the examiner consider your representation, please specify which part of the plan you are commenting on, using the page number, section, paragraph, policy or map. Put your comments below:

I think it would be a great opportunity for the area and to help bio diversity.

Would you like to be notified whether the plan proposal is made (adopted) by the Council

Yes

Scotforth Rural Neighbourhood Plan Regulation 16 Consultation

Submitted By: Anonymous user

Submitted Time: November 15, 2025 2:08 PM

Creation Time: November 18, 2025 12:13 PM

Your Name

Josh

Organisation (if applicable)

Address

Email

Agent Details (if applicable)

Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make [the plan]

Agree

The making of [the plan] contributes to the achievement of sustainable development

Agree

The making of [the plan] is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)

Agree

The making of [the plan] does not breach, and is otherwise compatible with, EU obligations

Agree

Prescribed conditions are met in relation to [the plan] and prescribed matters have been complied with in connection with the proposal for [the plan]

Agree

2. Which part of the Neighbourhood Plan do your comments relate to?

Policy, Chapter / Appendix, Paragraph

3. To help the examiner consider your representation, please specify which part of the plan you are commenting on, using the page number, section, paragraph, policy or map. Put your comments below:

I think that these plans would be great for the local area.

Would you like to be notified whether the plan proposal is made (adopted) by the Council

No

Scotforth Rural Neighbourhood Plan Regulation 16 Consultation

Submitted By: Anonymous user

Submitted Time: November 15, 2025 11:44 PM

Creation Time: November 18, 2025 12:13 PM

Your Name

Philip Withnall

Organisation (if applicable)

Address

Email

Agent Details (if applicable)

Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make [the plan]

Agree

The making of [the plan] contributes to the achievement of sustainable development

Agree

The making of [the plan] is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)

Agree

The making of [the plan] does not breach, and is otherwise compatible with, EU obligations

Agree

Prescribed conditions are met in relation to [the plan] and prescribed matters have been complied with in connection with the proposal for [the plan]

Agree

2. Which part of the Neighbourhood Plan do your comments relate to?

Policy

3. To help the examiner consider your representation, please specify which part of the plan you are commenting on, using the page number, section, paragraph, policy or map. Put your comments below:

Draft policy SR4: the numbers for planting of new trees and hedgerows should be based on the numbers surviving to 3 years old, rather than the number initially planted. Too often, developers plant trees at the wrong time of year, or don't water them after planting, and they all die.

I am particularly pleased to see a plan for improving footpath connectivity (maps 5 and 6).

Would you like to be notified whether the plan proposal is made (adopted) by the Council

Yes