

North Lancashire

Response to Lancaster City Council's consultation on its
Local Development Plan Documents, September 2011

1) Comments on the Development Management DPD

Para 12.7

Renewable Energy Generation

The council will, in principle, encourage and support schemes that seek to generate energy from renewable sources. However, it must be demonstrated through the application process that such schemes do not result in a significantly detrimental impact on the local environment, residents and infrastructure.

Question: Should the council seek to allocate 'Areas of Search' within the Land Allocations DPD to identify areas suitable for renewable energy generation, or provide a criteria based policy which can be used on a case-by-case basis?

OUR RESPONSE

Ideally the Council should do both of these things. It would be helpful to list some criteria and also to indicate specific geographical areas which are likely to meet these criteria. This will provide some reassurance to advocates and consumers of renewable energy that the criteria are not overly restrictive and that the Council does genuinely seek to encourage and support renewable energy schemes.

We note that the para 12.5 mentions that the development of windfarms and wind turbines can have implications on residential amenity, landscape and natural environment as a whole. This may be true, but such impacts must be weighed against the much more significant and long-term local and global impacts of climate change if opportunities are not taken to substantially reduce greenhouse gas emissions through developing low-carbon forms of energy.

We further note that there is no mention in this document of the implications of nuclear power on residential amenity, landscape and natural environment as a whole. It should not be implied that wind turbines are more problematic from a planning and environmental point of view than nuclear power.

Para 12.9

It is not anticipated that there will be any standard for the delivery of micro-generation (i.e. The Merton Rule approach), the installation of micro-generation will be assessed on a case-by-case basis and the requirements dependent on the scale and location of development. The council feel that its primary target should be the improvement in energy efficiency of both new and old development via the potential creation of low carbon standards and the promotion of the Code for Sustainable Homes.

Micro-renewable Energy

The creation of energy efficient buildings and the use of micro-renewable energy generation will be supported by the council in appropriate locations.

Question: Should the council seek to identify targets for renewable energy generation over the plan period? Both for micro generation and for large scale commercial generation?

OUR RESPONSE

Yes we believe that the Council should set targets both for micro- and large scale renewable energy generation. The targets should be set at a level which is consistent with achieving the Government targets of reducing greenhouse gas emissions by at least 26% by 2020 and at least 80% by 2050, compared to 1990 levels (Climate Change Act, 2008).

If we are to meet these targets, new developments must be designed and built in such a way as to reduce overall emissions rather than adding to them. New developments which add to emissions would therefore have to compensate by reducing emissions elsewhere (e.g. by insulating old housing stock). A district-wide Carbon Emissions Reductions Fund could be set up for developers to be required to pay into, according to their emissions (i.e. zero-carbon developments pay nothing; but carbon-intensive developments pay a lot).

The current policy (Merton Rule) that new developments should generate at least 10% of their energy requirements through on-site renewables was a good start, but future targets need to be higher. It would perhaps be most appropriate to have a range of targets which increase with the scale of the development (in a similar manner to the targets for provision of affordable housing). So for example, if any large greenfield sites are allocated for development, these should be expected to provide at least 80% of their energy requirements from on-site renewables.

Para 15.7

The council will in due course identify green infrastructure assets which should be highlighted within the Land Allocations DPD and accompanying proposals maps. This will ensure that such important and valued facilities are recognised and afforded appropriate protection from inappropriate development.

Question: Which types of green infrastructure asset do you feel should be shown within the Land Allocation DPD and accompanying Proposals Map?

OUR RESPONSE

Another respondent has already commented that “The 'Green Infrastructure' shown on the Proposals Map of the plan document should include all public open spaces, school grounds/playing fields, nature reserves, lakes, ponds, wetlands and woodlands plus public bridleways, cycleways and footpaths.”

We agree with these suggestions, but would also add allotments (mentioned in 15.20), and avenues of street trees (mentioned in 15.10).

Para 15.10

The council has put forward a definition of green infrastructure which is...

“Green infrastructure is the network of designed and natural vegetation found in our cities and towns. It includes public parks, recreational areas, residential gardens and street trees as well as innovative emerging new urban green technologies such as green roofs and green walls.”

Question: Do you agree with our definition of 'green infrastructure'?

OUR RESPONSE

Yes.

Para 18.5

The Development Management DPD will seek through the location of new development to assist in improving air quality. Lancaster District has three Air Quality Management Areas (AQMA's) which highlight areas of significant air pollution and set out measures to assist in the reduction of these pollution levels, these areas include Central Lancaster, Central Carnforth and Galgate.

Question: Given that climate change is something that should be considered in all policies within this document, is a specific policy on climate change really necessary?

OUR RESPONSE

Yes. It helps to draw attention to the importance of this issue, and to ensure that consideration of climate change is not hidden amongst other policy issues.

Para 21.16

All proposals will have to have due regard to appropriate car parking standards, which will be prepared to accompany the final version of this document. This supplementary information will provide local parking standards for the district for all types of development. All development proposals will have to make satisfactory arrangements for access, servicing and cycle/car parking.

OUR RESPONSE

It is important that car parking standards are maxima, and cycle parking standards are minima. Developments that are carefully designed to encourage a low intensity of car use, including car-free developments, and those incorporating car clubs or other schemes for shared use, should be actively encouraged. Developments built in the next few years should be fit for purpose over the next few decades, when climate change and the much higher cost and lower availability of oil (post-‘peak oil’) can be expected to significantly reduce car ownership and use.

Para 24.14

Question: Do you agree with the approach for negotiating affordable housing in the district?

OUR RESPONSE

Yes. We support the higher targets for affordable housing provision on a sliding scale depending on size and location of the development. However, we believe the Council could do more to provide affordable housing, particularly on land in public ownership (avoiding major greenfield sites, allotments and other socially and environmentally important areas), or by using Empty Dwelling Management Orders (EDMOs).

Para 24.33

Question: How can the planning system be better utilised to drive down fuel poverty and to deal with affordable warmth issues?

OUR RESPONSE

The key problem here is how to make the existing housing stock more energy efficient. The planning system is generally only able to intervene when planning applications are made. Is it already a standard condition for all planning applications relating to existing buildings that decent standards of energy efficiency must be met for the whole building? If not, this should be introduced and enforced.

The Council could also be more proactive at encouraging owners of inefficient buildings to upgrade their insulation, perhaps in partnership with local organizations such as LESS. Surveys using thermal imaging cameras could be undertaken on a street-by-street basis (prioritizing areas of deprivation and older housing where people are most likely to be living in fuel poverty), with results and recommendations (or better still, direct help with installing insulation) given to the occupants/owners of each building identified as falling below acceptable standards.

We are not generally in favour of demolishing old housing stock as it is usually possible to improve it by renovation and avoid the disruption to local communities that demolition entails.

Question: What can be done to tackle fuel poverty where it exists in the district's existing housing stock?

OUR RESPONSE

See our responses to paras 12.9 & 24.33.

In addition the Council could use new powers (Empty Dwelling Management Orders) to bring empty buildings back into use and to upgrade their energy efficiency at the same time.

We would also like to see solar panels or other microrenewables installed on all Council Houses. Council tenants could benefit from free electricity and/or hot water, while the Council would benefit financially from the Feed-in-Tariff for each kWh of renewable energy generated. This money could be reinvested in installing more renewable energy measures over time to create a revolving invest-to-save fund.

2) Comments on the Land allocations DPD

OUR RESPONSE

We object to the development of any greenfield sites given that there are still a large number of brownfield sites potentially available in the district.

The Spatial Planning Events which took place in Feb-March 2011 gave participants (including North Lancs Green Party members) an opportunity to get an overview of all the potential development sites in the district, and their potential capacities for accommodating new housing. The exercise demonstrated that it is theoretically possible to allocate all of the 'required' 6,000 new houses on brownfield sites. Whilst this exercise did not take full account of other land use needs or land availability during the plan period, it gave a strong indication that there is potential for much more development of brownfield sites before any greenfield sites are released for development. Indeed, if greenfield development is strongly restrained, developers will be more likely to concentrate on bringing brownfield land back into use. If given a choice, no doubt they would prefer the cheaper and simpler option of building on fields, rather than having to deal with the complications that brownfield sites often bring because of their previous or neighbouring uses.

We support sustainable, community-oriented development of the following strategic sites:

- Morecambe Central Area
- Luneside West (excluding ES7 - which should remain as woodland and public open space)
- Canal Corridor North (we would like to see a genuine mixed use development here, not one dominated by retail and car parking).
- Heysham Energy Coast (however, we believe the focus should be on renewable energy, and should not include a third nuclear power station).

We strongly oppose the development of the following strategic sites because they are edge-of-town greenfield sites:

- Whinney Carr (SHLAA 286)
- Bailrigg (SHLAA 285)
- Grab Lane (SHLAA 320)

We are primarily concerned about the loss of countryside and biodiversity, the impacts of the extra traffic generated by large edge-of-town developments, and

the impact that the release of these greenfield sites would have on undermining the development of brownfield sites.

In addition there are many other greenfield sites in Appendix 1 which we believe should be protected from development, including:

- SHLAA 311 (off Powder House Lane, Torrisholme)
- SHLAA 273 (Ambleside Road, Ridge)
- SHLAA 266 (Watery lane, Skerton)
- SHLAA 272 (Derwent Road, Lancaster)
- SHLAA 307 (Hammerton Hall)
- SHLAA 1227 (Arna Wood, Aldcliffe)
- SHLAA 284 (Aldcliffe Road)
- CFS14 (North of Aldcliffe Village)
- ES7 & SHLAA 960 (off New Quay Road, incl. Freeman's Wood)
- CFS17 & SHLAA 367 (Barton Road recreation fields)
- SHLAA 323 (Newlands Road, Lancaster)
- CFS 16 (Ashton Road, Lancaster)
- SHLAA 414 & SHLAA 382 (former Royal Albert hospital, Lancaster)
- SHLAA 380 & 1310 (Fenham Carr, Lancaster)
- CFS 15 (Deep Cutting, Ashton Road, Lancaster)
- SHLAA 355 (Heysham Moss Sidings)
- SHLAA 370 (Playing fields off Lordsome Road, Morecambe)
- SHLAA 281 (Kingsway, Heysham)
- ES15 (Slyne Road, Torrisholme)
- SHLAA 317 (Oxcliffe Road, Morecambe)
- CFS 18 (Windermere Road, Carnforth)
- SHLAA 213 & 202 (Brewer's Barn, Carnforth)

- SHLAA 357 (Keer Bridge, Carnforth)
- SHLAA 319 (Crag Bank, Carnforth)
- SHLAA 291 (Beaumont College grounds)
- CFS 20 (Low Road, Halton)
- BS 21 (Tewitfield Fisheries, Carnforth)

At this point we gave up after realizing there were still 50 pages of suggested sites to plough through (mostly rural ones). It would be much easier to engage with this consultation if the Council had filtered out sites which are clearly not suitable for development due to their unsustainable location, importance for biodiversity or public open space, or other criteria. Better to consult on a limited number of sites that the Council would genuinely consider for development.

Submitted by Emily Heath on behalf of North Lancashire Green Party. 7 Sept 2011.