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Local Plan Publication:

- **Strategic Policies and Land Allocation Development Plan Document (DPD)**
- **Development Management Development Plan Document (DPD)**

Guidance notes & response form

Please read these guidance notes before completing the response form

Introduction

Lancaster City Council has published the **Strategic Policies and Land Allocation Development Plan Document (DPD) and the Development Management DPD** for an eight week consultation before it is submitted to the Secretary of State for examination. The consultation period will run from **9 February 2018 to 5pm 6 April 2018**. Representations received after 5pm on Friday 6 April 2018 will not be accepted.

This is an opportunity for you to make representations on whether the DPDs are legally compliant (ie do they meet the relevant requirements of national planning legislation) and whether the DPDs are 'sound' (ie do they meet the relevant requirements of national planning policy).

Representations made will be considered alongside the DPDs once submitted as part of the examination by an independent Planning Inspector. The Inspector will determine whether the DPDs have been prepared in accordance with the Duty to Co-operate, legal and procedural requirements, and whether it is sound.

Please note: comments that have been received during previous consultation exercises will not be carried forward to the Publication Stage.

The purpose of these guidance notes is to assist you in filling in the representation forms (Part A & Part B) correctly, as this will help the Planning Inspector when considering your views on the DPD.

If you would like assistance in completing your representation or have any other questions about the two DPDs please contact:

Email: planningpolicy@lancaster.gov.uk

Tel: 01524 582383

Post: Regeneration and Planning, Planning and Housing Policy Team, Lancaster City Council, Lancaster Town Hall, PO Box 4, Lancaster, LA1 1PJ





Part A - Personal Details

Please note that it is not possible for anonymous representations to be considered. Representations will be published on the Council’s website and submitted to the Inspector. Address and contact details will be removed from published responses, however, your name and any other information you choose to provide in your comments (including any information which allows people to identify you) will be published.

The Council reserves the right not to publish or take into account any representations which it considers offensive or defamatory.

Please supply an email address if you have one as it will allow us to contact you electronically. Everyone who submits a representation will be added to the relevant consultation database (if not already included) so that we can keep you up to date with progress. If you do not wish to be contacted in this way please let us know.

If an agent or consultant has been engaged to act on your behalf please fill in both sets of details in full. Correspondence will be sent to the agent. If you are a landowner with an agent acting on your behalf, please ensure that your agent knows the site name and reference number that your site has been given.

Part B - Representation

Please specify which section of the Publication Local Plan your comments relate to, by choosing one of the following;

Part One: Strategic Policies & Land Allocations DPD

Part Two: Development Management DPD

Which part of the DPD are you responding to (please use one form per submission):

- Paragraph:** for a representation on wording or paragraph content
- Policy:** for a representation on the wording or inclusion or omission of a policy
- Other:** for example a map inset number, site reference or the wording or content of tables or appendices

Legal Compliance and Duty to Co-operate

You should consider the following before making a representation on legal compliance:

- The DPD should be included in the current Local Development Scheme (LDS) and the key stages should have been followed.
- The process of community involvement for the DPD in question should be in general accordance with the Statement of Community Involvement (SCI).
- The DPD should comply with the Town and Country Planning (Local Planning) (England) Regulations 2012 (the Regulations). On publication, the Local Planning Authority must publish the documents prescribed in the Regulations; making them available on its website and at its principal offices. It must also notify the Local Plan Consultation bodies (as set out in the Regulations) and any persons who have requested to be notified.
- The LPA must provide a Sustainability Appraisal Report. This should identify the process by which it has been carried out, baseline information used to inform the process and the outcomes of that process.

You should consider the following before making a comment on compliance with the Duty to Co-operate:

- The 2011 Localism Act introduced the ‘Duty to Co-operate’ and amends the Planning and Compulsory Purchase Act 2004. The Local Planning Authority is expected to have fulfilled the requirements set out in Section 110 of the Localism Act, including a requirement for LPAs to engage constructively, actively and on an ongoing basis to maximize the effectiveness of Local Plan preparation in the context of cross boundary matters.



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Soundness

Soundness is explained in National Planning Policy Framework (NPPF) paragraph 182. The Inspector has to be satisfied that the Local Plan is positively prepared, justified, effective and consistent with national policy.

More details and further guidance on what is meant by the term 'soundness' can be found below and at; www.planningportal.gov.uk

Positively prepared

This means that the Local Plan should be prepared based on a strategy that seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified

The Local Plan should be the most appropriate strategy when considered against reasonable alternatives, based on a proportionate, robust and credible evidence base.

Effective

The Local Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities, sound infrastructure delivery planning and no regulatory or national planning barriers. It should be flexible to changing circumstances.

Consistent with national policy

The Local Plan should be consistent with national policy. Departure "from national policy" must be clearly justified.

If you think the content part of the Local Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy? If so it does not need to be included?
- Is what you are concerned with covered by any other policies in the Local Plan on which you are seeking to make representations or in any other Plan?

- If the policy is not covered, how is the Local Plan unsound without the policy?
- If the Local Plan is unsound without the policy, what should the policy say?

It will be helpful if you also say precisely how you think the Local Plan should be modified.

Representations should cover succinctly all information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a further opportunity to make submissions based on the original representation made at Publication.

Where there are groups who share a common view on how they wish to see the Local Plan modified, it would be very helpful for that group to send a single representation that represents the view. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

All the formal representations received during this stage will be submitted to and considered by the appointed Independent Planning Inspector at the Public Examination on the DPDs. The process is likely to include public hearings. The Inspector will determine the most appropriate procedure to adopt to hear those who choose to participate at this stage. If you would like to appear and speak at the hearings, please state this and explain in the space provided why you consider it is necessary that you participate. Appearance at the hearings will be at the Inspector's discretion.

Representations can be sent:

- Via the Council's online consultation portal: <https://www.surveymonkey.co.uk/r/LPPublication>
- By completing a representation form which can be emailed to: planningpolicy@lancaster.gov.uk
- Or post to:
Regeneration and Planning, Planning and Housing Policy Team, Lancaster City Council, Lancaster Town Hall, Dalton Square, PO Box 4, Lancaster, LA1 1PJ.



Publication - Response Form

- **Strategic Policies and Land Allocation Development Plan Document (DPD)**
- **Development Management Development Plan Document (DPD)**

Responses are encouraged via the Council’s online consultation system available on the website: www.lancaster.gov.uk/planning-policy-consultations. However, this form can be returned electronically to planningpolicy@lancaster.gov.uk or in hard copy if necessary to: Regeneration and Planning Service Lancaster City Council PO Box 4, Town Hall Dalton Square Lancaster LA1 1QR

The Publication Period runs from **9 February 2018 to 5pm 6 April 2018**. Representations received after 5pm on 6 April 2018 will not be accepted.

This form has two parts:
Part A - Personal Details and Part B - Your comments

PLEASE USE A SEPARATE FORM FOR EACH POLICY, CHAPTER OR PARAGRAPH YOU WISH TO COMMENT ON.

PART A

1. Personal Details

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Nick"/>
Last Name	<input type="text" value="Horsley"/>
Organisation <i>(Where relevant)</i>	<input type="text" value="Mineral Products Association"/>
Address Line 1	<input type="text" value="Gillingham House"/>
Address Line 2	<input type="text" value="38-44 Gillingham Street"/>
Address Line 3	<input type="text" value="London"/>
Post Code	<input type="text" value="SW1V 1HU"/>
E-mail Address	<input type="text" value="nick.horsley@mineralproducts.org"/>
Telephone Number	<input type="text" value="07568 427720"/>

2. Agent’s Details (if applicable)

Title	<input type="text"/>
First Name Last	<input type="text"/>
Name	<input type="text"/>
Organisation	<input type="text"/>
Address Line 1	<input type="text"/>
Address Line 2	<input type="text"/>
Address Line 3	<input type="text"/>
Post Code	<input type="text"/>
E-mail Address	<input type="text"/>
Telephone Number	<input type="text"/>



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PART B

REPRESENTATION FORM

Please Note: You do not need to return this form if you have completed a response using any of the Council's online systems for this consultation. Duplicates will not be considered.

Before completing Part B, please tick the box to show you have read the guidance notes for Making a Representation.

PLEASE USE A SEPARATE FORM FOR EACH POLICY OR CHAPTER YOU WISH TO COMMENT ON.

1. Please specify which DPD your comments relate to by choosing ONE of the following:	
Strategic Policies & Land Allocation DPD OR	<input checked="" type="checkbox"/>
Development Management DPD	<input type="checkbox"/>

2. Which part of the DPD do your comments relate to?	
Policy	<input checked="" type="checkbox"/>
Chapter / Appendix	<input type="checkbox"/>
Paragraph	<input type="checkbox"/>

3. Do you consider the DPD to be legally compliant?	
Yes <input type="checkbox"/> No <input type="checkbox"/>	
(If you answered yes to this question go to Question 5)	

4. If you answered 'no' to question 3, please indicate which test of legal compliance your representation relates to by selecting the relevant options below:	
3.1 The DPD is not included in the Council's Local Development Scheme and the key stages have not been followed	<input type="checkbox"/>
3.2 The process of community engagement for the DPD is not in general accordance with the Council's Statements of Community involvement	<input type="checkbox"/>

Question 4 continued	
3.3 The DPD does not comply with the Town and Country Planning (Local Planning) (England) Regulations 2012	<input type="checkbox"/>
3.4 A Sustainability Appraisal Report has not been published and/or its baseline information and conclusions have not been used to inform the DPD	<input type="checkbox"/>
3.5 The DPD has not had regard to national planning policy	<input checked="" type="checkbox"/>
3.6 The Council has not followed the 'Duty to Co-operate' requirements set out in Section 110 of the Localism Act 2011	<input type="checkbox"/>

5. Do you consider the DPD to be sound?	
Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
(If you answered yes to this question go to Question 7)	

6. If you answered 'no' to question 5, please indicate below on the ground(s) on which you consider the DPD to be unsound:	
5.1 The DPD is not positively prepared	<input type="checkbox"/>
5.2 The DPD is not justified	<input type="checkbox"/>
5.3 The DPD is not effective	<input type="checkbox"/>
5.4 The DPD is not consistent with national policy	<input checked="" type="checkbox"/>



7. Please explain why you consider the DPD is or is not legally compliant, unsound or fails to comply with the duty to co-operate.

Please reference paragraph numbers and be as precise as possible

Paragraph number 16.4-16.11

Policy / site number Policy SG11 :Land at Lundsfield Quarry

Comments: It is extremely disappointing that the Council has given no consideration to the representations made in 2017 and wholly disregarded national policy. As the name of this site would suggest, this site is the location of Lundsfield Quarry. This site was mothballed some years ago and whilst other activities have occurred on the site, including the production of concrete products, sand and gravel reserves remain unworked and for many years formed part of Lancashire’s landbank. It would be necessary for a mineral operator to undertake an environmental impact assessment before any works could recommence, however, it is acknowledged that Sand and Gravel resources in Lancashire are depleted. Policies DM1 and M2 of the Lancashire Minerals Local Plan detail the Spatial Vision for the protection of Minerals Safeguarding Areas and the County Council’s policy states that inappropriate development within Minerals Safeguarding Areas will not be supported. The proposed access directly on to Back Lane could prejudice the use of this lane by heavy goods vehicles accessing and egressing Back Lane Quarry and its link to the M6 Quarry link road. This link road was built specifically to ensure quarry traffic and local traffic through Carnforth do not conflict. The provision of an access directly on to Back Lane would undermine the objectives of this. Back Lane Quarry produces over a million tonnes of limestone aggregates, asphalt and concrete products every year. The products are critically important particularly to the north-west region and not just locally, as they are essential for the repair, maintenance and improvement of North West infrastructure not only in Lancashire, but in neighbouring Counties, including the essential maintenance of the M6 motorway. These activities are carried out on a 24/7 basis. Policy SG11 also conflicts with National Policy in the NPPF paragraph 143 which seeks to ensure that known locations of specific minerals resources and infrastructure are not needlessly sterilised by non-mineral development. These safeguarding requirements also apply to existing quarry plant and infrastructure which may be sterilised by the proximity of proposed conflicting development. The Sustainability Appraisal (SA) recognizes the need to take in to consideration minerals issues likely to be affected, yet neither the plan, or the SA have given due consideration to the baseline indicators of safeguarding minerals. The SA also suggests that protecting mineral resources for the use of future generations would discourage the use of recycling of construction materials, which is nonsensical and not supported by evidence. Safeguarding mineral resources is sustainable practice and accords with National policy. Further, the negative issues associated with the policy proposals within the SA makes no reference to minerals safeguarding. Policy SG11 is therefore unsound in that it conflicts with local and national policy. Further, the City Council has failed in its responsibility to show the Mineral Safeguarding Areas on the site-specific Policy maps. Policy SG11 conflicts with National Green Belt Policy and is contrary to the findings of the 2016 Green Belt Review.

(Please continue on a separate sheet if necessary)



8. Please set out what modification(s) you consider necessary to resolve your objection and make the DPD legally compliant or sound, having regard to the matter(s) you have identified above. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Deletion of the Policy will ensure the plan is sound in terms of the requirements the National Planning Policy Framework as it applies to minerals safeguarding, the safeguarding of minerals infrastructure and Green Belt.

Continue onto a separate page if required

9. If your representation is seeking a modification, do you wish to participate at the oral part of the Examination?

Yes, I wish to participate at the oral examination <input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination <input type="checkbox"/>
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10. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary.

As Lancaster City Council is not the Mineral Planning Authority, it may assist the Council in the understanding of national policy as it applies to minerals.

Continue onto a separate page if required

Please note that the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

11. Representations made may be accompanied by a request to be notified at a specified address that the DPD has been submitted to the Secretary of State for independent examination, and/or of the publication of the recommendations of the planning inspector who is to carry out the independent examination of the DPD, and/or of the adoption of the DPD. Please tick the box if you wish to be notified.

We would like to add your email address to our planning policy consultation database so that we can keep you up to date with progress and other planning policy issues. Please indicate tick the box if you consent to being added to the database?

Signed: 	Dated: 5 th April 2018
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**Thank you for your representation. Please return by 5pm on 6 April 2018.
Late representations will not be accepted.**



REPRESENTATION FORM

Please Note: You do not need to return this form if you have completed a response using any of the Council’s online systems for this consultation. Duplicates will not be considered.

Before completing Part B, please tick the box to show you have read the guidance notes for Making a Representation.

PLEASE USE A SEPARATE FORM FOR EACH POLICY OR CHAPTER YOU WISH TO COMMENT ON.

1. Please specify which DPD your comments relate to by choosing ONE of the following:	
Strategic Policies & Land Allocation DPD OR	<input checked="" type="checkbox"/>
Development Management DPD	<input type="checkbox"/>

2. Which part of the DPD do your comments relate to?	
Policy	<input checked="" type="checkbox"/>
Chapter / Appendix	<input type="checkbox"/>
Paragraph	<input type="checkbox"/>

3. Do you consider the DPD to be legally compliant?	
Yes <input type="checkbox"/>	No <input type="checkbox"/>
(If you answered yes to this question go to Question 5)	

4. If you answered ‘no’ to question 3, please indicate which test of legal compliance your representation relates to by selecting the relevant options below:	
3.1 The DPD is not included in the Council’s Local Development Scheme and the key stages have not been followed	<input type="checkbox"/>
3.2 The process of community engagement for the DPD is not in general accordance with the Council’s Statements of Community involvement	<input type="checkbox"/>

Question 4 continued	
3.3 The DPD does not comply with the Town and Country Planning (Local Planning) (England) Regulations 2012	<input type="checkbox"/>
3.4 A Sustainability Appraisal Report has not been published and/or its baseline information and conclusions have not been used to inform the DPD	<input type="checkbox"/>
3.5 The DPD has not had regard to national planning policy	<input checked="" type="checkbox"/>
3.6 The Council has not followed the ‘Duty to Co-operate’ requirements set out in Section 110 of the Localism Act 2011	<input type="checkbox"/>

5. Do you consider the DPD to be sound?	
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(If you answered yes to this question go to Question 7)	

6. If you answered ‘no’ to question 5, please indicate below on the ground(s) on which you consider the DPD to be unsound:	
5.1 The DPD is not positively prepared	<input type="checkbox"/>
5.2 The DPD is not justified	<input type="checkbox"/>
5.3 The DPD is not effective	<input type="checkbox"/>
5.4 The DPD is not consistent with national policy	<input checked="" type="checkbox"/>



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7. Please explain why you consider the DPD is or is not legally compliant, unsound or fails to comply with the duty to co-operate.

Please reference paragraph numbers and be as precise as possible

Paragraph number 16.12 - 16.20

Policy / site number Policy SG12 Land South of Windermere Road, South Carnforth

Comments: This site would appear to impact upon known and proven mineral resources associated with Lundsfield Quarry. The resources are clearly identified on the BGS resource map for Lancashire and on the Lancashire County Council adopted Minerals Safeguarding Map. It is acknowledged that Sand and Gravel resources in Lancashire are depleted. Policies DM1 and M2 of the Lancashire Minerals Local Plan detail the Spatial Vision for the protection of Minerals Safeguarding Areas and the County Council's policy states that inappropriate development within Minerals Safeguarding Areas will not be supported. Further, the proposed access directly on to Back Lane could prejudice the use of this lane by heavy goods vehicles accessing and egressing Back Lane Quarry and its link to the M6 Quarry link road. This link road was built specifically to ensure quarry traffic and local traffic through Carnforth do not conflict. The provision of an access directly on to Back Lane would undermine the objectives of this. Back Lane Quarry produces over a million tonnes of limestone aggregates, asphalt and concrete products every year. The products are critically important particularly to the north-west region and not just locally, as they are essential for the repair, maintenance and improvement of North West infrastructure not only in Lancashire, but in neighbouring Counties, including the essential maintenance of the M6 motorway. These activities are carried out on a 24/7 basis. Policy SG12 would bring housing closer to a minerals extraction site of significant regional importance. With Back Lane Quarry having consent to operate until 2048 and with the realistic option that further limestone resources would be released in the future through subsequent planning permissions for deepening or lateral extensions to the site, bringing housing closer to the operations on an adopted Mineral Safeguarding Area is clearly inappropriate. Policy SG12 conflicts with National Policy in the NPPF paragraph 143 which seeks to ensure that known locations of specific minerals resources and infrastructure are not needlessly sterilised by non-mineral development. These safeguarding requirements also apply to existing quarry plant and infrastructure which may be sterilised by the proximity of proposed conflicting development. The Sustainability Appraisal (SA) recognizes the need to take in to consideration minerals issues likely to be affected, yet neither the plan, or the SA have given due consideration to the baseline indicators of safeguarding minerals. The SA also suggests that protecting mineral resources for the use of future generations would discourage the use of recycling of construction materials, which is nonsensical and not supported by evidence. Safeguarding mineral resources is sustainable practice and accords with National policy. Further, the negative issues associated with the policy proposals within the SA makes no reference to minerals safeguarding. Policy SG12 is therefore unsound in that it conflicts with local and national policy. Further, the city council has failed in its responsibility to show the Mineral Safeguarding Areas on its site-specific Policy maps. Policy SG12 also conflicts with National Green Belt Policy and is contrary to the findings of the 2016 Green Belt Review.

(Please continue on a separate sheet if necessary)



8. Please set out what modification(s) you consider necessary to resolve your objection and make the DPD legally compliant or sound, having regard to the matter(s) you have identified above. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Deletion of the site will ensure the plan is sound in terms of the requirements the National Planning Policy Framework as it applies to minerals safeguarding, the safeguarding of minerals infrastructure and Green Belt.

Continue onto a separate page if required

9. If your representation is seeking a modification, do you wish to participate at the oral part of the Examination?

Yes, I wish to participate at the oral examination <input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination <input type="checkbox"/>
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10. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary.

As Lancaster City Council is not the Mineral Planning Authority, it may assist the Council in the understanding of national policy as it applies to minerals.

Continue onto a separate page if required

Please note that the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

11. Representations made may be accompanied by a request to be notified at a specified address that the DPD has been submitted to the Secretary of State for independent examination, and/or of the publication of the recommendations of the planning inspector who is to carry out the independent examination of the DPD, and/or of the adoption of the DPD. Please tick the box if you wish to be notified.

We would like to add your email address to our planning policy consultation database so that we can keep you up to date with progress and other planning policy issues. Please indicate tick the box if you consent to being added to the database?

Signed: 	Dated: 5 th April 2018
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Thank you for your representation. Please return by 5pm on 6 April 2018. Late representations will not be accepted.



REPRESENTATION FORM

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Before completing Part B, please tick the box to show you have read the guidance notes for Making a Representation.

PLEASE USE A SEPARATE FORM FOR EACH POLICY OR CHAPTER YOU WISH TO COMMENT ON.

1. Please specify which DPD your comments relate to by choosing ONE of the following:	
Strategic Policies & Land Allocation DPD OR	<input checked="" type="checkbox"/>
Development Management DPD	<input type="checkbox"/>

2. Which part of the DPD do your comments relate to?	
Policy	<input checked="" type="checkbox"/>
Chapter / Appendix	<input type="checkbox"/>
Paragraph	<input type="checkbox"/>

3. Do you consider the DPD to be legally compliant?	
Yes <input type="checkbox"/>	No <input type="checkbox"/>
(If you answered yes to this question go to Question 5)	

4. If you answered ‘no’ to question 3, please indicate which test of legal compliance your representation relates to by selecting the relevant options below:	
3.1 The DPD is not included in the Council’s Local Development Scheme and the key stages have not been followed	<input type="checkbox"/>
3.2 The process of community engagement for the DPD is not in general accordance with the Council’s Statements of Community involvement	<input type="checkbox"/>

Question 4 continued	
3.3 The DPD does not comply with the Town and Country Planning (Local Planning) (England) Regulations 2012	<input type="checkbox"/>
3.4 A Sustainability Appraisal Report has not been published and/or its baseline information and conclusions have not been used to inform the DPD	<input type="checkbox"/>
3.5 The DPD has not had regard to national planning policy	<input checked="" type="checkbox"/>
3.6 The Council has not followed the ‘Duty to Co-operate’ requirements set out in Section 110 of the Localism Act 2011	<input type="checkbox"/>

5. Do you consider the DPD to be sound?	
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(If you answered yes to this question go to Question 7)	

6. If you answered ‘no’ to question 5, please indicate below on the ground(s) on which you consider the DPD to be unsound:	
5.1 The DPD is not positively prepared	<input type="checkbox"/>
5.2 The DPD is not justified	<input type="checkbox"/>
5.3 The DPD is not effective	<input type="checkbox"/>
5.4 The DPD is not consistent with national policy	<input checked="" type="checkbox"/>



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7. Please explain why you consider the DPD is or is not legally compliant, unsound or fails to comply with the duty to co-operate.

Please reference paragraph numbers and be as precise as possible

Paragraph number 16.21 - 16.29

Policy / site number Policy SG13 Infrastructure Requirement & Delivery for Growth in South Carnforth

Comments: The proposed access directly on to Back Lane could prejudice the use of this lane by heavy goods vehicles accessing and egressing Back Lane Quarry and its link to the M6 Quarry link road. This link road was built specifically to ensure quarry traffic and local traffic through Carnforth do not conflict. The provision of an access directly on to Back Lane would undermine the objectives of this. Back Lane Quarry produces over a million tonnes of limestone aggregates, asphalt and concrete products every year. The products are critically important particularly to the north-west region and not just locally, as they are essential for the repair, maintenance and improvement of North West infrastructure not only in Lancashire, but in neighbouring Counties, including the essential maintenance of the M6 motorway. These activities are carried out on a 24/7 basis. The Sustainability Appraisal (SA) recognizes the need to take in to consideration minerals issues likely to be affected, yet neither the plan, or the SA have given due consideration to the baseline indicators of safeguarding minerals. The SA also suggests that protecting mineral resources for the use of future generations would discourage the use of recycling of construction materials, which is nonsensical and not supported by evidence. Safeguarding mineral resources is sustainable practice and accords with National policy. Further, the negative issues associated with the policy proposals within the SA makes no reference to minerals safeguarding. Policy SG13 is unsound because it is not consistent with national policy (Paragraph 143 of the NPPF). Policy SG13 also conflicts with National Green Belt Policy and is contrary to the findings of the 2016 Green Belt Review. Policy SG13 is therefore unsound in that it conflicts with local and national policy. Further, the city council has failed in its responsibility to show the Mineral Safeguarding Areas on its site-specific Policy maps.

(Please continue on a separate sheet if necessary)



8. Please set out what modification(s) you consider necessary to resolve your objection and make the DPD legally compliant or sound, having regard to the matter(s) you have identified above. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Deletion of the policy as it applies to South Carnforth will ensure the plan is sound in terms of the requirements the National Planning Policy Framework as it applies to minerals safeguarding, the safeguarding of minerals infrastructure and Green Belt.

Continue onto a separate page if required

9. If your representation is seeking a modification, do you wish to participate at the oral part of the Examination?

Yes, I wish to participate at the oral examination <input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination <input type="checkbox"/>
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10. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary.

As Lancaster City Council is not the Mineral Planning Authority, it may assist the Council in the understanding of national policy as it applies to minerals.

Continue onto a separate page if required

Please note that the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

11. Representations made may be accompanied by a request to be notified at a specified address that the DPD has been submitted to the Secretary of State for independent examination, and/or of the publication of the recommendations of the planning inspector who is to carry out the independent examination of the DPD, and/or of the adoption of the DPD. Please tick the box if you wish to be notified.

We would like to add your email address to our planning policy consultation database so that we can keep you up to date with progress and other planning policy issues. Please indicate tick the box if you consent to being added to the database?

Signed: 	Dated: 5 th April 2018
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**Thank you for your representation. Please return by 5pm on 6 April 2018.
Late representations will not be accepted.**



REPRESENTATION FORM

Please Note: You do not need to return this form if you have completed a response using any of the Council’s online systems for this consultation. Duplicates will not be considered.

Before completing Part B, please tick the box to show you have read the guidance notes for Making a Representation.

PLEASE USE A SEPARATE FORM FOR EACH POLICY OR CHAPTER YOU WISH TO COMMENT ON.

1. Please specify which DPD your comments relate to by choosing ONE of the following:	
Strategic Policies & Land Allocation DPD OR	<input checked="" type="checkbox"/>
Development Management DPD	<input type="checkbox"/>

2. Which part of the DPD do your comments relate to?	
Policy	<input checked="" type="checkbox"/>
Chapter / Appendix	<input type="checkbox"/>
Paragraph	<input type="checkbox"/>

3. Do you consider the DPD to be legally compliant?	
Yes <input type="checkbox"/>	No <input type="checkbox"/>
(If you answered yes to this question go to Question 5)	

4. If you answered ‘no’ to question 3, please indicate which test of legal compliance your representation relates to by selecting the relevant options below:	
3.1 The DPD is not included in the Council’s Local Development Scheme and the key stages have not been followed	<input type="checkbox"/>
3.2 The process of community engagement for the DPD is not in general accordance with the Council’s Statements of Community involvement	<input type="checkbox"/>

Question 4 continued	
3.3 The DPD does not comply with the Town and Country Planning (Local Planning) (England) Regulations 2012	<input type="checkbox"/>
3.4 A Sustainability Appraisal Report has not been published and/or its baseline information and conclusions have not been used to inform the DPD	<input type="checkbox"/>
3.5 The DPD has not had regard to national planning policy	<input checked="" type="checkbox"/>
3.6 The Council has not followed the ‘Duty to Co-operate’ requirements set out in Section 110 of the Localism Act 2011	<input type="checkbox"/>

5. Do you consider the DPD to be sound?	
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(If you answered yes to this question go to Question 7)	

6. If you answered ‘no’ to question 5, please indicate below on the ground(s) on which you consider the DPD to be unsound:	
5.1 The DPD is not positively prepared	<input type="checkbox"/>
5.2 The DPD is not justified	<input type="checkbox"/>
5.3 The DPD is not effective	<input type="checkbox"/>
5.4 The DPD is not consistent with national policy	<input checked="" type="checkbox"/>



7. Please explain why you consider the DPD is or is not legally compliant, unsound or fails to comply with the duty to co-operate.

Please reference paragraph numbers and be as precise as possible

Paragraph number 23.21

Policy / site number Policy SC5: Recreation Opportunity Areas

Comments: This Policy seeks the provision of recreational areas on land identified on the Lancashire County Council adopted Minerals Safeguarding Areas Map. This may or may not conflict with the principles of minerals safeguarding the mineral resource. However, Policy SC5 is reliant on built development facilitated under Policies SG11, SG12 and SG13 as it applies to South Carnforth. The Sustainability Appraisal (SA) recognizes the need to take in to consideration minerals issues likely to be affected, yet neither the plan, or the SA have given due consideration to the baseline indicators of safeguarding minerals. The SA also suggests that protecting mineral resources for the use of future generations would discourage the use of recycling of construction materials, which is nonsensical and not supported by evidence. Safeguarding mineral resources is sustainable practice and accords with National policy. Further, the negative issues associated with the policy proposals within the SA makes no reference to minerals safeguarding. Policy SC5 is therefore unsound in that it conflicts with local and national policy.

(Please continue on a separate sheet if necessary)



8. Please set out what modification(s) you consider necessary to resolve your objection and make the DPD legally compliant or sound, having regard to the matter(s) you have identified above. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Deletion of the reference to South Carnforth will ensure the plan is sound in terms of the requirements the National Planning Policy Framework as it applies to minerals safeguarding, the safeguarding of minerals infrastructure and Green Belt.

Continue onto a separate page if required

9. If your representation is seeking a modification, do you wish to participate at the oral part of the Examination?

Yes, I wish to participate at the oral examination <input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination <input type="checkbox"/>
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10. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary.

As Lancaster City Council is not the Mineral Planning Authority, it may assist the Council in the understanding of national policy as it applies to minerals.

Continue onto a separate page if required

Please note that the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

11. Representations made may be accompanied by a request to be notified at a specified address that the DPD has been submitted to the Secretary of State for independent examination, and/or of the publication of the recommendations of the planning inspector who is to carry out the independent examination of the DPD, and/or of the adoption of the DPD. Please tick the box if you wish to be notified.

We would like to add your email address to our planning policy consultation database so that we can keep you up to date with progress and other planning policy issues. Please indicate tick the box if you consent to being added to the database?

Signed: 	Dated: 5 th April 2018
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**Thank you for your representation. Please return by 5pm on 6 April 2018.
Late representations will not be accepted.**



REPRESENTATION FORM

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Development Management DPD	<input type="checkbox"/>

2. Which part of the DPD do your comments relate to?	
Policy	<input checked="" type="checkbox"/>
Chapter / Appendix	<input type="checkbox"/>
Paragraph	<input type="checkbox"/>

3. Do you consider the DPD to be legally compliant?	
Yes <input type="checkbox"/>	No <input type="checkbox"/>
(If you answered yes to this question go to Question 5)	

4. If you answered ‘no’ to question 3, please indicate which test of legal compliance your representation relates to by selecting the relevant options below:	
3.1 The DPD is not included in the Council’s Local Development Scheme and the key stages have not been followed	<input type="checkbox"/>
3.2 The process of community engagement for the DPD is not in general accordance with the Council’s Statements of Community involvement	<input type="checkbox"/>

Question 4 continued	
3.3 The DPD does not comply with the Town and Country Planning (Local Planning) (England) Regulations 2012	<input type="checkbox"/>
3.4 A Sustainability Appraisal Report has not been published and/or its baseline information and conclusions have not been used to inform the DPD	<input type="checkbox"/>
3.5 The DPD has not had regard to national planning policy	<input checked="" type="checkbox"/>
3.6 The Council has not followed the ‘Duty to Co-operate’ requirements set out in Section 110 of the Localism Act 2011	<input type="checkbox"/>

5. Do you consider the DPD to be sound?	
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(If you answered yes to this question go to Question 7)	

6. If you answered ‘no’ to question 5, please indicate below on the ground(s) on which you consider the DPD to be unsound:	
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5.2 The DPD is not justified	<input type="checkbox"/>
5.3 The DPD is not effective	<input type="checkbox"/>
5.4 The DPD is not consistent with national policy	<input checked="" type="checkbox"/>



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Please reference paragraph numbers and be as precise as possible

Paragraph number 20.1-20.3

Policy / site number H1 Housing in Urban Areas

Comments: Policy H1 is misleading in that it states that planning permission exists for housing within a Minerals Safeguarding Area as indicated in the allocated Lancashire Minerals Plan. Paragraph 16.6, the preamble to Policy SG11 states that this planning permission has now expired at Lundsfield Quarry. The Sustainability Appraisal (SA) recognizes the need to take in to consideration minerals issues likely to be affected, yet neither the plan, or the SA have given due consideration to the baseline indicators of safeguarding minerals. The SA also suggests that protecting mineral resources for the use of future generations would discourage the use of recycling of construction materials, which is nonsensical and not supported by evidence. Safeguarding mineral resources is sustainable practice and accords with National policy. Further, the negative issues associated with the policy proposals within the SA makes no reference to minerals safeguarding. Housing development on this land would conflict with local and national policy as it applies to Green Belt and Minerals Safeguarding.

(Please continue on a separate sheet if necessary)



8. Please set out what modification(s) you consider necessary to resolve your objection and make the DPD legally compliant or sound, having regard to the matter(s) you have identified above. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Deletion of the reference to Lundsfield Quarry will ensure the plan is sound in terms of the requirements the National Planning Policy Framework as it applies to minerals safeguarding, the safeguarding of minerals infrastructure and Green Belt.

Continue onto a separate page if required

9. If your representation is seeking a modification, do you wish to participate at the oral part of the Examination?

Yes, I wish to participate at the oral examination <input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination <input type="checkbox"/>
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As Lancaster City Council is not the Mineral Planning Authority, it may assist the Council in the understanding of national policy as it applies to minerals.

Continue onto a separate page if required

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Signed: 	Dated: 5th April 2018
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