



Shaping  
a better future



Shaping  
better development



Shaping  
a better economy



Shaping  
the urban future



Shaping  
a greener future



Shaping  
a sustainable future



Shaping  
the rural future

Representation Reference (Office Use Only)

## **LANCASTER DISTRICT LOCAL PLAN 2011 – 2026** **DEVELOPMENT MANAGEMENT DPD / MORECAMBE AREA ACTION PLAN** **PUBLICATION STAGE 2013 - WRITTEN REPRESENTATION FROM**

Any Written Representation Forms must be received by Lancaster City Council by 5pm on Thursday 21<sup>st</sup> November 2013.

Lancaster City Council is welcoming your comments on the Publication version of the Development Management DPD and the Morecambe Area Action Plan (AAP), which forms part of the emerging Lancaster District Local Plan 2011 – 2026. At this formal stage of preparing these documents we are only able to accept representations about whether the document is (a) legally compliant and (b) sound. Further information on how to complete this representation form can be found in the relevant Guidance note, further information can be found at the Council's website at [www.lancaster.gov.uk/planningpolicy](http://www.lancaster.gov.uk/planningpolicy).

There are a number of ways to make your representation(s), preferably representations should be made electronically via email to [planningpolicy@lancaster.gov.uk](mailto:planningpolicy@lancaster.gov.uk) or alternatively by post to the Planning and Housing Policy Team, Lancaster City Council, PO Box 4, Town Hall, Dalton Square, Lancaster, LA1 1QR.

This representation form consists of two parts, the first part (Part A) is where you must provide contact details and the second part (Part B) is where you make your representation. Please ensure that you fill in a separate Part B sheet for each individual representation you wish to make.

All parts of this representation form(s) must be completed where relevant. If you wish to submit documentation in support of your representation, the Council would appreciate receiving it in electronic format by email to the above address. Such information should be less than 5MB in size to allow it to be uploaded to the Council's website.

### **PART A: CONTACT DETAILS**

In circumstances where individuals / organisations / groups share a similar view, it would be helpful to the Planning Inspector to make a single joint representation stating clearly how many people the submission is representing and how the representation was authorised.

**QUESTION 1 and 2: PERSONAL / AGENT DETAILS** (if an agent has been appointed to represent you please only complete the Title, Name & Organisation parts of this question and complete the full contact details for your agent in Question 2).

	<b>1. PERSONAL DETAILS</b>	<b>2. AGENT DETAILS (if applicable)</b>
TITLE	Parish Clerk	
FIRST NAME	Robert	
LAST NAME	Bailey	
ORGANISATION (if Relevant)	Heaton-with-Oxcliffe Parish Council	
ADDRESS LINE 1	28 Wilson Grove	
ADDRESS LINE 2	Heysham	
TOWN	Morecambe	
POST CODE	LA3 2PQ	
TELEPHONE NUMBER	01524 858557	
EMAIL ADDRESS	clerk@heatonwithoxcliffepc.org.uk	

*We cannot accept anonymous responses. The Council will be required to make representations publically available so your personal details (excluding telephone numbers, email addresses and signatures) will be publically available at Lancaster and Morecambe Town Hall and on the Council's website. Your information will also be passed to the*

Planning Inspector who will use your details to contact you about the Public Examination. Email addresses (where provided) will be the preferred method of contact by the Inspector.

**PART B: WRITTEN REPRESENTATIONS**

Please state your name and/ or Organisation

Please answer questions 3 – 7 below and clearly explain your comments in the relevant sections. Please use one form per comment. Further sheets are available to download and you may use as many additional sheets as necessary.

**QUESTION 3A: WHICH DOCUMENT DOES YOUR REPRESENTATION RELATE TO?**

<u>DEVELOPMENT MANAGEMENT DPD</u>	<input type="checkbox"/>	<u>MORECAMBE AREA ACTION PLAN</u>	<input checked="" type="checkbox"/>
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**QUESTION 3B: TO WHICH PART OF THE DPD DOES THIS REPRESENTATION RELATE?**

<u>POLICY NUMBER</u>	<input type="text"/>	<u>PARAGRAPH NUMBER</u>	<u>2.39; 2.43 and others</u>
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**QUESTION 4: DO YOU CONSIDER THE DOCUMENT TO BE:**

Please only tick one box per Part B representation. For further information and explanation please use the 'Guide to Making a Representation' Note which is available at Council Offices or via the Council's website.

	YES	NO
LEGALLY COMPLIANT	<input type="checkbox"/>	<input type="checkbox"/>
SOUND	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The consideration in relation to the DPD /AAP being 'Sound' are explained in paragraph 182 of the National Planning Policy Framework and further information is provided within the Council's guidance note on how to make a representation.

If you have ticked 'No' to whether the DPD / AAP is 'Sound' then please continue to Question 5, in all other circumstance please go to Question 6.

**QUESTION 5: DO YOU CONSIDER THE DOCUMENT TO BE UNSOUND BECAUSE IT IS NOT:**

Please only tick one box per Part B representation. Explanation of the below terms can be found in the 'Guide to Making a Representation' Note.

POSITIVELY PREPARED	<input type="checkbox"/>
JUSTIFIED	<input checked="" type="checkbox"/>
EFFECTIVE	<input type="checkbox"/>
CONSISTENT WITH NATIONAL POLICY	<input type="checkbox"/>

**QUESTION 6: PLEASE GIVE DETAILS OF WHY YOU CONSIDER THE DOCUMENT IS NOT LEGALLY COMPLIANT OR IS UNSOUND. PLEASE BE AS CONCISE AND CLEAR AS POSSIBLE. IF YOU WISH TO SUPPORT THE LEGAL COMPLIANCE OR SOUNDNESS OF THE DOCUMENT PLEASE ALSO USE THIS BOX TO SET OUT YOUR COMMENTS.**

Given its location on the boundary of Morecambe, the Heaton –with-Oxcliffe Parish Council has taken great interest in the development of the MAAP and has commented on it at an earlier date. The Parish Council recognises that there is a great deal of merit in the Plan and that most of the proposals are logical and well-conceived. However, it now comments on the published version of MAAP in terms of its **soundness** in the manner in which it is **justified**. The Council questions whether, despite the Plan’s many merits, it is adequately evidenced in terms of the extrinsic factors which will affect it. The MAAP definitely does not show, with any degree of certainty, how the policies and proposals contained “ensure that the social, environmental , [and] economic objectives will be achieved” (as the *Guide to Making Representations* puts it).

Indeed, the MAAP says that they may not be achieved. Para 2.39 says “ *It might not work because wider market factors, national and international, may prove too adverse and too strong and so stymie what investment can be won.*” Para 6.2 says “*investment conditions are very poor and could well deteriorate further.*” Para 2.43 refers to the possibility that “*by 2012...the MAAP [may not have] worked*”. Topic Paper 3 argues that Morecambe is “*peripheral*” and “*not on the radar for most who make investment decisions.*” In this respect, the MAAP remains fundamentally no more than aspirational and cannot be assessed fully.

The Parish Council considers that the same aspirational tone occurs at several points in the Plan when a more fact-based approach would be desirable. For example, the MAAP correctly alludes frequently to the poor weather experienced by Morecambe as a negative factor in the Plan. Para 11.16 comments that it “*can too often through (sic) a veil over the seafront*”. It would be desirable for the Plan to be more evaluative and less metaphorical on this issue and to give some verified statistical information on projected changes in climatic conditions, if any, forecast for this part of the North West coast.

Similarly, at 11.13 the marketing plan for Morecambe is said to be that of promotion under a “Morecambe Bay branding” but no data is provided on how this would accord or challenge the marketing and development plans of other towns around the Morecambe Bay; para 12.17 contains brief but rhetorical statements about training and support for jobs that will be needed to support the Plan but no evidence of enquiry into data to demonstrate that capacity will exist in local institutions; para 12.18 writes thinly on monitoring and review of the Plan in coming years but no information on what this will be and how its outcomes will be operationalized.

**QUESTION 7: PLEASE SET OUT WHAT CHANGE(S) YOU CONSIDER NECESSARY TO MAKE THE DPD LEGALLY COMPLIANT OR SOUND, HAVING REGARD TO THE TESTS OF SOUNDNESS REFERRED TO IN QUESTION 5 OF THIS FORM WHERE THIS RELATES TO SOUNDNESS. YOU WILL NEED TO SAY WHY THIS CHANGE WILL MAKE THE DOCUMENT LEGALLY COMPLIANT OR SOUND. IT WILL BE HELPFUL IF YOU ARE ABLE TO PUT FORWARD YOUR SUGGESTED REVISED WORDING FOR ANY POLICY / TEXT. PLEASE BE AS CLEAR AND CONCISE AS POSSIBLE.**

*Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/ justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the Publication Stage. After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues they identify for Public Examination.*

The Parish Council submits that adequate supporting data with worked economic models and scenarios on national and international economic factors should be presented to accompany these ambitious plans which will incur considerable public expenditure. Without them a proper risk analysis is not possible.

Similar comments with regard to changes or extensions of the document apply to the other instances cited in this response. Further data on possibly competing marketing plans of other towns in the Morecambe Bay Area and on the capacity of local education and training institutions to meet the needs of the Plan would contribute to soundness. The wording of 12.'18 with regard to monitoring and review is unsound in its vagueness and should contain at least some further details of actions and dates for actions

**QUESTION 8: IF YOUR REPRESENTATION IS SEEKING A CHANGE, DO YOU CONSIDER IT NECESSARY TO PARTICIPATE AT THE ORAL PART OF THE PUBLIC EXAMINATION? Please tick one box only.**

<input checked="" type="checkbox"/>	<b>NO I do not wish to participate Orally at the Public Examination</b>	<input type="checkbox"/>	<b>YES I do wish to participate Orally at the Public Examination</b>
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**QUESTION 9: IF YOU WISH TO PARTICIPATE AT THE ORAL PART OF THE EXAMINATION, PLEASE OUTLINE WHY YOU CONSIDER THIS TO BE NECESSARY.**

*Please note 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.*

Not applicable

**SIGNATURE:**



**DATE:**

20 November 2013

<p><i>Please tick this box if you DO NOT wish to be notified when the Development Management DPD and Morecambe Area Action Plan are submitted, upon the publication of the Inspectors Report, when the document is formally adopted by the City Council or be involved in the preparation of future planning documents as part of the emerging Lancaster District Local Plan 2011 - 2026</i></p>	<input type="checkbox"/>
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Thank you for taking the time to complete this representation.  
Please keep a copy for your future reference.