Examination of the Lancaster District Strategic Policies and Land Allocations Development Plan Document and the Development Management DPD

Examination in Public Hearing Statement

Joint Hearing Statement prepared by Savills and Gladman Developments Limited
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Introduction

Savills act on behalf of Gladman Developments Limited (GDL) and the Bailrigg Farmland Trustees in respect of circa 39ha of land at Bailrigg Lane, Lancaster. The land is situated to the North of Lancaster University and to the South of Scotforth. The site is bound to the East by the M6 and to the West by open land, beyond which lies the A6. Access is currently gained via Bailrigg Lane and will shortly be available via the Science Park/Health Innovation Campus access road which is under construction and due to be completed in 2019. The Trustees have full rights of access and the ability to connect to all services through this new infrastructure. A plan identifying the land and access road is contained within Appendix 1.

The site has been identified for development in various Local Plan iterations since circa 2011.

Background and Chronology of Events

Savills have been involved with the land at Bailrigg since approximately January 2011 when the Council first undertook a call for sites exercise, all the way through to the current Examination process. Throughout this period we have worked closely with the Council and have submitted representations to every stage of the Plan making process. The land has been draft allocated for development throughout this period and we have always worked with the Council to seek to bring forward development as soon as possible.

Throughout this period a substantial evidence base has been amassed for this land. This has been prepared by consultants either acting for the Council as part of the Plan making process or acting for the landowners. In particular, in 2014 a very significant evidence base was commissioned by the Trustees to inform the Local Plan process which, at the time, we thought would be heading to Examination in the short term. This work covered all technical aspects including highways and transportation, drainage, ecology, noise, archaeology, heritage, flood risk, landscape and culminated in the production of a comprehensive masterplan for the site. This evidence demonstrated that the land was available, deliverable and viable and that there were no insurmountable challenges to bringing forward development.

The commencement of work on the Science Park/Health Innovation Campus access road represents a material change in circumstances for the delivery of this land for development. It is a significant piece of infrastructure in South Lancaster. The opening up of the land at Bailrigg has always been dependent on the delivery of this road and so commencement of work was welcome.

Therefore in 2018 the landowners selected Gladman Developments Limited as their delivery partner. We are currently refreshing the various strands of technical work based on more up to date survey information and to reflect best practice. This in turn will culminate in the production of a new masterplan to guide development in the future. We are looking to bring an outline planning application forward in the Summer of 2019 based on the long established master planning principles for the site.

We anticipate submitting a formal pre-application enquiry and formal EIA Scoping request in early April 2019.
1. Matter 1: Legal Compliance, procedural and general

Main Issue: have the DPDs been prepared in accordance with relevant legal requirements, including the Habitats Regulations, Duty to Co-operate, the procedural requirements of the National Planning Policy Framework, the Local Development Scheme and the Statement of Community Involvement?

Questions:

b) The Council refers in the Duty to Co-operate Statement to how co-operation with South Lakeland District Council informed the need to review the Greenbelt in relation to OAN methodology and calculation. Could the Council be more specific on this matter? How did the Council co-operate with adjoining authorities in respect of any unmet housing need?

1.1. The Duty to Cooperate (DtC) is a legal requirement established through Section 33(a) of the Planning and Compulsory Purchase Act 2004, as amended by section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities to address cross boundary strategic issues through the process of plan preparation.

1.2. The Planning Practice Guidance (PPG) provides guidance upon compliance with the DtC which makes clear that local planning authorities should explore all available options of delivering the planning strategy within their own area and should approach authorities with whom it would be sensible to seek to work together to deliver the planning strategy. This should be achieved through co-operation between local planning authorities, county councils and other public bodies to produce effective policies relating to strategic cross boundary matters.

1.3. Whilst there is no definitive list of actions that constitute effective cooperation under the duty, cooperation should produce effective policies relating to cross boundary matters. Local planning authorities and public bodies may enter into agreements on joint approaches, which involve joint evidence and strategies to define the scope of the Local Plan.

1.4. The Council must be able to demonstrate that it has worked constructively with neighbouring authorities to address any strategic cross boundary needs and that this work has produced effective outcomes. Whilst the Council’s DtC Statement of Compliance and response to the Inspector’s Initial Questions highlights what discussions have occurred through joint working, it is apparent that responses from the authorities within the Housing Market Area that there are no opportunities for delivery of the district’s housing needs in areas outside the local planning authority boundary. Indeed, Gladman note the Inspector’s Report to the Wyre Local Plan which highlights that requests where made from both authorities to meet each other’s unmet housing needs. In Wyre this resulted in the need for an early review of the Wyre Local Plan to ensure OAN is fully met over the plan period, Main Modification 2 states:

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1 PPG Reference ID: 9-003-20140306
2 PPG Reference ID: 9-010-20140306
“Following the hearing sessions in May 2018, the Council proposed modifications to the Local Plan which brought the local plan housing land supply closer to the identified housing OAN. However due to the outstanding shortfall and the existing position that no adjoining authority is able to assist Wyre in meeting unmet needs, the Local Plan includes a review mechanism in Policy LPR1 which commits the Council to an early partial review commencing in 2019 with submission of the review for examination by early 2022.”

1.5. Although the Plan will not be tested against the requirements of the Revised Framework, the NPPF (2019) sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SOCG), throughout the plan making process. It is therefore important that a strong review mechanism is included within the Local Plan to ensure the Council continues to work with its neighbouring authorities linked to monitoring of the Plan, to ensure cross boundary matters have been considered and to identify what actions are required to ensure issues are proactively dealt with i.e. unmet housing needs.

1.6. The Habitats Regulations Assessment Report identified likely impacts on the Morecambe Bay (and Duddon Estuary) SAC/SPA/Ramsar in relation to loss of Functionally-Linked Land (FLL) to the SPA/Ramsar and disturbance of birds on FLL, as well as impacts from recreational pressure on habitats and species both at Morecambe Bay and on FLL (bird species only).

1.7. The appointed Ecological Consultants for the Bailrigg Lane site, CSA, are currently compiling a ‘shadow Appropriate Assessment’ for the proposed development to provide Lancaster City Council, as competent authority, with additional information for their own assessment, as part of the determination of the forthcoming planning application. This will demonstrate:

- Wintering bird surveys, undertaken by CSA at the Site over winter 2018/19, did not identify any significant aggregations of qualifying species. The characteristics of the Site make it of low suitability for key species and it is therefore concluded that the Site does not form FLL to the Morecambe Bay, and no mitigation would be required.

- With regards to recreational impacts, the Bailrigg Lane Site is more distant than allocated sites at Heysham (SG14 and SG15), and the mitigation package set out by Lancaster City, involving resident’s packs and suitable on-site open space is likely to be effective in absorbing the majority of recreational pressure generated by new residents. The Site’s large size facilitates the provision of high-quality on-site open space. Appropriate mitigation can be secured by condition.
d) Are the DPDs in general conformity with the National Planning Policy Framework (NPPF)? Do they reflect the presumption in favour of sustainable development (in particular policies SP1 and SP2)?

1.8. In principle, Gladman support the inclusion of policies SP1 and SP2 which set out the Council’s approach to the presumption in favour of sustainable development and the settlement hierarchy respectively. This will ensure the Council will make local planning decisions based on the delivery of sustainable development and provides assurance of a local approach to improve the social, environmental and economic wellbeing of the area by distributing sustainable growth opportunities to most appropriate locations.

1.9. Notwithstanding this, Gladman are concerned that the DPDs as currently proposed are not seeking to meet the full objectively assessed needs for housing and Gladman therefore consider additional allocations are likely to be needed to ensure housing needs are met in full. Further details on this issue will be discussed in response to Matter 2.

g) Are appropriate arrangements in place to ensure proper monitoring of the DPDs?

1.10. Gladman do not consider that the DPDs provide an appropriate arrangement to ensure proper monitoring and corrective action is taken should it become apparent that a shortfall in housing provision is occurring. The only reference to a potential review is contained in Policy SG1: Broad location for Growth – Bailrigg Garden Village which states:

“To ensure the timely delivery of the Bailrigg Garden Village, work on the Spatial Development Framework and the wider DPD has already commenced and it is anticipated to be ready for adoption within the first five years of the plan (i.e. before 2024). Failure to achieve this may result in the need for an early review of the Local Plan to ensure that housing delivery rates are maintained to meet development needs.”

1.11. As currently worded, there is no specific timeframe or requirement for completion of the review. This means that the Council has no specific imperative to do anything but consider the need to undertake a review and there is a risk that this is never completed. It is therefore suggested that in order to be as effective as possible, a review mechanism should be contained in a policy within the Monitoring Framework section which sets out a far more robust approach than what is currently suggested in Policy SG1. Specifically, the triggers for the review need to be meaningful, have teeth and contain an end date that is in the control of the Council. The policy should also include consequences for failing to meet the target dates. Gladman refer to the North-West Leicestershire Local Plan (adopted November 2017) as an example of an effective and implementable review policy. Policy S1 of the North-West Leicestershire Local Plan states:

“The Council will continue to work collaboratively with the Leicester and Leicestershire Housing Market Area (HMA) authorities to establish the scale and distribution of any additional provision that may be necessary in North West Leicestershire and elsewhere in the HMA as a result of the inability of one or more authority to accommodate its own needs as identified in the Leicester and Leicestershire Housing and Economic Development Needs Assessment.”
The District Council will commence a review of this Local Plan (defined as being publication of an invitation to make representations in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012) by the end of January 2018 or within 3 months of the adoption of this Local Plan (whichever is the later). The Plan Review will be submitted for examination within two years from the commencement of the review. In the event that the reviewed plan is not submitted within two years then this Local Plan will be deemed out of date. “

h) Does the sustainability appraisal (SA) adequately assess the environmental, social and economic effects of the DPDs?

and

i) Does the SA adequately consider reasonable alternatives where these exist, including in respect of the scale of housing and employment provision and the balance between them?

1.12. Whilst Gladman support the fact that the Council has considered a range of locations to accommodate housing and employment development, Gladman query whether the Council’s Sustainability Appraisal (SA) has adequately and correctly assessed the reasonable alternatives to the submitted plan strategy in terms of the quantum of housing needed to meet housing needs in full. In this regard, we question whether the Local Plan meets the requirements of the 2004 Planning and Compulsory Purchase Act and the Environmental Assessment of Plans and Programmes Regulations 2004.

1.13. As submitted, Policy S6 sets out a proposed housing requirement of 522 dwellings per annum to be delivered over the period 2011-2034. This includes an additional 3 years not included in the official plan period.

1.14. In determining the submitted spatial distribution of housing in the city, the Council tested a number of growth options. Gladman support the fact that the Council recognise that development to the South of Lancaster, through the delivery of sustainable urban extensions and the delivery of Bailrigg Garden Village, represent the most sustainable locations for future growth to meet development needs in quantitative terms, whilst also addressing wider plan objectives on achieving economic growth.

1.15. Notwithstanding our submissions in relation to Matter 2, the Council must ensure that it has tested its ability to deliver its full housing needs and its implications for the distribution of housing through the SA process and how a higher level of housing and development could ensure the delivery of the Plan’s wider aims and objectives.
2. Matter 2: Housing

Main Issue: Whether the Council’s strategy for meeting its housing requirement is sound?

Questions:

a) The identified objectively-assessed need (OAN) for housing for the area is 14,000 new dwellings (an average of 700 per year). The Council, as set out in policy SP6, identifies a requirement of 12,000 new dwellings at a rate of 522 per year. Is the Council’s housing requirement soundly based and supported by robust and credible evidence? Does it take appropriate account of the 2012-based DCLG Household Projections, the likelihood of past trends in migration and household formation continuing in the future, and ‘market signals’? Is the housing requirement appropriately aligned with forecasts for jobs growth? What implications should be drawn from paragraphs 7.9 – 7.13 of the Updated Consultation Statement February 2019, on the OAN figure.

2.1. The Council has prepared an Independent Housing Requirement Study (2015) and an OAN Verification Study (2018). The 2015 Study identified an OAN range of 650 to 700 dpa. The 2018 Study concluded that whilst more recent data coalesced around a slightly lower number, given the variability of this data the range identified by the 2015 Study remained robust. Our view is that this remains the case today. Certainly net migration since the 2018 Study has increased dramatically.

2.2. The most recent published numbers show net migration (1,252 persons) to be the highest for five years and above the long term average (1,166 persons per annum between 2001 and 2017). Furthermore, after some recent improvements in affordability in Lancaster, the most recent data is showing affordability has worsened in 2017.

2.3. Overall, we agree with the conclusions of the 2015 Study and the 2018 Study that the OAN identified by the Council remains the correct figure given the available information and its potential variability.

b) Are the constraints identified by the Council sufficient justification for not meeting the full OAN for housing in the District?

2.4. No. GDL objects to the Council’s proposed approach of not meeting the full OAN for housing on account of it not being positively prepared, justified or consistent with national planning policy (as is required by paragraph 182 of the NPPF 2012).

2.5. Plans should be based on a strategy which seeks to meet objectively assessed development needs, including unmet requirements from neighbouring authorities where reasonable and sustainable to do so (e.g. they should be positively prepared). Firstly it is clear that the plan fails to meet the housing needs of the area. The Council, at paragraph 9.19 of the Draft DPD, admit that instead of delivering an OAN of between 13,000 and 14,000 dwellings between 2011 and 2031, the DPD will plan for 12,056 between 2011 and 2034 (10,434 between 2011 and 2031 assuming annual delivery of 522 dpa). The plan is therefore failing to deliver, over the 2011 to 2031 plan period, between 2,566 and 3,566 houses that are needed to address demographic, economic and housing market pressures in Lancaster. This means between 20% and 25% of housing needs in Lancaster will go unmet.
2.6. Given both the 2015 Study and 2018 Study include upwards housing need adjustments for economic growth, the failure of the draft DPD to meet its needs will affect the economic competitiveness of Lancaster. Paragraph 8.3 of the draft DPD states that “the Council have identified economic growth as one of its corporate priorities.” Furthermore, paragraph 8.5 recognises one of the biggest challenges facing the district is “an increasingly aging population and, at the same time, a reducing working-age population.” It concludes that “to ensure there are people to fill the current jobs within the district then the Council must be positive in seeking to attract people to migrate into the district.” Clearly, a reduction in housing delivery of around 3,000 dwellings (equating to over 7,000 persons) over the plan period will have a significant impact on the DPD’s ability to deliver its economic strategy. There is no explicit discussion of the relationship between the reduced housing requirement and the economic strategy.

2.7. Paragraph 14 of the NPPF states that “local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits […] or specific policies in this Framework indicate development should be restricted.” The Council’s position as set out in the Assessing the Reasonable Alternatives Background Paper is that both caveats within paragraph 14 apply. In terms of ‘specific restrictive policies’ the district has a number of these including Green Belt, Birds and Habitat Directive sites and SSSIs. However the Background paper also provides a number of other reasons why it cannot identify sufficient sites to meet its needs including:

- Negative consultation responses to the expansion of rural villages (paragraph 7.16 of Background Paper)
- The sustainability of rural villages and wider environmental constraints such as landscape harm (paragraph 7.14 and 7.15 of the Background Paper)
- The infrastructure requirements of rural sites and urban extensions (paragraph 6.13 of the Background Paper)

2.8. Furthermore, the Background Paper (at Appendix A) provides a summary of around 35 ‘alternative site suggestions’ whereby it discounts sites for a diverse range of reasons including; site is existing open space, employment land, has a poor relationship with the built form, or has access and heritage concerns. These are valid considerations when weighing up housing need and site suitability as part of Local Plan preparation. However paragraph 14 is a tilted balance. It requires a Local Plan to meet housing needs unless the harm ‘significantly and demonstrably’ outweighs the benefits. GDL’s view is that this tilted balancing process has not been demonstrated in either the draft DPD or its evidence. Simply because there are potential landscape or accessibility issues with sites does not mean that the harm significantly and demonstrably outweighs the benefit of meeting housing needs across the district. We have significant concerns that the Council has not in this instance met the requirement of national planning policy which is a key test of soundness as per paragraph 182 of the NPPF.

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3 EIP Library Ref. No. P_012
2.9. To make the plan sound the LPA must undertake a thorough review of site availability applying the tilted balance to its consideration of sites and areas for growth. This would realise a much greater level of future supply and would allow the Council to deliver its full OAN.

c) What provision has the Council made for any unmet housing need and does the housing requirement take appropriate account of the need to ensure that the identified requirement for affordable housing is delivered?

2.10. GDL has significant concerns regarding the Council's approach to unmet housing needs. Firstly, as set out above, GDL considers that the Council has not undertaken a paragraph 14 compliant assessment of housing supply to meet its needs. Secondly, the Council's approach to its unmet need is unsound and contrary to national planning policy. The Assessing Reasonably Alternatives Background Paper states (paragraph 7.25) that:

"the level of engagement with neighbouring authorities have been extensive and are well catalogued in the Council’s ‘Duty to Co-operate Statement of Compliance’. It is concluded that there is a clear level of self-containment both in economic terms and in terms of the local housing market. This means that any options to request neighbouring authorities to meet our development needs (and vice versa) would not appropriately address the specific needs of this district."

2.11. Whilst there is a level of self-containment in the district, it is far from self-contained. Figure 1 is taken from the Independent Housing Requirements Study (page 9, 2015). It shows that there are tens of thousands of commuters travelling from and to Lancaster every day and there is therefore an active economic relationship with the surrounding local authorities. It is therefore not factually correct to say that housing in the areas surrounding Lancaster cannot not meet the needs of Lancaster when it is clear many 1,000s of people commute into Lancaster every day for work.
2.12. Paragraph 182, bullet 1, of the NPPF states that a plan “should be prepared based on a strategy which 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.” It is therefore clear in terms of paragraph 182 of the NPPF, that local plans should met the unmet requirements from neighbouring area where it is reasonable to do so. As set out above, it is reasonable for surrounding areas to meet these needs given their relationship to Lancaster. The sustainability of meeting these needs in neighbouring areas has not been assessed by the Council but there are certainly sustainable locations for growth in the authorities surrounding Lancaster which should be assessed further.
d) Is the Housing Market Area (HMA) agreed with adjoining authorities in line with the Planning Practice Guidance and does the plan period coincide with housing projections?

2.13. It is not clear whether there is full agreement on the housing market area. In respect of meeting housing needs the HMA is not particularly relevant in Lancaster as it runs concurrent with its administrative boundary. Lancaster has a duty as per paragraph 14 and 47 of the NPPF to identify and meet the housing needs of the HMA. Lancaster has identified those needs but is stating that it cannot meet them within its administrative boundaries (i.e. it has unmet needs). GDL’s position is that that conclusion is unjustified however for the Council, their next step is look beyond the LPA (and HMA) for areas where unmet needs can be identified. Paragraph 182 of the NPPF states that this should be in neighbouring areas where reasonable and sustainable to do so. The Council has clearly not demonstrated sufficient reasonable endeavours to ensure that its unmet needs are delivered in a sustainable manner in neighbouring areas. Its statement at paragraph 7.25 of the Assessing Reasonably Alternatives Background Paper that it would not be appropriate to deliver the unmet needs of Lancaster outwith the district is neither factually correct nor consistent with the NPPF. It is therefore unsound, unjustified and inconsistent with national planning policy.

f) Is the amount of land allocated for housing sufficient to meet the requirement and how will it ensure delivery of the appropriate type of housing where it is required within the District (with particular reference to Policies SP2, SG1, SG7, SG9, H1, H2, H3, H4, H5, H6, DOS7, DM1, DM2, DM4, DM7, DM8, DM11 and DM12)?

2.14. We are supportive of Policy SP2 which sets Lancaster’s status as a Regional Centre and the focus for future growth accommodating the majority of new development.

2.15. In high level terms we have always supported this policy in our Representations dated March 2017 and March 2018. We continue to support the inclusion of the land at Bailrigg within the defined area for Policy SG1. However, we have concerns over the delivery of Policy SG1 and therefore consider the Policy to be currently unsound.

2.16. Policy SG1 identifies a total of 3,500 dwellings to be developed at Bailrigg Garden Village. SG1 considers that 1,655 dwellings will be developed up to 2034 which is stated as being the Plan period, although the actual Plan period is 2031. We believe that this is not realistic with the current policy approach and it is therefore unsound.

2.17. In this Statement we have provided further detail on the likely timelines for the delivery of houses under Policy SG1 and have also set out how with changes to this policy, the timeline for delivery can be significantly improved.
2.18. It is important to remind ourselves that this Examination is looking, in part, at a Site Allocations process. Each allocation must be found sound and part of soundness is delivery as defined by paragraph 182 of the 2012 NPPF. In the case of SG1 the Council are relying on significant rates of delivery in the Plan period, yet there is very little detail. The detail is being pushed into the ‘Bailrigg Garden Village Area Action Plan’ (BGVAAP) DPD which carries its own independent timeline and has significant implications for delivery within the Plan period. This is in stark contrast to other Policies in the Plan such as H4 and H5 which are much more site specific in nature, are clearly based on an evidence base and reflect the unique characteristics of the particular sites.

2.19. We believe this approach is missing a significant opportunity for early delivery in South Lancaster. As a relevant historical comparison we wish to bring to the Inspector's attention to former draft policy SL2\(^4\) which was produced as part of the Draft Preferred Options stage in 2012. This draft policy was very specific as is expected of a Sites Allocations process and related solely to the land at Bailrigg Lane.

2.20. In brief, specifically the draft policy :-

1) Identified an indicative site capacity of approximately 750 dwellings;
2) Enshrined the requirement for a secondary access point at Blea Tarn Road / Hala Hill;
3) Sought the protection in perpetuity of the Key Urban Landscape running along the M6;
4) Identified the constraint to development under the power lines;
5) Acknowledged the relationship with the Science Park / Health Innovation Campus;
6) Sought mitigation measures relating to noise from the M6;
7) Sought planting and buffering around Bailrigg Village;
8) Sought 40% affordable housing; and
9) More generally sought the protection and enhancement of green spaces, ecology and high standards of design throughout the site.

2.21. In other words, the opportunities and constraints of the site were understood even then and the draft policy was shaped accordingly. At the time, we supported this policy approach.

2.22. The main conclusion that can be drawn from a high level analysis of this policy evolution is that the levels of detail and site specific requirements have reduced and the policies have become much higher level in nature and less site specific. This cannot be correct if 1,655 dwellings are to be delivered by 2031.

\(^4\) EIP Library Ref. No. C_PO_001 and Web Link LP09.14
Projected Delivery Rates

2.23. Working this back and assuming the Council’s adoption figure for the BGVAAP DPD is correct, being optimistic the following timescales are likely –

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<tr>
<th>Timeline to Delivery</th>
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<th>Gladman / Savills Approach</th>
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<tr>
<td>Tasks</td>
<td>Date</td>
<td>Tasks</td>
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<tr>
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<td>2024</td>
<td>Submission of outline planning application</td>
</tr>
<tr>
<td>Submission of outline planning applications</td>
<td>end 2024 / early 2025</td>
<td>Grant of outline planning permissions (including signing S106 agreements)</td>
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<tr>
<td>Grant of outline planning permissions (including signing S106 agreements)</td>
<td>early / mid 2026</td>
<td>Legal Transfers of land to house builders (if necessary)</td>
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<tr>
<td>Legal Transfers of land to house builders (if necessary)</td>
<td>late 2026 / early 2027</td>
<td>Submission of reserved matters applications</td>
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<tr>
<td>Submission of reserved matters applications</td>
<td>mid 2027</td>
<td>Approval of reserved matters</td>
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<tr>
<td>Approval of reserved matters</td>
<td>early 2028</td>
<td>Discharge of planning conditions and other legal agreements (S278, S104 etc)</td>
</tr>
<tr>
<td>Discharge of planning conditions and other legal agreements (S278, S104 etc)</td>
<td>late 2028</td>
<td>Start on site</td>
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<td>Start on site</td>
<td>early 2029</td>
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2.24. Assuming the Council’s model plays out as above, and, say, three volume house builders deliver dwellings at circa 35 units pa per developer, a total of 210 dwellings will have been delivered by the end of the Plan period at 2031.

2.25. Alternatively, with the Gladman / Savills approach for the land at Bailrigg and perhaps other locations, if, say, three volume house builders deliver dwellings at circa 35 units pa per developer over 9 years, a total of 945 dwellings will have been delivered by the end of the Plan period at 2031. This is still short of the 1,655 dwellings the Plan is relying on, but it is a considerable improvement.

2.26. The more strategic point is the significant extent to which draft SG1 is going to under deliver if it is left unaltered. In addition, if the Council are to undertake an early review of the Plan in 2024, the under delivery will be even greater still.

2.27. In order to address this issue we propose a number of modifications to the Plan for the Inspector’s consideration.
Main Modifications Sought

2.28. We support Policy SG1 and the inclusion of land at Bailrigg within the wider Bailrigg Garden Village area. However, as outlined above we have serious concerns over rates of delivery and therefore the soundness of the Policy. However, we consider that the Policy can be modified in a way which does not fundamentally alter the approach the Council are taking or their desire to develop the BGVAAP DPD, but importantly at the same time will ensure delivery in the short term.

2.29. We are therefore requesting that the Inspector considers an addition to SG1 and the Proposals Map which relates specifically to land at Bailrigg Lane and provides the levels of detail similar to that within the former draft policy SL2. We envisage that this could take the form of an inset area within the wider Garden Village area.

2.30. We would be more than happy to work with the Council to refresh this policy to reflect the latest thinking and updated survey work. So much is known about the land at Bailrigg Lane. The Plan as currently drafted is missing an opportunity by not containing a more detailed policy which would enable the site to come forward now and make a significant contribution to housing delivery over the plan period.

2.31. There are a number of advantages with this approach. These are:

1) Ensure early delivery and all the benefits which would result;
2) Build on a well established evidence base;
3) It would provide a level of detail commensurate for a Local Plan Site Allocations process; and
4) Would reconcile the Site Allocations process with earlier policies in the Plan and the Garden Village prospectus.

2.32. Land at Bailrigg Lane can be delivered independently of the wider infrastructure costs associated with land to the West of the West Coast Mainline and so will also act as a contingency should wider deliver falter.

2.33. With these changes we believe Policy SG1 can be found sound.

2.34. This approach is entirely consistent with the ‘Expression of Interest for a locally-led Garden Village’ document which was prepared by the Council to seek Garden Village status. A copy of the undated document is contained in Appendix 2.

2.35. The delivery section of this document (Section 8.0 and paragraph 8.1 page 12) includes the potential for delivery of:

- 450 dwellings between 2019 and 2022;
- Delivery of junction improvements to JCN 33 by 2022;
- Accelerated delivery to 300 dwellings pa to 2031;
- Increase of 4,000 new students by 2027; and
- 3,000 additional university employees by 2027.
2.36. It is clear that these timescales have slipped, but this further underlines the need for early delivery. It is clear from this document that the Council recognised that early delivery could occur and indeed encouraged it. This further underlines the need for a modification to the policy as sought.

2.37. The Council will no doubt argue that early delivery will be prejudicial to the preparation of the BGVAAP DPD. We disagree. The delivery of our site is not dependent upon the delivery of new infrastructure, facilities and services as part of the wider Garden Village. A standalone development can achieve sustainable development on our site, as well as through part of the wider Garden Village.

2.38. There is no other site in South Lancaster with as comprehensive evidence base as the land at Bailrigg Lane or as well related to the existing urban area and University. Delivery has always been linked to the construction of the Science Park / Health Innovation Campus access road which is now nearly complete. There are no other constraints to delivery and a proven promoter is now on board to expedite the planning and delivery phases.

i) Is the proposed monitoring likely to be adequate and what steps will be taken if sites do not come forward?

2.39. No. The proposed monitoring of SG1 states that if the ‘Bailrigg Garden Village Area Action Plan’ (BGVAAP) DPD is not adopted by 2024 then it might be necessary to have an early review of the Plan. This is too late. It has taken 8 years to get the current Plan to Examination. An early review on this basis would ensure that with SG1 as currently drafted there would be no delivery within the Plan period.
3. **Matter 3: Spatial Strategy**

Main Issue: Whether the Council’s spatial strategy for development within the District is sound?

Questions:

*a) Is the spatial strategy as set out in policies SP1, SP2, SP3, SP4, SP5 and SP6 and their supporting text soundly based? Is the settlement hierarchy soundly based? Would the spatial strategy be sound if no provision was made for any unmet housing need for Lancaster District either within the District or within the wider Strategic Housing Market Area?*

3.1. We are supportive of Policy SP2 which sets Lancaster’s status as a Regional Centre and the focus for future growth accommodating the majority of new development.

3.2. However, as set out in detail in respect of Matter 2: Housing, we are of the view that between 20% and 25% of housing needs in Lancaster would go unmet over the Plan period. As such, we have significant concerns that the Council has not met the requirements of paragraph 182 of the NPPF in respect of soundness.

*b) Policies SG1, SG2, SG3 and TC1 (Bailrigg Garden Village), Policies SG7 and SG8 (East Lancashire Strategic Site), SG9 and SG10 (North Lancaster) and SG11, SG12 and SG13 (South Carnforth): are the need and locations for these mixed-use developments soundly based on, and justified by, the evidence assembled by the Council in support of the DPDs?*

3.3. In so far as SG1 and the interests that we represent are concerned, yes. There is clearly a need for significant increase in housing delivery in Lancaster and given the geography and constraints of the District, South Lancaster is the obvious location and has been for many years.

3.4. In respect of the interests that we represent, the evidence base is significant and well understood. This is common ground. There is some land which has been more recently identified within the scope of Policy SG1, west of the A6 and West Coast Main Line, which is probably not as well understood and developed in evidence and this is one of the reasons the Council are keen to bring the ‘Bailrigg Garden Village Area Action Plan’ (BGVAAP) DPD forward after the Local Plan process. As we have previously set out in this Statement we believe this approach is misguided and is missing an opportunity in terms of those areas of land which have been considered for development for many years.
4. Matter 4: Economic development

Main Issue: Whether the Council’s strategy for accommodating economic development is sound?

Questions:

d) Would policies DM16 and DM18 recognise the function of new centres such as Bailrigg Garden Village and can the Council clarify how Retail Impact Assessments would apply in relation to policy DM16?

4.1. We consider that an addition should be made to policy DM16 to make reference to the requirement for a new Local Centre in Bailrigg Garden Village and that this should confirm that a Retail Impact Assessment will not be necessary providing the scale of retail proposed is sufficient to provide the needs of the new Garden Village development only. We acknowledge that the new centre is likely to be to the West of the A6 / West Coast Main Line, but consider that there may be some limited scope for convenience retail provision on the land interests we represent.
5. **Matter 5: Heritage and the Natural Environment**

Main Issue: Have the DPDs been prepared in accordance with the relevant statutory tests and the policies of the NPPF

Questions:

a) Do policies SP7, SP8, SG4, SG9, SG14, SG15, EC1, EC3, H3, H4, H5, H6, DOS1, DOS2, DOS3, DOS6, DOS7, DOS8, DOS9, DOS10, DM21, DM24, DM29, DM37, DM38, DM39, DM40, DM41, DM43, DM44, DM45 and DM46 provide for the conservation and management of the District’s built and natural heritage in accordance with the policies of the NPPF?

5.1. In response to the ecology/biodiversity sections of SP8, DM43, DM44, policies SP8, DM43 and DM44 are aligned with Chapter 15 of the NPPF, for the protection and enhancement of sites of biodiversity value, tree and woodland habitats and biodiversity as a whole. These policies make also due regard to wider ecological networks and the potential value of habitats outside formally protected area (functionally-linked land or FLL) which is of local relevance given the wide-ranging nature of important bird populations associated with Morecambe Bay and Bowland Fells SPA.

5.2. An appropriate assessment of the Bailrigg Lane development will need to be completed by Lancaster City Council at the application stage with regards to the Morecambe Bay SAC/Ramsar and the Morecambe Bay and Duddon Estuary SPA. A shadow AA is being prepared by CSA on behalf of Gladman which provides supplementary information to support the Council’s assessment and demonstrates that the Site does not comprise functionally-linked land. The Council have set-out a range of mitigation measures in relation to recreational pressure on the Morecambe Bay sites which development at Bailrigg can adhere to.

5.3. Ecological surveys are being undertaken at the Site by CSA to fully understand its biodiversity value and inform any avoidance, mitigation and compensation measures which will need to be provided alongside the development. Initial designs are sensitive to trees, hedgerows and woodland belts at the Site and its large size enables a comprehensive green network to be maintained with existing wildlife habitats and corridors. The majority of the Site comprises sheep-grazed species-poor grassland of low ecological value. There is therefore good scope to provide biodiversity net gain through the provision of diverse native planting and habitat features for wildlife. The Burrow Beck, a Biological Heritage Site (BHS) of local importance is adjacent to the north-west of the Site. The sensitivity and wildlife value of this feature is fully acknowledged within the development design and it is possible to provide a sufficient buffer corridor from the built development which can be managed for wildlife.
f) Can the Council clarify the justification for policies EN8, EN10, EN11 and SC2 (with regard to Freemans Wood, sites adjacent to the canal network, the River Lune, Over Kellet Craggs and the definition of extensive tract of land)?

5.4. Whilst it is noted that this question is directed to the Council, Gladman are of the view that Policy EN8 is unjustified and would only serve to add a further layer of planning policy protection that is considered unnecessary.

5.5. Policy EN8 suggests that it is the Council’s intention to provide further Areas of Separation to the South of Lancaster as part of the Bailrigg Garden Village to provide separation between the new development, Galgate and South Lancaster. The intention is that these areas will be specifically defined within the forthcoming Area Action Plan (AAP). Policy ENV8 makes the assumption that it will be appropriate to allocate additional Areas of Separation through a future DPD without having first carried out the necessary evidence to support the principle of such a policy. The suggested use of Areas of Separation in this location without evidence to support the principle is not a sound approach, justified or positively prepared.

5.6. This reference should not be included within the main body of Policy EN8 as it is merely an aspirational statement at this time with no guarantee that an Area of Separation will be included in the AAP. Indeed, the Council recognise that South Lancaster is the most sustainable location for future growth to meet the City’s housing needs and by implementing the principle of this policy with no guarantee that it will actually come forward, may result development proposals being refused based on the principle that an Area of Separation may come forward. Accordingly, this would limit the ability of sustainable development opportunities coming forward to assist in meeting development needs of the area contrary to the requirements of presumption in favour of sustainable development.

5.7. Gladman would question the rationale behind any future decision to allocate Areas of Separation in South Lancaster given the Council clearly identify this area as the most sustainable location to meet its housing needs. As previously submitted, Gladman consider that new development can often be located in countryside gaps without, leading to the physical or visual merging of settlements, eroding the sense of separation between them or resulting in the loss of openness and character of the area through the use of design principles.
6. Matter 6: Transport

Main Issue: Whether the Council’s strategy for accommodating transport infrastructure is sound?

Questions:

a) Are the transport schemes contained in the DPDs evidence based? How do they provide for the management of traffic movements in Lancaster City Centre (policies SP10 and SG4)?

6.1. The traffic schemes contained within the DPDs are based on evidence contained within the document entitled ‘Lancaster Local Plan – Transport Assessment Part 1 – Initial Assessment’ dated December 2018.

6.2. This document contains a range of potential off site highway works for the major Local Plan sites including the Bailrigg site. These include improvements at Section 8.2 – this section recommends a number of junctions that require ‘potential improvements’ by either 2023 or 2033. For the Bailrigg site, these are as follows:

- A6/Stoney Lane junction (Galgate signals).
- A6/Hazelrigg Lane (signals to the south of University).
- A6/Hala Road (Hala Road Signals).
- A6/Ashton Road (Pointer Roundabout).
- A6/Barton Road (priority junction north of Hala Road).
- Penny Street/Thurnam Street (city centre).

6.3. It is understood that the improvements proposed can all be accommodated on adopted highway.

6.4. In addition, the Bailrigg site will provide a dual access strategy to further manage traffic across the network and reduce traffic along the A6 corridor.

b) Has adequate consultation taken place with stakeholders in respect of policy T1 Lancaster Park and Ride?

6.5. We are not aware of any consultation that has taken place regarding the Park and Ride proposal. The WYG Local Plan TA also does not include any reference to it.

c) Can the Council clarify what is meant by a cycling and walking superhighway in policy T2?

6.6. We understand that this is a cycle link between the city centre and Bailrigg site and is part of the wider Housing Infrastructure Fund (HIF) bid for the Garden Village.

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5 EIP Library Ref. No. Tr_02, Tr_03
d) Are policies DM59, DM60 and DM62 in accordance with the policies of the NPPF?

6.7. It is our view that these policies are in accordance with the 2019 NPPF, in that it promotes sustainable travel, appropriate car and cycle parking provision, safe streets, walking and cycling.

e) Is the evidence for policy DM61 up-to-date and would it provide sufficient flexibility to deliver the desired reduction in private car use?

6.8. In our view, the evidence for this policy accords with the balance of providing sufficient car parking demand to cater for the likely car ownership within new residential developments, rather than car use, and ensuring that each resident has a meaningful choice of mode of travel.

f) Would policy DM63 be inconsistent with the Highways and Transport Masterplan?

6.9. In our view, this policy would be in accordance with the Highways and Transport Masterplan as they both include:

- Improvement to highway capacity on the A6 Corridor in South Lancaster, as highlighted within the Local Plan TA from December 2018.
- Improvements to traffic management in Lancaster City Centre, as highlighted within the Local Plan TA from December 2018.
- Improvements to connectivity around Morecambe Bay, as highlighted within the Local Plan TA from December 2018.
- Enhancing the role of Ultra Low Emission Vehicles.
- Investigating the Role of a New Rapid Transit System between South Lancaster – Lancaster City Centre – Morecambe – Heysham.
Appendices
Appendix 1
Site Location Plan
Appendix 2
Bailrigg Garden Village Prospectus
LANCASTER CITY COUNCIL

Expression of Interest for a locally-led Garden Village.

BAILRIGG GARDEN VILLAGE, LANCASTER

Project objectives, Scale and Planning Status.

The Concept

Bailrigg Garden Village presents the best opportunity in generations to extend Lancaster’s strategic housing supply in a manner which respects and reflects the ethical beliefs of the local community about sustainable living, local identity, and high levels of connectivity through public transport and cycling.

It will address the long standing “Town and Gown” challenge of integrating the university campus with the city, in a carefully master planned and themed manner, without simply extending the urban area around it.

The Garden Village will also assist the university with its aspirations to attract the highest calibre of staff and students to Lancaster by providing a bespoke new residential neighbourhood closely assimilated with the Bailrigg and Innovation campuses during an unprecedented period of growth”.

1.0 Project description: Bailrigg Garden Village :-

• Abuts the narrow southern boundary of the city of Lancaster.
- Incorporates the existing Bailrigg campus of the Lancaster University.
- Is an opportunity to strengthen the visual disconnect between town and country and enable a bespoke development to evolve as a Garden Village with the university campus at its centre.
- Will be built around the most effective public transport corridor in the district linking Lancaster city centre with the university’s public transport hub.
- Addresses needs arising from the next generation of growth at the Lancaster University.
- Could deliver 3,000 new homes up to 2031.

1.1 The key will be careful master planning and building vision into that plan. The landform around Bailrigg allows for creativity in design with interlinking heavy landscaped belts to create intimate neighbourhoods and corridors. Lancaster district enjoys a distinct range of urban design capable of being interpreted in both traditional and contemporary, and this must be at the heart of Bailrigg Garden Village. It must complement and enhance the evolving university campus yet have the ability to stand alone as a distinct settlement on the edge of the City of Lancaster.

1.2 Many of the original Garden Cities lost their main local employment hubs and have become commuter settlements within larger conurbations in recent years. At Lancaster there is a very real opportunity to create a bespoke Garden Village built around the districts most significant employment site with the added advantage of being directly connected to two of its other main hubs of employment none of which will need a car to access.
Figure 1: Location plan for Bailrigg Garden Village
2.0 The Strategic Growth Challenge for Lancaster

2.1 Work undertaken by Turley Associates to provide the evidence base for Lancaster District’s emerging Local Plan 2013-2031 highlights :-

- Low levels of natural population growth
- Low levels of inward migration
- Negligible graduate retention
- Outward migration by hidden households
- An ageing workforce within the local economy

2.2 The current sustainability the district enjoys with 80% of people living and working locally is under threat (For contextual background within Northern Powerhouse refer to Appendix A).

2.3 The council’s new Local Plan expects to plan for between 13,000 and 14,000 new homes between 2013 and 2031 to start to address the demographic challenge evidenced by Turley.

2.4 Within the context of that growth Bailrigg Garden Village has the ability to:-

- Deliver around 3,000 new dwellings and make a significant contribution to meeting housing needs, including starter homes – a national priority. Sufficient highway capacity will be released to consider increasing this figure even further to at least 5,000 in the longer term (subject to future planning decisions).

- Secure the long term growth aspirations of the Lancaster University. That growth would see 1,000 new staff employed on campus with associated housing and travel needs to be met.

- Enable the full potential of the Health Innovation Campus (2,000 jobs) which is of national significance to be realised. Growth is currently constrained by highway issues which can be unblocked by this proposal.

- Realise the full potential of the university through its leading work with SMEs to maximise the economic impacts to Lancaster and Lancashire.
3.0 **High Level Spatial Plan**

3.1 The ambition to create a Garden Village at Bailrigg arises from:-

a) The need to stimulate significant growth in the delivery of new housing in north Lancashire; and

b) The need to address a number of the key blockages to development in one of the few corridors where the Lancaster’s true growth potential can be realised.

c) Options to deliver a significant housing growth being restricted because of natural constraints. These broadly fall into coastal flood risk, Green Belt, Mineral interests, and Protected Landscape constraints.

d) The need to relieve a major corridor heavily constrained by traffic congestion which already has an impact on the level of growth permissible within the Lancaster University campus, the phasing of the Health Innovation Campus, and the delivery of housing.

3.2 The creation of a Garden Village enables a critical mass of development to be promoted which addresses these challenges by :-

a) Facilitating growth along the congested A6 Corridor by the construction of a major junction re design to M6 Junction 33, including potential new northern slips relocated close to the Lancaster University. These improvements are identified in the Lancaster District Transport Master Plan with an estimated cost £55m.

b) The delivery of a comprehensive land drainage strategy to facilitate the development and deal with current flooding challenges around Ou Beck, Burrow Beck and Galgate.

c) Integrating a new village within developing public transport networks and hubs, including investigating the potential for a southern park and ride interchange for the university and Lancaster city centre.

d) Delivering a commercially viable district centre serving the Garden Village, the Health Innovation Campus and the
Lancaster University. This may include new education provision.

e) Delivering an efficient and permeable local transport network whilst addressing the challenges of crossing the West Coast Main Line in two places.

f) Maintaining the integrity of the Lancaster Canal which forms the entire western boundary of the Garden Village at high level.

g) Delivering an effective balance between high quality market housing and affordable / starter homes for those needed to grow the districts workforce.

h) Supplying the Garden Village with high quality digital services.
Figure 2: Concept plan of Bailrigg Garden Village
4.0 Planning Status

4.1 Bailrigg Garden Village is:
   
a) An emerging allocation in the City Councils statutory Development Plan.

b) Identified as the most favoured option to deliver a large quantum of housing in a public consultation on options for housing growth between October and November 2015.

c) Expected to be included in the deposit draft Land Allocations DPD for the councils’ new Local Plan in December 2016.

4.2 The Lancaster University Innovation Campus :-
   
a) Has planning permission which has started to be implemented.

b) Reserved matters applications due to be submitted in August 2016 for the first phase of development.

c) Has been delivered through a development partnership between Lancaster City Council, Lancashire County Council and Lancaster University.

4.3 The Transport Master Plan for Lancaster due to be adopted by Lancashire County Council in September 2016 already identifies the infrastructure requirements to support the proposal.

5.0 Master Planning

5.1 Design ambition: The key to creating a well-planned and distinctive Garden Village will be master planning. The post-recession town planning environment in the north of England is faced with volume housebuilders who have jettisoned much of their commitment to urban design practice and the experiences learnt in the early years of the millennium. A return to quality place making requires the identification of very firm design objectives and standards. Bailrigg Garden Village must create a step change in the return to high standards and local distinctiveness.
5.2 **Integration:** The Lancaster University is about to embark on a refresh of its campus master plan to account for the innovation campus and Forest Hills. This process will be integrated with a wider master plan for Bailrigg Garden Village. There is already engagement with master planning specialists John McAslan and Partners in relation to this refresh and many of the design principles established for the university campus are capable of being applied in the same landscape setting.

5.3 **Connectivity:** The scheme presents a unique opportunity to achieve levels of connectivity otherwise only possible in metropolitan areas. The potential in this regard is huge as one of the districts major sources of employment already sits within the scheme and delivers integrated links to the city centre along an uncomplicated route, shared by a number of the districts other major employers.

6.0 **Governance**

6.1 The success of the current partnership between the City Council, the County Council and University will be the driving force.

a) Lancaster City Council will be responsible for planning policy, development management, land drainage and economic promotion and project management.

b) Lancashire County Council will be responsible for delivering highway infrastructure, transport planning, strategic economic development and support linkages with the Lancashire LEP through the current Growth Deal 3 applications.

c) The Lancaster University will be responsible for Master Planning, integrating high quality design criteria, and delivery of campus growth. Their estates management operation has the potential to become the management organisation for landscape and community infrastructure within the scheme.

6.2 The above partnership expects to operate as a Strategic Management Board assembling the key development interests which include Peel Estates and Bailrigg Farm Trust in a JVC or SDV.
6.3 Lancashire Enterprise Partnership supports the project and views the Lancaster University as one of its major economic drivers, and fully understands, through its Strategic Economic Plan, the importance of Lancaster District in cross boundary economic relations with Cumbria.

6.4 Since the identification of this potential land allocation information has been assembled about other landowners with a controlling interest.

6.5 Strategic highway infrastructure both within the A6 corridor and at junction 33 have been the subject of detailed discussions with Highways England. Detailed design work for potential junction improvement options is already underway.

6.6 The project has already been submitted as a bid for Growth Deal 3 funding and is currently ranked 2 out of 23 by the Lancashire LEP.

6.7 Virgin Media have taken the strategic decision to invest in upgrading digital infrastructure in Lancaster and have identified Bailrigg as a new digital hub for their product.
Figure 3: Map of known ownership parcels across the Bailrigg Village Garden site.
7.0 Constraints

7.1 The range of constraints which represent potential threats / blockage to the scheme fall within policy, land ownership and infrastructure challenges.

a) Out of date Local Plan in process of replacement.
b) Public support required for new draft plan in Winter 2016/17.
c) Support from Planning Inspectorate requires certainty over infrastructure delivery.
d) Introduction of CIL within district still uncertain.
e) The infrastructure requirements for flood risk management have not been evaluated since Storm Desmond.

8.0 Delivery

8.1 There is currently no specific delivery option preferred over another. All the potential options are to be evaluated alongside the master planning process. The Growth Deal 3 submission includes the potential for delivery of:

- 450 dwellings between a 2019 and 2022
- Delivery of junction improvements to JCN 33 by 2022
- Accelerated delivery to 300 dwellings pa to 2031
- Increase of 4,000 new students by 2027
- 3,000 additional university employees by 2027

8.2 Experience at Lancaster City Council includes a track record of delivering an entirely new settlement through a master planning and high quality urban design processes. Wychewood Park, Nantwich, Cheshire.
9.0 Exemplar

9.1 **Bailrigg Garden Village** presents a significant opportunity to become a best practice exemplar. It can demonstrate how early master planning and the setting of locally distinctive urban design criteria can restore design quality to the process of volume house building which has been a major casualty of the recent recession.

9.2 **Bailrigg Garden Village** will demonstrate how close collaboration between a major economic driver and local authorities can set the vision and standards for the creation of a new settlement, and drive delivery of built form coupled to lifestyle and wellbeing, paying homage to the concepts delivered by the industrial philanthropists in the early town planning movement in this country.

9.3 **Bailrigg Garden Village** will demonstrate how critical mass and ambition can overcome previously insurmountable blockages to growth and within the scope of a strict master plan. There will also be scope for accommodating innovative new forms of pre-constructed housing and self-build projects given the considerable scope for intimate phases.

10.0 Package of support

10.1 To advance the proposal the City Council is examining a package of funding measures to assist in preparing an overarching master plan for the proposals.

- An initial £55,000 will be allocated by the City Council and Lancaster University to extend the master planning process to the wider garden village
- Additional private sector funding which is capable of being recovered during the phased development amounts to a conservative estimate of £15 Million based on assumptions included in the council’s evaluation of potential CIL charging undertaken by GVA.
- These investments are estimated to assist in the delivery of over £600 Million in private sector housing investment.
10.2 Unblocking the current barriers to delivering Bailrigg Garden Village is estimated to require public sector support. This will be in the region of :-

1) Around £55m is required to provide the critical infrastructure to improve M6 Junction 33 and effect crossings of the west Coast railway line to unlock land for 3,000 -5,000 homes. Access to HCA funding streams required.

2) Around £15M is likely to be required to undertake detailed investigations into designing and constructing the land drainage infrastructure to facilitate the development and deliver the added benefit of mitigating surface water flooding evidenced during Storm Desmond. Access to EA design expertise and potential funding streams required.

3) The Local Planning Authority has experienced a depletion in its planning resources since 2010 so capacity funding to assemble a project delivery team for this major development would be required for a) the master planning exercise leading up to the consents process 2017/18 and b) the delivery phase post 2019 although this could partially be recovered through the use of a Planning Performance Agreement once a development partner or consortium is identified.

4) Master planning support and facilitation from ATLAS to work with the local authority and Lancaster University teams.

Andrew Dobson Dip EP MRTPI PDDMS
Chief Officer (Regeneration and Planning)
Lancaster City Council
adobson@lancaster.gov.uk
APPENDIX A: LANCASTER DISTRICT’S STRATEGIC NARRATIVE IN THE NORTHERN POWERHOUSE.

Within the Northern Powerhouse concept there tends to be an over dominating emphasis on the importance of large metropolitan areas to the exclusion of other communities. The large northern cities may well be powerhouses of commerce and manufacturing but cannot, and do not accommodate all key economic drivers and infrastructure projects of national importance.

It is very clear that the new economic landscape in the north will be dominated by large Combined Authorities linked through HS2 and HS3. For areas like Lancaster District the evidence base already suggests that these very metropolitan areas are drawing away a significant proportion of young talent and skills with Newcastle, Leeds, Liverpool and Manchester being the most popular destinations for its young people to seek their university education. Many do not subsequently return to strengthen the local economy and workforce.

Between them the shire counties of Lancashire and Cumbria are home to major hubs of the energy and defence industries. Two out of seven of the country’s nominated sites for new nuclear power stations are located there, together with National Grid’s largest infrastructure upgrade project in the UK. Both on shore and offshore, a significant amount of energy generation by wind power is housed here, serviced and linked into the national grid.

BAE systems have no less than three major manufacturing complexes in Lancashire and Cumbria and GSK are constructing a major new biopharmaceuticals plant at Ulverston. The two counties house several nationally and regionally important centres of higher education including the Lancaster University. There is however clear evidence of poor graduate retention and a mismatch between Higher Education provision and delivering the skills needed to support these vital industries. This evidence can be found in the skills plans for both LEP’s and within the emerging Great North Plan.

Both Counties also face similar challenges which could affect their continuing ability to house these substantial economic assets for the nation. Those challenges relate in more remote areas to demographic problems associated with replacing the ageing workforce, skills retention and encouraging inward migration. In addition to these the challenges
poor transport and communications links are very real constraints especially in the rural areas. Concerted efforts are needed to rise to these challenges if Lancashire and Cumbria are to maintain the ability to house these key industries.

Some of the basic assumptions decision makers make about the natural attractiveness of the landscape, its heritage coast and culture as promotional assets for inward migration no longer align with the desires of young people and families who need to be attracted to live and work in this part of the region. In short the excitement and draw of the major metropolitan areas out competes what can often be seen as remoteness and culturally disadvantaged locations when it comes to quality of life decisions being made.

Both the Lancashire and Cumbria Local Economic Partnerships have produced Strategic Economic Plans. Both highlight very well the contribution that the counties make to the Northern Powerhouse but in different ways describe the challenges of matching the skills needed to generate higher levels of economic growth. For Lancaster District the economic research carried out to influence the decisions to be made in the emerging Local Plan for 2013-2031 suggests that there are elements of both Lancashire and Cumbria scenarios which need to be addressed to protect the long term sustainability of the local economy.

The location of a relatively high volume of Further Education establishments within and well connected to it does not seem to be a guarantee of delivery of the skills needed to meet future demand and provide a replacement workforce in the years to come. Given their relative remoteness from larger urban concentrations around central Lancashire and Carlisle the local communities around Morecambe Bay within the administrative areas of Lancaster, South Lakeland and Barrow could look to each other to provide mutual assistance in the maintenance of a healthy economy around Morecambe Bay. Connectivity between employment growth in advanced manufacturing and housing/skills growth in popular locations is critical to success along with improving transport links between the two and taking positive action to match the cultural and service centre desires of those needed to be attracted to the area.

Increasing the local workforce need not start with encouraging increased inward migration. The first call could be to address the aspirations of school leavers and graduates many of whom also make up the hidden
households expecting to leave the district. These together with a proportion of graduates from the universities, who might aspire to stay in the area could be encouraged to do so with arrange of incentives. These incentives need to include:

- Affordable housing needs
- Access to employment
- Arts and Cultural enhancements in the districts service centres
- Retail and leisure enhancements in the districts service centres
- Broadband comparable to the metropolitan areas in both speed and reliability.

Attracting new workers to the area largely relies on the same set of incentives on top of the significant assets such as high quality schools, environment and accessibility which already exist.

There are already significant projects in the pipeline to address the deficiencies. The City Council wants to work with the HCA on a partnership to deliver the Governments Starter Homes initiative. A multi million pound investment in a Health Innovation Campus at the Lancaster University will be one of the Lancashire LEP’s priority initiatives. It will deliver around 2,000 new jobs and become a world class centre for research into the provision of health care for ageing adults based on pioneering developments in North America. The district is a nominated location for new nuclear build once its two existing power stations need to be replaced. Currently however to support the extended lives of these stations EDF Energy need to recruit 700 new Engineers in 10 years to retain a sustainable workforce. The completion of the Heysham/M6 Link Road brings with it expanded activity between the Port of Heysham and Ireland with jobs related growth in the Heysham Gateway area.

In Lancaster City Centre a new masterplan will link together the major retail/cultural redevelopment opportunity at the Canal Corridor North, with regeneration in the visitor economy and arts sectors across the City Centre and the renovation of Lancaster Castle under the custodianship of the Duchy of Lancaster. The Dukes Playhouse and Lancaster Grand Theatre will be provided with opportunities to grow and refine their contribution to the vibrancy of the City Centre. Significant growth in new student accommodation and the promotion of young worker accommodation in a similar format will enhance the attractiveness of Lancaster as a place to learn and subsequently work.
Major investments by BT and Virgin Media are making significant changes to the digital connectivity of the district which is also home to a growing number of digital media companies.

The Morecambe Bay University Hospitals Trust is working closely with the City and County Councils to rationalise its estate and effect a major long term overhaul of Lancaster Royal Infirmary to strengthen the resilience of the NHS around the Bay. Other strong collaborations such as Morecambe Bay Partnership and Marketing Lancashire deliver targeted heritage and visitor economy related regeneration projects to enhance the identity of the district as a unique destination for lifestyle to visit and relocate to.

Initiatives between the local authorities, further education establishments and the schools system are beginning to examine ways to create a single point of access to job opportunities and intelligence on education and lifestyle. All geared to giving young people more accurate information on career planning and lifestyle choices with the specific aim of challenging the belief that outward migration is the best choice for economic prosperity.