

MATTER 4

Submitted 5 September 2022

Matter 4: Transport

Issue: Whether the policies relating to transport are positively prepared, justified, effective and consistent with national policy

4.1 Is Policy T2 as drafted sufficiently flexible to allow for different circumstances?

Lancaster City Council Response

Yes. The proposed changes to Policy T2 relate to the provision of segregated routes and that such routes are accessible by all users. Local Transport Note 1/20 Cycle Infrastructure Design (LTN 1/20) provides detailed guidance from the Department for Transport on cycling infrastructure and is specifically aimed at highways and local authorities involved in the delivery of cycle routes and networks including through the planning system. The guidance is clear on the benefits of segregated cycle routes in encouraging the uptake of cycling particularly on busy and fast roads. Policy T2 reflects this guidance and also takes account of the different types of segregation in 'New paragraph 11' in the supporting text. The council nonetheless recognises that segregated routes are not always required or are sometimes difficult to achieve due to physical constraints and so the policy wording states they should be provided 'wherever possible'. This wording is considered to be sufficiently flexible to allow for different circumstances.

4.2 What would secure cycle parking mean in Policies T2 and T4?

Lancaster City Council Response

LTN1/20 defines secure cycle parking as 'not open to the passing public'. It is essentially for longer stay parking rather than a visit to a shop for example where visits are short and there is good surveillance. The council consider that 'secure' infers that provision will be in the form of a lockable store or shed rather than on-street cycle parking such as a traditional Sheffield Stand.

In the case of Policy T2 cycle parking is related to cycle routes specifically. In most cases cycle parking is likely to be short stay and in the form of traditional Sheffield Stands. However, the route could be associated with development generating significant levels of trips, where longer stay parking might be required

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in the form of a lockable bike store which will be determined on a case-by-case basis.

In the case of Policy T4, cycle parking is related to public transport hubs. These can take different forms and these are set out in 'New paragraph 13' in the supporting text. At such locations long stay cycle parking is highly likely and secure cycle parking is considered to be justified.

4.3 Is Policy T4 positively prepared and consistent with national policy?

Lancaster City Council Response

Yes. The adopted Policy T4 identified a series of public transport corridors across the main urban areas of the district. The additional wording as proposed under the CELPR describes how development can contribute to the development and enhancement of those routes and potentially other routes if there are deficiencies. The additional wording also requires all development to be easily accessible by public transport.

Taking into account the wording of the adopted policy and the additional wording being proposed, the council consider that Policy T4 is positively prepared.

The Policy is considered to be consistent with the Framework, most notably paragraph 104 (c):-

'Transport issues should be considered from the earliest stages of plan-making and development proposals so that opportunities to promote walking, cycling and public transport use are identified and pursued;'

and paragraph 105:-

'...Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes...'

4.4 Are the requirements of Policy T4 in respect of provision of new services and enhancement of existing services deliverable?

Lancaster City Council Response

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Yes. The drafting of the policy has been carried out in consultation with the Highways Authority. As a statutory consultee they respond to planning applications on Highways matters and make representations to the City Council. Depending on the scale of the development, their responses include an assessment of existing bus services and in many cases a request for new services or enhancements to existing bus services through the use of S106 contributions. The council consider the requirements to be deliverable based on past housing developments in the district and the requests for enhanced or new bus services made by the Highways Authority.

4.5 How will any deficiencies in existing public transport services be identified for the purposes of Policy T4?

Lancaster City Council Response

As a statutory consultee the Highways Authority makes representations to the council on planning applications. Depending on the scale of development the County Council's Public and Integrated Transport Team will provide input to the consultation response on a case-by-case basis. This will include an assessment of bus services in the area and identify any potential deficiencies based on a range of factors including the frequency of the existing service, its viability and the number of dwellings being proposed. A request will be made to the City Council for a S106 contribution in order to provide a new service or enhance an existing service, usually over a specific time period, up until the service is considered to be self-sustaining. Policy T4 has been drafted in consultation with the Highways Authority and it is anticipated that this current arrangement will continue. It is not considered that more prescriptive requirements are warranted given that circumstances will be very different from case to case.

4.6 How is a frequent high-quality public transport service defined in Policy T4?

Lancaster City Council Response

Policy T4 expects that developments generating significant levels of traffic movements to be supported by frequent high quality public transport linking them to Lancaster City Centre and other key destinations, such as the district's main

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urban centres and employment areas. The reasoned justification (new paragraph 12) sets out types of development likely to generate significant levels of traffic:-

'Developments likely to generate significant levels of traffic movements include, but are not limited to:

- Strategic housing allocations
- Proposals coming forward through the Lancaster South Broad Location for Growth

(including Bailrigg Garden Village)

- Future Employment Growth areas identified under Policy EC2
- Other residential development where there are deficiencies in existing services'

If such development lies within a Key Public Transport Corridor, as defined by Policy T4, 'frequent' services are expected to be at least 6 buses an hour. The high frequency of services on these corridors reflects the approach taken in the County Council's current Bus Service Improvement Plan key urban routes. Elsewhere, frequency will be considered on a case by case basis but should be no less than 2 services an hour.'

High quality infers that services are primarily regular and reliable and this will be expected at all sites. Other considerations are the use of low emission vehicles, the provision of shelters accessible to all, real time information, Wi-Fi and USB charging. The provision of Equality Act 2010 compliant accessible bus stops is essential (raised kerb, bus stop box, timetable cases) with bus shelters where possible. It is expected that bus stops are regularly spaced and no more than 400m apart. The provision of these facilities will be considered on a case-by-case basis but on Key Public Transport Corridors all or most of these aspects will be expected.

This matter is being considered in the emerging Sustainable Travel SPD but the council suggest that the above wording can be added to the reasoned justification of Policy T4 as a modification.

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4.7 What is the difference between a 'Bus Rapid Transit System' and a 'Better Buses Scheme' in Policy T4 and elsewhere in the Plans?

Lancaster City Council Response

A Bus Rapid Transit (BRT) System is broadly defined as having routes with dedicated bus ways or bus lanes and where buses are prioritised at junctions. The advice from the County Council is that the existing route network could not deliver a fully defined BRT system as originally intended. Whilst elements of the HIF proposal are to deliver sections of a dedicated sustainable transport corridor in South Lancaster, the more longer-term sustainable solution is to improve and expand the existing bus network. The terminology 'Better Buses' is now used to describe these improvements rather than 'Bus Rapid Transit System'.

4.8 Is the definition of a 400m walking distance soundly based in Policy T4?

Lancaster City Council Response

Yes. The council refers to the Institute of Highways and Transport guidance which is commonly referred to by local authorities and the transport industry and used widely within Transport Assessments.

'Planning for Public Transport in New Development' (IHT, 1999, paragraph 5.21) advises that, "New developments should be located so that public transport trips involve a walking distance of less than 400m from the nearest bus stop or 800m from the nearest railway station"

'Planning for Walking' (CIHT 2015, p.30) advises that, "The power of a destination determines how far people will walk to get to it. For bus stops in residential areas, 400m has traditionally been regarded as a cut-off point, in town centres, 200m. People will walk up to 800m to get to a railway station, which reflects the greater perceived quality or importance of rail services"

More recent CIHT guidance on bus provision talks about distances being related to the frequency of service (Buses in Urban Developments, CIHT Jan 2018)

The guidance recommends maximum walking distances of:

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- 500 metres on core bus corridors with two or more high-frequency services
- 400 metres on single high frequency routes (every 12 minutes or better)
- 300 metres on less frequent routes
- 250 metres in town/city centres

The guidance continues:- "These standard distances should not be applied uniformly without regard to the characteristics of the particular location or route. A shorter maximum distance may be appropriate for hilly terrain, for access to hospitals or older people's residences, or where the walking environment is unattractive."

The above references demonstrate the use of 400m as a widely accepted distance to walk to a bus stop. It is generally accepted by Local Authorities and is currently used by the Highways Authority in their responses to planning applications. Based on existing guidance and practices, the council consider the 400m walking distance to be soundly evidence based.

4.9 Should reference be made in Policies SP10, T2 and T4 to the need for the realignment of Junction 33 of the M6?

Lancaster City Council Response

No. Policy T2 relates to the development of the cycling and walking network and T4 relates to bus corridors and improvements to bus provision. Policy SP10 relates to the proposals set out in the Highways and Transport Masterplan and it is recognised that proposals within the Masterplan will evolve over the plan period.

As part of this review transport related matters have focussed on policies aimed at increasing uptake of sustainable modes of transport. Whilst the importance of the realignment of Junction 33 is recognised, particularly in terms of housing delivery, it is considered to be outside the scope of this review. Future whole-plan reviews of the Local Plan and the emerging Lancaster South Area Action Plan will consider how evolving infrastructure proposals are referenced in policy.

4.10 Is Policy SP10 effective and justified?

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Yes. There are new references to active travel and the emerging City Centre Movement Strategy but there are no significant changes to the adopted policy as a result of the review.

4.11 Is Policy SG12 effective and justified?

Lancaster City Council Response

Yes. Policy SG12: Port of Heysham and Future Expansion Opportunities, is a strategic allocation allowing for the growth at the existing Port of Heysham. The council have provided additional wording to ensure that public transport provision is considered in the future development of the site. This is consistent with the Framework as paragraph 104 (c) states that 'Transport issues should be considered from the earliest stages of plan-making and development proposals so that opportunities to promote walking, cycling and public transport use are identified and pursued;'

and paragraph 105 '...Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes...'

The council consider the additional wording to be effective and justified.

4.12 Are the policies and supporting text of the Plans consistent in how accessibility is referred to?

Lancaster City Council Response

Yes. The word 'accessibility' is used frequently throughout both adopted DPDs. Depending on the context, accessibility can refer to:-

- all modes of travel, e.g. accessibility of localities to the road network and railways at a regional or sub regional level.
- people with mobility impairments and their ability to access buildings and services
- sustainable modes of travel, e.g. accessibility to services primarily by walking, but also by cycle and public transport

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Within specific policies it is considered that policy wording and supporting text are consistent in how accessibility is referred to when context is taken into account. If there is ambiguity then additional wording might be considered to be appropriate to add to the text, but on a review the council does not presently think that this warranted.

4.13 Does Policy DM31's supporting text represent a reasonable approach to addressing air pollution? Should references to the Environment Bill in the supporting text to Policy DM31 refer to the Act?

Lancaster City Council Response

The main of the changes to the supporting text for policy DM31 are set out in 'new paragraph 34' and 'new paragraph 35'. New paragraph 34 directly quotes the most up to date Planning Practice Guidance in relation to mitigation options and sets out a series of mitigation measures that are within the PPG to demonstrate to applicants the different measures that can be considered. This is considered to represent a reasonable approach to addressing air pollution.

New paragraph 35 relates to the impact of particulate matter on air quality levels, which is becoming of increasing concern as set out within the Government's Clean Air Strategy and the recent Environment Act. It is recognised that there are [benefits of addressing climate change and air pollution together](#). Integrating climate change, air quality and the public health benefits helps to ensure that the synergies of addressing climate change can be maximised. This is because many of the processes and activities which result in the CO₂e emissions are also ones which result in air pollution including particulate matter. Heatwaves can result in reduced air flow meaning that ground level air pollution stays longer and can more easily concentrate exacerbating health and environmental impacts. [Ozone levels are increasing in the urban environment in the UK](#), warmer surface temperatures (which are increasing with climate change) increase the speed of ozone production at ground level which causes human and environmental health impacts. The greenhouse gas emissions which lead to the ozone formation are those which also contribute to poor overall air quality so mitigating them from the start is key. Therefore, given this is a review which specifically focusses upon addressing climate change, it is considered a reasonable approach to expect new development to consider, but not require, the impact of development in relation to both national

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and WHO quality standards in relation to minimising both particulate and nitrogen dioxide.

Agree that the references to the Environment Bill need to be changed to refer to the Environment Act (2021).

4.14 How will the Council ensure that development proposals are located where sustainable travel patterns can be achieved as per Policy DM60? Are the proposed changes to criterion II of Policy DM60 necessary given that criterion III of Policy DM60 refers to buildings and places being easily accessible?

Lancaster City Council Response

In determining planning proposals, the council will give increasing weight to the provision or otherwise of sustainable modes of transport. This will be informed by consultation responses from the Highways Authority and other relevant consultees. In addition, guidance will be provided in the emerging Sustainable Travel SPD as to how the relevant policies are to be applied. The emphasis within the SPD is very much on prioritising sustainable modes ahead of private car use. This will be through the design of housing layouts, development of active travel networks and encouraging more sustainable methods of construction. The SPD also sets out how Transport Assessments/Statements should place more emphasis on sustainable modes in new developments.

The council agrees on the second point regarding criterion II and III, and proposes to move the additional wording in parenthesis, from criterion II to criterion III as a modification.

4.15 Which paragraph of the Framework should criterion VIII of Policy DM60 be referring to?

Lancaster City Council Response

The council are referring to Paragraph 110 (b) within criterion VIII of Policy DM60. This relates to the safe and suitable access to sites for all users. A modification has been proposed to specify part (b) of paragraph 110.

4.16 Should the final paragraph of the Walking section of Policy DM61 refer to the additional criterion IV on accessibility?

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Lancaster City Council Response

The council agrees. A modification has been proposed to take account of the additional criteria in the final paragraph of the Walking section of Policy DM61. This will change the wording from '...set out in (I) to (III)...' to 'set out in (I) to (IV)...'.

4.17 What status does Local Transport Note 1/20 have? Will there be flexibility in applying this document?

Lancaster City Council Response

LTN1/20 was published in July 2020 and consolidated existing DfT guidance. It is an authoritative statement of guidance of direct relevance to the planning system and provides clear and well set out guidance and best practice for the delivery of cycling infrastructure. The DfT's intention is for it to be incorporated into local authority's design standards and Local Transport Plans. The implications of LTN 1/20 haven't yet informed the Highways Authority's consultation responses to planning applications but they will do so in the future.

Within the CELPR, LTN1/20 has been referred to in relation to segregated routes (Policy T2 of the SPLA DPD) and cycle parking (Policy T4 of the SPLA DPD and Policy DM62 of the DM DPD). With regards to segregated routes this has been addressed as part of Q4.1, and it is anticipated that some flexibility may be required.

In relation to cycle parking the council sets out in the adopted Local Plan (Appendix E of the DM DPD) minimum requirements associated with a range of development use classes. As part of this review these parking standards have been amended to reflect the minimum recommended standards set out in LTN 1/20. It is anticipated that these will be adhered to unless there is the clearest justification to suggest otherwise.

Policy T4 refers to the need for cycle parking at public transport hubs. LTN1/20 (section 11.6) sets out a range of cycle parking, dependant on the type and scale of the transport hub. The guidance is considered to be suitably flexible.

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4.18 With reference to Policy DM61, what does equitable implementation of cycling improvements look like? Furthermore, what is an aspirational route?

Lancaster City Council Response

Equitable implementation of cycling improvements in Policy DM61 replaces text which was noted as being outdated in that it referred to residents being lower on a social gradient. Equitable access means that cycling infrastructure is to be provided in all locations, however, it should be done to ensure that access to cycling is for all communities and is designed to "promote social inclusion, offering equality of opportunity and good services for all". Using the term "equitable" recognises that different areas and communities may have different needs in terms of infrastructure, access, and funding in order for them to provide the aims of equal access to cycle infrastructure. This may, for example, mean that areas with higher indices of social deprivation may need more and sooner improvements than other areas.

The SP&LA Policies Map identifies the existing cycling network (denoted in red) and a number of aspirational routes (denoted in purple). Figure 24.1 of the CELPR identifies the strategic cycling network and also incorporates aspirational routes. It is recognised that the existing network contains significant gaps in terms of providing a coherent network. Aspirational routes are potential routes that could fill those gaps and help create more useable and attractive routes. In terms of their existing status, they vary considerably and consist largely of existing highways and public rights of way. In each case they require further investigation to assess their feasibility.

4.19 Should the staff numbers for provision of shower facilities be included in Policy DM61 rather than in the supporting text?

Lancaster City Council Response

The council agrees. A modification has been proposed for the Policy stating that shower facilities should be provided for proposals where there are 5 or more staff.

4.20 Is Policy DM62 positively prepared, justified, effective, and consistent with national policy?

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Lancaster City Council Response

In November 2020 the Government announced plans to accelerate a greener transport future, phasing out the sale of new petrol and diesel cars and vans by 2030, and for all new cars and vans to be fully zero emission at the tailpipe from 2035. This requires a significant shift in how we power vehicles, especially private vehicles, and for such a shift to take place the infrastructure required to make this happen needs to be provided, especially within new development. Through the council's Scoping consultation it was evident that transport was a key issue to address through the CELPR. Topic Paper 3 **[TP_03]** which explored alternative approaches in relation to policy DM62 set out that to 'do nothing' in relation to guidance on electric vehicle charging points would have meant that a key opportunity to tackle climate change would be missed.

In 2019 the Government held a consultation on 'Electric vehicle charge points in residential and non-residential buildings' to explore potential changes to Building Regulations, setting out clear intentions to introduce specific requirements through Building Regulations. However, the Government did not publish their response until November 2021, and the CELPR commenced in July 2020. Given proposals to introduce requirements for electric vehicle charging infrastructure had been set out at a national level, and within the context of associated targets announced by Government, and locally the council declaring a Climate Emergency, the council considered it pertinent to take a proactive approach and incorporate electric vehicle charging infrastructure requirements as part of the CELPR to ensure adequate infrastructure would start coming forward as part of new development as soon as possible. Based upon the Government's recently adopted Building Regulation standards, and reflective of local development practices, and the need to address the Climate Emergency declaration, policy DM62 is still considered to be effective.

Even in 2016 the Highways and Transport Masterplan produced by Lancashire County Council stated that ULEV's (Ultra Low Emission Vehicles) would play a vital role in reducing the emissions from residual traffic and identified the delivery of ULEV infrastructure as one of the ways in which this could be achieved. A strategic document which Local Plan preparation is required to take account of.

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To further underpin the CELPR, an Air Quality Position Statement Addendum was produced (P_12) to provide an update to the Air Quality Position Statement produced by AQC in January 2019, recognising that air quality and climate change are intrinsically interconnected, and highlighted the role that electric vehicles can play in climate change mitigation.

Therefore, the requirements set out in relation to electric vehicle charging infrastructure are considered to be justified.

Furthermore, paragraph 107 of the Framework is clear that policies should take into account 'the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles. ULEV's are also set out as a key consideration in the National Design Guide, which states 'electric vehicle spaces and charging points need to be considered, so they are suitably located, sited and designed to avoid street clutter' (paragraph 87). The approach is therefore consistent with national policy.

The final Sustainability Appraisal (P_03) highlighted 'that changes to Policy DM62 in particular will have positive effects to air quality, as it will support rapid shifts towards the use of electric vehicles (which reduce roadside emissions)'. Further through the SA report, the policy was identified as having potentially harmful effects with regards to the historic environment, by facilitating notable changes to the street scene, and so the policy was amended (prior to regulation 19) to include policy wording to promote sensitive designs in such locations.

Policy DM62 has been prepared in collaboration with other departments within the council including Environmental Health (air quality), Public Realm (car parking) and Conservation (historic environment). As well as wider consultation at Regulation 18 and 19 with organisations such as Lancashire County Council and Electricity Northwest. This policy has therefore also been positively prepared.

Furthermore, the council is also working on an emerging 'Provision of Electric Vehicle Charging Infrastructure SPD', a draft of which has recently undergone pre-regulation 12 consultation. This SPD provides further detail on how to implement the EV requirements set out in policy DM62.

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The last section of Policy DM62 relates to the provision of cycle and mobility scooter parking provision. Details are provided for different Use Classes in Appendix E.

In the case of cycle parking, changes have been made in light of the publication of LTN1/20. Table 11.1 sets out minimum levels of provision for different land use types. Where the provisions set out in the adopted plan are less than that in LTN 1/20 then they have been amended to match the minimum levels in LTN1/20. Policy DM62 has therefore been positively prepared. The principle of ensuring cycle parking in new development through the use of cycle parking standards has been established within the adopted Local Plan. It is considered that the approach is justified, effective and consistent with national policy.

Mobility scooters are an increasingly attractive option for micro mobility in the UK particularly for those with limited mobility and as the population ages.¹ They may also form part of decarbonising travel for those whom active travel such as walking and cycling are not possible. This helps include more people in the race to net zero in recognition of The Equalities Act 2010². The storage and parking of mobility scooters have implications for fire safety, keeping emergency routes and pedestrian ways free and insurance requirements³. As per the Highway Code Rule 45 parking restrictions should be observed for mobility scooters.⁴ Policy DM62 therefore includes mobility scooters as vehicles with parking requirements. It is considered that the approach is justified, effective and consistent with national policy.

4.21 Does Policy DM62's coverage of electric vehicle charging overlap with Part S of Building Regulations?

Lancaster City Council Response

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/877222/Rica_Mobility_scooter_market_study_final.pdf

² [Equality Act 2010 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

³ [NFCC Mobility Scooter Guidance.indd \(nationalfirechiefs.org.uk\)](https://www.nationalfirechiefs.org.uk)

⁴ [The Highway Code - Rules for users of powered wheelchairs and mobility scooters \(36 to 46\) - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

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Yes, there is some overlap between the electric vehicle charging requirements set out in DM62 and Part S of the Building Regulations. However, given the council has declared a Climate Emergency and thus a need to address this as soon as possible, and to ensure that new development is future-proofed as much possible in preparation for the implications of the Government's targets (set out in answer to question 4.20), where appropriate, the council has sought to go beyond the requirements of Part S of Building Regulations.

In 'new paragraph 71' of the supporting text the council has set out its definition of 'associated space' to account for local circumstances, with further explanation and justification for doing so provided within the emerging 'Provision of Electric Vehicle Charging Infrastructure SPD' (which has been subject to pre-regulation 12 consultation).

The council has also sought to go beyond Part S of the Building Regulations in the second requirement set out in policy DM62, as Part S of the Building Regulations requires non-residential buildings with more than 10 spaces to provide a minimum of one charge point and in addition, cable routes for electric vehicle charge points for one in five of the total number of spaces (20%). Policy DM62 requires 20% of communal parking spaces to be provided with standalone chargers. As previously highlighted, the council has declared a Climate Emergency, and tackling issues such as air quality and facilitating modal shift are key to addressing this, and the delivery of electric vehicle charging infrastructure plays a fundamental role in delivering this. To help achieve both the council's and the Government's targets, the infrastructure needs to be available and accessible up-front to provide the consumer confidence needed to facilitate this shift in how we power vehicles, and installing infrastructure as part of a new development is much more effective than retrofitting.

The EV requirements have also been viability tested as set out in response to Matter 8.4.

4.22 Is there sufficient grid capacity to support electric vehicle charging requirements and has account been taken of the need to upgrade or reinforce electrical supply infrastructure?

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Any application for electric vehicle charge points goes through the local DNO, Electricity Northwest (ENWL). They maintain both the grid and electricity supply for the region. The council maintains a strong working relationship with ENWL and they monitor housing development allocations and proposals within the district to respond to the need for increased capacity.

In consideration of the national direction of travel it is for the complete transition to EV vehicles, and the Government is actively taking strategic, regulatory and financial steps towards delivering a modernised grid. The UK Government will phase out all new petrol and diesel vehicles by 2030⁵. They have published an electric vehicle infrastructure strategy⁶ which was prepared in consultation with energy stakeholders. Ofgem's has completed a Access and Forward-Looking Charges Significant Code Review (Access SCR) which include reforms to bring the grid into net zero future coming into effect in 2023.⁷ The Government is also requiring the installation of EV charge points in the residential setting through Part S of the Building Regulations⁸ which came into force in June 2022. From June 30th all EV chargers must also be smart chargers and be set at default to charge at off peak times.

In summary, yes to both points. Grid capacity planning takes into account local planning and national direction of travel, and EV chargers are now required to take into account grid capacity which supports delivery of Policy DM62.

4.23 Is there sufficient certainty about which applications the electric vehicle requirements in Policy DM62 would be applied to?

Lancaster City Council Response

Yes, Requirement 1 refers to all new development and change of use applications that involve one or more dwellings (including flats) with an associated space. An 'associated space' is defined in the supporting text ('new paragraph 71').

⁵ <https://www.gov.uk/government/publications/transitioning-to-zero-emission-cars-and-vans-2035-delivery-plan>

⁶ <https://www.gov.uk/government/publications/uk-electric-vehicle-infrastructure-strategy>

⁷ <https://www.ofgem.gov.uk/publications/access-and-forward-looking-charges-significant-code-review-decision-and-direction>

⁸ <https://www.gov.uk/government/publications/infrastructure-for-charging-electric-vehicles-approved-document-s>

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Requirement 2 refers to all new development and change of use applications that involve communal parking, which includes applications for dwellings (including flats) which do not meet the 'associated space' definition.

The council is also working on an emerging 'Provision of Electric Vehicle Charging Infrastructure SPD', a draft of which has recently undergone pre-regulation 12 consultation. This SPD provides further explanatory guidance on how to implement the EV requirements set out in policy DM62, including greater detail on which applications the electric vehicle requirements apply to, to ensure there is sufficient certainty.

4.24 Does Policy DM62 conflict with the energy hierarchy in Policy DM30a in respect of the use of renewable or low carbon energy generated on-site?

Lancaster City Council Response

No, the council does not consider Policy DM62 to conflict with the energy hierarchy in Policy DM30a. DM30a applies to regulated energy such as energy associated with heating, hot water, ventilation, and fixed electrics. EV charging is not included in Part L against which DM30a is based. Therefore, EV chargers and their electricity provision, including in terms of onsite renewables where possible, are outside of the energy use covered in Policy DM30a.

4.25 Are the requirements for covered and secure cycle parking in Appendix E of the Part 2 Plan reasonable?

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Lancaster City Council Response

Yes. Appendix E requires cycle parking to be covered and secure in the case of residential development and development that requires cycle parking for employees. In both cases cycle parking will be for long periods, and overnight in the case of residential development. In order to encourage the uptake of cycling, the provision of high quality parking provision is widely recognised as an important factor. Furthermore, given the growth in e-bike sales which can be expensive to purchase, this is increasingly important.

Policy DM62 of the adopted Local Plan requires the provision of cycle parking and Appendix E sets out levels of provision for certain development types. The requirements set out in the CELPR provide further clarity, and also reflect the levels of provision set out in LTN1/20 (Table 11.1).

The requirements set out in Appendix E are considered to be reasonable.

4.26 Is Policy DM64 effective?

Lancaster City Council Response

Yes. Policy DM64 sets out a range of proposals included in the Highways and Transport Masterplan which are to be implemented over the plan period. The Masterplan forms part of the Local Transport Plan which is prepared by the County Council. Whilst it is accepted that transport issues have moved on since the adoption of the Local Plan, it is considered that significant changes to the policy would be outside the scope of this review.