

**Barton Willmore, now Stantec on behalf of Story Homes**

**Examination into the Lancaster District Local Plan (Climate Emergency Review of the Strategic Policies and Land Allocations Development Plan Document and the Climate Emergency Review of the Development Management Development Plan Document)**

**Hearing Statement**

**Matter 4 - Transport**

**Q4.3 Is Policy T4 positively prepared and consistent with national policy?**

1. No. The proposals are not positively prepared or justified. Detailed reasoning as to why this is the case is set out below.

**Q4.4 Are the requirements of Policy T4 in respect of provision of new services and enhancement of existing services deliverable?**

2. It is not clear if the provision of the new services is deliverable based on 2 primary factors.
3. The first is that no viability evidence has been provided by the Council in terms of if this would be viability for either existing allocations or other sites coming forward during the plan period.
4. Indeed, paragraph 7.10 of the Council's viability evidence (P\_20.1) it is expressly stated that:

*"There are also some allowances for S106, where it is likely these maybe sought for travel planning, public transport or highways. These are not routinely sought by the council, so there is limited evidence (one s106 agreement) on which to base the figures."*

5. The proposed wording of the T4 policy has the potential to make such funding requests routine and therefore it is imperative that these are considered as part of viability evidence. Cushman & Wakefield undertook detailed analysis of the Council's viability evidence as part of their Regulation 19 consultation representations on behalf of the Cumbria Housebuilder Association, of which Story Homes is a part of. This analysis identified a number of matters where information was lacking, including in relation to policy T4. It is understood that Cushman & Wakefield will be providing a Hearing Statement on Matter 8 which will also comment on these deficiencies.

6. Indeed, it is Story Homes' experience that requests for this funding are already being made by Lancashire County Council Highways in consultation response to residential planning applications. An example of this is Story Homes' proposals at Grab Lane, Lancaster.
7. The proposal comprised 167 homes on land allocation for this purpose within the Local Plan. The development was on an existing bus route, however, while frequent, the service was not deemed commercially viable. As such, a request for £100,000 per year for 5 years (total of £500,000) was requested to support this service. This request was dated 16 July 2021 and was not accepted by Story Homes.
8. Other requests for funding have also been made by Lancaster County Council Highways, included in relation to a residential planning application for 116 homes at Quernmore Road, Lancaster by Bellway (21/01008/FUL). Here, a request was made for £50,000 per year for 5 years (a total of £250,000).
9. It is therefore clear that these requests are currently being made and are substantial. As such, they have the potential to have viability implications for development proposals and the policy requirement needs to be properly justified by evidence, particularly given that a number of other policy requirements are being proposed as part of the Climate Change Review which will also have financial impacts. At the current time this is not the case.

**Q4.5 How will any deficiencies in existing public transport services be identified for the purposes of Policy T4?**

10. This is not clear in the policy, supporting test or evidence base. We reserve the right to comment upon this when such information is available.

**Q4.6 How is a frequent high-quality public transport service defined in Policy T4?**

11. This is not clear in the policy, supporting test or evidence base. We reserve the right to comment upon this when such information is available.
12. Such a definition should be clear and sufficiently flexible to account for varying scenarios across the district. Criteria for assessment should include, but not necessarily limited to capacity, frequency, and time to travel to an employment / service centre.

**Q4.20 Is Policy DM62 positively prepared, justified, effective, and consistent with national policy?**

13. No. Policy DM62 does not accord with paragraph 16 of the NPPF as it contradicts other policies within the Local Plan. This is discussed further below.

**Q4.24 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?**

14. The energy hierarchy is clearly set out in Policy 30a and correctly identifies the utilisation of alternative energy sources as the lowest priority in terms of means to lower carbon emissions emanating from developments.
15. The current wording of Policy DM62 directly contradicts this hierarchy by stating that electricity provision from electric vehicle (EV) charging point should be from renewable or low -carbon energy generated on site.
16. As the grid moves towards zero carbon, so too will the energy produced to power the EV charging points. As such, the requirement for EV charging points to be powered by renewable or low carbon energy generated on site should be removed.