

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?

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

1. The Council refer to guidance within section 11.6 of LTN 1/20 Cycle Infrastructure Design, as part of the justification text to Policy T4. However, it would probably be beneficial for the Council to provide more details as to what they would be seeking in terms of secure cycle parking in the justification text. This text should also acknowledge that different types of secure parking may be required in different circumstances and locations, for example CCTV should not be required in areas with development overlooking or where cycle parking is likely to be short stay.

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

2. The HBF does not consider that Policy T4 is consistent with national policy.
3. The Council has amended this policy to state that development that generates significant traffic movements (this is likely to include strategic housing allocations and potentially other residential developments) should be supported by frequent high quality public transport linking them to Lancaster City Centre or other key destinations, such as the main urban centres and employment areas. It goes on to state that where there are deficiencies in existing services developers will be required to fund the provision of new services or enhance existing services.
4. The policy does not set out how deficiencies in the existing services will be identified or how frequent high-quality services will be defined, in order for this to be an effective policy more detail will be required.
5. The Council will also need to consider the balance between reducing carbon emissions, active travel, low-carbon private vehicles, working from home, access to existing or new services and the use of public transport. It may be that going forward providing additional public transport is not always the most sustainable option, or is only part of the most sustainable option, and this may also need to be considered as part of the determination of a planning application on a case-by-case basis.
6. The HBF would also note that it is not always possible to provide new or enhanced services, as this requires public transport operators to be able to provide these additional services, which may not always be the case, making the policy unimplementable, and not effective. This may particularly be an issue in rural areas or for smaller sites, or where the costs to support the service would be significant.
7. The HBF also notes that there may be significant costs that are associated with this requirement that will need to be considered in relation to the viability of development.

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

8. As set out above, the HBF is concerned that the provision of new services and enhancement of existing services may not always be deliverable and is often out of the control of the homebuilding industry. It may also be that there are significant costs associated with the provision, which may also not be viable or appropriate in terms of the relation to the scale of the site being developed.

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

9. The HBF does not consider that it is clear how any deficiencies in the existing public transport services will be identified. As this will potentially be an additional cost on a developer it is important that this can be considered early on, in the consideration of a sites purchase and delivery.

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

10. The HBF does not consider that Policy T4 defines what is considered to be a frequent high-quality public transport service. Although any definition may need to consider a level of flexibility, to ensure that it is appropriate taking into account location and time of day.

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?

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

11. Paragraph 14 defines a reasonable walking distance as 400m. There is no evidence as to why 400m or 5 minutes is considered to be a reasonable walking distance. The HBF would suggest that the Council may want to consider some flexibility to this 400m distance. The HBF considers that many other factors, including those such as the local environment, footpath quality, perception of personal safety, topography and quality of the public transport service, are likely to play in to the distance that people will consider reasonable.

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

4.10 Is Policy SP10 effective and justified?

4.11 Is Policy SG12 effective and justified?

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

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?

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?

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

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

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

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

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

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

12. The HBF does not consider that Policy DM62 is justified or consistent with national policy. The HBF considers that the policy unnecessarily duplicates building regulations, and as such is likely to cause confusion when both processes are trying to assess delivery of the same infrastructure.

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

13. The HBF considers that Policy DM62's coverage of electric vehicle charging overlaps with Part S of the Building Regulations.

14. The HBF is supportive of encouragement for the use of electric and hybrid vehicles via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to future proofing the housing stock. Part S of the Building Regulations 'Infrastructure for the charging of electric vehicles' has now been published and took effect from 15th June 2022. This document provides guidance on the installation and location of electric vehicle charge points (EVCPs). It states that a new residential building with associated parking must have access to EVCPs. It states that the total number of EVCPs must be equal to the number of parking spaces if there are fewer parking spaces than dwellings, or the equal to the number of dwellings where there are more parking spaces. The Regulations also set technical requirements for the charging points these include having a nominal output of 7kW and being fitted with a universal socket. The Government has estimated installation of such charging points add on an additional cost of approximately £976.

15. The Regulations do, however, include a cost cap of £3,600 for the average cost of installation and allow for other exceptions. The costs of installing the cables and the charge point hardware will vary considerably based on site-specific conditions in relation to the local grid. The introduction of EVCPs in new buildings will impact on the electricity demand from these buildings especially for multi-dwelling buildings. A requirement for large numbers of EVCPs will require a larger connection to the development and will introduce a power supply requirement, which may otherwise not be needed. The level of upgrade needed is dependent on the capacity available in the local network resulting in additional costs in relation to charge point instalment. The Government recognises that the cost of installing charge points will be higher in areas where significant electrical capacity reinforcements are needed. In certain cases, the need to install charge points could necessitate significant grid upgrades, which will be costly for the developer. Some costs would also fall on the distribution network operator.
16. In conclusion, it is not necessary for the Council to specify provision of EVCPs because of the Government's changes to Building Regulations.

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?

17. The HBF considers that this is a question for the Council. However, if this policy was deleted these issues would already be covered in the Building Regulations consideration of the provision of EV Charging Points and infrastructure in terms of the cost cap mentioned above.

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

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?

The HBF considers that it is not necessary for this policy to state that electricity provision should be provided through renewable and / or low carbon energy generated on site. The energy hierarchy is clear that priority should be given to energy conservation and energy efficiency before renewables, and renewables before low carbon. The HBF is also not clear why on-site provision would be preferable over other sources of renewable or low carbon energy, where scale may be a factor in their efficiency.

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

4.26 Is Policy DM64 effective?