

Lancaster Local Plan Hearing Statement

Submitted on behalf of Commercial Estates Projects Ltd

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Introduction

This Hearing Statement has been prepared by Lichfields on behalf of Commercial Estates Projects Ltd ('CEP', part of CEG). CEP owns land to the west of Scotforth Road, Lancaster which is identified as part of the 'Broad Location for Growth' for Bailrigg Garden Village at draft Policy SG1 of the submitted Local Plan.

1.0 **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?

a) The Council refers to Policies SO1 to SO5 “to some degree, being relevant throughout the sub-region” but could the Council be specific as to how these and any other policies would have an impact on any other local planning authority area?

1.1 This is a matter for the Council to respond to.

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?

1.2 This is a matter for the Council to respond to.

c) Has consultation been carried out in accordance with the Statement of Community Involvement and the relevant Regulations; how would the Council secure the mitigation outlined in Table 16 of the Habitats Regulation Assessment Report following the detailed screening of sites affected by policies in the DPDs (in particular SG14, SG15, EC1)?

1.3 The Council’s Matters Statement (ref. LCC7.1.0) includes an updated Habitats Regulations Assessment (‘HRA’) (March 2019). CEP has no substantive comment on the mitigation proposed within the HRA as it stands, and it is noted that mitigation options should ultimately be agreed at a project level.

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)?

1.4 CEP supports, and considers sound, the Council’s vision for Lancaster as a prosperous and growing historic city. This conforms with the NPPF’s pursuit of sustainable development. Key to achieving this will be the delivery of new homes.

1.5 In this context, and particularly given the unmet housing need in Lancaster compared to the evidenced Objectively Assessed Need, the presumption in favour of sustainable development can always be more positively applied. CEP believe that the delivery of significant and sustainable housing growth in South Lancaster, facilitated through a formal allocation within the Strategic Policies and Land Allocations DPD, provide an opportunity to do this.

e) Are the DPDs consistent with the Local Development Scheme and are they capable of meeting its objectives?

1.6 This is a matter for the Council to respond to.

f) How do the DPDs take account of the requirements under Section 149 of the Equality Act 2010, the Public Sector Equality Duty and the Human Rights Act 2008? In what way do the policies in the DPDs affect those with relevant protected characteristics as defined in s149 of the Equality Act 2010? In what way do the DPDs seek to ensure that due regard is had to the three aims expressed in s149 of the Equality Act 2010 in relation to those who have a relevant protected characteristic?

1.7 This is a matter for the Council to respond to.

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

1.8 This is a matter for the Council to respond to.

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

1.9 This is a matter for the Council to respond to.

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?

1.10 This is a matter for the Council to respond to.

2.0

Matter 2: Housing

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

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 Within previous Local Plan representations CEP has consistently supported the delivery of 13,500 new dwellings (or 675 dwellings per annum) across Lancaster District, as recommended within the Council's evidence base and particularly the 2015 Lancaster Independent Housing Requirements Study, prepared by Turley. This figure constitutes the Objectively Assessed Need ('OAN') in NPPF terms.
- 2.2 Within their submitted DPDs the Council discusses the constraints on housing delivery in Lancaster District (such as Green Belt, flood risk, environmental designations) and proposes a housing requirement of 12,000 over the plan period (522 per annum). Such a requirement clearly fails to meet the District's housing needs in full. It also calls into question whether the Local Plan is capable of supporting the Council's jobs growth and economic aspirations.
- 2.3 Notwithstanding this, and whilst the Inspector will examine the soundness of the DPDs against policies on housing need from the 2012 version of the NPPF, it is notable that the Government has since published updated Guidance on calculating Local Plan housing requirements alongside the February 2019 edition of the NPPF. This 'standard method' is derived from local demographic trends, and in particular the ONS 2014-based subnational household growth projections. Had the Local Plan been submitted after January 2019, then the adoption of this methodology would have resulted in a housing requirement of just 404 dwellings per annum across Lancaster District.
- 2.4 CEP therefore acknowledges that, in light of this evolving demographic picture, there is a balance to be struck in identifying an appropriate housing requirement for Lancaster. In order to find the DPDs effective and sound, however, there should be a sustainable proposal to absorb the District's unmet housing need; equating to around 1,500 dwellings. On the basis of the Council's submitted housing trajectory, it is assumed that just 1,655 units are deliverable within Bailrigg Garden Village during the plan period.¹ However, both the Council's evidence base and

¹ The Council's Matters Statement would appear to suggest a further lowering of these delivery projections, amounting to just 1,055 dwellings over the housing delivery period, and 655 units over the plan period. This is alongside further proposed amendments to both the overall housing requirement for the District, and the distribution of development proposed at Policy SP6, equating to the loss of some approx. 1,500 dwellings over the plan period. It is unusual for a local planning authority to propose such significant modifications to a submitted Local Plan in advance of the local hearing sessions. A recent Procedural Note produced by the Inspector for the Leeds Site Allocations Plan considered how suggested modifications should be addressed, having regard to the Planning and Compulsory Purchase Act 2004 (s20 7B&7C), the 2012 Local Planning Regulations and Planning Practice Guidance on Local Plans. In this context, the Note confirmed that "... once submitted for examination, the substance of a submitted plan can only be changed in one way, through a process of main modifications (MMs). MMs can only be made if they are (1) recommended by the Inspector and (2) necessary to achieve a sound plan." The status of the amendments proposed within the Council's Matters Statements is therefore unclear and, following the local hearing sessions, it is ultimately the Inspector who

the evidence prepared on behalf of CEP and other Garden Village landholders indicates that land immediately to the south of the built up area of Lancaster is available and deliverable now for housing, and would represent a sustainable urban extension to South Lancaster (see South Lancaster Landowner Group's Memorandum of Understanding at **Appendix 1**).

- 2.5 The CEP, Peel and Story Homes' (referred to hereafter as the 'South Lancaster Landowner Group') sites in South Lancaster, comprising land at Scotforth Road, Whinney Carr, and Ashton Road respectively as shown on the plan at **Appendix 2**) would be capable of delivering around 1,200 dwellings, many of which could come forward early in the plan period. Indeed, CEP's site is currently subject to a planning application for the development of around 95 units (application ref. 19/00332/OUT). The allocation of the wider site within the DPDs would facilitate earlier delivery within the Garden Village, with the opportunity to meet the majority of the District's unmet housing requirement later in the plan period within the wider extent of the Garden Village.
- 2.6 Specifically, the Council's unmet need currently stands at around 1,500 dwellings. Bailrigg Garden Village is anticipated to have capacity for around 3,500 dwellings, however the Council is currently planning for the delivery of just 1,655 new homes during the housing delivery period (and even less according to its Matters Statement). Given the high level of confidence surrounding the delivery of the CEP/Peel/Story Homes sites, and the advanced stage of the landowners' masterplan vision for a sustainable and well-planned urban extension to South Lancaster (see **Appendix 3**: Proposed Development Framework Plan and **Appendix 4**: Vision Document), the proposed allocation is clearly capable of delivering approx. 1,200 dwellings during the earlier part of the delivery period. According to the Council's own initial assessments of development capacity across the Broad Location for Growth, the wider Garden Village to the south is then capable of additional delivery through the Council's preferred Spatial Development Framework approach; plugging the gap in the Council's unmet need during the remainder of the delivery period.
- 2.7 As set out in CEP's previous representations, it should also be made clear that the Council's housing requirement is a minimum target in order to ensure consistency with the NPPF.

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

- 2.8 As set out above, the Council's identified housing target is not consistent with the NPPF's requirement to meet its objectively assessed need in full, and nor is it positively prepared or justified through the Council's evidence base. Indeed, Turley prepared and published an 'OAN Verification Study' in February 2018, which identified an updated OAN for the District of 605 dwellings per annum over the plan period. In terms of the DPDs' effectiveness, this presently leaves very little margin for error and the risk of failure is therefore high.
- 2.9 However, the constraints on delivery in Lancaster are not insurmountable. Indeed the soundness of the DPDs, and the delivery of the OAN, could be assured through the allocation of the most sustainable parts of the Plan's strategic development sites, and particularly the Landowner Group's holdings within the Garden Village, which are demonstrably capable of delivery in the short-term. By making an earlier contribution to housing delivery in the District, this would accelerate the Council's housing trajectory and therefore ensure the effectiveness, and soundness of the DPDs in terms of meeting the full OAN.

will decide if he would like the Council to formally consult on any modifications. CEP's Hearing Statement therefore focuses upon the DPDs as submitted, and also the evidence available to CEP and that submitted alongside the DPDs.

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 At present CEP is unclear as to the Council's plans to cater for the unmet need of around 1,500 homes across the District during the plan period. However, and as set out above, the Council's current proposed housing requirement assumes that only 1,655 units are deliverable within Bailrigg Garden Village during the plan period (and significantly fewer according to its Matters Statement). The allocation of available and deliverable housing land at South Lancaster, including CEP's site, for around approx. 1,200 units, with development commencing early during the plan period, would allow the Council to meet much of its unmet housing need elsewhere within the Garden Village during the remainder of the plan and delivery periods.
- 2.11 Identifying sufficient sites to meet the OAN in full is critical to the delivery of affordable housing across the District. The Council's Strategic Housing Market Assessment ('SHMA') Part II states that there is a high affordable need equating to 319 dwellings per annum in Lancaster; which would clear the backlog across the District in 10 years. However, the Council's Housing Land Monitoring Report (2018) reveals that just 33 affordable dwellings were granted approval between 01 April 2017 and 31 March 2018, equating to 16% of overall approvals. This indicates that there are fundamental issues regarding the viability of affordable housing delivery on new schemes across the District. The Council can only reasonably expect to increase affordable housing delivery significantly by adopting an ambitious overall housing requirement, which plans to meet its OAN in full. A lower housing requirement also means lower delivery of affordable housing.
- 2.12 Notwithstanding this, the Council's approach within the submitted Development Management DPD proposes a requirement for up to 40% affordable housing on greenfield sites. From CEP's perspective, and in order to ensure the soundness of the DPDs, clarity is needed that a review mechanism will apply to Bailrigg Garden Village in particular, in order to reflect the unique characteristics and infrastructure requirements of the site, which itself is fundamental to meeting the District's OAN.

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 This is a matter for the Council to respond to.

e) Are the DPDs clear as to the identified need for additional pitches for gypsies and travellers (policies SP6 and DM9) and is the identified need soundly based and supported by robust and credible evidence?

- 2.14 This is a matter for the Council to respond to.

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)?

- 2.15 As submitted, the amount of land 'allocated' for development within the DPDs is clearly not sufficient to meet the OAN in full. However, this could be rectified through the allocation of available and deliverable housing land at South Lancaster within the Garden Village 'Broad Location for Growth' for around 1,200 dwellings. The 'broad location' approach is incapable of

offering sufficient certainty on early housing delivery. The allocation of a sustainable urban extension at South Lancaster (illustrated on the Combined Site Area Plan at **Appendix 2** and including CEP's Scotforth Road site) would ensure the Council can meet the OAN in a sustainable and well-planned fashion. Opportunities to deliver further new homes over the plan and delivery periods could then be brought forward elsewhere across the 'Broad Location for Growth', further addressing of the District's unmet housing requirement.

- 2.16 Subject to this modification, the submitted DPDs would be considered sound; offering an evidenced and sustainable strategy to deliver an appropriate number and type of housing across the District.

g) Will the distribution, capacity and speed of deliverability (with regard to viability and infrastructure) of the sites, satisfy the provision of a 5-year housing land supply?

- 2.17 The allocation of the South Lancaster Landowner Groups' land (as shown on **Appendix 2**) for a sustainable urban extension to South Lancaster, and the removal of this land from the Broad Location for Growth, would provide a mechanism for the delivery of new homes across the CEP and wider Landowner Group's sites within five years. At present the Council's assessment of its five-year housing land supply takes no account of this. However, the CEP, Peel and Story Homes sites is each capable of delivery within the first five years to boost the Council's supply of deliverable housing land. Indeed, when considering the NPPF's criteria for deliverability, it would be counterproductive to omit the allocation of CEP's site in particular within the DPDs², for the following reasons:

- *Availability* - CEP's site at Scotforth Road is available for development immediately. Having promoted the site for several years, CEP has submitted an outline planning application (ref. 19/00332/OUT) for the development of up to 95 residential dwellings on the site, as well as a link road offering a means of access across the West Coast Mainline to the adjoining area of Whinney Carr, which is controlled by Peel;
- *Suitability* - CEP's site is largely contiguous with the existing built-up area of South Lancaster. It benefits from a highly sustainable location on a strategic transport corridor, bordered by a range of other existing and proposed strategic development sites. The site is situated within close proximity to existing residential and commercial areas, with a number of shops and services located a short distance to the north, and a public transport corridor running north-south along Scotforth Road. In addition, The Council's 2015 SHLAA report also identifies land at Whinney Carr (ref. 341), which includes the CEP site, as being potentially suitable for residential development, with a capacity for up to 900 dwellings across the wider site; and
- *Achievability* – CEP are willing landowners and keen to deliver housing development on their site quickly, in line with their longstanding collaboration with Peel and Story Homes. This is reflected in the submission of CEP's planning application for up to 95 dwellings, facilitating a link road through the site. The illustrative masterplan for the site, which is subject to the current planning application, is enclosed at **Appendix 8**.

- 2.18 The Council's evidence base also supports the delivery of land at South Lancaster in the short term. In particular, the Transport Assessment prepared by WYG (December 2018) suggests that both the CEP site and wider landholdings in South Lancaster are capable of delivery without giving rise to severe harm to the local highway network nor necessitating the delivery of any

² Peel and Story Homes will address the site specific issues in relation to their landholdings within their Hearing Statements. The sites are also jointly appraised within the Vision Document at **Appendix 4** of this Statement.

‘strategic’ highway improvements. Further analysis of the findings of WYG’s Transport Assessment, undertaken by Bryan G Hall on behalf of CEP and Peel and enclosed at **Appendix 5**, finds that up to 1,100 dwellings in total can potentially be delivered on the CEP land and Whinney Carr without the need for the strategic infrastructure tied to the wider Garden Village proposals, and this could also potentially include the delivery of proposals for approx. 150 dwellings on Story Homes’ site at Ashton Road.

2.19 To further demonstrate the sustainability and deliverability of the South Lancaster allocation, a Vision Document for the proposed development, prepared jointly by CEP, Peel and Story Homes, is enclosed at **Appendix 4**. This illustrates the advanced stage of the masterplanning for the sites, and provides a vision for the character and phasing of the proposed South Lancaster allocation as a sustainable and deliverable urban extension, capable of making a significant contribution to the provision of a 5-year housing land supply across the District.

2.20 Moreover, it will help to address the adverse consequences of the Council’s adoption within their Matters Statements of both the ‘Liverpool approach’ and a ‘stepped trajectory’ to attempt to cater for past housing under-delivery in the district, both of which serve only to push housing supply further back into the plan period. By contrast, the allocation of the South Lancaster sustainable urban extension would accelerate delivery within the first five-year period of the plan, across the CEP, Peel and Story Homes sites and assist in bringing forward urgently needed housing at an early stage to compensate for many years of under-delivery in the district in the recent past. This is clear from the housing trajectory set out on page 19 of the South Lancaster Vision Document – while this takes a cautious approach, particularly in relation to land outwith the proposed allocation area, it nevertheless highlights the potential for significant housing delivery within the Broad Location for Growth during the first five years of the plan period.

h) Do the DPDs make provision for addressing inclusive design and accessible environments issues in accordance with the NPPF?

2.21 The CEP site, and the wider northern extents of the Garden Village, benefit from a sustainable and accessible location on the southern edge of the built-up area of South Lancaster. It is situated within close proximity to existing residential and commercial areas, with a number of shops and services located a short distance to the north, and a public transport corridor running north-south along Scotforth Road. This represents a logical and sustainable extension to the existing urban area, form and character. The allocation of CEP’s site would therefore accord with the design and accessibility requirements of the NPPF.

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

2.22 This is a matter for the Council to respond to.

j) How will the housing allocations in the DPDs deliver the affordable housing set out in policies DM3 and DM6? What is the likely effect of DM6 on viability?

2.23 As set out above, the past record of affordable housing delivery in Lancaster is poor. The Council should therefore plan to increase affordable housing delivery as a proportion of an ambitious overall housing requirement, which should plan to meet the District’s OAN in full.

2.24 In this context, CEP’s primary concern remains the Council’s reliance upon a 40% affordable housing requirement from large new housing developments on greenfield sites, whilst simultaneously depressing the overall number of new homes to be delivered across the District relative to the OAN. We consider that the 40% requirement will affect the viability of many greenfield sites and, as a result, will stall development and housing delivery, particularly on

large, strategic sites with complex infrastructure requirements such as the Garden Village. This in turn will have an impact on the effectiveness of the Local Plan. Moreover, the 40% target for large greenfield sites does not appear to have been justified based on up-to-date information. For example, the Council's latest Local Plan Viability Assessment (Stage 2) (Lambert Smith Hampton, November 2018) suggests that viable levels of affordable housing provision for strategic sites across the District generally lie between 20% - 30%. This also reflects the findings of the Lancaster SHMA (Part II) 2018 Final Report, which itself assumes 25% delivery of affordable housing when considering future dwelling mix in respect of the OAN.

- 2.25 To ensure the soundness of Policy DM3, it should therefore be clarified that an appropriate affordable housing requirement can be devised on a site by site basis, taking account of more local viability considerations.

k) How do the DPDs sit with the aim of the NPPF to create sustainable, inclusive and mixed communities (Policy SP9)?

- 2.26 CEP would strongly advocate the sustainability and inclusivity credentials of both an urban extension to South Lancaster and also the wider Garden Village.

- 2.27 South Lancaster is already a well-established residential community, with good access to a wide range of jobs and services, and the CEP site has been identified as a potential location for an urban extension to Lancaster for a number of years in order to meet the District's housing requirements. It benefits from a highly sustainable location on the southern edge of the built-up area of South Lancaster, bordered by a range of other existing and proposed strategic development sites, as well as local facilities and a public transport corridor running north-south along Scotforth Road. As well as representing a logical and sustainable extension to the existing urban area, the allocation of the CEP site would facilitate early delivery within Bailrigg Garden Village and thereby contribute toward meeting the District's OAN.

l) Are policies EN6 Strategic Policies & Land Allocations DPD and DM49 of the Development Management DPD on the Green Belt consistent with the NPPF?

- 2.28 This is a matter for the Council to respond to.

m) Could the Council provide clarification on the amount of housing to be provided within individual neighbourhood plans (Policies SC1 and DM54)?

- 2.29 This is a matter for the Council to respond to.

3.0

Matter 3: Spatial Strategy

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

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 CEP broadly agree that the spatial strategy is soundly based in terms of identifying Bailrigg Garden Village as integral to meeting the housing needs of the area (see comments on the general sustainability of Policy SG1 in our response to question 3(b)). However, CEP does not consider the Council's plans at Policy SP6 to deliver 1,655 dwellings (or many fewer according to its Matters Statement) within the Garden Village during the plan period to be positively prepared or sufficiently ambitious. Fundamentally the Council's latest evidence base, together with the assessments undertaken in conjunction with CEP's own planning application, reaffirm CEP's view that a sustainable urban extension to South Lancaster (comprising the South Lancaster Landowner Group's holdings, as shown at **Appendix 2**) is deliverable and should therefore be subject to a site-specific allocation.

3.2 Greater clarity is therefore required as to both the amount, location and phasing of development which can be brought forward within the Garden Village. The soundness of Policy SP6 could be assured through the allocation of the Landowner Group's holdings for housing development. Through making an earlier contribution to meeting the District's housing need, this would accelerate the Council's housing trajectory and therefore ensure the effectiveness, and soundness, of the DPDs. In doing so, the Council could then focus upon the delivery of the wider Garden Village within the plan period, with the potential to deliver the additional housing required within the plan period to meet the District's unmet need.

3.3 At the very least Policy SP6 should be amended to clarify that any identified housing requirement is a minimum target, in order to boost significantly the supply of housing as required by the NPPF, (and also clarify that this is a 'net' figure taking account of demolitions and/or other losses from existing stock).

3.4 Discrepancies within the plan period should also be clarified and reconciled prior to adoption. In particular, the official plan period concludes at 2031/32, however the housing delivery trajectory described within the background text to Policy SP6 stretches to 2033/34.

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?

3.5 The submitted DPDs propose to identify land at South Lancaster for 3,500 homes as part of Bailrigg Garden Village. As well as being integral to the Council's strategy to meet its housing requirement and reconcile past under-delivery, the allocation of housing development within the Garden Village (and CEP's site specifically) would follow a well-established policy position in terms of the Council's strategy for South Lancaster. The necessary revisions to the wording to policy SG1 to facilitate the allocation are enclosed in draft at **Appendix 6**, and illustrative masterplan for the wider site is included at **Appendix 7**.

- 3.6 The northern part of the Policy SG1 Garden Village Broad Location for Growth, including the CEP site, has been identified as a potential location for an urban extension to Lancaster for a number of years in order to meet the District's housing requirements, and the site has been shown as a potential residential allocation in draft Local Plans dating back to 2012. The CEP site forms the eastern parcel of the much larger Whinney Carr site (controlled by Peel and itself part of Bailrigg Garden Village) to the west of the West Coast Mainline, which was previously the subject of a planning application for 535 dwellings in 2000 (application ref. 98/01207/OUT). The Council supported this application, as did a Planning Inspector following call-in by the Government for determination, however it was ultimately refused by the Secretary of State in the light of changes at the time to the overarching housing requirements set out within Regional Planning Guidance. The Inspector's 2002 Report on the scheme concluded that the wider Whinney Carr site is well-placed to be a sustainable urban extension in terms of access to jobs and social infrastructure.
- 3.7 As set out above, the CEP site, and the wider northern area within the Garden Village, benefit from an already sustainable location on the southern edge of the built-up area of South Lancaster. It is situated within close proximity to existing residential and commercial areas, with a number of shops, services and facilities located a short distance to the north. It is also located adjacent to a well-served public transport corridor running north-south along Scotforth Road. It therefore clearly represents a logical and sustainable extension to the existing urban area.
- 3.8 The delivery of CEP's site is also critical to opening up the wider Garden Village site, as it offers the potential to facilitate access over the West Coast Mainline via a new bridge. The bridge link would provide wider access opportunities in South Lancaster and, in particular, provide the ability to closely link the existing public transport services on Scotforth Road with the Garden Village site; creating the potential for a coherent, flexible and wide-ranging bus strategy. The bridge link across the West Coast Mainline would also complement the Council's aspiration for delivery of Bus Rapid Transit (BRT) in South Lancaster as detailed within the County's "District of Lancaster Highways and Transport Masterplan" (Policy DM63).
- 3.9 Equally, the Council's evidence base provides robust justification for the allocation of land at South Lancaster to speed up housing delivery. In particular, the additional evidence prepared by WYG (December 2018) on behalf of the Council tests a draft allocation of some 1,650 dwellings at the Garden Village, which are assumed to be delivered within the period to 2033. The WYG work suggests that both the CEP site and wider landholdings at South Lancaster are capable of being delivered in the short to medium term, subject to minor highway enhancements and interventions at key junctions within the local area, without giving rise to severe harm to the local highway network or necessitating the delivery of any 'strategic' highways improvements which are subject of the Lancaster HIF bid.
- 3.10 Bryan G Hall (BGH) on behalf of CEP and Peel have undertaken a detailed review of the WYG evidence base and this is enclosed at **Appendix 5** (ref: 18-262-003.04 dated February 2019). BGH confirm that up to 1,100 dwellings in total can potentially come forward as a sustainable urban extension in the northern part of the area identified as the 'Broad Location for Growth' prior to strategic highway intervention. There is, therefore, substantive highways evidence which supports the early release of land for residential development in South Lancaster.
- 3.11 Given the integral role the Garden Village will play in underpinning the Council's strategy for housing delivery in the District (as set out at Policy SP6), Policy SG1 should therefore formally allocate the northernmost part of the 'Broad Location for Growth' for residential development, including CEP's site on Scotforth Road. Without a clear allocation, sufficient certainty cannot be provided that the District's housing requirement is deliverable.

- 3.12 Allowing for a more flexible approach to delivery within the Garden Village would also ensure Policy SG1 of the DPD (and by implication Policy SP6 regarding housing delivery) is positively prepared, justified and, therefore, sound. CEP appreciates that the Council intends to prepare an Area Action Plan for the entire Garden Village. However, given the size of the Broad Location for Growth and the complexity of its infrastructure requirements and land ownership it is inevitable the DPD preparation process will take many years, and delay the delivery of those parts of the Garden Village which are suitable and available to be brought forward now, at a time when the Council is critically in need of additional housing supply. The Council could then pursue the development and delivery of the wider Garden Village through their preferred Area Action Plan DPD approach.
- 3.13 Draft Policy SG1 currently indicates that the Council will not support proposals brought forward in advance of the adoption of the masterplan. However, this could jeopardise the delivery of the Council's housing requirement within the early years of the plan period, and raises concerns as to whether the DPD has been positively prepared and is likely to be effective. It is not CEP's intention either to prejudice the delivery of Policy SG1 or to pre-empt any planning contributions – CEP's facilitation of the vehicular access to the Garden Village alone is a considerable planning contribution. Rather, the lack of clarity regarding the delivery of the Council's proposals for the Garden Village, particularly considering the extremely limited progress made by the Council to date since the designation of the area in 2017, mean that years will pass before an AAP is adopted and housing is delivered. As identified within the Council's evidence base, and alongside its failure to identify sufficient sites to meet the District's OAN, Lancaster needs housing delivery now.
- 3.14 On the basis of the Council's updated evidence, and also CEP's own work as evidenced through its planning application, it is logical that CEP's site should therefore be allocated for development and delivered as an early phase of the Garden Village within the first five years of the plan period. To prevent this through the DPD would not be sound.

6.0 Matter 6: Transport

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

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 Council's response to Matter 6 (25 March 2019) confirms their transport schemes have been identified through the Local Transport Plan (2011-2021) and more recently the Lancashire County Council Highways and Transport Masterplan. The Masterplan is considered by LCC to carry significant weight in light of recent national planning policy guidance contained within the NPPF.
- 6.2 The subsequent WYG Transport Assessments (December 2018) identify key constraints on the highway network and short to medium term solutions to facilitate the early delivery of housing in the District, prior to infrastructure, which form the basis of the recent HIF bid.
- 6.3 The WYG assessments identify those strategic infrastructure schemes which are required to 'unlock' delivery of Bailrigg Garden Village. The highway infrastructure schemes are also detailed within the Council's Infrastructure Delivery Schedule (update December 2018).
- 6.4 In response to the WYG Transport Assessment a Highways Technical Note has been produced by BGH on behalf of CEP and Peel in respect of their landholdings in South Lancaster (**Appendix 5**).
- 6.5 Whilst agreeing with the general approach adopted by WYG, in the absence of a Strategic Transport Model (STM) which is recognised by the Council as a weakness of the assessment, and notwithstanding the positive conclusions reported in the WYG assessment regarding the potential for early housing delivery in South Lancaster, the BGH report raises specific observations and concerns which are consistent with the recent representations to the Emerging Local Plan by Highways England and the County Highway Authority.
- 6.6 BGH's report concludes that the WYG assessment is unnecessarily cautious and underestimates the level of development which could come forward in South Lancaster without the need for significant intervention.
- 6.7 The second part of the BGH Technical Note builds upon the WYG assessment and sets out the findings of its own high-level highways assessment for the CEP landholding and the adjacent Whinney Carr site controlled by Peel. It demonstrates the quantum of development that could be brought forward in advance of strategic highway improvements (and which could potentially include the delivery of Story Homes' proposals for approx. 150 dwellings at Ashton Road).
- 6.8 The BGH analysis shows that there is sufficient capacity (subject to works identified by WYG) to allow both early delivery of development on the CEG land and Whinney Carr site, either individually or in combination, and also Story Homes' development on Ashton Road. This demonstrates that development at the northern parts of Bailrigg Garden Village has the ability to make an important early contribution to the housing needs of the District.
- 6.9 In addition to physical interventions, the Council makes clear that it is keen to ensure that any developments that are delivered using this capacity achieve its objective through sustainable travel modes and achieving modal shift. This can be achieved through the allocation of an initial phase of development in the northern area of Bailrigg Garden Village.

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

6.10 This is a matter for the Council to respond to.

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

6.11 This is a matter for the Council to respond to.

d) Are policies DM59, DM60 and DM62 in accordance with the policies of the NPPF?

6.12 This is a matter for the Council to respond to.

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?

6.13 This is a matter for the Council to respond to.

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

6.14 If anything, CEP would comment that Policy DM63 is unnecessary duplication of other schemes within the SPLA DPD and the measures already included within the Transport Masterplan.

7.0

Matter 7: Environment

Main Issue: Are the DPDs in accordance with the NPPF in respect of open space, recreation, design and renewables.

a) Would policies DM26, DM27, DM30, DM31, DM55, DM56, DM57 and DM58 adversely affect development viability?

7.1 CEP would comment solely in respect of Policy DM57, which relates to infrastructure delivery.

7.2 In advance of the adoption of any Community Infrastructure levy ('CIL') Charging Schedule, and given the potential for CEP's site at Scotforth Road to be delivered as an early phase of the Garden Village, in the interests of soundness it should be ensured that any site-specific developer contributions accord with the requirements of Regulation 122 of the CIL Regulations, i.e. any obligations need to be directly related to the development, necessary in order for the development to proceed, and be fairly and reasonably related in scale and kind to the development.

7.3 Following the submission of CEP's previous representations, the Council has published a range of evidence base documents, including a Local Plan Viability Assessment (Stage 1) (prepared by Lambert Smith Hampton, April 2018) and a Local Plan Viability Assessment (Stage 2) (Lambert Smith Hampton, November 2018). These assessments provide a high-level, formulae-based approach to assessing the viability of a representative range of development scenarios within the District. They include analysis of three of the Council's proposed strategic sites, but state that detailed planning policy for the Garden Village site is to be developed through an AAP and the viability of that site will therefore be tested through the AAP plan preparation process. Without any detailed understanding of the viability of the Garden Village sites, it is imperative to the soundness of the DPDs that any crude assumptions as to the scope of developer contributions are omitted at this stage.

7.4 This is particularly the case given the emerging DPDs identify scope for the Garden Village to fund, or at least contribute to, a wide array of infrastructure. This includes the reconfiguration of junction 33 of the M6, improvements to the A6 corridor and a bus rapid transit network, a strategic link road into the Garden Village over the West Coast Mainline, local facilities and services, and also 40% affordable housing.

7.5 CEP's site is not typical of other sites within the wider Garden Village. As well as having different environmental characteristics, it represents a unique opportunity for delivery early in the plan period. For example, it is important to recognise that a key component of CEP's current application proposals is the facilitation of a link road through the site, itself constituting a significant contribution to infrastructure delivery within Bailrigg Garden Village.

7.6 In this context, it is clearly not possible to come to a view on the effect of Policy DM57 upon the viability of the Garden Village at this stage. To ensure the soundness of the DPDs, it should be clarified that any developer contributions to infrastructure should be arrived at on a site by site basis, taking account of more detailed viability considerations.

b) Are policies DM29, DM33, DM34, DM52 and DM56 in accordance with the policies of the NPPF in respect of design, flood risk, drainage, low carbon energy generation and health and well-being? Does the Development Management DPD require a flood risk document to be added to Appendix B?

7.7 This is a matter for the Council to respond to.

c) Could the Council clarify the scope of policy EN11?

7.8 This is a matter for the Council to respond to.

Appendices

Appendix 1	South Lancaster Landowner Group Memorandum of Understanding
Appendix 2	Proposed Area for Allocation
Appendix 3	Ballrigg Garden Village Proposed Development Framework Plan
Appendix 4	South Lancaster Vision Document
Appendix 5	Highways Technical Note
Appendix 6	Draft Revised Wording to Policy SG1
Appendix 7	South Lancaster Illustrative Master Plan
Appendix 8	Illustrative Masterplan for CEP's Land at Scotforth Road (planning application ref. 19/00332/OUT)

Appendix 1 South Lancaster Landowner Group Memorandum of Understanding

South Lancaster: Memorandum of Understanding

This Memorandum of Understanding is prepared jointly on behalf of Commercial Estates Projects (CEP), Peel Investments (North) Limited (Peel) and Story Homes Limited; hereby known as the South Lancaster Landowner Group (or 'Landowner Group').

Subject to the individual representations submitted in relation to the Lancaster Local Plan ['LLP'] by each party, the Landowner Group welcomes the production of the 'LLP' to ensure Lancaster City Council has an up-to-date local plan in accordance with the national policy. The Landowner Group supports in principle:

- The proposed Spatial Vision for Lancaster District.
- The Strategic Objectives, Settlement Hierarchy and Development Strategy for the District.
- An urban-focused approach to development supplemented by large strategic greenfield development sites principally on the edge of the regional centre, Lancaster, which are critical to meet development needs.
- Development of Broad Location for Growth: Bailrigg Garden Village, as South Lancaster represents the most sustainable location for strategic development.

Policy SG1: Broad Location for Growth - Bailrigg Garden Village

Support for Bailrigg Garden Village

The Submission Draft Local Plan for Lancaster (LLP) identifies Bailrigg Garden Village (BGV) as a Broad Location for Growth (BLG) (Draft Policy SG1). The Government's designation of the Bailrigg Garden Village in January 2017 is intended to accelerate housing delivery and thereby help address the housing crisis and support local areas. These objectives must be a key strand within the LLP.

The BLG encompasses a large portfolio of land, a substantial proportion of which is under the control of the South Lancaster Landowner Group. Collectively they own /control c.162ha (400 acres) of land within the core of the BLG, lying on the west side of the A6 between Galgate and the southern built up area of the city. Land to the east of the A6 largely comprises the Lancaster University Campus and additional land in the University's ownership.

The South Lancaster Landowner Group has consistently expressed its support for development in South Lancaster, the Broad Location for Growth and Garden Village; this is evident in the Group members' submissions to the City Council in relation to the emerging Lancaster Local Plan. They are keen to work with Lancaster City Council to see delivery of the development as soon as possible.

The land is not within the Green Belt or subject of any environmental protection designations; technical assessments show there are no major physical constraints on the land. It is a key sustainable location and provides a clear and widely recognised opportunity to deliver much needed new housing, employment and other development, playing a significant role in meeting the Council's wider strategic objectives for the district.

In recognition of its strategic importance, it is important that the BLG designation is anchored within the adopted plan.

Key Principles

Draft policy SG1 identifies a range of 'key principles' that will be at the heart of planning and development of BGV. The South Lancaster Landowner Group agrees with those key principles and supports their inclusion within the LLP. They will ensure that the development:

- Is of high quality urban design, creating a sense of place and community for its residents
- Delivers a wide range of market and affordable housing delivered by a range of providers from national housebuilders to self and custom-build properties
- Includes all necessary infrastructure at the right time and in the right place to deliver sustainable growth
- Creates and supports opportunities for sustainable travel
- Supports local and strategic improvements to highways infrastructure
- Includes areas of high quality open space to provide a distinct sense of place
- Is designed to take proper account of climate change and manage water run-off

The South Lancaster Landowner Group agrees that development at the BGV should be comprehensive and coordinated; they have prepared a 'Vision Document' for the BGV to demonstrate how their individual and collective land ownerships are complementary and can contribute towards meeting the housing needs of Lancaster in accordance with that overarching objective and the key principles for the BGV.

Mechanism for Delivery

The members of the South Lancaster Landowner Group are committed to working together and with the City Council to develop the BGV; they support the Housing Trajectory at Appendix E of the submitted draft LLP which shows housing delivery on the site commencing in 2021 and contributing c.1,655 dwellings in the plan period (see also draft policy SP6). In order to achieve those required levels of development, BLG needs to start delivering new homes from 2021. The Landowner Group agrees that this is both desirable and achievable; its members have collectively and separately undertaken significant work to ensure that, subject to obtaining planning permission, there are no insurmountable obstacles to immediate development on land within their own or the Council's control. Early delivery would accord with the Garden Village status which supports the Government's imperative to 'boost significantly' housing land supply.

The Landowner Group recognises that there is significant housing need within the Lancaster District and believe that, in working with Lancaster City Council and Lancashire County Council as highway authority, BLG provides an opportunity to accelerate home building in Lancaster, support the economic growth ambitions of the Council linked to the Lancaster University Health Innovation Campus, and reduce housing pressures across the wider district. They have held a number of joint meetings and also met with Lancaster City Council to discuss an appropriate mechanism for delivery in accordance with the trajectory in the submission draft LLP; not just of residential units, but also of local facilities such as schools, open space and health care provision.

Whilst the Landowner Group is supportive of the work LCC is undertaking to bring the Garden Village forward, the Group questions the proposed policy mechanism of delivery for the Bailrigg Garden

Village primarily through the preparation of an Area Action Plan (AAP). It is concerned that use of an AAP, as currently proposed in draft policy SG1, is likely to result in unnecessary delay to delivery of the Garden Village, preventing development commencing in 2021 and resulting in a higher level of unmet housing need across the district. In order to meet the aspirations and objectives of the LLP it is necessary to introduce a mechanism allowing the ability for appropriate parts of the Garden Village to deliver early and flexibly. This could be achieved through allocation of specific land parcels.

Allocations

The Landowner Group has written to Lancashire County Council to demonstrate its support for the HIF bid submitted on 22 March 2019. It is important that the HIF funding provides and supports accelerated housing delivery across the BGV in a way which is both viable and sustainable.

The technical work undertaken by the Landowner Group includes a Highways Technical Note which demonstrates that it would be possible to bring forward some housing development at BGV in advance of the major infrastructure works that will be delivered through the HIF. In order to maintain the momentum of house building in the District, it would be appropriate to allow development at BGV in advance of the HIF funding and adoption of the SDF (or other suitable policy document), subject to the applicants demonstrating:

- (a) there would be no cumulative severe effects on the highways network;
- (b) the proposals would not prejudice the development of adjacent parcels of land within the BGV; and
- (c) compliance with the key principles of Policy SG1.

The following land parcels are located at the northern end of the BGV; they represent the first logical stage of development as a sustainable urban extension of South Lancaster and integral part of the BGV:

- Land at Lawson's Bridge: the site is the subject of a current application by CEG for c.95 dwellings. Access would be taken from the A6 and facilitate a link to bridge over the West Coast Main Line for access into Whinney Carr and the wider BGV
- Whinney Carr: located adjacent to the urban edge of Lancaster with a long history of being identified as suitable for housing development. Initial phases of development could be accessed from Ashford Road to the north utilising council controlled land with an additional link in due course to the A6 through the Lawson's Bridge site.
- Land at Ashton Road: This site has the capacity for 140 dwellings and was previously identified for allocation at the Preferred Options stage. It is a stand-alone site that is capable of being brought forward separately to provide early delivery of housing.

The Landowner Group agrees that a 'joined up' approach to development is required. They have jointly prepared a Vision Document to demonstrate how land to the west of the A6 could be brought forward for development as part of a cohesive spatial framework for that land.

Amendments to Policy SG1

In order that the LLP is positively prepared and effective in delivering housing development in Lancaster in accordance with its ambitions, the Landowner Group suggests amendments to draft Policy SG1 that will make the plan sound by ensuring that it is positively prepared, effective and in accordance with national planning policy:

- Allocate specific land parcels at Bailrigg Garden Village for development;
- Permit the identified land parcels to be brought forward for development in advance of adoption of the AAP provided that it:
 - is in accordance with the Key Principles of Policy SG1
 - does not result in severe cumulative impact on the transport network; and
 - does not prejudice delivery of development on adjacent land.

Text changes to draft Policy SG1 are attached.

Signed on behalf of:

J Winstanley *D. Thompson*

(John Winstanley)

(David Thompson)

Story Homes Limited

Peel Investments (North) Limited

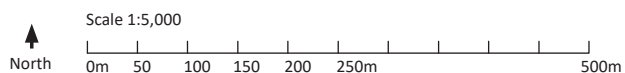
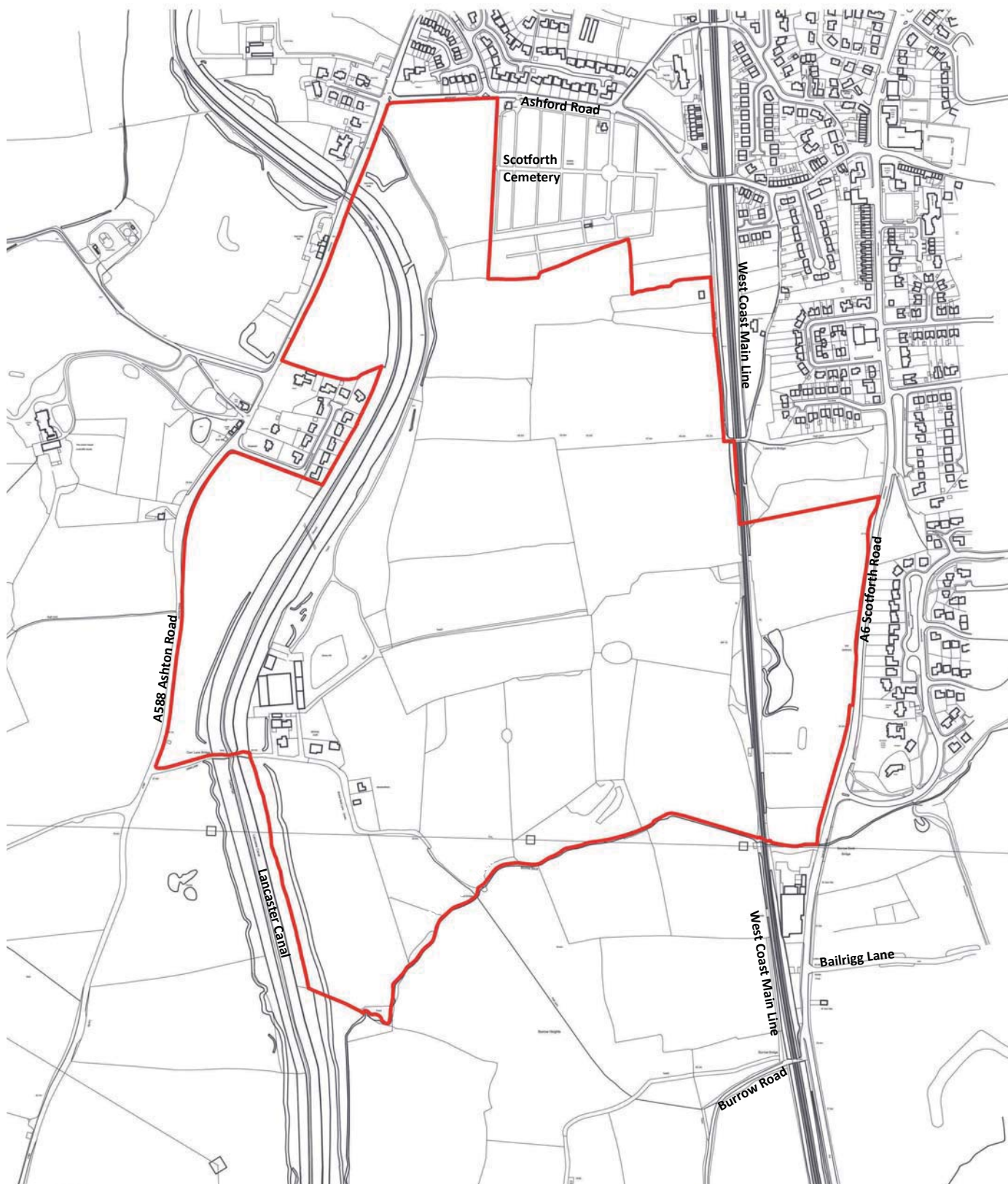
Will Martin
on behalf of CEP
02/04/19
(Will Martin)

Commercial Estates Projects
(part of CEP).



2 April 2019

Appendix 2 Proposed Area for Allocation




**RANDALL
THORP**

LANDSCAPE ARCHITECTURE
ENVIRONMENTAL PLANNING
MASTERPLANNING
URBAN DESIGN

Canada House, 3 Chepstow Street,
Manchester M1 5FW
0161 228 7721 mail@randallthorp.co.uk
www.randallthorp.co.uk

KEY:

 Combined red line boundary

Date: 28.03.19
Drawn by: SR
Checker: SR
Rev by:
Rev checker:
QM Status: Checked
Product Status:
Issue



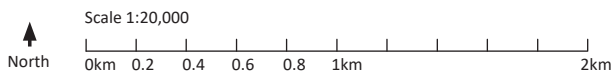
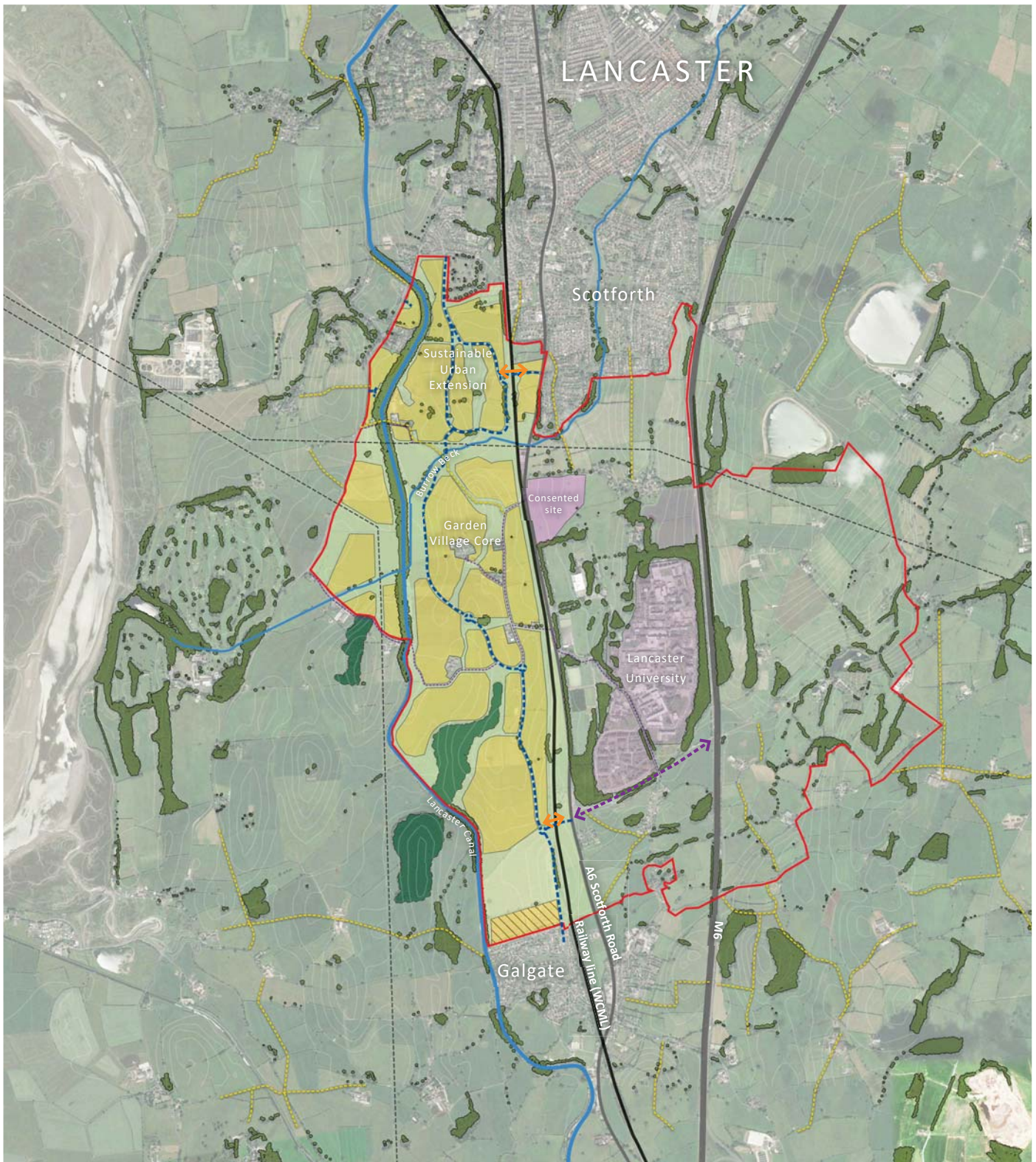
**Whinney Carr,
Lancaster**

Proposed Area for Allocation

Drwg No: 450D-14C

Scale: 1: 5,000 @ A3

Appendix 3 Bailrigg Garden Village Proposed Development Framework Plan



**RANDALL
THORP**

LANDSCAPE ARCHITECTURE
ENVIRONMENTAL PLANNING
MASTERPLANNING
URBAN DESIGN

Canada House, 3 Chepstow Street,
Manchester M1 5FW
0161 228 7721 mail@randallthorp.co.uk
www.randallthorp.co.uk

KEY:

- Broad location for growth/Garden Village (as defined by LCC)
- Existing woodland
- Ancient Woodland
- 5m contours
- Public Rights of Way (PROW)
- Existing pylons

- Proposed primary road
- Existing roads within the site
- Potential urban extension of Galgate
- Proposed Garden Village Development
- University and University related development
- Proposed green infrastructure

- University related consented development site
- Proposed WCML crossing
- Proposed link to M6

Date: 27.03.19
Drawn by: SR/YH
Checker: SR
Rev by: YH
Rev checker: SR
QM Status: Checked
Product Status:
Issue



COMMERCIAL ESTATES GROUP

Bailrigg Garden Village, Lancaster

Illustrative Development Framework Plan

Drwg No: 450C-01G

Scale: 1: 20,000 @ A3

Appendix 4 South Lancaster Vision Document



South Lancaster

Vision Document

April 2019





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Introduction

This Vision Document has been prepared jointly by Commercial Estates Projects Ltd ('CEP', part of CEG), Peel Investments (North) Ltd ('Peel') and Story Homes Ltd (hereby known as the Landowner Group).

All three parties are currently working together to promote the development of key parcels of land within South Lancaster, and more specifically within the Bailrigg Garden Village / Broad Location for Growth which has been proposed by Lancaster City Council.

The Landowner Group's landholdings between Ashton Road and Scotforth Road (A6) cover a large area of land adjoining the southern edge of Lancaster. The development potential of this area has long been recognised by Lancaster City Council (LCC), most recently through its strategy for the Broad Location for Growth / Bailrigg Garden Village in its emerging Local Plan (Policy SG1).

The Garden Village designation is also supported by Central Government, which has made clear that it should result in early, accelerated and uplifted housing delivery. This is very much welcomed and the Landowner Group is keen to ensure that swift progress continues to be made. This Vision Document therefore sets out our latest thinking in terms of the form and delivery of new development within the wider Broad Location for Growth.

The Landowner Group have vast experience of bringing forward high-quality strategic housing and mixed-used developments, with a proven track record of delivery across the country.

The Landowner Group:

- supports in principle LCC's proposed Broad Location for Growth and Garden Village concept and Lancaster County Council's bid to Government for Housing Infrastructure Funding to help unlock the critical major infrastructure needed to deliver the whole Garden Village proposition
- considers it important that the LCC adopts a Local Plan as quickly as possible, to help guide the delivery of new development
- considers it important to establish early, quality development opportunities within South Lancaster; and
- is keen to engage positively with LCC and other stakeholders to see the successful delivery of new development in South Lancaster.

This Vision Document summarises the opportunities that exist.

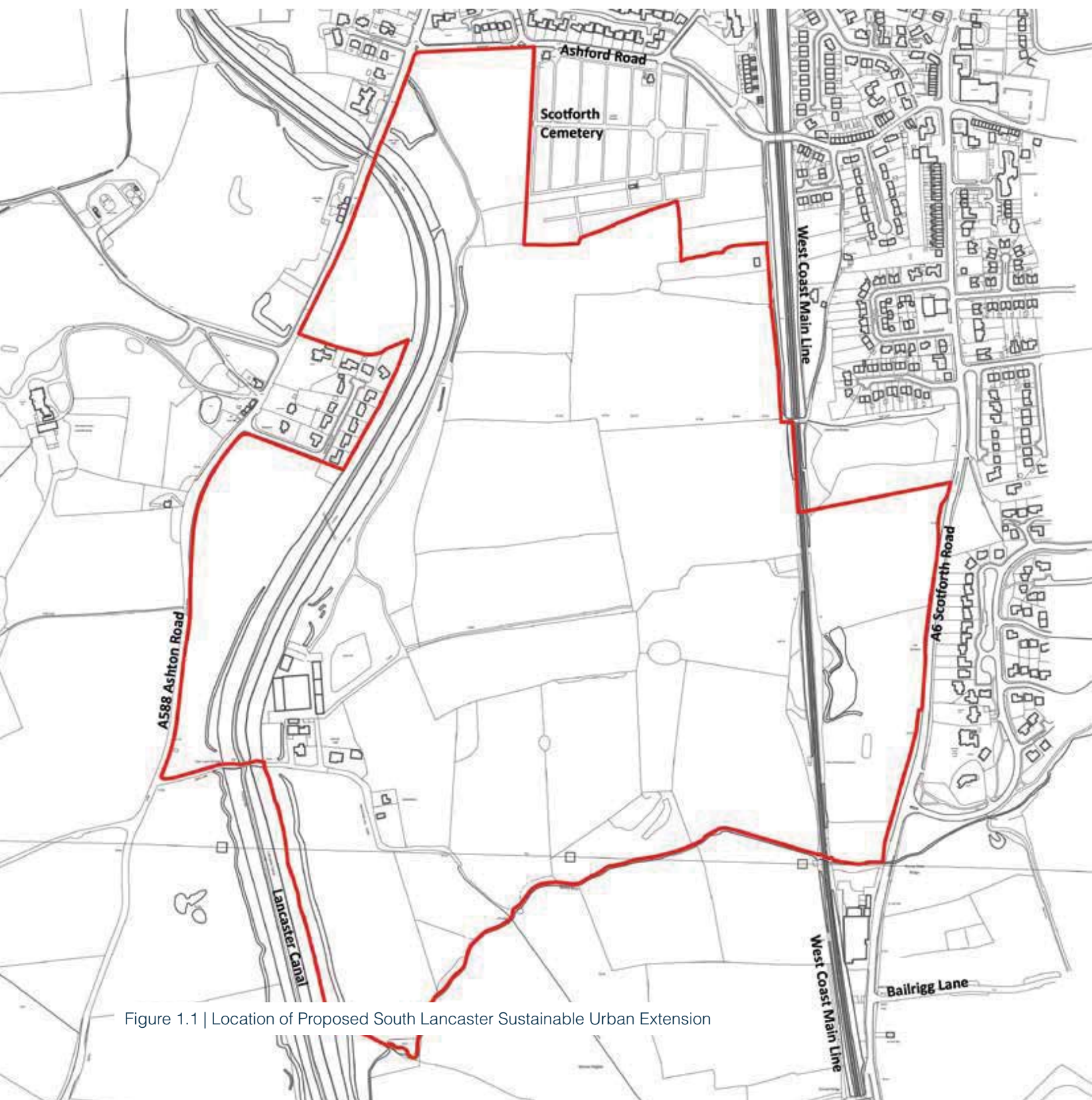


Figure 1.1 | Location of Proposed South Lancaster Sustainable Urban Extension

A Strategy for Early Delivery

The Landowner Group agrees with LCC that South Lancaster offers the most important development opportunity in Lancaster. It occupies a highly sustainable location with good access to, and synergy with, existing facilities. In the draft Local Plan, LCC has indicated that new housing delivery in South Lancaster could begin in 2021/22.

As currently set out in the emerging Local Plan (the Strategic Policies and Land Allocations DPD), LCC's strategy is to identify a 'Broad Location for Growth' in South Lancaster which can accommodate a new residential-led mixed use development, including at least 3,500 new homes. The Landowner Group broadly supports this approach.

However, we believe that there must also be a specific 'first phase' allocation within the emerging Local Plan, relating to the northern extents of the Broad Location for Growth and effectively comprising an sustainable urban extension to South Lancaster within the Garden Village. This area is similar to that identified by LCC as a draft Local Plan allocation in 2012.

This is required to facilitate and ensure earlier delivery to provide the new homes needed and support economic growth ambitions. It could be brought forward without compromise to the principles of the wider Garden Village and secure a high quality of design and layout across the whole area. The wider Broad Location of Growth is shown on the Figure opposite, along with the Landowner Group's illustration as to how development to the west of the A6 could look.

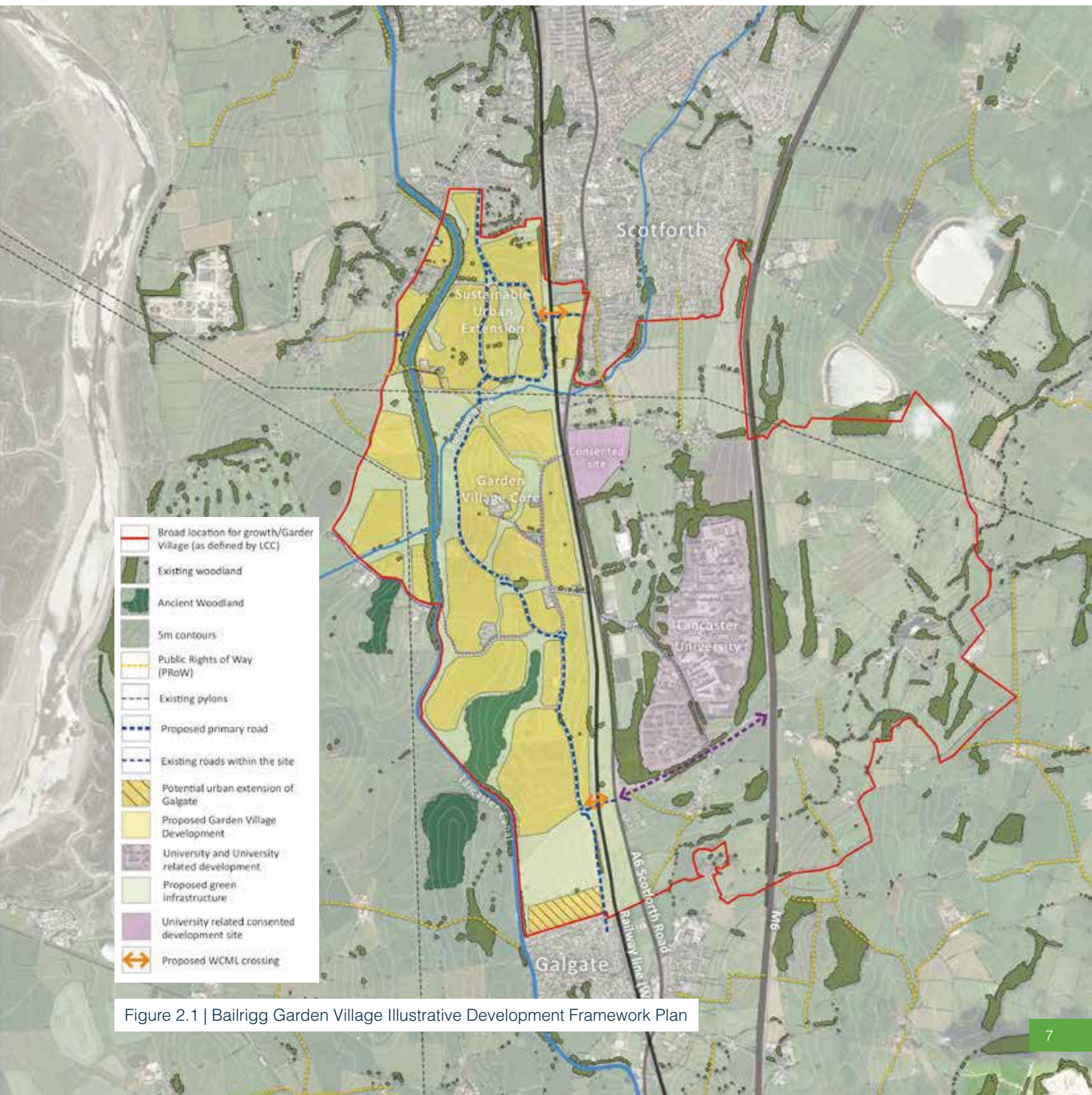


Figure 2.1 | Bailrigg Garden Village Illustrative Development Framework Plan

Site and Surroundings

The Landowner Group collectively control land totalling approximately 168ha/420 acres within the core of the Bailrigg Garden Village 'Broad Location for Growth', as identified at Policy SG1 of the draft Local Plan.

Within this broader area, the proposed Sustainable Urban Extension allocation site which is identified for early delivery at South Lancaster comprises around 148 acres / 57ha. The proposed allocation site is crossed by the West Coast Mainline within its eastern extents, and by the Lancaster Canal towards its western limits. The site is undulating, with field boundaries marked by hedgerows and a number of trees and copses across the site.

The site for the proposed allocation is bounded:

- To the north by Scotforth Cemetery and allotments, with existing residential development, Ashford Road and the urban area of Lancaster beyond;
- To the south by Burrow Beck (which forms part of a green corridor network within the adopted Local Plan), beyond which lies open countryside proposed for latter phases of Bailrigg Garden Village;
- To the east by Scotforth Road (A6), beyond which lie existing residential areas and a range of strategic development sites, including Lancaster Health Innovation Campus, as well as Cinder Lane, part of a Strategic Cycle Network; and
- To the west by Ashton Road, with open countryside beyond.

The site is situated approximately 2.7km/1.6 miles to the south of Lancaster City Centre and close to Lancaster University (which is located approximately 1km/0.6 miles to the south east of the site).

The site adjoins the well-established residential area of South Lancaster, which includes local and neighbourhood shopping, restaurants, public houses and community facilities.

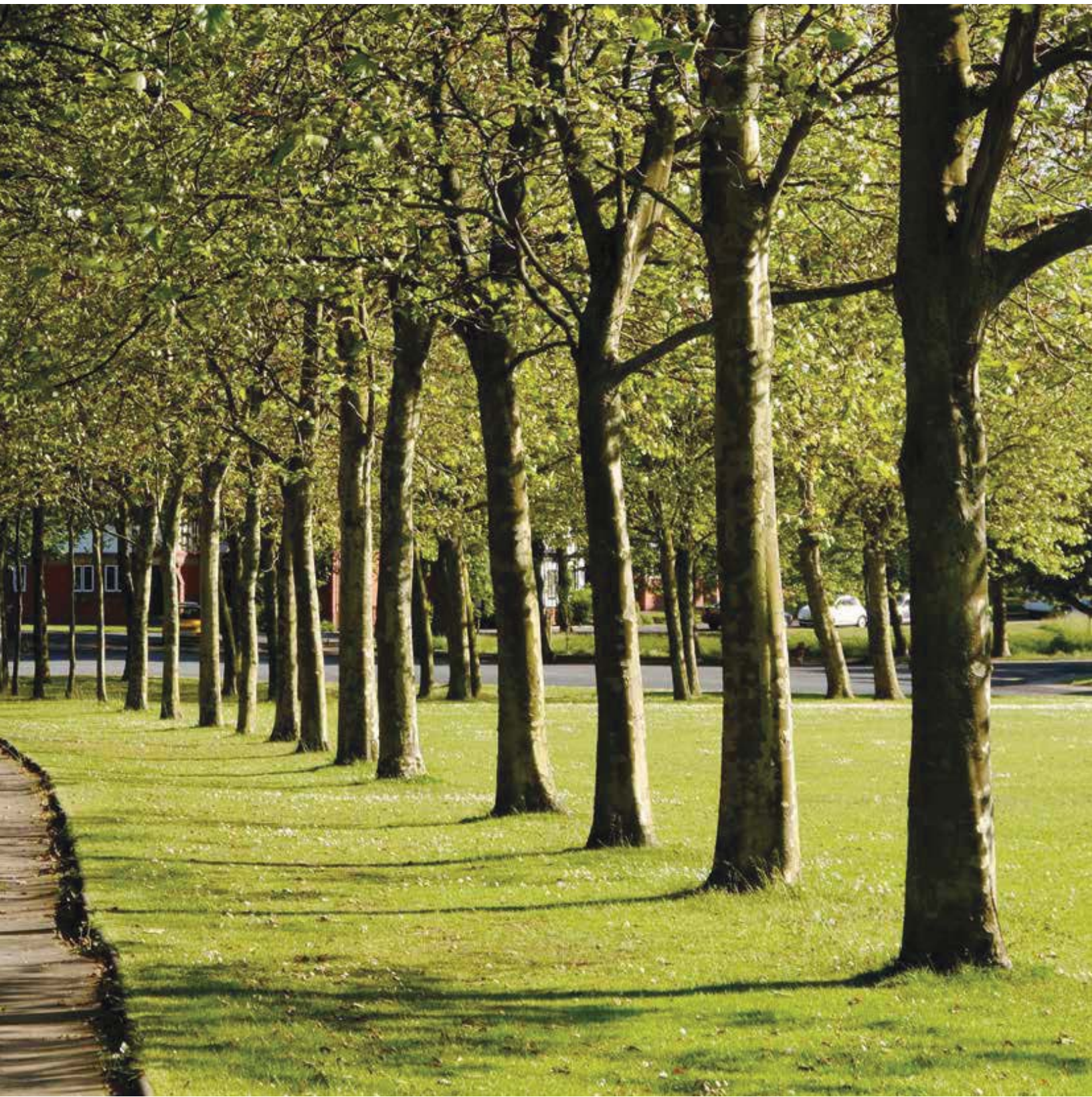
The character and appearance of the surrounding residential area is mixed. In architectural terms, the area includes 18th and 19th century stone houses and terraces, mid 20th century housing and contemporary housing developments.



KEY

- Site Boundary
- Bus Stop
- Park / Playing Fields
- Petrol Station
- Pub / Bar
- Take Away
- Local Shop
- Place of Worship
- Pharmacy
- School
- University
- Community Centre

Figure 3.1 | The Proposed Sustainable Urban Extension Allocation Site and Surrounding Area





“South Lancaster will be an exemplar development, within Bailrigg Garden Village. The Sustainable Urban Extension will be a distinctive community which Lancaster can be proud of, combining exceptional family and affordable housing using the best practice urban design and with an extensive accessible green infrastructure network. Each phase of development will be carefully planned and will integrate with the existing urban area and the wider Garden Village.”



Our Vision

The Landowner Group has undertaken a masterplanning study which shows that the most northerly land within the Broad Location for Growth can be brought forward as a sustainable urban extension to the south of Lancaster without compromising the integrity or wider function of the proposed Garden Village. This reflects the early work undertaken by LCC in identifying options for the design of the development. The majority of the Sustainable Urban Extension site was proposed as such by LCC in 2012, prior to the larger Garden Village proposal coming forward.

It adopts a phased approach to development, distinguishing between a sustainable urban extension to Lancaster (in the northernmost part of the identified Location for Growth) and a new Garden Village community, all delivered according to a common set of principles.

This proposal will facilitate earlier delivery of development, particularly if a northern area can be brought forward through an allocation in the emerging Local Plan.

A subsequent Supplementary Planning Document (SPD) or Action Area Plan (AAP) produced by LCC could then be focussed more specifically upon the wider Garden Village. The 57ha/140 acre northern site would deliver circa. 1,200 new homes, affordable housing, a green infrastructure setting, recreational facilities, a new local centre and, if needed, land for a new primary school.

It could also open up access to the Lancaster Canal corridor from the east, through the creation of a new cycleway and accessible green spaces; forming a blue and green corridor running through the development.

The Masterplan area is based on the Broad Location for Growth area - as defined by Lancaster City Council. This includes the land owned by CEG, Peel and Story Homes and other landowners, including the City Council and the Lancaster University. The successful delivery of the whole Masterplan vision will inevitably require the involvement and agreement of a number of landowners and stakeholders. The City Council will have a lead role in this.

The illustrative masterplan has been designed around three guiding principles of People, Place and Movement. It will be developed and refined through consultation with Lancaster City Council and Lancashire County Council and other key stakeholders.



People	Place	Movement
A range of housing Circa. 1,200 new homes with an emphasis on family and affordable housing - providing a mix of housing types and tenures.	An aspirational place Strong place-making and high quality landscape features which provide an attractive neighbourhood with unique character.	Modal shift A sustainable new community which will promote positive modal shift through design - reducing reliance on private car use.
Economic growth Direct and indirect economic benefits which will support and drive economic growth, including through their proximity to, and synergy with, Lancaster University.	Habitat creation and protection Retention of valued habitats and enhancement of biodiversity resources via green infrastructure, wetlands and hedgerow tree planting.	Public transport The layout will offer enhanced and new bus service routes to maximise local take-up and also enable the Council's future plans for a Bus Rapid Transit ('BRT') system for the wider Garden Village.
Social infrastructure Services and facilities which meet local needs including land for a primary school (if necessary), local centre, green infrastructure, formal playing pitches and children's play spaces.	Sustainable drainage A comprehensive SUDS network which provides robust flood protection and management.	Connections Direct access to key arterial transport routes, including Scotforth Road (A6) and Ashton Road (A588).
Health and well-being New access to a substantial network of leisure and recreational areas.	Sustainable energy Exploration of renewable energy generation and sustainable construction to minimise carbon impact.	Footpaths and Cycleways Enhancement of the local network of public rights of way, footpaths and cycleways.

A Masterplanned Approach

Bailrigg Garden Village has Government support and is targeted at accelerating housing delivery in Lancaster, within a quality setting.

The Landowner Group have developed an Illustrative Masterplan for their sites (and certain adjoining land - which has already been included within the Council's Broad Location for Growth) to demonstrate how the design and form of development will respond sensitively to the characteristics of the site and the wider area.

It is expected that the South Lancaster Sustainable Urban Extension will be allocated for development, and then brought forward through the planning application process which would follow.

All stages of development (applications and plan-making) will involve comprehensive public consultation on the detailed proposals as they come forward.

The development will be planned with best practice for urban design and green infrastructure in mind, in order to deliver a family friendly residential area appropriate to its location. The site layout will seek to retain, protect and enhance key features in the landscape and incorporate them into the development for the benefit of existing and future residents and wildlife.

The layout and design of buildings will seek to complement the existing urban areas to the north and the proposed wider Garden Village to the south.

The illustrative Masterplan demonstrates that the Sustainable Urban Extension can deliver approx. 1,200 dwellings at a density of around 35 dwellings per hectare, together with land for a potential primary school and local centre. Family housing ranging from 2 to 5 bedrooms will be provided, a proportion of which will be affordable housing. House types may include terraces, semi-detached and detached dwellings.

Housing will be designed to reflect the local character and distinctiveness of the area with traditional building forms incorporating the range of materials currently found in the area but detailed to create a distinctive local character. Housing will be predominantly 2-storey, with some 2½ and 3 storey buildings used to create visual interest in focal areas.



Figure 5.1 | South Lancaster Sustainable Urban Extension Illustrative Masterplan



A Masterplanned Approach

Fundamentally, the illustrative masterplan is in accordance with the key principles of the Garden Village/Broad Location for Growth as set out by the Council in its draft Policy SG1 of the emerging Local Plan, and will be based upon the following design concepts:

Connections

Linkages to all key destinations including local amenities, Lancaster University, the Lancaster Canal and the city centre, and also the wider Garden Village to the south will be created to ensure the integration of the development with the adjacent areas.

Views and vistas

Parkland will be developed on high land at the heart of the site to maximise the potential for views out from public spaces and to enable the creation of a soft skyline in views towards the site.

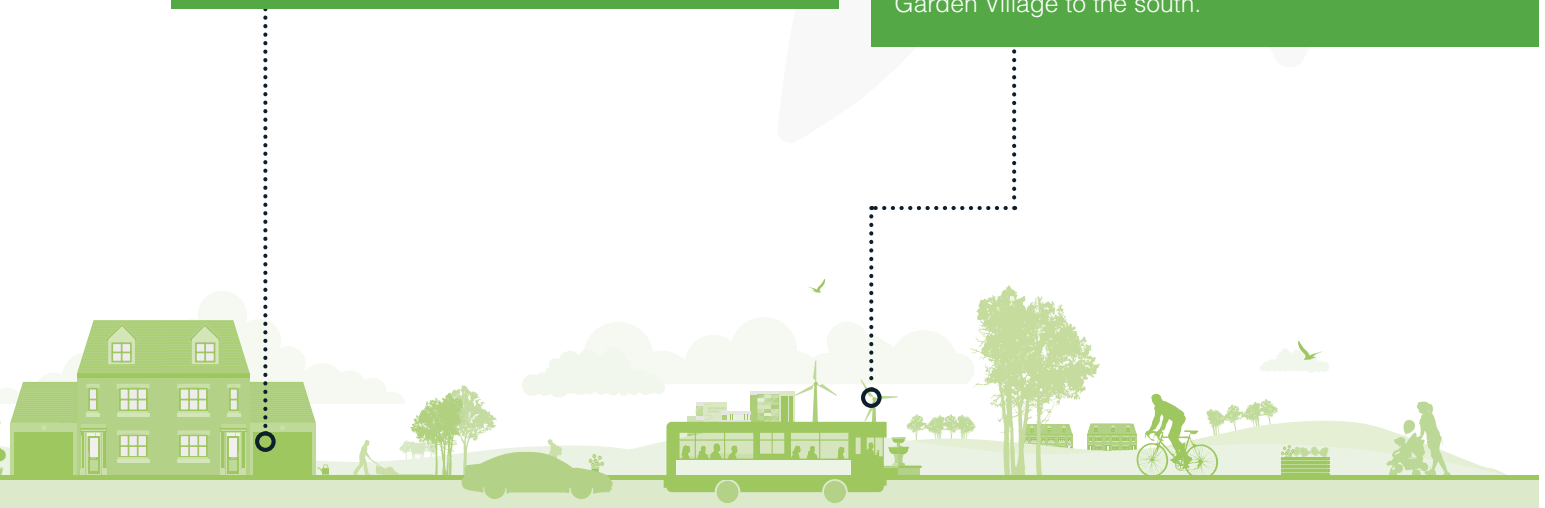


Local character

Existing hedgerows, trees, stone walls, small woodlands and other local landscape features will be retained, where practicable, to lend character to the development and guide the alignment of spine roads. Traditional building forms combined with careful choice of elevational materials and attention to urban layout will be used to create a sense of place and encourage modal shift.

Green Infrastructure

A linked network of multifunctional greenspace will be laid out which responds to topography and existing landscape elements, provides a setting for pedestrian and cycle movement around the site, and an appropriate interface with the wider countryside. A distinct area of separation will follow the general route of the Burrow Beck (which demarks the site's southern boundary), separating the development from the wider Garden Village to the south.



Site Suitability

The Sustainable Urban Extension site is the most appropriate location for early phase development within the 'Broad Location for Growth' for Bailrigg Garden Village, and should therefore be the priority site for release in order to meet the District's housing requirement and other social, economic and environmental objectives.

The Landowner Group fully recognise that wider infrastructure needs to be planned for and delivered to achieve the delivery of the wider Garden Village (including strategic highway infrastructure), and acknowledge the need for further work in this respect.

However, the Group has collectively already prepared an extensive and comprehensive evidence base supporting the release of their sites. This includes technical reports in respect of highways and transport capacity, landscape and visual impacts, and ecological assessments.

In addition, a large part of the site, known as 'Whinney Carr', was previously the subject of a planning application for 535 dwellings in 2000 (application ref. 98/01207/OUT). The Council supported this application, as did a Planning Inspector following call-in, however it was ultimately refused by the Secretary of State in light of changes at that time to the housing requirement set out within Regional Planning Guidance.

The Inspector's 2002 Report on the scheme concluded that the site is well-placed to be a sustainable urban extension in terms of access to jobs and social infrastructure.

More recently, the majority of the Sustainable Urban Extension site has been identified in a number of Council studies on suitable housing sites, as a draft Urban Extension allocation, including in a draft of the Local Plan in 2012 and now as a part of a wider Broad Location for Growth and Garden Village designation.

Availability	Suitability	Achievability
<p>Much of the site is available for development immediately.</p> <p>CEP has now submitted an outline planning application for the development of up to 95 residential dwellings on the eastern portion of the site, as well as a link road which will facilitate longer term access across the West Coast Mainline to the Whinney Carr site.</p> <p>Story Homes also have development proposals relating to around 140 new dwellings on the western parcel of land between Ashton Road and Lancaster Canal.</p> <p>Working in conjunction with LCC, a first phase access to Peel's Whinney Carr site could be provided to Ashford Road - thereby bringing forward early delivery on this site.</p> <p>Residential development on the Whinney Carr site is a longstanding and well known proposition and would now form the proposed Sustainable Urban Extension.</p>	<p>The site is largely contiguous with the built-up area of South Lancaster and is functionally and perceptually linked to this existing well established residential community. It benefits from a highly sustainable location on a strategic transport corridor, and is situated within close proximity to existing residential and commercial areas, with a number of shops and services located a short distance to the north.</p> <p>The Council's 2015 Strategic Housing Land Availability Assessment also identifies land at Whinney Carr (ref. 341), which includes the majority of the collective site, as being potentially suitable for residential development, with a capacity for up to 900 dwellings. Detailed technical assessments prepared by LCC and the Landowner Group have demonstrated that there are no physical or environmental constraints to development.</p>	<p>The Landowner Group are willing and keen to work together and with other stakeholders to deliver housing development on their sites without delay. This is reflected in the recent submission of a planning application for up to 95 dwellings and a link road through CEP's part of the site. In addition, the Council's evidence base also supports the delivery of land at South Lancaster in the short term.</p> <p>In particular, the Transport Assessment prepared by WYG for the Council suggests that a large part of the northern site is capable of being delivered in the short term, without giving rise to severe harm to the local highway network or necessitating the delivery of any 'strategic' longer term highways improvements. This is supported by further analysis, undertaken by Bryan G Hall on behalf of the Landowner Group, which has found that initial development can be delivered without the need for the strategic infrastructure tied to the wider Garden Village proposals and HIF Funding bid.</p>

Infrastructure

CEP, Peel and Story Homes are three of the UK's leading landowners and developers, with a track record of bringing forward and facilitating high quality and sustainable residential and mixed use schemes.

The sustainable urban extension / first phase of the Garden Village proposed in the northern part of the Broad Location for Growth will provide new infrastructure to ensure that the neighbourhood is sustainable, has access to day to day services and facilities, and is capable of successfully integrating with and complementing the existing community.

Large sites, like the Sustainable Urban Extension, have the 'critical mass' to provide for much needed new infrastructure. They can be positive for local communities, bringing real and tangible benefits. The proposed Sustainable Urban Extension could provide a range of benefits and opportunities - as set out in this Vision Document.

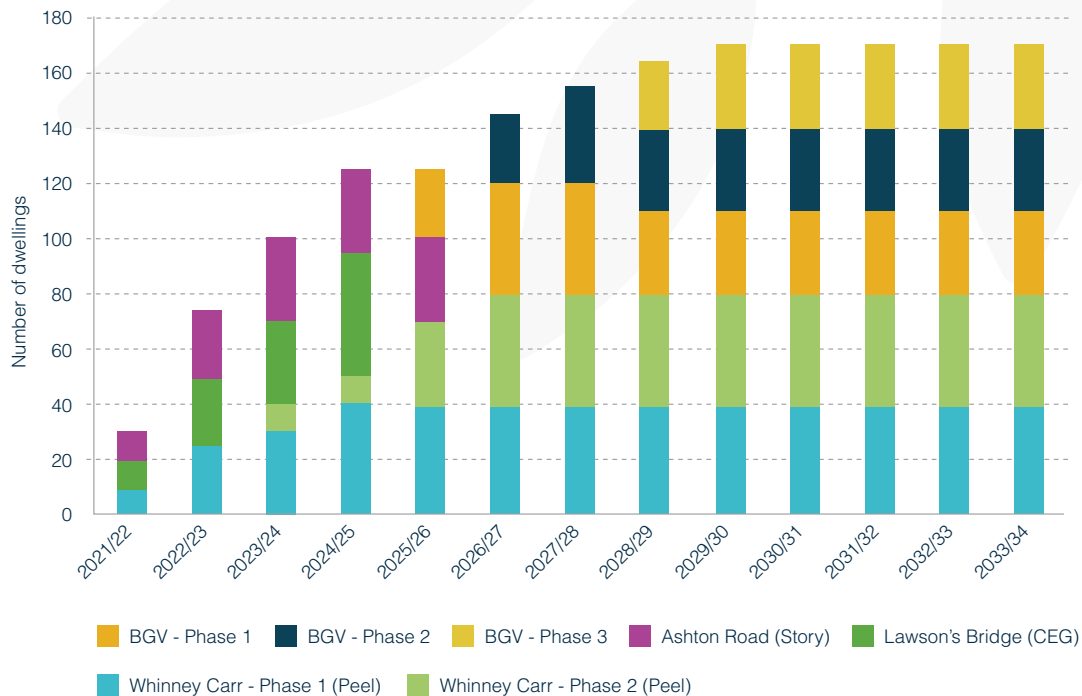


Delivery

The Landowner Group has extensive experience in delivering large scale, strategic developments. They are supported by specialist teams with a proven track record in bringing forward major development proposals and are committed to deliver the Sustainable Urban Extension as part of an early phase of the overall BGV.

The majority of the proposed allocation site lies within the ownership or control of the Landowner Group and LCC and can be made available for immediate development.

The development will consist of a number of development phases. The involvement of several developers enables new homes to be delivered simultaneously from multiple outlets. Following the allocation of the site, and allowing for appropriate lead in time to secure necessary planning permissions and prepare the site for development, it is anticipated that the phased approach proposed could see significant delivery within the first five years of the plan period i.e. from 2021 onwards. LCC have acknowledged this potential and timescale in their draft Local Plan.



Benefits

The South Lancaster Sustainable Urban Extension provides a unique opportunity to create an outstanding and sustainable community which enhances the local area and provides much needed new homes, recreation / leisure,

and employment opportunities. Its accessibility and synergy with neighbouring strategic sites can underpin sustainable growth in the area, whilst accelerating housing delivery.



£170m

Construction Value

(temporary jobs p.a. over the build period)



£14.6m GVA

Economic Output

(additional GVA p.a.)



130 Jobs

Construction Jobs

(temporary jobs p.a. over the build period)



195 Jobs

Supply Chain Jobs

(indirect / induced 'spin-off' jobs supported p.a.)



£6.8m

First Occupation Expenditure

(spending to make a house 'feel like home')



£5.5m

Resident Expenditure

(within local shops and services p.a.)



235 Jobs

Supported Jobs

(from increased expenditure in local area)



£1.8m

Council Tax Revenues

(p.a.)



£5.7m

New Homes Bonus Payments

(over a 4 year period)



Appendix 5 Highways Technical Note

BRYAN G HALL

CONSULTING CIVIL & TRANSPORTATION PLANNING ENGINEERS



Lancaster Local Plan Transport Review in the Context of Bailrigg Garden Village

Technical Note

February 2019

BAILRIGG GARDEN VILLAGE
LANCASTER

COMMERCIAL ESTATES PROJECTS (CEP)
& PEEL INVESTMENTS (NORTH) LIMITED

**LANCASTER LOCAL PLAN TRANSPORT REVIEW IN THE
CONTEXT OF BAILRIGG GARDEN VILLAGE**

Report by Andrew Cooper

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2023 DS Junction Analysis (without and with Booths)

Appendix BGH19

Junction Analysis Summary Table

1.0 INTRODUCTION

1.1 This Technical Note (TN) has been prepared by Bryan G Hall (BGH) on behalf of Commercial Estates Projects (CEP) and Peel Investments (North) Limited (Peel).

1.2 This TN reviews the transport evidence base prepared by consultants White Young Green (WYG) on behalf of Lancaster City Council (the Council) in respect to their emerging Local Plan (LP). The LP sets out the Councils strategy to guide development in the Lancaster District for the next 15 years and is likely to be subject to Examination in Public (EiP) commencing April 2019.

1.3 The transport evidence is presented in two documents prepared by WYG in December 2018, namely: -

- ‘Lancaster Local Plan – Transport Assessment Part 1 – Initial Assessment’, and;
- ‘Lancaster Local Plan – Transport Assessment Part 2 – Identification and Assessment of Mitigation Measures’.

1.4 The Part 1 WYG report assesses, in high-level terms, the existing capacity of the highway network and its ability to accommodate additional traffic which is expected to be generated by natural background traffic growth, committed developments and emerging proposed LP allocation sites.

1.5 The Part 2 WYG report builds upon the findings of the Part 1 report and considers in further detail, a series of highway improvement schemes at key junctions, which are deemed to require intervention in the future to allow the Districts growth aspirations to come forward.

Purpose of this Report

1.6 The purpose of this report is two-fold. The first substantive part of this TN specifically comments on the approach and conclusions reached by WYG in respect of the two parts of the Transport Assessment (TA). The BGH review will critique the adopted technical approach and the relative merits of the WYG study having regard to the EiP process.

1.7 The second part of this TN focuses on CEP’s and Peel’s land holding interests in south Lancaster, an area identified by the Council for significant future growth in the District, and how the Councils transport evidence base prepared by WYG compliments the early delivery of both sites.

- 1.8 The latter section of this report is effectively a condensed TA which identifies the impact of traffic generated by the CEP and Peel sites (both individually and in combination) having regard to the Councils evidence base and with a focus upon operational junction analysis.
- 1.9 This report will present a case to demonstrate the quantum of development which could come forward as part of a first phase, prior to more significant highway intervention in south Lancaster, as proposed in the Councils and County Councils Housing Infrastructure Fund (HIF) bid.
- 1.10 The CEP site is triangular in shape and situated some 2.8 kilometres to the south of Lancaster city centre. The CEP site is bounded to the north by the Lawson's Bridge development site which benefits from planning permission for a food-store by operators Booths (yet to be constructed) and Rays Drive which demarcates the current extent of the south Lancaster residential area, to the east by the A6 Scotforth Road, to the south by a small area of agricultural land, beyond which is the Burrow Beck watercourse and the site known as the 'Filter House' (which is in the process of being developed for student accommodation) and to the west by the West Coast Mainline (WCML).
- 1.11 Peel control a large parcel of land (circa 111 acres) to the west of the WCML which is known locally as 'Whinney Carr'. The site is bounded to the north by Ashford Road and the Scotforth Commonwealth War Cemetery, to the east by the WCML and beyond that the A6 Scotforth Road, to the south by agricultural land (the boundary being Burrow Beck and Carr Lane) and to the west, in part, by A588 Ashton Road which is an alternative link to Lancaster city centre.
- 1.12 Both the CEP and Peel sites form a significant part of the proposed Bailrigg Garden Village (BGV), a new self-contained settlement of around 3,500 homes in south Lancaster and a vital part of the Councils development aspirations as identified in the emerging LP. Both sites are considered appropriate for early development and would constitute the first phase of the delivery of the BGV, representing a logical urban extension / location for new development in south Lancaster. A location plan highlighting both development sites in the context of the local and strategic highway networks is attached at **Appendix BGH1**.
- 1.13 In terms of access to these sites, it has long been established that the CEP site would take access directly from the A6 Scotforth Road and would ultimately provide a route across the WCML, via a new bridge link, to facilitate access to the Whinney Carr site. This access strategy fits with the Councils aspirations for the BGV. However, and in the immediate term, the Peel site would deliver a link to Ashford

Road to the north, which is likely to be delivered prior to construction of the bridge link across the WCML.

1.14 In order to evidence the analysis undertaken within this report, AM and PM peak period traffic surveys were commissioned by BGH on behalf of CEP and Peel in November 2018. Where relevant, this data is referred to in detail, in the following sections.

1.15 The remainder of this TN is structured in the following sections:-

Table 1.1 – Technical Note Report Structure

Section	Title	Description
2.0	Review of WYG Evidence Base	This section reviews parts 1 and 2 of the WYG evidence base and the relative merits of the study in respect to the EiP process.
3.0	Early Delivery of Development from CEP and Peel Sites	This section identifies the level of development which could come forward on both sites having regard to key constraints on the highway network in advance of significant highway intervention in south Lancaster.
4.0	Summary & Conclusions	This section presents the conclusions drawn from the review and analysis contained within this report.

2.0 REVIEW OF WYG EVIDENCE BASE

Introduction

- 2.1 As detailed by the Council in respect to the LP Transport Evidence Base and set out in the Introduction of this TN, consultants WYG were commissioned to prepare a TA for the District. This evidence was made available in December 2018 following submission of the Councils LP for Examination on 15th May 2018.
- 2.2 Part 1 of the WYG assessment (LP document TR_02) identified key congestion points / junctions within the district which were, with specific regard to south Lancaster and the BGV:-
- Northbound along the A6 Corridor between Junction 33 and Lancaster City Centre in the AM peak; and
 - Southbound on the same corridor in the PM peak.
- 2.3 Further to the initial study, Stage 2 of the WYG assessment (LP document TR_03) sets out a range of potential mitigation measures and junction improvements which seek to address, as best as possible, the identified highway capacity constraints.
- 2.4 The WYG assessment considered a number of potential improvements, specifically in respect to south Lancaster and the A6 corridor between Galgate and Lancaster city centre and concluded that the level and type of intervention identified was broadly appropriate in the context of the emerging growth aspirations, and that the short to medium term improvement schemes, did not rely on land outside the public highway to deliver them.
- 2.5 The improvement schemes are however recognised as short term interventions and the Council expects that longer-term measures will be required, including major new infrastructure and greater emphasis and provision in respect of sustainable travel modes which would include the reconfiguration of J33 of the M6 and a new strategic spine road, Bus Rapid Transit (BRT) system and a pedestrian / cycle super-highway (all included within the HIF bid).
- 2.6 Indeed this is further highlighted in respect to south Lancaster at paragraph 1.3.5 of the Part 1 TA which states that: -

“...Additional transport-based evidence is being worked up for Bailrigg Garden Village through preparation of the Lancaster South Area Action Plan DPD and separate TAs will need to be prepared for each site if and when these are brought forward in the future when the precise nature and size of

proposed development is known. Where required appropriate mitigation measures will need to be developed”.

- 2.7 Aligned with the above, it is also stated in the Transport Studies (TS) section of the LP web page, that the WYG work is an independent view on behalf of the Council, separate to Lancashire County Council (LCC) who are the local Highway Authority for the District. It is recognised by the Council therefore that there may be:-

“...more suitable forms of mitigation taking account of the wider considerations of land-ownership, air quality and maximising sustainable transport movements across the network”.

- 2.8 Evidence of this from LCC in respect to the LP aspirations and south Lancaster are set out in the following documents and referred to within this TN where relevant:-

- District of Lancaster – Highways and Transport Masterplan (LP document TR_01); and
- Lancaster District Local Plan - Infrastructure Delivery Schedule Update December 2018 (LP document VI_03).

- 2.9 The documents referred to above can be found on the Councils LP evidence, monitoring and information web page at:-

<http://www.lancaster.gov.uk/planning/planning-policy/evidence-monitoring-and-information>

Review of WYG Transport Assessment – Part 1

- 2.10 Paragraphs 1.3.1 to 1.3.5 set out the limitations of the WYG study. The approach taken by WYG is that of a ‘...traditional approach’ in the absence of an up to date area wide Strategic Transport Model (STM). WYG accept that a STM would allow the LP aspirations and potential highway infrastructure schemes to be tested more accurately and under a number of ‘...what if’ scenarios.
- 2.11 BGH agree with this statement, however, and as per paragraph 1.3.3, the adopted WYG approach represents a ‘...worst-case’ situation and in reality, network conditions are likely to be better than reported. This is particularly true in the short term to medium term. The development of a STM when predicting long term impacts of the LP, i.e. towards the end of the plan period of 2033 and beyond is supported.
- 2.12 Paragraph 2.1.5 defines the assessment scenarios. The traditional AM and PM peak periods have been concentrated upon for the interim periods of 2023 (some 5 years

post production of the Councils evidence base) and 2033 (which is understood to be two years post the final year of the LP). These assessment periods are supported in the context of residential, employment and retail development.

- 2.13 The AM and PM peak 2023 and 2033 'Do Minimum' (DM) scenarios are defined as including locally adjusted Temprow growth factors, applied to the base year traffic flows (which are understood to have been counted or obtained from other assessments in 2017 and 2018) and 'Committed' development schemes, i.e. those with the benefit of planning permission but not yet implemented in addition to those which are 'likely' to receive planning permission shortly (as agreed with the Council and detailed at Table 4.1 of the WYG report).
- 2.14 The AM and PM peak 2023 and 2033 'Do Something' (DS) scenarios include the DM traffic, in addition to the traffic estimated to be generated by the emerging LP allocation sites. These developments are detailed at Table 4.2 of the WYG report and include, with specific regard to the BGV:-
- A draft allocation for some 1,650 dwellings (in total) across the Garden Village site (ref: Site 1) of which the CEP and Peel sites combined could deliver some 1,100 dwellings (estimation based on developable areas); and
 - A draft retail allocation of 3,500 sqm to be located within the Garden Village site (ref: Site 63).
- 2.15 As detailed within the introduction, BGV is expected to deliver a new self-contained settlement of around 3,500 homes in south Lancaster. The further development (of some 1,850 dwellings) is understood to be part of the Councils housing strategy beyond the plan period of 2033 and as such this additional quantum has not been considered as part of the WYG work. This additional level of development further supports the need for a STM.
- 2.16 With respect to the CEP and Peel sites in relation to south Lancaster, the WYG TA study area includes a number of junctions on the A6 corridor from, Galgate in the south to Lancaster city centre in the north, including the A588 Ashton Road / Caspian Way mini roundabout to the west. The peaks for the network are identified in Table 6.1 of the WYG report as 7:30 to 8:30 am and 4:30 to 5:30 pm. These periods generally accord with the known peaks on the network and as such there is agreement in respect to these chosen periods.
- 2.17 Paragraph 6.3.3 sets out the rationale for Temprow growth. The approach generally accords with good practice guidance for assessing the transport implications of development, however, given the inclusion of some 23 committed development

sites and a further 8 schemes which are likely to receive planning approval in the near future, the WYG approach is considered to be overly cautious.

- 2.18 Despite an attempt to discount committed schemes as much as possible to avoid the ‘...double counting’ of trips, the analysis still includes the full projection with respect to employment growth resulting in typical background growth rates of 7% for future year 2023 assessment and upwards of 16% for future year 2033 assessment (both peak periods).
- 2.19 To put these growth percentages in context, the WYG TA details at Figures 1 and 2, total two-way vehicle flows on the A6 corridor (to the south of the Hala Road junction in the vicinity of the CEP site) of 1,410 in the AM peak hour and 1,514 in the PM peak hour. BGH commissioned surveys from November 2018 (detailed later within this TN) recorded total two-way observed flows on the A6 (same location) of 1,479 in the AM peak hour and 1,469 in the PM peak hour. Given flows of these magnitudes, even in the absence of committed development, the background traffic growth rates represent an additional 250 total two-way vehicle trips on the A6, which is significant in the networks current context and unlikely to be realised in full.
- 2.20 Further evidence to support this view is attached at **Appendix BGH2** in respect to data obtained from the opensource DfT website (<https://www.dft.gov.uk/traffic-counts/>) for a permanent Automatic Traffic Counter (ATC) located on the A6 corridor (Counter ID: 77822) to the immediate south of Lancaster University.
- 2.21 Counts were undertaken by the DfT in years 2002 to 2003, 2005 to 2006, 2008, 2010 and 2015 and demonstrate that growth on the A6 corridor is, as expected, variable year on year, but minimal overall, with a relatively flat growth profile on the A6 corridor. Although this maybe, in part as a result of other factors, i.e. peak spreading etc, it is considered on the whole unrealistic to assume that traffic flows on the A6 corridor will grow in line with traditional linear projections.
- 2.22 Given the above, it is considered that the WYG approach is overly cautious and is likely to have underestimated the true levels of capacity within the highway network (in the absence of any mitigation measures) which could be utilised in the short term, prior to the significant mitigation, as set out by the LCC Transport Masterplan and Infrastructure Delivery Schedule.
- 2.23 Table 6.4 details ‘Committed Development’ schemes accounted for within the WYG analysis as agreed with the Council. With specific respect to significant generators on the A6 corridor, these are:-

- Land for the Proposed Bailrigg Business Park (Phase 1 of Lancaster University Innovation Campus) - 8,115 sqm of B1 (Employment Site ref: 40); and
- Land at Scotforth Road, Lancaster (New Booths Superstore) - 2,052 sqm of A1 (Retail Site 62).

- 2.24 In order to understand the traffic impact of the above developments, WYG have obtained the agreed development flows from the approved TA's. It is however noted that the mitigation scheme for the A6 Scotforth Road / Ashford Road / Hala Road traffic signal controlled crossroads junction, conditioned as part of the Booth's planning permission has not been accounted for in either Stages of the WYG TA work. Both the Booths scheme traffic and associated junction improvement have a significant bearing on any analysis at this junction with respect to the impact of emerging LP sites and these implications are considered further with this TN.
- 2.25 With respect to the remaining phases of the Lancaster University Innovation Campus, it is noted that WYG assume the land use will be that of B1 office type development with traffic generation assumptions adopted as per the historic TA for the site. It is understood, however, as per published information on the University website, that the Campus will focus on "*...healthcare transformation and innovation*" and as such is likely to be significantly less traffic intensive in reality set against what the adopted WYG approach would suggest. Again, although cautious, the assumptions are likely to underestimate existing capacity in the network in respect of early delivery of development in south Lancaster.
- 2.26 Table 6.5 details the quantum and levels of traffic expected to be generated by the emerging LP allocation sites. With respect to BGV, the table details a total development size of 1,650 dwellings which WYG estimate would generate some 881 and 870 total two-way traffic movements during the AM and PM peaks respectively. This level of traffic equates to a total trip rate per household of 0.534 and 0.527 as detailed in Appendix D of the Stage 1 report.
- 2.27 The WYG development trip rates have been derived on the basis of the industry standard assessment tool the 'TRICS' database. BGH have undertaken a comparative exercise for residential development, also using TRICS with the outputs at **Appendix BGH3**. The BGH assessment derives total trip rates per household of 0.549 and 0.524 for the AM and PM peak respectively. These rates are almost identical to the WYG rates and as such are considered appropriate.

- 2.28 With respect to 'other' uses on the BGV site, the WYG TA states that:-
- "...Potential 'other facilities' e.g. schools; convenience shops; health and community facilities; etc assumed to generate mostly internal trips from the residential development within the future Garden Village during peak hours and therefore it is assumed that there is negligible new trips on the external road network in connection with these uses".*
- 2.29 BGH would agree with the above statement, however, it is noted that a modest level of development associated with other potential BGV facilities has been assumed by WYG, with a food-store of some 2,000 sqm gfa on the wider BGV site predicted to generate 141 and 351 total two-way trips in the AM and PM peaks respectively. Although some traffic is likely to be new to the network, industry accepted evidence indicates that a considerable proportion of new food-store traffic (circa 90%) is likely to already be using the highway network and will transfer or divert from other existing outlets. Again the assumption by WYG is therefore considered overly cautious and could further impact upon the ability of the network to accommodate early delivery of development in south Lancaster.
- 2.30 Development trip distribution and assignment of LP sites has been undertaken on the basis of Travel to Work Data (dataset WU03EW) from the 2011 Census and, in the absence of a strategic model, applied to the highway network on the basis of current Trafficmaster data. This analysis is set out at Appendix E of the WYG TA and is considered appropriate in respect of the BGV.
- 2.31 With respect to vehicular access to the BGV site, Appendix E (Plan 5) of the WYG TA assumes two points of access, one from the A6 Scotforth Road to the south of the existing built up area of south Lancaster (in the broad location of the proposed Booths food-store) and a further access from the A6 in the vicinity of Hazelrigg Lane. The matter of access and the CEP / Peel sites is detailed further in the following section.
- 2.32 Table 7.1 and Appendix F detail the validation process with respect to a number of key junctions, based on the Red, Amber, Green (RAG) system. Junction models have been prepared in stand-alone assessment packages such as LINSIG and the TRL Junctions 9 programme with respect to PICADY and ARCADY modules for priority junctions.
- 2.33 Having regard to the CEP and Peel sites and the key areas of known concern, the A6 (Main Road) / Stoney Lane / Salford Road signal junction ('Galgate') is modelled by WYG to operate (in the base situation) above capacity during both peak periods (i.e. between 100% and 125%) and is therefore given a Red score. Although it is

recognised that the junction is currently under strain, it should be noted that the vehicle queues on the A6 southern arm are modelled to be significantly higher than recorded and observed by WYG on site in October 2018 (some 59 vehicles in the PM peak against an observed queue of 10 vehicles). Despite this the TA indicates that the junction model has not been adjusted. It is therefore considered that the model is underestimating the current operational capacity of the junction. The relevance of this is explored in further detail in the following section.

- 2.34 Although consented, the operation of the Booths food-store site access has not been considered by WYG having regard to emerging LP allocations. As detailed earlier, the relevance of this is explored further in the following section.
- 2.35 The A6 Scotforth Road / Hala Road / Ashford Road signal junction ('Hala Road') is modelled by WYG, in the base scenario, to be operating satisfactorily (below 90%) and therefore receives a Green score during both peak periods. Although less significant than within the Galgate model, it should be noted that the vehicle queues on the A6 southern arm are also modelled to be higher than recorded and observed by WYG on site in February 2017 (some 18 vehicles in the PM peak against an observed queue of 10 vehicles). Again the TA states that the model has not been adjusted and the relevance of this is explored in the following section.
- 2.36 With respect to the A6 Greaves Road / Ashton Road roundabout ('Pointer') this is generally shown to be approaching capacity (between 85% and 100%) and therefore receives an Amber score. The model is shown to validate well with the observed queues on site.
- 2.37 Finally, with respect to the A588 Ashton Road / Caspian Way mini roundabout, the junction is shown to be operating significantly below capacity (less than 85%) and therefore receives a Green score for both peak periods. The model is shown to validate well with the observed queues.
- 2.38 With respect to DM and DS scenario testing at 2023 and 2033, Table 7.4 of the WYG TA sets out the parameters where further intervention is likely to be required. This table is reproduced at **Appendix BGH4**.
- 2.39 As a broad rule of thumb, the RAG assessment has again been adopted. It should be noted however, as stated at paragraph 7.2.4 of the WYG report that: -

"...it must be stressed that these thresholds do not correlate with policy guidance in NPPF, in respect of what is a 'severe' impact".

- 2.40 Furthermore, paragraph 7.2.5 states that: -

“...Moreover, for a more detailed approach to establishing if a junction has reached its capacity and severe impact levels, RFC/DOS, queue lengths and delay results should be considered together”.

2.41 The above statements are supported and further weight should be given to them, when considering the impact of development at junctions within the existing urban environment, through the application of professional judgement, having regard to national and local policy.

2.42 Section 7.3 of the WYG TA details those junctions requiring intervention as part of the emerging LP allocations. Table 7.4 states, with respect to the junctions of interest in south Lancaster and the BGV, as detailed above, that: -

- The Galgate and Pointer junctions require intervention at 2023, even in the absence of LP proposals in both peak hour periods (i.e. DM scenario resulting from committed developments);
- Hala Road requires intervention at 2023 DS PM peak scenario and all peak hour scenarios (including DM) at 2033; and
- The A588 Ashton Road / Caspian Way junction requires no further intervention, even in the 2033 DS scenario for both peak hour periods.

2.43 Highway improvement schemes in respect to the above junctions (with the exception of the A588 Ashton Road / Caspian Way) are detailed in the WYG TA Part 2 and reviewed and commented upon below.

2.44 Finally, as detailed above, whilst the WYG approach to assessment (despite the limitations of the analysis highlighted) is generally supported, some points of concern are raised with respect to the number of overly cautious assumptions which have been adopted, i.e. the approach to junction modelling particularly at the Galgate junction and the resulting conservative conclusions within the Councils Transport Evidence base. The impact of these matters in relation to the CEP and Peel sites early phases of development at BGV are detailed in the following section.

2.45 This view is consistent with paragraph 8.1.23 of the WYG report which states that site specific assessments for individual sites will be required to predict the precise nature of the impact of development, on the local highway network, having regard to existing capacities and the NPPF test of ‘severe’ residual impact.

Review of WYG Transport Assessment – Part 2

2.46 Part 2 of the WYG TA builds upon the findings of the Part 1 report and considers further, appropriate mitigation schemes to accommodate as best as possible, the additional traffic generated by the emerging Lancaster LP sites.

- 2.47 In the absence of a STM, the precise nature and impact of the LP allocations in totality are difficult to predict (i.e. at 2033 and beyond) and as such the various improvements suggested by WYG should be considered as ‘short term measures’ (appropriate to 2023) in the absence of the more strategic interventions identified in the LCC Transport Masterplan (and HIF funding bid).
- 2.48 It is understood that the schemes prepared by WYG have been developed within the confines of the existing highway boundary. However, as detailed above, this approach is slightly at odds with normal planning practice in particular in respect to the Hala Road junction which has a commitment to improvements involving land outside of the highway boundary as part of the Booths food-store scheme. The effects of this matter are covered further in the following section.
- Galgate Junction**
- 2.49 Given the existing land constraints, opportunities for improvements at the Galgate junction are considered to be limited, by WYG, and as such significant intervention has not been considered. Two schemes have been prepared by WYG which address, as best as possible, the existing ‘blocking effects’ of ahead traffic by right turning traffic on the A6 approaches. These schemes are contained within the WYG report and the rationale is supported, although it is recognised that further investment will be required in the medium to long term.
- 2.50 Paragraph 3.3.15 of the WYG report states (despite some reservation as expressed at paragraph 3.3.16) that the schemes: -
- “...show that both potential mitigated junction layouts are forecast to operate within capacity in 2023 with the LP in place and within capacity in 2033 without the LP”.*
- 2.51 The schemes (operating marginally over capacity at 103.3% maximum Degree of Saturation) therefore allow for early delivery of development (to 2023) in south Lancaster, even allowing for the cautious assumptions adopted by WYG in respect to committed development, background traffic growth and junction modelling. The cost of the scheme is estimated at circa £115k which is not considered to be prohibitive in the context of early LP aspirations.
- 2.52 It should be noted that additional modest interventions are also possible at the Galgate junction. These are detailed in the approved TA for the Lancaster University Innovation Campus (also prepared by WYG in January 2012, application reference: 11/00800/RCN). The package of measures at the junction includes:-

- Provision of a layby at the northbound bus stop immediately north of the junction;
- Provision of a parking layby and parking management on the A6 north of the junction; and
- The benefits of installing a MOVA / Puffin system at the junction.

2.53 These measures are understood to be deliverable and could easily form an extended package to the LP mitigation measures suggested at Galgate. Although not considered in detail within this TN, these measures are likely to further support the conclusion reached with respect to early delivery of development in south Lancaster.

Hala Road

2.54 With respect to Hala Road, the situation is similar in nature to the Galgate junction, with an existing constrained junction resulting in the blocking of ahead movements on the A6 mainline due to right turning vehicles. WYG have only considered a scheme in the context of land forming part of the highway network (i.e. they do not account for the permitted Booths improvements as detailed earlier) and on this basis conclude that despite the modest improvements, the junction is still a constraint and operates above capacity in the 2023 DS PM peak hour scenario (at 101.9% D of S maximum) although this is no worse than the 2023 DM scenario. WYG conclude therefore that there is limited scope to improve conditions without the use of land outside the public highway. The cost of the WYG scheme is estimated at circa £110k which again, is not considered to be prohibitive in the context of early LP aspirations.

2.55 Although the junction at Hala Road is recognised as a constraint, there are wider ranging improvements as part of the Booths planning permission which would be implemented should the store be developed. Details of the scheme are attached at **Appendix BGH5** and the impact of this is considered further in the following section.

Pointer Roundabout

2.56 With respect to Pointer roundabout, a number of options have been considered by WYG, such as a signalisation scheme and modifications to the existing priority roundabout junction arrangement. The signalisation scheme is favoured by WYG as it fits with the strategic aspirations of the Council and LCC in maximising sustainable travel for the city centre (i.e. BRT, pedestrian / cycle super-highway, etc) and leaves the junction operating significantly better than the existing arrangement. The scheme is modelled to operate at capacity in the 2023 DS peak hour scenarios but over in the 2023 DS peak hour scenarios. The cost of the scheme is however estimated by WYG at circa £2.4m.

- 2.57 WYG state at paragraph 3.3.33, that it is highly likely that the final form of intervention at the Pointer roundabout junction will change once the LCC Transport Masterplan strategies are developed further.

Summary

- 2.58 The following table summarises the 2023 WYG junction analysis and brings together the results of both parts of the TA. A 'tick' indicates that a junction operates satisfactorily, i.e. either under capacity of 100% (i.e. Green and Amber on the RAG scale) or better than the preceding scenario subject to suitable intervention. A 'cross' indicates that a junction does not operate satisfactorily (i.e. is either over capacity and as such receives a Red score) or the impacts of traffic generated by that scenario is considered to be unsatisfactory, even when accounting for junction mitigation measures.

- 2.59 As stated above further intervention is expected beyond this point to 2033 and as such has not been considered further by WYG: -

Table 2.1 – WYG Junction Analysis Summary Table

Junction	2018 Base		2023 DM		2023 DS	
	AM	PM	AM	PM	AM	PM
Galgate	X	X	X	X	✓	✓
Hala Road	✓	✓	✓	✓	✓	✓
Pointer Roundabout	X	X	X	X	✓	✓

NB: 2023 DS Scenarios at Galgate junction operate better than 2023 DM Scenarios and as such receive a tick. The Hala Road junction operates marginally over capacity in the 2023 DS scenario (PM Peak) at 102.7%. With improvements in place this drops to 101.9% and as such the residual impacts are considered acceptable. See notes above with respect to Pointer Roundabout.

- 2.60 In summary, the WYG TA analysis incorporates what are considered to be a number of overly cautious assumptions which results in a number of key junctions on the A6 corridor requiring immediate intervention. Although the junctions are recognised as currently constrained and requiring a comprehensive range of measures to resolve issues in the long term, the WYG analysis does demonstrate, despite the approach to assessment, that in the short term, i.e. to 2023, the LP aspirations can start to come forward with a package of minor interventions, leaving junctions operating with greater operational capacity than in the DM scenario or in a position where 'severe' residual impact does not arise.

- 2.61 Should a more realistic approach be taken to assessment, it is considered that the Councils LP aspirations could be further accelerated even in advance of the mitigation measures identified by WYG. The following section considers this position in greater detail having regard to south Lancaster and early delivery of development at the CEP and Peel sites.

3.0 EARLY DELIVERY OF DEVELOPMENT FROM CEP AND PEEL SITES

- 3.1 This section considers the CEP and Peel sites (both separately and in combination) and identifies, in the context of the emerging LP and the WYG transport evidence base, the level of development which could be delivered in south Lancaster from the BGV, early in the local plan period, without resulting in severe harm to junctions located on the A6 Scotforth Road corridor.
- 3.2 As detailed within the introduction, this section of the report is effectively a condensed TA which identifies the impact of traffic generated by the CEP and Peel sites (both individually and in combination), having regard to the WYG evidence base and with a focus upon operational junction analysis. This section of the TN will present a case to demonstrate the quantum of development which could come forward as part of a first phase of development, prior to significant intervention in south Lancaster associated with the HIF bid.
- 3.3 The BGV was first designated by the Government in January 2017, following the submission of an 'Expression of Interest' (EoI) from the Council. This 'Expression of Interest' identified the need for a new strategic link road from A6 Scotforth Road to facilitate strategic future access to those parts of the Garden Village located to the west of the WCML. The EoI also identified other major investments such as improvements to the M6 (i.e. J33) and measures focused upon sustainable travel.
- 3.4 Although the assessment undertaken by WYG assumes an indicative access to the BGV in the vicinity of the proposed Booths food-store, it should be noted that a position with the Council and LCC for this access across CEP's site was agreed in relation to a planning inquiry detailed further below.
- 3.5 The CEP site was subject to a planning appeal for a mixed-use retail led development (ref: 10/00366/OUT) in 2012. As part of that appeal the location, form and design of an access with the A6 Scotforth Road was agreed in principle with the Council and LCC as highway authority. The agreed CEP site access was a traffic signal control T-Junction which not only served the site, but also provided a strategic link road across the WCML to Whinney Carr (the Peel site). A copy of the agreed site access preliminary layout arrangements is attached at **Appendix BGH6**.
- 3.6 With respect to access to the Peel land holding, access is possible (and desirable) from Ashford Road at the junction with Caspian Way, in addition to access across the WCML to the A6 Scotforth Road. The form of the Ashford Road junction is yet to be considered in detail.

- 3.7 For simplicity and to allow a comparative assessment, except where highlighted, a number of the WYG assumptions have been adopted for the operational assessments presented in this section.
- 3.8 BGH on behalf of CEP and Peel, commissioned fully classified traffic surveys on Tuesday 20th November 2018 between the periods of 7:00 am – 10:00 am and 3:00 pm – 7:00 pm. Queue data was also collected at the time of the traffic surveys and has been used to validate the junction models described in further detail below.
- 3.9 Surveys were undertaken at the following junctions on the A6 corridor given their relationship to the CEP and Peel sites, at BGV: -
- The Galgate traffic signal junction,
 - Hala Road traffic signal junction, and
 - Pointer roundabout.
- 3.10 On the basis of the WYG analysis and conclusions reached with respect to the impact of the LP allocation sites, i.e. no mitigation required, the A588 Ashton Road / Caspian Way mini roundabout, has not been included in the analysis.
- 3.11 Network diagrams for the BGH surveyed AM and PM peak periods are attached at **Appendix BGH7**.
- 3.12 When comparing the BGH base traffic flows with the WYG base traffic flows, the data sets indicate broad correlation for both the AM and PM peak periods, i.e. within the accepted daily variation levels for traffic of +/-10%. A detailed summary table is attached at **Appendix BGH8**. The BGH surveys are therefore considered appropriate for use in the analysis.
- 3.13 With respect to committed development, tests including only those schemes detailed within the previous section have been undertaken on the basis that the CEP and Peel sites could provide early delivery of development and are likely to come forward in advance of other emerging LP aspirations. For clarity these developments are:-
- The first phase of the Innovation Campus (some 8,115 sqm gfa of B1); and
 - With and without the Booths food-store (some 2,052 sqm of A1) and the associated committed highway improvement scheme, i.e. at Hala Road.
- 3.14 This approach to assessment is different to that adopted by WYG, however, it is considered appropriate for the reasons set out in the previous section in relation to the overly cautious nature of the WYG work. Committed development flows for

both the Innovation Campus and Booths sites have been distributed as per the flow diagrams attached at **Appendix BGH9** and **Appendix BGH10** respectively.

- 3.15 With respect to traffic growth, and to balance the fact that not all committed developments have been specifically accounted for, unadjusted Temprow growth rates have been applied of some 9.3% and 8.8% in the AM and PM peaks to 2023 respectively. Whilst this is clearly at odds with the observations made in the previous section, growth has been applied to ensure consistency with the WYG approach. Calculation of these growth rates is attached at **Appendix BGH11**.
- 3.16 An assessment beyond 2023 (i.e. at 2033) is not considered necessary given the context of the LCC Transport Masterplan and the HIF bid and as such detailed analysis of scenarios beyond 2023 has not been considered within this TN.
- 3.17 Growth rates have been applied to the base traffic flows, in addition to the committed development flows (i.e. Innovation Campus and Booths) to result in two sets of 2023 DM scenario flows. These are attached at **Appendix BGH12** and **Appendix BGH13** respectively.
- 3.18 The AM and PM peak 2023 DM flows have been tested using the models prepared for the Galgate, Booths, Hala Road and Pointer junctions. It should be noted that the Galgate and Pointer junctions are on the basis of the existing arrangements (in advance of the WYG suggested improvements).
- 3.19 With respect to Hala Road, two scenarios have been assessed either with or without the Booths development. The Hala Road model is that of a linked LINSIG model as agreed at the 2012 planning appeal on the CEP site, and for the scenario including Booths, includes the committed improvements at the Hala Road junction and the food-store access arrangements. The analyses for all junctions are attached at **Appendix BGH14** and summarised below.
- 3.20 The analysis demonstrates that the Galgate junction at 2023 operates within capacity at a maximum of 98.8% in the evening peak period. These results are significantly lower than the WYG position as a result of the BGH approach to committed development, a point which applies to all the DM Models.
- 3.21 With respect to Hala Road (in the absence of Booths) the junction at 2023 operates below capacity at a maximum of 85.7% in the morning peak period. For a scenario which includes the Booths permission including the junction improvements at Hala Road, the network also operates within capacity in 2023 with a maximum of 83.5% in the morning peak period.

3.22 The analysis demonstrates that the Pointer roundabout junction at 2023 operates within capacity at a maximum of 0.83 RFC also in the morning peak period.

3.23 As expressed in the previous section and highlighted above, the WYG approach is considered overly cautious and limits the reporting of the spare capacity on the highway network which would allow early release of development before mitigation is required. A more realistic assessment of the position in relation to various development scenarios is therefore considered below.

Development Scenario Tests

3.24 A number of scenarios have been tested having regard to early development on the CEP site and Peel site at Whinney Carr with respect to the LP aspirations for the BGV and south Lancaster.

3.25 The CEP site is expected to accommodate upwards of 100 residential dwellings. The Whinney Carr site is expected to provide development in respect to Phase 1 of the BGV for some 1,000 of the overall draft allocation of 1,650 dwellings.

3.26 The WYG residential trip rates have been adopted along with the broad distribution and assignment patterns for development traffic, although the distribution has been refined further having regard to the location of the two sites.

3.27 With respect to the scenarios, the following has been assumed with respect to access, traffic assignment and development density: -

Table 3.1 – Scenario Assumptions

No	Scenario Description	Assumptions
1	CEP site in isolation	Maximum of 100 dwellings with a single point of access from the A6 Scotforth Road (as agreed at the 2012 planning appeal). Northbound traffic heads via the Hala Road junction to Pointer roundabout and southbound traffic travels via the Galgate junction.
2	Peel site in isolation	Up to a maximum of 1,000 dwellings (subject to junction capacities) with a single point of access from Ashford Road. Northbound traffic heads to Lancaster via A588 Ashton Road and A6 Scotforth Road to Pointer roundabout and southbound traffic heads via the Hala Road junction south on the A6 to the Galgate junction.
3	Both sites in isolation	Up to a maximum of 1,100 dwellings (subject to junction capacities) with two separate points of access from the A6 Scotforth Road (as agreed at the 2012 planning appeal) and from Ashford Road. No link over the WCML.
4	CEP and Peel (in combination) with a single point of access	Up to a maximum of 1,100 dwellings (subject to junction capacities) with a single point of access from the A6 Scotforth Road (as agreed at the 2012 planning appeal). Northbound traffic heads via the Hala Road junction to Pointer roundabout and southbound traffic heads via the Galgate junction.
5	CEP and Peel (in combination) with two points of access	Up to a maximum of 1,100 dwellings (subject to junction capacities) with two points of access, one from the A6 Scotforth Road (as agreed at the 2012 planning appeal) and the other from Ashford Road. A link over the WCML is included which reflects the 'original' masterplan for the sites. Traffic distribution dependent upon direction of travel as detailed above. In this scenario there is an allowance for the redistribution of traffic currently using the A6 to use the WCML link road, and the A588 Ashton Road to reach the city centre.

3.28 Each of the 5 development scenarios listed above have been tested with and without the Booths development (and the associated improvements at Hala Road) and on the basis that the WYG junction improvements used to assess the 2023 DM scenarios have been implemented.

3.29 The mitigation measures, include the junction improvements at Galgate, as per the WYG preferred scheme, and whilst other opportunities such as moving bus stops, introduction of MOVA etc are possible, these have not been considered for the purposes of this exercise. For the A6 Scotforth Road CEP access, Booths access and Hala Road (including Booths committed highway improvements) the linked LINSIG network model as agreed at the 2012 planning appeal has been adopted. Finally, with respect to the Pointer roundabout, given the lack of certainty over what improvements are ultimately likely to be adopted at this junction as part of the

overarching city centre package the impacts of each scenario have been tested on the existing roundabout arrangement.

- 3.30 The traffic flows associated with each of the 5 development scenarios are attached at **Appendix BGH15**. These have been added to the 2023 DM flows to result in the 2023 DS flows (with and without Booths) which are attached at **Appendix BGH16** and **Appendix BGH17** respectively. Junction model outputs for all scenarios are attached at **Appendix BGH18**.
- 3.31 Where incremental testing has been undertaken (i.e. scenarios 2 through 5), scenarios have been run until the network is considered to reach maximum capacity generally deemed to be a Practical Reserve Capacity (PRC) of 100% or in the context of the severe harm test (i.e. NPPF) having regard to the preceding DM scenarios test results. The development levels achieved through this incremental testing are indicated below.
- 3.32 The tables below summarise the impact of each DS development scenario (with and without Booths) at 2023. The reported results are the worst case from either the AM or PM peak hour.
- 3.33 Beyond the development levels identified, further junction mitigation beyond that achievable in the short term within the highway boundary is deemed to be required.

Table 3.2 – 2023 Scenario Summary - Without Booth's

2023 Scenario	Galgate		CEP Site Access / Hala Road		Pointer Roundabout	
	Max Cap	Units	Max Cap	Units	Max Cap	Units
DM 2023	98.2%	0	85.7%	0	0.82	0
DS Scenario 1 (100 dwellings)	98.8%	100	86.6%	100	0.83	100
DS Scenario 2 (600 dwellings)	101.4%	600	100.4%	600	0.86	600
DS Scenario 3 (700 dwellings)	101.9%	700	101.2%	700	0.86	700
DS Scenario 4 (1,100 dwellings)	104.0%	1,100	92.8%	1,100	0.87	1,100
DS Scenario 5 (1,100 dwellings)	104.0%	1,100	92.0%	1,100	0.87	1,100

**Table 3.3 – 2023 Scenario Summary
With Booth's**

2023 Scenario	Galgate		CEP Site Access / Booths / Hala Road		Pointer Roundabout	
	Max Cap	Units	Max Cap	Units	Max Cap	Units
DM 2023	98.8%	0	83.5%	0	0.83	0
DS Scenario 1 (100 dwellings)	99.2%	100	84.5%	100	0.84	100
DS Scenario 2 (400 dwellings)	100.9%	400	92.7%	400	0.85	400
DS Scenario 3 (500 dwellings)	101.4%	500	93.0%	500	0.85	500
DS Scenario 4 (700 dwellings)	101.9%	700	90.5%	700	0.86	700
DS Scenario (1,100 dwellings)	104.4%	1,100	90.9%	1,100	0.92	1,100

- 3.34 The tables demonstrates in respect to Scenario 1, the CEP site in isolation, that some 100 dwellings can come forward (with or without the Booths scheme) before any of the junctions under consideration within this report exceed operational capacity of 100%. This site is therefore considered to be appropriate for early delivery in south Lancaster.
- 3.35 With respect to Scenario 2, the Peel site in isolation, the table demonstrates that in the absence of Booths (and the associated improvements at Hala Road) some 600 dwellings can come forward without significant detriment to the highway network, leaving it functioning within, or at, acceptable levels of operational capacity (in the context of the NPPF). With the addition of the Booths permission and traffic generated by the store the level of development in this scenario reduces to some 400 dwellings. Again this site is considered to be appropriate in the context of early housing delivery in south Lancaster.
- 3.36 Having regard to Scenario 3, both the CEP and Peel sites in isolation, the summary table demonstrates that in the absence of Booths, that some 700 dwellings (i.e. 100 from CEP and 600 from Whinney Carr) can come forward without significant detriment to the highway network, leaving it functioning within or around acceptable levels of operational capacity (in the context of the NPPF). With the addition of the Booths permission and traffic generated by the store the level of development reduces to some 500 dwellings (i.e. 100 from CEP and 400 from Whinney Carr).

- 3.37 With respect to Scenario 4, CEP and Peel sites (in combination) with a single point of access from the A6, the table demonstrates that some 1,100 dwellings (i.e. 100 from CEP and 1,000 from Whinney Carr) can come forward (in the absence of Booths) without significant detriment to the highway network, leaving it functioning within or at acceptable levels of operational capacity (in the context of the NPPF). The addition of Booths reduces the number of houses which could come forward in this scenario to some 700 dwellings (i.e. 100 from CEP and 600 from Whinney Carr).
- 3.38 Finally, and having regard to Scenario 5, CEP and Peel (in combination) with two points of access, one from the A6 Scotforth Road and the other from Ashford Road, assuming some base traffic reassignment, the table demonstrates that 1,100 dwellings in total (i.e. 100 dwellings on the CEP site and 1,000 dwellings on the Whinney Carr site) can come forward without significant detriment to the highway network, leaving it functioning within or at acceptable levels of operational capacity (in the context of the NPPF). In this scenario the conclusion is the same in either scenario with or without the Booths store being treated as a committed development.
- 3.39 A detailed summary table for each of the scenarios detailed above is attached at **Appendix BGH19**.
- 3.40 The above analysis shows therefore, that with the intermediate WYG improvements (except for the Pointer Roundabout scheme) in place along with those proposed at Hala Road, early release of development could come forward in south Lancaster, on both the CEP and Peel site individually or in combination with an appropriate link road over the WCML linking the two sites, without resulting in severe harm to the operation of the road network.
- 3.41 It is recognised that beyond the development levels identified above further intervention is required, which the BGV sites could help the Council and LCC to facilitate in the medium to long term to realise the LP aspirations.

4.0 SUMMARY AND CONCLUSIONS

- 4.1 This Technical Note (TN) has been prepared by Bryan G Hall (BGH) on behalf of Commercial Estates Projects (CEP) and Peel Investments (North) Limited (Peel) and reviews the transport evidence base prepared by consultants White Young Green (WYG) on behalf of Lancaster City Council (the Council) in respect to their emerging Local Plan (LP).
- 4.2 The LP sets out the Councils strategy to guide development in the Lancaster District for the next 15 years and is likely to be subject to Examination in Public (EiP) commencing April 2019.
- 4.3 The first part of this TN comments on the approach and conclusions reached by WYG in respect of their two Transport Assessments (TA's) prepared in support of the LP. Whilst the second part of the TN focuses on CEP's and Peel's land holding interests in south Lancaster, areas identified by the Council for significant future growth in the District, and how the Councils transport evidence base prepared by WYG compliments the early delivery of development on both sites.
- 4.4 The review of the WYG approach to assessment is generally supported, however issues are raised with respect to a number of overly cautious assumptions which have been adopted, namely in relation to the application of background traffic growth, the approach to committed development traffic, the calibration of traffic models and the use of committed development improvement schemes, such as those associated with the Booths development scheme at Hala Road.
- 4.5 It is considered that the WYG approach results in a conservative view in relation to the delivery of early development on the CEP and Peel sites, which form part of the Bailrigg Garden Village (BGV) site, that can come forward in advance of the intervention measures being proposed as part of LCC's Transport Masterplan and the subject of a Housing Infrastructure Fund (HIF) bid.
- 4.6 In relation to the A6 Scotforth Road corridor, the main areas of focus to this TN, WYG have prepared intervention measures in respect of the Galgate traffic signal controlled junction, at the Hala Road traffic signal controlled junction and at the Pointer priority controlled roundabout.
- 4.7 The WYG work confirms that no intervention is required at the A588 Ashton Road / Caspian Way mini roundabout junction or the A6 Scotforth Road / Barton Road priority junction.

- 4.8 The WYG work does not reflect the full extent of improvements at the Galgate junction conditioned against Lancaster University Innovation Campus or at Hala Road junction conditioned against the relocation of the Booths store to the Lawsons Bridge site, and these committed improvements will bring with them further small scale improvements in operational capacity.
- 4.9 In the second part of this TN evidence is presented in relation to a number of different development scenarios assessing the resulting impact of early development on the CEP site and the Peel site at Whinney Carr, which form part of the Councils BGV development site.
- 4.10 Although utilising survey data from November 2018, the approach to the modelling of the impact of development adopted in this TN, follows many of the base assumptions in relation to trip generation and traffic distribution as used by WYG in their assessments.
- 4.11 One of the significant differences between the BGH and WYG analysis is in relation to the way that committed development is applied to the 2023 assessment year, with this TN taking a more realistic view in relation to how much development from sites, such as the Innovation Campus, can come forward by the design year of 2023.
- 4.12 A number of development scenarios have been tested which consider the impact of development on CEP and Peels Whinney Carr sites using a variety of access strategies, and in each case the assessment of the impact of development related traffic has reflected a scenario with and without the relocation of the Booths store, which brings with it, an increase in traffic flows on the A6 corridor a new signalised site access junction and improvements to the A6 Scotforth Road / Hala Road junction.
- 4.13 In summary the scenario testing has demonstrated that: -
- A development of circa 100 houses on the CEG site can come forward via a new signalised access onto the A6 corridor site without resulting in a significant worsening of traffic conditions on the wider highway network;
 - Development of up to 400 dwellings on the Whinney Carr site (600 dwellings in a scenario where the Booths development does not come forward) can be accommodated on the highway network via an access strategy which involves the construction of a new access onto Ashford Road to the north of the Peel land holding which facilitates access to Lancaster city centre via A588 Ashton Road;

- Development of both sites in combination utilising the access strategies set out above, without any link between the two sites, can deliver development of up to 700 houses (100 on the CEP site and 600 on the Whinney Carr site) without the Booths development, reducing to 500 houses (100 on the CEP site and 400 on the Whinney Carr site) with the Booths development.
- Development of both sites in combination with a single access point onto the A6 Scotforth Road, facilitated by a bridge over the WCML, can deliver 1100 houses on a scenario without Booths (100 on the CEP site and 1000 on the Whinney Carr site) reducing to 700 houses in a scenario which includes Booths (100 on the CEP site and 600 on the Whinney Carr site); and
- Development on both sites with an access strategy that provides a new traffic signal junction onto the A6 Scotforth Road and an access onto Ashford Road with a link between the two sites facilitated by a bridge over the WCML, can deliver full development on both sites (100 on the CEP site and 1000 on the Whinney Carr site) in either scenario. This access strategy would also allow some transfer of traffic from the A6 Scotforth Road corridor to the A588 Ashton Road corridor to facilitate access to Lancaster city centre.

4.14 In conclusion the WYG transport Assessment prepared on behalf of the Council in support of the LP has been prepared on a highly precautionary basis and as a consequence underestimates the quantum of development that could be facilitated from the BGV site prior to the significant highway infrastructure improvements that will be delivered as part of full development of the site.

4.15 This TN has shown that with the intermediate improvements identified by WYG in place (except for the Pointer Roundabout scheme which has no certainty at this stage) along with the improvements proposed at Hala Road, the early release of development in south Lancaster could come forward on both the CEP or Peel site individually or in combination with an appropriate link road over the West Coast Mainline (WCML) linking the two sites, without resulting in severe harm, on the highway network.

4.16 It is recognised that beyond the development levels identified in this TN further intervention is required, which the BGV sites could help the Council and LCC facilitate in the medium to long term to realise the LP aspirations.

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Appendix 6 Draft Revised Wording to Policy SG1

Policy SG1: Broad Location for Growth– Bailrigg Garden Village

The Council has identified a Broad Location for Growth -Bailrigg Garden Village on the Local Plan Policies Maps. This will be a major mixed-use development which focuses on the delivery of at least 3,500 new houses, a number of opportunities for employment and economic growth opportunities including the delivery of Lancaster University Health Innovation Campus.

Key Principles of the Garden Village

The Council has defined a range of principles which will be at the heart of planning and development for the Garden Village, these include:

- Involving local communities in the creation of new development where high-quality urban design promotes sustainable, attractive places to live, defines a sense of place and creates a sense of community for its new residents.
- Seeking a modal shift in local transport movements between the Garden Village, including Lancaster University Campus, Lancaster City Centre and beyond into the employment areas of Morecambe/ Heysham through the delivery of a Bus Rapid Transit System and Cycling and Walking Superhighway network.
- Delivering a wide range of market and affordable housing, in terms of type and tenure to ensure that opportunities to live in the Garden Village are available to all sections of the community and contribute significantly to the district meeting its evidenced housing needs particularly in the medium and long term phases of the Local Plan period.
- Ensuring that the necessary infrastructure to deliver sustainable growth is delivered in the right place, at the right time, to address strategic constraints to the delivery of future development.
- The creation of sufficient areas of high quality open spaces to provide a distinct sense of place and deliver a network of green corridors across the Garden Village to the benefit of the local environment and residents. The delivery of such spaces should include distinct areas of separation between the core of the Garden Village area and South Lancaster and also Galgate and investigate opportunities for a new country park.
- The creation of healthy and cohesive communities through the delivery of high quality development and the correct levels of services and infrastructure which is provided in safe and accessible locations.
- The sympathetic masterplanning of new facilities and growth within the campus of Lancaster University for a range of educational facilities and student accommodation.
- Taking proper account of the need to reduce the impacts of Climate Change in the design of new development. This should assure that new development is resilient to the effects of Climate Change.
- Managing water and run-off to safeguard development, assuring public safety and amenity and take active measures to reduce flood risk within the area and downstream for both existing and new residents and businesses.
- Offering opportunities for national housebuilders to work alongside local construction firms and encourage training opportunities for local people, particularly through the construction phases of the Garden Village. The Garden Village should also include opportunity for the provision of self-build and custom-build properties.

- To assure innovative urban design both in terms of the layout and density of new development and the specific design of new buildings. This should include the application of new technologies for buildings and transport where possible.
- Addressing longstanding constraints and capacity issues in the strategic and local road network through the improvements to traffic management and physical interventions to increase capacity. This will involve the re-configuration of Junction 33 of the M6 to allow direct motorway access into the Garden Village and remove motorway traffic from Galgate which is currently designated as an Air Quality Management Area (AQMA).

To support the delivery of the Garden Village, there will be a requirement for a wide range of both locally important and strategically important infrastructure, including new highways, public transport network, education provision, new local centre(s), open spaces and green network. These are set out in Policy SG3 and will be addressed in more detail in the future Spatial Development Framework, which will form a Development Plan Document (DPD) for the Bailrigg Garden Village.

Future proposals will need to demonstrate that no European designated site would be adversely affected by development either alone or in combination with other proposals, as per the requirements of Policy EN9 of the DPD. In view of the potential for likely significant effects as a result of this allocation development proposals at Bailrigg Garden Village must accord with the requirements of Appendix D of the Local Plan. must delivered as part of any future proposal.

To enable a comprehensive and co-ordinated approach to new development and strategic growth, piecemeal or unplanned development proposal within the area which are likely to prejudice its delivery (including infrastructure required for the area) will not be permitted beyond that which has already secured planning permission or on the land identified on the Proposals Map as a sustainable urban extension of Lancaster. and proposals which are sited within the development footprint of Lancaster University Campus. Planning permission will be granted on those sites in advance of the adoption of the Bailrigg Garden Village DPD where it is demonstrated that the development:

- will not result in severe cumulative impacts on the transport network
- will not prejudice the delivery of adjoining land within Bailrigg Garden Village
- will support an integrated and coordinated approach to the development of the Bailrigg Garden Village; and
- accords with the Key Principles set out in this policy.

Mechanism for Delivery of the Garden Village

The Council will prepare and implement a specific Development Plan Document (DPD)—for this area of growth, entitled the-Bailrigg Garden Village Area Action Plan DPD. As a result Subject to support for a sustainable urban extension on the land identified on the Proposals Map, development in this area will be delivered in accordance with this Area Action Plan ~~and the Council will not support piecemeal development of the area (beyond existing planning commitments) in advance of the preparation of this DPD.~~

The recommendations of the Local Plan (Part One) Sustainability Appraisals should be taken into account when preparing this document.

The purpose of the DPD will be as follows:

1. To provide more detail on how the development principles set in this policy will be delivered;
2. To set out a Spatial Development Framework ~~as a basis for further masterplanning and to~~ and masterplan to help guide the preparation and assessment of future planning applications;
3. ~~To provide a Spatial Development Framework against which future development proposals and planning applications will be assessed~~
4. To enable and support the co-ordination and timely delivery of the infrastructure necessary to facilitate growth in this location.

The potential for the future re-configuration of Junction 33 of the M6 and highway network improvements in South Lancashire will be an integral part of this forthcoming DPD.

To ensure the timely delivery of the Bailrigg Garden Village, work on a Spatial Development Framework and the wider DPD has already commenced and is anticipated to be ready for adoption within the first 2 years of the plan (i.e. before 2022). In order to maintain housing delivery rates in the District, planning applications within the sustainable urban extension area identified on the Proposals Map will be assessed against the Key Principles set out in this policy. ~~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.~~

Appendix 7 South Lancaster Illustrative Masterplan



Scale 1:2,000
North
0m 20 40 60 80 100m 200m

RANDALL THORP

LANDSCAPE ARCHITECTURE
ENVIRONMENTAL PLANNING
MASTERPLANNING
URBAN DESIGN
Canals House, 3 Chaplow Street,
Manchester M1 5WJ
0161 228 7721 info@randallthorp.co.uk
www.randallthorp.co.uk

KEY
Public right of way
Dry-stone wall
Hedgerow
Existing waterbody
Proposed footway
Proposed cycleway
Canalside footpath (existing)
Existing buildings
Sites currently under construction
Potential strategic spine road link to wider Bailrigg Garden Village

Proposed footway
Proposed cycleway
Canalside footpath (existing)
Existing buildings
Sites currently under construction
Potential strategic spine road link to wider Bailrigg Garden Village

Existing woodland
Proposed trees / woodland
Green infrastructure
Development parcel
Built-form frontage

Surface water attenuation (SWA)
Potential school site
Land subject to residential proposals by CEG
Land with planning permission for Booths food store
Land for proposed student accommodation

Land subject to residential proposals by Story Homes
Bus stop
NEAP (Neighbourhood Equipped Area for Play)
LEAP (Local Equipped Area for Play)
SIP (Space for Imaginative Play)
Village Centre

Date: 21.03.19
Drawn by: AH
Checked: SR
Rev by: SR/YH
Rev checked: SR
QM Status: Checked
Product Status: Issue



Whinney Carr, Lancaster

Indicative masterplan including surrounding existing green infrastructure

Drwg No: 4500_12E

Scale: 1:2,000 @ A1

Appendix 8 Illustrative Masterplan for CEP's Land at Scotforth Road (planning application ref. 19/00332/OUT)

