



Developments Affecting Trunk Roads and Special Roads

Highways England Planning Response (HEPR 16-01)

Formal Recommendation to an Application for Planning Permission

From: Alan Shepherd – Divisional Director
Network Delivery and Development
North West Region
Highways England
planningNW@highwaysengland.co.uk

To: Lancaster City Council

CC: transportplanning@dft.gsi.gov.uk
growthandplanning@highwaysengland.co.uk

Council's Reference: 19/01135/OUT

Referring to the notification of an outline planning consultation dated 8th January 2020 for the demolition of Low Hill House and the erection of up to 680 dwellings (C3), a single retail unit (A1 - A5) of no more than 280sq m internal floorspace, public open spaces including equipped children's play areas, land re-grading, recreational routes, landscaping and sustainable urban drainage systems and creation of vehicular access from Bailrigg Lane and Hala Hill to the north of land north east of Bailrigg Lane, Lancaster, Lancashire, notice is hereby given that Highways England's formal recommendation is that we:

- ~~a) offer no objection;~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);~~
- c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);
- ~~d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B is / is not relevant to this application.¹

This represents Highways England formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should you disagree with this recommendation you should consult the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2015, via transportplanning@dft.gsi.gov.uk.

Signature: *Warren Hilton*

Date: 27th January 2020

Name: Warren Hilton

Position: Assistant Spatial Planner

Highways England:

8th Floor, Piccadilly Gate, Store Street, Manchester M1 2WD

¹ Where relevant, further information will be provided within Annex A.

Annex A ~~Highways England recommended Planning Conditions /~~
~~Highways England recommended further assessment required /~~
~~Highways England recommended Refusal.~~

HIGHWAYS ENGLAND (“we”) has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Highways England provided comments to Lancaster City Council as part of an Environmental Impact Assessment (EIA) scoping consultation (reference 19/00491/EIO) held in April 2019 for this site.

Background

The submitted planning application seeks outline planning permission for a high-quality sustainable development comprising the following:

- Residential development for up to 680 new homes.
- A new local shop.
- Extensive areas of green infrastructure, including proposed recreational routes and retention of the existing on-site public footpath, retained areas of woodland, trees and hedgerows, and new areas of public open space incorporating ecological mitigation and habitat creation, sustainable drainage features and a number of children’s play areas.
- Full approval for two vehicular access points into the site, which are to be taken from the access road for the Lancaster University Health Innovation Campus and Hala Hill, together with an emergency access point from Winmarleigh Road. The short section of road connecting the site with the Health Innovation Campus road (currently under construction) is subject to a separate, full planning application for technical reasons. However, it is anticipated that the two applications be determined in tandem as a single proposal.

The site measures approximately 39.36 hectares in area and is located on the southern extent of Scotforth, a suburb in the south of Lancaster. It occupies several pastoral fields separated by a mix of managed hedgerows and areas of woodland. To the north and north west, the site is bound by existing housing in the settlement of Scotforth. The M6 bounds the site to the east. Immediately to the south of the site is the hamlet of Bailrigg, which is accessed by Bailrigg Lane. To the south and south

west of the site lies the main campus of Lancaster University, including the Health Innovation Campus, which is currently under construction. To the west, the site is bound by existing housing in Scotforth and two arable fields, beyond which lies the A6 Scotforth Road.

The site lies within “Lancaster South Broad Location for Growth” which includes a new Garden Village called “Bailrigg Garden Village”. Located to the south of Lancaster, the broad location for growth is planned to deliver at least 3,500 new homes supported by a range of commercial and business opportunities, which includes the delivery of the Lancaster University Health Innovation Campus.

Local Plan

The adopted Development Plan for Lancaster comprises the Local Plan Core Strategy (2008), the Development Management Development Plan Document (DPD) (2014) and the saved spatial policies of the Lancaster District Local Plan (2004).

Lancaster City Council submitted its Strategic Policies and Land Allocations DPD and Development Management DPD to the Secretary of State (SoS) on the 15 May 2018 for independent examination. Examination hearing sessions took place between the 09 April and 01 May 2019 and on the 21 May 2019. The Council then published its proposed Main Modifications to the Local Plan in August 2019 for an 8-week public consultation. All of the representations received were forwarded to the Planning Inspector for consideration before finalising the report setting out the conclusions on the soundness and legal compliance of the DPDs, which is yet to be published.

Furthermore, it should be acknowledged that the emerging Lancaster South Area Action Plan (AAP) DPD is at an early stage in the plan making process. The AAP will set the spatial framework for growth and high-quality sustainable development, directing and guiding the opportunities identified in Lancaster South and the Garden Village through the submitted Strategic Policies and Land Allocations DPD (Policies SG1, SG2 and SG3), and how these can best be delivered and achieved. The AAP intends to provide clarity to developers to enable them to masterplan and design appropriate developments within the broad location for growth.

The principle of the Garden Village in Lancaster South has been established through the emerging Strategic Policies and Land Allocations DPD. Policy SG1 establishes the broad location for growth and sets out the principles at the heart of its planning and development. Policy SG3 requires necessary strategic infrastructure to be delivered at the appropriate time and that all developments within the broad location for growth contribute to infrastructure requirements in a fair and equal manner. In addition, the policies states that in exceptional circumstances, the Council may permit development proposals that are in advance of the finalisation of the Lancaster South AAP DPD, but it will not permit piecemeal development in this area that

undermines the integrated and coordinated approach to the wider Bailrigg Garden Village area and which does not seek to address matters of strategic infrastructure in accordance with Policy SG1. Within the proposed Main Modifications to the Local Plan published in August 2019, it is anticipated that within the plan period 1,205 new dwellings will be delivered in Bailrigg Garden Village Lancaster South Broad Location for Growth, with 205 new dwellings delivered in the first five years, 700 new dwellings delivered in years 6-10 and 300 new dwellings delivered in years 10-15.

Highways England is concerned about a piecemeal approach to development in Lancaster South, which would result in the delivery of development ahead of the necessary strategic infrastructure. This could result in independent piecemeal mitigation being delivered that will only address the impacts of individual developments, rather than contributing towards longer-term mitigation to offset the impact of cumulative development. In addition, Highways England has consistently raised concerns throughout the plan making process in relation to the transport evidence supporting the emerging Local Plan. **We do not consider that the Local Plan Transport Assessment (LPTA) provides a robust transport evidence base, and have concerns over the validity of the conclusions, along with the scope and suitability of the identified mitigation affecting the SRN.** We set out these concerns in our responses to the emerging Local Plan consultations, which were submitted to the Planning Inspector for consideration.

Lancaster South (Bailrigg Garden Village) AAP Issues and Options Paper refers to a Bus Rapid Transit (BRT) system, cycle superhighway, walking routes, greenspaces, park and ride and a reconfigured M6 Junction 33 as reducing car trips, and underpinning the ready access by sustainable transport principles for the Garden Village. Lancashire County Council (LCC) has submitted a bid to the Housing Infrastructure Fund (HIF) for works to support the sustainable development of the Bailrigg Garden Village including a reconfigured Junction 33 of the M6, Bus Rapid Transit (BRT), Cycle Superhighway and enabling works including the introduction of two new vehicular links to the Garden Village from Scotforth Road.

The BRT, cycle superhighway and reconfiguration of Junction 33 were not included within the scope of the LPTA. Therefore, it is not possible to make any assertions relating to the impact these proposed mitigation measures would have on the highway network. In addition, the schemes are likely to have a positive impact on the City of Lancaster they are also likely to change how vehicles use the current network and may result in more traffic using specific junctions or sections of road (including the SRN).

We consider the Local Plan has been advanced before the transport arrangements have been properly assessed both in their own right and as supporting infrastructure for the overall development strategy. The Council published its transport evidence post-submission of the Local Plan to the SoS.

Furthermore, the development strategy promoted as part of the HIF bid did not appear to be consistent with that submitted to the SoS for independent examination.

Highways England Comments on Croft Transport Assessment **Transport Assessment**

In accordance with current Department for Transport (DfT) guidance for C3 residential land uses, the proposals fall within the threshold requiring a full Transport Assessment (TA) and Travel Plan (TP). It is noted that the scope, extent of the study area in terms of assessing the local highway network and committed developments has been agreed with Lancaster City Council and LCC.

In Highways England's response to the EIA scoping, pre-application 19/00491/EIO, we requested that the scope for any transport assessment accompanying this development should also be agreed with Highways England. However, there has been no correspondence with us to date. As such, we have reviewed the TA prepared by Croft in support of planning application 19/01135/OUT and have the following comments:

- It is noted in the Summary of Proposals sections of the TA that they seek planning permission for the erection of dwellings and a single retail unit. It is noted that further analysis on the retail unit has not been included in the TA including: trip generation, trip distribution and assignment. Therefore, **it appears that the retail unit has not been included in the assessments undertaken as part of the TA.**
- In the EIA scoping review note, it was documented that Highways England would expect the TA document to include a chapter on the existing conditions, including details on local road safety conditions. **The TA has not undertaken any road safety/collision analysis as part of their existing conditions chapter.**
- It was also mentioned in the EIA scoping review document that the TA should include consideration of a 2033 reference case, which aligns to the same year as the Lancaster City Council LPTA. **The TA instead focuses upon the anticipated year that the proposed development will be completed, which is 2029.**
- It is noted in the TA that a separate application is to be submitted for the section of highway that will link the northern end of the Health Innovation Campus spine road to the current development site, including the crossing of Bailrigg Lane. However, we have not been consulted on this separate application so cannot comment on it at this stage.

Highways England expects all of the above points to be addressed, so that an informed decision can be made on the impact of this proposal.

Transport Impact

The TA states that the future year traffic flows have been derived from the National Transport Model (Tempo) for Bailrigg. Given that the Bailrigg area has a predominant land use relating to the university, and not residential and we would therefore question the suitability of the rates used. **As a consequence, we request that justification is provided relating to the suitability of the MSOA used to derive the growth rates.**

The TA considers committed developments in the vicinity of the site, including those identified by Lancaster City Council and LCC. However, reasons have been given in the TA to not account for several committed developments as part of the analysis. For several of the committed development sites it is noted that as the proposed traffic generation is expected to have a low impact on the local highway network, it has not been taken account of in the TA analysis. Although this may be the case for individual sites on their own, **we question whether the cumulative impact of the committed development sites would have an impact on the highway network.**

The TA notes that trip rates have been generated by the TRICs database and have formally been agreed with highways officers at LCC, and are of a reasonable level. As previously stated, trip rates have not been provided for the retail unit which is part of the proposals, and therefore it is requested that this is included.

Figure 19 of the TA summarises the proposed development trip distribution, with one trip distribution used for both the morning and evening peak. It is noted that the distribution of trips entering the site, is reversed for the distribution of trips leaving the site, which is a reasonable methodology. However **more information is required as to how the trip distribution has been calculated, in particular for the trips to the south of the network on the A6 and M6, including providing details relating to the origin used for the journey to work analysis, and the suitability of this origin.** It is noted that the trip distribution suggests that only 2% of the development traffic will use the M6 Junction 33 in each direction and will only be for vehicles to the south. There is no distribution for vehicles coming from or going to the north using the M6 Junction 33.

Junction Assessments

A range of junction assessments have been undertaken in the TA where there is forecast to be an increase of at least 30 two-way vehicles movements during the weekday peaks. This is a reasonable methodology, noting that our concerns regarding the trip distribution may change this appraisal. In addition to the two proposed site access junctions, thirteen capacity assessments have been undertaken using the junction software packages of ARCADY/PICADY and LinSig.

The model files have not been provided, with outputs from the model included in the appendices of the TA. In all the ARCADY/PICADY models there are no heavy vehicle percentages, which should be included in all models.

For the A6/Stoney Lane/Salford Road junction no assessment has been presented in the TA. The TA notes the method agreed for the 2009 Lancaster Science Park to undertake a qualitative assessment and provides a brief summary of the assessments undertaken by consultants WYG for the Local Plan assessment and concludes that there are limited options to improve the junction. **It is concerning that no assessment of the developments impact at this junction has been provided at part of the TA.** It is requested that an assessment is provided to demonstrate the developments impact at the junction, with particular reference to the morning peak northbound queues at the junction and how they may impact on the operation of the M6 junction 33 slip roads. It is agreed that the junction would be difficult to model using LinSig and would recommend that an assessment is carried out using microsimulation software.

The ARCADY assessment for the M6/A6 roundabout suggest that they will operate within capacity with the development traffic. There is a further assessment which focuses upon the percentage impact of flows on the slip roads at the M6 Junction 33. **Depending on the conclusions of the trip growth and distribution methodology, the assessments of the slip roads may need to be updated.**

In the EIA scoping note it was noted that “in support of any planning application for this site, a TD22 analysis for the slip roads at J33 and further modelling should be undertaken to determine that the development does not have an adverse impact upon the safety and operation of the SRN”. It is noted that modelling has been undertaken to understand the predicted impact of the development at J33, but **no TD22 analysis has been undertaken. It should be noted that the standards have now change to CD122 and we request that this analysis is undertaken.**

Highways England Comments on Travel Plan

There is a Framework Travel Plan (FTP) for the development site in Appendix 2 of the TA. This FTP includes measures, and details of how these measures will be met. The FTP includes a section for Targets, such as car trips per household, uptake of alternatives, car ownership and mode of travel and TP awareness, but **has not set out specific targets due to requiring more baseline data.** The TA states that a Resident Travel Survey will be undertaken within one month of the development being 50% occupied. **Justification is required as to why this will take place when the development is 50% occupied, as residents will likely have already chosen their pattern of mode of transport, and this will require further work to change their behaviour.**

Highways England Conclusion and Formal Recommendation

The Transport Assessment states that the proposals are for residential development and a retail unit, however no assessment appears to have been undertaken for the retail unit. It is expected that this will be undertaken as part of the TA. Further work is also required to address the points relating to local road safety conditions and the 2033 reference case. Given that the current land use in the Bailrigg area is predominantly related to the university, the suitability of the sites used for the traffic growth and traffic distribution requires addressing, with further details provided relating to the methodology used.

Until the applicant provides further information and completes an adequate impact assessment of the A6 / Stoney Lane / Salford Road junction to the satisfaction of both LCC and Highways England it is not possible for Highways England to form a judgement on the merits of this application, and therefore it is recommended that the application is held until the revised work is completed.

Whilst the principle of a Garden Village in south Lancaster has been established through the emerging Local Plan, the Planning Inspectors' report has not yet been published. In addition, the Lancaster South AAP DPD is at a very early stage in the process, and is not supported by any robust transport evidence. Therefore, this proposed development for a major housing scheme within the Bailrigg Garden Village area will need to be assessed on its own merit, but within the context of the wider Local Plan, Lancaster South AAP DPD and HIF bid.

Consequently, Highways England now formally recommends that this application is not determined until at least 28th April 2020 in order to enable time for the information / assessments we require to be produced and for them to be reviewed. Should Highways England be able to reach a final view on the application before this date, the hold may be lifted earlier.

This response represents our formal recommendations with regard to this application and has been prepared by Warren Hilton.