



## **CLOUD SUMMARIES**

### **HIGHWAYS ENGLAND'S RESPONSE HEPR 16-01 OF 27th JANUARY TO GLADMAN'S APPLICATION FOR 680 HOUSES AT HALA/BAILRIGG**

This runs into nine pages, but might be summarised. Highways England (HE) recommend that planning permission not be granted at the moment as the development is not justifiable on the basis of the traffic implications as currently addressed.

HE addresses a number of problems, a few of which might be summarised as follows.

The proposal represents a piecemeal approach to development in Lancaster South which would result in the delivery of development ahead of the necessary strategic infrastructure. HE is concerned that piecemeal mitigation will not contribute towards the longer term mitigation needed to offset the impact of cumulative development.

HE is also concerned that the Transport Assessment in the Local Plan is not based on robust evidence and are concerned about its conclusions and the weakness of the mitigation suggested.

It notes that the Council's plans for Lancaster South (Bailrigg Garden Village) envisage a 'Bus Rapid Transit System, a Cycle Superhighway, Walking Routes, Greenspaces, a Park and Ride and a reconfigured M6 junction 33, but none of the details, viability, or funding of any of these have been identified or confirmed yet. HE says, furthermore, that the strategy proposed in the funding bid for some of these did not appear to be consistent with that submitted to the government through the Planning Inspector.

HE go on to note that they had asked the proposed developer to agree a Transport assessment with them, but the developer had not sought to do so. HE is critical, however, of a Transport Assessment which they have seen. The traffic impact of the retail element appears to have been ignored. The current transport situation, including road safety issues, should have been assessed but have not. The effects of the traffic link to the Health Innovation Campus Spine Road and the crossing of Bailrigg Lane are not included in this developer's Transport Assessment. HE say that all of the foregoing needs to be addressed to allow an informed decision to be made about the proposed development.

HE critical of the method used to predict future traffic growth and request justification. In addition it is concerned about traffic growth when the contribution of

this proposed development is considered in the context of the several other development sites in the pipeline.

HE is very critical of the proposed developer's assessment of trip distribution through the day and its effects on morning and evening peaks. It is concerned about the number of trips to work, going south on the A6 and onto the M6. It notes that the proposed developer's assessment envisages **only 2%** of the traffic going south to the M6 junction 33 !! Furthermore, it does not even mention vehicles coming from or going to the north using j33 !

HE notes that in calculating the effects of traffic at the road junctions, heavy vehicle numbers have not been included.

HE goes on to say that "*it is concerning*" that no assessment of the traffic impact on the A6/Stoney Lane/Salford Road road junction has been provided. They appear to be particularly concerned about morning peak traffic queues on the main road and motorway slip roads.

The proposed developer is required to supply a Travel Plan, addressing the anticipated means of travel of the residents of the proposed development. HE is critical of the lack of detail, however. This Plan should also seek to influence proposed residents' modes of transport, but the developer doesn't propose to consider residents' choices until the development is 50% occupied (340 dwellings occupied; 400 or more built?), which will be too late. HE wants to know why.

All in all HE is somewhat critical of the proposed development and is concerned about important information not assessed or not provided or withheld. It therefore recommends to the Council that **planning permission not be granted** at this time.

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## LANCASTER CITY COUNCIL'S RESPONSE, AS THE PLANNING AUTHORITY, OF 20th JANUARY TO GLADMAN'S APPLICATION FOR 680 HOUSES AT HALA/BAILRIGG

This runs into nineteen pages, but might be summarised. The Planning Officers (the planners) are, on the whole, critical of and not supportive of this application. The final decision lies with Council members on the Planning Committee however.

Although the formal closing date for the public's comments has passed, it is understood that, on an *informal* basis, further comments **will be accepted and considered** up to close to the Planning Committee's meeting date.

The planners acknowledge that the Local Plan has not yet been confirmed, following the Inquiry, and accept that there is an "early release mechanism" whereby, on a limited basis, some smaller and less controversial developments can be accepted in advance of implementation of a confirmed/amended plan, they believe that this Hala/Bailrigg is **not eligible** in this way. They state that "the early release of land

through this mechanism would be in exceptional circumstances", and they **do not** consider exceptional circumstances to apply in this case.

The planners look at adherence to the key principles in "The Key Growth Principles for Development" which are required for any development of this nature, and they find that it **fails** in a number of important areas :-

- \* **High quality design promoting sustainable attractive places to live; sense of place; creating sense of community.** The planners say that "it is not clear that the proposal passes this principle."
- \* **Seeking modal shift in local transport movements through delivery of 'Bus Rapid Transit and Cycling and Walking Superhighways.** The planners feel that the proposed development fails in these respects, noting that it is "highly reliant on the use of motor vehicles....it is over 2 km from the nearest local centre...the inclusion of public transport services appears to be absent and the improvements to cycling and walking to encourage movements to the north (city centre) don't appear to have been considered.
- \* **Delivery of necessary infrastructure.** The planners note that this is not currently confirmed nor assured, being "highly reliant on the responses received from key infrastructure providers"
- \* **Creation of areas of high quality open spaces; a network of green corridors and walking and cycling routes to benefit the local environment and residents...making for distinct areas of separation between new development and the urban edge of Lancaster, Bailrigg and Galgate and giving potential to bring forward a new country park.** The planners feel that the proposed development fails in these respects.
- \* **Creation of healthy and cohesive communities through deliver of high quality development and correct level of services, open space and infrastructure provided in safe accessible locations.** The planners simply say "See previous comments. It's not clear these matters have been addressed".
- \* **Co-ordination with masterplanning of the University and safeguarding the University's campus ensuring development is well planned and does not have adverse impact on the campus and its setting.** This has not been achieved as the planners state that it is still "subject to the response from Lancaster University".
- \* **Need to design development to minimise contribution to, and impacts of, Climate Change and ensure new development is resilient and adaptable to the effects of climate change.** Clearly this is a most important issue, and becoming more so by the day. The planners cannot confirm that this is being achieved, saying this "is highly reliant on the responses received from the LLFA and Environment Agency.
- \* **Managing water and run-off to safeguard development assuring public safety and amenity with active measures within development to reduce flood risk downstream for both existing and new residents and businesses.** Again, clearly this is a most important issue, and becoming more so by the day. The planners cannot confirm that this is being achieved, saying this "is highly reliant on the responses received from the LLFA and Environment Agency.

\* **Opportunities to work alongside local construction firms and encourage training opportunities for local people; opportunities for provision of self-build and custom-build properties.** The planners say that "it is not likely that this principle will be fulfilled."

\* **Innovative design in layout and density and in the specific design of new buildings; application of appropriate new technologies for buildings and transport; investigating opportunities for localised heating systems.** The planners say that the proposal fails to address any of this.

\* **Addressing long standing road problems through improvements to traffic management, increasing capacity and advantaging sustainable travel, involving reconfiguration of the M6 junction 33 and removing traffic from Galgate which is designated as an Air Quality Management Area.** The planners have a number of objections in these respects. At that time they wrote "this will be highly reliant on the responses received from Lancashire County Council and Highways England". As noted above, Highways England recommends to the Council that **planning permission not be granted** at this time. The planners particularly note that the proposed development conflicts with the emerging Local Plan in a number of ways regarding transport, traffic and roads.

\* **Compliance with the current adopted Local Plan.** The planners say that "The application site is located within land designated as countryside in the adopted Local Plan", meaning that development will only be permitted where it is "In scale and keeping with the character and natural beauty of the landscape and is appropriate to its surroundings" not resulting in "significant adverse effect on nature conservation or geological interests and makes satisfactory arrangements for access, servicing, cycle and car parking". The planners' view, noting "the development of up to 680 dwellings" is "that the quantum of development proposed is excessive and does not comply with current adopted policy". The planners also note that the proposed development conflicts with policies concerning landscaping matters including woodland opportunity areas, green spaces, green corridors and key urban landscape. Significantly they say "There are no allocations within the adopted Local Plan for development in this location"

\* **Housing.** The planners are concerned about this so have much to say, but in summary say that whilst they are committed to seeing an adequate supply of new housing coming forward, and some developments can be approved in advance of confirmation of the emerging Local Plan, the size, nature, design and location of this proposed location **does not** make it eligible for approval

\* **Affordable Housing and Viability.** The planners note that, in this development proposal, "the Affordable Housing Statement includes contradictory statements with regard to the percentage of affordable housing which will be delivered on the site.". In summary, they are not satisfied that the proposals would deliver an adequate amount of affordable housing for local people, or indeed for anyone.

\* **Climate Change.** The planners are greatly concerned about effects of and mitigation of Climate Change, and note that the Council declared a Climate Change Emergency in January 2019. They state that "mitigation measures will be a significant consideration in the assessment of the proposals". They go on to consider this at length, but find that the adverse and damaging effects of this proposed development cannot yet be seen to be avoided and would be reliant on measures which cannot yet be identified. Risk of further contribution to flooding cannot therefore be currently ruled out.

\* **Cycling and Walking Infrastructure.** Local planning policy expects new developments to encourage and facilitate modal shift, that is to say, away from cars to 'buses, walking and cycling. the planners would particularly expect to see cycle and walking routes in this proposed development connecting to schools, employment and community facilities. They are concerned that this proposed development does not provide this. They say "the proposed network does not provide a safe and attractive network that can effectively contribute to modal shift. From a cycling and walking infrastructure point of view the proposal should not be supported". The planners also note that national planning policy states that "applications for development should give priority first to pedestrian and cycle movements..and..facilitating access for high quality public transport". The planners are concerned that the proposed development falls short in these respects.

In addition to the foregoing specific policy issues, the planners offer their comments on strategic issues:-

# **Principle of Development; Emerging Local Plan Position - Application of Emerging Policies; Emerging Local Plan Position - Proposed Mechanisms for Delivery; Emerging Local Plan Position - Conclusions.** The planners have much to say on this, which is not supportive of the application for the proposed development. In summary the thrust of this is that the proposed development is not in accordance with and is not supported by the current Local Plan in force; it does not accord with the strategic basis of the "emerging" Local Plan (i.e. the draft currently awaiting the Inspector's findings); even if the proposed development was not in conflict with either current or proposed plans, its size, nature and location does not make it eligible to be brought forward for early release, i.e. to be given consent now in advance of full consideration after confirmation (as and if amended after the Inspector's report) and implementation of the new Local Plan.

# **Technical Matters - Housing.** Whilst the planners acknowledge the importance of bringing forward an adequate supply of new housing in the City, year on year, they feel that the scale of this proposed development is too great in the context of proposed annual delivery and location.

# **Technical Matters - Landscape.** The planners note that "any development in this area will have to carefully consider the impact it will have on the wider local landscape and seek to appropriately mitigate that through sensitive design and

layout", but compliance with this important requirement has not yet been demonstrated.

**# Technical Matters - Drainage and Flood Risk.** The planners note that "it will be important that new development adequately deals with the matter of water management particularly in relation to surface water run-off.", but compliance with this most important requirement has not yet been demonstrated.

*It is very clear that the Council's expert planning officers are not supportive of this proposed development and feel that its location, size and character are unsuitable for planning consent.*

In the planning officer's 20th January official response document they note, however: "The above observations relating to planning policy and the principle of the development have been provided on the basis of the level of information submitted and the comments contained within this policy response note represent officer opinion only, at the time of writing, without prejudice to the final determination of the submitted application."

**The significance of this is that the final decision will lie with Council Members, particularly the Planning Committee. Opportunity still exists for Lancaster residents to make their views on this proposed development clear to Council members, and particularly Planning Committee members. The Planning Committee will take into account their own planning officers' views and advice, but are not obliged to follow it. It is therefore important that members of the public having a view on this proposed development should make their views clear to Council members at every opportunity and before the meeting at which this application will be determined.**