

SUMMARY
PROOF OF EVIDENCE
on
TRAFFIC & TRANSPORT
I/TR-01A

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&
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On Behalf of It's Our City

Planning Inquiry APP/A2335/V/09/2095002

Canal Corridor North Site, Lancaster

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- 1 The development proposals represent a totally inappropriate car-dependent development with the overwhelming budgetary and design elements focussed on encouraging car use to this site
- 2 The development proposals are contrary to formal policy in DASTS, PPS1 and the climate change supplement to PPS1, PPG13, the local plan (strike through edition), the Local Development Framework Core Strategy, the development brief (SPG8) and DfT Transport Assessment Guidance
- 3 The development proposals strike a blow at the high level UK government commitment to reduce greenhouse gases. The UK government quite rightly makes a great deal of its success as the first country in the world to put on a statutory basis a legal obligation to reduce greenhouse gases. This is simply not compatible with a proposal that increases them especially when that increase is based on poor quality design, low prioritisation of sustainable modes and a poor grasp of policy designed to promote the sustainable modes. It is possible to produce a low carbon development and this has not been done
- 4 The development proposals represent a significant lurch in the direction of encouraging car use. A new link road and an 800 space car park which provides 500 more spaces than is currently present on site is a strong message aimed at car users to use their cars for the shopping trip. It is hard to imagine a more severe case of contradiction with PPG13 and the requirement to reduce car use.
- 5 The lack of detailed attention to walking, cycling and public transport in their overall context of links across the city, links to the bus station and across the site demonstrate a degree of neglect for the sustainable modes which is completely at odds with current policy and guidance
- 6 The development will add significantly to traffic congestion, queue length air pollution, community severance, rat running and a lower quality of life for surrounding areas that provide homes and schools for over 6000 people.
- 7 No Party to the Inquiry disputes that the proposed development will increase traffic volumes in Lancaster.
- 8 Lancashire County Council has expressed its concerns about a development that will add extra traffic in an already very congested highway network: “The inclusion of the canal corridor development and committed developments will result in congestion levels increasing significantly at a number of locations within the City Centre, such as the northbound gyratory approach arms and surrounding area during the peak periods”

- 9 The “surrounding areas” include a densely populated part of Lancaster (Ridge, Freehold, Lower Bulk) already suffering severe reductions in quality of life because of the volume of traffic and associated rat running on Ridge Lane, Keswick Rd, Ullswater Rd and, Bulk Rd and Derwent Rd. It is not acceptable that an already poor quality of life should be made worse by the canal corridor development.
- 10 The Transport Assessment (Ref CD17) TA falls short of the requirements of the City Council's Development Brief for the Canal Corridor North ((SPG 8) (Ref CD65) as it does not indicate clearly by what extent traffic volumes will increase as a result of the development.
- 11 The base data and method employed by the TA predicts that at least 14,208 extra shopper's vehicles will be attracted to the city by the development in any given week, yet this figure is omitted from the TA.
- 12 The method employed by the TA to predict increased traffic volumes as a result of the development is flawed as the base data itself is flawed.
- 13 A proper like for like comparison between existing and proposed net retail floorspace predicts that 21,240 extra shopper's vehicles will be attracted to the city by the development in any given week.
- 14 The standard of the TA is questionable in terms of the way day data and conclusions are presented.
- 15 No account is taken by the TA of changes to the 'increased attractiveness' of Lancaster after the development is opened.
- 16 The base data used to predict increased traffic volumes is inadequate.
- 17 The promotion of such a development against the lamentable lack of progress with air quality actions in the city centre AQMA is to be regretted and shows a lack of consideration for citizens who look to the local authority to improve air quality. No actions have been taken by the city council to improve air quality and no development generating extra traffic should be permitted unless and until such actions are actually implemented. To do less is to condemn residents to poor health
- 18 The TA supporting the development proposals is woefully inadequate. It does not follow guidance, it does not give full weight to multi-modal data and the importance of walking and cycling in Lancaster, it does not include a travel plan and it does not use widely accepted methodologies for calculating trip generation e.g. TRICS
- 19 The lack of a travel plan is directly contrary to official guidance and deprives the Inquiry of the opportunity to frame and discuss planning obligations that could deliver the government's agenda known as “Smarter Choices” and Traffic Demand Management. It is totally unacceptable to

fob off the Inquiry with the idea that approval should be given and then a travel plan will follow at some point in the future

- 20 The need for a travel plan to be associated with the applications has been communicated to the developer by the County Council
- 21 The development proposals represent a fundamental failure to recognise the dynamics of how cities work. There is an existing city centre in Lancaster and it has pedestrian and cycle access, a heavily used bus network focussed on Common Garden St, George St and the bus station itself and a network of car parking provision encircling the city. The future of sustainable transport and regeneration depends on an integrated approach to the totality of movement and access in the city as a whole. A totally integrated approach is needed to car parking, pricing, access, walking, cycling and public transport provision across both the city centre and the new development and this has not been done. This brings many risks including a blow to city-wide regeneration aspirations and the success of its wider modal split aspirations in the direction of the sustainable modes. The lack of integration with total city-wide thinking represents a dismal failure of the planning process and the applications should be rejected.