

# **STRIDE TREGLOWN**

## **Appendix 2 – Scoping Responses**

---

**Environmental Statement**

Ellel Holiday Village, Lancaster



Contact: Mr Mark Cassidy  
Telephone: 01524 58236290  
Email: mcassidy@lancaster.gov.uk  
Website: www.lancaster.gov.uk  
Our Ref: 20/00064/EIO



M Capital Investment Partners  
C/O Stride Treglown Ltd  
Promenade House  
The Promenade  
Clifton Down  
Bristol  
BS8 3NE

**Directorate for Economic Growth and  
Regeneration**

PO Box 4  
Town Hall  
Lancaster  
LA1 1QR

6 April 2020

Dear Sir/Madam

**ENVIRONMENTAL IMPACT ASSESSMENT SCOPING REQUEST FOR THE CREATION OF A HOLIDAY VILLAGE/LEISURE DESTINATION COMPRISING CIRCA 400 LODGES (TOTAL AREA 28,000 M<sup>2</sup>), 100 STAY PODS (TOTAL AREA 2000 M<sup>2</sup>), A MARKETPLACE (CIRCA 1500M<sup>2</sup> RETAIL SALES AREA, 1400M<sup>2</sup> FOOD AND BEVERAGE, 500M<sup>2</sup> SERVICING/STORAGE, 100 M<sup>2</sup> ANCILLARY FACILITIES) UP TO 25 ARTISAN PODS (1,000M<sup>2</sup> OF NEW EMPLOYMENT SPACE), A HOTEL (100 BEDROOMS, 150 SEAT FUNCTION SPACE AND ASSOCIATED BREAK OUT SUITE, RECEPTION AND ANCILLARY SPACES, TOTALLING 3,700 M<sup>2</sup>), A VIRTUAL REALITY EXPERIENCE BUILDING (CIRCA 750M<sup>2</sup>) AND ASSOCIATED CAR PARKING AND LAND RE-MODELLING**

This Scoping Opinion is based on information provided to Lancaster City Council (as Local Planning Authority 'LPA') by Stride Treglown together with the comments and opinions resulting from consultation with other statutory and non-statutory consultees. It has been prepared and issued by the LPA in response to this request as part of the Environmental Impact Assessment process. We apologise for the delay in the response of this opinion, and it is important to note that to date not all consultees have responded to the request. However, the Local Planning Authority has made an informed judgement based on those matters raised previously with respect to the site.

The Environmental Impact Assessment process attempts to ensure that any significant effects of a range of environmental issues that might result from a particular development are understood as far as possible and taken into account prior to any planning decision being taken. The 'Scoping' process is intended to identify all of the significant environmental effects that a development project might cause, so that those significant effects can be investigated in detail in the Environmental Statement (ES).

The effects/impacts of the proposed development on a range of environmental topics has to be assessed in terms of the characteristics, scale and significance, together with their timing. Where the potential for significant environmental effects have been identified as part of a Scoping exercise, the ES should propose mitigation and monitoring measures.

**Site description**

The site is located to the south of the village of Galgate on the southern outskirts of the district of Lancaster and is essentially split into two distinct and separate parcels of land which are separated by the Lancaster Canal.

The eastern parcel of land is a rectangular shape in the region of 18 hectares and lies immediately to the west of the A6, adjacent to the Hampson Green Roundabout with the existing access to Ellel Grange bisecting the southern part of the site.

The main site is in the region of 51 hectares and lies to the west of the Lancaster Canal and immediately south of the 'Glasson Branch' canal. The sites are currently grazed by livestock with a diverse landscape of woodland, drumlins and ponds. There are existing buildings on the site in the shape of Home Farm and associated stables and outbuildings.

## **Proposed Development**

The scheme proposes the creation of a new holiday village/leisure destination comprising circa 400 holiday lodges (total area 28,000 m<sup>2</sup>), 100 stay pods, a new marketplace, hotel and associated facilities.

Associated infrastructure in the form of a new access road is proposed off the Hampson Green Roundabout, though access will also be afforded via the existing access that serves Ellel Grange.

Little in the way of indicative plans has been supplied as part of this request, and therefore this Scoping Opinion has been prepared on this basis of the limited information provided, given consultees can only comment on what is before them.

## **History**

There is no relevant planning history to the site although the applicant has engaged in pre-application discussions with the Local Planning Authority since 2017. A scheme which was residential led was submitted for pre-application consideration in 2018, and the applicant has been involved in promoting the site via the Local Plan.

## **Consultation**

During the Scoping Process undertaken in January to March 2020, further consultation was undertaken with the relevant statutory agencies and authorities and other relevant parties seen to have an interest in the proposal and/or having expertise in the environmental issues relevant to this site.

In accordance with the EIA regulations, the following bodies were consulted (copies of their responses received can be accessed on Public Access via the Council's website). Unfortunately not all consultees have provided comment for input into this Scoping response.

- Lancashire County Council Public Rights of Way;
- Ramblers Association;
- British Horse Society;
- Historic England;
- Conservation Officer;
- Lancashire County Archaeological Advisory Service;
- Ellel Parish Council;
- Thurnham Parish Council;
- Wyre Borough Council;
- Environment Agency;
- Lead Local Flood Authority;
- Greater Manchester Ecology Unit;
- Environmental Health;
- United Utilities;
- City Council Planning Policy;
- Forest of Bowland Area of Outstanding Natural Beauty office;

- Royal Society for the Protection of Birds;
- City Council Tree Protection Officer;
- City Council Public Realm Officer;
- Natural England;
- Canal and Rivers Trust;
- County Highways;
- Highways England;
- Marine Management.

Arising from the consultation responses at Appendix 1, the following topics were identified for investigation and assessment as part of this Scoping Process and any subsequent Planning Application.

- Access Strategy and Highway Impacts;
- Landscape and Visual Impacts;
- Ecological Impacts;
- Air Quality;
- Agricultural Land (Soils);
- Ecological Issues (Protected Species, Impact on the Morecambe Bay SPA and SAC);
- Access and Recreation;
- Contaminated Land;
- Noise;
- Heritage related matters;
- Tree Protection Measures;
- Public Open Space Provision; and
- Flooding and Drainage.

### **Scope and Structure of the Environmental Statement**

Reference should be made to Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 'Information for inclusion in environmental statements' requires that an Environmental Statement should include at least the following;

Part 1 – Information describing the project including the information on the location of the development;  
 Part 2 – A description of the reasonable alternatives considered by the developer; this needs to look at the tourism side and also the commercial elements of the scheme. Given the uses proposed sequential tests and retail impact assessments will be required, but given the submission is lacking in detail it is hard to comment on this more fully at this stage;

Part 3 – A description of the relevant aspects of the current state of the environment (baseline scenario);

Part 4 – A description of the factors specified in Regulation 4(2) likely to be significantly affected by the development;

Part 5 – A description of the likely significant effects of the development on the environment;

Part 6 – A description of the forecasting methods or evidence used to identify and assess the significant effects on the environment;

Part 7 – A description of the measures envisaged to avoid, prevent, reduce, or if appropriate offset identified significant adverse effects on the environment;

Part 8 – A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks to major accidents and/or disasters which are relevant to the project concerned;

Part 9 – Non-technical summary of the information; and

Part 10 – A reference list detailing the sources used for the descriptions and assessments included in the Environmental Statement

It should be noted that the format for the ES is not defined and not all the topics will be applicable to the proposal site.

Following a review of the consultation response the Local Planning Authority concludes that the following topics should be included as chapters within the Environmental Statement:

- 1) Introduction
- 2) Environmental Impact Assessment process
- 3) Site and Project Description
- 4) Consideration of Alternatives
- 5) Planning Policy Context
- 6) Landscape and Visual Impacts – The ES should fully investigate the landscape and visual impacts in accordance with the methodology as contained within the Scoping Report (Stride Treglown Scoping Report dated 21<sup>st</sup> January 2020). We would add that a viewpoint should be included from footpath 18, 150 metres to the north of the Motorway slip road). With respect to the Glasson Branch of the Lancaster Canal due to the sensitivity of the canal corridors that additional viewpoints should be assessed on the stretch of canal south of the Listed Bridge 85. Best practice guidance would indicate that a Zone of Theoretical Visibility plan should be included within any submission and we would request that this is included as this will inform whether some of the viewpoints selected will indeed potentially experience views of the development. The viewpoints selected would appear appropriate though we would also ask that footpath 1-18 is included which sits between the motorway junction and the A6 and does offer views across the site. We would advocate the use of photomontages even based on indicative layouts as these are useful visual tools. They not only aid officers, but critically help inform the Planning Regulatory Committee when an application is presented to them.
- 7) Ecological Matters – we agree that Ecology should be included within the Environmental Statement, and given the size of the site there is the potential for there to be significant implications for the proposal regarding ecology. The uplift in the local population may cause increased recreation pressure on the coastline. This indirect impact should be considered in the ES. The site may act as functionally linked land to Morecambe Bay, meaning that birds that use the Bay may also use the site. This impact should be considered in the ES. This will require wintering bird surveys to be carried out. The observations of Natural England and Greater Manchester Ecology Unit should be incorporated into the assessment.
- 8) Highways and Transportation (in addition to those matters contained within Section 3.3 of the Scoping Request), the assessments and methodology as put forward by Highways England and the Highway Authority will need to be adhered to for the preparation of the Highways and Transportation chapter. The development has to examine the in-combination affects associated with this development and the wider Garden Village and South Lancaster Allocations.
- 9) Air Quality (given the proximity of the proposal to the Galgate's Air Quality Management Area)
- 10) Cultural Heritage (please note the observations from Historic England, the City Council's Conservation Team and Lancashire County Council Specialist Advisory Services (Archaeology).
- 11) Climate Change Adaption – this is an important component of the Environmental Statement as to how the development will be more climate resilient and make use of more low carbon resources.
- 12) Description of the measures envisaged to prevent, reduce and where possible offset any significant adverse impacts
- 13) A non-technical summary of the information provided in the Environmental Statement.

An indication of any difficulties (technical weaknesses or lack of know how)

Note: Whilst the LPA broadly agrees with the Scope of the ES as proposed, it is considered that other matters which have been requested by consultees are not necessary (in the opinion of officers) to be assessed within the scope of the EIA regulations but their advice is of course relevant to any supplementary documents/appraisals submitted in support of the planning application and their advice

should be considered with respect to any potential planning submission and you are strongly advised to review the comments made from the statutory consultees.

Determining the significance of any impacts can be contentious as it may involve judgements and expert interpretation. It is therefore prudent that significance is established using transparent methodologies based on defined, up to date and recognised standards, legislation, policy and expert opinion. The ES should therefore be explicit and specifically include reference to methodologies used.

### **Environmental baseline**

The ES will need to establish accurate baseline information and provide an analysis of impacts from the life-cycle of the project from construction through to occupation of the residential dwellings. The environmental baseline should be established through consultation by the applicant with the relevant statutory and non-statutory bodies.

### **Cumulative Effects**

Assessments need to consider cumulative effects of impacts. You will be aware that the local authority is currently waiting on the Planning Inspectorate's report in terms of the LPA's local Plan. We would expect that any future proposal has to include any allocated sites in South, East and North Lancaster.

Mitigation measures proposed in the ES should be detailed within a schedule of environmental commitments that could assist in drafting planning conditions and/or planning obligations.

### **Non-Technical Summary**

A credible ES needs to demonstrate that it is well written, well structured, objective, transparent and scientifically rigorous. The non-technical summary should provide sufficient information for the non-specialist reader to understand the main environmental impacts of the proposal without reference to the main ES. The non-technical summary should be a standalone document which includes a summary of the description of the development, the main alternatives considered, and the aspects of the environment likely to be significantly affected by the development, the likely significant impacts and the mitigation measures to be implemented. It should include maps and the site layout plan.

This Scoping Opinion shall not preclude the LPA seeking the developer to submit further information in connection with any submitted development application in accordance with Regulation 25 of the 2017 Environmental Impact Assessment (EIA) Regulations.

Yours faithfully,

*Mark Cassidy*

**Mr Mark Cassidy**  
**Head of Planning and Place**



**Canal &  
River Trust**

Making life better by water

Lancaster City Council  
PO Box 4  
Town Hall  
Lancaster  
Lancashire  
LA1 1QR

Your Ref 20/00064/EIO

Our Ref CRTR-PLAN-2020-29078

Thursday 6 February 2020

Dear Sir/Madam

Proposal: Scoping opinion for the creation of a holiday village/leisure destination comprising of; circa 400 lodges (total area 28,000 m<sup>2</sup>), 100 Stay Pods (total area 2000 m<sup>2</sup>), a Marketplace (circa 1500m<sup>2</sup>) retail sales area, 1400m<sup>2</sup> F&B, 500m<sup>2</sup> servicing/storage, 100m<sup>2</sup> Ancillary facilities) up to 25 artisan pods (1,000sqm of new employment space), a Hotel (100 bedrooms, 150 seat function space and associated break out suite, reception and ancillary spaces, totalling 3,700m<sup>2</sup>) a Virtual Reality Experience building (circa 750m<sup>2</sup>) and associated car parking and land re-modelling.

Location: Home Farm, Ellel Grange, Main Road, Lancaster

Waterway: Lancaster Canal

Thank you for your consultation.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

The Trust owns and maintains the Lancaster Canal which passes through the heart of the development site and the Glasson Branch of the Lancaster Canal, which passes along the northern boundary of the site.

The Trust would wish to see any potential impacts on; our waterway users (boaters, towpath users and wildlife); infrastructure (the canal, bridges, locks, culverts, embankments or cuttings etc); or the habitats that our waterway support; fully identified and addressed within the Environmental Statement and supporting application documents. It would be important to maintain our waterways and navigational safety along the canals both during construction and operation of the development.

In relation to the specific topic area listed in the draft structure for the Environmental Statement we comment as follows:

#### Chapter 4 – Ecological

There is no reference to the Lancaster Canal & Glasson Branch being a Biological Heritage Site and a County Wildlife Site. Any potential impact on these designations must be taken into account in the assessment.

#### **Canal & River Trust**

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN

T 0303 040 4040 E [canalrivertrust.org.uk/contact-us](http://canalrivertrust.org.uk/contact-us) W [canalrivertrust.org.uk](http://canalrivertrust.org.uk)

The waterways potentially support rich biodiversity and the development could have an adverse impact on the ecology of the waterway. As highlighted below water quality must be protected during and post works, with consideration given to protecting the wildlife corridors along and to the canal from, water pollution, air pollution and light pollution during construction and during the operation of the development.

The canal corridor should be assessed for the presence of bats, especially for foraging and commuting.

The potential impacts on the waterway corridor should be fully considered within the environmental statement and detail appropriate mitigation.

#### Chapter 5 - Landscape and Visual Impacts

There are potentially significant temporary and permanent visual effects to the area during and post construction which would affect the current character, tranquillity and experience of the waterways as well as permanent visual effects following completion of the development. This should be fully considered and addressed within the Environmental Statement.

The LVIA does not identify the canal or its designated structures in terms of potential visual effect and also states that 'none of the bridges are within the site' - although factually correct in terms of the Glasson Branch, the red line plan in appendix 1 appears to include part of the Lancaster Canal and the Double Bridge no.85. In any case the fact that the development is immediately adjacent to the canal corridor means they should still be fully considered in any impact assessment.

The waterway and its users (boaters and towpath users) should be recognised as visual receptors with high sensitivity within the LVIA. The current canal corridor is predominantly within an open setting and any new development should seek to enhance the corridor, maintaining openness where appropriate whilst creating a 'positive' edge to the canal.

The text refers to Figure 1, but such a figure does not appear in the document or included as supporting information. In the absence of this it is unclear where the viewpoints would be. We consider it crucial that viewpoints selected should include at least one viewpoint from each stretch of canals and given the listed designations should include at least one for each of the bridge/lock structures too.

It is unclear how the applicant has concluded that photomontages are not anticipated to be required. Given the scale and scope of the proposal we would expect these to be included. We would suggest that photomontages should be required to illustrate the visual change/impact.

Given the context to the site there is opportunity to mitigate the visual impact of the development from the waterway in terms of design and layout and providing a positive relationship with the canal (where appropriate).

The details of any necessary mitigation during construction or future operation should however be considered and included. **The suggested potential mitigation includes 'visual screening'** (using landform and/or vegetation). Any planting should be native species.

The impact of lighting within the development should also be considered as part of the LVIA. This should cross-cut with the ecology chapter in terms of the impact on protected species which would be particularly susceptible to lighting.

#### Chapter 6 -Transport

The proposal both during construction and operation would see a considerable uplift in traffic in the area. Clearly the development would also result in quite a significant uplift in usage of the canal towpath. The development would also be relying on the towpath to form part of the sustainable transport options for the site. Whilst we welcome an uplift in usage of the canal towpath, it would need to be fit for purpose and the towpath would

#### **Canal & River Trust**

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN

T 0303 040 4040 E [canalrivertrust.org.uk/contact-us](http://canalrivertrust.org.uk/contact-us) W [canalrivertrust.org.uk](http://canalrivertrust.org.uk)

require to be upgraded to support the level of usage envisaged as a consequence of the development. The development should be required to provide this.

The canal towpath should be considered as a sensitive receptor as part of the assessment as outlined in the assessment overview

It is understood that the main access to the proposed development would be via Bridge 84 which is an accommodation bridge. This bridge should be assessed for vehicle loading on the arch and would advise that a Arch Assessment is carried out by the developer to prove that the bridge is capable of the additional loading caused by the increase in usage and the use of construction traffic. If there is any intention to use Bridge 85 which is also a farm accommodation bridge and within the development. It will also require an assessment. There are a number of bridges within close location which are prone to vehicle damage: Bridge 79 & Bridge 81 and an increase of construction traffic and general traffic could increase the risks of further bridge strikes and should be considered in the assessment.

## Chapter 7 – Cumulative Impacts

In terms of the cumulative impact of the development, then the other proposed development around Galgate and at Bailrigg Garden Village should also be considered and assessed. The quantum of development proposed would significantly alter the character of the waterway corridor.

As outlined above, the development as well as others, would see a significant uplift in terms of towpath usage **along the Lancaster canal. The Trust maintains its towpaths in a 'steady state', i.e at present the towpath in the vicinity of the site is grassed/unsurfaced and it would be maintained as such. The current towpath would not be suitable for the intended uplift in usage. The assessment should consider the cumulative impact of development on the canal corridors and provide appropriate mitigation.**

In terms of the standalone documents which are proposed, we would comment as follow:

### Flood Risk and Drainage

The Flood Risk assessment should also consider the potential for overtopping of the canal, particularly the Glasson Branch which has very short pounds (distance between locks) along the northern boundary of the site. A detailed survey of the canal bank level each side should be included in their site survey to determine where the low points are, if any, compared to rest of canal pound. As these would be the points most susceptible to flooding.

The canals could be considered for their acceptability to discharge surface water from the site. The Trust is not a land drainage authority and as such discharges are not granted as of right, where they are granted they will usually be subject to completion of a commercial agreement.

Depending on the final drainage methods of the new development, this could have a significant impact on the structural integrity, water quality and the biodiversity of waterways. It is important to ensure that no contaminants enter the waterway from surface water drainage. This should be fully detailed in a Construction Environment Management Plan (CEMP) submitted with any application. In the event that any discharge is proposed to the canal then details on mitigation would be required with the highest level of protection and include attenuation of the peak flow rate and removal of pollutants to ensure watercourses are fully protected.

### Cultural Heritage

Although only a brief paragraph has been provided there has been no mention of the Lancaster Canal and Glasson Branch and the associated heritage assets which may be impacted by the development. The Canals should also be considered as non-designated heritage assets.

## **Canal & River Trust**

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN

**T** 0303 040 4040 **E** [canalrivertrust.org.uk/contact-us](http://canalrivertrust.org.uk/contact-us) **W** [canalrivertrust.org.uk](http://canalrivertrust.org.uk)

Para 190 of the NPPF requires the local authority to take into account the impact of the proposal on any heritage assets including where the proposal affects the setting of the heritage asset in order to avoid conflict between the heritage assets conservation and the proposal. Therefore, the proposal must take into account the direct impact on bridges 84 and 85 and the impact on the setting of bridge 1, bridge 2, lock 1 and lock 2 on the Glasson Branch. All these structures are listed, Grade II. The report should also consider the use of these heritage assets (bridges) as part of the access arrangements for the site and any interventions that may be required to enable their use. The transport assessment indicates that the site might generate over 3,000 trips into and out of the site each week during the summer months. Presumably these would cross either bridge 84 or bridge 85. Both these bridges are classified as accommodation bridges. The cultural heritage report must consider the impact on the canal's heritage structures including physical impact and impact on the setting whether they are inside or outside the red line. This should include any mitigating actions which would be taken to protect the setting of the canal and its structures and to protect the bridges used for access from physical harm during construction and operation. The report should also assess any interventions that may be required to these bridges to ensure they are fit for purpose.

### Arboricultural

The removal of trees or works to retained trees in close proximity to the canal, including on/near embankments and cuttings should take into account the stability of the canal infrastructure. For example, the treatment of tree roots which may be offering stability.

### Noise and vibration

The proposal both during construction and future operation has the potential to impact on users of the waterway users from noise and vibration. This includes boaters (both residential and leisure users) and recreational users along the canal towpaths. They should be considered in any mitigation.

As the application site is adjacent to the canals and a number of assets, including locks and bridges. Any construction work in close proximity to the canal infrastructure has the potential to adversely affect the structural integrity of the canal and supporting structures. It is therefore essential that structural integrity is not put at risk as part of any development proposal, including excavations for foundations or vibrations from plant or machinery which could, in the worst case scenario, result in the failure of the canal or damage to locks and bridges. The report should include appropriate mitigation in terms of protecting these assets. Any works should also be carried out in accordance with the Trusts Third Party Works Code of Practice and we would welcome this being acknowledged.

### Air Quality

The canals should be identified as sensitive receptors particularly with regards to dust emissions during construction. Mitigation measures should be set out to ensure that regular checks of the waterways are undertaken during construction and for a period following completion of the works. This should be covered in the CEMP.

The waterway users should be identified as sensitive receptors that may be affected. It should be clarified that users of the waterway for recreation, boaters, both leisure users and residential along with pedestrians and cyclists on the towpaths are sensitive receptors both during construction and future operation of the development.

Any residential moorings in the locality should also be afforded equal consideration as a sensitive receptor.

## **Canal & River Trust**

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN

T 0303 040 4040 E [canalrivertrust.org.uk/contact-us](http://canalrivertrust.org.uk/contact-us) W [canalrivertrust.org.uk](http://canalrivertrust.org.uk)

## Ground conditions

The contamination reports should consider the canals as receptors as part of any assessment which would be susceptible to pollution. The location and sealing of any existing drainage across the site to the canal should also be considered and addressed.

The report should also consider ground conditions in terms of construction work in close proximity to the waterway infrastructure which could potentially adversely affect the structural integrity of the waterway. The canal is lower than the application site and it is essential that the structural integrity of the canal infrastructure is not put at risk as part of any development proposal, including excavations, earthmoving or vibrations from plant or machinery which could, in the worst case scenario, result in the failure of the canal.

Land stability and the consideration of the suitability of development with regard to ground conditions are material planning considerations as set out in paragraphs 170 (e) and (f) and 178 of the National Planning Policy Framework (NPPF) and that the responsibility for securing a safe development in terms of land stability rests with the developer (para 179). This is the subject of more detailed discussion in the National Planning Practice Guidance (PPG).

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

**Tim Bettany-Simmons MRTPI**  
Area Planner

Tim.Bettany-Simmons@canalrivertrust.org.uk  
07342 057926

## **Canal & River Trust**

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN  
**T** 0303 040 4040 **E** [canalrivertrust.org.uk/contact-us](mailto:canalrivertrust.org.uk/contact-us) **W** [canalrivertrust.org.uk](http://canalrivertrust.org.uk)

Director of Economic Growth  
and Regeneration  
Lancaster City Council  
PO Box 4  
Town Hall  
Lancaster  
LA1 1QR

Tel 01772 533734  
Email [developeras@lancashire.gov.uk](mailto:developeras@lancashire.gov.uk)

Your ref 20/00064/EIO  
Our ref D1/00064/EIO/DRW1  
Date 11<sup>th</sup> February 2020

(FAO DM Technical Team)

## EIA SCOPING OPINION

**Planning Application No: 20/00064/EIO**

**Location: HOME FARM, ELLEL GRANGE, MAIN RD, GALGATE, LANCASTER, LA2 0HN**

**PROPOSAL: SCOPING OPINION FOR THE CREATION OF A HOLIDAY VILLAGE/LEISURE DESTINATION COMPRISING OF: CIRCA 400 LODGES (TOTAL AREA 28,000 SQM), 100 STAY PODS (TOTAL AREA 2,000 SQM), A MARKETPLACE (CIRCA 1,500 SQM RETAIL SALES AREA, 1,400 SQM F&B, 500 SQM SERVICING/STORAGE, 100 SQM ANCILLIARY FACILITIES) UP TO 25 ARTISAN PODS (1,000 SQM OF NEW EMPLOYMENT SPACE), A HOTEL (100 BEDROOMS, 150 SEAT FUNCTION SPACE AND ASSOCIATED BREAK OUT SUITE, RECEPTION AND ANCILLIARY SPACES, TOTALLING 3,700 SQM), A VIRTUAL REALITY EXPERIENCE BUILDING (CIRCA 750 SQM) AND ASSOCIATED CAR PARKING AND LAND RE-MODELLING**

Dear Sir

Thank you for your letter requesting scoping opinion observations for the above proposal in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

This scoping opinion response considers only highways and transportation matters identified as potentially significant issues that should be considered in determining the subject matter of the EIA and any subsequent planning application.

The request for a formal scoping opinion is supplemented with an EIA Scoping Request Report. This report sets out the key components of the project that will need to be assessed in the Environmental Statement. Section 3.3 – Transport, of the Scoping Report acknowledges that the ES will quantify the effects that the proposed development will have on the surrounding transport network during construction and operational phases.

The Scoping Report highlights that a Transport Assessment (TA) and Framework Travel Plan will be produced to support a forthcoming application for development and includes, in Appendix 4, a Transport Assessment Scoping Study prepared by consultants SK Transport.

---

**Phil Durnell**

Director, Highways and Transport,  
Lancashire County Council

Cuerden Mill • Cuerden Way • Bamber Bridge • Preston • PR5 6BS

## Background

Reference is made in Section 3.3 of the Scoping Report to discussions that have already been held with LCC to agree the study for the assessment. LCC's Highway Development Support Team Manager has been working with Lancaster City and Developers to support the emerging Local Plan, providing advice and guidance on highway elements with regard to development scale, location and master planning matters. It is my understanding that the discussions referred to in section 3.3 of the Scoping Report took place some years ago and were associated with proposed development on this site that also included a mixed use development and circa 950 dwellings.

I am aware in regard to previous discussions with county council highways (and the somewhat different proposal) that site and access principles were discussed. Also discussed, given the sites location, was a need to carefully consider the sites sustainability credentials and its ability to satisfy NPPF. At that time and with regard to site access, it was noted that one opportunity to be further explored was the sites ability to commence and part provide a linking road between the corridors of the A6 and the A588 in land controlled by the applicant,

As local highway authority (LHA) Lancashire County Council welcomes and encourages discussions before a developer submits a planning application. These discussions result in better quality applications which stand a stronger chance of a successful outcome and help speed up the decision making process after submission. Lancashire County Council (LCC) operates a service providing pre-application highway advice for development proposals and project work. In order to provide this service the County Council only recovers those costs associated with the discussions.

## Transport Assessment

As noted above a Transport Assessment (TA) Scoping Study has been included with the documentation submitted as part of the Scoping Opinion request. However, at this stage it is not my intention to provide detailed comments on the requirement of all elements of the Transport Assessment as part of this scoping opinion response.

Further discussion on the current proposals between the applicant and the LHA would enable identification and agreement of key parameters required for the necessary Transport Assessment (TA). There are a number of issues in particular that will need to be clearly assessed to the satisfaction of the LHA and addressed within the Transport Assessment. The supporting information required for the proposed development site must include:

- a suitable access strategy, including examination of all opportunities to the wider network and other corridors;
- a comprehensive Transport Assessment utilising up to date evidence to assess the impact on the local transport network; The TA should establish up to date base and future year transport conditions;
- a full cumulative assessment of impact will be required in order to fully assess the impact on the local transport network; there are a significant number of committed and emerging developments in the A6 corridor in the vicinity of the proposed site, for example the larger sites include Bailrigg Garden Village, Lancaster Innovation Campus (former Science Park), University proposals and Booths food retail amongst others;
- validation of the traffic count data collected and traffic modelling work;
- Highway network operational assessments

The scale of the proposal will result in impact across the local transport network. LCC Highways will be able to agree, as part of pre-application advice, an acceptable approach in regard to the network to be assessed. This will include use of proprietary software (which should be appropriate with regard to the complexity of the network to be assessed and may include microsimulation);

- an Interim Travel Plan;
- details of all measures and mitigation necessary to establish sustainable development in line with the latest local and national planning policy (NPPF); this development proposal is on the edge of the built environment, therefore, high quality provision from this development to the existing local network for pedestrians and cyclists will be important.
- Impact on Public Rights of Way (PROW) - there are a number of PROW that run through or adjacent to the proposed site. I would expect to see full assessment of any proposals that impact existing PROW and associated mitigation measures;
- provision for pedestrians and cyclists, connecting the proposal to the wider community; demonstrating the site will be supported by a good public transport service that is within acceptable walking distances and linked by safe and direct footpaths, with bus services at a frequency to support the needs of the site with links to a number of key suitable destinations
- an acceptable level of access to public transport; and
- details of the sites amenity provision, linking directly to site sustainability.

Overall, with regard to the above, I consider that this site would warrant further highways pre-application discussions between the applicant and the LHA.

#### Sustainable Urban Drainage Systems (SuDs)

LCC are the Lead Local Flood Authority (LLFA), as such I would refer to the LCC Flood Risk Assessment Teams comments which, as a statutory consultee, I would expect to be provided under a separate response. Clearly, the development of the site should consider the requirements likely to be asked for in support of a SuDs drainage scheme. These considerations may significantly affect the site layout/design to include for the likes of swales, storage ponds etc. to control run off rates in accordance with SuDs guidance.

#### In Summary

This scoping opinion response considers the highways and transportation matters identified as potentially significant issues that should be considered in determining the subject matter of the EIA and any subsequent planning application.

The Transport Assessment to be developed will establish the full impacts of the overall proposals and therefore the measures and mitigation necessary to deliver sustainable development in line with the latest local and national planning policy (NPPF). The TA must include:

- A suitable access strategy, including examination of all opportunities;
- Highway network operational assessments
- Provision for pedestrians and cyclists, connecting the proposal to the wider community;
- An acceptable level of access to public transport; and
- the sites amenity provision, linking directly to site sustainability and satisfying the NPPF

I hope the above is of assistance.

Yours Faithfully



David Watson  
Strategic Development, Highways Development Support  
Community Services, Lancashire County Council

---

**From:** developmentcontrol  
**Sent:** 20 February 2020 15:43  
**To:** dcconsultation  
**Subject:** FW: Comments on scoping request 20/00064/EIO

---

**From:** Dynamo Cycle Campaign <dynamocycle@btinternet.com>  
**Sent:** 20 February 2020 15:22  
**To:** developmentcontrol <developmentcontrol@lancaster.gov.uk>  
**Subject:** Comments on scoping request 20/00064/EIO

**This email is from an external email address**  
Do not click any links or open attachments unless you know the content is safe.  
Never disclose your password to anyone.

Hello

**Re: 20/00064/EIO | EIO Scoping request for the creation of a holiday village/leisure destination comprising of; circa 400 Lodges (total area 28,000 m2), 100 Stay Pods (total area 2000 m2), a Marketplace (circa 1500m2 retail sales area, 1400m2 F&B, 500m2 servicing/storage, 100 m2 Ancillary facilities) up to 25 artisan pods (1,000sqm of new employment space), a Hotel (100 bedrooms, 150 seat function space and associated break out suite, reception and ancillary spaces, totalling 3,700 m2), a Virtual Reality Experience building (circa 750m2) and associated car parking and land re-modelling | Home Farm Ellel Grange Main Road Galgate Lancaster Lancashire LA2 0HN**

Dynamo would like to make the following comments on the above:

(Our comments refer only to section 3.3 (Transport) and Appendix 4 of the scoping request.)

This is potentially an enormous holiday complex, with:

400 lodges  
100-125 pods  
a 100-bedroom hotel.

When fully occupied, there could be well over 1,000 people staying there, not to mention all the delivery vehicles of various sizes that will make regular service visits.

Dynamo's opinion therefore is that the developer is taking too narrow a view of the environmental impact of this complex.

In particular:

1. Despite the aim of trying to keep residents on-site (p.23), they will obviously have to travel to the complex and, once there, cannot be prevented from driving around to visit local sites. The proposed Transport Assessment (TA) will look only at impacts on the A6 and the M6, but holidaymakers will no doubt want to visit the Forest of Bowland and other local beauty spots accessible only via minor roads. The scope of the TA should be widened to include such roads

and the detrimental impact on cyclists who use them for healthy leisure rides. After all, why should a holidaymaker's leisure drive be more important a holidaymaker's – or anyone else's – leisure cycle ride?

2. The list of policy documents to which the TA will refer does not mention potential policy changes – in particular, Lancaster City Council's future plans to tackle the climate emergency. The scoping request should make provision for addressing these future policies.

3. Section 2.9, Appendix 4 states that “the proposal will include measures to allow site users and the wider community to cycle around the site and provide appropriate facilities to connect to the wider network”.

The City Council should be more directive about what it wishes to see in terms of “connection to the wider network”. Is it thinking of using the canal towpath? If so, please remember that it is currently unsurfaced and will be unlit, so it is a poor utility route. Alternatively, will there be a link to Condor Green Road?

4. And finally . . . Given that this development – if it happens – will not be finished for some years and that we need to do things differently to try to minimise the impact of climate change, why not encourage the developer to be more imaginative about this holiday complex?

Could this site not be marketed as an environmentally-friendly holiday complex where you leave the car on arrival (or even leave it at home) and spend the rest of your holiday using sustainable transport? Why not make this vast site into one from which hundreds of bicycles (both pedal cycles and e-bikes) take to the roads each day to explore the local countryside and spend their money in local businesses?

There are studies about the economic benefits of low-impact tourism like cycle-touring (e.g. section 1.5 of Sustrans report <https://www.sustrans.org.uk/media/4472/4472.pdf>) which make a good case for this vision.

If this sounds fanciful, then please stop to consider that we need to change direction to avoid the very worst of climate change and biodiversity loss. It is even more fanciful to assume that we can continue with high-impact developments in the way that we currently do.

Thank you  
Patricia Clarke  
For Dynamo Cycle Campaign  
<https://lancasterdynamo.wordpress.com>

Lancaster City Council  
Regeneration and Planning Service  
PO Box 4  
Lancaster  
Lancashire  
LA1 1QR

**Our ref:** NO/2020/112410/01-L01

**Your ref:** 20/00064/EIO

**Date:** 12 February 2020

Dear Sir/Madam

**EIA SCOPING REQUEST FOR THE CREATION OF A HOLIDAY VILLAGE/LEISURE DESTINATION COMPRISING OF; CIRCA 400 LODGES (TOTAL AREA 28,000 M2), 100 STAY PODS (TOTAL AREA 2000 M2), A MARKETPLACE (CIRCA 1500M2 RETAIL SALES AREA, 1400M2 F&B, 500M2 SERVICING/STORAGE, 100 M2 ANCILLARY FACILITIES) UP TO 25 ARTISAN PODS (1,000SQM OF NEW EMPLOYMENT SPACE), A HOTEL (100 BEDROOMS, 150 SEAT FUNCTION SPACE AND ASSOCIATED BREAK OUT SUITE, RECEPTION AND ANCILLARY SPACES, TOTALLING 3,700 M2), A VIRTUAL REALITY EXPERIENCE BUILDING (CIRCA 750M2) AND ASSOCIATED CAR PARKING AND LAND RE-MODELLING HOME FARM ELLEL GRANGE MAIN ROAD GALGATE LANCASTER LANCASHIRE LA2 0HN**

Thank you for your enquiry regarding the above proposal.

### **Environment Agency position**

We have reviewed the EIA Scoping Report for Land at Home Farm, Ellel, prepared by Stride Treglown dated January 2020. The scoping exercise has identified a series of environmental impacts to be assessed in the EIA, and our comments so far as it relates to our remit are set out below.

### **Water Quality**

The scoping does not include a full consideration of potential impacts on either surface waters or groundwater, either during the construction or operational phases of the development. The EIA should consider the potential impacts and proposed mitigation on the number of ordinary watercourses located within the site boundary, the River Cocker main river which runs in close proximity to the southern boundary of the site, and the groundwater Secondary Aquifer A that the site lies within.

### **Flood Risk**

Environment Agency  
Lutra House Walton Summit, Bamber Bridge, Preston, PR5 8BX.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

The majority of the development site is located within Flood Zone 1, with a small portion extending into flood zones 2 and 3. The Flood Risk Assessment should consider layout as the primary mitigation measure for flood risk, and ensure the development is safe for its lifetime taking account of the revised 2019 climate change allowances. The FRA should clearly demonstrate that the site will not contribute to flood risk elsewhere. The views of the Lead Local Flood Authority should be sought in relation to the management of surface water, taking into account the impact of climate change.

Yours faithfully

**Mrs Liz Locke**  
**Sustainable Places Officer**

e-mail [clplanning@environment-agency.gov.uk](mailto:clplanning@environment-agency.gov.uk)



Historic England

Mr Mark Potts  
Lancaster City Council  
Development Management Team  
PO BOX 4, Town Hall  
Lancaster  
Lancashire  
LA1 1QR

Direct Dial: 0161 2421442

Our ref: PL00676264

11 February 2020

Dear Mr Potts

Re: Home Farm Ellel Grange Main Road Galgate Lancaster Lancashire LA2 0HN  
ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING REPORT

Thank you for your letter of 27<sup>th</sup> January 2020 consulting us about the above EIA Scoping Report.

This development could, potentially, have an impact upon a number of designated heritage assets and their settings in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets. It is noted that the initial scoping report submitted to support this enquiry makes reference to having provided an overview of the possible effects of development on the environment, both historic and natural. However, it should be noted that the consideration made in relation to designated and non-designated heritage assets within this report is cursory, and falls well below what would be expected to support an application, if (or when) it is forthcoming.

A desk based assessment of the proposals indicates that there are a number of heritage assets located within, or within close proximity of, the site, the significance of which the development may impact. These can be broadly categorised as forming two distinct, but visually interrelated, character groups, these being those heritage assets associated with the Ellel Grange Estate, and those associated with the Lancaster Canal. In particular we would draw your attention to the Kings Lee Chapel, an architecturally striking building, of later



SUITES 3.3 AND 3.4 CANADA HOUSE 3 CHEPSTOW STREET MANCHESTER M1 5FW

Telephone 0161 242 1416  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)





nineteenth century construction, which exhibits a high level of architectural flair and craftsmanship. This is considered to be of exceptional architectural and historic interest, which is reflected in the fact that it is listed grade II\*.

Along with the chapel, we would also like to draw your attention to the following designated heritage assets, all of which are listed grade II:

- Ellel Grange
- Redwards
- Preston Family Mausoleum
- Lancaster Canal Junction Bridge
- Top Lock
- Second Lock Bridge
- Lancaster Canal Second Lock
- Third Lock
- Ellel Grange Bridge (no.84)
- Double Bridge (no.85)

We would also expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic Environment Record ([www.heritagegateway.org.uk](http://www.heritagegateway.org.uk) <<http://www.heritagegateway.org.uk>>) and via the relevant local authority staff. We would strongly recommend that you involve the Conservation Officer of Lancaster District Council and the archaeological staff at the Lancashire HER in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.





Historic England

It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this. In line with the relevant Historic England guidance (Good Practice in Planning Advice Note 3: The Setting of Heritage Assets) this assessment should also thoroughly and sequentially assess the contribution which their setting makes to the significance of the aforementioned assets, and what impact the development will have on this significance.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to *in situ* decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely,

Richard Broadhead  
Inspector of Historic Buildings and Areas  
Richard.Broadhead@HistoricEngland.org.uk



SUITES 3.3 AND 3.4 CANADA HOUSE 3 CHEPSTOW STREET MANCHESTER M1 5FW

Telephone 0161 242 1416  
HistoricEngland.org.uk



---

**From:** Hammond, John on behalf of developmentcontrol  
**Sent:** 06 April 2020 13:45  
**To:** dcconsultation  
**Cc:** Potts, Mark  
**Subject:** FW: App 20/00064/EIO Home Farm Ellel - Ecology response

---

**From:** Derek Richardson <derek.richardson@tameside.gov.uk>  
**Sent:** 06 April 2020 11:26  
**To:** developmentcontrol <developmentcontrol@lancaster.gov.uk>  
**Subject:** App 20/00064/EIO Home Farm Ellel - Ecology response

**This email is from an external email address**

Do not click any links or open attachments unless you know the content is safe.  
Never disclose your password to anyone.

Dear Mark

**Re** Environmental Impact Assessment Scoping consultation for the creation of a holiday village/leisure destination comprising of; circa 400 Lodges (total area 28,000 m<sup>2</sup>), 100 Stay Pods (total area 2000 m<sup>2</sup>), a Marketplace (circa 1500m<sup>2</sup> retail sales area, 1400m<sup>2</sup> F&B, 500m<sup>2</sup> servicing/storage, 100 m<sup>2</sup> Ancillary facilities) up to 25 artisan pods (1,000sqm of new employment space), a Hotel (100 bedrooms, 150 seat function space and associated break out suite, reception and ancillary spaces, totalling 3,700 m<sup>2</sup>), a Virtual Reality Experience building (circa 750m<sup>2</sup>) and associated car parking and land re-modelling

Location: Home Farm, Ellel Grange, Main Road, Galgate, Lancaster, Lancashire LA2 0HN

The site is very large and there are significant implications for the development proposal regarding Ecology.

**Impacts on designated nature conservation sites.**

The development site is within 2.5 km the of the Lune Estuary Sites of Special Scientific Interest (SSSI), Morecambe Bay and Duddon Estuary Special Protection Area (SPA) and Morecambe Bay Special Areas of Conservation (SAC) and Ramsar site, and the proposals have the potential to cause impacts on the special interests of these sites, including

- Recreational impacts; the uplift in the local population may cause increased recreation pressure on the coastline. This indirect impact should be considered in the ES
- The site may act as functionally linked to the Morecambe Bay, meaning that birds which use the Bay may also use the site. This impact should be considered in the ES, this will require wintering bird surveys to be carried out

The site includes, or is immediately adjacent to, the Lancaster Canal Biological Heritage Site (BHS) and the Ellel Grange Woods BHS. There would be a presumption against losses of, or harm to, these Local Wildlife Sites. Any potential impacts on these designated sites must be fully considered in the ES.

## **Impacts on important habitats**

The development will affect –

- Broadleaved woodland
- Ponds
- Canal
- Open grassland
- Watercourses
- Scattered trees
- Hedgerow

The ES must be informed by a comprehensive Extended Phase 1 Habitat Survey, or a survey using the UK Habitat Classification system, to identify, map and assess all semi-natural habitats present and the impacts upon them. It will be expected that the development proposals will avoid harm to important habitats wherever possible, or where avoidance is not possible for overriding reasons mitigation and compensation measures must be proposed.

## **Protected species**

The ES must thoroughly assess the impacts of the proposals on any protected or priority species which may be found on the site. Harm to protected species must be avoided, mitigated or compensated. Protected species surveys must be provided before deciding the application. On this very large site surveys must include –

- Great crested newts
- Bats
- Badgers
- Otters
- Barn owls
- Breeding birds
- Wintering birds
- Water voles

## **Ecological connectivity**

Any development must aim to retain and enhance landscape connectivity across the site to facilitate species movement. Landscape corridors and stepping stones must be an integral part of any landscape plans prepared for the development.

## **Biodiversity Net Gain**

In accordance with the requirements of the NPPF the development should be seen to achieve a Net Gain in biodiversity. To this end it is recommended that the Defra Biodiversity Net Gain Metric is used to demonstrate that net gain will be achieved.

## **Local desk-top records**

These should form a part of the ES, contact LERN, <https://www.lancashire.gov.uk/lern/>

Yours sincerely

**Derek Richardson**  
**Principal Ecologist**

Planning  
Development and Investment  
Growth

[Tameside MBC](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)

Dukinfield Town Hall | King Street | Dukinfield | Tameside | SK16 4LA

Tel. 0161 342 2593

Mobile. 07709 394502

Email Disclaimer <http://www.tameside.gov.uk/disclaimer>



Tameside MBC GCSX Mail Cessation Notice.

The Tameside GCSX mail service ([tameside.gcsx.gov.uk](http://tameside.gcsx.gov.uk)) will cease as of 27th March 2020. From this date Tameside MBC will communicate with organisations using the "@tameside.gov.uk" email address with TLS security and DMARC (SPF & DKIM) as per NCSC guidelines.

**Confidentiality:** This e-mail its contents and any attachments are intended only for the above named. As this e-mail may contain confidential or legally privileged information, if you are not, or suspect that you are not the above named or the person responsible for delivering the message to the above named, delete or destroy the email and any attachments immediately. The contents of this e-mail may not be disclosed to nor used by anyone other than the above named.

**Security and Viruses:** please note that we cannot guarantee that this message or any attachment is virus free or has not been intercepted and amended.

**Monitoring:** The Council undertakes monitoring of both incoming and outgoing e-mails. You should therefore be aware that if you send an e-mail to a person within the Council it may be subject to any monitoring deemed necessary by the organisation from time to time. The views of the author may not necessarily reflect those of the Council.

**Access:** As a public body, the Council may be required to disclose this e-mail (or any response to it) under the Freedom of Information Act 2000, unless the information in it is covered by one of the exemptions in the Act.

Planning and Housing Policy Team  
Regeneration and Planning  
Lancaster City Council  
PO Box 4  
Town Hall  
Dalton Square  
Lancaster  
LA1 1PJ

Warren Hilton  
Assistant Spatial Planner  
8th Floor  
Piccadilly Gate  
Store Street  
Manchester M1 2WD

Direct Line: 0300 470 5226

10 February 2020

Dear Sir / Madam,

**EIA Scoping request reference 20/00064/EIO: creation of a holiday village/leisure destination on land at Home Farm, Ellel Grange, Main Road, Galgate, Lancaster Lancashire LA2 0HN**

Thank you for inviting Highways England to comment on the Environmental Impact Assessment (EIA) scoping documentation associated with this proposal to establish the scope of an Environmental Statement (ES) and Transport Assessment (TA) associated with the proposed development of Land at Home Farm, Ellel, Lancaster.

On the 30th January 2020 Highways England received an email from SK Transport with an updated TA scoping document, and a pre-application document dated September 2019. It should be noted that our comments below focus on the documentation formally submitted to Lancaster City Council for consultation, dated 21st January 2020. However, where we consider the methodology proposed in the TA scoping document dated 30th January 2020 is more appropriate, we have stated this.

Highways England 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 is charged with operating, managing capacity, maintaining and improving England's motorways and major A roads, which form the SRN. It is an ambition to ensure that major roads are more dependable, durable, and most importantly – safe.

The SRN in Lancaster comprises specifically of junctions 33, 34 and 35 of the M6 motorway; a route of national significance that links the Midlands, North West England and Scotland.

It is noted that there have been no pre-application discussions with Highways England prior to the submission of this Scoping Report.

### ***Development Proposal & Site Location***

The proposed development relates to a holiday village including the following:

- Marketplace- even split between Retail and Food & Beverage (F&B);
- Hotel- approximately 100 beds with 150 seat event space and break-out suite;
- Home Farm- existing barns and houses to be refurbished with a cluster of new outbuildings, which will contain a mixed events space housing; spa, pool, gym, shops and food outlets. Stables will also be located as part of the cluster;
- Virtual Reality Zoo;
- Bike and Buggy Hire;
- Check in Booth;
- Tipi Wedding Tent;
- Artisan pods;
- Lodges- 400 units (approximately 50 x 1 bed, 250 x 2 bed and 100 x 3 bed);
- Stay Pods- 100 studio units.

The proposed development site is split into two parts with the first part being the 'Entrance Site'. This is located on the western side of the A6 Preston Lancaster Road, adjacent to Hampson Green Roundabout providing direct access to the M6 Junction 33, approximately five miles south of the centre of Lancaster. The A6 Preston Lancaster Road runs broadly parallel to the M6, and connects Lancaster, Preston, and other smaller towns/villages.

The second part, and main site of the proposed development lies to the west of the Lancaster Canal and immediately south of the 'Glasson Branch' and extends to approximately 51 hectares. The site excludes Ellet Grange but includes land to the north, west and south of it and notably, the Home Farm – a collection of farmhouse, cottages and vernacular agricultural buildings set adjacent to a walled garden.

### ***Local Plan Status***

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.

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. 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.

Lancashire County Council (LCC) has also 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. These were not included within the scope of the LTPA. **Therefore, it is not possible to make any assertions relating to the impact that these proposed mitigation measures would have on the highway network.** In addition, whilst 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).

#### ***Strategic Policies and Allocations DPD***

The proposed development site is located to the south of the proposed Lancaster South Broad Area for Growth (Policy SG1), adjacent to the Junction 33 Agri-Business Centre (Policy EC3). It falls within the confines of Policies EN3 and EN7 of the Strategic Policies and Allocations DPD, Proposed Modifications Version, August 2019.

Policy EN3 – Open Countryside designates areas of open countryside that define the rural context of the district. It states that any development proposals located within the open countryside should have due regard to all relevant policies contained within the Local Plan, in particular policies within the Development Management DPD relating to development in the rural areas.

Policy EN7 – Environmentally Important Area identifies sites within the district that have been designated at International, National or Regional level for their environmental importance. The proposed development site contains a regionally designated Biological Heritage Site.

#### ***Development Management DPD***

Of particular relevance to this proposed development is Policy DM52 of the Development Management DPD, Proposed Modification Version, August 2019. This states that that the Council will consider proposals relating to chalets, camping pods, log-cabins subject to criteria including:

- That priority is given to the re-use of previously developed sites, provided that it is not of a high environmental value. Where greenfield sites are identified it should be demonstrated that no alternative, suitable brownfield sites exist in the locality; and
- That the proposal is in an accessible location close to existing tourism and leisure attractions and has no adverse impact on the capacity of the local highways network, highway safety and other important local infrastructure.

In addition, the Council will be sympathetic towards proposals to extend opening seasons to provide holiday accommodation for the whole year. Proposals to extend the duration of opening and occupancy will be permitted where they meet criteria including:

- There are no adverse impacts on local infrastructure and highway safety; and
- The proposal is accompanied by a legal agreement stating that the accommodation will remain in visitor use only and will not be used for permanent residential occupation.

### ***EIA Scoping Document***

Appendix 3 of the scoping document sets out the methodology for the transport chapter of the ES. It states that this will consider the potential effects of the development on the transport network during construction and operational phases. It also states that the TA and Framework Travel Plan (FTP) will form the basis of the ES chapter, if required, as they will include more detailed operational and impact analysis required by Lancashire County Council (LCC) and Highways England.

We note that TA and FTP will be prepared in accordance with the requirements of the National Planning Policy Framework (NPPF), National Planning Practice Guidance (NPPG) and the DfT 'Guidance on Transport Assessment'. The method of assessing the impact on the trunk road network will acknowledge the Design Manual for Roads and Bridges (DMRB), and Circular 02/13 'Strategic Road Network and Delivery of Sustainable Development'. For non-trunk roads reference will be made to guidance set out in LCC's 'Creating Civilised Streets' and 'Lancaster District Highways and Transport Masterplan'.

As the applicant acknowledges that the development is of a level which would exceed the EIA threshold, we suggest that an ES is required, and it is stated that this will be prepared in line with the IEMA's 'Guidelines for the Environmental Assessment of Road Traffic'. Whilst somewhat dated now, it is accepted that these guidelines remain useful material for the assessment of transport impacts. **It is also recommended that a Construction Environmental Impact Plan (CEMP) is prepared.** It is essential that the ES identifies construction routes likely to be employed during the construction phase and provides forecasts of the volume of traffic likely to be generated.

We note that to establish the baseline conditions, the applicant intends to review the LPTA to identify the wider implications of the Local Plan allocations and infrastructure requirements. As previously stated, Highways England does not consider the LPTA to be a robust evidence base

and have concerns over the validity of the conclusions, along with the scope and suitability of the identified mitigation affecting the SRN.

In addition, it is noted in the scoping document that discussions have been held with LCC and Highways England to agree the study area for the purposes of the assessment, and that several junctions will be included in the TA. **Although the scope of the junctions to be assessed appears reasonable, Highways England has not had any discussion with the applicant to agree the study area or the junctions to be assessed as part of the TA.**

The ES scoping notes that the following transport effects will be considered, in line with IEMA guidance:

- Severance;
- Driver Delay;
- Pedestrian Delay;
- Pedestrian Amenity;
- Accidents and Safety;
- Dirt and Dust.

The ES scoping also includes magnitude of change criteria based upon guidance from IEMA, DMRB, DfT and LCC. This approach aligns with guidance and we would add that the assessment should consider and reflect the data produced in the TA to ensure a satisfactory conclusion.

### ***Transport Assessment Scoping Study***

Appendix 4 of the documentation submitted to Lancaster City Council is the scoping for the TA. Within this section there are references to Appendix A-D, **however we note that these appendices are not included as part of the documentation supplied as part of the consultation, and so we are unable to comment on them.**

The TA scoping for the proposed development has been prepared in line with the method set out in Lancaster City Council's 'LPTA', which was prepared by WYG to assess the impact of the Local Plan on the transport network in Lancaster. It is stated that the method adopted was developed in conjunction with LCC and Highways England, and this method represented a 'worst-case traffic scenario' being assessed and therefore forms a robust basis for the TA. As previously stated, Highways England do not agree that the LPTA is a robust evidence base, and therefore our comments address the individual elements set out rather than endorsing this approach.

Within the TA Scoping Study, the applicant proposes to use the base 2023 Do Something traffic flows set out in the WYG study. **However, the TA scoping note dated the 30<sup>th</sup> January states that the Do Something 2023 and 2033 flows will be used as the base traffic flows, we consider this latter approach to be more appropriate.**

It is stated that the TA will assess the impact of the development at ten locations, which appear reasonable. These locations are:

- A6 Preston Lancaster Road/Hampson Lane;
- A6 Preston Lancaster Road/unnamed Road;
- A6 Main Road/Stoney Lane/Salford Road;
- A6 Main Road/Hazelrigg Lane;
- A6 Scotforth Road/Ashford Road/Hala Road;
- A6 Scotforth Road/Barton Road;
- A6 Greaves Road/Bowerham Road/A588 Ashton Road/Railway Street;
- M6 Junction 33/A6 Preston Lancaster Road;
- M6 Junction 33 On-slips;
- M6 Junction 33 Off-slips.

The TA scoping notes that there are a limited number of sites of a comparable complexity to this development, other than the Last Drop Village outside Bolton. As a consequence, development trips have been calculated based upon trip rates from the Last Drop Village. It is acknowledged that some of the land use of the Last Drop Village is similar to that of this proposed development. **However, the location of this development just off the M6 may result in through trips diverting from their route in order to use the marketplace/retail facilities, whereas the Last Drop Village is not located near to a motorway and therefore is unlikely to have the same level of diverted demand.** At this point, it should be noted that the marketplace / retail facilities portion of the development off M6 Junction 33 itself would not be recognised or signed as a motorway service area facility by Highways England. In the absence of sites with a similar geography and land use, it is suggested that individual trip rates for the different land uses are considered separately and that the trip rates are agreed with Highways England prior to development of the TA.

It is noted that a gravity model will be used, to distribute development trips, which is considered to be an acceptable methodology. It is also recommended that local distribution diagrams are included as part of the TA to understand the level of trips expected to use the M6 junction 33.

As part of the TA the scope mentions that the proposed site access junctions and those junctions covered in the WYG study along the A6 corridor will be tested for the base and the base with development scenarios. Standard appraisal models will be used at junctions where it is found that there will be a significant change in traffic flows. **Although this is considered a reasonable methodology it is recommended that a definition is provided for what the applicant considers to be a significant change in traffic flows.**

It is also mentioned that analysis of the operation of the M6 Junction 33 roundabout will be presented taking account of the modified layout to serve the development and slip road operation will be covered as part of this. It is agreed that this should be assessed in the TA. As mentioned in the scoping note from 30<sup>th</sup> January, **merge and diverge assessments should be undertaken for the junction 33 slip roads of the M6. These assessments should be**

**undertaken in line with DMRB TD22/06 (now CD122) guidance.** In the scoping note from 30<sup>th</sup> January it is also mentioned that a motorway link capacity assessment will be undertaken, which is welcomed.

It is noted that the scoping sets out six elements to be covered in the TA, which appear reasonable. Highways England would expect the TA document to cover the following chapters:

- Background and Context – setting the scene within which the TA has been developed;
- Existing Conditions – describing the site within the context of the local and wider highway network (e.g. SRN), including details on local road safety conditions;
- Planning Policy Context – set out the local, regional and national planning policy context as it relates to transport and access for the site;
- Sustainable Access Appraisal – describing the accessibility of the site to sustainable public transport networks, pedestrian connectivity and cycle connectivity;
- Development Proposal – describe the development proposal, its layout and access by all modes;
- Trip Generation, Distribution and Assignment – detailing the trip generation estimates produced, and how they have been distributed and assigned to the agreed impact area;
- Baseline and Forecast Year Traffic Flows, With and Without Development – based on the agreed assessment years and the estimated trip generation from the site opening year, how future flows in the impact area have been identified for the baseline situation and the with development situation. These traffic flows will form the basis of the highway impact assessment;
- Highway Impact Assessment – an analysis of the impact of the proposed development traffic on the agreed impact area and if appropriate include suitable mitigation measures developed to counter any adverse impacts. The impact assessment should also examine the performance of the site access; and
- Summary and Conclusions –summarising the key findings and the conclusions.

### **Conclusion**

Following our consideration of the EIA Scoping, which has focussed on the transport chapter of the ES and the scoping for the TA and FTP, we are of the view that it is broadly compliant with applicable guidance and best practice. In principle, we agree using the 2023 and 2033 Do Something traffic flows as the base for the assessment is appropriate, although it should be noted that we do not consider the LPTA to be a robust evidence base. We would also request that the ES identifies all construction routes likely to be employed during the construction phase and provides forecasts of the volume of traffic likely to be generated.

An appropriate transport assessment of planned growth is key to assessing the quality and capacity of transport infrastructure and its ability to meet forecast demand, leading to the identification of short, medium and long-term proposals and/or mitigation measures for all modes. We specifically request that a site-specific assessment is carried out for this site given its close proximity to the SRN and that it is likely to generate over 30 two-way trips, to assist Highways England in forming a full understanding of the implications of planned growth and this

development, particularly on Junction 33 of the M6. In addition, we recommend that as the HIF bid is still awaiting decision the applicant considers including a sensitivity test within the TA to understand the potential impact of the reconfiguration of Junction 33 of the M6, given that this is expected to be in place by 2023 as part of the bid criteria.

We note that the applicant intends to submit a planning application for this site, as such, Highways England has outlined details regarding what we would expect to be agreed in advance of any transport assessment carried out in support of the proposed development of this site.

If you would like to discuss anything about this letter, please contact me.

Yours faithfully,

A handwritten signature in black ink that reads "Warren Hilton". The signature is written in a cursive, slightly slanted style.

Warren Hilton  
Network Development and Planning Team  
Email: [warren.hilton@highwaysengland.co.uk](mailto:warren.hilton@highwaysengland.co.uk)

Mark Cassidy  
Lancaster City Council  
PO Box 4, Town Hall  
Dalton Square  
LANCASTER  
LA1 1QR

Phone: (01772) 531378

Email: [archaeology@lancashire.gov.uk](mailto:archaeology@lancashire.gov.uk)

Your ref: 1/2020/00064/EIO

Our ref: ASM/JMH/PMcC

Date: 3<sup>rd</sup> February, 2020

Dear Mr Cassidy

**Planning Application 1/2020/00064/EIO: Scoping opinion for the creation of a holiday village/leisure destination comprising:c. 400 lodges, 100 Stay Pods, Marketplace, retail sales area, up to 25 artisan pods, a 100 no. bed hotel with 150 seat function suite etc. a Virtual Reality Experience building and associated car parking and land re-modelling. Home Farm, Ellel Grange, Main Road, Galgate LA2 0HN**

Thank you for your consultation on the above application. The accompanying Environmental Impact Assessment Scoping Opinion Request (Stride Treglown, January 2020) includes a section on Cultural Heritage which indicates a Desk Based Assessment has been undertaken with a site visit. The DBA concludes that the features present on site are not of any greater significance than "Low" although the Home Farm has the potential to be on the site of a medieval monastic grange (a farm owned by a monastery but run by lay brothers). The Scoping Opinion Request also states that "*mitigation of potential impacts will be embedded within the design process.*"

The site was subject to a rapid assessment by LAAS (our predecessor body as archaeological advisors to Lancaster City Council) on a previous application for a site which is more or less identical to the site covered by this application. LAAS made the following comments which are also applicable to this application:

**Land at Home Farm, Ellel.**

This site comprises a large area of farmland with some woodland blocks, south of the canal branch to Glasson Dock and north of Ellel Grange, and including land both east and west of the Lancaster Canal. The area is crossed by the 'traditional' line of a main north-south Roman road, although recent research has suggested that an alternative line some distance to the west may have been followed. The Grange was a former medieval centre (but not the 'manor house') belonging to the monks of Cockersand Abbey, and was named in 1329 and 1340. After the Dissolution the estate was held by the Holt family but by the 17th century was the property of the Preston family, then considered the 'principal residents' of the parish. The OS 1848 1:10,560 mapping shows a building labelled 'Ellel Grange' to have been sited close to the present Home Farm and a significant portion of the development area is shaded as its associated 'demesne' land.

This building was demolished in 1857, when the present Grange was built for William Preston. The development site (and 'demesne') is crossed by the route of the North West Ethylene Pipeline and field-walking in advance of pipeline construction identified a cluster of medieval and post medieval earthworks within the site, perhaps preserved by the use of the land here as a park to the hall.

Lying just outside the south side of the development area, the former Church of St Mary is Listed Gd. II\*, with the adjacent Preston family mausoleum being Gd II. The 1857 Grange building and an associated service block, again just outside the development area, are also Listed Gd. II. The northern boundary of the area is formed by the Glasson branch of the Lancaster canal and incorporates a series of locks and bridges, which are Listed at Gd II. The main line of the canal runs through the development site and includes Double Bridge and Ellet Grange Bridge, also Gd. II. The canal lines themselves are not Listed but are of more than local significance and will need to be considered carefully during the design of any development proposals.

The site is considered to be of regional significance overall.

We would therefore advise that the proposed EIA for the proposed development of the holiday and leisure destination should include a full assessment of the impact on the existing known features and the potential for there being further unknown archaeological features in the area covered by the application – one possible line for the Roman road between the River Ribble crossing at Preston and the fort at Lancaster crosses the western part of the site, and this needs to be assessed and tested, ultimately by field evaluation for example.

Experience has indicated that large sites in the County frequently have previously unknown sites below the permanent and long ley grass which is the basis of the farming economy of much of Lancashire and so the study should include a description of the heritage potential on and around the site and set out a scheme of field investigation to be undertaken prior to any development commencing on the site. Topographical survey, geophysical survey, shovel pitting, trial trenching or other works may be included in such a scheme. A further scheme of archaeological mitigation may be required before or during the construction phase, but its scope will depend upon the results of this initial field investigation and it cannot yet be defined.

It is hoped that the above is self-explanatory, but should you have any questions or need further information please do not hesitate to contact us.

Yours sincerely

*Peter McCrone*

Planning Officer (Archaeology)

Date: 01 April 2020  
Our ref: 312204  
Your ref: 20/00064/EIO



Mr Mark Potts  
Lancaster City Council  
**BY EMAIL ONLY**

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Mr Potts

**Environmental Impact Assessment Scoping consultation (Regulation 17 (3) (i) of the EIA Regulations 2017):** EIO Scoping request for the creation of a holiday village/leisure destination comprising of; circa 400 Lodges (total area 28,000 m<sup>2</sup>), 100 Stay Pods (total area 2000 m<sup>2</sup>), a Marketplace (circa 1500m<sup>2</sup> retail sales area, 1400m<sup>2</sup> F&B, 500m<sup>2</sup> servicing/storage, 100 m<sup>2</sup> Ancillary facilities) up to 25 artisan pods (1,000sqm of new employment space), a Hotel (100 bedrooms, 150 seat function space and associated break out suite, reception and ancillary spaces, totalling 3,700 m<sup>2</sup>), a Virtual Reality Experience building (circa 750m<sup>2</sup>) and associated car parking and land re-modelling

**Location:** Home Farm, Ellel Grange, Main Road, Galgate, Lancaster, Lancashire LA2 0HN

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation which we received on 17 March 2020.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Case law<sup>1</sup> and guidance<sup>2</sup> has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission.

### **Recreational pressure**

The development site is within 2.5 km of the Lune Estuary Sites of Special Scientific Interest (SSSI), Morecambe Bay and Duddon Estuary Special Protection Area (SPA) and Morecambe Bay Special Areas of Conservation (SAC) and Ramsar site, and as such has the potential for increased recreational pressure on the designated site. Consideration should be given to increasing home owners awareness of potential effects resulting in an increase in trampling, visual and noise disturbance and displacement effects on the designated site and other recreational opportunities in the area.

### **Functionally Linked Land**

Special Protection Areas are classified for rare and vulnerable birds, and for regularly occurring migratory species. The birds for which SPAs are designated may also rely on areas outside of the SPA boundary. These supporting habitats may be used by SPA populations or some individuals of the population for some or all of the time. These supporting habitats can play an essential role in

---

<sup>1</sup> Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)

<sup>2</sup> *Note on Environmental Impact Assessment Directive for Local Planning Authorities* Office of the Deputy Prime Minister (April 2004) available from

<http://webarchive.nationalarchives.gov.uk/http://www.communities.gov.uk/planningandbuilding/planning/sustainability/environmental/environmentalimpactassessment/noteenvironmental/>

maintaining SPA bird populations, and proposals affecting them may therefore have the potential to affect the SPA.

It should be noted that some of the potential impacts that may arise from the proposal relate to the presence of SPA interest features that are located outside the site boundary. It is advised that the potential for offsite impacts needs to be considered in assessing what, if any, potential impacts the proposal may have on European sites.

### **Hydrology**

There is a potential for runoff and drainage to impact on the designated site. Consideration should be given to this in the ES.

### **Soil and Agricultural Land Quality**

Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 112 of the NPPF. We also recommend that soils should be considered under a more general heading of sustainable use of land and the ecosystem services they provide as a natural resource in line with paragraph 109 of the NPPF.

Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society, for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably.

The applicant should consider the following issues as part of the Environmental Statement:

1. The degree to which soils are going to be disturbed/harmed as part of this development and whether 'best and most versatile' agricultural land is involved.

This may require a detailed survey if one is not already available. For further information on the availability of existing agricultural land classification (ALC) information see [www.magic.gov.uk](http://www.magic.gov.uk). Natural England Technical Information Note 049 - [\*Agricultural Land Classification: protecting the best and most versatile agricultural land\*](#) also contains useful background information.

2. If required, an agricultural land classification and soil survey of the land should be undertaken. This should normally be at a detailed level, eg one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, ie 1.2 metres.
3. The Environmental Statement should provided details of how any adverse impacts on soils can be minimised. Further guidance is contained in the [\*Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites\*](#).

### **Other Advice**

Annex A to this letter provides Natural England's general advice on the scope of the Environmental Impact Assessment (EIA) for this development.

### **Natural England's pre-application Discretionary Advice Service (DAS)**

Natural England has identified that this proposal may be suitable from benefitting from our pre-application advice service due to the proximity to designated sites of nature conservation, potential for green infrastructure gains and/or the potential for biodiversity enhancements. Through early engagement with Natural England customers will receive high-level customer service to support an efficient planning application process and achieve development which is more sustainable.

The first step is for the applicant/consultant to fill out a simple '[Request Form](#)' and email it to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk) so we can register interest and assign a local Natural England consultant.

If there are European Protected Species on site, Natural England offers a separate Pre-submission Screening Service (PPS) for planning proposals that will require a mitigation licence. More about this service can be found [here](#).

*Please note that our pre-application advice is provided without prejudice to the consideration of any statutory consultation response or decision which may be made by Natural England in due course.*

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely  
Camilla Davidge  
Planning Adviser  
Cheshire, Greater Manchester, Merseyside & Lancashire Area Team

## **Annex A – Advice related to EIA Scoping Requirements**

### **1. General Principles**

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- A description of the whole development – including physical characteristics and the full land use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the construction and operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen, including a comparison of the environmental effects.
- A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, transboundary, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to avoid, prevent, reduce and where possible offset any significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements. This should include both the construction and operational phases.
- A description of the expected significant adverse effects of the development to the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters that are relevant to the project concerned. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

### **2. Biodiversity and Geology**

#### **2.1 Ecological Aspects of an Environmental Statement**

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EclA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EclA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to

support other forms of environmental assessment or appraisal.

The National Planning Policy Framework sets out guidance in S.118 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

## **2.2 Internationally and Nationally Designated Sites**

The ES should thoroughly assess the potential for the proposal to affect designated sites.

European sites (e.g. designated Special Areas of Conservation and Special Protection Areas) fall within the scope of the Conservation of Habitats and Species Regulations 2017. In addition paragraph 118 of the National Planning Policy Framework requires that potential Special Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.

Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

### **Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation, Special Protection Areas and Ramsar sites)**

Natural England has recently published a set of mapped Impact Risk Zones (IRZs). The IRZs are a GIS tool developed by Natural England to make a rapid initial assessment of the potential risks posed by development proposals to: Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. They define zones around each site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts.

This helpful GIS tool can be used by LPAs and developers to consider whether a proposed development is likely to affect a designated site. Further information and guidance on how to access and use the IRZs is available on the [Natural England website](#)

Information on SSSI's and their special interest features can be found at [www.magic.gov](http://www.magic.gov). The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within these sites and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.

Natura 2000 network site conservation objectives are available on our internet site <http://publications.naturalengland.org.uk/category/6490068894089216>

## **2.3 Regionally and Locally Important Sites**

The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trust, geoconservation group or local sites body in this area for further information.

## **2.4 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017**

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

In order to provide this information there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. Natural England has adopted [standing advice](#) for protected species which includes links to guidance on survey and mitigation.

## **2.5 Habitats and Species of Principal Importance**

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available here <https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity>.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (e.g. whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species;
- Full details of any mitigation or compensation that might be required.

The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site, and if possible provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

## **2.6 Contacts for Local Records**

Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local

wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

### **3. Designated Landscapes and Landscape Character**

#### **Nationally Designated Landscapes**

For development sites within/adjacent to nationally designated landscapes (National Park or Area of Outstanding Natural Beauty (AONB)) consideration should be given to the direct and indirect effects upon the designated landscape and in particular the effect upon its purpose for designation within the environmental impact assessment, as well as the content of any relevant management plan.

#### **Landscape and visual impacts**

Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography. The European Landscape Convention places a duty on Local Planning Authorities to consider the impacts of landscape when exercising their functions.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant [National Character Areas](#) which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

#### **Heritage Landscapes**

You should consider whether there is land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific or historic interest. An up-to-date list may be obtained at [www.hmrc.gov.uk/heritage/lbsearch.htm](http://www.hmrc.gov.uk/heritage/lbsearch.htm).

### **4. Access and Recreation**

Natural England encourages any proposal to incorporate measures to help encourage people to

access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

### **Rights of Way, Access land, Coastal access and National Trails**

The EIA should consider potential impacts on National Trails, access land, public open land, rights of way and coastal access routes in the vicinity of the development. The National Trails website [www.nationaltrail.co.uk](http://www.nationaltrail.co.uk) provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

### **5. Air Quality**

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition ([England Biodiversity Strategy](#), Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System ([www.apis.ac.uk](http://www.apis.ac.uk)). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

### **6. Climate Change Adaptation**

The [England Biodiversity Strategy](#) published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' ([NPPF](#) Para 109), which should be demonstrated through the ES.

### **7. Ancient Woodland – addition to the S41 NERC Act paragraph**

The S41 list includes six priority woodland habitats, which will often be ancient woodland, with all ancient semi-natural woodland in the South East falling into one or more of the six types.

Information about ancient woodland can be found in Natural England's standing advice [http://www.naturalengland.org.uk/Images/standing-advice-ancient-woodland\\_tcm6-32633.pdf](http://www.naturalengland.org.uk/Images/standing-advice-ancient-woodland_tcm6-32633.pdf).

Ancient woodland is an irreplaceable resource of great importance for its wildlife, its history and the contribution it makes to our diverse landscapes. Local authorities have a vital role in ensuring its conservation, in particular through the planning system. The ES should have regard to the requirements under the NPPF (Para. 118)<sup>2</sup> which states:

'Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.'

### **8. Cumulative and in-combination effects**

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are

likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.