

STRIDE TREGLOWN



Environmental Statement: Chapter 4 – Consideration of Alternatives

Ellel Holiday Village, Lancaster

Ellel

Ellel Holiday Village LLP

4. Alternative Development Options

- 4.1.1 Parts 1 and 2 of Schedule 4 of the EIA Regulations require an applicant to provide an outline of the main alternatives considered and an indication of the main reasons for the choices made, taking into account the environmental effects. This chapter therefore, reviews the principle land use and siting options explored and the reasoning for the selection of the current design for the development which forms the subject of assessment within the ES.
- 4.1.2 Design options have been studied and developed to explore how best to respond to the site and its context, to provide the most appropriate design whilst fulfilling the development brief. The Applicant has also undertaken an analysis of other potential sites in order to determine the most suitable Site location for the proposed development. A standalone Sequential Test is submitted in support of the outline application which identifies a number of alternative sites within the local catchment area as agreed with Lancaster City Council during pre-application discussions.
- 4.1.3 In their adopted Scoping Opinion Lancaster City Council provided guidance on how the subject of alternative forms of development of use should be dealt with as part of the EIA process.
- 4.1.4 Specifically, it was noted that the evaluation should consider:
- Options for alternative uses of the site;
 - Options for alternative patterns and forms; and,
 - Alternative sites for the proposed development.
- 4.1.5 In providing guidance on the approach to take to this matter, the Council indicated that consideration should be concise and limited to an outline of principle alternatives and the reasons for selecting the preferred option.

4.2. Alternative Uses of the Site

- 4.2.1 As set out in the previous Chapter, the site is currently actively farmed. The retention of the existing use is clearly an alternative option for the site. However, such an approach would not allow for the desired project outputs, namely to provide land suitable for a mixed use attraction for tourists.
- 4.2.2 The next most realistic option for an alternative use would be to consider development on a smaller portion of land, with the remainder being retained in active agricultural use. However, due to the current use there is a significant level of infrastructure required in order to unlock the site for delivery at any level, principally focused on providing appropriate highway access but also in respect of essential services, including gas, electricity, foul drainage connection and communication networks. On this basis, a reduced level of development on the site would mean that development costs are disproportionately larger due to costs having to be spread across a smaller developable area/quantum of development.
- 4.2.3 The proposals are for a mixed use tourism attraction. Alternative development options might include residential, employment or solely retail uses. Each is considered in brief below.

Residential

- 4.2.4 This is not considered to be an appropriate use of the site. The applicant sought pre-application advice in September 2018 in relation to the development of the site for up to 695 dwellings. On receipt of pre-application advice in November 2018, it was clear that Development Management officers were reluctant to support proposals for a predominantly residential lead scheme due to general sustainability issues as well as concerns relating to scale, location and phasing of new development.

- 4.2.5 Upon receipt of pre-application advice, the site was promoted through the local plan process as an additional or contingency strategic site in the event housing delivery did not happen at expected rates. An allocation for residential development at the site was not forthcoming with the Inspector commenting at Paragraph 71 of his report that;

“Reasonable alternatives have been assessed through the SHELAA and SA. Sites have been allocated in terms of their availability, suitability and achievability, in accordance with the settlement hierarchy, taking account of the constraints that exist within the District. This has minimised the need to allocate land that is heavily constrained or that would have an adverse impact on landscape character, green infrastructure, highways and sustainable transport and flood risk”.

- 4.2.6 If this development site were delivered solely for housing there would be inevitable questions as to whether the site can be considered to be sustainable and consistent with the spatial strategy.

Solely Employment

- 4.2.7 As with a development which only provides housing, one which provided employment space only would arguably be equally unsustainable. Policy DM14 of the Lancaster Development Management DPD relates to proposals involving employment land and prioritises their development on allocated employment sites. Where this is not practical or achievable, locating them within or connected to main urban areas or sustainable settlements is preferred.
- 4.2.8 Given the site remains unallocated for employment uses and lies outside of the main urban areas or sustainable settlements, a solely employment led proposal for the site was discounted.

Solely Retail

- 4.2.9 The final alternative form of development, which might be considered for the site, is solely retail. However, this has not been given any significant consideration on the basis that a solely retail based scheme would likely fail a sequential approach to delivery of retail uses. Chapter 7 of the NPPF seeks to ensure the vitality of town centres and confirms that only where sites are not available for such uses should edge-of-centre sites be considered and then other accessible locations that are well connected to the town centre.

4.3. Alternative Patterns/Forms of Development

- 4.3.1 As noted in Section 2.4 above, initial design work focussed on the creation of a 21st Century settlement, designed using updated Garden Village principles. It was intended to create a place that felt like it had developed organically over time. Relatively dense early development would take place along the lanes followed up by individual parcels of land to be developed ‘field by field’. The philosophy that underpinned the original design approach is still in evidence in the current proposal which seeks to utilise the unique character of each part of the site to create a series of places which feel like they should belong.
- 4.3.2 Investment in local enterprise which formed the heart of the early residential concept remains a key aspect of the holiday village.
- 4.3.3 The initial approach was focused on ecology, landscape and visual impacts and highway access/impacts, these being the three areas considered critical to establishing whether the site has potential in the first instance to be considered for development. In effect this represented a fresh approach to considering the opportunities and constraints relating to the site.
- 4.3.4 The diagram below indicates the key aspects of each of the studies overlaid to form a constraints plan. This plan represented the starting position for developing the current proposals which was informed by a detailed understanding of the site.



Figure 4-1: Initial Constraints Plan

- 4.3.5 The proposed holiday village mirrors the layout and identity inherent in the original residential proposal. The site lends itself well to its intended use as a holiday village and the early sketch layouts demonstrated that such proposals could be created at a scale that would enable it to function as a self contained holiday destination.
- 4.3.6 Changes to the early layout of the proposed village have emerged in response to officer and member consultation and in line with the overlapping influences of the baseline survey work carried out, including;
- Biodiversity Net Gain
 - Landscape enhancements
 - Drainage strategy
 - Conservation and heritage
 - Design for manufacture – off-site lodge construction
- 4.3.7 All of these factors have had a major bearing on the parameters plans which accompany the submission, however it is the marketplace element of the proposed development that has developed and altered the most alongside detailed access arrangements with a spur off the Hampson Green roundabout, thus providing safe and convenient access to Junction 33 of the M6. The underlying intent to create a regionally important leisure destination has remained key to the emerging layout of the proposed development, as has the desire to utilise the site’s proximity to J33 of the M6 in order to maximise the scheme’s attraction to a large potential customer base that passes the site to Lancaster.

- 4.3.8 As set out within the submitted Design and Access Statement prepared by Stride Treglown, the initial concept was to replace the ridge of the drumlin with a large green roof under which the marketplace would be accommodated and effectively screened from nearby visual receptors. However site investigation work revealed that bedrock was located too close to the surface thereby removing the green roof as a viable option. Several further iterations were explored which located the hotel adjacent to and then above a green-roofed marketplace.
- 4.3.9 The finalised concept as set out within the Design and Access Statement sees a return to first principles using the slope on the canal side of the drumlin to create an exciting and dynamically undulating form which will feel part of the natural topography.
- 4.3.10 On the basis of the above and specifically the design evolution that has taken place both since the original residential proposals for the site and during the pre-application process (in response to technical baseline/assessment work), it is considered that due consideration has been given to the potential for alternative forms/patterns of development.

4.4. Alternative Sites for the Proposed Development

- 4.4.1 Pre-application discussions with Lancaster City Council confirmed the requirement for a sequential analysis of available and suitable sites to be submitted in support of the outline planning application. The submitted Sequential Test and Retail Impact Assessment considers alternative sites within the wider catchment area as agreed with LCC officers in pre-application discussions. Potential sites within Lancaster, Morecambe, Carnforth and Garstang were identified for consideration.
- 4.4.2 The consideration of alternative sites for development is inevitably skewed by matters relating to land ownership and availability, in large part driven by matters of assembly (where there are multiple landowners) and willingness/interest in developing. Furthermore, an assessment of alternative sites is limited to sites that are capable of accommodating the whole of the development proposed by the application, allowing for some degree of flexibility in scale and format.
- 4.4.3 The application site extends to 58.9 ha. The scheme has been designed deliberately to be low density to minimise the impact upon the countryside, to reduce the carbon impact of the development and to help create a high quality, attractive holiday and visitor destination. While the development could be housed on a smaller site, too significant a reduction would ultimately lead to a fundamental adjustment to the proposed development that would not meet the same purpose as that proposed by the submitted application.
- 4.4.4 With this in mind, the following alternative sites were considered and subsequently discounted. More detail is offered in relation to each site within the Sequential Test which accompanies the outline planning application.

Lancaster City Centre

Site 1 – Canal Quarter

- 4.4.5 Having regard to the submitted Sequential Test, it is concluded that the Canal Quarter site does not represent a comprehensive redevelopment site and is more suited to smaller, phased development on individual plots. Notwithstanding this, the site is simply too small to accommodate the proposed development, even allowing for a reasonable degree of flexibility. The site is in multiple ownerships and large parts of the Canal Quarter are still in active use. As such, the site is not available for development.

Site 2 – Former BHS Unit

- 4.4.6 The former BHS unit is significantly below the minimum area required to accommodate the proposed development as a whole after allowing for a reasonable degree of flexibility. Indeed. The former BHS unit is not sufficiently large to accommodate even the town centre uses proposed by the submitted planning application. Having regard to the Sequential Test, it is concluded that the former BHS unit is neither suitable nor available for the proposed development and can therefore be dismissed from the assessment.

Lancaster Edge and Out of Centre Sites

Site 3 – Luneside East, Lancaster

- 4.4.7 Luneside East extends approximately 7 hectares and is located on the southern banks of the River Lune in Lancaster City Centre. The site is previously developed and is located in an accessible location close to Lancaster City Centre. The site has a history of industrial uses, which was part of the employment and manufacturing quarter in Lancaster.
- 4.4.8 The site benefits from two planning permissions. The first for the erection of 449 dwellings was approved by Lancaster City Council and it is understood that Persimmon Homes are currently constructing the units, which are for sale on the company's website. A further planning permission for the demolition of an existing mill building and the erection of three buildings including town centre uses as well as student accommodation is also currently under construction
- 4.4.9 At approximately 7 hectares, the Luneside East site is significantly below the minimum area required to accommodate the proposed development as a whole after allowing for a reasonable degree of flexibility.
- 4.4.10 Furthermore, the policy status of the site as a mixed-use, residential led redevelopment, would mean that the proposed development would not be consistent with the existing and emerging planning policy for the site and potentially impact on housing delivery.
- 4.4.11 Having regard to the assessment set out in the Sequential Test, it is concluded that the Luneside East site is neither suitable nor available for the proposed development and can therefore be dismissed from the assessment.

Site 4 – Lune Industrial Estate, Lancaster

- 4.4.12 Although the Lune Industrial Estate site is allocated as a development opportunity in the Lancaster Local Plan, it is currently in active use by a range of employment uses. As such, is not considered to be available for development at this time.
- 4.4.13 Having regard to the assessment set out in the submitted Sequential Test, it is considered that the Lune Industrial Estate site is not available for redevelopment as it is currently in active use for employment uses. Furthermore, the site is not suitable as it is too small to accommodate the proposed development.

Morecambe

Site 5 – Former Frontierland Site

- 4.4.14 The site is allocated in the Morecambe Area Action Plan DPD as a development opportunity site. Policy DO6 of the Area Action Plan identifies the site as a significant opportunity for predominantly housing development. Following the publication of the Action Plan in 2013 planning permission was granted for retail development on the site. However, the retail development has not been implemented, the permission has now expired and the site remains vacant.

- 4.4.15 Having regard to the assessment set out in the Sequential Test, it is concluded that the Former Frontierland site is neither suitable nor available for the proposed development and can therefore be dismissed from the assessment.

Carnforth

Site 6 – Former TDG Depot

- 4.4.16 Although the site is allocated as a development opportunity site in the Lancaster Local Plan, it is currently occupied by a number of uses including DPD delivery services, Scott Wilson Body Shop, Colin Briscoe Construction and WCF fuels. Accordingly, it is considered that the site is not available for development at this time.
- 4.4.17 At 6.35 hectares, the former TDG development site is significantly below the area required to accommodate the proposed development. With this in mind, it is concluded that the former TDG Site is neither suitable nor available for the proposed development.

Garstang

Site 7 – Land West of Cockerham Road, Garstang

- 4.4.18 The land west of Cockerham Road in Gasrtang extends approximately 14.5 hectares and is located to the west of Garstang town centre on the edge of the built-up area. In February 2020 Taylor Wimpy submitted a planning application on part of the site for the erection of 88 dwellings and associated infrastructure.
- 4.4.19 While the site is yet to be developed, the planning application submitted by Taylor Wimpy indicates that at least a part of the site is no longer available for development. Accordingly, it is considered that only part of the site is currently available for development.

Site 8 – Land West of A6, Garstang

- 4.4.20 The site is allocated for mixed-use housing and employment development in the adopted Wyre Local Plan. Policy SA-3 / 5 indicates that the site has been allocated for 270 dwellings and 4.68 hectares of employment land.
- 4.4.21 The site has outline planning permission for housing and employment uses reference. 14/00458. In April 2020, an application for reserved matters approval for the residential development of 222 dwellings and development of the 4.68 hectares of employment land, along with a convenience store and coffee shop was submitted to Wyre council (ref: 20/00340/RELMAJ).
- 4.4.22 The planning history of the site, including the recently submitted application for reserved matters approval, indicates that the site is not available for development.

4.5. Overview

- 4.5.1 This Chapter has considered alternative options in relation to development of the site, in terms of uses, layout or other spatial locations for development.
- 4.5.2 It is clear from the above analysis, together with the work presented in the wider ES and the planning application (principally the Planning, Design and Access Statement which explicitly addresses design evolution), that due consideration has been given to how best to approach the site in terms of mitigating impacts and then accommodating development.
- 4.5.3 The conclusion of this is that the site is considered to be appropriate in the context of alternatives.