



## LOCAL PLAN CONSULTATION RESPONSE

**This report explains the reasons why elements of the Local Plan are unsound and why Bailrigg garden village (BGV) (SG1) needs reconsidering**

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## I Introductory Statement

1. CLOUD members fully support the concept of sound, evidence-based local plans. We recognise the importance of such plans for the future development and prosperity of local communities, in terms of employment, housing, infrastructure, schools, hospitals and other social and community facilities. We also welcome the opportunity which the local planning process offers for local citizens to be consulted on and involved in the production of such plans.

2. However, we believe that crucial elements of the Lancaster local plan are neither sound nor evidence-based. These are set out in our detailed responses. In summary our reservations centre on 2 elements of the local plan. First we do not believe that the plan makes a convincing case for the overall assessment of housing need. We consider this to be overstated and consequently do not accept that a case has been made for the proposed level of house-building, nor for the development of Bailrigg garden village (BGV). With 3500 houses, this is fundamentally different in size from typical small-scale housing developments in Lancaster and yet much of the detail about it is absent from the current local plan and won't be made available until 2020.

3. Our second reservation is that evidence to support the plan is lacking in important respects such as infrastructure costs, air pollution and transport. Much of the plan is just aspirational. While its aims are laudable, the lack of specific detail has made it difficult for local citizens to respond. We recognise that it is impractical to produce a fully detailed plan extending out into the 2030 decade, but central government guidelines make clear that realistic costings should be produced for at least the first 5 years.

4. Members and supporters of CLOUD are not opposed to all and any development in Lancaster - just to unnecessary ones such as BGV. We welcome developments which are sustainable and meet the actual needs of the local community. We also welcome the opportunity to raise our concerns with the Planning Inspector. We have received little by way of response from Lancaster City Council to our concerns and objections despite presenting a petition to a meeting of the city council, raising issues at drop-in sessions and submitting objections to the draft version of local plan.

## II About CLOUD

The CLOUD organisation was established on 19th October 2017, when we held our inaugural annual general meeting, agreed our constitution and elected a management committee. Previously, local residents had come together to challenge the consultation version of the local plan and had raised a petition, with some 400 signatures, which was submitted to Lancaster city council in March 2017. In accordance with council procedures, CLOUD was able to give a 5 minute presentation on our reasons for opposing BGV to the city council meeting on 20 December 2017.

CLOUD stands for **C**itizens of **L**ancaster **O**pposed to **U**nnecessary **D**evelopment.

Our aim, as set out in our constitution is:

*The aim of CLOUD shall be to: stop the proposed development of BGV and, where we judge it is appropriate, to help other local action groups objecting to other unnecessary developments, as set out in the current Lancaster city council Local Plan.*

CLOUD currently has some 90 members who vote at General meetings to determine CLOUD policy; a further 100 supporters receive Newsbriefs and can attend meetings. They are all largely drawn from South Lancaster. Membership has grown steadily since our first meeting and continues to rise. We - the Management Committee - communicate regularly with our members and supporters by email Newsbriefs and social media and by flyers distributed house to house. We held our 2nd general meeting on 20th March to determine how CLOUD should respond to the publication version of the local plan. That meeting endorsed the response set out in this document.

### III KEY ISSUES

(References are to the Strategic Policies & Land Allocations DPD unless otherwise stated)

Subject	Key issues	Local Plan reference	Soundness issues raised
Jobs and the Lancaster economy. (see section IV part 1 below)	Lack of evidence-based quantification for the 9,500 projected jobs. Lack of evidence on where those living in BGV would work. Lack of evidence from Lancaster University on expected jobs growth from the Health Innovation Centre and future student and staff numbers. Impact of Council's revised plans (March 2018) for the Canal Corridor.	Ch 8 & Ch 12 (para 12.27 for Health Innovation Centre)	Not positively prepared.  Not justified
Lancaster's housing needs. (see section IV part 2 below)	Excessive house-building in relation to forecast job growth. This encourages commuting and so runs against national planning policy of reducing greenhouse emissions. Lack of evidence to support high house-building target - despite clear evidence that houses in Lancaster are already more affordable than in most other cities. High infrastructure costs of BGV will constrain ability to achieve affordable housing targets.	Ch 8 Ch 9 ( para 9.19 for house building target)	Not justified. Not consistent with national policy. Not effective
Flooding - existing issues and impact of BGV. (see section IV part 3a below)	Local plan recognises flooding as a current and major issue but fails to identify specific measures to address its causes. The locations of rivers and becks are crucial in this respect, yet there is no map to show which ones were responsible for the 22 Nov 2017 flooding across Lancaster. The proposed development of BGV and the associated link road to M6 Junction 33, together with development of Lancaster University's Health Innovation Campus (just started), all add to the flooding risk for south Lancaster and Galgate in particular. The Local Plan lacks specific measures to address these risks.	Ch 10 (para 10.11). Para 12.26-32 re Health Innovation Campus	Not effective.  Not justified  Not consistent with national policy
Road Infrastructure (see section IV part 3b below)	Lack of comprehensive cost estimates for BGV infrastructure. Sources of funding for infrastructure development not identified.. High cost per house Reason why residents have no up to date information	Ch 12 - para 12.33 Infrastructure. 12.36-37 Details of infrastructure	Not effective.   Not justified
Traffic and Transportation (see section IV part 3c below)	Lack of detailed modelling on the impact of BGV residents on road use. Questions not asked included : Percentage of adult population travelling to work daily Where they would work How they would travel The same questions were also asked about journeys to and from school		Not effective.  Not justified Not positively prepared
Air Quality (see section IV part 3d below)	Lancaster has an existing and serious poor air quality problem. The Local plan lacks specific measures to address this. The proposed relocation of Junction 33 (as part of the BGV scheme) would provide only localised amelioration. It would not address air quality issues along the A6 corridor through south Lancaster or at the Pointer roundabout or in Lancaster city centre. Ecological habitats damaged.		Not effective. Not positively prepared. Not consistent with national policy
Education and health services (see section IV part 3e below)	Growing ageing population yet no plans to expand hospital or ambulance service. Not clear what will be accessible for those without car.  Primary and secondary schools within BGV, but lack of information on how these are to be funded.	Para 12.41 (Schools within BGV). Part 2 DM DPD paras 5.69 and 70. Infrastructure Dev Plan IDP A.6, A.10, A12.	Not consistent with national policy.  Not effective.  Not justified
Garden village boundaries. (see section IV part 3f below)	Successive iterations of the maps associated with the local plan have shown extensions to the boundaries of BGV. No justification for these changes has been provided. The original area of separation between BGV and Galgate has been eliminated.	Principle of separation Part 1 SPLA DPD; Policy EN8; 22.44.	Not effective Not consistent with national policy

## **IV Detailed Responses to the Local Plan**

1 Jobs and the Lancaster economy

2 Lancaster's housing needs

3 Bailrigg Garden Village:

a Flooding

b Road infrastructure

c Traffic and transportation

d Air quality

e Education and health services

f Garden village boundaries

### **1 Jobs and the Lancaster economy**

We would like the Inspector to be aware that we fully support the Local Planning Authority's view that economic growth is a policy priority to be addressed within the plan period.

However, in general the policies are at very high level and, apart from a number of jobs estimated at 9500 arising from the Employment Land Review (now out of date as it was carried out in 2015 and has been overtaken by recent events), it is vague on quantifying the impact of its policies. Furthermore, it does nothing to evaluate the threats in the SWOT analysis (such as the departure from the EU) in terms of potential job losses, and moreover it completely ignores the impact of job losses from the switch from high street to on-line retailing. The closure of BHS in Lancaster Town Centre is a case in point.

The impact of the Local Plan on the economy and job location is too important not to provide an evidence-based quantification of job opportunities. Moreover, such an evidence-based quantification should identify the nature of those opportunities in specific sites of opportunity. Such issues affect other policy areas, such as Flood Amelioration, Transport and Communication, and Infrastructure, and should be a main driver of the land allocation in the plan and in the location of housing. We have noted elsewhere (in our comments on Transport and Communication) that the Authority has not been able to respond to our query as to where it considers the residents of the BGV would work and the consequent impact of that on journeys to and from work created.

In Chapter 12 paragraph 27 it is asserted that the Lancaster University Health Innovation Campus (HIC) has the potential to deliver in the region of 2,000 new jobs, but the Plan does not indicate the time period over which this will arise or provide any objective evidence to support the number. Page 19 of the October 2017 Public Reports pack to the Council's Cabinet refers to potentially 3,000 new jobs and 4,000 new students at the University over the next decade. It is clear therefore, that the Authority is placing a great deal of reliance on the University as an engine for growth, but the Plan provides no objective evidence to

support this expansion. Accordingly, the Inspector may feel that the University should be asked to give evidence as to (a) the details of phasing and expected HIC employment growth and (b) its own plans for expansion, especially following BREXIT. Because of the proximity of potential jobs at the University and the HIC the actual number of jobs provided may impact on the transport demand from the BGV (BGV); however, the scale of the impact entirely depends on the degree to which such new jobs are filled by relocation of employment to BGV. There is an increasing trend for medical and health related business to engage through the digital economy for the supply of services and products, and exchange of information for innovation. Such businesses would not need to bear the cost of relocation, or if they did, may only do so for a small proportion of their staff.

We referred earlier to the fact that the Employment Land Review is out of date. This is because the plans for developing the Lancaster Canal Corridor are now to be restructured in a way which will reduce retail provision, change employment opportunities and increase residential provision.

Accordingly, we feel that the plans for employment and economic growth are not based on an objective evidence base, or on quantified site by site opportunities so that they interact meaningfully with other policy areas in the plan. The Authority should be asked to provide far greater granularity and market-based evidence, including that from major employers such as the University, and provide specific linkage between the SWOT analysis and the policies it proposes to adopt to mitigate threats, overcome weaknesses, realise opportunities and capitalise on strengths.

## 2 Lancaster's housing needs

The Local Plan places an excessive emphasis on the provision of new housing, particularly in relation to the number of new jobs which it expects to be created. The plan proposes the construction of some 12,000 new houses by 2034, but only expects 9,500 new jobs. Assuming an average of just 1 job seeker per house, these new houses would require an extra 12,000 jobs, rising to 24,000 if there were 2 job seekers per house. Without sufficient jobs in the Lancaster locality, what is the point of building all these houses? Ch 9 para 9.19 (and Ch 8 para 8.13 for the jobs figures)

The mismatch between the number of new houses and new jobs, means that an increasing number of Lancaster residents would have to commute daily by car to places of work outside the district. This conflicts with the National Policy Planning Framework which obliges local authorities to “plan for new developments in ways which reduce greenhouse gas emissions.” (NPPF para 95 in chapter 10 ‘Meeting the challenge of climate change, flooding and coastal change’).

The need for more and better jobs in Lancaster is clear. For example a 2012 Lancaster City Council report (Lancaster District: Local Housing Needs and Demand Survey - Local Plan Consultation - Final Report Summer 2012) analysed the reasons people had for moving out of Lancaster. The results were tabulated in table 8-4 reproduced here:

Reason	% of households
Family reasons	30.7%
Employment/work	50.1%
Education	8.6%
Retirement	16.5%
Financial	12.6%
Lack of affordable rented housing	3.7%
Unable to buy locally	6.3%
Quality of neighbourhood	14.7%

(Note: This was a multiple choice question so the results add up to more than 100%)

What is very striking is that employment/work was by far the main reason for people moving, while housing issues scored extremely low. It is highly unlikely that the situation today is significantly different. This points to the need for the Local Plan to concentrate more on job creation (especially high quality ones), and on economic regeneration and less on house building if it is to be effective. The National Planning Policy Framework sets the target of achieving a “strong, responsive and competitive economy” (para 7) which won’t be met by building more houses in a location which is already one of the most affordable in the country.

The Local Plan records that 2070 houses were completed over the 5 year period to 2016/17, giving an average of 415 houses per year. Over a longer 10 year period to 2015/16, the average number of houses built per year was 250. (Lancaster City Council Housing Land Monitoring Report 2016 published 24.03.17). That this historic rate of house building has been sufficient to meet local housing need is confirmed by the fact that houses in Lancaster are now amongst the most affordable in the country. The Lancaster Guardian reported (08.02.2018) that the authoritative Lloyds Bank



Affordable Cities Review placed Lancaster as the 4th most affordable city in the whole of the UK - and the 2nd most affordable in England. Similar evidence is provided by the Office of National Statistics which calculates affordability ratios for all local authority areas in England and Wales. The ratios range from 3.14 (most affordable) to 30.68, with Lancaster scoring 5.36. Lancaster is one of just 97 authorities with a ratio below 6.00, the other 249 authorities being less affordable. (Source: ONS dataset ratio of house prices to residence based earnings table 5c - release date 17.03.17). The Local Plan however claims that Lancaster has a requirement for 522 dwellings per annum - well above actual completions in recent years. The question arises as to why this much higher figure is needed, given the clear evidence that houses in Lancaster are already more affordable than in most other localities. We contend that this needs to be resolved and explained to local residents before the Local Plan is taken forward.

The Local Plan sets targets for the delivery of new affordable housing, ranging from 30% to 40% of houses built. In the case of BGV, house builders will first be expected to contribute to its high infrastructure costs, so reducing their profitability. This in turn will make them less willing or able to provide affordable housing. Given that BGV is the single largest housing development in the Local Plan, this must call into question the Council's ability to meet its targets for affordable housing through building a large number of houses here. (Development Management DPD Policy, DM3).

### 3a BGV:

#### a) Flooding

1. A matter of considerable concern to residents and businesses in Lancaster District has been flooding, in recent years increasingly severe and increasingly frequent.

#### Location, Rivers, Becks and Floods

2. Lancaster lies to the west of the Pennines, down whose flanks flow two major rivers and several substantial becks. From north to south these are the River Lune (which exits into Morecambe Bay), Burrow Beck (which eventually flows into the Lune), Ou Beck (which west of the A6 is known as Shearset Beck and which having skirted housing in Galgate exits into the River Conder), the River Conder itself (which having passed through Galgate meanders down to the mouth of the Lune at Conder Green), and lastly Whitley Beck (which enters Galgate from the east and, as will be described below, joins the Conder in the middle of the village). It is a disconcerting fact, which the Planning Inspector will note, that the Local Plan contains no map indicating the locations of these rivers and becks and marking the existing flood-vulnerable areas, especially since acknowledged as a 'threat', p.31, is the 'resilience [meaning lack of] critical infrastructure in extreme events, such as at times of flooding'.

3. Records do exist to show that historically and with increasing frequency all these water courses have burst their banks and caused damage to lives, properties and businesses. It is even accepted in the Local Plan, para 10.11, that the district 'has suffered from extreme weather events and from flooding'. Environmental scientists at Lancaster University have also stressed that climate change is undoubtedly making the problem worse in this area. [For some relevant sources see

(i) Brian Davidson and Phil Leigh, 'Record rain events in Lancashire, August 2004', *Weather*, August 2005, vol.60, no.8, HYPERLINK "<http://onlinelibrary.wiley.com/doi/10.1256/wea.275.04/pdf>"

(ii) Environment Agency, *Lune Catchment Flood Management Plan, Summary Report*, December 2009: <https://www.gov.uk/government/publications/lune-catchment-flood-management-plan>.

(iii) Environment Agency, *Galgate Flood History*, 24 November 2017. See Appendix 1 for this map.

4. The most recent floods, on the night of 22-23 November 2017, caused severe devastation to (i) homes in Halton on the north bank of the River Lune, (ii) in Bowerham and Hala on the east side of the city through which flows Burrow Beck, and (iii) in Galgate to the south which was hit by the overflowing Shearset Beck, River Conder and Whitley Beck. Please note that the Whitley Beck, running steeply downhill and under the M6, normally flows through Galgate alongside and then under Stoney Lane, zig-zagging from one side to the other and back again, before crossing under Main Road (the A6) in the middle of Galgate to join the River Conder on the far side - except on those too frequent occasions when the Whitley Beck exceeds its water course capacity and pours down Stoney Lane itself and sweeps over Main Road at the traffic lights and on to Salford Road, before adding to the overflowing Conder. On the night of 21-22 November 2017 the whirling waters in the middle of Galgate were waist deep.

5. As required by National Planning Policy, the Planning Office employed consultants to consider flood risks in Lancaster District, and their report is incorporated in *A Local Plan for Lancaster District*

*2011-2031: Background Paper 5 - Flood Risk and Water Environment including Flood Risk Sequential Test.* Curiously, whereas the other five papers in this sequence of six 'Background Papers' are dated February 2018, this one is dated May 2018, in other words a month after the closing date for public responses to the Local Plan. The apparently more-than-up-the minute date is seriously misleading since the flood risk research upon which the report is substantially based was commissioned in 2016, in other words prior to the most recent and devastating floods hitting especially but certainly not only south Lancaster.

6. There are other aspects of the report which cause disquiet. *Background Paper 5* begins by setting out the Legal and Policy context, including the need to adhere to the National Planning Framework 2012 and National Planning Policy Guidance (NPPG) March 2014. While other issues are covered, the assessment of flood risk is central to this report. It is acknowledged, para 5.2, that flood events are becoming more frequent and effective management is required, and that, para 5.5, the Environment Agency required alterations to the draft document to take account of climate change. The NPPG also required Sequential Tests to be applied, with a strong preference for development on land with low risk. Zone 3 was regarded as high risk, and special measures were required if development on land so designated was unavoidable. Confidence in *Background Paper 5* takes a knock when one trawls through the detailed listing in 'Appendix 1 Sites within Category C of the Strategic Flood Risk Assessment proposed for allocation' – that is of sites subjected to closer Sequential Tests and identified rates of risk. Our interest is in BGV. The list identifies six sites as 'Part of BGV'. From what we see from the map *SG1/SG3 BGV Broad Area of Growth*, dated 14 December 2017, [refer to the frontiers part of our CLOUD report] one expected to see Whinney Carr and Carr Lane there listed. However, it is surprising (to say the least) that identified in the list but *not* named as Category C within BGV are land North and East of Bailrigg Lane; the Former Filter House Scotforth Road; land West of Highland Brow (that is land west of the railway as far as the canal and adjacent to the northern edge of Galgate); land South of Whinney Carr (that is adjacent to the Lancaster Canal); Whinney Carr and Burrow Heights (central to BGV); and Bailrigg Lane itself. Even more full of wonder is the inclusion as 'Part of BGV' of Former Bubbles Site, Marine Road (*that is in Morecambe*); Former Pontins Holiday Camp, Carr Lane (sic) (*next door to Morecambe*); land south of Forge Lane (*which is in Halton, on the north bank of the River Lune*), land South of Windermere Road (*uphill and close to Quernmore Road on the east side of Lancaster*); and South of Windermere Road, *Carnforth* [!]

7. What further undermines confidence in *Background Paper 5* is that it only relates to areas identified for housing or employment development. It takes no account of the road infrastructure which has to be constructed in order to service such a housing development site as BGV and also the University's Health Innovation Campus [HIC]. This is not surprising because no infrastructure plans have yet been devised, let alone published, to indicate how BGV and HIC are to be connected to the M6, and in the case of BGV also to the A6 and A588. Moreover, and here of critical importance, the flood risk implications of such structures have of course not yet been assessed, let alone made available for public scrutiny. And yet Para 10.11 of the Local Plan claims that it had been prepared not only with known flood risks in mind, 'with allocations made on land that is not vulnerable to future flooding', but also 'with an expectation that development should be designed in such a way as to *not create new flooding issues in future or exacerbate current problems* [emphasis added.]' In

fact, the projected BGV, described in Chapter 12 of the Local Plan, threatens to make a serious situation even worse.

8. For example, the Local Plan refers to BGV in Chap 12 and specifically in paragraphs 12.26-12.32 to Lancaster University Health Innovation Campus. Para 12.32 states that 'Given the site's proximity to Ou Beck, proposals will be expected to address any residual matters of drainage in a comprehensive and sustainable manner, making use of the Surface Water Hierarchy in accordance with Policy DM34 of Development Management DPD'. It is evident from the language that at date of publication, and even now before the final date for public responses to the Local Plan (6 April 2018), those obligations lie in the future. This surely is a matter about which the Planning Inspector will wish to inquire. Similarly, the opening description of 'Policy SG2 Lancaster University Health Innovation Campus' contains another future-facing statement, p.51: 'Development proposals for this site should be brought forward via a masterplan process that addresses the development of the whole Innovation Campus'. It is then stated that among the proposals that should be addressed include, pp.51-2, 'VIII. The preparation of a Flood Risk Assessment that details how, through the design, construction and occupation phases of development, proposals will deal with the matter of flood risk, particularly in relation to the Ou Beck watercourse. This should include suitable mitigation measures which can be delivered to the satisfaction of both the Environment Agency and the Lead Local Flood Authority'. This obligation is followed by another: 'IX. The submission of a comprehensive drainage plan which sets out how surface water will be managed on site.' It is not known whether or when these 'development proposals' have been submitted, whether and how the Environment Agency and Lead Local Flood Authority have responded, and whether or where such responses have been published. The importance of these matters is that

(i) while the Ou Beck has recently flooded, adding its quota to the water which swamped the A6 on 22-23 November 2017,

(ii) much more damaging was the Burrow Beck which is also adjacent to the HIC on its northern edge and yet is not mentioned, even though upstream it flooded properties and downstream it would flow through the proposed BGV on the western side of the A6, and

(iii) construction of the HIC has already commenced, and visual observation of large diameter pipes on the downward slope on the northern side of the HIC site strongly suggests that water drainage from the site will flow into the Burrow Beck. This would seem to compound the acknowledged problem of coping with flood risk on the BGV site as well as increasing the risk of water upstream backing up – the cause of much distress in November 2017.

Answers are needed as to what has been planned, what approvals have been given by whom and to what, and what confidence there can be in any reassurances offered.

9. We turn now specifically to the flood history of the village of Galgate and the increased risks its resident population of around 2000 is likely to face if the Local Plan development proposals are approved. The Environment Agency map of 'Likelihood of Flooding in this Area' shows Galgate to be in Zone 3, with already a 'High Probability' of flooding: <https://flood-map-for-planning.service.gov.uk/confirm-location?easting=348574.696&northing=455637.842&placeOrPostcode=Galgate>

10. Galgate, once a small 19<sup>th</sup>-century largely industrial village, has significantly increased in size by the construction of modern housing estates, including three in recent years, two of which are

currently (April 2018) being further extended. If developers have not installed - or are not installing - flood prevention measures then run-off from those developments will additionally be challenging the village's current drainage capacity. It certainly appears from a casual inspection of the on-going Silks housing development in Galgate that run-off from this site flows directly via a concrete pipe into Whitley Beck. It is important to know what drainage systems have been and are being required of developers, whether their installation has been monitored, and whether they are sufficient.

11. Compounding the problem has been run-off from the M6 motorway. This runs very close to the east edge of Galgate. This section of motorway – originally the Preston and Lancaster by-passes - was the UK's earliest motorway. Construction of the Lancaster section began in 1957. Visual inspection shows that water-run off from the motorway has cut a channel on the south side of Stoney Lane which in storm conditions adds to the water flowing down the Whitley Beck. A senior officer from the Environment Agency explained at a post-flood public meeting in Galgate that no flood-risk mitigation measures had been installed during construction of the motorway because run-off in wet weather was in those days not recognised as a risk. We were also informed that the EA had recently sought funding from central government for the remedial work it regarded as necessary, but the bid had been turned down because no money was available. [Private correspondence with EA Advisor, Flood and Coastal Risk Management, December 2017.] This legacy of risk remains.

12. In April 2018, four months after the November 2017 floods, the consequences in Galgate are visually still evident in empty properties and restoration work. Less obvious but serious have been the effects on householders who have suffered trauma and the loss of irreplaceable personal possessions – and they are also likely to face increased buildings insurance premiums.

13. With these past and recent flood issues in mind, the Local Plan for Lancaster District needs to be closely interrogated. The section headed 'Policy SG1- BGV' lists among its Key Principles on p.48 'Taking proper account of the need to reduce the impacts of Climate Change in the design of new development. This should assure that new development is resilient to the effects of Climate Change'. Please note that the phrase 'assure that new development is resilient' implies not just mitigation of risk but its elimination. This bullet point is followed by a second: 'Managing water and run-off to safeguard development, assuring public safety within the area and downstream [*N.B. and see para 11 below*] for both existing and new residents and businesses'. Again, note the word 'assuring'. It is worth recording that the Jacobs Report to Lancaster City Council on flooding was already warning about risks south of Lancaster in 2007. [Lancaster City Council, Strategic Flood Risk Assessment (SFRA), Jacobs Report, Sept 2007, pp.39-40, 50-51: text available on Lancaster City Council website.]

14. But where are now, and might be in the future, the areas at risk? The most recently published Local Plan map entitled 'SG1/SG3 BGV Broad Area of Growth' has much more extended frontiers than the one provided last year to the press and at public consultations. The BGV site, a 'broad area of growth', now embraces substantial areas east of the M6 and west of the canal as well as all the land from the southern edge of south Lancaster to the northern edge of Galgate – the promised 'separation' of BGV from communities to the north and to the south (para 12.16) seems to have been eliminated from this map. So it is reasonable to assume that the risk of flooding by Burrow

Beck, Ou Beck (Shearset Beck), River Conder and Whitley Beck have to be addressed – though, as past experience shows, properties *upstream* and not just *downstream* of the probable core site of BGV are also at risk.

15. What is troubling is that members of the planning department have claimed during consultation exercises (though it is not so stated in the published Local Plan) that ‘mitigating’ the risk of flooding at the site of BGV would also mitigate (not eliminate) the risk of flooding in Galgate. There is nothing in the Local Plan to indicate how addressing the flood risk caused by Burrow Beck, which flows around the south side of Lancaster and into the Lune, would resolve the existing flood problem from the completely separate Ou Beck, River Conder and Whitley Beck which run just to the north or through the middle of the village of Galgate and which all connect to become one river. Examination of the OS map and especially walking the banks of these water courses make obvious the current separation of these two zones.

16. In fact constructing BGV is much more likely to compound Galgate’s flood problem. Figure 7.3 on p.30 of the Local Plan confirms what local people understood from the consultation exercises, namely that at least the core of BGV would lie somewhere between the A6 and the A588 and closer to Scotforth to the north than to Galgate in the south. More precisely that core would lie between the railway to the east and the Lancaster Canal to the west. However, Para 12.19, p.47, and Policy SG3, p.54, concerning infrastructure and transport improvements, indicate that the village would be connected to a re-configured Junction 33 on the M6. This is the motorway junction south of Lancaster. It is self-evident that a road from BGV to Junction 33 would have to go over or dive under the railway, and from there it would connect to Hazelrigg Lane at the south side of the University, presumably where now are the traffic lights on the A6. This road would then have to head south east and then south across green fields to the east of the A6 and then on one side or the other of the current M6 - or possibly on both sides. Remarkably and worryingly there is currently no clarity on this matter in the Local Plan upon which the public had been expected to comment by 6 April 2018. Moreover, this new road for most of its length would have to be on an embankment paralleling the M6 and rising up to a height that would enable it, like the current six M6 carriageways, to cross above Stoney Lane as it made its way to Junction 33. This would of course involve crossing the River Conder and its flood plain and similarly crossing the Whitley Beck. As well as taking out substantial acres of agricultural land with their natural water absorption capacities, the water run-off from the carriageways of the new roads would only increase the risk of flooding in Galgate. Of course, flood mitigation (not elimination) measures would be factored in, but where, how, at what expense, and how effectively they would be has not been addressed. This is something which we trust the Planning Inspector will investigate.

17. Furthermore, it is disturbing to read in Policy SG1 BGV, p.49, and in the published Local Plan, para 12.24, that additional work on the Spatial Development Framework is only being undertaken in 2018 *after* the Local Plan has been published and public responses invited and that it is ‘anticipated’ that this work not be completed until early 2020. This does not seem to be a mistake. Indeed, we read in Policy SG1 – BGV, p.49, that while work on the Spatial Development Framework and the wider DPD has commenced it is only ‘anticipated’ to be ready for adoption ‘within the first five years of the plan (i.e. before 2024)’. That is a long time for people in Galgate to wait before even current flood dangers are addressed.

18. Moreover, even if BGV were to be approved, the road infrastructure would not be in place for very many years; and meanwhile Galgate and other repeatedly flooded Lancaster districts would be left vulnerable to inevitable further flooding. If indeed protecting these communities is high on the priorities of the planners, then it would be quicker, more effective and certainly cheaper to tackle the immediate problems of run-off from the motorway and to contain safely the flood waters which will still be cascading down the Lune, Burrow Beck, Ou Beck, Whitley Beck and Conder. At the well-attended public meeting in Galgate village hall after the November 2017 floods, there was a widespread demand for priority to be given to flood prevention measures for existing communities ahead of the construction of new houses. This view is not reflected in the Local Plan.

**[See Appendix 1 for Galgate Flood History Map 1998-2016]**

### 3b Road Infrastructure

We would like to draw the Inspector's attention to the exceptionally high road infrastructure requirements and costs for BGV to be viable and the funding uncertainties associated with it, asking the Local Authority to give evidence which demonstrates:

1. That the infrastructure requirements have been adequately costed.
2. That the list is comprehensive and can be delivered.
3. How it is to be funded.
4. That consideration has been given to the cost per house, especially when set alongside the need to mitigate flood risk to the village of Galgate.
5. An adequate explanation as to the reason that residents have had no updated information.

#### Infrastructure requirements

12.33 There are a number of infrastructure requirements that must be addressed in order to deliver BGV and they must be integral to the preparation of the Spatial Development Framework. Without the delivery of necessary strategic and local infrastructure it cannot be demonstrated that growth to the scale proposed is acceptable in planning terms.

BGV has exceptionally **high road infrastructure requirements** for it to be viable and accessible and these are identified as follows in Chapter 12 of the local plan:

12.36 Reconfiguration of Jt 33 of the M6

12.37 Improvement to the capacity of the A6 through:

A Rapid Bus Transit System

Cycle Superhighway

Road access to and from BGV to A6 (Scotforth Road) and  
A588 (Ashton Road)

#### 1. Have these been adequately costed?

The Infrastructure Delivery Schedule (IDS) pp.2-3 shows that most costs have not been calculated, so it is hard to form an accurate view of costs overall.

Table 1 below provides a summary of the road infrastructure requirements of BGV



**Table 1 Road Infrastructure requirements of BGV (IDS pp2-3)**

Project Title	Project description and priority- all critical except Park and Ride	Cost (2016 estimates in brackets)	Source of funding
Lancaster district rapid transit bus service	The creation of a rapid transit bus service to improve linkages between BGV Lancaster City Centre, Lancaster North etc	£10m (£16.5-36m)	
Cycling superhighway	The creation of new and improved cycling and walking linkages between South Lancaster, BGV and Lancaster City Centre including connections into the wider network.	£10m (not included 2016)	Bid to HIF -funding gap to be secured from developers
Junction 33 reconfiguration	The reconfiguration of Junction 33 to provide an improved standard of junction, reduce levels of motorway traffic moving through Galgate and to facilitate housing and economic growth in South Lancaster via BGV.	£40m (£40-60m)	£16m secured from LEP, Bid to HIF -funding gap to be secured by the developers
BGV Link Road	The creation of new highway linkages from Junction 33 of the M6 into BGV.	£5m (Not included 2016)	Ditto To be investigated under BGV Action Plan
Road Crossings of West Coast Mainline	The creation of crossings	To be investigated (£22m)	Ditto
Access arrangements into BGV via existing highway network	To investigate appropriate access arrangements into the garden village via the A6 (Scotforth Road & Lancaster Road) and the A583 (Ashton Road).	Ditto (Not included 2016)	Access arrangements to Garden Village to be explored through the AAP process.
Increase in junction capacity at Hala Junction	The provision of expanded junction to allow for right-turning traffic and to facilitate improved traffic movements	£700,000 (£700,000)	Funding secured via public sector
Traffic Management in South Lancaster	Investigating traffic management measures on the southern approaches to Lancaster City Centre via the A6 and A583 to ensure that priorities are given to Bus Rapid Transit Services.	To be investigated (c£10m)	Bid to HIF funding anticipated during the development
South Lancaster Park and Ride	The creation of a new Park and Ride Facility in South Lancaster to provide links between Junction 33 and Lancaster City Centre	Not applicable at this stage (Not included 2016)	

Source: IDS, pp2-3.

Where costings have been included it is striking that these appear to be at the lower end of the spectrum included in the [Lancashire County Transport Plan of December 2016](#) (p54). Several,

including access arrangements to BGV, and traffic management in South Lancaster, remain 'to be investigated'.

The IDS refers to Road Crossings of West Coast Mainline with the statement 'To be investigated'. These are crucial to the viability of the garden village as currently there is only a tractor track under the railway and two narrow lanes over bridges, both followed by 90 degree bends, to access the proposed area from the A6.

The substantial bridge which had to be constructed to carry the Heysham /M6 link road over the West Coast Mainline gives some indication of what would be needed at BGV.

The 2016 Transport Plan estimated road infrastructure costs of between **£87m and £127m** for South Lancaster development associated with BGV but excluding the cycle superhighway. The depreciation of sterling and rising labour costs since 2016 mean building costs will have risen, so this looks like an underestimate. The recent history of Lancashire road projects running over budget gives added cause for concern. In 2001 outline costs for the Bay Gateway at Jt 34 of the M6 were put at £62m, Lancashire County Council estimates in 2004-5 stood at £87m, and the final cost by 2016 was around £140m.

## **2. Is the list comprehensive and how can it be delivered?**

The list included in both 12.37 and the IDS is incomplete. Reference to the [map for BGV](#) shows that accessing Ashton Road from BGV, as proposed, would require a new road crossing of the canal. There is no mention of this in Chapter 12 or in the Infrastructure Delivery Schedule. What are the difficulties of bridging the canal, how much will this add to infrastructure costs and how will it be achieved?

Much remains 'to be investigated', such as how the rapid bus transit system and cycle Superhighway will integrate with the A6 through Scotforth. How will car parking on the A6 and the A588 close to Lancaster city centre be dealt with, and are there plans to demolish houses to make space?

## **3. How is it to be funded?**

A bid for £150m was submitted to the Housing Infrastructure Fund in 2017. In March 2018 it was announced that Lancashire was among the 44 successful regions which were shortlisted to apply for government funding. This does not mean that funding has been agreed or will be agreed in full. This also raises the question of how large the funding gap might be even should the funding, be secured and also how will the plan proceed without significantly raising levels of congestion and air pollution in South Lancaster. The level of financial uncertainty surrounding the crucial road infrastructure gives significant cause for concern.

Guidance from the Department for Communities and Local Government states that *"The Local Plan should make clear, for at least the first 5 years, what infrastructure is required, who is going to fund and provide it, and how it relates to the anticipated rate and phasing of development. This may help in reviewing the plan and in development management decisions.....Where the deliverability of*

*critical infrastructure is uncertain then the plan should address the consequences of this, including possible contingency arrangements and alternative strategies.”*

(Source : [Department for Communities and Local Government](#) Part of: [Planning practice guidance](#) and [Planning system](#) published: 19 May 2016 Last updated: 28 July 2017, Paragraph: 001 Reference ID: 12-001-20170728)

#### **4. Has consideration been given to the cost per house, especially when set alongside the need to mitigate flood risk to the village of Galgate?**

Assuming 3500 houses in BGV, the infrastructure cost of between £87M and £127M represents a cost per house of between £24,857 and £36,285. It is hard to see this as value for money or an attractive investment opportunity for developers who would be faced with financing any funding gap as explained in 12.39. The Local Plan fails to indicate whether other potential housing development sites in Lancaster have been evaluated to see whether they might offer better value for money.

#### **5. Why have residents had no updated information?**

Road infrastructure is a crucial part of the Local Plan and, as applied to South Lancaster, it revolves around BGV. Residents have received no new information since the first drop in sessions in February 2017. A set of drop in sessions in October 2017 to discuss what BGV would look like and especially how infrastructure might be developed provided no new insights. This means that this observation sent in March 2017 remains valid:

*Local residents have been denied any opportunity to comment on the transport impact of the Local Plan. For example, the Local Plan envisages a reconfiguration of Junction 33 on the M6 with new slip roads connecting to Hazelrigg Lane, but fails to provide any details of the proposed road layout. While perhaps relieving congestion in Galgate, this reconfiguration would create a new congestion point at the Hazelrigg Lane/A6 junction, just ¾ mile from Galgate. It would do nothing to reduce traffic flow along the A6 into Lancaster city centre and might even encourage an increase. The Highways and Transport Master Plan already recognises (page 20) that “Lancaster’s gyratory system is effectively throttling the city centre” and that “the A6 corridor in particular is very busy with significant congestion at the Pointer roundabout and the A6/Hala Road junction”. The A6 route management plan is intended to be Lancashire County Council’s solution to these problems and the fact that it is not available now, even in a draft form, prevents a meaningful assessment of the Local Plan by Lancaster residents.*

### **3c Traffic and Transportation**

We would like to bring to the Inspector's attention the degree to which we believe the Local Planning Authority has neglected in the preparation of the plan for BGV the diligent assessment of the impact of 3,500 to 5,000 new dwellings on the local transportation network and air pollution. In November 2017 we wrote to the Authority making a number of points. Firstly, based on a national average household size of 2.4 people, we estimated the population of BGV when fully developed as between of 8,400 to 12,000 people. We asked the Authority to correct this assumption if they felt it inaccurate. In their reply they did not do so.

We then made what we believe was a reasonable assumption that a diligent planning authority would have carried out some form of analysis of the impact of such a major and concentrated land use change on what is a local road network which is relatively constrained in terms of the access to different routes and existing traffic volumes, especially through Lancaster Town Centre. Specifically, we asked questions about: (a) what proportion of the adult population they had assumed would travel to work each day, (b) where their land use planning assumed they would work, (c) how they calculated they would travel (for example by bus or car), and (d) what impact the resulting analysis would have on the road network in terms of traffic volumes. We asked the same questions about trips to and from school. Finally given the likely traffic volumes we asked what options they or the County Council had for accommodating the additional demand and what would happen if no changes were made to the network.

The Authority's reply was disappointing in the extreme. It contained only two material facts. Firstly, the reply affected to imply that we had assumed that all the additional journeys would be by car (clearly, we had not) and then pointed to the proximity of the University bus interchange. They then went on to state that the analysis we asked about "had not yet been carried out". Basically, they have no idea of the impact of the BGV on the current transportation network. In respect of the suggestion that the University Bus Interchange might act as a transportation hub, the Inspector may wish to include this in his/her site visits to form conclusions on its ability to cope with any significant increase in services.

In summary, given the lack of the essential transportation analysis any adoption of a plan which includes the BGV is premature and should not be allowed. Naturally, we would welcome the implementation of a study the like of which we have suggested and would be happy to provide our views on this at a public inquiry into the plan.

The Inspector may wish to know that after the reply (dated 14<sup>th</sup> November) was received, a similar submission to our letter was made by written representation to the full Council Adoption meeting on 20<sup>th</sup> December 2017 so that members and senior officers had an opportunity to raise these matters and identify what work they had carried out or had planned to carry out in response; it was not discussed so as far as we are aware and no action has been taken to address these concerns.

### 3d Air Quality

The air quality in Lancaster is already very poor, with a large Air Quality Management Area (AQMA) having been declared for the whole of the city centre, along with additional AQMAs in Carnforth and Galgate. The whole of the A6 corridor is a congested source of pollution, with countless residential properties and schools along its length. There is an air quality monitor outside a residential dwelling at the Hala Road/A6 junction, which in 2016 recorded an annual mean for NO<sub>2</sub> of 36µg/m<sup>3</sup> against an objective of 40µg/m<sup>3</sup>. The monitors in Galgate are much worse. (Source: Lancaster City Council Local Air Quality Management Annual Status Report 2017) This is the situation at the moment, with over 80% of urban pollution being emitted by vehicles. The BGV proposes to build 3,500 new residential dwellings, which will result in thousands more vehicles journeys every day, the vast majority of which will be using the A6.

At the local development council meeting the chief planning officer stated that a modal shift in transportation will have to occur in the next few years, but the council has done nothing to shift people away from vehicles since the AQMAs were declared almost ten years ago. Instead, for the BGV to be viable, £60+ million will be spent altering Jt 33 of the M6. Forty years of road building has shown that building more roads encourages more traffic.

<https://www.cpre.org.uk/resources/transport/roads/item/4543-the-end-of-the-road-challenging-the-road-building-consensus>. This is a colossal waste of money. Moving the junction will improve the air quality in Galgate, but it will only shift the problem to other sections of the A6. The A6 corridor between the University and the Pointer roundabout will end up with some of the poorest air quality outside of London.

The volume of traffic that the BGV will generate will put lives in great danger as the levels of air pollution will continue to soar above safe limits. Currently the council has a duty to monitor air quality but has no legal obligation to improve it. However, the UK Government has been successfully sued by Client Earth over its inaction on air quality, and has now decided to 'pass the buck' onto local authorities. Bristol City Council have been sent a warning letter from an environmental firm of lawyers over the lack of improvements to their local air quality. Lancaster could be next.

It is not just human health that is at risk from air pollution. Ecological habitats are also at risk from poor air quality. The outline design for the BGV indicates that there would be an access road on Ashton Road. This road is adjacent to the Morecambe Bay Ramsar Site, the Lune Valley Site of Special Scientific Interest and the Morecambe Bay Special Area of Conservation. Air quality guidance indicates that an air quality ecological assessment is required for any development generating more than 1,000 additional vehicles per day if a designated habitat is less than 200m from the road.

### **3e Health Services and Education**

#### **Health Services**

The DPD section 5.69 acknowledges that the district already has an ageing population and one that is forecast to grow. It is widely accepted that with such a population come greater demands on health services, not only GPs but also hospital facilities for scans etc. and access to specialist consultants. Section 5.70 goes on to say that provision, such as healthcare, for such a population should be accessible, in particular by those without access to a car.

It is contrary to the above therefore that in the Infrastructure Development Plan (IDP) section A.6 under planned future health provision it is stated that the district is moving to a more centralised scheme with 3 key locations:

Heysham

Central Lancaster

North Lancaster

Surely it would make sense to put the high density housing closer to one of these.

Also in the IDP section A.10 the city council acknowledge that the Ambulance Service is already facing increased demands and yet 'The city council are not aware of any plans or proposals for new or expanded ambulance stations within the district.' The same is stated for the Fire and Rescue service in A12

In section 12 of The Local Plan, BGV, it is repeatedly stated that car use should be kept to a minimum and the village is described as 'self-contained'. In order for this to happen there need to be more facilities on site. It is impossible to comment further on this as all detail will remain unavailable until the release of the BGV Action Plan DPD possibly by early 2020. It would make more sense to have the public consultation then to enable a sound and proper consultation process.

#### **Education provision at BGV**

Section 12.41 of the BGV document acknowledges that there is an identified need for education facilities within the Garden Village. It states that a primary school 'will be delivered directly as part of the development.' As local authorities no longer build schools is it then to be assumed that the developers are funding this or has an Academy already been found to fund it? The detail is crucial as provision of schools are integral to the scheme's sustainability and viability.

Regarding secondary school provision 12.41 also states that 'The delivery of a secondary school meets a wider strategic need for Lancaster and whilst located in the Garden Village it should be funded through an appropriate infrastructure tariff which will be applied to wider growth within the district.' It is very unclear as to what 'an appropriate infrastructure tariff' actually is. Again, has an Academy Trust shown an interest and willingness to invest? No details are given, and yet the provision of such a school is integral to the BGV plan and is promoted as a substantial part of its justification.

The Inset plan needs to show land reserved for the 2 primary schools and the secondary school.

### 3f Garden village boundaries

1. The people of Lancaster were first made publicly aware of BGV in a Special Report in the *Lancaster Guardian*, 5 Jan 2017, p.8. This featured a so-called 'Concept plan', which must have been provided by the Planning Department. This, though somewhat unclear in the newspaper, seemed to indicate that BGV's northern frontier would run eastwards from the M6 along the southern edge of Lancaster, and over the A6 to wrap around and partly up the western edge of Scotforth. South from that point the western boundary of BGV was to be the Lancaster canal, and the southern edge would be Meadow Park on the northern edge of Galgate. From there the line would run eastwards until it reached the narrow lane running north alongside the railway embankment, and the boundary would then head back up to Scotforth. In addition, a block of land to the east of the railway and A6 was marked, and as far as the M6 but only to the north of the Health Innovation Campus and Bailrigg village (not to be confused with BGV). The only land on the far side of the M6 appeared to be blocks of land owned by the University at Hazelrigg and Forrest Hills. Strongly marked on this map were small spaces marked in green as landscaped or wooded area. These were noticeably a narrow band on the northern border with Scotforth and one on the southern border with Meadow Park. (The *Lancaster Guardian* included with its report a photograph of Letchworth Garden City, so misleading about the distinction between a 'Village' and a 'City' as to border on the fraudulent.)

2. There followed drop-in sessions organised by the Council at which Lancaster people were invited to comment on the draft Local Plan. A map, dated 25 January 2017, (See Appendix 2 for Map) which was produced for these sessions, again defined the frontiers of BGV. Indicated by a dotted line, the boundaries were substantially the same as in the press release. Notably, only as a small sliver of land at the northern edge of BGV and west of the canal was marked as included. However, the northern frontier was tight against the current boundary of Scotforth, with no 'Open Space' there marked (except current allotments), but a very large area in the south, marked EN8, and stretching some way north of Galgate, was marked as an 'Area of Separation'.

3. Related material on the council website is contained in the 'Part 1 Strategic Policies and Land Allocations DPD'. Chapter 22.44 (p.151) Policy EN8: Areas of Separation' where it is stated that it is 'the Council's intention to provide further Areas of Separation to the South of Lancaster as part of BGV, to provide separation from the new development from Galgate and South Lancaster, these areas will be specifically defined with the forthcoming BGV Area Action Plan DPD. This does not cohere with what the map seemed to indicate, but it was at least laying down the principle that BGV would be a distinct and separate development. Indeed, a senior official at the consultations was emphatic on this point: this was not a suburb of Lancaster and it would preserve Galgate as a distinctly separate community. Many people in Scotforth and in Galgate will have been reassured by the map and its interpretation by officers. (However, one CLOUD member was told that the plan to build 3500 houses in BGV was relevant only to the period of the current plan, and it was conceded that a subsequent plan might increase the size of BGV to accommodate up to 5000 houses. This could intrude into the 'Area of Separation'. No doubt much of the infrastructure to be put in place for this first phase would be designed to cope with any future extension.)

4. It is therefore important to stress that the most recent map published by the Council, dated 14 December 2017, does more than resurrect the first map described in paragraph 1 above, and it is far

less reassuring than what is described in paragraph 2. It is entitled as 'SG1/SG3 – BGV Broad Area of Growth' - itself a disturbing phrase.

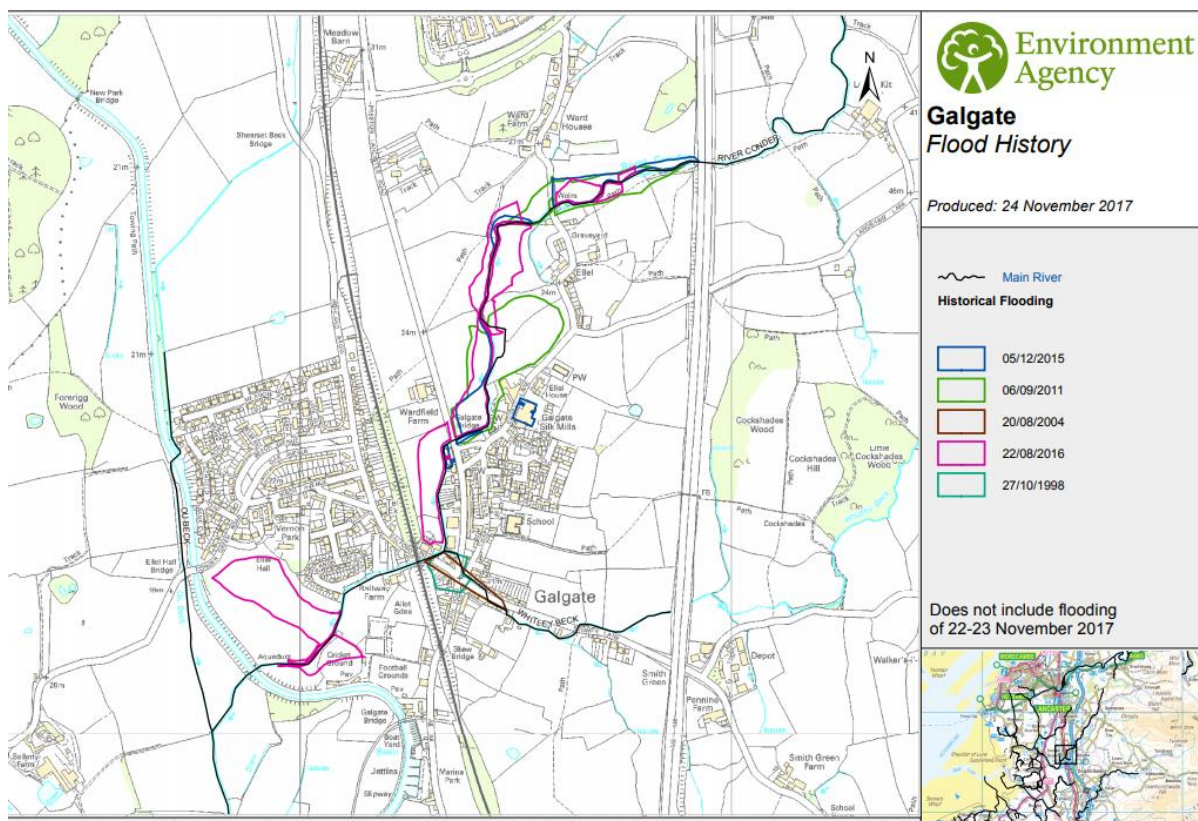
[http://www.lancaster.gov.uk/assets/attach/3344/SPLA\\_Jan2018\\_BGV.pdf](http://www.lancaster.gov.uk/assets/attach/3344/SPLA_Jan2018_BGV.pdf) First, this map does not indicate 'Areas of Separation' to the north or even to the south of the site. Second, it includes for the first time a substantial block of land between the Lancaster Canal to the east and Ashton Road to the west. Third, all land to the east in line with Meadow Park in Galgate is now included in this 'broad area of growth' - up to and over the railway. The line continues still further east, from the railway to the A6, and yet further east over Chapel Lane (north side of Galgate) and up Kit Brow Lane. From there the boundary heads up north on the previously defined line – although a further block of land adjacent to Hazelrigg Lane, once excluded, is now included. In the Plan published in December 2017 there is no explanation and not even a mention of these furtive boundary extensions.

5. In paragraph 12.2 of the Plan there is reference to the National Planning Policy Framework and the principles of Garden Cities [though this is to be a 'village']. These include establishing where appropriate 'Green Belt around or adjoining such new development'. One might expect therefore some mapped indication of where this greenbelt around BGV might be located. We are told, para 12.16, that 'Areas of Separation' will 'ensure visual separation between the new development and the existing boundaries of South Lancaster and ensure that self-contained settlements, such as Galgate do not merge with the wider urban areas of the district'. A similar assertion is made in 'Policy SG1 – BGV'. It is disconcerting that these admirably pious aspirations are no longer demonstrated in the most obvious way – by mapping 'Areas of Separation' – and by firm commitments to their permanent preservation. Questions need to be asked.

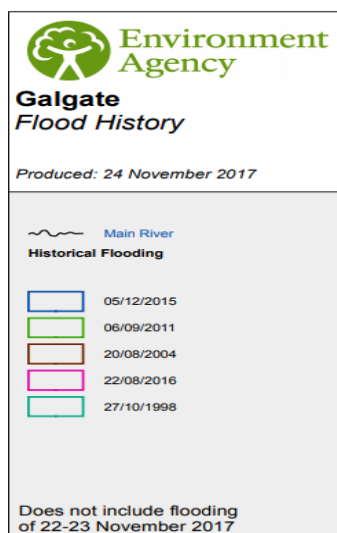
**See Appendix 2 January 2017 Map of BGV Boundaries, Lancaster City Council.**



## Appendix 1 Galgate Flood History



### Key to Map



Source: Environment Agency, Ian Counce supplied 24 November 2018

## Appendix 2 January 2017 Map of BGV Boundaries, Lancaster City Council.

