

Dear Planning Policy Team

With respect to the Local Plan, I am responding as Chair of CLOUD to the invitation to comment on the modifications recently made particularly to the **Strategic Policies and Land Allocations DPD**.

My observations relate to page numbers and policy numbers, and I have also indicated the topic at the head of my paragraphs.

p.10, para 1.18. Sustainability Appraisal. I have inquired of officers at several public meetings about the meaning of the word 'sustainability', but have not been given a clear definition or an indication of the criteria by which sustainability is to be assessed and measured, and yet it is evidently a term used by professional planners. This modification does not provide enlightenment, and yet **before** action can be taken detailed criteria are needed by which 'sustainability' is to be assessed and also **during** developments so as to ensure obligations are being met.

These observations relate also to **p.23, Policy SP1, Presumption in Favour of Sustainable Development**. Ignoring the use yet again of 'Sustainable', my reading of the modification is that the NPPF requires planners to take seriously the adverse impacts of developments. I trust that planners in making such assessments will not only take this obligation seriously but will publish the criteria by which they will weigh readily assessed **known** losses against **aspirational** gains.

p.20, SO4. Air Quality. Given what is well-known about the need to tackle air pollution it is curious, even alarming, that this key issue has only now been added to the Local Plan rather than being an original core objective. But how is it to be achieved? More housing adjacent to already congested roads, particularly on the A6 and Ashton Road, will only compound traffic congestion at existing or new pinch points. Quite properly, there is no reference here to electric cars, cycling superhighways and a Bus Rapid Transport systems as 'solutions'. And here is a case in point. A very recent application to build a housing estate of 70-odd homes on land at Ward Field Farm on the north edge of Galgate was approved by a planning committee **in spite of the twice-repeated objections of the Council's own Air Quality Officer**. I see no evidence of any recent action taken by council to reduce air pollution, but much evidence of allowing housing developments, in Galgate and elsewhere, which can only make matters worse. What is written in the modified Plan is aspiration without any indication of how it will be realised.

p.22. Key Diagram. There is no acknowledgement that this map contains modifications to previous published maps, and that is a serious omission. Two areas close to Galgate are identified as **employment areas**. One is south of the University, and this is not the Health Innovation Centre. So what is the other which seems to be within the boundary of 'Bailrigg Garden Village'? I had been led to believe that this was to be a housing estate, with some service provision (schools, health centre?). It seems to extend to the northern edge of Galgate. The other employment area is presumably the Junction 33 Agri-Business Centre (see **figure 7.3, p.31**), which is adjacent to the south side of the village. These modifications

to the Plan make a nonsense of the labelling of Galgate on the map as a 'Sustainable Rural Settlement'. If plans go ahead as proposed, Galgate will become an urban extension of Lancaster.

p.25, Policy SP2, Lancaster Settlement Hierarchy. This relates to the previous item. Galgate was referred to in the map on p.22 as a 'Sustainable Rural Settlement', and so it appears in the box. But its fate seems to be 'the focus of growth for Lancaster district outside the main urban areas'. There is an inconsistency here between policies, since **SP2** has already dismissed adverse impacts which **SP1** requires planners to assess, impartially. I also draw attention to **p.27, para 7.18**, modified to the extent of it now being separately numbered and therefore drawing to it particular attention. Here we read that the development needs of 'Sustainable Settlements', among which Galgate had previously been numbered, 'will vary according to opportunities and constraints of the specific locality'. One would feel more confident of how the 'opportunities' and the 'constraints' were to be weighed if Galgate had not already been identified as a 'focus for growth'. I notice, however, **p.102, Policy EC1**, and **p.151, Policy DOS4, Employment Areas**, that Galgate Mill is identified as a rural employment site, and with that aspiration I have no problem since the structure needs to be restored and there is adjacent car-parking space. While that will inevitably generate traffic from and to the A6, it is a trade-off which I would accept, whereas building on greenfield sites around Galgate is not. And for that reason I have serious reservations, already mentioned, concerning the Agri-Business Centre on a greenfield site on the south edge of Galgate near Junction 33, see **p.108, EC3**. If this is to occur, then the development and all future use of the site must be very closely monitored, but I have the worrying impression that cash-strapped councils are understaffed for supervisions and inspections.

pp.30-35, Chapter 8, Economic Growth. The wording in this chapter has been little modified, so one is inhibited from making comments, though as before one would have appreciated indications beyond aspirations of what might be reasonably anticipated growths in jobs under alternative scenarios. Important here is where they might best be generated, given already existing road and service infrastructures, which are particularly already evident (including a 'cycling superhighway') north of the river and definitely not so to the south. It is certainly not apparent what are the 'wider employment opportunities associated with Bailrigg Garden Village', as **SP4 states, p.33**. All we are told, in a modification of wording on **p.36, SP5**, is that the Local Plan now seeks an increase to 59.5 hectares of employment land to provide for the creation of new jobs in a variety and range of economic sectors. Are we to assume that projected job demands account for this, and if so, should not the numbers have been incorporated in the modified wording of this document?

pp.35-41, Chapter 9 and Policies SP6 and SP7, Housing These pages have been very substantially altered, and are confusing. **Para 9.19, p.38**, states that there is a reduction from 12,000 to just over 9000 in the number (meaning 'net number') of new dwellings the Council will now seek to deliver over the period 2011/12 to 2033/34, equivalent to a reduction in the annual requirement from 522 dwellings a year to 455. The assumed demand for houses between now and 2033/34 is presumably based on a substantial but aspirational increase in local employment and consequent immigration. Or is it based on a substantial increase in household demand due to demographic changes? Figures issued by

the Office of National Statistics state that 131 new dwellings per year are required to meet projected household growth in Lancaster District. Some explanation of the projections should have been provided. In fact, over 23 years and at the rate of 455 houses a year that would mean 10,465 houses would be built, 2011/12 to 2033/34. However, in **SP6, p.40**, it is stated that in the 'plan period' 2011/12 to 2030/31 (not 2011/12-2033/34), 522 dwellings a year would be built, but that would be equivalent to a net increase of 9100. For a variety of reasons mentioned in **para 9.23**, the expected and presumably therefore net delivery requirement is similarly reduced, to 9,124 dwellings. But of course what is not accounted for in either calculation is the location of the 10,465 new builds. These are certainly not likely to be on the sites where houses have been 'lost' by 'small site delivery', demolitions and 'changes of use'. It is pretty certain that 10,465 new houses would be built on greenfield sites, as beloved by developers, rather than squeezed into small plots and brownfield sites. Returning to the phrase 'plan period' on **p.40, SP6 box**, I notice that the net increase in the number of dwellings anticipated in the 'plan period' – which I assume is still 2011/12 to 2030/31 – is 9158. Of these, 460, reduced from 1655, would be built on the Bailrigg Garden Village site by 2030/31. One is left to speculate on the infrastructure cost including road connections needed to service those 460 homes. It is my deduction that what is intended is to spend most of the years before 2030/31 laying down that infrastructure, thus committing the Council to substantial building on site over many subsequent years. Perhaps that commitment could have been transparently incorporated in the 'modifications'.

Reflecting also on homes on the Bailrigg Garden Village site, and elsewhere, I was left puzzled and disappointed that there is no reference in this DPD to social or even affordable housing among the new builds, in spite of the considerable emphasis on such accommodation in the Council's 'Ambitions: Our Council Plan 2018-2022' document, published and put out to public consultation in April 2018. The primary requirements in the UK and not least in Lancaster District are social and affordable homes, not market-priced homes for the better off. But I see from modifications in the **Development Management DPD, pp.18-19, Policy DM3**, that what is now expected of developers has been changed from a 'minimum' of 40% of affordable houses on greenfield sites, like the Garden Village site, to a mere 'target' of 30%. It is inconceivable that speculative developers, attracted by what is already being presented as a prestigious housing estate – on a greenfield site by a rural canal, across the road from a world-class university and splendid sports centre, and with ready access to the M6 – will be at all interested in putting up any affordable homes. Since the Local Plan currently contains a commitment to build up to 3500 'Garden Village' homes, the percentage of affordable homes which developers might agree to construct are certain to be a very long way below the 'target' figure of 30%. And, *if approved by funders*, the Council will have committed itself to the infrastructure provision, and will be seriously handicapped in any 'negotiation' with developers.

pp.42-45, Chapters 9 and 10, Policies SP7 and SP8, Housing Delivery, Natural Environment. I applaud these substantial modifications, which rightly recognise and seek to preserve and even enhance the historical and environmental attractions of this area – with their implications for revenue generated by visitors. That said, what is clearly at risk is the impact of business and housing developments in or adjacent to such attractions. May I refer you to what I have written above, with reference to **p.23, Policy SP1**, and the need for

planners to take seriously the obligation set down in the NPPF? Planners must take seriously the adverse impacts of developments, and accordingly do more to prevent and not just 'mitigate' (a word too often used but meaning only limiting collateral damage) any adverse impact on irreplaceable assets. Reference is made in these pages to the environment adjacent to the Lancaster Canal and to the historic Burrow site. Elsewhere in the DPD Galgate is described as a 'rural settlement'. But Bailrigg Garden Village and its intrusive to the point of destructive infrastructures will not be compatible with the aspirations set out eloquently in these four pages. Starkly incompatible with the tone is what is asserted on **p.45, 10.13**, that allocations of land for development will not be on land vulnerable to 'future flooding' and that there will be 'an expectation' (a disturbingly weak word in this context) that 'development should be designed in such a way as to not create new flooding issues'. What about old flooding issues, and well-attested (by Lancaster University environmental scientists) signs of global warming? We have seen no practical response to recent flooding in south Lancaster - in Hala, Bowerham, on the anticipated Bailrigg Garden Village site and in Galgate, devastated on 22 November and, nearly a year on, still in a state of disrepair.

p.46, Policy SP9, Vibrant Communities. The modification now refers to the provision of 'education and **healthcare**' for existing and new residents. Again the aspiration is wholesome, but long before a bulldozer moves and a sod is turned, how can you ensure that schools and clinics will be built, in Bailrigg Garden Village, for example, and that the RLI will be additionally equipped especially with staff? There might be funds, somewhere, for houses and roads, and developers will insist that such is all that is needed. But what guarantees can be secured for spending on teachers, doctors, nurses and other essential staff? I note that **p.46, para 11.4** refers to protecting such facilities as public houses, churches, village halls, community gardens, community centres, and local shops, and now, as a modification of the original wording, GP practices and healthcare clinics have been added. I don't know how pubs and shops and several other of these desirable assets can be protected, but with respect to health care and schools, to protection must be added provision. To take a case, the developers of the Ward Field Farm site are committed to providing one school place at the Galgate village school, Ellet St Johns. Who ensures developers deliver on these commitments? In any event, Ellet St Johns, surrounded by three recent and substantial housing estates, one more approved, a fifth waiting on a decision, is already over-subscribed and the site will not support more classrooms. Unless, on day 1, Bailrigg Garden Village has primary and secondary schools on site, more 'school run' traffic is inevitable. Here I cross-reference to **pp.75-6, SG8**, concerning East Lancaster. I quote: *'The provision of additional school places at a primary level. To achieve this it is expected that new development funds [I think 'will fund' is meant] the creation of a new primary school within Strategic Site SG7 in an appropriate, convenient and accessible location to be agreed with the education authority. The new primary school should be single form entry in size however [it] should be provided on a plot which could be expanded in the future to create a two-form entry school. The delivery of the new school should be commissioned and delivered in partnership with the education authority'*. This is followed by *'provision of additional school places at a secondary level. To achieve this it is expected that contributions will be made towards the delivery of a new secondary which will increase the range of secondary school places in the district to meet projected future needs'*. Marvellous,

but a reference has then been deleted to a school in 'South Lancaster at Bailrigg Garden Village'. The contrast between what is written in this revised DPD about East Lancaster confirms my impression that everything about Bailrigg Garden Village remains an under-researched aspiration.

p.49, para 12.2, Bailrigg Garden Village. This modified paragraph encapsulates the problem without offering a solution and it raises more concerns. Garden villages are supposed to 'ensure that their size and location will support a sustainable community, *with sufficient access to services and employment opportunities within the development itself*' (My italics and emphasis). This, of course, was the concept set down by Ebenezer Howard in his 1898 manifesto *Garden Cities of Tomorrow*. I stress the word 'Cities', for what Howard had in mind became the garden cities of Letchworth, Welwyn and ultimately Milton Keynes and other 'new towns'. Those places were not intended to be villages (or suburbs) but to be economically self-supporting, with houses, recreational, shopping and social services built into their design and construction. Bailrigg Garden Village will not be a 'sustainable community' (there's that word again) but dependent on external services – and not just for schools, but for employment. I am disturbed that the phrase 'a self-contained Garden Village' on **p.50, para 12.3** has not been modified by being deleted. There had been no suggestion before this modified DPD was published that on site there would be 'employment opportunities' - such as? A supermarket? Shops? I hope it is not seriously envisaged that the University is going to be investing in employment facilities across the A6. I would be intrigued to learn, see the modification on **p.52, SG2**, how the 'delivery of Lancaster University Health Innovation Campus' is going to be assisted by 'opportunities' (for what?) across the A6. I also note with curiosity the deletion, **p.52**, of **para 12.19**, whose contents had been substantially marketed at public consultations to flag up how 'green' would be this housing estate. Instead, the new aspiration, **p.53, SG1**, is to 'Seek to encourage economic growth within the Garden Village to create new jobs, investment and economic opportunity'. Moreover, **p.122, Figure 19.1**, the Lancaster District Retail Hierarchy map, even accords the 'village' the status of a retail centre. It is being made to sound as if the 'garden village' is a business park, with attendant traffic generation, and that seems confirmed further on **p.126, Policy TC3**. Puzzling and disturbing.

p.56, SG2, Health Innovation Campus and Flooding. There is reference in a modification to the text to Ou Beck and flood risk on the Health Innovation Campus. However, having recently observed building on the site I am disturbed that there is no reference to the more obvious and more serious problem of Burrow Beck which in November very badly flooded both upstream of HIC, then over the surface of the A6, and then downstream through what is envisaged as the site of Bailrigg Garden Village. Pipes from the HIC site lead into Burrow Beck, close to where it goes under the A6. We are told that all is safe because water catchments in tanks will store and slowly release. Those installed upstream were filled to capacity on 22 November and that triggered their sudden discharge, which sent a destructive tidal wave through Bowerham and Hala. Not incidentally to all this, Ou Beck itself, which becomes the Shearset Beck on the west side of the A6, caused flooding by the canal in Galgate, and, since the Shearset Beck flows into the River Conder immediately to the west of the canal, it also made its contribution to flooding farmland as far as Conder

Green. And the Conder, as I hope is well-recognised, has devastated Galgate, repeatedly – and nothing adequate has ever been done about that.

p.59, Policy SG3, Infrastructure. It is something that the infrastructural challenges which south Lancaster (including Galgate) face are acknowledged. However, it is disheartening that nothing is being done to address current problems (see previous paragraph) and it is also deeply concerning that, nearly a year after the Council ‘approved’ the Local Plan, we are not told anything in this consultation document about the funding, delivery, or phasing of an unrevealed infrastructure schemes which, if engineered, will have a radical, irreversible and certainly negative impact on south Lancaster. The very integrity of the Local Plan, with its huge emphasis on south Lancaster, is cast into doubt. I am also puzzled by language. With reference to access to the M6, what exactly is meant by ‘In order to achieve this the Council has identified an area of search for the newly re-configured Junction 33’. Where exactly did you see it last? More seriously, why has ‘The provision of sufficient public open space to fully meet the amenity and recreational needs of the residents in the Garden Village’ been deleted?

pp.60-68, Policies SG4 and SG5, Lancaster City Centre and Canal Corridor. The modifications are considerable and are a consequence of officers and councillors having the courage and determination to scrap a previous scheme. It shows what objective reassessments can avoid, allowing better alternatives to be considered. A precedent worth remembering.

pp.78-83, Policy SG9 and SG10, North Lancaster. I was encouraged to read modifications which confirm what is said on **p.78, paras 15.1 and 15.2**, that land in North Lancaster and south of the Bay Gateway is to be made available ‘to meet residential and employment development needs...in a location that has strong access to the national motorway network, key employment areas in the district and Lancaster City Centre’. There is even there a cycling superhighway. Plus supermarkets, a sports centre, childcare facilities and, not least important, Lancaster’s waste recycling facilities. I have long felt it odd that the route from the M6 via Bay Gateway, constructed at huge expense and well over budget and connecting to good roads all the way to Heysham and Morecambe, which was designed and funded to spark business developments with housing developments close by, seemed to be neglected as a development area. And yet south Lancaster, hemmed in by canal and railway and not connected to the M6 except south of Galgate, was the trumpeted key development area. And it is one that would require huge transport and social infrastructure investment. I hope that the imaginative policy to the north will lead to less damaging development to the south. I note in passing that the reference to a school in south Lancaster remains (but no longer specifically in Bailrigg Garden Village), which seems at variance with what is written about East Lancaster schools on **pp.75-6, SG8**, quoted above.

p.167, Policy EN8, Areas of Separation. Such is the work still to be done in preparing a proper Bailrigg Garden Village plan that all we are told in a modified paragraph is that it is ‘the Council’s intention’ to provide ‘Areas of Separation’ to separate Bailrigg Garden Village from south Lancaster at one end and Galgate at the other. Areas of separation have been indicated before on publicly available maps, and their frontiers at both ends have moved

about. But we have still to wait for the 'forthcoming' Bailrigg Garden Village Area Action Plan DPD to see what is now going to be proposed. And will we be able to comment when it forthcomes? I think we should. This is important because an inserted sentence states that 'Development proposals within Areas of Separation will be considered against how such proposals affect the openness and visual amenity of this area. Proposals will not be supported where they have impacts on wider openness and result in the coalescence between settlements areas and effect overall distinctiveness'. It seems that areas of separation are open to negotiation.

Yours sincerely

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