



## CLOUD.

### Objections to proposed Ward Field Farm development, Galgate.

1. In order to respond appropriately to this proposal it needs to be placed in context. The public consultation early in 2018 on an outline application by Hollins Strategic Land LLP to build an estate of 70 houses at Ward Field Farm prompted one response in favour, but ninety against, including one by Ellel Parish Council. Another objection was lodged by the then City councillor for Ellel Ward, who at the meeting of Lancaster City Council's Planning and Highways Regulatory Committee on 9 May 2018 also spoke against the proposal, as did members of the public in three-minute speeches. Very strikingly, the Council's own Air Quality Officer lodged objections. His 2010 report to Council on Galgate had stated that 'local emissions of nitrogen dioxides would need to be reduced by around 44% in order to meet ... Air Quality objectives'. The target figure is 40 micrograms per cubic metre. Seven years later in 2017 this officer reported that two air quality monitors on Main Road in Galgate gave figures of 50 and 70, and he concluded that 'it may still be many years before the Objectives are met'. Moreover, he did not accept that the 'mitigation' proposals for a bus layby nearby and plugs for electric cars at the proposed houses would be adequate solutions, and this was conceded by the Planning Officer at the hearing. The NPPF states that development can be refused 'where the residual cumulative impacts of the development are severe'. The Committee voted six in favour and six against, and there were abstentions. The chair of the Committee voted in favour. On that fragile basis the public is now being asked to consider and respond to a detailed Ward Field Farm development proposal.

2. Before considering the details, it is important to stress the current context in which any decision must now be made. Decision-making needs to take account of other proposals for housing and infrastructural development in the neighbourhood, in this instance South Lancaster. But we still do not know what are the Council's current proposals for what was once entitled 'Bailrigg Garden Village' and which has now been extended to become the 'Lancaster South Area Action Plan'. Therefore we cannot assess what the aggregate effect is likely to be of this 'Area Action Plan' - plus the housing projects in South Lancaster already underway, plus those now proposed by other developers. There is, in brief, no plan.

3. Understandably, developers are concerned only with their own proposals. It is possible that a single development (though not this one) might be acceptable, but cumulatively the impact of approving several schemes in this area is more than the sum of their parts. In addition to

(i) 68 houses now proposed for Ward Field Farm on the A6 leading to Main Road in Galgate are

(ii) 34 bungalows already being erected on Chapel Lane in Galgate,

(iii) and the transformation of Galgate mill into 107 apartments even closer to the centre of Galgate. Applications have also been submitted to build

(iv) 680 houses on land on North Bailrigg Lane adjacent to the motorway and Hala,

(v) and we know that developers will shortly submit plans for 140 houses at Pinewood Close, Scotforth, and

(vi) for 210 houses at Grab Lane, running between Wyresdale Road and Quernmore Road.

4. They amount to a total of 1239 units of accommodation. In aggregate and on reasonable expectations, these builds are likely to generate over 1800 additional motor vehicles on local roads. For the foreseeable future, very few of them will be powered by electric motors. Almost all of them will be driven up and down the A6 and along Main Road, Galgate, with many also adding to traffic flows through Hala, on Ashton Road and along the narrow and largely pavement-less Chapel Lane to and from Hazelrigg Lane and the University, all and certainly this last generating road safety issues.

5. This brings us to another changed context: climate change. Since outline planning permission was granted to the Ward Field Farm proposal there have been local elections. A coalition administration has been formed, and the Council in January 2019 declared there was a Climate Emergency to be addressed as a matter of urgency. Councillor Frea became the first member to be charged with addressing climate change issues. One would assume that it is his responsibility, amongst other matters, to check whether the environmental effects of developments improve our prospects, or at the very least and with future generations in mind that they are not likely to make matters worse. It is therefore reasonable to ask whether Councillor Frea has been consulted on housing schemes such as that which is here under consideration. Has he?

6. Certainly the Environment Agency has at last taken very seriously the implications of the November 2017 floods which devastated properties in Lancaster – and people's lives. In recent months on-site inspections have been taking place in Galgate. EA officers provided the Galgate Flood Group in November 2019 with a report on flood risk and on the measures needed to prevent a repetition of such devastation as had affected Galgate two years earlier. It is firmly stated that flood events are 'likely to increase in frequency and magnitude with climate change'. In its report there follow 26 options. These included what it judged were the unacceptable 'do nothing', 'do the minimum' and 'do the minimum plus'. Very clearly it is here stated that something must be done, and surely before developments potentially making matters worse are approved.

7. For a proper response to the threat, three options were recommended for dealing with the flooding caused by the River Conder. This is the main river coming down from the Bowland Fells. Turning south to Galgate, in heavy rain the Conder's capacity used to be

dispersed across flood plains, but in November 2017 the effects of climate change and housing developments led to ruined homes, businesses and lives on Main Road and Salford Road. It covered the site of Ward Field Farm, and, since then, heavy rain has again flooded the site.

8. The EA also recommended two and possibly three options for addressing the flooding caused by the Whitley Beck. This has frequently in the past burst over and turned Stoney Lane into a river. One major problem is that the M6 which marks the eastern edge of Galgate is the very old Lancaster by-pass (after the Preston by-pass the oldest in the country) built to early 1960s specifications. There are no measures in place to retain water run-off from its six carriageways, so in heavy rain it floods over into the local becks. The Whitley Beck then sweeps down Stoney Lane, and on Main Road and Salford Road it adds to the ruinous effect of floods on houses, businesses and people's lives.

9. The EA has also proposed a scheme with respect to the Oubeck, which flows from the east side of the A6, in fact between the current University campus and the under construction Health Innovation Campus. It (usually) crosses under (rather than over) the A6, then under the railway and then it runs along the edge of Galgate to the north and west. Here its water joins the Conder. But in wet weather its contribution causes a back-up of water up-river and worsens the flooding downstream as far as the River Lune.

10. It is repeatedly stated by developers that flood prevention measures will be put in place on green field sites, as in the Ward Field Farm case. However, SUDS schemes cannot cope with large flows of water and are even less than efficient when the tanks are not regularly cleared of detritus. (This was terribly revealed when Burrow Beck burst its banks in November 2017. Developers do not seem to be obliged to maintain what they have installed.) In preparing this housing scheme, on what basis was the capacity of the run-off storage tank calculated? If this was based on historical rainfall data from recent decades, this would clearly be inadequate given the impact of climate change - as we have witnessed to our cost in Galgate in recent years. If alternatively the calculations were made of the volume of water and rate of flow which occurred when two years ago the Conder burst its banks and flooded the Ward Field Farm site and adjacent properties, this would be a step in the right direction. But now, with that experience and climate change in mind, has the storage capacity of the SUDS scheme been calculated to cope with *more than* the volume of water which caused such devastation in November 2017? The proposal to install pumping stations on the development site exposes the fact that this is an unsafe site for development. Any water pumped out in a crisis would only add to the over-capacity in the Conder, pushing the problem downriver to another part of Galgate, on Salford Road. In sum, what is the data which explains why the developers believe that what they are proposing justifies house and road construction on a flood plain that floods? Until robust and far-sighted flood prevention measures are in place to mitigate existing known risks it is surely not wisdom to agree to additional house construction and associated road building which are likely to make matters significantly worse.

11. It is also essential to remember that the streets and houses on the several new estates which already surround the original core of the village of Galgate are connected to 19<sup>th</sup>-century sewers and drainage systems. Increasingly, because of these new builds and the flood impact of climate change, these elderly systems cannot cope. Additional

developments will worsen the problem. What flowed into people's homes during the November 2017 floods is indescribable.

12. We come now to a specific but intimately related objection to what is proposed. This has been provided by Lancashire County Council, and it too is on this planning application website. Lancaster County Council is responsible for the provision of school places across the county, and it has been confronted by 'significant increases in the birth rate at the same time as capital funding from the Department for Education has been significantly reduced'. Ellet St John Primary School is the primary school in Galgate. The most recent number of pupils on roll is 212. Its future planned maximum capacity up to January 2024 is actually lower, 210. In other words, no increase in capacity seems possible, as is indeed evident from an inspection of the site, which at the rear of the school and beyond a modest-sized playground slopes sharply uphill. Taking into account 'the latest available birth information' and 'evidence of migration', the projected pupil place demand by January 2024 is reckoned to be 231, in other words well above capacity. The construction of family homes close by on the Ward Field Farm site will only increase a local demand which cannot be satisfied. It follows that the excess numbers of children of primary school age, wherever in Galgate they live, will have to be educated elsewhere. The alternative nearest primary schools are north up the A6 into Lancaster and to the east in Quernmore and Dolphinholme. These two are inaccessible by public transport, and it is also unlikely that young children will be bussed into Lancaster. Inevitably, parents each morning and each afternoon will be taking and collecting them. This will add to traffic congestion, will worsen air quality, and will make harder the obligation to tackle climate change.

13. Moreover, any child resident on the Ward Field Farm site fortunate enough to gain a place at Ellet St John will have to cross from the west side of the A6 to get to school on the east. Currently there is on the west side no continuous footpath from the Ward Field Farm site to the existing footpath which runs from the last house on Main Road in the north to the crossroads in the middle of Galgate to the south. Even if one were constructed (and it would involve demolishing the historic wall of the stone bridge over the Conder), walking to the crossroads junction, then across the road, and then back north up Chapel Lane would be a long way round. Crossing the A6 nearer the Ward Field Farm site raises road safety issues. An option would be yet another set of traffic lights on the A6, closer to Ward Field Farm, with a traffic warden to ensure a safe crossing. However, this would exacerbate the air pollution consequences of stop-start road traffic.

14. The map accompanying the development plan also seems to allow residents on the Ward Field Farm site direct access to Salford Road. A path is to run south from the site via a footpath which exits alongside the railway viaduct over Salford Road. However, building 68 houses on the Ward Field Farm site will further strain the already overloaded local medical practice and pharmacy up Salford Road. Getting early appointments to see a doctor is already not easy, and one is often re-directed to other parts of the Rosebank practice, on the University site or in Lancaster. It is not even likely that residents on the site would walk to the surgery, and even less likely that they would walk or take a bus to the other locations. Hence more travelling by car. Once again the implications of what is proposed are serious, and they are not compatible with the Lancaster City Council's professed principles.

