

Complaint about South Lancaster Area Action Plan consultation

To Mr Mark Davies mdavies@lancaster.gov.uk

Lancaster City Council Chief Executive

Cc Gayle Rouncivell, Lancaster Guardian, gayle.rouncivell@jpimedia.co.uk

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Dear Mr Davies,

I am writing this complaint in exasperation after 6 years constructively responding to every other Local Plan and Bailrigg Garden Village consultation, speaking at Local Plan Hearings and helping others put together responses to consultations. I am a resident of Chapel Lane Galgate, and founder member of the campaign organisation CLOUD. We advised our members to engage with the South Lancaster Area Action Plan (SLAAP) consultation as soon as it was announced. Having done battle over Christmas with the 6 topic papers I feel a deep concern that the consultation is not fit for purpose because of the way it has been constructed and the time commitment required. This concern is set against a 6 year background of difficulties with the South Lancaster proposals.

My concerns relate to:

1. The onerous nature of the Planning consultation which is daunting and unclear in its purpose, at least to the layman, after years of unsatisfactory consultation on Bailrigg Garden Village
2. Secrecy surrounding the terms of Housing Infrastructure Fund (HIF) grant not mirrored by other Local Authorities.
3. No discussion or consultation on 9185 houses linked to the HIF bid - first announced in March 2020 Treasury Statement; no press release from either City and County, no discussion or explanation until August 2021 when dismissed by a senior Council officer as merely the 'business case' for HIF.
4. The contradictions between the South Lancaster Growth Policy and Lancaster City Council's declaration of a Climate Emergency
5. The financial risks

- 1. The onerous nature of the Planning consultation which is daunting and unclear in its purpose, at least to the layman, after years of unsatisfactory consultation on Bailrigg Garden Village**

In the winter of 2021 members of the public were so frustrated by the Bailrigg Garden Village Master Planning process that they launched a petition to Lancaster City Council which very quickly attracted 718 signatures

The petition was not about stopping Bailrigg Garden Village. Instead petitioners called for Councillors : to withdraw the consultation on Bailrigg Garden Village Masterplan currently being undertaken by JTP Architects and **to put in place a consultation process** which properly addresses the objections of local residents.

On 24 March 2021 the Full Council unanimously agreed **that the subsequent South Lancaster Area Action Plan should include structured questions and provide feedback to those registering comments/objections'**

Full details of the [petition and the speech are available here](#). This is a [report on the decision](#)

The current consultation does not address the essence of those concerns. The 6 topic papers alone amount to around 240 pages of jargon rich and often confusing description. Do the Planners genuinely believe that members of the public have the time to read and make sense of this volume of material before then completing detailed questionnaires for specific topic(s)? The 4 minute introductory video, whilst attractive, gives no real introduction to the topics or how to interpret them.

The public have certainly been provided with 'structured questions' in each of the questionnaires for the 6 topics. But the language of the texts is verbose and hard to engage with. The following is an example from the Transport section. It reads more like an unpunctuated examination question for someone doing a Master's Degree in Planning, than a request for views from local residents:

Question T2.1: Do you feel the evidential basis towards transport and highways described in this section represents a logical approach to the assessment of implications of proposed development within the 'Broad Location for Growth' and establishing the Council's ambitions around the delivery of modal shift? If not, please explain the rationale to your answer.

Over Christmas I received an email from a retired, senior professor asking what he was supposed to do with the SLAAP consultation which he found almost unintelligible, hardly a sign of consultation that was encouraging engagement . Set against a background of 6 years of 'consultations' where members of the public took the trouble to respond but were apparently not listened to, this is deeply frustrating - See Appendix 1 below - the Bailrigg Garden Village Consultation Timeline for details.

The objectives of the current exercise are not clear. At the 2019 Local Plan Hearings much was made of Bailrigg Garden Village being put aside for detailed discussion and shaping in the South Lancaster Area Action Plan. So everything from the Garden Village, to the Cycle Superhighway, to public transport plans, to the re configured Jt 33 was 'aspirational in 2019. 3 years down the line and much is still aspirational.

I was especially interested in the topic entitled Travel Transport and securing a modal shift.

Reading it I was reminded of a speech in the Local Plan Hearings of May 2019. It was given by a Parish Council Chair who was also a cyclist. He spoke of his enthusiasm for the idea of a 'Cycle Superhighway' but asked how were cars and cyclists going to be separated given the A6, through Scotforth, is lined by Victorian houses without parking, and asked which houses were going to be demolished. The reply from one of the Planners was 'It is aspirational'. The impression remains of aspiration rather than reality for the whole of the 40 pages about transport. In 2019 Highways England observed : ***“there is no robust transport evidence to demonstrate that these forms of sustainable transport infrastructure and services will provide the necessary modal shift to achieve the sustainable movement of people and goods, particularly in relation to the level of proposed growth in South Lancaster.”***

There are many words but few pieces of hard evidence to explain how and when this desirable shift will be achieved.

QUESTION How will this be funded given the HIF money was for road only (and then at 2019 prices before the current high rate of inflation) and included no funding for the cycle superhighway or bus rapid transit?

QUESTION

Could you let me know whether you agree that they are too verbose and lengthy for Lancaster residents to have any chance of understanding them?

QUESTION Is the issuing of topic papers suitable for public consultation on what the Council Leader has described as the most important decision facing the City in a generation. Should not the Council be arranging public meetings as with the Local Plan back in 2017?

2, Secrecy surrounding the Housing Infrastructure Fund (HIF) bid

The lack of consultation surrounding Bailrigg Garden Village is also reflected in the extreme secrecy surrounding the bid. This does not seem to be mirrored in nearby Carlisle, where there is also planned garden village and a HIF bid. There the [determination agreement with Homes England is publicly available](#). Clearly this is a decision made by both Cumbria County Council and Carlisle County Council.

QUESTION Why is documentation of this sort not readily available for the Lancashire/Lancaster Bid?

3, No prior discussion or consultation regarding the 9185 houses

Perhaps the biggest breach of public trust came in March 2020 when the following announcement appeared in the Treasury statement for the government's budget:

£140m from Housing Infrastructure Fund for South Lancaster Growth Catalyst which will unlock 9185 houses.

QUESTION Why was there no public consultation on this fundamental shift away from the Local Plan?

QUESTION Why was there no press release either by Lancaster City Council or Lancaster County Council in March 2020?

QUESTION Why did this only become openly discussed during the summer of 2021, shortly before the vote on the Collaboration Agreement between Lancaster City Council and Lancashire County Council?

4. **The contradictions between the South Lancaster Growth Policy and Lancaster City Council's declaration of a Climate Emergency**

A recent article in the iNewspaper on 27 December 2022 had the strapline **Campaigners say they fear councils are not taking their climate commitments seriously as many continue to support high carbon** - [Here is link](#). The article goes on to identify Lancaster as just one of those councils:

Lancaster City Council - Declared a climate emergency in 2019 and has a target for the council to become net zero by 2030. In 2021, the council approved a masterplan for 9,000 new homes south of the city. The project will involve a remodelling of the M6 and the building of new roads. Critics have said the development makes a "mockery" of the council's climate commitments and will lead to more cars on the road.

QUESTION How can the City Council justify this anomaly?

5. Financial Risks

Given exceptional and unpredicted inflationary pressures over the last year or so, with construction materials being particularly badly affected- with some estimates of rises of up to 27%, the financial risks seem exceptionally high.. The HIF bid depends on a roof tax to be paid by developers based on 9185 houses to cover the original £98M shortfall, a figure that has now risen substantially with inflation and continues to rise..

QUESTION How will rising Council tax or cuts to other developer obligations be avoided, at a time of inflationary pressure and financial difficulties for Councils?

I very much look forward to hearing from you.

Yours sincerely
Mary Breakell

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Appendix 1 Bailrigg Garden Village and Local Plan Consultation Timeline

Date	Type of consultation/event	Comments
2 January 2017	Announcement of government support for garden villages.	Most Lancaster people first heard of Bailrigg Garden Village when it was announced on the TV News on 2 January 2017 and report in the <i>Lancaster Guardian</i> 5 January 2017 . This included a sketchy map of a proposed 'Bailrigg Garden Village' which alarmed residents.
27 January - 24 March 2017	<p>Developing a Local Plan for Lancaster Consultation</p> <p>BGV was to be the centre-piece of the Local Plan. This development of some 3500 houses (though a Senior Planning Officer did subsequently refer to a potential 5000) Agri-business Centre, Health innovation Campus generating 2,000 jobs.</p>	<p>363 responses. Lancaster City Council Report of June 2017. Acknowledged that 'there remains : 1) A lack of confidence in the validity of and robustness of the objectively assessed housing need'</p> <p>2) A 'strong view...that the aspirations for economic growth in the district was [sic] overly optimistic'.</p> <p>3) A 'key concern' was also the 'delivery of infrastructure in terms of how it would be delivered and the costs', these matters relating to 'education, highways, healthcare, open space and other local service provision'.</p> <p>4) Noticeably 'a consistent response from the development industry suggested that the draft Local Plan places a heavy reliance on the delivery of strategic greenfield sites which require infrastructure (in particular Bailrigg Garden Village)'.</p> <p>5) Concern was also raised about the lack of detail about the proposed reconfiguration of junction 33 on the M6, and the cost.</p>
October 2017	Further Drop-Ins specifically relative to BGV. It was stated that these events were ' not directly part of the work taking place to bring forward the Local Plan ', but ' they do supplement the Local Plan process '. Indicative topics were advertised, such as managing drainage, housing density, employment, roads and traffic, schools and facilities, the cycle superhighway, bus rapid transit and - a curious one - 'The university in the village'. As far as we know, the university has no intention of opening facilities within BGV	Responses were invited, but those who attended the consultations reported that while questions could be asked little information on matters of key local concern was available. We are not aware of a report on that consultation.
20 December 2017	Local Plan approved by Lancaster City Council	At that meeting officers confirmed more work was needed on the Local Plan, implying that at that stage it was not 'sound'.

21 December 2017	Sent to all on consultation mailing list	List of major matters yet to be addressed: flood risk and ecology; engagement with the community, landowners and developers; work with the Lancashire County Council to plan community facilities, transport and infrastructure for the Garden Village; securing necessary funding. Among the items to be determined, it seems, was 'what land to allocate in South Lancaster, including for the Garden Village'.
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9 February - 6 April 2018	Local Plan published, including chapter 12 relating to BGV	Respondents were asked whether they judged it 'legally compliant' (a question hard to answer for lay people) and 'sound', and if judged unsound whether that was because it was 'not positively prepared', 'not justified', 'not effective', or 'not consistent with national policy'. CLOUD's response , submitted on 3 April, explained in detail why, in the opinion of its members, elements of the Local Plan were neither 'sound' nor 'evidence-based'.
15 May 2018	Lancaster City Council submitted the Lancaster District Local Plan for independent examination	
24 May 2018	Lancaster City Council invited consultees by email to comment specially and separately on a ' Bailrigg Garden Village Area Action Plan: Issues and Options Paper ' during June 2018	The setting up of the Area Action Plan for Bailrigg Garden Village confused consultees. It was the source of major concern from consultees - outlined above throughout the consultations, yet seemed to be being pulled out of the Local Plan.
19 September 2018	Work continuing on Local Plan	Renaming of Bailrigg Garden Village to South Lancaster Growth Catalyst
October-November 2018	Consultation on Modifications to Local Plan Proposed date for Hearings on Local Plan by Planning Inspector Richard McCoy expected 8 January 2018	The modifications to previous versions of the Plan were often considerable.
21 November 2018	Announcement that Hearings would not start on 8 January 2018	Correspondence between Planning Inspector and Lancaster City Council
7 January -15 February 2019	Consultation on Evidence and Additional Information	Announcement sent to Consultees with block of documents amounting to 2,000 pages. Summaries posted to consultees 17 January 2019
January-March 2021	Bailrigg Garden Village Masterplanning	Concerns over the rushed nature of this masterplanning exercise resulted in local residents raising a petition which attracted 718 signatures. Mrs Barbara Walker's speech to full Council showed how inadequate the consultation process was, especially when compared with those conducted for other

		garden villages. The City Council unanimously agreed. That the subsequent South Lancaster Area Action Plan should include structured questions and provide feedback to those registering comments/objections'.
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