



## LANCASTER LOCAL PLAN : RESPONSE TO CONSULTATION ON EVIDENCE & ADDITIONAL INFORMATION - 14 February 2019

This report explains the reasons why CLOUD's objections have been reinforced, rather than ameliorated, by the additional material now provided for consultation.

## INTRODUCTION

This is the response by the CLOUD organisation to the additional evidence and information published by Lancaster City Council in January 2019 in support of the Local Plan as submitted in May 2018.

CLOUD stands for **C**itizens of **L**ancaster **O**pposed to **U**necessary **D**evelopment. We have 215 members. The aim of CLOUD is to stop the proposed development of Bailrigg Garden Village 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 RESPONSE

Having carefully considered the evidence and additional information, we retain our view, expressed in April 2018, that crucial elements of the Local Plan are neither sound nor evidence-based. Some of our objections have been reinforced, rather than ameliorated, by the additional material now provided.

We are also concerned by what has been an increasingly confusing consultation process that has been extremely difficult for members of the public to engage with. **Appendix 1** provides a timeline of this consultation process. The modifications to the Local Plan, first proposed in October 2018 and then withdrawn, but only after CLOUD and local residents had gone to the trouble of responding, are a particular example.

We observe the following guidance from the government, but note that much of this evidence has been collected retrospectively :

*“The evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively”*. Government Local Plan Guidance Government guidance on Local Plan consultation etc

<https://www.gov.uk/guidance/plan-making#statutory-duty-and-the-role-of-plans> . We are using our summary of key soundness issues raised in April 2018 as the basis for response to the documents now under consultation. This summary is set out in text boxes (in blue) throughout this response.

### Document Em\_ep-03 Supporting Inclusive Economic Growth

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
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The evidence in this report from **Hall Aitken** assesses Lancaster’s ‘Inclusive Economic Growth’ and in so doing contradicts the findings laid out in the Local Plan and reinforces CLOUD’s objections of April 2018, that the Local Plan is unsound and not positively prepared regarding projected job numbers, demographic trends and housing need.

Referring back to **001 Strategic Policies and Land Allocation DPD**, Aitken and Hall’s report provides none of the evidence to justify the job projections with respect to South Lancaster including the University’s Health Innovation Campus ( Policy SG2: Lancaster University Health Innovation Campus p51), or the Canal Corridor (Policy SG5: Canal Corridor North, Central Lancaster p.58 ) and omits all mention of the Agri-business Centre( Policy EC3: Junction 33 Agri-Business Centre, South Galgate, p.98)’

We raised the issue of the University as follows in our response in April:

*“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 17 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."

The Hall Aitken report makes no mention of either the claimed 2,000 new jobs associated with the Health Innovation Campus (HIC) nor additional jobs at the University - both of which were cited in the Local Plan. Their overview of HIC instead emphasises the SME 'assists' that will be associated with its development. Critically the majority of these will not relate to digital technology,, but to management and organisational support to existing SMEs and, as such, unlikely to lead to these companies choosing to locate on campus. There is no mention of the University's growth aspirations which were mentioned in the Local Plan, presumably because they are nothing more than aspirations in an era of deep uncertainty in higher education.

The evidence in this report is in line with that obtained by CLOUD through Freedom of Information requests to the University which also confirmed that only Phase 1 of HIC was currently being built and was intended mainly to relocate staff from elsewhere on campus.

Crucially the Hall Aitken report states:

*"Lancaster University is a key provider of highly skilled employment opportunities. The Health Innovation Campus is one major initiative that could be a major contributor to the local economy that will also support skills retention. This is funded through ERDF and the LEP Growth Deal. It has targeted 300 SME outcomes. **Of these, 250 are management and organisational development and 50 are digital outcomes.**" (our emphasis).*

There is potential here for benefiting the local economy, but no statement that the SMEs will be based in Lancaster close to the University. Rather they are likely, as in the past, to be spread across the North West of England. The SME outcomes are primarily management and organisational, where Lancaster university has a strong reputation, but the experience of the last 15 years is that these do not typically lead to location on the University campus.

The evidence in this brief report confirms our view that the Local Plan is unsound. The evidence on jobs growth has not been positively prepared and the additional evidence conflicts with statements in the Local Plan relating to the impact on Lancaster employment from the Health Innovation Campus. This in turn has implications for the soundness of the funding bid made to the Housing Infrastructure Fund for South Lancaster Infrastructure.

### Ho\_HLM\_03.1to03.3 Housing Land Monitoring Report and Five Year Housing Land Supply Position

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
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Our view remains that the Local Plan significantly overstates Lancaster's housing needs and is therefore not justified, not consistent with national policy and not effective. In our response to the Local Plan in April 2018 we highlighted Para 9.19 therein. This sets out how the Council will seek to deliver just over 12,000 new dwellings over the period 2011/12 to 2033/34, 3 years post the official plan period of 2031/32 and equivalent to an annual requirement of 522 dwellings per annum. An additional 3 years has been included post adoption to ensure that the Plan meets the requirements to plan for a full 15 years following adoption. This means that in housing delivery terms the plan will cover a period of 23 years.

A new 'OAN Verification Study' (Turleys 2018) is now available to view from the following link <http://www.lancaster.gov.uk/planning/planning-policy/housing-reports-local-plan> ,but, while this makes some relatively modest changes to the OAN figures, it leaves the Local Plan essentially unchanged.

CLOUD has commissioned and received an independent analysis of the demographic trends behind the forecasts of Lancaster housing needs. This report has been prepared by Neil McDonald, an expert consultant on housing demographics. CLOUD wishes to have him speak on these issues at the Examination Hearings.

His conclusions are especially revealing of the flaws in the assessment of housing need set out in the Local Plan, which relies on the housing needs forecasts provided by Turleys for the Local Plan. Crucially Turley discounted the statistical relevance of UPC (Unattributable Population Change). This is especially relevant in Lancaster where a relatively high proportion of the population (10%) are students.

- i. *"A review of the detailed data on UPC and statistics from the university on the destinations of their alumni suggests strongly that there has been substantial underestimation of out-migration flows in student age groups. This could well have accounted for 100% of UPC and it appears to have continued after the 2001 census. This suggests that considerable weight should be given to the scenarios that take account of UPC.*
- ii. *As there are good reasons for believing that at least 50% and possibly as much as 100% of UPC is attributable to migration and analysis based on those assumptions produces result that are very similar to the numbers produced using the latest population estimates and projections it is reasonable to use the figures generated by the 50% and 100% assumptions as end-points for the range of demographic OAN estimate. This suggests that we should take **240-320 homes a year (2013-31) as the demographically-based estimate of the OAN** as this range also encapsulates the results based on the 2016 SNPP and 2017 MYEs. "*

In the document **5 Year Housing Land Supply Position**, the local housing need is assessed as just 131 houses per annum, as calculated using the currently approved methodology. We understand that this methodology may be subject to review and revision, but it must remain of great significance that the housing need could be as low as 131 dwellings per annum. This is so far removed from the target of 522 dwellings in the Local Plan as to render this figure unsound and to require a fundamental recalculation of housing need in Lancaster. It cannot be appropriate to over-allocate housing land to this degree - with too high a target, housing delivery will fall ever further behind target. This means that local authority planning becomes meaningless since developers will be able to pick and choose which schemes to proceed with.

We appreciate that central government calls for house building targets to be ambitious, but this cannot justify a roughly five-fold variation from the lowest to the highest figures we have been presented with. Referring to tables 1 and 2 in the Housing Land Monitoring Report, it is notable that dwelling completions have fallen short of the housing requirement over the whole period from 2003/04. From 2003/04 to 2010/11, the core housing strategy required 3,200 houses but only 2,219 were completed (69%). From 2011/12 to 2017/18 the emerging housing requirement is 3,654, but only 2,595 have been completed (71%). Despite these shortfalls, house prices in Lancaster remain among the lowest in England and the local housing market is far from buoyant.

As a result we confirm our view that the housing need statistics are not justified and we would add they are not positively prepared. We would also refer back to our concerns over jobs, especially in South Lancaster at Lancaster University, referred to above (Document Em\_ep-03 Supporting Inclusive Economic Growth). We note that Lancaster City Council's Annual Monitoring Report (November 2018) refers to 3.03% rate of growth in the Lancaster population over the period 2016 to 2041, compared to 12% for England as a whole. This 3.03% figure is lower than that resulting from Turley's report, due to the UPC issue identified above. We conclude, firstly, that this supports our case for a significant downward revision of housing need and, secondly, that the forecast of 9,500 new jobs in the Local Plan also needs to be

reassessed, since it is ultimately derived from the suspect Turley figures for population and household growth.

### En\_SFRA\_02 Level 2 Flood Risk Assessment

<p>Flooding - existing issues and impact of BGV. (see section IV part 3a below)</p>	<p>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.</p> <p>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.</p>	<p>Ch 10 (para 10.11). Para 12.26-32 re Health Innovation Campus</p>	<p>Not effective.  Not justified  Not consistent with national policy</p>
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This report provides a detailed assessment of the flood risk at 9 sites and assesses their suitability for development. The 9 sites are located at : Kingsway - White Lund - Mellishaw south & north - Caton Rd industrial estate - Glasson industrial estate - Imperial Way - Port of Heysham.

We note that neither Bailrigg Garden Village nor any of the areas affected by the severe flooding in November 2017 (Galgate, Halton etc) are covered in this report. Therefore our objections to the Local Plan remain - as detailed in section IV part 3b of our April 2018 response to the publication version of the Local Plan.

### VI\_03 Infrastructure Delivery Schedule

<p>Road Infrastructure (see section IV part 3b below)</p>	<p>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</p>	<p>Ch 12 - para 12.33 Infrastructure. 12.36-37 Details of infrastructure</p>	<p>Not Effective  Not Justified</p>
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In our April 2018 response to the Local Plan we commented on the exceptionally high road infrastructure cost associated with Bailrigg Garden Village (BGV).

Para 12.33 states : *“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.”* We expressed our concerns in the following terms in our comments in April 2018:

*“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.”*

## Costings

The Infrastructure Delivery Schedule does add some information in terms of the costs of adjustments to A6 Junctions. We commented in April 2018 that where 2016 estimates are used the lower end of the estimate range has been used and this remains unchanged. In addition costings for the Cycle SuperHighway and Bus Rapid Transit System remain outstanding.

## Funding

A key issue relates to funding from the Housing Infrastructure Fund (HIF) which covers much of the Infrastructure marked 'Critical'. Lancaster is one of 44 Shortlisted bids for this fund. The National Audit Office Report, Planning for New Homes published 08 February 2019 states in its summary p.10:

*In autumn 2018, the Department stated that 80% of the fund must go to the 50% of local authorities that have the least affordable houses compared with wages.* In addition housing developer funding will be needed to top up any HIF award.

The [Lloyds Bank Review of Affordable Homes](#), published in February 2018, places Lancaster 4th in terms of affordability with house prices 4.8 times earnings, compared with the national average of 7.0. This must increase the uncertainty of success in this bid.

There is also the question for South Lancaster of the jobs numbers used in relation to this bid and the discrepancy between those quoted in the Local Plan and those identified in **Em\_ep-03 Supporting Inclusive Economic growth** and discussed in (1) above.

This raises the question of the source for the figures for the jobs impact of the Health Innovation Campus used in the Housing Infrastructure Fund Bid?

Crossings of the Mainline Railway -which are critical for access to Bailrigg Garden Village were estimated as £22m in the [Lancashire County Transport Plan of December 2016 p. 54](#). This is a hidden cost on the current Infrastructure Delivery Schedule . There is simply the statement that 'Developers will need to ensure that the new development connects with the public highway' alongside the £5m allocated for connection to motorway junction.

## Cost per House

We raised the issue of the exceptionally high cost per house of road infrastructure in our April 2018 response as follows:

*"Assuming 3500 houses in Bailrigg Garden Village, the road infrastructure cost of between £87M and £127M represents a cost per house of between £24,857 and £36,285. "*

Other infrastructure costs for South Lancaster Development:

Primary School £3.6m - to be funded from development

Secondary School £24.5m - no funding agreed

## VI\_01 LP Viability Assessment Stage 1

The National Planning Policy Framework says:

*"that plans should be prepared positively in a way that is aspirational but deliverable. This means that policies should be realistic and the total cumulative cost of all relevant policies should not be of a scale that will make development unviable".*

The evidence above raises the question of viability given the developer contributions. The likely level of these would raise development costs and the purchase price of houses to prohibitive levels.

We note that the Viability Assessment reports were not completed until after the publication version of the Local Plan was put out to consultation in February 2018. The Viability Assessment Stage 1

report is dated April 2018, while the Stage 2 report is dated November 2018. The NPPF, as quoted in the Stage 1 report at para 2.3, requires careful attention to viability and costs in plan-making and we therefore query how the Local Plan can be described as sound when it was prepared before the viability report was available.

The conclusion of the viability assessment states (para 9.6) : “overall the viability modelling at this stage identifies a mixed picture of viability”. Other notable sections of the report include :

Para 2.26 quotes extensively from the National Planning Practice Guidance (NPPG), the report authors emphasising that careful attention should be paid to both deliverability and viability and that the plan should be realistic about what can be achieved and when, including infrastructure. NPPG also states that local planning authorities should publish documents that form part of the evidence base as they are completed. This was not done in the case of the Stage 1 report - dated April 2018 but not published until January 2019.

Para 3.4. Referring to the objectively assessed need for 13,000 to 14,000 new homes and the creation of 9,500 new jobs, the report describes this as *“a step change ...with levels of growth not previously seen in the district”*.

In conclusion this report does not alter our objections to the soundness of the publication version of the Local Plan.

#### VI\_01 LP Viability Assessment Stage 2

No comment. The 3 strategic sites covered in the Stage 2 assessment are outwith the objections we submitted to the Local Plan in April 2018.

#### Tr\_02 Transport Assessment Stage 1

Traffic and Transportation	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
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The Transport Assessment Stage 1 report acknowledges its limitations, especially the absence of an up-to-date Strategic Transport Model (described as a “major limitation” para 1.3.1), while para 1.3.5 states that *“additional transport-based evidence is being worked up for Bailrigg Garden Village through preparation of the Lancaster South Area Action Plan DPD”* - and is therefore not available now. These constraints mean that this report fails to address the traffic and transport issues on which we raised objections in our response to the publication and submission version of the Local Plan in April 2018. The parts of the Local Plan which we consider to lack soundness and our reasoning behind this are summarised in section III (Key Issues) of our response, with supporting detail in section IV, parts 3b and 3c. Therefore our objections to the Local Plan still stand and are not ameliorated by the Transport Assessment Stage 1 report.

Other parts of this report which point to its limitations include :

Para 5.1.2 City centre junctions excluded by LCC as reconfiguration is expected in the future through the Area Action Plan.

Para 7.3.12 The analysis does not take account of prospective schemes such as Bus Rapid Transit or M6 Junction 33 reconfiguration - both of which are described as essential for Bailrigg Garden Village in the Local Plan.

Para 8.1.22 The study is acknowledged to be adequate for 2023, but not beyond - and yet the Local Plan is meant to cover the period up to 2033/34.

**Tr\_03 Transport Assessment Stage 2**

The Transport Assessment Stage 2 report is subject to essentially the same criticism as the Stage 1 report above. For example para 1.2.1 : *“It is worth stating again that this study only provides a high-level generalised assessment of the potential impact of the emerging LP allocations on the highway network . The work has been undertaken without the benefit of an up-to-date Strategic Transport Model (STM) and without the precise nature of future development on the emerging LP allocation sites being known.”*

**AQ\_01 Air Quality Position Statement**

Air Quality	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
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This document describes the air quality regulations and then assesses the local air quality in Lancaster. The Bay Gateway has improved air quality in some areas, Caton Road for example. The position statement then goes onto describe how future vehicle emissions are likely to improve.

However, this air quality position statement does not constitute a full air quality assessment and this is what is needed to justify the developments proposed in the Local Plan. None of the improvements seen in air quality are a result of the council's own air quality action plan. Our previously expressed view on the air quality implications of the proposed Local Plan developments, especially in South Lancaster, is unchanged.

**Sr\_03 LCC Open Space Study**

This study and its recommendations to improve the quality etc of open spaces in Lancaster is to be welcomed. The study doesn't impact on the soundness issues which CLOUD raised in respect of the Local Plan.

Part 5 recommends improvements to low quality sites and proposes Community Infrastructure Levy (CIL) and Planning Conditions and Obligations (aka Section 106) as the mechanisms for securing developer contributions where future developments impact adversely on open space provision. CIL and Section 106 contributions are also expected to fund other elements of the Local Plan, such as infrastructure and affordable housing. It would be helpful to identify all such demands being made on developers to demonstrate the overall viability of the Plan.

**Sr\_04.1 and Sr\_04.2 Playing Pitch Assessment and Action Plan**

Same comment as on Sr\_03 above.

**En\_LA\_03 Landscape, Townscape & Visual Field Summary Report**

This is a comprehensive and detailed report. It doesn't however affect our objections to the soundness of the Local Plan.



#### **En\_LA\_04 Key Urban Landscape Review**

This review, issued to the Council in May 2018 but not published until January 2019, re-examines 19 Key Urban Landscapes (KUL) and evaluates 10 new sites.

2 of these sites appear to fall within the boundary of Bailrigg Garden Village - KUL no 16 (land to the west and south of Lancaster university) and new site AS-04 (land north of Galgate, Bailrigg). It isn't clear to us what the significance of this might be for the development of the garden village. Also, given that some KULs are described in the report as 'buffer sites', we wonder why such buffer zones have not been created to separate the garden village site from existing housing in south Lancaster - Scotforth and the Ashton road area.

#### **En\_LA\_05 Identified sites : landscape & visual assessments**

This report provides a high level assessment of 10 strategic sites identified by the Council, including Bailrigg Garden Village, for which the assessment is that the main site can be developed, but with constraints to preserve the landscape (eg Burrow Heights) and subject to mitigation measures. These constraints and mitigations can be expected both to add to development costs and also to reduce the capacity of the site to accommodate house developments. The report is dated July 2018 but was only published in January 2019.

This gives rise to 2 major objections :

- I. that the report should have been issued when received by the Council in July 2018 and not at this late stage.
- II. that the publication version of the Local Plan hasn't addressed the cost and capacity issues raised by this report in respect of Bailrigg Garden Village.

This reinforces our original objections to the soundness of the Local Plan.

#### **Other Documents**

The above comprises our comments on the documents provided by Lancaster City Council for consultation. Where documents are not cited above, this means we have no comment on them.

### **CONCLUSION**

**In June 2017, following the consultation in the winter of 2017, the City Council posted the following statement:**

**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'
- 2) A 'strong view...that the **aspirations for economic growth** in the district was [sic] overly optimistic'.
- 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'.
- 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)'.
- 5) Concern was also raised about the **lack of detail** about the proposed reconfiguration of junction 33 on the M6, and the cost.

This seems like a Local Plan set up to fail with too high housing need target alongside extremely high and largely unfunded infrastructure costs.

**Very little seems to have changed.**

## Appendix 1 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> <b>5 January 2017</b> . This included a sketchy map of a proposed 'Bailrigg Garden Village' which alarmed residents.
27 January - 24 March 2017	<a href="#">Developing a Local Plan for Lancaster Consultation</a> 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.	<b>363 responses.</b> Lancaster City Council Report of June 2017. Acknowledged that 'there remains : 1) A <b>lack of confidence</b> in the validity of and robustness of the objectively assessed housing need' 2) A 'strong view...that the <b>aspirations for economic growth</b> in the district was [sic] overly optimistic'. 3) A 'key concern' was also the 'delivery of infrastructure in terms of <b>how it would be delivered and the costs</b> ', these matters relating to 'education, highways, healthcare, open space and other local service provision'. 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)'. 5) Concern was also raised about the <b>lack of detail</b> about the proposed reconfiguration of junction 33 on the M6, and the cost.
October 2017	Further Drop-Ins specifically relative to BGV. It was stated that these events were ' <b>not directly part of the work taking place to bring forward the Local Plan</b> ', but ' <b>they do supplement the Local Plan process</b> '. 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'.

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'. <a href="#">CLOUD's response</a> , 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 ' <a href="#">Bailrigg Garden Village Area Action Plan; Issues and Options Paper</a> .' 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
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	<a href="#">Correspondence</a> 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. <a href="#">Summaries</a> posted to consultees 17 January 2019