

ITS OUR CITY
OPENING STATEMENT

Its Our City would like to begin this opening statement by saying a little about the history and nature of the group.

Its Our City came together as a group of local residents in December 2005 specifically in order to participate collectively and positively in the consultation exercise into the proposed redevelopment of the Canal Corridor North site.

A full and proper consultation process was promised by Centros Miller, as the applicant was then known. By the time the proposal to develop the site was widely known to local residents Centros Miller had already been given the status of 'preferred developer' by Lancaster city council.

The idea itself of developing the area concerned was greeted with general approval by local residents. As residents, we have never needed to be persuaded that this area needs to be developed. Many people were in fact excited by the prospect of participating in the development of ideas for the site.

Within weeks of first meeting Centros Miller's team in December 2005 it became clear that they did in fact have a predetermined plan for the site, that they had no intention

whatever of allowing anybody to impinge upon these plans and that they were in fact in league with the leadership of the city council and the planning department in attempting to foist these plans on the city.

Even so, Its Our City did not formally decide to publicly oppose the plans until it became clear in mid 2006 that the city council was going to sign up to a development agreement with Centros Miller, despite the concerns of many local residents. The city council was not about to delay its decision whilst those concerns were properly considered.

From that point in 2006 we have traveled a long way as a group of normal people.

Its Our City now has over 1000 electronic and postal subscribers in the local area and beyond. Many are local individuals. Some represent organisations and local businesses. The local and wider opposition to this scheme is very broad based indeed.

As an indication of the strength of local opposition to this scheme one could look at the number, scope and quality of the objections received by the city council in both 2007 and 2008 at the planning committee stage. However, perhaps the clearest indication of local opinion came at the local elections in 2007 when the leader of the city council lost his seat in Bulk ward as a result of his support for the scheme.

Its Our City is non-aligned politically and we have attempted to engage in dialogue with every political grouping on the city council and with other stake holder organisations in the city over the past few years.

Neither Its Our City, or anyone associated with it, is opposed to the redevelopment of the Canal Corridor North area. We have been clear throughout the past three years that our opposition to this proposed development is exactly that and nothing more.

To be clear we are opposed to this particular scheme in this particular place.

We believe that the body of evidence that we shall present to this inquiry forms a strong case against allowing this development to go forward. We believe that it represents the broad range of concerns and objections that local people have expressed. I now want to turn to that evidence in what remains of this opening submission.

CONSULTATION

Dr Jane Hunt will present evidence to show that the consultation carried out by Centros on its proposals was entirely inadequate. Public consultation and participation in decision making is increasingly a requirement throughout national and local Government, as evidenced by national and local policy, in particular PPS 1. **(CD48)** The consultation carried out in association with this planning application was deeply flawed, both in terms of stated policy and in relation to good practice.

Dr Hunt will show that the information presented by Centros was misleading and the results of the consultation were both poorly analysed and misrepresented. Further, that there has been a fundamental confusion between consultation, and publicity or PR on the part of Centros and Lancaster city council. This confusion continues as evidenced by Mr Cassidy's evidence on the consultations into the scheme. There has, in fact, not been a genuine consultation process in determining the elements of the development which is before this inquiry, but rather the imposition of predetermined plans. This, Dr Hunt will argue, has resulted in mistrust and alienation, rather than engagement and involvement, with the local community by the applicant.

TRANSPORT AND TRAFFIC IMPACT

Professor John Whitelegg and Mr W J Pye will present the traffic and transport element of the Its Our City case against the development. We will show that this scheme will inevitably lead to the generation of significant amounts of additional traffic in the city.

The proposal to build an 800 space multi-story car park, adding 500 car parking spaces to the 300 spaces currently available on the site, underlines this point. And on this point, it is hard to imagine a more significant departure from the government's transport and planning objectives expressed in PPG 13. (CD53)

A major concern for local people from the announcement of the proposed development up to the present has been centred on just how many extra cars a day, week or month the development will generate. This has been a question which the developer has consistently refused to address throughout the last three year period. It is similarly simply dismissed in the transport rebuttal standing in the name of the city council. We will of course address this issue in our evidence.

We will show in our evidence that the site is in fact poorly served by public transport and by walking routes that provide direct and comfortable connections to local

residential areas.

We will demonstrate that key elements of the Department for Transport's transport assessment procedures and requirements have been omitted from the proposals, including the prioritisation of walking and cycling measures, and a clear requirement to submit a proper travel plan with the planning applications.

We will highlight the importance of Lancaster's status as a Cycling Demonstration Town. The city is in receipt of £3 million of public money to facilitate an increase in cycling levels and much work has been done in this regard already. However, we will contrast the impetus of the improvements in cycling levels in the city with the damaging impact that this development will have on existing cycling links.

We contend that the development will cause increased rat running through residential areas in the Freehold area of the city. Further, that it will produce increased queue lengths at junctions and will cause additional general air pollution, produced by the increased traffic volumes, and a greater occurrence of standing traffic around the city road network.

The additional traffic which this development will generate will add significantly to the burden of greenhouse gases in the atmosphere with no recognition of the high level

significance attached by government to climate change policy as expressed in the Climate Change Act and in the Climate Change Supplement to PPS1. [CD48].

It is our contention that if the applicant and its supporters were open to the need to contribute to the government's targets of reducing CO2 emissions by 80% in 2050 and by 36% by 2020, a completely different proposal for the development of the Canal Corridor North site would have been forthcoming.

Such a proposal could have brought with it a significant improvement in the quality and the quantity of public transport and a balanced, highly integrated, plan for the site that would bring about significant and wide ranging improvements in walking and cycling throughout the city including routes from the railway and bus stations. A low carbon development is in our view both a requirement and a possibility and will certainly not be delivered by the proposals before this inquiry.

AIR QUALITY

Its Our City's evidence on air quality issues will be presented by Mr Jon Brooks. We contend that the evidence given in the Council's air quality proof makes many unsubstantiated claims. We will disprove many of the claims made therein and show that the air quality assessment is fundamentally flawed. That it fails to follow good practice and guidance. That it ignores policy guidance in PPS 23 in several ways and

that there has been no collaboration on the air quality impacts of the development with the Environment Agency as required by PPS 23.

The city council's proof implies that the air quality impacts from this development only have a 'potential' to work against the aims of future air quality action planning and then only to a small degree. However, the County Council are quite clear in their consultation response [I/AQ-06] that congestion levels will increase significantly with consequent queuing impacting on other corridors and junctions.

The city council knows that should the air quality predictions which support this development be proved to be incorrect after the development is in place, there will be nothing significant that they can do to redress the situation. This is clearly suggested by those parts of the Local Transport Plan [CD83] and the Lancaster Air Quality Action Plan [CD82] that discuss the effectiveness of specific actions to improve air quality.

RETAIL IMPACT

Its Our City's evidence on the retail impact of the scheme will be presented by Mr Tim Hamilton-Cox. Mr Dobson's proof of evidence is correct in one respect: all parties wish to see development of the Canal Corridor North area. All parties recognise that any development has to be both commercially viable, and be compliant with national, regional and local planning policy, taken as a whole.

Centros itself has insisted that this scheme is still commercially viable, whilst at the same time absenting itself from this inquiry, in order to save money, and when other developments in its own pipeline have either been cancelled (in Dumfries) or stalled (in Portsmouth)

It is a fact that the increases in purchasing power which have, in recent years, fueled the substantial year-on-year increases in comparison goods expenditure have come to an abrupt halt.

We submit that it is impossible to isolate the inquiry into this development from the real economy, particularly when maintaining the vitality and viability of the existing town centre is the fulcrum of retail planning policy.

In terms of planning policy, Mr Dobson maintains that the scheme is compliant when the development plan is 'taken as a whole'. We take the opposite view. We believe that the scheme is compliant with the direction of the Core Strategy, but that the retailing element of the Core Strategy has been made-to-measure in a development-led process timed to provide some degree of planning cover for the applicant's scheme, where the development brief for the site does not.

We will demonstrate the extent to which the scheme fails to comply with planning policy on all other counts. In any case the Canal Corridor North site is not yet allocated in the Local Development Framework. The Core Strategy could not, and did not, identify sites for development.

In particular, we believe that the scheme is not compliant with the PPS6 (CD50) requirement to maintain the viability and vitality of the existing city centre.

The latest quantitative need assessment from White Young Green is no more convincing than the previous four versions from both Centros and White Young Green itself, given the current economic backdrop.

We will demonstrate that the need assessment fails to justify the scale of retail floorspace proposed in this scheme. Whilst we accept that competition and enhanced consumer choice should be accepted as a principle, we believe that the negative impact of the proposed scale of retail expansion on the existing city centre, on other centres in the district, and on centres in South Lakeland, is not compatible with the government's 'town centres first' policy, or the broader aim of sustainable economic development.

I reiterate that our argument is not with the principle of retail expansion; it is with the

scale of this proposal on this location.

We have touched on the accessibility of the site as a whole for non-car modes of transport. We need to look as well at the accessibility of the scheme from the existing primary shopping area.

The proposed pedestrian bridge over the A6 at Stonewell would be the one point of connectivity between the existing city centre and this proposed edge-of-centre development. Irrespective of the negative aesthetic implications of the bridge on the townscape, we are concerned about its deliverability within the context of the Centros unilateral section 106 document.

There is no guarantee that the third party will provide the right of access into St. Nicholas Arcade. Argos has complained vociferously about the loss of its store. There is no guarantee that the link can be delivered for the cost capped in the unilateral section 106.

Centros has recent form in the non-delivery of improved access promised in a planning agreement in Bury St. Edmunds, where its retail scheme there opened earlier this year. And with caps on the costs of other aspects of the scheme as detailed, it is not difficult to anticipate the public purse being required to make up the shortfalls.

TOURISM

It's Our City welcomes the opportunity to present evidence about tourism to this Inquiry which will be presented by Professor John Walton.

Tourism is extremely important to Lancaster economically, attracting over two million visitor days per annum, with a spend of over £84 million in 2007 and employing over 1,000 full time equivalent employees. (I/T-02)

Its visitors tend to be independent tourists, seeking distinctive places and individual experiences and Lancaster's Tourism Vision deliberately targets these high-spending tourist segments. (CD99) Their preferences are known to be independent shops, cafés, restaurants and an historic ambiance rather than chain and branded outlets or modern developments. (IT-05)

It's Our City considers that the proposed development threatens Lancaster's tourist revenue in a number of ways.

Demolishing historic buildings would reduce Lancaster's historic assets and heritage forever. Putting modern development in their place breaks up the historic backdrop for

people visiting conservation areas and tourist sites.

The view from key tourist sites such as the Castle and Williamson's Park will also be disrupted and views are known to be a key factor in visitor satisfaction with heritage destinations. (I/T-12)

One of the problems for tourism development has been identified as the severance caused by traffic on the A6, preventing people reaching the city centre. (I/T-06) This can only be worsened by the new shopping centre.

Independent and distinctive traders are known to be major attractors of tourists and their spending. Chester, York and Cambridge have been successful in preserving their historic ambience and accommodating diverse traders in historic buildings, being careful that new developments do not spoil that ambience. Building a new shopping centre on the edge of the existing centre threatens the existing traders in the historic city centre and will reduce the tourism offering closest to the Historic Quarter. Small businesses are particularly important for tourism and are efficient at 'recycling revenue' back into the local economy. (I/T-16)

As well as undermining the assets on which the tourism economy depends, the new development will destroy existing street patterns and familiar landmark buildings.

This is recognised to reduce residents' sense of belonging and pride of place.

Evidence from around the world demonstrates how purpose-built retailing spaces revert to 'sameness', exclude certain types of people and activities and are less flexible to changing circumstances. (I/T-29)

CONCLUSION

We believe that the applicant in this case has not proved the case for this development in any respect over the past years. We maintain that this development fails the demands of planning policy on many grounds. It does so particularly in the areas that we have concentrated on in our evidence.

Finally, we wish to point out that we have long awaited this public inquiry which for some time we have assumed would be the ultimate outcome of the Centros proposals. As local residents, without resources and without recourse to expensive professional legal representation, we have prepared for this inquiry to the best of our ability.

This said, we would rather that this development had not reached this stage. This issue has taken an untold amount of time out of our otherwise normal lives over years now.

None of those who will appear for Its Our City at this inquiry will be doing so for payment. Their time and effort is given for free. Their motivation is a genuine love of this city in all its colour and diversity and the considered opinion that this development is fundamentally wrong in every respect for this city. We trust that in the course of this inquiry our objections to this scheme, which match those of many local people, and our evidence will at last be given the time, the consideration and the respect that we believe they deserve.