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From: Anthony Blendall

Sent: 18 April 2019 14:52

To: programmeofficer <programmeofficer@lancaster.gov.uk>

Subject: CONFLICT OF INTEREST, TURLEY'S

> Dear Kim,

> I am a resident of south Lancaster and last year submitted formal written representations on the draft local plan to the city council to be forwarded to the Inspector. I have attended the Inspector's hearings at Morecambe Town Hall and the Storey Institute.

> I was surprised and concerned to learn that the professional practice of Turley's have worked for, advised and represented Peel Investments as well as working for and advising the city council. In the latter case they assumed part responsibility for calculating the Objective Housing Need which fed into the draft local plan but also advised Peel Investments with a view to challenging parts of the draft plan in respect of the Objective Housing Need or in respect of its effects or details. It appears to me that Turley's have been playing the roles of both poacher and gamekeeper and that they have created a conflict of interest. They are, of course, a reputable and professional firm, but I do feel that this represents a lapse on their part. I must assume that both the council and Peel are content if there is a conflict of interest, as I cannot see that they have voiced objection, but the point is that the fair and democratic process of examination of the draft plan, its potential amendment by the Inspector and its potential approval by the Inspector is adversely influenced and affected by what I believe to be a conflict of interest.

> In the event of such conflict I suggest that the remedy is for one of the parties to withdraw and delete all information, evidence and submissions derived from or influenced by Turley's, for Turley's to withdraw from representing that party and for that party to disinstruct them. It is not for me to suggest which party. If Peel, they would need to delete and amend parts of their oral and written submissions made before and during the public examination; if the council, it would need to amend its draft plan and supporting submissions by deleting all parts referring to, affected by and deriving from the Objective Housing Need they had adopted and, presumably, substituting the deletions with new suggested facts and figures derived from advice from a new professional planning consultant. Onerous, I accept, but conflict of interest is always a serious matter, and in this case affects crucial aspects at the heart of the draft plan.

> I am also concerned that conflict of interest may taint the Statement Of Common Ground to which both the council and Peel are signatories, and appears to have been drafted all or in part by Turley's. It is important to consider what was Turley's role in the drafting of this Statement and the potential for further conflict of interest in view of the differing advice they have given to the council on the one hand and Peel on the other.

> I shall be grateful if you will forward this email to the Inspector in order that he might consider it before hearings recommence on 24th April, and I should very much like to hear his acknowledgment of it and his view on the point of potential conflict, at the reconvened hearings.

> Thank you very much for your time and in anticipation of your kind assistance in placing this before the Inspector.

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> Yours sincerely,

> A J Blendall TD MRICS