



Morecambe Town Council
Morecambe Town Hall
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Morecambe
LA4 5AF.

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Our Ref:
Your Ref: 17/00534/FUL

Mr A. Dobson,
Head of Regeneration and Policy,
Lancaster City Council,
Town Hall
Morecambe,
LA4 5AF

21st June, 2017

Dear Mr Dobson,

Re: Planning Application No. 17/00534/FUL- Demolition of existing supermarket, bowling alley and retail units and erection of a replacement supermarket with associated car parking and hard and soft landscaping.

The Town Council considered the above application at its Planning Development and Environment Committee on 12th June and is of the opinion that the application:

1. Will contribute no improvement to Morecambe's economy.
2. Will result in the loss of not only the Bowling Alley but, more importantly, the current leisure opportunity which the site affords.
3. By increasing the size of the car park will lead to increased trade diversion from the town centre.
4. Is at variance with local plans and aspirations in a significant number of ways.

In arriving at this view Morecambe Town Council has examined the documents supporting the application and the relevant Local Plan policies. The Town Council has carefully considered the dilemma of the current owners of the Bowling Alley and the fears of the current tenants of the Arcade and the remainder of the building.

This application will increase the size of the foodstore by about 50% with a similar increase in the size of the car park. There can only be two additional economic benefits arising from the rebuilding of a foodstore. These might be

1. If the new Store represents a substantial increase in the town's offer which will not be the case here because the increased size of the store will still be a relatively small percentage in the retail offer in that part of the town
2. If the development brings with it substantial employment opportunities. Not surprisingly no such claims are made in this application. The only economic benefit to the town arises from the wages earned by the employees. all other income is exported from Morecambe for the benefit of Aldi and its shareholders.

The closure of the bowling alley will result in a contraction in the town's economy through the loss of jobs. If the land is then permanently lost to leisure use, that contraction in the economy will be permanent. If the application is refused then either the building or the land can at some future date be used for leisure and the economy expanded through additional jobs at some future attraction which, in itself, will also attract more visitors to Morecambe with a concomitant, beneficial, effect on the economy.

The application states that there is no local policy relating to the safeguarding of leisure but leisure facilities contribute substantially to tourism and tourism is protected by local policy which cites tourism as the principle regenerator of Morecambe's economy.

In conclusion Aldi and the owners of the Bowling Alley appear to be the only beneficiaries from this application. There will be no significant positive effect on the economy and there is likely to be an adverse effect on the Town Centre. The likely loss of a current leisure attraction will also mean the loss of a site which could at some future time be redeveloped for leisure use thus making it more difficult to achieve the City Council's aim of regeneration through tourism.

It is the view of the Morecambe Town Council that the application be refused and attached at Appendix 1 to this letter is the Council's detailed analysis of this application and relevant planning policy documents that informed the above objection. The Appendix sets out in more detail the Town Council's reasons for objecting to this application.

I trust these comments will be considered by the City Council's Planning Committee in due course.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'David Croxall', written in a cursive style.

David Croxall
Town Clerk

Appendix 1: Re: Planning Application No. 17/00534/FUL- Demolition of existing supermarket, bowling alley and retail units and erection of a replacement supermarket with associated car parking and hard and soft landscaping.

DETAILED RESPONSE TO THE PLANNING, RETAIL AND HERITAGE STATEMENT

The statement is systematically reviewed section by section. Only those sections and paragraphs of concern to the Morecambe Town Council are cited and the Town Council's comments follow each citation in italics.

INTRODUCTION

Para 1.3 states that the principle of convenience development is established by the presence of the current store.

Insofar as this statement has relevance to the application, the same can be said for the principle of leisure by the presence of the Bowling Alley.

SITE DESCRIPTION

Para 2.3 refers to the site as "well-connected".

It is well established that there is little footfall between the site and the Town Centre. Improving that connection has long been an, as yet, unachieved aspiration of the City Council which is further confirmed by the appointment of Morecambe as a Portas Town following an application to remedy that very situation.

ALDI STORE AND MODEL INFORMATION

The Town Council has no significant comment to make on these sections.

PLANNING POLICY CONTEXT

Several aspects of existing policy are referred to in this section and since the appraisal which follows in the next section attempts to put the application into the context of planning policy, the Morecambe Town Council (MTC) will respond in detail in that section. However there are some policy references in this section which are worthy of comment.

Para 5.7 stresses the importance of tourism to the local economy and, that tourism and regeneration must be safeguarded. *Morecambe Town Council (MTC) for reasons set out in its response to the appraisal believes that the application is inimical to both aims.*

Para 5.10 refers to Morecambe Town Centre. *MTC. points out that the proposed development is outside the Town Centre defined by the Morecambe Area Action Plan.*

Para 5.11 refers to the need to focus retail development on regenerating and reinforcing the vitality and viability of Town Centres. *MTC. does not believe the proposed development will be in accord with this principle.*

Para 5.40 The policy referred to here requires a much improved offer through both retail and **leisure** uses. *MTC.. does not perceive a much improved retail offer and it is clear that the leisure offer will be permanently attenuated.*

Para 5.41 This policy prioritises Morecambe as a regeneration area and tourism as the means of that regeneration. *MTC. feels that this application is in direct contravention of this policy.*

DEVELOPMENT APPRAISAL

This section of the applicant's supporting document seeks to show that the development will contribute to economic growth. We will examine that claim which we believe cannot be justified.

Para 6.3 quotes the National Planning Policy Framework (NPPF) citing the instruction to place "significant weight on the need to support economic growth."

Morecambe Town Council feels that this application will not contribute to economic growth, indeed that the reverse could be true. National retailers only encourage economic growth in two ways.

1. If additional customers are attracted to the town and stay to spend money locally.

The document clearly states that the replacement store is a convenience store and as such will attract no additional tourists to the town.

2. If there are additional jobs created by the development.

It is notable that no claims of additional employment are made in the supporting documentation.

Economic growth must result in more spending power in the community. There will no increase in spending power, hence no economic growth resulting from the proposed development. Para 19 of the NPPF is not relevant.

SITE AND LOCATION

Paras 6.4 and 6.5 also elicit support because of purported economic growth.

Morecambe Town Council has shown there will be no economic growth and so the claims made in these paragraphs are not relevant.

ECONOMIC SUSTAINABILITY

Paras 6.7 through to 6.10 seek to define the current use as leisure. Paras 6.11 to 6.14 seek to show that leisure uses are not protected by local policies ER5 of the core strategy and DM 12 of the Development Management DPD.

However, the saved local plan, under the heading Tourism, sub-heading "Tourism in the local Economy" confirms tourism as a major sector in the local economy. Para 3.6.4 of the same document further states "that existing tourist attractions must be safeguarded and that the regeneration of Morecambe must be continued."

It is clear that the Bowling Alley is a tourism attraction and, as such, is safeguarded by Para 3.6.4 of the saved local plan.

IMPACT ON MORECAMBE TOWN CENTRE

Paras 6.15 to 6.17 set out to show that the proposed development will be in accordance with City Council Policies.

The policies chosen are highly selective and there are others which do not support the development. For example the observation that the proposed development is defined by the NPPF as a main Town Centre use is rendered not relevant by the Morecambe Area Action Plan (MAAP) which clearly places the site outside the defined Town Centre so the NPPF definition is not relevant.

Para 6.16 states "the loss of the leisure use will be compensated for by improvement to the qualitative provision of convenience goods. This is a highly subjective claim which does not compare like with like and which is not borne out by the many letters of objection which have been received.

In Para 6.17 the applicants again refer to accordance with the NPPF which states the need to "promote competitive town centre environments." This proposal will not contribute to such a policy and if anything could damage the town centre through trade diversion. This application is clearly in conflict with the NPPF.

OPERATOR INTENT TO CLOSE

Paras 6.18 and 6.19 refer

This is not relevant to consideration of the application. The Planning Authority may only take account of those matters which are set out in policy documents and the NPPF. As such the City Council's policies overwhelmingly commit the City Council to the protection of tourism and economic growth, neither of which are to be found in this development.

REPLACEMENT FOODSTORE and EMPLOYMENT

These two sections are taken together. Paras 6.20 to 6.23 apply.

This section promotes the new store as a benefit to the community which will strengthen the vitality and viability of the town centre. Morecambe Town Council is of the view that there will be no benefit to the Town Centre.

The reference to retention of greater expenditure from local residents is applied to those who currently do main shopping elsewhere. The new shop will still be modest in size so it follows that the increase in trade at the rebuilt Aldi will be as a result of trade diversion from other stores and that will include Town Centre shops. The Town Centre is likely to be weakened if this application is approved.

There are references to levels of employment but these are unlikely to change and since the application makes no claims of increased employment we can reasonably infer that employment levels will not be increase. However, the loss of the Bowling Alley will result in the loss of jobs and the loss of the leisure site will mean that those jobs can never return!

BIODIVERSITY

This section is noteworthy because of the rather startling claim that the resultant development will result in a reduction in the overall number of visitor trips to the site which does not seem to accord with the claims for economic growth made earlier.

TRANSPORT

The increased size of the car park clearly indicates an expectation of an increase in vehicular traffic. The current traffic arrangements are far from satisfactory and often lead to queues of traffic back to the Central Drive roundabout. Increased traffic flows can only exacerbate the current situation.

CONCLUSION

The summary at the beginning of this response is comprehensive and requires no further comment. However, the Morecambe Town Council confirms here that it is committed to working with the whole community both private and commercial and as such will seek to engage with all those affected by this application to achieve a satisfactory outcome.

The closure of the bowling alley will result in a contraction in the town's economy through the loss of jobs. If the land is then permanently lost to leisure use, then that contraction in the economy will be permanent. If the application is refused then either the building or the land can at some future date be used for leisure and the economy expanded through additional jobs at some future attraction which, in itself, will also attract more visitors with a concomitant, beneficial, effect on the economy.

The application states that there is no local policy relating to the safeguarding of leisure but leisure facilities contribute substantially to tourism and tourism is protected by local policy which cites tourism as the principle regenerator of Morecambe's economy.

In conclusion Aldi and the owners of the Bowling Alley appear to be the only beneficiaries from this application. There will be no significant positive effect on the economy and there is likely to be an adverse effect on the Town Centre. The likely loss of a current leisure attraction will also mean the loss of a site which could at some future time be redeveloped for leisure use thus making it more difficult to achieve the City Council's aim of regeneration through tourism.

It is the view of the Morecambe Town Council that the application be refused.