



Morecambe Town Council

Agenda Confidential Morecambe Town Council Full Meeting

Date 19/06/2025
Time 19:00 - 21:00
Location Morecambe Town Hall, Marine Road Morecambe Lancashire LA4 5AF
Chair Clark Kent
Explanation Dear Councillor,

Dated this **12th** day of June **2025**, you are hereby summoned to attend a meeting of Morecambe Town Council to be held at **19:00** on the **19** day of June 2025.

The meeting will be held in Morecambe Town Hall, Marine Road East, Morecambe, LA4 5AF to transact business on the agenda.

Note to Councillors:

If you are unable to attend the meeting, please notify the Proper Officer of your apologies.

Note to Public:

Electors of the town wishing to address the Council are advised to notify the Proper Officer before 10am on the day of the meeting. Permission to speak at the meeting will be at the discretion of the Chairman. Public participation session at a meeting shall not require response or debate and shall solely consist of matters relating to items on the agenda. If the representation made is considered outside the remit of Morecambe Town Council, electors will be referred to the principal authority or other appropriate body.

Yours sincerely,
Mr L Trevaskis, CiLCA, PSLCC.
Chief Executive

1 Apologies

To receive apologies for absence and consider any reasons for acceptance.

([Local Government Act 1972, Section 85](#))

2 Declarations

To record any declared interests relating to the business of the meeting and receive any dispensation requests from the Proper Officer.

([Localism Act 2011, Section 31](#))

3 Minutes

To approve the minutes of the last meeting.

([Local Government Act 1972, Section 111](#))

4 Public Participation

To receive representations from electors that have requested to speak by 10am regarding a matter on the agenda.

([Morecambe Town Council Standing Orders - Sections 1d-1l](#))

Note: any electors addressing the Council must not exceed a three minute time limit.

**5 Annual Governance and Accountability Return 2024 - 2025
(Accounts and Audit Regulations 2015)**

To consider and accept the following for submission to the External Auditor by the end of June 2025:

- Section 1 and Section 2 of the Annual Governance and Accountability Return 2024 - 2025
- End of Financial Year 2024/25 Budget Summary Report
- End of Financial Year 2024/25 Bank Reconciliation

6 Internal Audit Report 2024 - 2025

To consider and accept the 2024 - 2025 Internal Audit Report provided by Heelis & Lodge.

7 Armed Forces Covenant

To consider the report and resolve the recommendations contained therein, to:

- Sign the Armed Forces Covenant, incorporating the pledges as listed.
- Submit an application for Bronze award in the associated Employer Recognition Scheme.

- Instruct Officers to work with the Armed Forces Champion and Councillors to begin building a body of evidence in support of future submission for Silver and Gold awards.

8 **Complaints Policy**

To review and adopt the proposed Complaints Policy.

9 **Equality and Human Rights Commission Consultation**

Following the motion passed by this Council at its meeting held on 15th May (Minute 2025-26 - 010) to support the trans community following the Supreme Court ruling on the Equality Act.

This Council notes that the Equality and Human Rights Commission (EHRC) previously conducted a public consultation on its *Code of Practice for Services, Public Functions and Associations* between 2 October 2024 and 3 January 2025 - a period of 13 weeks.

It is further noted that significant amendments to the Code were made following the UK Supreme Court judgment issued on 16 April 2025, yet no public consultation preceded the implementation of these changes.

Subsequently, a limited 2-week consultation period opened on 20 May 2025 to seek feedback on these newly introduced changes. While this has now been extended to 30 June 2025, providing a total of 6 weeks, this remains substantially shorter than the previous consultation and does not afford sufficient time for many public bodies and civil society organisations to fully scrutinise and respond to the revised content.

This motion therefore proposes that Morecambe Town Council:

1. Delegates authority to the Proper Officer, working in collaboration with the Council's Diversity, Equality and Inclusion (DEI) Champion, to prepare and submit formal representations to the EHRC on behalf of the Council as below.
2. To expresses concern regarding:
 - The speed and lack of transparency with which the EHRC implemented significant changes to the Code, bypassing appropriate public and stakeholder consultation.

- The disproportionately shorter consultation period afforded to organisations responding to these revisions, compared to the 13-week process undertaken for the original Code.
3. Puts forward requests for clarification and raises concern that the revised Code contains a number of sections that appear ambiguous, insufficiently explained, unclear, or open to misinterpretation, particularly in relation to the legal rights and responsibilities of service providers and public bodies, and how we should practically implement these. These include but are not limited to:
- The updated legal definition of sex;
 - The explanation and implications of the updated legal definition of sex;
 - The content on Gender Recognition Certificates;
 - The guidance on asking or recording sex at birth;
 - The guidance on defining sex at birth;
 - The updated explanation of the protected characteristic of sexual orientation;
 - The new example on sex discrimination by perception;
 - The updated example on harassment related to sex;
 - The revised section on the provision of separate and single-sex services.
4. This motion also asks that the Proper Officer and DEI Champion:
- Review the revisions to the Code in full, and
 - Bring back to a future Council meeting a set of recommendations on how the Council should interpret or apply the updated guidance in its own activities, including policy-making, service delivery, event planning, and internal operations.

This is to ensure that the Council maintains legal compliance while also upholding its ongoing commitment to inclusion, respect for diversity, and the fair treatment of all individuals in the community.

Proposed: Cllr David Whitaker

Seconded: Cllr Joanne Ainscough

The Impact of Information Requests on Council Resources and Service Delivery

The Council remains fully committed to transparency and upholding its legal obligations under the Freedom of Information Act (FOIA) and the General Data Protection Regulation (GDPR), including responding

to Subject Access Requests (SARs) and cooperating with the Information Commissioner's Office (ICO) where appropriate. We take these responsibilities seriously and have recently received confirmation from the ICO that our data management practices are in line with current regulatory expectations.

However, it is important to highlight that sometimes the volume and/or complexity of requests - particularly FOIs and SARs - continue to place a significant strain on the Council's limited resources. Many of these requests result in no further action being taken, despite the considerable time and administrative effort required to process them.

While we respect the public's right to request information, it is worth reflecting on the broader impact these processes have on the delivery of day-to-day services that directly benefit our communities.

In recent weeks, the increasing burden of handling such requests has begun to disrupt normal service delivery. For example, the Neighbourhood Plan meeting - an important step in shaping the future of our community - had to be cancelled due to resource reallocation toward compliance with statutory information requests. Delays to planned operations such as this can have wider, knock-on effects for community-led development and local initiatives.

Additionally, recent activity by third parties - some of whom appear to be acting in breach of data protection law and infringing upon the rights of individuals - has further compounded the situation. Council officers are now frequently required to spend substantial time investigating and correcting issues caused by external actions, diverting attention from proactive service delivery and community support.

This escalation in demand has led to unavoidable cost implications. In some cases, the scale of administrative work involved may necessitate the hiring of temporary staff to fulfil statutory obligations, incurring additional unplanned expenditure from the public purse. These processes can take several weeks, during which time other priority work may be delayed.

We therefore respectfully ask members of the public and interested parties to consider, wherever possible, whether informal routes of enquiry or engagement might achieve the same outcome before submitting formal FOI or SAR requests. This not only helps ensure that Council resources remain focused on essential services, but also

supports a more efficient and collaborative relationship between the Council and the communities it serves.

We also thank residents and members for their patience while the Council works through the backlog.

11

Planning Application 23/01384/OUT

To note that amended plans for the development of LAND AT POWDER HOUSE LANE, TORRISHOLME, have been submitted to Lancaster City Council.

The Town Council previously objected the development of this land in 2024 (attached).

To consider whether to submit a further objection in light of the revised plans.

12

Local Government Reorganisation Working Group

The Council is invited to establish a cross-party Local Government Reorganisation (LGR) Working Group, comprising elected members from all political affiliations. The purpose of this group will be to work collaboratively with officers to maintain strategic momentum on matters relating to local government reorganisation. The Working Group will help move the Council's position forward, ensure continuity of focus during the summer period, and provide political oversight and input into emerging proposals, engagement with key stakeholders, and any preparatory actions required in advance of potential structural changes.



Morecambe Town Council

Morecambe Town Hall,
Marine Road
Morecambe
Lancashire
LA4 5AF

www.morecambe.gov.uk

Members of Morecambe Town Council

Cllr R Walsh - Chairman (Outgoing)
Cllr G Knight - Vice Chairman (Outgoing)

Cllr C Ainscough, Cllr J Ainscough, Cllr D Blacow, Cllr D Bottoms, Cllr L Bradbury, Cllr P Clarke, Cllr F Cooper, Cllr C Cozler, Cllr R Dennison, Cllr W Dixon, Cllr K Gee, Cllr P Hart, Cllr J Goodrich, Cllr J Hanson, Cllr C Kent, Cllr D Knight, Cllr J Livermore, Cllr M Pattison, Cllr J Pilling, Cllr J Rogerson, Cllr J Slater, Cllr M Stenneken, Cllr D Whitaker, Cllr John Bates.

Minutes of Morecambe Town Council's Annual Full Council Meeting held at 7pm on the 15 May 2025 at Morecambe Town Hall, Marine Road, Morecambe, LA4 5AF.

Record of Attendance:

Councillors: Russell Walsh (Chairman), Geoff Knight (Vice Chairman), Lee Bradbury, Faye Cooper, Dan Blacow, Debbie Knight, Clark Kent, Jackie Rogerson, Keri Gee, Martin Bottoms, Margaret Pattison, John Goodrich, John Hanson, Christian Ainscough, Joanne Ainscough, David Whitaker, John Livermore, John Bates, Jim Pilling, Roger Dennison.

Officers: Luke Trevaskis, Peter Fisher, Joel Turner, Luke Agnew.

Press: None.

Public: 2

Minute 2025/26 - 001 - Election of Chairman

Nominations were received for Cllr Clark Kent and Cllr Joanne Ainscough.

Cllr Clark Kent was duly elected to the office of Chairman of Morecambe Town Council and read the following declaration:

"I, Cllr Clark Kent, having been elected to the office of Chairman of Morecambe Town Council declare that I take that office upon myself and will duly and faithfully fulfil the duties of it according to the best of my judgement and ability. I undertake to observe the code of conduct which is expected of members of Morecambe Town Council."

Cllr Clark Kent thanked Cllr Russell Walsh for his sage chairmanship during the previous twelve months. Congratulations were also passed to Cllr Margaret Pattison on becoming the Mayor of Lancaster, and Cllr John Hanson for becoming the Deputy Mayor.

(Cllr Keri Gee arrived to the meeting.)

Minute 2025/26 - 002 - Election of Vice Chairman

Nominations were received for Cllr Lee Bradbury and Cllr Joanne Ainscough.

Cllr Lee Bradbury was duly elected to the office of Vice Chairman of Morecambe Town Council. Cllr Bradbury will sign his declaration of acceptance of office prior to the next meeting.

Minute 2025/26 - 003 - Apologies

Apologies for non-attendance received from Cllrs Claire Cozler, Paul Hart, Monika Stenneken, Jason Slater.

Minute 2025/26 - 004 - Declarations of Interest

Cllrs M Pattison, R Dennison, J Hanson, D Whitaker, J Livermore and M Bottoms declared membership of Lancaster City Council.

Cllr M Bottoms declared cabinet membership of Lancaster City Council.

Cllrs M Bottoms, R Dennison, John Hanson, and John Livermore declared membership of Lancaster City Council's Planning Committee. Cllr R Dennison advised he would remain in the meeting to discuss Item 7 (Planning Application 25/00392/ADV - Unit 1, Hilmore Way). Other members advised they would withdraw. The Proper Officer advised that it is within Lancaster City Council's constitution that members of their Planning Committee, who are also members of MTC do not need to withdraw from meetings as a matter of course (unless in cases where MTC may submit an application to LCC, in which dual hatted members would be expected to withdraw from LCC's meeting when the matter is discussed).

Cllr Russell Walsh declared membership of Lancashire County Council.

Minute 2025/26 - 005 - Minutes

The minutes of the last full council meeting were unanimously approved.

Minute 2025/26 - 006 - Public Participation

A request to speak was received. The speaker raised queries regarding the notice periods for meetings and the lack of MTC noticeboards throughout the Town. Cllr Joanne Ainscough advised that it had previously been minuted that MTC is purchasing new substantial noticeboards which will be installed once they have been manufactured. There is currently a local company manufacturing the noticeboards and they are anticipated to be in situ by August 2025.

(Cllrs John Hanson, Martin Bottoms and John Livermore withdrew from the meeting for the following item.)

Minute 2025/26 - 007 - Planning Objection - 25/00392/ADV (Unit 1 Hilmore Way, Morecambe - McDonalds)

The Council noted the objection that had been submitted by the Chief Officer, and agreed with its content.

The CO reminded members that the representation did not object to a siting of a McDonald's at the location, but it does raise concerns regarding the proposed 12-m high totem advertisement, which is considered disproportionately tall and visually intrusive in relation to the surrounding streetscape. In contrast to other signage in the area - such as the 5.8M Morrisons totem set back 16m from the carriageway and screened by mature trees - the proposed McDonalds sign would sit prominently within 5m of the road and be one of the first things people see arriving in Morecambe by train and it really could set the wrong tone for the ecological centre we are striving to become with Eden.

The Town Council agreed that a reduced height, limited to 5m, would be more in keeping with the current signage nearby.

Cllr Bates also reminded members to be wary of a future application that may arise, as was the case on Morecambe Road, whereby the applicant retrospectively applied to raise the agreed height of the McDonalds advertisement totem.

(Cllrs John Hanson, Martin Bottoms and John Livermore returned to the meeting.)

Minute 2025/26 - 008 - Policies and Procedures

The Council approved the amend to the Financial Regulations, which amended the wording of Section 6.17 to read:

"Personal credit or debit cards of members or staff shall not be used unless access to a corporate facility is unavailable, and only with the permission from the Clerk, RFO, or Line Manager."

The Council approved the amend to the Standing Orders, which amended the wording of Section 1A to read:

"Meetings of the Council shall be held on such dates and times and at such place as the Council may direction, except during the months of April, July/August and December. The Council should publish a list of full council meetings annually. The Chief Officer has delegated authority, in consultation with the Chairman, to cancel a meeting should there not enough business to consider, or it be considered an appropriate course of action (for example, during pre-election periods)."

The Council approved the amend to the Standing Orders, which amended the wording of Section 1C to read:

"Council members shall receive a summons sent by the Chief Officer, or another appropriate officer, specifying the business to be transacted...."

The Council approved the amend to the Standing Orders, which amended the wording of Section 1E to read:

"Subject to Standing Order 1(d) above, members of the public who are registered local government electors and/or business-rate payers may make representations, answer questions and give evidence at a meeting which they are entitled to attend strictly in respect of the business on the agenda, provided that their primary residence (or business) is within the administrative boundary of Morecambe Town Council. Qualifying members of the public who would like to make representations at a meeting must contact the Proper (Chief) Officer no later than 48 hours prior to the meeting to advise both of their wish to speak and the full content (providing a transcript if available). Other issues could be raised if written notice of the question/matter is submitted to the Proper (Chief) Officer ten working days prior to the meeting and the matter is considered appropriate for the agenda. A request to speak does not confer an automatic right to do so. All requests will be reviewed by officers, in consultation with the Chairperson of the Council or Committee, prior to the meeting. This is to safeguard the integrity of Council proceedings, prevent procedural misconduct, and mitigate legal and financial risks. Comments that could lead to undue disruption, expose the Council to legal challenge, or impact the wellbeing of staff - potentially resulting in avoidable costs to the public purse - will not be permitted. This approach ensures that public participation remains constructive while protecting the responsible use of public funds and resources. For the avoidance of doubt, and to ensure a constructive and orderly meeting, and in accordance with established protocols, public participation must not be used to:

- Make personal or defamatory remarks about individual councillors. While the public may raise concerns about council decisions or policies, personal attacks or allegations regarding the conduct of councillors are not appropriate for public discussion. Complaints regarding breaches of the Councillors' Code of Conduct should be referred to the Monitoring Officer, who is responsible for investigating such matters.*
- Discuss individual staff members, their performance, or any matters which may relate to them personally (HR or otherwise). Employment issues, including complaints about staff, are confidential and should be addressed through the appropriate procedures. Any concerns about staff conduct must be submitted in writing to the Proper (Chief) Officer. If the concern relates to the Proper (Chief) Officer, it should be directed in writing to the Chairperson of the Council and/or the Personnel Committee. However, members of the public may raise general concerns about service delivery, provided that any comments do not target specific individuals or relate to individual roles."*

Minute 2025/26 - 009 - Full Council Meeting Dates Civic Year 2025/26

The Council agreed the following meeting dates for full council meetings for the Civic Year 2025/26:

Thursday 19 June 2025

Thursday 18 September 2025

Thursday 16 October 2025

Thursday 20 November 2025

Thursday 29 January 2025

Thursday 19 February 2025

Thursday 19 March 2025

Minute 2025/26 - 010 - Supporting the Trans Community Following the Supreme Court Ruling on the Equality Act

Motion on notice proposed by Cllr David Whitaker (Equality, Diversity and Inclusion Champion), and seconded by Cllr Joanne Ainscough.

“On 16 April 2025, the UK Supreme Court ruled that for the purposes of the Equality Act 2010, the term "sex" refers strictly to biological sex as assigned at birth, even in cases where an individual holds a Gender Recognition Certificate (GRC). This decision has been upsetting, frustrating and deeply personal for many in the LGBTQ+ community, particularly those who are transgender or non-binary, causing widespread confusion and concern.

To clarify:

- A **transgender** person is someone whose gender identity does not align with the sex they were assigned at birth.
 - A **non-binary** person does not identify exclusively as male or female.
- The ruling raises serious and urgent questions about the future of equality legislation in the UK and how we ensure that all individuals are treated with dignity, fairness and respect - regardless of gender identity.

While the court has provided a legal interpretation, it is increasingly clear that the Equality Act - now nearly 15 years old - may not fully reflect the lived realities, rights, or challenges faced by trans people in modern Britain. Advances in medical, social and legal understanding of gender identity have far outpaced the legislation, creating gaps and inconsistencies in the law's application, and this ruling arguably fails to account for advances in gender-affirming healthcare or the psychosocial impacts of gender identity recognition, amongst other matters.

Trans people have always been a part of our world, and always will be. For many trans people, transitioning is not simply a matter of legal documentation. It is a journey - often marked by emotional, social, medical and legal obstacles - taken in pursuit of living a life that feels authentic to them.

Some individuals will have spent more of their lives post-transition than in the gender they were assigned at birth. For many of us, using a public toilet is such an ordinary part of life that we barely think about it. But imagine for a moment if stepping into that space meant risking your safety - not because of anything you've done, but simply because of who you are. For trans people, being told they must use facilities that don't align to who they are - and how they live every day - isn't just uncomfortable, it can be traumatic, dehumanising, and, sadly, dangerous. Being forced into a space that doesn't align with their identity can "out" a trans person against their will. Just imagine being in a situation where using a particular bathroom tells the whole room that you're trans - whether you wanted them to know or not. It's like being made to wear a sign that says "different", when you just want to go about your day like everyone else. This visibility can make people targets. Trans people are already more likely to experience harassment or violence in public spaces - something most of us thankfully don't have to think about when popping to use a bathroom in a café, shopping centre or train station. As writer Shon Faye puts it: "to be trans is to be made hypervisible and invisible all at once - seen as a spectacle, but not as a human being".

What this ruling has created is a legal confusion:

- Under the Gender Recognition Act 2004, a person's legal sex changes upon receiving a GRC (a Gender Recognition Certificate).
- Yet this latest ruling effectively decouples the Equality Act from the GRA, meaning legal recognition does not translate to protections in all settings - such as single-sex services.
This contradiction creates a grey area for public bodies, employers, and service providers, leaving frontline staff uncertain and vulnerable people without clear recourse. It may also lead to a patchwork of inconsistent approaches, which is not compatible with the principles of equality law.

It is especially important to recognise that the gender reassignment provisions within the Equality Act - designed to offer explicit protection to trans people - must not be overlooked, undermined, or misinterpreted. Section 7 of the Act protects individuals who are undergoing, have undergone, or are proposing to undergo gender reassignment. These protections remain legally in force, and it is critical that public bodies do not use this ruling to dilute or bypass them (EHRC, 2023).

Until further legislative reform or clarification is provided, there is a real risk that the existing legal framework undermines the safety and dignity of trans individuals - and that organisations may misinterpret or misuse this judgment, intentionally or otherwise.

What we're talking about here isn't abstract or theoretical - it's about real people trying to live their lives with dignity and without fear.

Therefore, this motion calls on Morecambe Town Council to:

1. **Affirm its unequivocal support for the trans and non-binary community - locally and nationally - and express support for those affected by this ruling.**
2. **Write to the National Association of Local Councils (NALC) to request urgent clarification, training and practical guidance on how local councils can remain compliant with the law while upholding values of inclusion and equality.**
3. **Explore ways to support local organisations, such as OITB, that provide frontline services and advocacy for LGBTQ+ people, especially those at risk of targeted abuse or exclusion.**
4. **Reaffirm our commitment to equality, and to ensuring our town remains a safe, welcoming and inclusive place for all, including those who are transgender or non-binary.
This is a moment for moral clarity. We must remember that trans people are our neighbours, friends, family members and colleagues. They are not abstract legal subjects but human beings deserving of safety, dignity and belonging.
As a local council, we may not be able to change the law - but we can lead by example, stand with those affected, and press for a more compassionate and inclusive future.**
5. **Send a letter outlining concerns to Lizzi Collinge MP."**

Cllr Whitaker acknowledged differing views on the ruling, even within the LGBT+ community itself, and outlined the concern and uncertainty it had created for many people who no longer feel safe. With echoes of Section 28, Cllr Whitaker emphasised how important it was for the Council to support the LGBT+ community. Cllr Whitaker also suggested regular EDI training should be undertaken by all councillors.

Cllr J Ainscough agreed with Cllr Whitaker and outlined how divisive this important issue has been for many communities and organisations. Cllr J Ainscough advised it wasn't good enough for NALC and the LGA to be working on what this means, stating we need action and direction now. It was agreed we need clarity urgently and quickly so people can be treated with the respect they deserve.

All five recommendations were approved by the Council.

Minute 2025/26 - 011 - Constitution of Committees

The Terms of Reference were approved for the below Committees:

- Planning and Regeneration
- Finance and Governance

- Personnel
- Environment
- Grants
- Festivals and Events

Minute 2025/26 - 012 - Membership of Committees

The below members, and Chairmen, were appointed by the Council to the below Committees:

Committee	Morecambe Bay Independents	Labour	Liberal Democrats	Reform	Independent
Grants	Cllr Jason Slater (Chairman), Cllr Wayne Dixon, Cllr Deborah Knight, Cllr Martin Bottoms	Cllr Claire Cozler, Cllr Christian Ainscough, Cllr John Goodrich	Cllr John Livermore	Cllr Russell Walsh	
Personnel	Cllr Roger Dennison (Chairman), Cllr Faye Cooper, Cllr Lee Bradbury, Cllr Jason Slater	Cllr Christian Ainscough, Cllr John Goodrich, Cllr Joanne Ainsouch	Cllr Paul Hart, Cllr Monika Stenneken		
Festivals, Sponsorships and Events	Cllr Lee Bradbury (Chairman), Cllr Geoff Knight, Cllr Faye Cooper, Cllr Roger Dennison, Cllr Deborah Knight	Cllr Margaret Pattison, Cllr Claire Cozler	Cllr John Livermore		Cllr Trish Clarke
Finance and Governance	Cllr Clark Kent (Chairman), Cllr Geoff Knight, Cllr Lee Bradbury, Cllr Martin Bottoms	Cllr Joanne Ainscough, Cllr John Goodrich, Cllr David Whitaker	Cllr John Bates, Cllr Jim Pilling,		
Environment	Cllr Geoff Knight (Chairman), Cllr Clark Kent, Cllr Dan Blacow, Cllr Jason Slater	Cllr Joanne Ainscough, Cllr Claire Cozler	Cllr Paul Hart, Cllr John Livermore	Cllr Russell Walsh	
Planning & Regeneration	Cllr Geoff Knight (Chairman), Cllr Lee Bradbury, Cllr Clark Kent, Cllr Martin Bottoms	Cllr Claire Cozler, Cllr David Whitaker	Cllr John Bates, Cllr Jim Pilling		Cllr Trish Clarke

Minute 2025/26 - 013 - Councillor Champion Roles

The below member were appointed to Councillor Champion Roles:

- Disability Champion - Cllr Claire Cozler
- Armed Forces Champion - Cllr Roger Dennison
- Multi-Dwelling Housing Champion - Cllr Martin Bottoms
- Equality, Diversity, and Inclusion Champion - Cllr David Whitaker

Minute 2025/26 - 014 - House of Lords Built Environment Committee - Inquiry into New Towns and Expanded Settlements

Members noted the Chief Officer would circulate a response to this planning consultation following the meeting, once it had been finalised.

Section 1 – Annual Governance Statement 2024/25

We acknowledge as the members of:

Morecambe Town Council

our responsibility for ensuring that there is a sound system of internal control, including arrangements for the preparation of the Accounting Statements. We confirm, to the best of our knowledge and belief, with respect to the Accounting Statements for the year ended 31 March 2025, that:

	Agreed		'Yes' means that this authority:
	Yes	No*	
1. We have put in place arrangements for effective financial management during the year, and for the preparation of the accounting statements.	✓		prepared its accounting statements in accordance with the Accounts and Audit Regulations.
2. We maintained an adequate system of internal control including measures designed to prevent and detect fraud and corruption and reviewed its effectiveness.	✓		made proper arrangements and accepted responsibility for safeguarding the public money and resources in its charge.
3. We took all reasonable steps to assure ourselves that there are no matters of actual or potential non-compliance with laws, regulations and Proper Practices that could have a significant financial effect on the ability of this authority to conduct its business or manage its finances.	✓		has only done what it has the legal power to do and has complied with Proper Practices in doing so.
4. We provided proper opportunity during the year for the exercise of electors' rights in accordance with the requirements of the Accounts and Audit Regulations.	✓		during the year gave all persons interested the opportunity to inspect and ask questions about this authority's accounts.
5. We carried out an assessment of the risks facing this authority and took appropriate steps to manage those risks, including the introduction of internal controls and/or external insurance cover where required.	✓		considered and documented the financial and other risks it faces and dealt with them properly.
6. We maintained throughout the year an adequate and effective system of internal audit of the accounting records and control systems.	✓		arranged for a competent person, independent of the financial controls and procedures, to give an objective view on whether internal controls meet the needs of this smaller authority.
7. We took appropriate action on all matters raised in reports from internal and external audit.	✓		responded to matters brought to its attention by internal and external audit.
8. We considered whether any litigation, liabilities or commitments, events or transactions, occurring either during or after the year-end, have a financial impact on this authority and, where appropriate, have included them in the accounting statements.	✓		disclosed everything it should have about its business activity during the year including events taking place after the year end if relevant.
9. (For local councils only) Trust funds including charitable. In our capacity as the sole managing trustee we discharged our accountability responsibilities for the fund(s)/assets, including financial reporting and, if required, independent examination or audit.	Yes	No	N/A
			✓

***Please provide explanations to the external auditor on a separate sheet for each 'No' response and describe how the authority will address the weaknesses identified. These sheets must be published with the Annual Governance Statement.**

This Annual Governance Statement was approved at a meeting of the authority on:

DD/MM/YYYY

and recorded as minute reference:

MINUTE REFERENCE

Signed by the Chair and Clerk of the meeting where approval was given:

Chair

SIGNATURE REQUIRED

Clerk

SIGNATURE REQUIRED

<https://www.morecambe.gov.uk/> ONLY AVAILABLE WEBSITE/WEBPAGE ADDRESS

Section 2 – Accounting Statements 2024/25 for

Morecambe Town Council

	Year ending		Notes and guidance
	31 March 2024 £	31 March 2025 £	
1. Balances brought forward	119,311	1,097,916	<i>Total balances and reserves at the beginning of the year as recorded in the financial records. Value must agree to Box 7 of previous year.</i>
2. (+) Precept or Rates and Levies	1,431,854	951,384	<i>Total amount of precept (or for IDBs rates and levies) received or receivable in the year. Exclude any grants received.</i>
3. (+) Total other receipts	103,316	93,769	<i>Total income or receipts as recorded in the cashbook less the precept or rates/levies received (line 2). Include any grants received.</i>
4. (-) Staff costs	262,431	418,321	<i>Total expenditure or payments made to and on behalf of all employees. Include gross salaries and wages, employers NI contributions, employers pension contributions, gratuities and severance payments.</i>
5. (-) Loan interest/capital repayments	0	0	<i>Total expenditure or payments of capital and interest made during the year on the authority's borrowings (if any).</i>
6. (-) All other payments	294,134	422,212	<i>Total expenditure or payments as recorded in the cash-book less staff costs (line 4) and loan interest/capital repayments (line 5).</i>
7. (=) Balances carried forward	1,097,916	1,302,536	<i>Total balances and reserves at the end of the year. Must equal (1+2+3) - (4+5+6).</i>
8. Total value of cash and short term investments	1,008,151	1,358,753	<i>The sum of all current and deposit bank accounts, cash holdings and short term investments held as at 31 March – To agree with bank reconciliation.</i>
9. Total fixed assets plus long term investments and assets	167,058	172,583	<i>The value of all the property the authority owns – it is made up of all its fixed assets and long term investments as at 31 March.</i>
10. Total borrowings	0	0	<i>The outstanding capital balance as at 31 March of all loans from third parties (including PWLB).</i>

For Local Councils Only	Yes	No	N/A	
11a. Disclosure note re Trust funds (including charitable)		✓		<i>The Council, as a body corporate, acts as sole trustee and is responsible for managing Trust funds or assets.</i>
11b. Disclosure note re Trust funds (including charitable)			✓	<i>The figures in the accounting statements above exclude any Trust transactions.</i>

I certify that for the year ended 31 March 2025 the Accounting Statements in this Annual Governance and Accountability Return have been prepared on either a receipts and payments or income and expenditure basis following the guidance in Governance and Accountability for Smaller Authorities – a Practitioners' Guide to Proper Practices and present fairly the financial position of this authority.

Signed by Responsible Financial Officer before being presented to the authority for approval

SIGNATURE REQUIRED

Date

DD/MM/YYYY

I confirm that these Accounting Statements were approved by this authority on this date:

DD/MM/YYYY

as recorded in minute reference:

MINUTE REFERENCE

Signed by Chair of the meeting where the Accounting Statements were approved

SIGNATURE REQUIRED

Morecambe Town Council
Summary of Receipts and Payments
All Cost Centres and Codes

12 June 2025 (2024-2025)

01 General Income

Code	Title	Receipts			Payments			Net Position
		Budgeted	Actual	Variance	Budgeted	Actual	Variance	+/- Under/over spend
16	Precept (Revenue)	1,101,384.33	951,384.33	-150,000.00				-150,000.00 (-13%)
52	VAT		-525.88	-525.88				-525.88 (N/A)
62	Treasury Management		13,162.85	13,162.85				13,162.85 (N/A)
SUB TOTAL		1,101,384.33	964,021.30	-137,363.03				-137,363.03 (-12%)

02 Corporate Services

Code	Title	Receipts			Payments			Net Position
		Budgeted	Actual	Variance	Budgeted	Actual	Variance	+/- Under/over spend
1	Office Rent / Room Hire / Securi		5,920.00	5,920.00	25,000.00	23,697.39	1,302.61	7,222.61 (28%)
2	Staffing				275,000.00	252,129.34	22,870.66	22,870.66 (8%)
3	Admin and Office Supplies		5.00	5.00	15,000.00	6,219.31	8,780.69	8,785.69 (58%)
4	Professional Services				15,000.00	12,122.28	2,877.72	2,877.72 (19%)
5	Insurance (PL/EL)				5,000.00	4,359.10	640.90	640.90 (12%)
6	Audits				15,000.00	20,817.00	-5,817.00	-5,817.00 (-38%)
7	Training/CPD				6,000.00	500.00	5,500.00	5,500.00 (91%)
21	IT Infrastructure				15,000.00	12,699.33	2,300.67	2,300.67 (15%)
50	Civic Expenses				2,500.00	1,250.00	1,250.00	1,250.00 (50%)
59	Staffing Ancillary					19,298.14	-19,298.14	-19,298.14 (N/A)
SUB TOTAL			5,925.00	5,925.00	373,500.00	353,091.89	20,408.11	26,333.11 (7%)

03 Town Maintenance (Public I

Code	Title	Receipts			Payments			Net Position
		Budgeted	Actual	Variance	Budgeted	Actual	Variance	+/- Under/over spend
23	Weeding Services (County)	63,295.67	142,335.63	79,039.96				79,039.96 (124%)
24	Equipment/Fleet Purchase				80,000.00	95,940.54	-15,940.54	-15,940.54 (-19%)
31	Staffing (Public Realm)				225,000.00	173,057.49	51,942.51	51,942.51 (23%)
33	Equipment/Fleet Repair		24.00	24.00	5,000.00	4,051.98	948.02	972.02 (19%)
34	Fleet Purchase							(N/A)
35	Insurance (Motor)				2,000.00	651.95	1,348.05	1,348.05 (67%)
36	Weed Control (LCC)				10,000.00	8,374.98	1,625.02	1,625.02 (16%)
37	Weed Control (MTC)				10,000.00	6,050.00	3,950.00	3,950.00 (39%)
38	Software/Mobiles				10,000.00	5,698.46	4,301.54	4,301.54 (43%)
39	Utilities					278.24	-278.24	-278.24 (N/A)
41	Casual Staff				30,680.00		30,680.00	30,680.00 (100%)
43	PPE				5,000.00	3,140.32	1,859.68	1,859.68 (37%)
48	Training (Public Realm)							(N/A)
54	Public Realm Enhancements				50,000.00	16,457.93	33,542.07	33,542.07 (67%)
56	Contingency				16,500.00		16,500.00	16,500.00 (100%)
57	Allotments				2,500.00	919.64	1,580.36	1,580.36 (63%)
60	Staffing Ancillary (PR)					3,922.20	-3,922.20	-3,922.20 (N/A)
SUB TOTAL		63,295.67	142,359.63	79,063.96	446,680.00	318,543.73	128,136.27	207,200.23 (40%)

Morecambe Town Council

Summary of Receipts and Payments

All Cost Centres and Codes

12 June 2025 (2024-2025)

04 Community Grants

		Receipts			Payments			Net Position
Code	Title	Budgeted	Actual	Variance	Budgeted	Actual	Variance	+/- Under/over spend
32	Grants		625.00	625.00	35,000.00	19,080.00	15,920.00	16,545.00 (47%)
SUB TOTAL			625.00	625.00	35,000.00	19,080.00	15,920.00	16,545.00 (47%)

05 Cultural Services

		Receipts			Payments			Net Position
Code	Title	Budgeted	Actual	Variance	Budgeted	Actual	Variance	+/- Under/over spend
12	Festivals/Events (Grants Awarde		1,579.00	1,579.00	60,000.00	59,140.00	860.00	2,439.00 (4%)
15	Morecambe Lights				20,000.00	25,000.00	-5,000.00	-5,000.00 (-25%)
45	Council Events/Partnerships				60,000.00	2,984.07	57,015.93	57,015.93 (95%)
46	Grants Received							(N/A)
51	Event Equipment							(N/A)
58	Staffing/Casual				59,000.00		59,000.00	59,000.00 (100%)
SUB TOTAL			1,579.00	1,579.00	199,000.00	87,124.07	111,875.93	113,454.93 (57%)

06 Communications Expenditu

		Receipts			Payments			Net Position
Code	Title	Budgeted	Actual	Variance	Budgeted	Actual	Variance	+/- Under/over spend
8	General Communications				15,000.00	3,118.39	11,881.61	11,881.61 (79%)
10	Community Engagement				15,000.00	1,073.35	13,926.65	13,926.65 (92%)
53	Tourism				5,000.00		5,000.00	5,000.00 (100%)
61	Website				22,000.00	3,243.00	18,757.00	18,757.00 (85%)
SUB TOTAL					57,000.00	7,434.74	49,565.26	49,565.26 (86%)

07 Planning and Regeneration

		Receipts			Payments			Net Position
Code	Title	Budgeted	Actual	Variance	Budgeted	Actual	Variance	+/- Under/over spend
26	Neighbourhood Plan				5,000.00		5,000.00	5,000.00 (100%)
SUB TOTAL					5,000.00		5,000.00	5,000.00 (100%)

Summary								
NET TOTAL		1,164,680.00	1,114,509.93	-50,170.07	1,116,180.00	785,274.43	330,905.57	280,735.50 (12%)
V.A.T.			63,744.00			42,377.32		
GROSS TOTAL			1,178,253.93			827,651.75		

Morecambe Town Council

Prepared by: _____

Date: _____

Name and Role (Clerk/RFO etc)

Approved by: _____

Date: _____

Name and Role (RFO/Chair of Finance etc)

A	Bank Reconciliation at 31/03/2025		
	Cash in Hand 01/04/2024		1,008,150.66
	ADD Receipts 01/04/2024 - 31/03/2025		1,178,253.93
	SUBTRACT Payments 01/04/2024 - 31/03/2025		827,651.75
	Cash in Hand 31/03/2025 (per Cash Book)		1,358,752.84
B	Cash in hand per Bank Statements		
	Petty Cash 31/03/2025	208.68	
	Unity Trust 31/03/2025	808,544.16	
	Investment 31/03/2025	550,000.00	
	Access Savings 31/03/2025	0.00	
	Credit Card 31/03/2025	0.00	
			1,358,752.84
	Less unrepresented payments		
			1,358,752.84
	Plus unrepresented receipts		
	Adjusted Bank Balance		1,358,752.84
	A = B Checks out OK		



**Morecambe Town Council
Full Council – 19.06.25
Armed Forces Covenant and Employer Recognition Scheme**

Introduction:

This report provides a brief overview of the Armed Forces Covenant and the associated Employer Recognition Scheme; proposes draft pledges for inclusion if Morecambe Town Council were to sign the Covenant; and offers recommendations for members' consideration.

Armed Forces Covenant

The Armed Forces Covenant is a promise that together we acknowledge and understand that those who serve or have served in the Armed Forces, and their families, including the bereaved, should be treated with fairness and respect in the communities, economy, and society they serve with their lives.

Its two principles are that, recognising the unique obligations of, and sacrifices made by, the Armed Forces:

- Those who serve in the Armed Forces, whether Regular or Reserve, those who have served in the past, and their families, should face no disadvantage compared to other citizens in the provision of public and commercial services.
- Special consideration is appropriate in some cases, especially for those who have given most such as the injured and the bereaved.

All organisations – public, private or voluntary, and small, medium or large – may choose to sign the Covenant in order to demonstrate their support for the Armed Forces community and for the principles of the Covenant.

While all signatories pledge to uphold, and act in accordance with, the basic principles of the Covenant, organisations must include additional pledges tailored to suit their circumstances, meaning they are free to specify – with as much or as little detail as thought necessary – how exactly they plan to support and uphold the Covenant.

These pledges are included in the signed document and once made, the Council is publicly committed to delivering on them. Organisations found not to be fulfilling their pledge can have their Armed Forces Covenant status reviewed.

Employer Recognition Scheme

Signatories of the Armed Forces Covenant become eligible for recognition in the associated Defence Employer Recognition Scheme, which encourages employers to support defence and inspire others to do the same. The scheme encompasses Bronze, Silver and Gold awards for employer organisations that

pledge, demonstrate or advocate support to defence and the armed forces community, and align their values with the Armed Forces Covenant.

The Council would become eligible for the Bronze Award and could self-nominate for this award on signing the Covenant. The Silver and Gold award require an organisation to meet additional criteria supported by an evidenced body of work that demonstrates the organisation delivering on the pledges made in the Covenant, which is assessed by an external panel.

Draft Pledges

Officers have drawn up a list of draft pledges based on the assumption that the Council would aim to achieve Gold award status in the Employer Recognition Scheme in future. Considerations included any resulting actions that would need to be taken to ensure the pledges can be upheld and the practicality of achieving them – for example, the revision of relevant policies or adaptations in the Council's recruitment practices.

Employment support

- Being a committed forces-friendly employer, welcoming and encouraging applications from the Armed Forces Community for our vacancies
- Supporting Reservists and Cadet Forces Adult Volunteers within our staff by offering volunteering days to carry out their duties and training requirements and supporting any mobilisations and deployment;
- Providing flexibility in granting leave for Service spouses and partners before, during and after a partner's deployment.

Communications, engagement and outreach

- Appointing an Armed Forces Champion within the organisation each civic year to act as a focal point for organising and promoting support for the Armed Forces Community.
- Providing and/or promoting training for staff and Councillors about the Armed Forces Covenant.
- Promoting the Armed Forces Covenant and our support for the Armed Forces Community.
- Promoting local Armed Forces support networks, awareness-raising schemes and dedicated healthcare services for members of the Armed Forces Community.
- Engaging with local Armed Forces charities and/or organisations and where appropriate, providing support.
- Developing relationships and working collaboratively with other organisations supporting the Covenant and the Armed Forces Community in our area.

Civic responsibilities

- Organising, facilitating, promoting or taking part in Remembrance and other ceremonial activities and Armed Forces events.

Recommendations

That the Council resolves to:

- Sign the Armed Forces Covenant, incorporating the pledges listed above.
- Submit an application for Bronze award in the associated Employer Recognition Scheme.
- Instruct Officers to work with the Armed Forces Champion and Councillors to begin building a body of evidence in support of future submission for Silver and Gold awards.



Morecambe Town Council

Morecambe Town Hall,
Marine Road
Morecambe
Lancashire
LA4 5AF

www.morecambe.gov.uk

Complaints Procedure

Adopted by Morecambe Town Council on XX.XX.XX

Introduction

This procedure acknowledges that we value complaints. They help us improve and deliver better services. Feedback helps us learn and make changes where needed.

This procedure sets out how we handle feedback from customers and individuals. It ensures that complaints are dealt with fairly, promptly, and with respect. It also supports our commitment to high-quality services and should be taken in alignment with other relevant legal and policy requirements.

Please note, this procedure does not cover internal complaints or those raised by council members.

- **Council decisions:** members can challenge decisions through procedures outlined in the Standing Orders.
- **Member conduct:** complaints about a members should be directed to the Monitoring Officer at the Principal Authority.
- **Officer conduct:** complaints about officers will follow the Council's HR policies.

What is a Complaint?

We adhere to the Local Government Ombudsman and Housing Ombudsman definition of a complaint. Therefore we consider a complaint to be:

"An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual or group of individuals."

The council recognises that there is a difference between a service request and a complaint.

A service request is a request from a customer to the council requiring action to be taken to put something right. Service requests are not complaints, but they will be recorded, monitored and reviewed regularly.

A complaint is raised when a customer expresses dissatisfaction with the response to their service request, even if handling the service request remains ongoing.

The council will not stop its efforts to address the service request if the customer complains.

If this is the first time you are reporting an issue to us, we may decide to treat this as a request for service. Once recorded, incoming feedback is reviewed by officers, who ensure the matter is recorded correctly.

Listed below are the categories of complaints which fall within the procedure and those which are excluded (this is not an exhaustive list).

Categories of Permissible Complaint:

- Failure to follow agreed council procedure, policy, rules or standards of service.
- Failure to take account of relevant matters in coming to a decision.
- Neglect or unjustified delay.
- Inappropriate behaviour of a council employee or someone acting on the council's behalf.
- Malice, bias or discrimination.
- Appeals against any council actions or decisions where a statutory right of appeal exists.
- In the case of complaints about discrimination concerning the protected characteristics under the Equality Act 2010 (i.e., race, religion, or belief, disability, sexual orientation and gender identity) the council will take into account its obligations under the Act and related corporate policies and objectives on equality.
- Data Protection related complaints will be dealt with in consultation with the council's Information Governance policies considering the council's statutory obligations and information security policies.

Exclusions:

Complaints will be accepted unless there is a valid reason not to do so.

Below is a list of the reason why a complaint may not be investigated.

- Day to day service requests or initial reporting of faults.
- Criticisms or disagreement with council policies. In such cases, feedback will be noted.
- Complaints against individual employees which arise from, or are aligned to, dissatisfaction with a council policy or decision, and where no other basis for the complaint exists.
- Appeals against any council advice, actions, or decisions where a statutory right of appeal or other council appeals/review procedure exists.
- Matters that have previously been investigated and responded to.
- A matter which is, or could be reasonably be expected to be, the subject of Court or tribunal proceedings, an ongoing Police investigation, or which is in hands of the council's insurers. Challenge of a Council or Committee decision would generally be by way of Judicial Review.
- Complaints which constitute a refusal to accept a rule of law which the council is applying.
- Complaints about the conduct of councillors. These should be submitted in writing to the Monitoring Officer.
- With complaints it is far easier to find out what happened and put things right if they are received soon after they occur. As time passes it becomes harder for us to investigate

events fairly and fully - people's memories fade, staff who were involved leave the council, or records may no longer be available. For these reasons, the council will only accept complaints made within three months of the incident or circumstances that led to the complaint.

Who can make a Complaint?

Any elector, or individual or organisation, that uses or receives a council service and feels disadvantaged, or feel they are about to be disadvantaged through the actions of the Council, may make a complaint.

A complaint can also be made on behalf of a service user by a town councillor.

No anonymous complaints will be accepted.

How a Complaint can be Made

Complaints must be made in writing (by post or email) and include all of the below details.

Full Name

Postal Address

Contact Email Address

Contact Telephone Number

A Full Description of Complaint

How a Complaint will be Handled

When a complaint is received, it will be assigned to a senior officer within the relevant service area to which the complaint relates. This officer will be responsible for fully investigating the matter and providing a response to the complainant.

To ensure a thorough and accurate understanding of the concerns raised, the officer may contact the complainant for clarification or to gather additional information.

A decision regarding the complaint will normally be issued within 30 calendar days of receipt. If, due to the complexity of the issue or other justifiable reasons, an extension is necessary, the officer will notify the complainant and provide an updated timescale for the response.

If the complainant is dissatisfied with the outcome, they have the right to submit an appeal. Appeals must be lodged within 20 calendar days of the original decision being communicated.

All appeals will be reviewed independently and will not involve the officer who handled the initial complaint. The appeal submission must clearly state the reasons for disagreement with the original decision and provide any relevant supporting information.

As with the initial complaint, the officer reviewing the appeal may contact the complainant to ensure a full understanding of the issues raised.

A decision on the appeal will usually be provided within 30 calendar days of receipt. Should an extension be required, the complainant will be informed of the revised timescale and the reason for the delay.

Putting things Right

When something has gone wrong, the Council will acknowledge this, and it will inform the complainants of the actions it has already taken or intends to take, to put things right.

These can include:

- Apologising;
- Acknowledging where things have gone wrong;
- Providing an explanation, assistance or reasons;
- Taking action if there has been a delay;
- Giving reconsideration to a decision;
- Correcting or amending a record;
- Changing policies, procedures, or practices

The Council is committed to treating all complainants with fairness, dignity, and respect. It aims to address the substance of all complaints, wherever reasonably possible, in line with its duty to ensure transparency and accountability in service delivery.

However, the Council must also ensure that the time and public resources dedicated to managing complaints are used effectively and proportionately. As such, it reserves the right to take appropriate action where a complainant's behaviour is considered to be abusive, unreasonably persistent, or otherwise unreasonable.

A complainant may be considered to be acting unreasonably where their conduct impedes the proper handling of their complaint, places undue strain on staff or resources, or where their actions are deemed aggressive, repetitive, or without merit. Examples of such behaviour include (but are not limited to):

- Refusing to co-operate with the complaint investigation process.
- Persistently refusing to accept that certain matters fall outside the scope of the complaints procedure.
- Making repeated or unfounded accusations about staff, including demanding replacement of investigating officers without justification.
- Changing the substance or basis of a complaint during the investigation process without valid cause.
- Introducing irrelevant or trivial information at a late stage in the process.
- Engaging in frequent, excessive, lengthy, or repetitive communications that do not add value to the investigation.
- Submitting successive complaints with minor variations that do not materially change the substance of the issue.

- Persistently refusing to accept a decision or outcome, repeatedly disputing it without providing any new evidence or rationale.
- Using abusive, threatening, offensive, malicious, demeaning, or otherwise inappropriate language or behaviour.

Where the Council determines that a complainant's behaviour meets the threshold of being unreasonably persistent or abusive, appropriate steps will be taken to manage the situation.

These may include:

- Placing limits on the frequency, method, or subject of communication.
- Refusing to consider further complaints about the same issue.
- Declining to accept correspondence that is abusive, threatening, or defamatory.
- Assigning a single point of contact within the Council.
- In extreme cases, terminating contact entirely.

Before taking any such action, the Council will inform the complainant in writing of its concerns and explain the action it intends to take. Where applicable, the complainant will be given an opportunity to modify their behaviour.

The Council takes the safety and wellbeing of its staff and members seriously. Any behaviour that is deceitful, offensive, threatening, malicious, harassing, or otherwise unacceptable will not be tolerated. Such conduct may result in:

- Reporting the matter to the Police, particularly where threats or harassment occur.
- Implementing immediate restrictions on contact with the complainant.
- Taking legal action, including but not limited to seeking injunctions or other civil remedies.

If legal proceedings or a police investigation are active, the Council may limit or suspend contact with the complainant to ensure due process and judicial rules of procedure are observed.

Replies to Complaints

Complaints are an opportunity to resolve a problem and learn from feedback.

A reply to a complaint will usually contain:

- A summary of the complaint;
- Steps taken to investigate the complaint;
- The decision and reasons for it;
- Reference to whether the Council upholds, or does not uphold the Complaint;
- An apology if appropriate;

- Information on any action that is going to be taken to resolve the problem;
- Details of any service improvements as a result of the complaint;
- Details of the appeal process.

Please note that any matters relating to individual members of staff are considered personal and confidential. In accordance with the principles of the General Data Protection Regulation (GDPR), the Council is unable to provide updates or disclose information regarding such matters. This is to ensure the privacy and data protection rights of all employees are upheld.

Retention of Records

The Council aims to resolve issues as quickly as possible.

Records will be kept of each complaint and information which relates to complainants will be treated confidentially with access limited to those involved in resolving the matter.

Data arising from complaints will be used to improve service delivery.

Review

This policy will be reviewed frequently and available on the Council's website at all times.



Morecambe Town Council

Morecambe Town Hall,
Marine Road
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LA4 5AF

www.morecambe.gov.uk



6 February 2024

OBJECTION

23/01384/OUT (Land off Powderhouse Lane)

Dear Planning Officer,

RE: Planning Application 21/01341/OUT

I am writing to advise Morecambe Town Council, as a statutory consultee, objections to Planning Application 23/01384/OUT in the strongest possible terms.

1. Positioning in the Countryside

The site is designated as Key Urban Landscape (KUL) under Policy DN5 and Open Countryside in the Local Plan.

The Local Plan does not contain an urban area policy. This is confirmed in paragraph 1.5 of the Strategic Policies and Land Allocations document which notes that the policies map identifies where policies apply and what specific uses land is allocated for. It goes on to state that although the Council does not have an urban area policy an urban area boundary is shown on the policies map. The paragraph advises that the boundary is intended to be helpful in delineating the land within the district which is not subject to Open Countryside policy.

It is noted that the supporting planning statement does not consider it possible for the application site to be simultaneously within both the boundary of the urban area and designated as open countryside. It is understood that the site is unequivocally designated as Open Countryside and as such must be determined in this context.

Policy EN3 'Open Countryside' states that any development proposals located within open countryside should have due regard to all relevant policies contained within the Local Plan, in particular policies within the Development Management DPD relating to development in the rural area.

Policy SP3 'Development Strategy for Lancaster District' promotes an urban-focussed approach to development with development concentrated towards the main urban areas of Lancaster, Morecambe, Heysham and Carnforth. The development of land designated as open countryside

in the Local Plan is not consistent with the development strategy for the district and is not a location that should support development.

2. Removal of Green Belt Designation & Discussion of Alternative Uses at Public Examination

Prior to the adoption of the new Local Plan the site had been included within the Green Belt. As part of the preparation of the Local Plan, Lancaster City Council undertook a Green Belt Review in 2016. This established the opportunity to re-align the Green Belt boundary in the Torrisholme area to follow a more definable feature, namely the West Coast Mainline and the newly constructed Bay Gateway. The Council stated that following its removal it would be identified as Open Countryside.

The issue of re-aligning the Green Belt in the Torrisholme area was well-explored as part of the Hearing Sessions of the Local Plan Examination. The Inspector's Report supported the amended boundary and noted that its removal did not mean that it would be identified for development purposes and would instead be designated as Key Urban Landscape under Policy EN5 of the Local Plan and as an area of open space and as a Scheduled Ancient Monument due to its recreational and historical importance (paragraph 163 "the land will not be identified for development purposes"). Whilst the Inspector refers to open space it is presumed that the actual designation being referred to was Open Countryside with this being the alternative designation suggested by Lancaster City Council in its Matters Statement for this issue.

This site was also explored as an alternative location for development through the examination process. Whilst developers supported the removal of the site from the Green Belt. The Inspector made clear in paragraph 63 of his report that it was the focus of his report to consider whether the process the Council followed in selecting sites was sound and whether allocations will meet the development requirements. The Inspector did not see it as his role to discuss and conclude on the merits of the other sites as alternatives.

The Inspector concluded that reasonable alternatives had been assessed through the SHELAA and SA and concluded in paragraph 72 that he was satisfied that the reasons for selecting allocated sites and rejecting others was clear and the conclusions reached reasonable. On this basis the site selection process was considered to be robust. It is important to note that this conclusion was reached in the context of an acknowledgment from the City Council that it was unable to meet its Objectively Assessed Housing Need with a lower housing requirement being promoted.

3. Local Landscape Designation

In addition to the Open Countryside designation the site is also allocated as Key Urban Landscape (KUL) in the Local Plan.

The Local Plan identifies two types of local landscape designations: Urban Setting Landscape (USL) and KUL. Both are protected and allocated under Policy EN5 'Local Landscape Designations' of the Strategic Policies and Land Allocations document. The Local Plan landscape designation was informed by specific externally procured professional advice, described below, that was part of the evidence base submitted along with the Local Plan. The designation recognises that identified areas perform a significant role in defining the character of the district with many landscapes providing the setting for significant areas and features that together contribute and define the character of the district. Policy EN5 states that development proposals within these areas will only be permitted where they preserve the open nature of the area and the character and appearance of its surroundings.

The Council attaches great importance to maintaining the open nature of both KUL and USL and will look to protect them from inappropriate development which would erode this character.

KULs and USLs are protected under Policy DM46 'Development and Landscape Impact' of the adopted Development Management DPD. This states that the contribution that these areas make to the character and setting of the urban areas of the district will be conserved and important

natural features safeguarded, providing particular regard to the historic townscape and built form of the urban areas. The policy goes on to state that within these areas Lancaster City Council will only support development that preserves the open nature of the area and the character and appearance of its surroundings.

The local landscape designation is a well-established local designation in the district. Historically only KUL were identified however through the preparation of the new Local Plan Lancaster City Council recognised the need to sub-divide this local designation to more accurately reflect the varying role that these landscapes provide and to consider new areas for designation. Policy EN5 therefore identifies both KUL and USL.

This area was identified as one of 10 new local landscape designations by landscape consultants Arcadis in their 'Key Urban Landscapes Review' document (May 2018). The report concluded that the site contained strong cultural heritage with distinctive landform and mature well managed landscape features and that it was a landscape which has significant qualities and is distinct in appearance, providing a setting for the adjacent areas. It was scored the highest out of all the new areas assessed and was recommended as KUL.

The Inspector considered that the sites had been subject to a robust landscape assessment with the provisions in Policy EN5 in respect of these designations considered to be necessary and justified. The proposed development would clearly be contrary to the designation of the site as KUL and as such contrary to the adopted Local Plan. It would significantly reduce the extent and function of this valuable local landscape designation at this location.

It is noted that the some evidence will be used to conclude that this part of the KUL designation makes a very limited contribution to the purposes of the KUL, and consequently, that the proposed development will have a negligible adverse effect on the KUL overall on the basis that it will not harm and will beneficially preserve and enhance the open nature of the most important part of the KUL.

Whilst recognising this evidence Morecambe Town Council does not support this view and would consider that any development of the KUL would impact on the integrity of this designation with the whole site providing a valued local landscape which should be protected.

4. Strategic Housing and Employment Land Assessment (SHELAA)

The land is situated in the Parish of Slyne with Hest and the Neighbourhood Plan of that Parish has already identified the land needed for Housing Development under the terms of the City Council's SHELAA and, as such, there is no need for further housing development in that Parish.

The site was submitted as part of a larger site to Lancaster City Council as part of its Strategic Housing and Employment Land Availability Assessment (SHELLA) (LPSA_712). This considered that whilst the site as a possible urban extension was not suitable, small-scale development may be appropriate, particularly at the northern end of the site.

As described in appendix C of the SHELAA 'Post SHELAA Site Assessment Paper' the SHELAA is a policy neutral process concerned only with assessing the deliverability of sites. Only through the Local Plan process having regard to Lancaster City Council's wider evidence base and wider policy considerations can the most appropriate use for sites be determined. Recognising this fact the SHELAA contained a Post SHELAA Site Assessment Paper. This allowed for an additional stage of assessment having regard to alternative allocations. The paper recognised that there were a number of sites, such as this site, which whilst receiving positive consideration in the SHELAA, Lancaster City Council believed that alternative designations would be more appropriate.

In considering this site Lancaster City Council concluded that whilst potentially developable the local landscape designation should be applied. This decision was made having regard to the Council's housing land supply position and wider development strategy for the district. This was supported by the Planning Inspector.

5. Housing Mix

The SHMA and OAN Verification Study identifies a district wide annual imbalance of 376 affordable homes each year. It is this high level of need which the requirement for affordable housing provision within the Local Plan seeks to address. The provision of affordable homes on developer led sites will account for a large percentage of the delivery of affordable housing in the district. Even if the percentages sought within the Local Plan policies are delivered, the shortfall in affordable housing will not be met and will remain significant. It is therefore important to ensure that each site makes an appropriate contribution to meeting the affordable housing need for the whole district.

Policy DM3 'The Delivery of Affordable Housing' sets out the requirement for affordable housing by area and the Wards within these areas are shown at figure 4.1 of the DMDPD. The site is within the Ward of Bolton-with-Slyne which falls within the Rural West area. Policy DM3 is therefore clear that the percentage of affordable homes required at the site is 30%. The applicant aims to provide 15% of the new homes as affordable, but caveats this with the comment that the percentage will be subject to a financial appraisal at reserved matters stage. It is also stated at 6.32 of the Planning Statement that whilst the site may geographically be within the Parish of Slyne with Hest, the application site is physically part of Morecambe. This geography has been used in an aim to justify the provision of only 15% affordable homes. The interpretation/justification provided by the applicant, is incorrect, policy DM3 requires the provision of 30% of the new homes at this site as affordable home. Even if 15% of the homes are provided as affordable, which is unclear at present, the proposed development would not accord with Policy DM3.

6. Flooding

The Land regularly suffers from floods which result from rainfall and inadequate land permeability. The Flood risk assessment accompanying the application clearly understates this risk and as such it must be clear that any measures proposed to ameliorate the risk must be inadequate. The subsequent "run off" to surrounding areas which already flood at times of high rainfall will exacerbate an already existing problem. The flooding of surrounding areas at times of high rainfall clearly indicates the incapability of the local drainage system to cope at times of high stress and, as such, will be wholly incapable of receiving additional "run off" from the proposed development.

7. Heritage

A heritage impact assessment was prepared for this site as part of the Local Plan process. This recognised that the site made a contribution to the setting and significance of designated and non designated heritage assets. This includes Torrisholme Bowl Barrow (Scheduled Monument), Belmont Bridge (Grade II listed), Williamlands Farm (NDHA) and Belmont Farm (NDHA). The main issue related to the impact on the Scheduled Monument.

The assessment went on to conclude that the harm caused to the significance of the Scheduled Monument is considered to be major as it would subsume and surround the asset. Some of the harm could be mitigated through the restriction of development north of Hasty Brow Road and restriction of heights of buildings to 2 storeys. This would reduce some of the visual impact on views of the asset from the east, but views from the asset would still be negatively impacted. Overall, the harm caused by development of the site would not be outweighed by enhancements such as increased interpretation and the mitigation measures are unlikely to reduce the harm on the Scheduled Monument significantly.

Conclusion

The site's location on the edge of the urban area is relatively remote from many services such as schools, employment areas, health facilities. The IHT guidance states that an acceptable distance to schools and work is 1km, to town centres 400m and elsewhere 800m. Reference is made to a local centre which, taking into account the indicative layout of the site, is in excess of 800m from much of the site.

The indicative layout shows that walking and cycling is not prioritised and contrary to the NPPF (paragraph 110) and fails to maximise the opportunities for cycling and walking in accordance with Policy DM60. Although in outline form it would be beneficial to see a revised layout showing how walking and cycling can be prioritised within the site.

The site is designated as Open Countryside and allocated KUL in the recently adopted Local Plan and as such is not somewhere where the council would support development.

Paragraph 11 of the NPPF states that where a local authority is unable to demonstrate a 5 year supply of deliverable housing sites granting planning permission unless i) the application of policies in the framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

The Local Plan was subject to extensive consultation and is informed by a thorough evidence base; the allocations, including the identification of significant strategic development sites, were concluded through a robust Examination process. The achievement of planning consent for proposals on sites that were specifically precluded for development purposes by such as recently adopted plan would undermine confidence in the forward planning process. 6 It is therefore considered by Morecambe Town Council that the scheme should be refused due to the significant harm identified.

Yours sincerely,

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

Mr Luke Trevaskis
Chief Officer
Morecambe Town Council