

Agenda Item	A9
Application Number	23/00858/FUL
Proposal	Relevant demolition of existing buildings, erection of five storey building comprising ground floor unit (Use Class E) and hotel (Use Class C1) with roof level plant space/enclosure, ancillary facilities, associated works and landscaping
Application site	228 - 235 Marine Road Central Morecambe Lancashire
Applicant	Mr L Averill
Agent	Clare Bland
Case Officer	Mr Andrew Clement
Departure	None
Summary of Recommendation	Approval, subject to conditions

1.0 Application Site and Setting

1.1 The site relates to 228 - 235 Marine Road Central, a row of properties within a mixed architectural terrace. The property fronts towards Marine Road Central, facing Morecambe Bay beyond a local authority car park and the promenade. Morecambe promenade is a designated open space, green space network, seafront, designated cycle route and a key pedestrian route and with the coastal area beyond to the west. The terrace row occupies a prominent position within the Morecambe Conservation Area, bookended by positive buildings as identified within the conservation area appraisal. The eastern positive building is a gable fronted 3.5 storey property with an impressive curved shop frontage, culminating towards the western end of the terrace row of much smaller two and one storey property.

1.2 The proposed development sits between these, relatively central within the terraced row, within intervening retained properties between the development and the ends of the row. The buildings sought to be demolished to facilitate the proposed development are largely 3 and 2.5 storey tall properties of various designs and architectures. The existing properties and uses within the application site includes a long established and characterful antiques and décor retail unit, adjacent to a recently relocated cycle shop/repairs, a long-established takeaway and a closed dance studio at ground floor level, with holiday accommodation rooms, office room hire and business growth specialists, and residential maisonettes/apartments to the upper floors. The rear of these properties faces directly over another carpark beyond the narrow one-way West View Road. The Grade II* Listed Building of Victoria Pavilion (commonly referred to as the 'Winter Gardens') is located circa 80 metres to the west within the next terrace row, with the Midland Hotel on the opposite side of Marine Road Central circa 360 metres west. Numbers 217, 219 and 221 Marine Road Central (Craven Terrace) are listed as a group at Grade II, between the application site and the Winter Gardens within the next terrace row.

1.3 The front forecourt external area is partially within Flood Zone 3, less than 1 in 200 annual probability

of sea flooding, whilst the proposed building itself is partially located within Flood Zone 2 to the rear, on land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding, although beyond the recently refurbished coastal flood defence wall. The site is also in an area of superficial deposits groundwater flooding risk, and at a 1in30 year flooding events risk of surface water flooding to West View Road to the rear. Morecambe Bay is an environmentally important area that benefits from designation as a Special Area of Conservation; Special Protected Area (SPA); Ramsar Site; Site of Special Scientific Interest (SSSI). The site is within an impact risk zone and buffer for the designated SSSI and SPA, within a Nature Improvement Area. The wider area is within a parking permit zone for residential properties, within the Morecambe town centre area, Morecambe Area Action Plan (MAAP) area, and the main Regeneration Priority Area for the district.

2.0 Proposal

2.1 This application seeks planning permission for the demolition of circa 46 metres of the terrace row, and construction of an infill development in place of the demolished buildings, attached within the existing terraced row. The proposal seeks to provide retail space and restaurant (both Use Class E) to part of the ground floor, with the remainder and above four floors occupied by a proposed hotel use, providing 86 rooms of hotel accommodation.

2.2 The proposed development is largely across 5 storeys, at a maximum height of approximately 17.2metres above the external ground level to West View Road, and circa 15.7 metres above the external ground level to marine Road Central due to changes in levels from the back and front of the site respectively. The proposed development is to be finished in a mix of pitched and smooth faced sandstone to the lower three and four storeys, with the upper elements slightly setback (greater setback at 5th storey) and finished in standing seam grey cladding. The depth of building is to match those existing within the terraced row, whilst the existing front forecourt area is to be combined and to remain a bound external space to be used in association with the proposed uses.

3.0 Site History

3.1 A number of relevant applications relating to this site have previously been received by the Local Planning Authority. These include:

Application Number	Proposal	Decision
23/00603/EIR	Screening request for the demolition of existing buildings and proposed construction of a hotel (Use Class C1) with ancillary facilities, landscaping and associated works	Environmental Statement not required
22/01034/PRE3	Demolition of existing buildings and construction of a Class C1 hotel	Advice provided
13/00783/CU	Change of use of retail (A1) to hot food takeaway (A5) including refurbishment of shop front with internally mounted roller shutter box and siting of new extractor flue to rear	Approved
11/00396/CU	Change of use to dance studio	Approved
09/00036/CU	Change of use from shop to community centre	Approved

4.0 Consultation Responses

4.1 The following responses have been received from statutory and internal consultees:

Consultee	Response
Morecambe Town Council	No observations received
Conservation Section	Object to the use of inappropriate materials because of the harm this would cause in heritage terms to several heritage assets, which could be avoided with improvements. No objection to this application in principle.
Historic England	Concerns regarding the application on heritage grounds. Demolition of the existing

	buildings on the site would result in the loss of their historic interest, as well as the loss of buildings that sit comfortably within the wider streetscene. The introduction of a five-storey building in this location is out of keeping with the relatively uniform character of the streetscene. This impact is not helped by the monolithic nature of the design, that appears cluttered in design, and use an overly large palette of materials. The building would therefore jar with a streetscene in which variation is generally achieved through more subtle changes in design and materials. The design would benefit from more meaningful subdivision, taking reference from the plot widths that defines the streetscene.
County Highways Dept.	Objection , serious concerns regarding the complete lack of dedicated parking. On-street parking would not be for the exclusive use of the development. There will need to be alterations to the existing Traffic regulation orders and the potential lowering of kerbs to allow for the loading of goods vehicles, the collection of refuse and recycling and possibly to aid the usage of a proposed mobility spaces. The loading bay be designated as a Good Vehicle Loading Bay, and such highway works would need to be controlled through a section 278 agreement. In order to support the application, we would look for the provision of some dedicated hotel visitor accommodation. Conditions for a Construction Management Plan, hours of deliveries and off-site highway mitigation works are recommended.
Environmental Health	No objection , conditions for odour impact assessment, air quality assessment and further acoustic assessment. Control mitigation with contamination report.
Natural England	No objection , mitigation of a Construction Environmental Management Plan, timings of noise disturbance development (such as piling works) to be time restricted to less sensitive periods, and provision of ecologically educational visitor information packs through planning conditions, to avoid adverse impacts upon Morecambe Bay and the various environmental designations of this.
Environment Agency	No objection , the development would be safe without exacerbating flood risk elsewhere if the proposed flood risk mitigation measures are implemented. A vertically sequential approach is adopted on-site, with flood resistance and resilience measures incorporated into the design of the ground floor. The proposed development must proceed in strict accordance with this Flood Risk Assessment (FRA) and the mitigation measures identified as it will form part of any subsequent planning approval. Finished floor levels should be as high as practicably possible to overcome the fact that the proposed development is at risk from climate change driven sea level rise over its lifetime.
Lead Local Flood Authority	No objection , subject to implementation of FRA measures, and details of a final surface water drainage scheme and its maintenance and verification, controlled through planning conditions.
Engineering Team	
Waste And Recycling	No observation received
Planning Policy Team	No observation received
Lancashire Constabulary	No observation received
United Utilities Water Plc	Concern regarding the lack of robust evidence that that the drainage hierarchy has been thoroughly investigated.
Fire Safety Officer	No observation received
County Active Travel	No observation received
RSPB	No observation received
Electricity North West Limited	No observation received
Property Services	No observation received

GMEU	No objection , subject to the implementation of mitigation measures within the submitted Habitats Regulation Assessment (HRA) and Bat Survey, through planning conditions.
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4.2 The following responses have been received within **objections** from **six** members of the public:

- Adverse impact upon existing long-standing businesses, forcing tenants and residents from properties.
- Loss of employment within existing businesses on-site, adverse financial implications, and financial impacts to neighbouring businesses during demolition/construction.
- No need for a new hotel, and preferable undeveloped sites for a new hotel.
- Existing terrace contributes to the towns identity and heritage.
- Adverse impacts upon existing overstretched parking provision, none provided within the proposal.
- Lack of consultation and engagement with developer.
- Noise, traffic and disturbance will be excessive and detrimentally harm neighbouring residential amenity.
- Increase traffic and associated carbon emissions and air quality impacts.
- An additional licenced premises and potential antisocial behaviour.
- Damage of demolition/construction to adjacent retained neighbouring properties within the terrace row.
- Devalue residential properties.

4.3 The following responses have been received within **responses and support** from **two** members of the public:

- Positive for Morecambe, provision of quality hotel space.
- Enhance the area and indicate investment in Morecambe.

5.0 Analysis

5.1 The key considerations in the assessment of this application are:

- Principle of development
- Design, scale and streetscene impact upon heritage assets
- Flood risk and drainage
- Transport, highways, parking and waste management
- Ecology, protected species and energy efficiency
- Residential amenity and contamination

5.2 **Principle of development** Development Management DPD Policies DM23 (Visitor Accommodation) and DM28 (Employment and Skills Plans), Strategic Policies and Land Allocations DPD Policies SP1 (Presumption in Favour of Sustainable Development), SP2 (Lancaster District Settlement Hierarchy), SP3 (Development Strategy for Lancaster District), SP4 (Priorities for Sustainable Economic Growth), EC5 (Regeneration Priority Areas) and TC4 (Central Morecambe), National Planning Policy Framework Section 2. (Achieving sustainable development), Section 4. (Decision-making), Section 6. (Building a strong, competitive economy), Section 7. (Ensuring the vitality of town centres) Morecambe Area Action Plan DPD Policies SP1. (Key Pedestrian Routes and Spaces), SP3. (Morecambe Main Seafront and Promenade), AS2. (Improve the condition of buildings and encourage beneficial occupancy), AS4. (Further encourage business investment and development) and AS15. (Visitor marketing strategy) and Employment and Skills SPD

5.2.1 Morecambe has been a long-standing regeneration priority for the Council, with a Morecambe Area Action Plan (MAAP) published just under a decade ago to encourage the regeneration of the area as the main regeneration priority within the district. This has included free pre-application advice to encourage development and investment in the area, which this application has benefitted from over the last year. The regeneration of Morecambe is of sub-regional importance, seek re-investment as a visitor destination through tourism, housing renewal and heritage led regeneration.

- 5.2.2 The social and economic perceptions of the town, which date back as far as the evolution in the tourism industry in the 1970s (but are by no means limited to that), have contributed to low levels of private investor confidence. Public sector-led investment in the town has been received favourably (such as the award-winning TERN Project of artworks along the Promenade; the coastal protection works and the public/private partnership which helped secure the restoration of the Midland Hotel). This has culminated more recently with the planning permission and circa £100 million investment sought for the Eden Project Morecambe at the nearby site, which is hopefully the catalyst for further regeneration and tourism offer in Morecambe, directing visitors and investment in this main regeneration priority area. The MAAP seeks to create opportunities to change the environment and visitor perceptions to create the right conditions for investment. This approach is fully consistent with the NPPF and the practice guidance, which states that *'Local planning authorities can take a leading role in promoting a positive vision for these areas, bringing together stakeholders and supporting sustainable economic and employment growth. They need to consider structural changes in the economy, in particular changes in shopping and leisure patterns and formats, the impact these are likely to have on individual town centres, and how the planning tools available to them can support necessary adaptation and change.'* (paragraph 001, PPG Town centres and retail).
- 5.2.3 The focus of the MAAP is regeneration, which becomes the starting point for planning decisions concerning central Morecambe and help guide investment decisions. Within the regeneration priority policy EC5.1 of the SPLA DPD and MAAP, these policies seek to secure appropriate development, including hotel accommodation. Whilst the Eden Project Morecambe permission occupies the majority of the MAAP DO2 development opportunity area, this is circa 70 metres west of the proposed development, and the DO2 specifically seeks additional visitor accommodation and other hotel accommodation beyond the iconic Midland Hotel. MAAP Action Set AS8 for sites behind the Winter Gardens, now largely occupied by a trampoline park, seeks similar appropriate development of hotel accommodation.
- 5.2.4 Whilst regeneration of Morecambe must be multifaceted, and Eden Project Morecambe will hopefully prove to be a catalyst for this, the tourism industry remains a key factor for investment and regeneration of the area. Integral to the regeneration plan and as identified in the MAAP is to secure more benefit from day visitors, by encouraging day visitors to move around more as pedestrians, stay longer and spend more. The proposed hotel accommodation, with ground floor retail and restaurant uses, is considered to align well with the aims and objections of this main regeneration priority area and associated goals. The proposal offers new additional and alternative visitor accommodation provision, which will help achieve the aim of converting more day visitors into staying visitors, coupled with attracting new visitors to stay, as sought by the MAAP and regeneration priority area policies.
- 5.2.5 Whilst the proposal clearly aligns with the regeneration priorities for Morecambe, there will undoubtedly be some adverse impacts, particularly in the short-term during demolition and construction. Furthermore, there are existing business and residential apartments within the buildings to be demolished to facilitate the proposed development. Some of these have already been relocated (such as the cycle store/repairs), but others remain on-site, who's businesses and lives will unfortunately be adversely impacted by having to relocate through this proposal. Undoubtedly there are larger degrees of adverse impacts upon those currently tenanted within the buildings. However, within the wider considerations of this main regeneration priority of sub-regional importance, and the associated economic and social benefits of investment in the area and encouraging greater and longer holiday visitors to the area, this is considered to carry significant positive weight in determining the application, and weighs as such in benefit of the proposal.
- 5.2.6 To ensure these benefits are delivered to the benefit of the local economy, and to ensure the economic benefits are delivered promptly following adverse impacts of demolition, planning conditions are recommended for an employment skills plan, to support local people sure experience and upskilling in the construction and design sector, and stipulating a contract for demolition shortly preceding the physical development of the remainder of the built form coming forwards within the same contract.
- 5.3 **Design, scale and streetscene impact upon heritage assets** Development Management DPD, DM29 (Key Design Principles), DM38 (Development affecting Conservation Areas), DM39 (The Setting of Designated Heritage Assets), DM41 (Development Affecting Non-Heritage Assets or their settings), DM46 (Development and Landscape Impact), and DM57 (Health and Wellbeing), Strategic

- 5.3.1 In accordance with the Listed Building and Conservation Areas Act, when considering any application that affects a Listed building, a Conservation Area or their setting, the local planning authority must pay special attention to the desirability of preserving or enhancing the character or appearance of the heritage asset or its setting. This is reiterated by policies DM37 and DM38. DM38 sets out that development within Conservation Areas will only be permitted where it has been demonstrated that:
- Proposals respect the character of the surrounding built form and its wider setting in terms of design, siting, scale, massing, height and the materials used; and,
 - Proposals will not result in the loss or alteration of features which contribute to the special character of the building and area; and,
 - Proposed uses are sympathetic and appropriate to the character of the existing building and will not result in any detrimental impact on the visual amenity and wider setting of the Conservation Area.
- 5.3.2 The application site is within a highly prominent and sensitive visual and heritage location. Development would be visible from key pedestrian route at close proximity, further along the promenade and Marine Road, and from beaches and the Bay in a location directly fronting Morecambe Bay. The site is within the Morecambe Conservation Area, within a terraced row bookended by positive buildings considered to form non-designated heritage assets. In addition to the designated conservation area, there are Listed Buildings that have settings extending to the application site due to the open nature of the promenade, particularly the Grade II* Listed Buildings of Midland Hotel and Victoria Pavilion (commonly referred to as the 'Winter Gardens').
- 5.3.3 The terraced row to which this application relates was originally developed shortly followed the earliest houses and guest houses to appear along the waterfront, and at the turn of the twentieth century this would have formed a continuous row of terraced properties with a rhythm and pattern of Victorian 2.5 storey properties. Unfortunately, the intervening century has seen a number of alterations, and retention of few original features, with the exception of those partially retained in the upper floor of two existing properties only in this row. The current architecture is mixed, with a variety of external materials, architectural designs and increased heights to 3 storeys with flatter roofs. As such, none of the buildings sought to be demolished within the development area individually nor cumulatively would be considered non-designated heritage assets. The condition of properties in the area was a point sought to be addressed within the MAAP, with an action set designed to improve the condition and external appearance of buildings and more beneficial use of commercial space, particularly within the 'View for Eric' area, including the application site. Whilst the scale and pattern of the various architecture presents a character in itself, due to the interventions during the twentieth century the impact of their loss on the historic feature to these properties within the conservation area and setting of listed buildings, the heritage impact of the demolition of these would be very low. The impact upon the nearer non-designated heritage asset bookends would be minor to moderate harm due to close proximity and relative scale/ height.
- 5.3.4 The proposed development is larger than the existing buildings to be replaced, creating a larger mass within the existing width of terrace to be demolished. The proposed development for Marine Road Central is up to 5 storeys tall, whereas the existing is largely 3 storeys, which is a point of concern for Historic England. Buildings fronting Marine Road are predominantly 3 storeys tall, with few exceptional buildings taller than this. The positive building at the east end of this terrace, and those opposite to Skipton Street, are 4 and 3.5 storeys. More notably, the Winter Gardens and the extended Midland Hotel are taller buildings, punctuating the streetscene as the most important and grand buildings in the vicinity, which should remain the case to ensure development does not detract from their importance.
- 5.3.5 To provide a hotel of this scale, 5 storey height is required due to the restriction in floor area, and the fact that holiday accommodation is to upper floors only to avoid flood risk (elaborated upon in following sections of this report). The top floor is set back from the frontage by over 3 metres in comparison to lower floors, helping to conceal the height of this smaller top floor. Two front

asymmetric gables are set further forward to the frontage, similar in height to the taller 3.5 storey bookend property. These are focused to the east of the frontage, although more modestly setback (0.3 metres) behind the lower three storey elements and differentiated by different materials, seeking pitched face natural sandstone to the lower three floors and standing seam grey cladding above to differentiate the height. This seeks to make the top of the sandstone elements appear as eave heights similar to the immediately adjoining retained properties either side of the proposed development. Whilst the predominant material is natural sandstone to the frontage and rear, the proposal seeks to break the 46 metre elevations into 5 blocks through differing heights of sandstone, alterations to windows and particularly ground floor frontages, projections of taller appearance sections and a change from pitch to smooth face natural sandstone.

- 5.3.6 Despite these architectural features and materials to break the appearance of the building both horizontally and vertically, Historic England have concerns (but not objection) with monolithic design as a single mass, not reflecting the grain and scale of existing frontages, also raising concerns with a cluttered design and large palette of materials, identifying adverse impact upon the Conservation Area (but not the setting of Listed Buildings). Concerns regarding the quality of materials have been addressed through amended plans for natural sandstone to front and rear elevations. High-quality external materials and details will be essential to the success of this design and scheme, details and samples of which can be controlled through planning condition. The precise details of these will be essential to achieving a successful scheme, not just the quality of materials to be congruent to the largely sandstone frontage as existing to Marine Road, but to differentiate the various aspects of the proposed frontage through alternating stone pitch, block sizes, and other detailing to be controlled through conditions for sample panels.
- 5.3.7 The proposal has been through an extensive pre-application process, involving members of the Planning Committee in addition to officers and heritage colleagues, in addition to external consultations with Historic England, Natural England, and Places Matter!, amongst others. Whilst a greater setback of the grey cladding area has been sought and only partially addressed through amendments, the proposal includes a number of subtle architectural details to achieve the intentions of the design outlined in the preceding paragraph. The development will almost certainly appear more prominent than the existing row of mixed properties, however with suitable details and high-quality materials and external appearance, it is considered that the proposal will successfully break the scale and massing into a development that will appear more proportionate to the streetscene, despite the overall dimensions of development.
- 5.3.8 The Local Authority Conservation Officer concludes that the scale, form and massing of the proposed hotel are sensitive to its surroundings, with the asymmetrical gables bringing a contemporary nod to the terraced buildings which it is to replace, and harm could be avoided by improving the material palette. Officers concur with this conclusion, and the material palette is considered to have improved since the Conservation Officer response, with natural sandstone, and external materials to be precisely controlled through planning conditions. Given the evolution of the architectural design, the taller rows of properties to the east of the development including the bookend building, and the fact that historically this would have formed a repeating terraced row of residences (albeit smaller in scale), the design and scale of development is considered to be appropriate for these reasons, despite the concerns of Conservation Area impacts raised by Historic England.
- 5.3.9 Some details of landscaping to the front of the property have been provided, and whilst full details would need to be controlled through conditions, this is considered to be a modest improvement to the existing front forecourts, which currently has various boundaries and surface materials. The development would appear taller to the rear due to reduced architectural detailing, although the principles of breaking the elevations and high-quality external materials apply to West View Road rear elevation too. These higher quality materials and cleaner appearance to the rear would offer modest improvements to this less sensitive vista of the Morecambe Conservation Area, primarily viewed from the public car park to the rear. With such modest benefits to the rear and front landscaping, the overall impact upon the Conservation Area is considered to be neutral, and the design avoids appearing monolithic nor competing with the Grade II* Listed Buildings. As such, there is considered to be no adverse impact upon the setting of the Midland Hotel and Winter Gardens, and Historic England raise no concern with these heritage assets in their response. The proposal will have a greater impact upon the non-designated heritage assets, particularly the eastern end terrace property, due to relative scale to this building and such close proximity, however, this is considered

to be moderate harm to this non-designated heritage asset's setting.

5.3.10 Overall there is considered to be no undue harm to designated heritage assets and their settings through amended materials and details to the development, and whilst the striking visual appearance of the development adjacent to the non-designated heritage assets and within the streetscene weighs moderately against the proposal, in a balanced judgement of this harm the significant weight attributed to the social, economic and investment benefits are considered outweigh the local moderate level harm.

5.4 **Flood risk and drainage** Development Management (DM) DPD policies DM33 (Development and Flood Risk), DM34 (Surface Water Run-off and Sustainable Drainage), DM35 (Water Supply and Waste Water), DM36 (Protecting Water Resources and Infrastructure), DM57 (Health and Wellbeing), and the Flood Risk Sequential Test and Exception Test Planning Advisory Note 6, Strategic Policies and Land Allocations (SPLA) DPD policy SP8 (Protecting the Natural Environment); National Planning Policy Framework (NPPF) Section 14. (Meeting the challenge of climate change, flooding and coastal change) and Planning Advice Notes PAN03 (Surface Water Drainage, Flood Risk Management and Watercourses) and PAN06 (Flood Risk Sequential Test and Exception Test)

5.4.1 The site is partially within Flood Zone 3 to the front forecourt and Flood Zone 2 to the rear section of the proposed building, at high and medium probability of river or sea flooding respectively. This is a high (1in30 year event) risk of surface water flooding to the rear, and a medium risk of groundwater flooding. The site as existing is at risk from multiple sources of flooding, albeit in close proximity to the recently refurbished flood defence wall to the sea. Whilst the proposed uses of the site present similar risks, primarily commercial to the ground floor and accommodation to upper floors, the proposal introduces a greater volume of visitor accommodation, exacerbating the number and degree of use considered to be more vulnerable to flood risk at this site.

5.4.2 The proposed development takes a similar approach to the existing uses, with a vertical sequential approach applied to the proposed development, placing more vulnerable hotel room accommodation to upper floors, and less vulnerable commercial aspects of the hotel, retail and restaurant to the ground floor. The first floor and all hotel rooms proposed are at a floor level of 11.01 AOD, 1.8 metres above the tidal event and freeboard level. The ground floor and less vulnerable uses, but including the accesses to the upper floors, are beneath this calculated <1in200 year event flood level. However, it is considered to be unfeasible and unpractical to have the ground floor level over 1.5 metres above Marine Road Central to achieve the flood and freeboard level to the ground floor, as this would have serious adverse impact in terms of streetscene and scale.

5.4.3 Matching the existing floor levels is considered to be as high as feasible, given the heritage sensitivities of the site and requirement to maintain and active streetscene. Other mitigation measures within the submitted Flood Risk Assessment (FRA) include water resistant floor finishes, low water penetration and good drying ability lower wall materials, services above 9.21 metres AOD, flood resilient lifts and flood proof doors/barriers up to 9.21 metres AOD height. Subject to these measures and their details being controlled through planning conditions, the application site is considered to be suitably flood resilient, with no objection from the Environment Agency.

5.4.4 The proposal has taken a vertical sequential approach to development, as opposed to looking at alternative sites for the hotel development. Given the contribution of the proposal to the main regeneration priority of Morecambe, and accordance with the investment and redevelopment principle within the MAAP, these could not be delivered by siting the development outside of Morecambe regeneration priority area. The improvements of business and condition of built form delivered through this proposal similarly could not be delivered at other sites. As such, the redevelopment, regeneration and investment benefits of the proposal cannot feasibly be delivered elsewhere. The flood risks are primarily external to the front of the proposed building, and skirt the rear of the proposed building, with large sections of the Morecambe sea front at similar or greater flood risk. Given the particular nature of the proposal and associated regeneration priority impacts of the rebuild of a prominent site on Marine Road Central, the vertical sequential test undertaken is considered to be appropriate in this instance, subject to the mitigation measures detailed within the FRA.

5.4.5 In terms of the exception test, the mitigation measures within the submitted FRA, combined with a

condition for a Flood Emergency Procedure plan, will ensure the development will be safe for its lifetime. Drainage arrangements through planning condition can ensure that flood risk will not be increased elsewhere, with the site forming an impermeable surface across the entire site as existing. The risk of flooding tidal events and 1in30 surface water flooding events affects small portions to the rear of the proposed building and external elements beyond. Whilst medium risk of groundwater flooding affects the wider area and entirety of the site, these risks are given moderate weight given the serious impacts that such flooding events have on businesses and residents, albeit temporary residents in holidaymakers in the case of this application. However, the economic and social benefits to the community of this proposal within the main regeneration priority area are considered to be significant, and outweigh the flood risk from the proposal.

5.4.6 Largely indicative information has been submitted regarding surface water drainage arrangements, with foul sewerage to connect to the mains. Attenuation for drainage is suggested within the front forecourt area, suggesting a 39.6sq.m volume attenuation to restrict a discharge rate to a maximum of 5l/s. Whilst existing flow rates are indicative, this is considered to be an appropriate rate for the proposed development. This information is indicative and not fully designed at this stage, but this information is sufficient to demonstrate that an acceptable scheme is achievable within the development area of the site. As such, subject to a full drainage scheme exploring the drainage hierarchy, providing the hierarchically most suitable option with a maximum discharge rate of 5l/s as part of full drainage detail, and maintenance and verification of this, drainage from the site through planning condition is considered to be appropriate to mitigate the impacts of the proposal and cause no increased flood risk elsewhere. Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate, which will need to be explored through a surface water drainage planning condition, to ensure the most appropriate drainage scheme is implemented through the proposed development.

5.5 **Transport, highways, parking and waste management** Development Management DPD DM29 (Key Design Principles), DM57 (Health and Well-being), DM61 (Walking and Cycling), DM62 (Vehicle Parking Provision), Appendix E (Car Parking Standards), Strategic Policies and Land Allocations DPD Policy T2 Cycling and Walking Network, National Planning Policy Framework Section 9. (Promoting sustainable transport) Morecambe Area Action Plan DPD Policy AS11. Transport, parking provision and management, and Planning Advice Notes PAN01 (Waste Storage and Collection Guidance for Domestic and Commercial Developments) and PAN08 (Cycling and Walking)

5.5.1 The proposed development is within the sustainable location of Morecambe, accessible via train and bus with nearby local stations for both. The site is also on national and regional walking and cycling routes, notably the Lancashire Coastal Way long distance walk, and cycle routes for Way of the Roses and Bay Cycleway. The site is well connected to Lancaster, Heysham and to Caton through sustainable transport means, providing connections to wider locations on the West Coast Mainline railway from Lancaster and ferry to the Isle of Man from Heysham. Whilst holidaymakers have more recently tended to visit Morecambe on day trips, the facilities in and immediately around Morecambe can be accessed on foot, by bicycle or via public transport in sustainable modes of travel. To encourage sustainable transport further, the proposal includes an 18.9sq.m bike store within the development, details of which should be controlled through planning condition to ensure appropriate details and delivery of this to encourage sustainable travel for employees and future visitors staying at the proposed hotel.

5.5.2 The submitted Transport Statement concludes that the proposal will not generate any additional parking demand. Whilst the proposed development would potentially accommodate daytrips to stay longer, and existing business and uses within the site will have some transport impacts, it is considered that an 86-bedroom hotel plus a restaurant and retail unit in this location would have some additional impact upon parking requirements. County Highways raise concerns regarding the lack of any dedicated parking as part of this proposal.

5.5.3 Many city and town centre hotels do not include parking on-site, particularly in larger urban centres; this is also found to be the case at the new hotel development in Lancaster on Spring Garden Steet onto the A6 gyratory road, and on the corner of Central Drive and Euston Road in Morecambe, neither of which benefit from dedicated parking provision. Whilst the conclusions and assertions in the Transport Statement are not entirely agreed with, the lack of parking at the site would influence transport choices of occupants, making public and sustainable transport a more attractive option due

to the additional cost of parking. Whilst some free on-street parking is available in Morecambe, this is often limited availability at peak times, but there is good availability of public car parks in the immediate vicinity, particularly at West View carpark to the immediate rear south of the site. This 78-space long stay carpark has recently been refurbished and resurfaced, with electric vehicle charging points provided. Whilst only a snapshot in time, during the site visit on a Friday late afternoon in August (school holiday season), availability of spaces within this car park was ample, and Telephone Exchange long stay carpark of 159 spaces is a short distance further south and tends to also have good availability of spaces.

5.5.4 Whilst the concerns of County Highways are understandable, there are very few properties in the vicinity benefitting from their own dedicated parking spaces, the notable exception being the Midland Hotel. A lack of parking would hopefully influence travel choices of holidaymakers and occupants to more sustainable methods, or carpooling if travelling as a larger group. There is not an indefinite supply of parking within Morecambe, particularly with extant consent for Eden Project Morecambe. However, given the nature of the use and location in proximity to a number of public transport and alternative parking options, it is considered that the proposal would have no severe adverse impact upon the local highway network or parking provision in the vicinity, despite the likely increase in demand for existing parking facilities.

5.5.5 Off-site highway works are suggested in the form of mobility parking bays and a loading bay. It should be noted that neither would be for the sole or dedicated use of the proposal, being part of the public highway rather than their private land, but this would offer some restrictions in use that would be beneficial to wider commercial uses in the area and mitigate impacts of the proposal upon the highway. There would need to be alterations to the existing Traffic regulation orders and the likely lowering of kerbs to allow for the loading of goods vehicles (as a dedicated Goods Vehicle Loading Bay), the collection of refuse and recycling and possibly to aid the usage of a proposed mobility spaces these works. Such works would need to be controlled through planning condition, and delivered through a Section 278 agreement with County Highways. Subject to such a condition, the proposed development and use is considered to be acceptable, and would have no severe adverse impact upon the local highway network or parking provision.

5.5.6 The greater level of highway impact would likely be during demolition and construction, when heavier vehicles would more frequently visit the site during this period. These impacts can be mitigated through appropriate arrangements within a demolition and construction management plan, which should be controlled through planning conditions prior to any developments on-site. During use, waste bins are sought to be stored within the building to the rear West View Road. It is unclear whether collections would be made to the front or from the rear, however subject to waste bins being stored internally within the site, and not on the public pavement, except for on collection days, these arrangements are considered to be acceptable.

5.6 **Ecology, protected species and energy efficiency** Development Management DPD policies DM30 (Sustainable Design), DM36 (Protecting Water Resources and Infrastructure), DM44 (Protection and Enhancement of Biodiversity) and DM57 (Health and Wellbeing), Strategic Policies and Land Allocations DPD policy SP8 (Protecting the Natural Environment) and EN7 (Environmentally Important Areas), National Planning Policy Framework Section 15 (Conserving and enhancing the natural environment) and Planning Advice Note PAN09 (Energy Efficiency in New Development)

5.6.1 The vast majority of the site is developed land and sealed surfaces, and other than potential impacts to bats, the ecological value of the site as existing is negligible. Most of the existing vegetation immediately beyond the site are roadside trees and managed urban landscaping, considered to have very low suitability for foraging and commuting bats within the submitted Bat Survey. Buildings within the site are considered to provide low potential for roosting bats, but no emerging bats were recorded during a dusk survey, with very low activity levels. Mitigation measures during demolition works are proposed within the submitted Bat Survey, including demolition practices, avoiding night construction, artificial light spill, sensitive lighting external lighting following construction, and bat boxes mounted or incorporated into external walls. Subject to these recommended mitigation measures being implemented and controlled through planning conditions, the proposal is considered to have no adverse impact upon protected species. In addition to the planting of additional trees and vegetation within the front forecourt area, to be controlled through planning condition, the proposal is considered to be acceptable in terms of habitat creation and protected species.

- 5.6.2 The application site is in very close proximity to Morecambe Bay, which is very important for many species of birds. As such, there is the potential for development and recreational use close to the designated sites to have impacts on birds associated with the SPA, SSSI and Ramsar designations. It is considered that these impacts could be avoided, but only through mitigation. In light of the People Over Wind ruling by the Court of Justice of the European Union, likely significant affects cannot be ruled out without mitigation and therefore an Appropriate Assessment (AA) is required. This is contained within a separate document and concludes that, with the implementation and retention, where appropriate, of mitigation the development will have no adverse effects on the integrity of the designated sites, their designation features or their conservation objectives, through either direct or indirect impacts either alone or in-combination with other plans and projects. Subject to the implementation of the mitigation measures within the AA, namely for appropriate construction and environmental management practices and procedures, to be controlled through a Construction Environmental Management Plan (CEMP), and specifically detailing appropriate timing restriction for high noise disturbance works such as piling, and visitor information packs including details of adjacent designated sites and alternative for recreation to mitigate such recreation pressure, the proposal is considered to have an acceptable impact upon the environment, habitats and protected species and sites. Subject to these planning conditions, the proposal is considered to adequately mitigate the impacts upon ecology and risk of contamination, compliant with relevant policies, with no objection from Natural England.
- 5.6.3 To facilitate the proposed development to function largely as a hotel, in addition to ground floor restaurant and retail, the proposed would see the demolition of existing buildings. This has an obvious adverse impact in terms of embodied carbon, not just those made redundant through demolished materials, but also the CO2 emitted producing the materials for the new development itself. In terms of mitigation, the proposed will include well insulated walls, highly efficient glazing and rooftop solar panels. The efficiency specifications of the fabric components, and mitigation measures within ventilation, cooling and lighting within the proposal should be controlled through condition, in addition to achieving BREEAM excellent level as proposed, with details of solar panel submitted through planning condition. Subject to these measures, the proposal is considered to mitigate the impacts of the development upon embodied carbon, and ensure carbon savings over the lifetime of the development.
- 5.7 **Residential amenity and contamination** Development Management DPD Policies DM29 (Key Design Principles), DM32 (Contaminated Land) and DM36 (Protecting Water Resources and Infrastructure), and National Planning Policy Framework Section 8. Promoting healthy and safe communities
- 5.7.1 Similar to the proposal, the properties in the vicinity and fronting the bay are almost entirely commercial at ground floor level, but upper floors are a mix of commercial and residential. There is an existing noise environment from this location and associated activity of commercial and leisure properties, including existing cafés, restaurants and public houses in the vicinity. Whilst the submitted Noise Assessment focuses on amenity standards for hotel occupants, these seek to achieve the same standards expected for residential properties. The mitigation suggested includes standards double glazing combined with trickle vents to habitable rooms combined with mechanical ventilation. These mitigation measures can be controlled through planning conditions, and trickle vents would be subject to external materials also, to ensure these are appropriate to the heritage setting, such as concealed vents. Further mitigation is required for the rooftop plant machinery, limited to 50db LAeq, T during the day and 34db LAeq, T at night. The cumulative impacts of this should be submitted and assessed through planning condition, in addition to mitigation through construction practices controlled through planning conditions.
- 5.7.2 The proposal includes a ground floor restaurant and commercial kitchen, however no details of extraction or odour form part of this submission. As such, an odour impact assessment should form a pre-commencement planning condition to ensure impacts are appropriately mitigated through a design known prior to any demolition or construction, as recommended in the Environmental Health consultation response, to ensure no adverse impact upon residential amenity. This consultation response also details air quality within the external seating area, however given this is optional for patrons, as is any other external seating in the vicinity, combined with the location outside any air quality management area, the proposal is considered to be acceptable without mitigation in terms of air quality.

5.7.3 The application site is at low risk in terms of contamination, although high risk of radon. The submitted Phase 1 Environmental Site Assessment Report includes mitigation measures of suitable personal protective equipment (PPE) and Health and Safety procedures during construction, and incorporation of full radon protective measures in accordance with relevant building control guidance. These measures can be controlled through planning condition to ensure no adverse impact of contamination from the site and proposed development. Whilst the height to the rear is circa 1.5 metres taller than the frontage due to changes in land levels between the front and the rear, the maximum height above the ground level rounds up to 17.2 metres. This is beneath the 18 metres height for relevant buildings requiring a fire statement. Whilst no consultation response has been received from the Fire Safety Officer, the appears to be a fire hydrant grid, and space from the carpark to the south to operate fire safety equipment, which is considered to be acceptable and raises no safety concerns for a building of this scale.

6.0 Conclusion and Planning Balance

6.1 The proposed development seeks to provide significant investment and economic contribution to the tourism economy in Morecambe, redeveloping and creating beneficial use of this commercial space in a key location fronting the Bay. The proposal will achieve a number of objectives and action sets within the MAAP, seeking to delivery regeneration within this main priority area for regeneration, delivering significant economic and social benefits. Whilst large in scale, subject to precise details and samples of high-quality external materials and landscaping, the carefully considered design and architectural details are considered to limit heritage harm to non-designated local heritage assets, which is afforded modest weight. No harm has been identified to the national heritage asset Conservation Area or setting of Listed Buildings, such as the iconic Midland Hotel and Winter Gardens. Other material planning considerations of transport and highway impacts, ecology, contamination, residential amenity, embodied carbon and drainage can all be controlled through planning condition to ensure neutral impact. The aforementioned benefits of development outweigh the moderate harm from risk of flooding, which is reduced through flood resilient design measures within the development, considered to pass the sequential and exceptions tests.

6.2 Whilst there are unfortunate impacts to existing occupants and tenants of the buildings to be demolished, and the property will have an impact on an non-designated heritage asset, the avoidance of wider or greater heritage impacts through the proposal evolved substantially through the extensive pre-application process ensures that the economic and social benefits of this level of investment within Morecambe outweigh this identified harm and any flood risk harm to the mitigated development. As such, and subject to planning conditions to ensure high quality of development in this locally and regionally important location, it is recommended that consent is granted.

Recommendation

That Planning Permission BE GRANTED subject to the following conditions:

Condition no.	Description	Type
1	Time Limit (3 years)	Control
2	Accord with amended plans	Control
3	Scheme for contractual arrangements for demolition shortly preceding the physical development	Pre-commencement
4	Demolition and construction management plan	Pre-commencement
5	Demolition and construction environmental management plan (including timings for high noise disturbance works, such as piling)	Pre-commencement
6	Employment Skills Plan	Pre-commencement
7	Surface Water Sustainable Drainage Strategy	Pre-commencement
8	Sustainable Drainage System Operation and Maintenance	Pre-commencement
9	Bat boxes details	Pre-commencement
10	Flood risk assessment mitigation	Pre-commencement
11	Details and samples of external materials (including natural	Pre-commencement of

	stone walls sample panels, metal cladding, plant compound, glazing, ventilation, external doors, rainwater goods)	external works
12	Flood Emergency Procedure plan	Pre-occupation
13	Verification Report of Constructed Sustainable Drainage System	Pre-occupation
14	Cumulative noise emissions assessment from proposed plant and external equipment	Pre-installation and pre-occupation
15	Odour impact assessment and extraction details	Pre-installation and pre-occupation
16	Bicycle storage details	Pre-occupation
17	Off-site highway works (mobility parking and goods vehicle loading bays)	Pre-occupation
18	Visitor information packs – HRA mitigation	Pre-occupation
19	Landscaping scheme to front forecourt	Pre-occupation
20	Solar panel details	Pre-installation of solar panel
21	External lighting spill plan	Pre-installation of external lighting
22	Energy measures and BREEAM excellent rating	Control
23	Noise mitigation measures	Control
24	Bat survey mitigation measures	Control
25	Contamination report measures	Control
26	Bins stored on-site except collection days	Control

Article 35, Town and Country Planning (Development Management Procedure) (England) Order 2015

Officers have made this recommendation in a positive and proactive way to foster the delivery of sustainable development, working proactively with the applicant to secure development that improves the economic, social and environmental conditions of the area. The recommendation has been taken having had regard to the impact of development, and in particular to the relevant policies contained in the Development Plan, as presented in full in the officer report, and to all relevant material planning considerations, including the National Planning Policy Framework, National Planning Practice Guidance and relevant Supplementary Planning Documents/ Guidance.

Background Papers

None