

Agenda Item	A5
Application Number	21/01113/FUL
Proposal	Demolition of existing buildings and proposed construction of major mixed leisure development in association with Eden Project (including use classes E, F1 and F2), outdoor arena (including live music performances), public realm, landscaping works, cycle parking, detached shelter and energy pods, and associated infrastructure and engineering operations
Application site	Central Promenade Regeneration Site Marine Road Central Morecambe Lancashire
Applicant	Eden Project International Limited
Agent	Mr Daniel Jackson
Case Officer	Mrs Jennifer Rehman
Departure	No
Summary of Recommendation	Approval (subject to Section 106)

(i) Procedural Matters

The submitted development proposals have been the subject of two years of pre-application engagement with the local planning authority, including a Councillor Engagement Forum (14 July 2021). On the advice of the Planning & Place Service, the applicant has also undertaken pre-application engagement with statutory consultees particularly in relation to ecology, cultural heritage, and transportation matters. A committee site visit took place on Monday 24th January.

1.0 Application Site and Setting

1.1 The application site covers approximately 4.6 hectares of predominately previously developed land on the central promenade site in Morecambe, situated to the north and west of Morecambe Town Centre. It is located around 300m from Morecambe Railway Station and slightly less to the bus station on Central Drive. The site itself comprises the former Bubbles Leisure Complex and SuperDome attraction site and the adjoining northern and southern sections of existing promenade, the Promenade Gardens (excluding the War Memorial Garden), the access route between the site and the Midland Hotel (to the west), open space in the north-western part of the site (location of the former bandstand) and the Bay Arena car park to the east. The areas of open space are designated as area of amenity greenspace (including outdoor events) and memorial gardens.

1.2 The main development is bound to the north, east, and north-west by the foreshore of Morecambe Bay and its existing flood defences (the site includes the promenade itself but not the outer wall/boundary of the promenade), the Midland Hotel to the south western boundary and Marine Road Central along the southern boundary of the site. The RNLI station lies immediately north of the site adjoining the promenade. The Stone Jetty extends out from the promenade to the north west of the site. There are no formal Public Rights of Way within or around the development site.

The promenade is, however, a well-pedestrianised, traffic-free corridor that extends from Hest Bank to Heysham. At the eastern end of the site, the promenade splits into two sections as it diverges around the former Bubbles site, resulting in a northern promenade and southern promenade around and within the development site. These two sections of promenade support existing cycle routes - Sustrans Route 69 (Way or the Roses) to the south and route 700 to the north.

- 1.3 The site is situated immediately north and north west of Morecambe Town Centre, separated only by Marine Road Central, and is located within Morecambe's Conservation Area. Several significant designated heritage assets surround the site. These include the Grade II* listed Midland Hotel to the west (and its separately listed Grade II walls/pillars), the Grade II* Winter Gardens and Grade II listed War Memorial immediately south of the site, The Platform (Grade II listed) to the south-west and the Grade II listed Stone Jetty building to the north-west. Surrounding uses include retail and leisure uses, entertainment venues such as the Winter Gardens and The Platform, visitor accommodation (Midland Hotel), the Festival Market and public realm and car parks serving the wider town.

2.0 Proposal

- 2.1 Eden Project International Limited (EPIL), the applicant, is a wholly-owned subsidiary of the Eden Trust, a UK-registered charity. It is an educational charity and social enterprise with a global mission to create and build relationships between people and the natural world to demonstrate the power of working together for the benefit of all living things. The Eden Project was founded twenty years ago when Eden Project (Cornwall) was realised. Its success, together with EPIL's own global mission to to raise awareness of the natural world, educate and empower communities, to explore the interconnectedness of all living things and to demonstrate the power of what people can do when they come together to project the plant, means EPIL are now developing several projects nationally and internationally. Eden's mission is to create a movement that builds positive relationships between people and the natural world to sustain a better future for all. Amid a global climate crisis, their mission, and their projects, provides huge opportunity to deliver transformational behavioural change and to promote the value and importance of regenerative sustainability.

- 2.2 EPIL have chosen to develop in Morecambe because of its unique environmental characteristics. The natural environment in and around Morecambe Bay is internationally significant, and the views across Morecambe Bay are amongst the finest in the country. Yet the town itself has experienced periods of significant social and economic decline. Eden Project North (EPN) proposes a flagship project, which has a vision to regenerate and re-imagine Morecambe as a seaside resort for the 21st Century. This project has far-reaching environmental, social, and economic ambitions. At its heart is an aim to drive regenerative sustainability to deliver positive change for the local community and the local economy. The objectives of EPN will also align with Morecambe's motto of 'Beauty Surrounds and Health Abounds', recognising the importance of enhancing wellbeing.

- 2.3 The proposed development comprises a major new mixed-use attraction in Morecambe. It will combine a range of indoor and outdoor experiences all based on connecting people with Morecambe Bay. The vision focusses on natural rhythms, such as tidal rhythms and lunar rhythms, and how they underpin the health and wellbeing of people and the natural environment. The development is based on three core venues within the attraction. This includes:-

- Above the Bay: an environment filled with plants and art exhibits, showcasing natural abundance and the rhythms of life linked to the sun.
- Below the Bay: an immersive series of theatrical experiences that bring to life lunar rhythms and tides, and the;
- The Natural Observatory: the home of EPNs research and education programmes.

Within these venues, there will be a range of uses that fall within a combination of Use Class E (commercial, business and service use), Class F1 (learning and on-residential institutions) and Class F2 (local community uses). The outdoor arena does not fall within any specific use class of its own (in the Town and Country Planning (Use Classes) Order 1987 (as amended)). Collectively, the planning unit as a whole, would be constitute a mixed-use scheme (therefore *Sui-Generis*).

- 2.4 EPN will be a ticketed visitor attraction including a mix of entertainment and educational facilities provided within four large shell-like superstructures, connected to the ground by a lower structure that wraps around the building, and enhanced by areas of high-quality open space and landscaping.

It will include exhibits, performance space, learning, play and immersive experiences within the development, alongside three café/restaurants, a visitor centre and ancillary retail. EPIL have applied for full planning permission for this development and have ambitions to be open in 2024 with a build period of 2 years. EPN aims to attract 1 million visitors (maximum) per annum with an estimated average of 760,000 per annum. The development is designed to accommodate 4000 visitors per day with a maximum of 750 visitors per hour accessing the site at peak times. The proposed development will directly employ around 390 full time equivalent employees with a maximum of 280 employees on site at any given time. It is anticipated that the maximum core hours of operation of the main site will be between 09:00-21:00 hours daily (outside summer periods), extending to 09:00-00:00 during summer. In addition to the main venue, a maximum 6000-person capacity outdoor arena is included in the proposals. It is proposed that up to 8 late-evening events per calendar year (during summer only) would take place between the hours of 18:00-00:00.

2.5 The proposed development includes the demolition of a sub-station, old pump house, electricity boxes, disused public conveniences, removal of two of the existing concrete seating alcoves on the promenade side, external stairs and part of the concrete amphitheatre. The development layout and form has evolved and been inspired by nature, its context and biophilic design (a concept used within the building industry to connect people with the natural environment). The redevelopment of the site comprises the erection of four shell-like superstructures ('the shell pavilions') with connecting structures and landscaping all influenced by the Bay. In support of the UK's Net Zero commitment by 2050, the project is working towards being a Net Zero Carbon building. The buildings will provide a Gross Internal Area (GIA) of 17,186m² across three levels. The shell pavilions vary in scale, form and height.

2.6 Details of the shell pavilions are as follows:

- **The Bay Hall** (800sqm) providing exhibition space and visitor orientation space (flexible space and a base for guided activities/trails etc). The building height is set at 23.7m Above Ordnance Datum level (AOD). The Bay Hall visitor space is a single floor at ground floor level with plant, staff facilities and offices and retail back of house space at basement level.
- **The Rhythm Machine** (5135 sqm) providing the 'Above and Bay' and 'Below the Bay' experiences. This will include, for example, a hyper-real forest along with other large installations and sculptures and an immersive theatre representing lunar rhythms. The building height is set at 36.9m AOD. This building extends vertically across all three floors.
- **The Natural Observatory** (1187sqm) offering the main education/research and engagement space with seasonable programmes. The building height is set at 25.9m AOD with the observatory based at first floor level and exhibition/seasonable programme space at lower ground level, together with the further plant facilities.
- **The Bay Glade** (2150sqm) shall provide an indoor landscape with a focus on wellbeing. The building height is set at 31.3m AOD with the visitor attraction located over ground and first floor levels.

The three levels are set at the following elevations and respond to the existing topography of the site:

- Lower ground level 3.5m-4.5m AOD
- Ground floor level set at 7.22m-8.5m AOD (level with the promenade)
- First floor level set at 11.72m-12.72m AOD.

An outdoor garden at the lower ground floor level provides a centrepiece to the cluster of the shell pavilions.

2.7 The building component which connects the shell pavilions is designed to provide a dunescape character and appearance, with an undulating roof formation supporting a range of coastal vegetation (green roofing). This space provides accessible and inclusive circulation space enabling visitors to navigate between the attraction and its various components. It includes the visitor centre, café and retail elements (the entrance), as well as back of house facilities and services such as

offices, storage, staff facilities, plant and servicing space. These spaces have also been utilised throughout the development to provide vertical circulation for both service use and for visitors. This comprises a combination of ramps (at suitable gradients), staircases and steps, such as the existing amphitheatre steps within the Rhythm Machine building, and service and visitors lifts.

- 2.8 The proposed public realm to the south of the buildings will remain publicly accessible, as will the northern promenade. The proposed gardens to the east and west of the shell pavilions (referred to as the Tide Gardens and Rhythm Gardens) are within the paid boundary of the attraction and will be segregated from public space through a combination of landscaping (raised earth embankment – referred to as the Northern Coastal Edge) and sensitive boundary treatments.
- 2.9 The shell pavilions are proposed to be a light-weight, grid structure constructed utilising an engineered timber (or alternative material subject to engineering design) and lightweight cladding (Ethylene tetrachloroethylene ETFE) with different opacity levels. The ETFE cladding has been chosen as it is highly tolerable to corrosion, highly energy efficient and can tolerate a wide range of temperatures. The arrangement and pattern of the timber grid and ETFE cushions are not provided in detail at this stage. To some elevations, organic photovoltaic film cells will be integrated into the ETFE cladding.
- 2.10 The walls supporting the dunescape roof will be finished in a combination of curtain glazing and recycled seashell and stone across the ground and first floors to all facades. At the entrance and at the first floor restaurants/cafes, the dunescape roof shall extend beyond the building facades to provide shelter and covered external spaces. In addition to the above, to the northern façade (facing the sea) supports a combination of natural stone retaining structures (at lower level) and gabion retaining wall systems designed to hold an engineered earth/vegetated embankment rising from promenade level up to approximately 12m AOD. It is proposed that a series of sheltered, scalloped seating areas shall be cut into this retaining structure (replacing two existing circular seating areas) that shall be accessed from the promenade. A series of raised deck areas and an elevated walkway run along the northern façade, parallel to the promenade.
- 2.11 In addition to the main built development on the site, the proposal also includes seven substantially smaller cylindrical structures (5 metres high) with varying diameters, located to the south of the main development. These are described as ‘Energy Pods’ and will house necessary energy-related infrastructure as well as supporting cycle parking provision and seating and will be vertically clad in timber. These structures will be connected by a glazed/timber “sea-foam” canopy (at 3 metres high), incorporating solar panels. The canopy also provides a sheltered route between drop off/pick up points on Marine Road Central and the attraction itself. The Energy Pods form part of a landscaped area described as the ‘Energy Field’. This multifunctional landscaped space is designed to tell the story about the projects regenerative design and sustainability and offers a range of seating areas and natural play for visitors and the public. This space could also incorporate Energy Art installations and other temporary and interchangeable features to express and support the project’s wider concepts and objectives.
- 2.12 The proposal also includes extensive landscaping and public realm that will be influenced by the Bay environment and are designed to be functional, flexible, accessible (providing an attractive and safe access/egress into the venue), and playful. There are a number of decked areas incorporated within the landscaped areas offering terraces to compliment the proposed restaurants as well as basking areas. The landscaped areas are equally designed to enhance biodiversity and manage surface water. The Rhythm Gardens will provide flexible space to accommodate large outdoor events during the summer period.
- 2.13 The development does not provide any parking on site. This will be provided off-site and will utilise existing town centre car parks and the Park and Ride (P&R) site at J34 of the M6 motorway. Subsequently, access will primarily be provided on foot (or by cycle) via enhanced public realm located to the south of the buildings along the southern promenade and off Marine Road Central. All existing pedestrian and cycle routes will be retained. The proposal includes off-site highway improvement works to enhance pedestrian crossing facilities between the site and the Goods Yard Car park (across Marine Road Central), together with proposals to provide coach drop off and pick up points (also for the Park and Ride Shuttle bus). There will be secondary access points provided via the venue gardens and landscape areas along the northern boundary. Goods and servicing to the attraction will be provided in a controlled manner utilising the southern promenade and northern

promenade, though the principal servicing areas are located to the northern side of the development. The existing route between the development site and the Midland Hotel to the west will be enhanced as part of the landscaping. It is proposed that this route will be included as a service route with automated bollards. This also offers an alternative route for emergency vehicles and the RNLI requiring access to the north of the site and the Stone Jetty. A series of proposed flood gates will also be required and shall be integrated into the design of the development.

2.14 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the ‘Regulations’) specifies that certain types of development require an Environmental Impact Assessment (EIA) to be undertaken. The proposed development falls within Schedule 3 of the Regulations and is therefore accompanied by an Environmental Statement (ES) which sets out the findings of the full EIA. The proposed development was therefore the subject of a formal scoping exercise and subsequent addendum to identify the likely significant environmental effects that might arise from the construction and operational phases of development. The ES has been undertaken in accordance with the accepted methodologies. The ES, together with consideration of reasonable alternatives and cumulative effects, considers the following topics in accordance and agreed methodology and significance criteria:

- Townscape, Seascape and Visual Impacts Assessment,
- Cultural Heritage,
- Nature Conservation and Biodiversity,
- Ground Conditions and Geology
- Hydrology, Drainage and Flood Risk
- Traffic, Transport and Access
- Noise and Vibration
- Air Quality
- Daylight, Sunlight, Overshadowing and Wind Microclimate
- Socio-economics
- Pollution and Human Health

3.0 Site History

3.1 The site has a long and colourful history. In the 1840’s Morecambe Harbour was constructed by the Little North Western Railway Company. This included the existing stone jetty and several railway lines and sidings. The building at the end of the Stone Jetty was the railway terminus station built in 1853, with the adjacent lighthouse added shortly afterwards.

3.2 The original Midland Hotel was built in 1847, known as the North Western Hotel and designed by Edmund Sharpe and EG Paley of Lancaster. Following construction of the Heysham Harbour, which opened in 1904, Morecambe Harbour closed and all railway infrastructure with the exception of one rail siding was removed from the site. The land was then leased by the Midland Railway to the Wards of Sheffield as a ship-breaking yard, and the site witnessed the dismantling of transatlantic liners. This lease ran until 1931. Ten years earlier the War Memorial Gardens had been officially opened on the site.

3.3 A scheme to ‘*Brighten the Promenade*’ was commenced in 1931 and the new Midland Hotel and the Harbour Band Arena was opened two years later. The ‘Super Swimming Stadium’ followed in 1935 and operated for 40 years until its closure in 1975.

3.4 The decline of the British seaside resort, predominantly due to the increased availability and popularity of package holidays elsewhere in Europe contributed to a decline in fortunes for Morecambe, and the length of the Promenade in particular. Attempts to maintain vitality in the resort and a continued focus on tourism and leisure uses included the outdoor swimming pool, the ‘Bubbles’ Complex and the Superdome. This complex was cleared in 2001.

3.5 Around 2004 Urban Splash acquired the Midland Hotel, which was successfully renovated to a high standard and was opened in 2008. In 2007, Urban Splash had further ambitious proposals and submitted an outline planning application for comprehensive redevelopment of the Central Promenade site, along with a full application for phase 1. Whilst the proposals as a whole were welcomed and would have provided a step-change for the site and would have continued wider

rejuvenation of town, the viability of the scheme demonstrated the whole scheme was not deliverable. This was largely a consequence of the economic downturn at the time. Delivering the proposals over phases or part delivery would not have delivered the wider public benefits to justify harm against the designated heritage assets affected. A second reason for refusal related to the failure of the applicant to satisfactorily reassure the local planning authority that the development and the car parking at the site would not lead to unacceptable highway conditions, notably traffic congestion/queue lengths on Marine Road Central. Consequently, the outline application was refused and the full application withdrawn.

- 3.6 EPIL commenced discussions with the local planning authority in 2019. Since then there has been extensive pre-planning application discussions with officers, consultees and the wider local community. This has included a Councillor Engagement Forum as well as a formal Scoping Opinion pursuant to the EIA Regulations. The table below provides a summary of the key planning applications relevant to this site.

Application Number	Proposal	Decision
07/01810/OUT	Outline application for the redevelopment of Morecambe central promenade including retail, leisure, restaurants, cafes, commercial and creche use (A1, A2, A3, A4, A5, B1, D1, D2) at ground floor level with residential and hotel accommodation (C1, C3) above. Extensive public realm works include a new setting for the midland hotel, seaside square, a boardwalk and market square	Refused
07/01811/FUL	First phase of development for Morecambe Central Promenade including retail, leisure, restaurants, cafes, commercial and creche use (A1, A2, A3, A4, A5, B1, D1) at ground floor level with residential accommodation (C3) above. Landscaped courtyards over parking. Public realm works including seaside square and landscaping works to adjacent to the Midland Hotel	Withdrawn
19/00758/EIO	EIA Scoping request for the demolition of existing buildings/structures and proposed construction of major mixed use leisure development in association with Eden Project (including use classes A1, A3, A4, B1, D1, D2 and Sui Generis) including public realm, landscaping, car parking and associated engineering works	Completed
21/00988/EIO	Addendum Report - EIA Scoping Opinion request for the demolition of existing buildings/structures and proposed construction of major mixed use leisure development in association with Eden Project (including use classes E, F1, F2 and Sui-Generis) including public realm, landscaping, car parking and associated infrastructure and engineering works	Application received before completed.

4.0 Consultation Responses

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

Consultee	Response
Lancashire County Council (as Local Highway Authority (LHA))	<p>Following the submission of Further Information, the LHA has no objection to the proposal, subject to the following conditions:</p> <ul style="list-style-type: none"> Off-site highway improvement works to secure enhanced pedestrian crossing facilities on Marine Road Central (in accordance with the details set out in the application) in addition to provision of coach/bus drop off and pick up points. In addition, details of separate formal cycle provision will be provided over Marine Road Central connecting to the Green Link. Traffic and Parking Management Plan for large events to be conditioned.

	<ul style="list-style-type: none"> • Highway mitigation scheme including revalidation of the MOVA signal technology at junction 34, M6 and minor improvements to the Shrimp roundabout (both to mitigate against impacts on junction capacity). • Provision of cycle parking spaces. • Signing strategy. • Car Park Management Strategy. • Goods and Servicing Strategy. • Construction Method Statement including phasing plan. • Traffic Management Plan (during construction). • Lighting screened from view of drivers on public highway. • Retaining structures require technical approval from Lancashire County Council. • Provision of Full Travel Plan. <p>The LHA seek a planning obligation for the following:</p> <ul style="list-style-type: none"> • Travel Plan Contribution (£10,000) to provide advice and guidance on Travel Plan development. • Monitoring on-street impacts of the development. On street parking survey to understand baseline conditions and repeat survey within 12months of opening and 1 year after (up to 3 in total). This links to the EDEN travel plan. EDEN to organise/fund and agree coverage and details of survey with Lancashire County Council. • Legal agreements between EPIL and Lancaster City Council and EPIL and Lancashire County Council to secure the identified off-site parking for the lifetime of the development. • Legal agreement to provide sufficient shuttle bus services between the Park and Ride site and the attraction. • Legal agreement between Lancaster City Council to influence pricing structure to visit the attraction to best influence site sustainability and modal choice. • A Parking Strategy is required to secure the off-site parking (figures as set out in the application) and the implementation, management and enforcement of such, together with details of the ticketing (the advanced dynamic booking system) with details of the incentives to encourage sustainable travel with links to the Travel Plan. The LHA recommends a number of legal agreements to secure the overall parking strategy. • Maximum visitor ticket demand (750 per hour) is capped and controlled by planning condition or legal agreement.
National Highways (NH)	<p>An initial Holding Response was received by NH requiring further information to assess the proposal. A summary of the reasons for their Holding Response is set out below:</p> <p>Lack of information and concern pertaining to:</p> <ul style="list-style-type: none"> • public transport options, • timescales related to the future year transport interventions to realise Eden's Transport vision, details regarding commitments to upgrading the rail services in the TA, • clarification how the transport strategy will be enforced to prevent visitors from using different car park to their allocations or arriving outside set hours, the dynamic booking system, consideration in the TA regarding greater potential use of Park and Rise site and effects on Strategic Road Network (SRN), • justification for staff parking assumptions and impact parking accumulation, • clarification to understand vehicle arrival assumptions in TA, • justification for use of the gravity model method, • clarification required in relation to modal split, • explanation to be provided over the scenario testing for trip generation,

	<ul style="list-style-type: none"> • persons trip rates per hour split by car, rail, private bus/coach it be clarified, • more information confirming use of projected use of Park and Ride site, • concerns over lack of parking at peak times with car parking accumulation review is needed to understand current demand levels and occupancy levels, • concerns relating to parking requirements, strategy and management and the potential impacts on J34 Park and Ride if in future years the local authority take steps to reduce parking capacity within Morecambe coupled with a rise in visitors associated with the revival • more detailed modelling of M6 J34 to be undertaken. <p>Following the submission of Further Information, NH have removed their Holding Response. NH do not object and recommend the following conditions (in summary) and their implementation:</p> <ul style="list-style-type: none"> • Provision of a Visitor Access Strategy (VAS), which links back to the principles of the Transport Strategy proposed and set out in the application, and its implementation for the lifetime of the development. • No part of the development shall be brought into use prior to the implementation of any visitor access policies and works required arising from the VAS. • No part of the development to be brought into use prior to the implementation of the approved VAS and those parts capable of implementation after occupation shall be implemented in accordance with the approved timescales and thereafter. <p>NH are clear that any deviation from the parking strategy set out in the application would require re-consultation with NH. Furthermore, should there be any changes to the provision or operation methods of car parking dedicated to use of visitors to EPN (once a parking strategy is agreed), prior agreement would be required by the LPA in consultation with NH and the County Council. NH also wish to be consulted on the Construction Traffic Management Plan.</p>
Network Rail	<p>Initial response from Network Rail set out the following points:</p> <ul style="list-style-type: none"> • Given the emphasis on the Green Travel Plan it is likely that there will be a significant uplift in passengers using trains, particularly Lancaster. The proposal <i>should contribute to improvements to cycling and passenger waiting facilities</i> at Lancaster as well as improving Morecambe station with ticketing facilities and a canopy to reduce the concentration of passengers within the booking hall in times of inclement weather. • Any proposed service uplift needs to be evidenced with timetable modelling with confirmation from the Train Operating Company that they can run the proposed service. <p>Following the submission of Further Information, Network Rail have raised no objection and commented as follows:</p> <p><i>Network Rail are pleased to see the Eden project recognising existing constraints along the route and look forward to working with them in the future should any uplift in service provision be in the offing.</i></p>
United Utilities	<p>Following an initial holding response, UU now do not object to the proposed subject to the following conditions:</p> <ul style="list-style-type: none"> • Submission of foul and sustainable surface water drainage scheme and implementation before occupation of the development. • Management and maintenance of the drainage infrastructure.

	<p>UU recommends (through advice not planning conditions) a non-return value may be required before connection into the public sewer and recommend separate discussions with a Development Engineer for UU. UU also recommend EPN engage with their water supply team at their earliest opportunity in the event reinforcement to the water network is required to meet demands.</p>
Lead Local Flood Authority	<p>No objection subject to the following conditions:</p> <ul style="list-style-type: none"> • Development to be carried out in accordance with the Flood Risk Assessment. • Submission of Final Surface Water Drainage Scheme (based on submitted drainage strategy) to include details of the management and control of water in exceedance events, having regard to the requirement for flood gates to the development itself. • Demolition and Construction Phase Surface Water Management Plan • Operation and Maintenance and Verification Report of constructed Sustainable Drainage System. <p>Several advice notes are provided by the LLFA to help inform and address the above condition requirements.</p>
Environment Agency (EA)	<p>An initial Objection was received on the following grounds:</p> <ul style="list-style-type: none"> • Insufficient information to enable adequate assessment of the flood risks posed by the development. The FRA does not meet the requirements of the NPPF and further information is required, including: <ul style="list-style-type: none"> ○ Product 4 FRA utilising data already provided by the EA (as part of pre-application discussions). ○ Consideration of flood risk posed by the development elsewhere and consideration of climate change. ○ The effects of level changes on site and flood risk ○ Details of flood risk management at the basement level. <p>Following the submission of Further Information, the EA have withdrawn their objection. The EA do not object, provided the following conditions are imposed to ensure the development meets the NPPF requirements in relation to flood risk:</p> <ul style="list-style-type: none"> • Flood Risk Mitigation Strategy (to be based on the outcomes of an updated hydraulic model, which shall inform site specific measures identified in the proposed mitigation strategy, such as heights of flood gates). • Flood Management Plan to include: <ul style="list-style-type: none"> ➢ Location of proposed barriers ➢ Heights of proposed barriers ➢ Details of the management and maintenance (for the lifetime of the development) of the flood management measures. ➢ Flood Warning and Evacuation Plan (the EA note this is a matter for Emergency Planners opposed to the EA). <p>The EA in their initial response, raised no objection to the development in relation to site contamination and recommended a condition for a site remediation strategy.</p>
Marine Management Organisation	<p>No comments received at the time of drafting this response. Any comments submitted shall be verbally presented.</p>
Natural England	<p>No objection provided the following mitigation is secured to ensure the Project will not have adverse effect on the integrity of Morecambe Bay Special Area of Conservation (SAC), Morecambe Bay and Duddon Estuary Special Protection Area (SPA) and Morecambe Bay Ramsar site and will not damage or destroy the interest</p>

	<p>features for which Morecambe Bay Site of Special Scientific Interest (SSSI) has been notified:</p> <ul style="list-style-type: none"> • The creation of a Construction Environmental Management Plan (CEMP) including mitigation measures set out in the approved shadow Appropriate Assessment. • The outdoor arena is only used during summer months (April to September). • A dark corridor is maintained adjacent to the development site with all external illumination being directed towards and landside. • The development of the Outreach and Education Plan (OEP) prior to opening and the implementation and review of the Plan in conjunction with Natural England and the LPA.
Greater Manchester Ecology Unity (GMEU)	<p>Initial response required further information regarding mitigation to secure no likely significant effects (LSE) for the purposes of the Habitat Regulations Assessment (HRA), but concluded the impacts arising from the development on protected bat species is acceptable, subject to a condition ensuring additional bat surveys be undertaken if demolition does not occur before April 2023; that the submitted and approved landscaping scheme be secured by condition, and; that the assessment of Biodiversity Net Gain demonstrates a significant uplift above 10% and is supported. GMEU recommend a condition to manage and maintain the approved landscaping/habitat creation.</p> <p>Following the submission of Further Information GMEU raise no objection subject to the following conditions:</p> <ul style="list-style-type: none"> • CEMP with identified heads of terms linking to pollution control (air, noise and light), crane location and operation and weather stoppage protocol), • Drainage conditions (to prevent waterborne pollution entering the designated site once operational), • Protocol to define and then restriction outdoor events to 8 within the summer period only. • Lighting strategy (to maintain dark corridors along and adjacent to the designated site) • Collision Monitoring Programme <p>To mitigate against recreational disturbance, an Outreach and Education Plan shall be provided based on the details contained in the sHRA. GMEU advise this should be controlled by legal agreement opposed to condition. GMEU advise on-site recreational mitigation can be managed through a Interpretation, Marketing and Communication Strategy (by condition).</p> <p>GMEU concur with the conclusions of the updated sHRA that the development will not lead to LSE on the integrity of the designated sites provided the mitigation can be adequately delivered.</p> <p>GMEU conclude that the LPA can report its own findings of the HRA and its conclusions in the officer report and ensure NE are aware of their decision.</p>
Morecambe Bay Partnership	No comments received at the time of drafting this response. Any comments submitted shall be verbally presented.
Wildlife Trust	<p>The following comments have been received:</p> <ul style="list-style-type: none"> • Biodiversity Net Gain (BNG) Assessment – there are some inconsistencies in the % outcome of the BNG so unsure which is correct, but both are very welcomed. • A commitment for the implementation of a 30-year management and monitoring plan for BNG is welcomed.

	<ul style="list-style-type: none"> • Some concerns over mitigating against recreational disturbance given the number of potential visitors to EPN and that this should be addressed as part of EPNs Interpretation/Education plans. • Welcome the JNCC commitment to temporary stoppage of works in relation to high disturbance construction operations during prolonged freezing weather. • Welcome the opportunity for EPN to work more widely with nature recovery project in the Bay area and with key partners over consistent environmental messaging. • Recognising that a CEMP and 30-year maintenance plan are equally as important as the shadow HRA to be a successful project. • Recognises the physical footprint of the development is comparatively small, but its influence and educational opportunities is likely to be immense.
RSPB	No comments received at the time of drafting this response. Any comments submitted shall be verbally presented.
Historic England	<p>No objection Historic England conclude as follows:</p> <ul style="list-style-type: none"> • The proposal would affect the character and appearance of the conservation area, but the impacts would be limited, largely due to the sense of separation from the wider town and the history of varied uses on the proposed site. HE notes the proposal would add a new contemporary dimension to the character and appearance of the area, much like the Midland Hotel did in 1933. • The Midland was designed to be a prominent building in a prominent location and the proposal would have an impact on this characteristic by virtue of the bold design and siting, drawing attention and diluting the listed Midland Hotel. However, HE recognises the proposal brings benefits to the setting of the listed building via the proposed landscaping and public realm works. On balance, HE concludes the proposals would amount to less than substantial harm. • The wider setting of the Winter Gardens would be affected, narrowing the view from the building and its intervisibility with the promenade and the stone jetty. However, directly opposite the Winter Gardens, the proposals includes a landscapes garden and performance area which would make a positive contribution to the wider setting and help invigorate the building. On balance, HE concludes the proposals would amount to less than substantial harm
Conservation Officer	<p>No objection to the principle of the development with the following key points/comments raised:</p> <ul style="list-style-type: none"> • Recognition of the sites highly sensitive position within the Conservation Area surrounded by significant listed buildings, but also the importance of the wider townscape and the stunning views of the sea, mountains and sunsets that are part of Morecambe's enduring appeal. • The re-development of the site is, therefore, a welcome opportunity to revitalise this area and add further distinctive character to the conservation area. As a visitor attraction, the use would reinforce the historic character of the site and wider area. In visual terms, the new development would add another memorable and distinctive component to the visual character of the area. • Impact on the character of the Conservation Area would be considerable given the scale and character of the development and views along the promenade would be affected. However, the site stands apart from the continuous historic build form along the town frontage and has always been the location of large-scale leisure development. This juxtaposition of

	<p>architectural form and space is an element of the conservation area's lively and appealing visual character, and this development would re-invigorate this quality and enhance the character and appearance of the Conservation Area.</p> <ul style="list-style-type: none"> • Current prominence and visibility of the Grade II* listed Midland Hotel in particular, juxtaposed with the proposed new scheme, means there would inevitably be some degree of impact on the setting of this listed building and the wider townscape and concludes the proposal would result in moderate harm to the setting of the Midland Hotel. A slight tweaking to the position of the most easterly dome could improve the harm identified. This harm would be less than substantial. • Due to the position of the buildings and the enhanced landscaping proposals, on balance the development overall would not cause harm to the setting of the Grade II* listed Winter Gardens. • Due to the close proximity of the development to the Grade II listed War Memorial, the impact on setting would be significant. However, this impact is not considered harmful given the Memorial already sits within a busy thoroughfare overlooked by buildings and bearing in mind the poor condition of the site. • Landscaping is comprehensive and creates diverse and dynamic character to the development, disappointment over the use of buff asphalt to the southern promenade with a preference for natural stone, welcome the detailing to the promenade elevation and recommend the raised walkway be publicly accessible so glimpses into the buildings add to the positively experience of walking along the promenade. • In terms of materials and the appearance of the buildings, some concerns expressed that the use of ETFE will give a cellular character similar to the buildings at Eden Project Cornwall. The detailed design should root back to the original inspiration of the seashell and deliver a concentric pattern of shell growth rings. The asymmetric shell profiles should not be lost. Noting there is scope at the architectural design and detailing stage to strengthen this aspect of the scheme. <p>Overall, concludes that the level of harm to the Grade II* Midland Hotel is judged less than substantial and likely to be justified by other public benefits, including heritage benefits of significantly enhancing the quality of the site and the Conservation Area.</p>
Lancashire County Council (Archaeology)	<p>No objection</p> <p>Comments received confirm the site is unlikely to hold anything of archaeological significance and not further archaeological work would be required.</p>
Historic Buildings and Places (Ancient Monuments Society)	<p>Do not wish to make comment and advice we defer to the specialist conservation advice within the Authority.</p>
Lancaster Civic Society	<p>No objection and offering full support for the proposal. A summary of their comments are as follows:</p> <ul style="list-style-type: none"> • the proposed development would have a very positive impact on Morecambe and the broader area with transformational economic impacts for the Bay area. • the design to be exemplary. • that the applicant has gone to considerable lengths to demonstrate how the impact of significantly increased visitor numbers can be dealt with and hope this

	<ul style="list-style-type: none"> the City and County Councils need to play their part in facilitating much improved transport facilities (road and rail) and increasing the provision of hotel accommodation.
National Trust	No comments received at the time of drafting this response. Any comments submitted shall be verbally presented.
Winter Gardens Preservation Society	No comments received at the time of drafting this response. Any comments submitted shall be verbally presented.
Arnside & Silverdale AONB Partnership	<p>No objection. Comments received are as follows:</p> <ul style="list-style-type: none"> While the development will clearly be visible from the AONB, it is accepted that the impact on visual amenity will not be significant. External lighting to be kept to a minimal, noting paragraph 185 of the NPPF and the need to limit the impacts of light pollution from artificial lighting on local amenity, intrinsically dark landscapes and nature conservation. The applicant, City Council and County Council should consider the impacts and management of increased visitors and sustainable travel across a much wider area, recognising the highway and parking infrastructure in the AONB is constrained.
Environmental Health Service	<p>Comments received. A summary is provided below:</p> <p>For the noise and air quality assessment peak traffic flows have not be used and average flows have been used instead. However, should traffic impacts change this would not in my opinion have any significant consequence on most of the headline conclusions of no significant noise or air pollution impacts, subject to conditions:</p> <ul style="list-style-type: none"> Construction Environment Management Plan (CEMP) including (not exhaustive) details of the final piling method (and if necessary site specific assessment and mitigation) details of rolling operations (in relation to vibration), dust control to maintain acceptable air quality. Construction working hours to 08:00- 18:00, with no working at weekends or on bank holidays Delivery Hours limited 09:00 – 21:00 (application proposes 07:00 – 23:00) Outdoor Events limits to 3 annually (to be reviewed and monitored to potentially enable greater number of events) Events Noise Management Plan Noise from plant and machinery limited to BS4142 rating levels Site Contamination Remediation Strategy
Lancashire Constabulary (Counter Terrorism)	<p>No objections and welcome the opportunity to be given the opportunity to comment on the planning application. Comments as follows:</p> <ul style="list-style-type: none"> Eden Project North seeks to create a new Publicly Accessible Locations (PALs) within the town. With the creation of any new crowded space comes an increased risk from various threat groups and methodologies. Whilst there is no intelligence to suggest an increased threat in this location, the risk should be taken into consideration and mitigated against, overall and on every part of the development. This also applies to the construction phases. It is encouraging to see that vehicle restriction is being planned, and I would strongly advise that it is considered at this time how this will be physically enforced and designed into the plans. The CTSA Team would welcome the opportunity to work with the applicants at the earliest opportunity in order for us to provide a confidential report around risk and threat, and offer our advice and support throughout this process.

Waste and Recycling Team	No objection and offer opportunities to discuss arrangements for Trade Waste and other waste streams with the City Council.
CSTEP	Proposal will provide much local activity from an employment and skills perspective. The application meets the threshold for an Employment and Skills Plan.
Planning Policy	<p>No objection in principle but the following concerns have been raised:</p> <ul style="list-style-type: none"> • Reliance on intended actions rather than tangible and robust actions to tackle climate change. • Interim Travel Plan does not accord with climate change mitigation aims of the emerging CELPR. • Current Parking Strategy is incompatible with the aims of the CELPR and DM63. The current strategy would generate increase traffic, greater emissions, poorer air quality, potential road safety concerns, health and life impacts and could impact local residents using car parks to access local services. • The City Centre Movement Strategy could increase demand at the P&R resulting in conflicting needs for the spaces/capacity issues. • Travel Plan is unclear in how they will achieve targets from worst-case scenario to best case scenario over time. • Inadequate cycle provision and unclear proposals for staff parking (based on policy and guidance there should be 330 cycle spaces – only 152 are provided). • Concerns the development will but excess strain on existing facilities. • Insufficient details to address the loss of disabled parking. • Signposting is supporting but should include details to encourage active/low carbon travel too. • Further consideration be given to cycle connectivity and crossing facilities over Marine Road Central to link the promenade to the Greenway. Recommends engagement with Sustains. • Recognises significant economic and regenerative benefits which must be weighed against impacts on local environment and in particularly highway network. <p>Following submission of a Clarification Note regarding climate change measures, the planning policy team are satisfied with the proposed measures and the strengthening of language particularly around their heating strategy and recommend BREEAM excellent standards are conditioned. They maintain concerned over amount of cycle provision proposed.</p>
Public Realm Lancaster City Council	No objection noting the project aligns with the policy requirements of the Morecambe Area Action Plan (MAAP) and will improve the space and standards within the public realm. However, consideration needs to be given to the impacts on the wider amenity within the town, in particular connections from Marine Road Central to the town centre.
Lancashire County Council Health, Safety & Resilience Service	No objection to the proposals commenting that in the absence of objections from the relevant agencies (EDF, County Council Planning, City Council Emergency Planning, Fire and Rescue service, Lancashire Constabulary and NW Ambulance Service), the proposals can be accommodated within the Heysham Power Station Off-site Emergency Plan.
Office of Nuclear Regulation (ONR)	No objection – The ONR does not advise against this development and comment that the development does not present a significant external hazard to the safety of the nuclear site.
Cadent Gas	No objection and recommends an advice note informing the applicant of Cadent Gas infrastructure within the area of the development.

Lancashire Fire and Rescue	Recommends the application be aware of the requirements of Document B (Part B5) of Building Regulations relating to fire safety and access for fire appliances.
Lancashire County Council (Strategic Planning)	No comments received at the time of drafting this response. Any comments submitted shall be verbally presented.
Lancaster & District Chamber of Commerce	No objection with full support offered to the proposals. Comments as follows: <ul style="list-style-type: none"> • create short and long term opportunities for our members in the supply chain but provide a welcome boost in visitor numbers and attached inward investment into the region • the development will provide commercial investment and local jobs.
Morecambe Town Council	No comments received at the time of drafting this response. Any comments submitted shall be verbally presented.
Morecambe BID	Support in principle , with the following concerns: <ul style="list-style-type: none"> • Very concerned regarding traffic impact and parking • Lack of visitor incentive to remain in Morecambe prior to visiting EPN • Lack of train services to Morecambe • An alternative Park and Ride site (closer to Heysham near the rail terminus), nearer to the centre of Morecambe is required to mitigate traffic into Morecambe. • Noise pollution from live events affecting the quality of life for residents living along the promenade. Suggests 5 times per year and capacity limited to 4-5k.
Lancaster BID	No objection with full support offered to the proposals. A summary of the comments received are as follows: <ul style="list-style-type: none"> • has the potential to provide a major attraction and be an asset to the local economy. • create local employment opportunities and attract high numbers of extra visitors to the district and provide a significant economic boost to local businesses, in particular in the tourism and hospitality sectors. • To ensure the economic benefits are felt across the whole Lancaster district, it is vital that essential that the transport infrastructure is suitable developed alongside construction of the Eden Project site itself. • transport links between Lancaster and Morecambe to be considered and to ensure network can cope with additional traffic flows.
Ramblers Association	The Ramblers are content that the promenade will not be affected and there are other through routes.
Sustrans	No objection. Following comments provided: <ul style="list-style-type: none"> • Sustrans are pleased that there will be improved wayfinding as a result of the development to reflect the realignment of Route 700 to the north of the promenade, and for Route 69 to start/finish south of The Midland hotel. • Sustrans would like to echo the consultation response of 15th October which states that: <i>The existing Lancaster/ Morecambe Greenway (Way of the Roses) is recognised within the TP as an important link between the site and Lancaster. It should be noted that the connection between the Promenade and the Lancaster Greenway is on-road and is via two roundabouts, one on Marine Road and the other on Central Drive. It is currently a confusing and unattractive route and requires upgrading. The Morecambe Area Action Plan and the emerging LCWIP identify this as an issue. The City and County Councils (and Sustrans) are seeking improvements to the network in this area.</i> <i>In order to maximise opportunities for active travel the applicant should give consideration to how this can be improved, both in order to meet its own</i>

	<p><i>targets for employees arriving by sustainable modes and to encourage visitors arriving from Lancaster.</i></p> <ul style="list-style-type: none"> Sustrans would welcome the opportunity to improve this section of Route 69 as the final 550m from the end of the greenway route to the Eden Project boundary will be critical in further increasing active travel levels to the site.
Dynamo	No comments received at the time of drafting this response. Any comments submitted shall be verbally presented.
Carnforth Town Council	<p>No objection offering support for the proposal. A summary of the comments include:</p> <ul style="list-style-type: none"> Design and layout imaginative and innovative providing a focal point to the seafront. Transport infrastructure will be the key to the project's success. Recognises Carnforth could provide a northern transport hub and fast rail shuttle between Carnforth and Morecambe, in addition to or utilising the Park and Ride Shuttle Bus. Opportunities for a potential rail link between the two towns, which could form part of the visitor experience. Opportunities to provide better cycling routes between the two towns, noting a number of visitors may stay in the many holiday campsites surrounding Carnforth. EPN will fit in well with other environmental attractions around the Bay (such as Leighton Moss and the Arnsdale and Silverdale AONB) and will enhance the visitor attraction package to the area. EPN will stimulate local employment, business opportunities and provide economic benefits to the wider community.
Barrow Borough Council (BBC)	<p>No objection. BBC offer full support to the project noting the project will enhance the sub-region as a high-quality sustainable tourism destination, showcasing the exceptional environment of Morecambe Bay, promoting economic development and social wellbeing and acting as a catalyst for further economic opportunities in Barrow. The project will support the Barrow Council Plan Vision and the Council Plan priorities. BBC also recognise that links can be established between EPN and the Earne Bay Outdoor Activity Centre which forms part of our Brilliant Barrow Town Deal to provide outdoor activities and education in the Bay.</p>
Fylde Borough Council	Despite the scale of the proposal it is well separated from Fylde Borough and so the Council does not wish to make any observations on the application.
Wyre Borough Council	No comments received at the time of drafting this response. Any comments submitted shall be verbally presented.
South Lakeland District Council	No comments received at the time of drafting this response. Any comments submitted shall be verbally presented.

4.2 The following responses have been received from members of the public:

2 representations **opposing** the proposal. A summary of the main reasons for opposition are as follows:

- The building is too large for the site, creating a dominant feature that is oversized in the current townscape. This is a concern given the importance of surrounding features and buildings (Stone Jetty, RNLI, Winter Gardens, Midland Hotel).
- The shell buildings are overly tall with little functional space in their upper roof space rendering their height necessary
- Concerns over the appearance of the non-translucent elements of the building.
- Comments received in relation to the dunescape roofs, welcoming a similar feature to the Rhythm Machine Roof with additional suggestions for viewing platforms at a higher elevation.
- The buildings will cast shadow and reduce sunlight in the winter months to North Beach and the corresponding promenade.

- The building turns its back on the town (save for the entrance) - more glazing suggested to the northwest and northern elevations.
- Concerned that the building scale is designed to cater for a larger footfall to justify the government funding required to build the project.
- Loss of the Promenade Gardens and existing trees.
- Former Frontierland site offers a more suitable location for the development.

15 representations in **support**. A summary of the main reasons for support and commentary are set out below:

- Much needed attraction with regeneration benefits to the town, the wider Morecambe area and the wider community.
- It will revive Morecambe as a tourist destination having suffered decades of decline.
- It will provide educational opportunities.
- It will offer significant local employment opportunities and provide a catalyst for future investment.
- Recognising Morecambe as one of the most deprived areas in the UK, the Eden North Project promises to reverse decline and provide significant social and economic benefits. The elimination of poverty should be a priority.
- The council should not only approve the planning application but work with Eden to exert pressure on government for funding.
- The council should take advantage of the project and deliver a renewed Masterplan for the West End and its integration with the Eden Project.
- Lancaster and Morecambe must be central to the scheme – the whole town not just the Promenade.
- Access to be provided but without impact on the awful traffic situation in Lancaster.
- Logistical negatives against the scheme would be outnumbered by numerous advantages for the local community.
- There should be reduced cost entry for locals

1 letter of support but raising the following concerns/comments:

- Concerned that there is not sufficient parking in Morecambe for the development as well as local traffic/parking needs for other visitors to Morecambe not visiting the attraction.
- Queries when the parking surveys took place.

2 representations received neither objecting or supporting. A summary of the comments are as follows:

- How does this impact Morecambe Festival Market, which provides an income for many families?
- Recognition that the project would be a great asset to the area but concerns over how it fits with the wider public realm, how it integrates with Morecambe and its heritage, the implications arising from additional traffic and the lack of a comprehensive masterplan for the town.

Representations have been received from the director of the Best Western Lothersdale Hotel offering full support of the project, noting significant benefits to local employment, the local hospitality economy and the evening economy and further recognition that the proposal presents a very rare opportunity to delivery such positive economic benefits to the community and wider district.

Representations have been received from Lancaster and Morecambe College (LMC) in favour of the proposal. LMC highlight the fact they have been collaborating with EPIL since November 2018, based on workforce development. In partnership, LMC, EPIL and a multitude of other partners have now developed the Morecambe Bay Curriculum which showcases outstanding collaboration. LMC state that as the districts technical educational college, they have a key role to play in ensuring the community benefit from potential employment opportunities. Working with EPIL, they are working to prepare a local workforce for eco-education tourism, including the Eden Study Programme and the Eden Traineeship scheme. They now have created an EPN Learning Hub on campus (2019). LMC share many of the same values as EPIL, particularly in relation to social mobility and social justice. LMC state that they will strive to provide opportunities to all members of the community to upskill and gain sustainable employment as the local economy is revitalised by the prospects of

EPN. LMC hope that apprenticeships and work placements will be embraced not only by EPN but the supply chain too, especially during construction.

David Morris MP for Morecambe and Lunesdale has made representations to the planning application offering full support for the project. The reasons for support are as follows:

- It is a lifetime opportunity for our town and has the capability to be a game-changer not just for the economic fortunes of Morecambe but the whole of the North West.
- The project has overwhelming community support which is a testament to EPIL approach to community engagement and partnership working (noting the Eden curriculum being taught at schools/colleges across the area as well as investment made by Eden's partners to kick start early feasibility).
- The investment needed to build the project will be far outweighed by the economic benefits the project will bring to the community (noting the success of Eden Project Cornwall which cost an acclaimed £105 million to build but so far as contribution £2.2 billion to the regional economy).
- Every confidence in EPIL's business model and ability to operate a world class tourist facility.
- Recognises that the 1 million visitors a year EPN will bring this will inject around £200 million a year into the north-west regional economy, supporting 1,500 quality green-collar jobs across the supply chain.
- Such jobs are crucial, and the education programmes that provide training for them will be vital for both the Government to realise their zero-carbon ambitions, and will make the north-west a leading green hub.
- EPN will create obvious employment benefits and knock-on effects to the region's visitor economy and supply chains and will be a catalytic investment which will deliver an example of levelling up of the north-south economic performance.
- EPN will offer significant educational benefits to 427 schools in its catchment.
- EPN will provide a beacon for green initiatives and growth, collaborative and sustainable regeneration.

5.0 Analysis

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

- Principle of development
- Traffic, Transport, Parking and Accessibility
- Townscape effects and Open Space
- Cultural Heritage
- Natural Environment
- Flood Risk and Drainage
- Amenity and Pollution
- Climate Change
- Socio-economic and Health

5.2 **Consideration 1 - Principle of Development** (NPPF Section 2: Achieving sustainable development and Section 6: Building a strong, competitive economy; Policy SP2: Lancaster District Settlement Hierarchy, Policy SP3: Development Strategy for Lancaster District, Policy EC5 Regeneration Priority Area of the SPLA DPD; Policy DM22: Leisure Facilities and Attractions of the DM DPD and Policy SP3: Morecambe Seafront and Promenade and DO2: Strategic Leisure – Seafront Headland and Central Promenade of the Morecambe Area Action Plan (MAAP)).

5.2.1 The principal planning documents making up part of the Development Plan relevant to the Eden Project comprise the following:

- Lancaster Local Plan Part One – Strategic Policies and Land Allocations (SPLA) DPD (2020)
- Lancaster Local Plan Part Two – Development Management Policies (DM) DPD (2020)
- Morecambe Area Action Plan (MAAP) (2014).
- The emerging Climate Emergency Local Plan Review (2022) (This document is at the time of writing at the pre-publication stage and is not adopted, and so it currently has limited weight).

5.2.2 The SPLA DPD sets out a spatial vision and strategic objectives for Lancaster District in order to plan and identify land to meet future development needs and to identify land that should be protected for its environmental, social and economic importance. The Plan seeks to protect our unique landscapes and the natural environment, drive positive economic potential, deliver strong and diverse communities and to protect our built heritage. Within the SPLA DPD, the vision for Morecambe is to create a *'confident community with a regenerated living, working and leisure environment. The town will be a focal point on Morecambe Bay, where enjoyment of, and the opportunities to interact with, the wider natural environment are safely, responsibly and positively interpreted and supported'*. Securing sustainable development opportunities in Morecambe has a significant role to play in delivering the districts spatial vision. Morecambe is also identified as a Key Service Centre in the district's settlement hierarchy (Policy SP2) and as such, can accommodate significant forms of development to support and enhance the role of the districts regional centre (Lancaster City) and support economic development to serve more localised catchments. Development within the urban area of Morecambe equally aligns with the urban-focused development strategy for the district identified under policy SP3 of the SPLA DPD. The SPLA also identifies with site within a Regeneration Priority Area (RePA), which seeks to provide context and a framework to guide future development to make Morecambe a vibrant and successful town for the 21st century. Central Morecambe is identified as a RePA under policy EC5.1, recognised for its sub-regional importance and scope for tourism and heritage-led regeneration to re-invent the town as a visitor destination. This framework policy equally recognises the value and importance of the natural environment around the site and how this can complement future regeneration.

5.2.3 Policy DM22 of the DM DPD relates to major new leisure development. This states that such development should be located within the town centre boundaries of Lancaster and Morecambe, preferably in a brownfield land in Morecambe in accordance with policy EC5 (SPLA DPD); or where it is supported by a site-specific allocation or part of a direction of mixed-use growth set out elsewhere within the development plan. This policy aims to direct development to the most sustainable of locations. The site lies adjacent to Morecambe Town Centre and given the anticipated visitor numbers and the applicant's global reputation, will provide a catalyst for regeneration locally and regionally. Notwithstanding this, the site is allocated for site-specific uses in the MAAP.

5.2.4 The strategic objectives of the Development Plan relevant to Central Morecambe are to be delivered in line with the spatial plan set out in the MAAP. The focus of the MAAP is regeneration and maximising on the area's unique and beautiful marine setting, whilst protecting the natural environment. The proposed site is located within Development Opportunity Site DO2. This provides support for proposals incorporating leisure uses, a visitor/education centre, visitor accommodation or other holiday accommodation.

5.2.4 EPN will provide a regionally, if not nationally important, tourist attraction that shall comprise predominately leisure and education/exhibition-based uses, utilising previously developed land. The proposal represents a comprehensive redevelopment of the whole of the allocated site (DO2) and will deliver significant regeneration benefits for the town itself. The development equally seeks to protect and retain all the surrounding promenade. Consequently, the proposal is considered entirely consistent with the land use policy requirements set out in policy DO2 and SP3 of the MAAP, DM22 of the DM DPD and the wider strategic policies set out in the SPLA DPD.

5.2.5 The project is unique and truly exciting and provides a once in a generation opportunity to revive Morecambe as a seaside resort for the benefit of its local community, the wider district, the Bay area and the North-West region. EPN seeks to be an innovative and exemplar form of sustainable development that showcases and educates the importance of climate change, regenerative sustainability, and our integration with (and protection of) the natural environment. Whilst the principle of the development is supported in land-use terms, there are a number of key material considerations that need to be considered to ensure the development constitutes a sustainable form of development.

5.3 **Key Planning Material Considerations**

During pre-applications discussions and as part of the EIA scoping exercise, the local planning authority identified several key issues that would need to be satisfactorily assessed. This work focused on three key topic areas; (i) transport and access strategy; (ii) the effects of the development on nature conservation; and (iii) the impact on the built heritage of the site. These are addressed below, followed by consideration and assessment of the other considerations set out in paragraph 5.1.

5.3.1 **Consideration 2 - Traffic, Transport, Parking and Accessibility** (NPPF: Chapter 9 paragraphs 104,105,107, 108, 110-113:Promoting Sustainable Transport and Chapter 12 paragraph 130 Achieving well-design places; Strategic Policies and Land Allocations (SPLA) DPD policies SP10: Improving Transport Connectivity, T1 : Lancaster Park and Ride, T2: Cycling and Walking Network and T4: Public Transport Corridors; Development Management (DM) DPD policies DM29: Key Design Principles, DM60: Enhancing Accessibility and Transport Linkages, DM61: Walking and Cycling, DM62: Vehicle Parking Provision, DM63: Transport Efficiency and Travel Plans; DM64: Lancaster District Highways and Transport Masterplan and Morecambe Area Action Plan Policies SP1: Key Pedestrian Routes and Spaces, SP3: Morecambe Main Seafront and Promenade and DO2: Strategic Leisure – Seafront Headland and Central Promenade.

Planning policy and decision making should strive to deliver sustainable development. The above policies seek to ensure major development is located in sustainable locations in the first instance. Policy then expects priority to be given to sustainable transport modes with the protection and enhancement of pedestrian and cycle infrastructure. Development must be accessible to all modes in a safe and confident way with any residual traffic impact capable of being accommodate without severe impacts on the safe and efficient operation of the highway network. In relation to the MAAP, it seeks to ensure key pedestrian routes around the site are protected and the public realm enhanced, with improved connections across Marine Road Central towards the landward side of the town. EPN aims to ensure these policies are met in full.

5.3.2 The site lies within one of the districts main urban areas. Consequently, access to and from the site can be provided by public transport with both the bus network and the railway station within a short and easy walking distance from the site. It is equally well-connected for pedestrians and cyclists via the promenade, which forms part of the Lancashire Coastal Way. The Bay Gateway now provides a more direct route to the town from the Strategic Road Network (SRN) for those travelling by car. Consequently, the site is considered an accessible and sustainable location to support major development as it provides opportunity to encourage more sustainable modes of travel. The location of the site conforms with the strategic transport policies in the development plan in terms of locational sustainability.

5.3.3 **Active Travel and Sustainable Transport**

Given the sites' central location, it is anticipated that local visitors to the attraction will use sustainable modes of transport to access the development and will be incentivised through the ticketing to do so. Frequent bus services already operate along Marine Road Central and Central Drive. There is no requirement of the development to contribute to additional services. Whilst the site is served by the promenade offering a safe and attractive route to the development for pedestrians, many visitors will be arriving in the town centre and will need to cross Marine Road Central. Currently this is a barrier and as such highway improvements are proposed to enhance crossing facilities and create a safer and more legible pedestrian environment. An indicative highway improvement scheme has evolved during the determination of this application which now satisfactorily addresses policy requirements to enhance pedestrian environment and in particular links across to the town centre. This indicative proposal shall form the basis for an off-site highway scheme to be delivered and implemented before the development is operational. This will be a requirement of a planning condition and is supported by the local highway authority. As well as delivering improved crossing facilities, this scheme proposes changes to the roundabout junction at Central Drive and Northumberland Street and changes to Marine Road Central, providing dedicated drop-off and pick-up areas and servicing laybys, and effectively removing the unrestricted on-street parking that currently exists outside the site frontage.

5.3.4 In terms of cycle provision and the promotion of cycling, the site is situated between two recognised cycle routes which shall be protected and retained as part of the development. EPIL have and shall continue to engage with Sustrans, who have indicated they would like to introduce changes to both routes passing through the site to avoid duplication and confusion for cyclists. This would be delivered outside the scope of the application; however, EPN will deliver improve wayfinding and signage focusing on the promotion of sustainable modes of travel, which is welcomed by Sustrans. In terms of direct improvements to the cycle network, it is accepted that the section of Route 69 between the promenade and Greenway is poor. It is anticipated that the off-site highway works condition will ensure improvements are provided to enhance part of this section of the route within the scope of their Marine Road Central proposals. The applicant intends to deliver 152 cycle spaces. While this falls short of the requirements set out in policy DM62, it is accepted that EPIL have considered the requirement based on the visitor/staff profile and modal split and consider this to be a reasonable starting point for the year

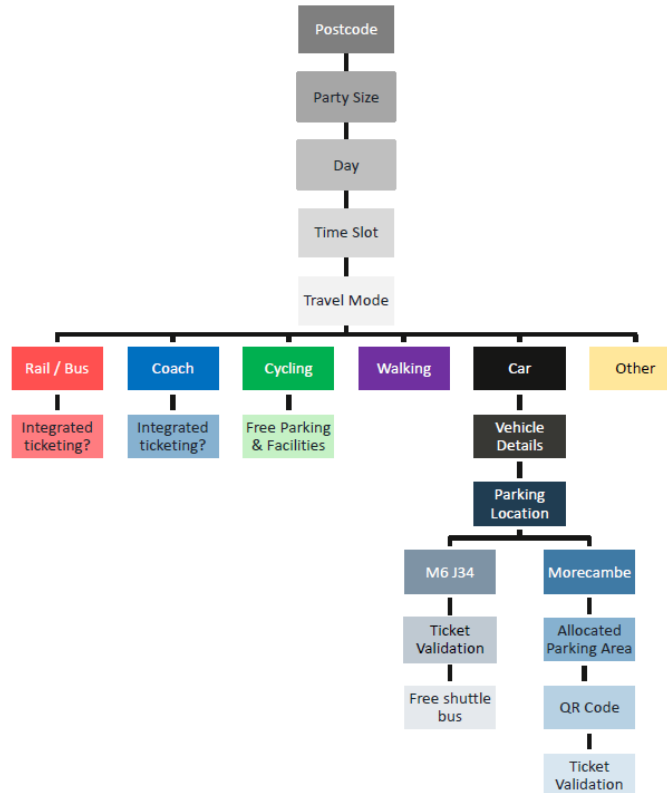
1 opening scenario. The cycle storage will be provided within the landscape areas, mainly the Energy Field. Precise details of the cycle parking can be controlled by condition. The Travel Plan shall provide targets to increase cycle use and therefore provide increased parking facilities as and when demand requires this. EPN also have an Active Travel Strategy to support and encourage walking and cycling which includes additional facilities on site such as changing rooms, drying facilities, locker facilities and free e-bike battery charging.

5.3.5 Recognising the benefits of the site's location, EPN developed an early Transport Vision (before the application was submitted) which is an ambitious long-term plan. The objectives within the Transport Vision align with the ethos and sustainability aspirations of the project and EPIL themselves. However, acknowledging a range of interventions are anticipated to be brought forward by external parties (such as the rail industry), a realistic Transport Strategy has been developed for the opening year scenario which supports this planning application and Environmental Statement. EPIL have stated in this submission, that they will continue to collaborate and work closely with their partners and sustainable transport providers to help meet the future ambitions of Eden's Transport Vision.

5.3.6 EPIL have developed a multi-modal Transport Strategy developed in consultation and collaboration with statutory consultees and non-statutory stakeholders. The key principle of the Eden Transport Strategy is to encourage people to arrive by non-car modes, particular for the last mile of the journey. Key aspects of the Transport Strategy include the utilisation of existing infrastructure to serve the needs of the development (this largely relates to parking), together with a time-controlled and advanced dynamic booking system. The Outline Business Case (OBC) submitted to HM Government demonstrated that the use of existing assets means that the proposed development can be developed without extensive transport infrastructure or operation costs and better aligns with EPIL sustainability ethos. The booking system will allocate visitors a specific time slot to arrive and enter the site. This provides operational benefits for EPIL, it should also enhance the visitor experience, as well as controlling the number of generated trips and subsequent parking to the site/area. EPIL developed a time controlled and advanced booking system for the Cornwall site in 2019, which at the time was not commonly used amongst major leisure attractions. However, the COVID pandemic has led to a substantial increase in the use of such systems. The proposed booking system is not simply a matter of booking a timed slot to visit the attraction. It will require visitors to select where they are travelling from (to identify travel options and routes) with ticketing incentivised to encourage active travel and sustainable travel options (such as integrated ticketing including rail/bus fares). The booking system will have options for day visitors or overnight visitors. The booking system will also be able to direct visitors to the most suitable car parks depending on their departure destination. It is proposed that each method of travel tickets will be accompanied by a sustainability accreditation, showcasing the environmental impact generation by the purchased method of travel. The purpose of this is to align with EPIL sustainability ethos and continue to raise awareness and encourage more sustainable options. The booking system would be controlled by EPIL.

5.3.7 The submitted Transport Assessment includes a Booking System flowchart which helps explain how the system would operate by asking a series of initial generic questions. This is provided below:

Figure 5-3 - Booking System Flowchart



The successful implementation of the booking system is integral to the delivery of the Transport Strategy and the impacts on the local highway network and parking requirements.

5.3.8 **Traffic Impacts - Trip Generation and Distribution.**

The application has been supported by a Transport Assessment (TA), Travel Plan and a TA Addendum that form appendices to the main Environmental Statement. The anticipated trip generation arising from the development is broken down into staff and visitor trips and for visitors this is broken down into peak, inter peak and off-peak periods over the year. The maximum number of daily visitors in the peak period is 3,750 with an absolute maximum of 750 visitors per hour. The peak period equates to 100 days in the year occurring in the summer holidays, school holidays, bank holidays and weekends occurring in these holiday periods. For the remaining part of the year between 1,250 to 2,500 visitors per day are anticipated to visit EPN. For the purposes of the TA, the maximum 750 visitors per hour per day is a known assumption for the purposes of calculating trip generation.

5.3.9 A visitor arrival and departure profile has been submitted based on the maximum 750 visitors per hour per day (worst case scenario). Detailed analysis and review of the trip distribution, modal split and car occupancy rate (a summary of the main assumptions are set out below) has provided the basis for calculating trip generation.

Key assumptions/facts

- circa 76% of the visitors to the attraction will be day visitors and the remaining 24% overnight visitors.
- Circa 60% of visitors will travel from the south, 14% from the east and 26% from the north within a 120+ minute catchment areas (Glasgow/Edinburgh in the north to Birmingham to the south).
- Modal share presented for day visitors in 3 scenarios 68%, 73% and 78%
- 90% of domestic overnight visitors will travel by car, 7% by rail and 3% by bus/coach.
- 16.7% of international overnight visitors will travel by car, 58.3% by rail and 25% by bus/coach.
- Car occupancy rate of 3 occupants per vehicle (consistent with occupancy rates for similar attractions).

From extrapolating the data from the TA, a summary of trip generation is provided in the tables below based on worst case scenario assumptions (these are labelled 4-6 as the initial assessment considered 6 scenarios in total – the first 3 were scoped out).

Visitor Trip Generation (at peak hour arrivals only – 11:00 during the peak period)			
	Scenario 4 (68% by car)	Scenario 5 (73% by car)	Scenario 6 (78% by car)
Visitors (based on occupancy level of 3)	456	483	513
Vehicles	152	161	171
Rail	225	195	167
Bus/Coach	70	70	70

Trip Generation (two-way movements at peak time 2pm during the peak period)			
	Scenario 4 (68% by car)	Scenario 5 (73% by car)	Scenario 6 (78% by car)
Visitors (based on occupancy level of 3)	552	588	624
Vehicles	184	196	208
Rail	273	237	202
Bus/Coach	84	84	84

Following the submission of further information and clarification, both the local highway authority and National Highways are satisfied with the visitor trip generation assumptions.

5.3.10 EPN anticipates 417 jobs annually created by the development. Of these 28 are expected to be working remotely in Cornwall. Therefore, a maximum of 389 employees are expected to be based in Morecambe. The type of employment has been broken down into 2 groups relating to the venue operation/facilities/services and opening hours. This assumes one group (G1) will work between 08:00–13:00 and will end between 17:00 and 22:00, and another group (G2) will work a standard working day from 08:00–17:00. The proportion of staff to each group is split as 68% (G1) and 32% (G2). The evidence presented in the submission indicates that the vast majority of employees will live in the local urban area and therefore can travel by sustainable modes of transport. That said, based on work census data it can be seen that the working populations with residence in the region usually commute to Morecambe by car (64%), 21% on foot, 9% by public transport, 4% by cycling and 1% by rail. Given regenerative sustainability is at the heart of the project, the applicant assumes most employees will travel by sustainable modes and will be incentivised to do so through the Travel Plan. It assumes a maximum of 278 employees expected to be on site at any given time of which 251 employees are expected to commute by active travel or sustainable transport and 28 by car. This is considered a very ambitious target which is to be expected given the project's environmental objectives. However, the local highway authority considers this to be unlikely to be achievable irrespective of the travel concessions offered by EPN. A comparison is drawn utilising journey to work data as presenting in the TA whereby demand to travel by private car is 57%, which equates to considerably more vehicles (159) and 72 during the morning peak. The LHA do not raise an objection on this matter and assume that any additional staff trips above that assumed by the applicant are likely to utilise on-street parking around the town. To overcome the uncertainty, the LHA recommend that travel to work patterns/modal split are accurately monitored to inform and deliver the Travel Plan targets (s well as ensuring through the parking strategy sufficient parking is available). Furthermore, it is recommended that on-street parking surveys are undertaken prior to opening and repeat surveys undertaken to determine any consequences of the development. The results of which shall be fed into the Travel Plan. These measures are capable of being controlled through a Travel Plan condition.

5.3.11 Parking Considerations

The above trip generation assumptions are necessary to feed into the Parking Strategy, active travel and sustainable transport proposals. In terms of the Parking Strategy, the application (as set out in the OBC) relies on existing infrastructure outside the red edge boundary of the site to meets its parking demand. EPN propose to utilise parking at the junction 34 Park and Ride (P&R) site off the M6 as well as town centre parking in Morecambe. This strategy has been the subject of extensive pre-application discussion with the City Council and County Council (acting in their respective landowner capacities) as well as the LPA. The P&R site has a capacity for 650 vehicles. EPN intends to utilise a maximum of 389 spaces at this site at peak times. This will intercept a significant number of vehicles off the Strategic Road Network (SRN). The amount of available parking at the P&R and the capacity to accommodate the demand from this development has been sufficiently demonstrated to the satisfaction of the County Council and National Highways. Within Morecambe there are approximately 2000 surface parking

spaces distributed across council owned and private car parks. The TA indicates an average parking utilisation of 39% across the town (of peak), with the peak in the region of 70-80%. This evidence has been provided by the City Council at the pre-application stage. The surplus at peak times represents 450 parking spaces of the 1,800 parking spaces in the control of the City Council. As such, EPN intend to absorb this spare capacity to meet their parking demands. This is not necessarily disputed, although the capacity of some of the car parks may vary from the assumptions set out in the TA. The deviation from assumed spaces and spaces actually available will be relatively minor and any residual capable of being absorbed elsewhere within the town. At peak times this may be at the cost of reducing parking available to non-Eden visitors.

- 5.3.12 Parking demand is based on a vehicle requiring a parking space for the full day (in order to maximise dwell time in the town to achieve wider benefits) and does not assume any parking rotation. The assumed parking demands is set out below (taken from the TA):

Table 8-3 - Parking Demand

Period	Days / Year	Visitors / Day	Parking Demand
Peak	100	3,750	759 – 854
Inter Peak	200	2,500	506
Off Peak	60	1,250	253

The parking demand is expected to be split 50:50 between the P&R site and town and edge of centre car parks. Whilst Lancashire County Council has offered EPIL the use of the northern section of the P&R site (389 parking spaces), the remaining parking demand shall be met in Morecambe utilising existing car parks relatively close to the site, including the Telephone Exchange, Goods Yard, Central Drive, Billy Hill and the Town Hall car park (approximately 433 spaces). The total spaces available falls between the maximum parking demand identified. The City Council are in separate discussions with EPIL regarding the precise arrangements for securing parking spaces across the Council's portfolio of sites. The LPA have reassurance that such agreements are capable of being met. The LPA have similar reassurances that P&R parking spaces will be secured from the County Council. There is confidence therefore that the parking demand can be adequately met off-site. The applicant claims the maximum demand is likely to fall below the stated demand due to the worst-case scenario assumptions applied to the assessment. The local highway authority does not necessarily agree with the parking demand assumptions, but having tested them against their own assumptions, the net impact of the difference is likely to result in no/limited change to visitor demand, and as such would not lead to any significant harm to substantiate an objection on this basis. Whilst worst-case scenario testing has been considered and the likely impacts should be less, in terms of traffic and parking demands, it is clear that the project relies heavily on the implementation of their Transport Strategy and specifically their advanced booking ticketing system. The failure to secure this, together with the use of existing parking sites at both the P&R and the town (to meet the maximum demand parking spaces identified), would result in significant adverse highway impacts and would certainly diminish some of the wider benefits to the town (because of parking being unavailable to the local community and non-Eden visitors).

- 5.3.13 In terms of the operation of the proposed shuttle bus, this will operate daily but potentially not at all during off-peak periods. During off-peak period parking, it is expected that ticketing will direct visitors to park in the identified car parks in Morecambe Town Centre. The shuttle bus will route along the Bay Gateway, down towards Broadway and along the seafront, operating a 10-20 min frequency service (a single deck bus with approx. 40 passenger capacity). It is anticipated 4 shuttle buses will be required for all inter peak and peak days with a potential fifth service during some evening hours of peak days. Given the links to the dynamic ticketing system, a private bus service will be provided to better understand and operate the services to meet real-time demands.
- 5.3.14 To remove uncertainty and to ensure the development meets its parking demands off site in accordance with the submitted Transport Strategy, it is recommended that a Visitor Access and Parking Strategy (VAPS) be secured by legal agreement. This must demonstrate legal agreements are in place with the respective landowners to use their car parks, as well as full details of the dynamic booking system, pricing for incentivising sustainable travel modes, details of the shuttle bus services, management and enforcement regimes, necessary infrastructure and ticketing, details of accessible parking provision and the provision of EV charging points. Such must be agreed in full before the development can open and operate and it shall be implemented for the lifetime of the development. There will be review

mechanisms in place within the VAPS, as circumstances may change (for example if the Council's future town regeneration proposals impact upon the location of existing car parking) and in future years when potentially the wider ambitions of Eden's Transport Vision may be realised with an increased uptake in sustainable travel (for example improved rail services). Both the local highway authority and National Highways support the requirement for a VAPS and they would be proactively involved post-decision (should permission be granted). EPN have also agreed to this requirement.

5.3.15 Given the high-profile nature of the attraction, it will also attract a number of coach trips, such as school visits. Within a 25 miles of the proposed development there are 427 education institutions. EPN expects to attract over 70,000 students visiting the attraction annually. These visits will be catered for most likely in the inter-peak periods and would equate to on average around 10 coaches / private buses per day. Organised tours may be less frequent but will mainly travel by coach. EPN propose a Coach Group Strategy which will include routing, coach drop of and pick up points, and timings for arrivals and departures to stagger the number of coaches at any one time. The visitor centre will also have real-time information transport screens available to inform visitors of next rail, bus and shuttle bus departures. This may include private coach information too. As part of the proposed off-site highway works along the site frontage, Traffic Regulation Orders will be required to limit waiting for pick up and drop off only. Coaches will be provided with information on where to layover during their passengers visit to the development. The TA identifies 21 coach parking spaces within the local area of Heysham, Morecambe and Lancaster with an additional 250 spaces available at Truckhaven in Carnforth. Provided EPN manage private coach visits appropriately and implement a Coach Group Strategy (to form part of the wider Parking Strategy controlled by legal agreement), there is sufficient confidence the effects of coach visits would not impact the operation of the local highway.

5.3.16 Highway Capacity

Following concerns raised by National Highways and the local Highway Authority in relation to their initial highway capacity assessment, some highway/junction modelling was required to assess the impact of the scheme on the Strategic Road Network (SRN) and the local network. Utilising the original model prepared as part of the adopted Local Plan, the applicant has adjusted the model to assess the project impacts based on worst-case scenario assumptions. The Local Plan and its land allocations have been assumed as committed developments. It is important to note and critical to the assessment of highway capacity, that the EPN peak day and peak hours fall outside the highway network's peak day and peak hours (11:00 to 16:00 v typical morning peak of 8:00 and 17.00-18.00). The model demonstrates that the AM peak is not affected by the development with the DS (Do Something – Lancaster Local Plan Flows with forecasted growth) and the DS plus Eden flows remain the same. For the PM peak, the model has demonstrated that the M6 southbound off slip road is not affected by EPN traffic with the DS and DS plus Eden flows the same and within its degree of saturation and during remaining unaffected. The other arms of the junction demonstrate minor impacts. For those arms where EPN would add traffic, only the M6 northbound off slip operates above capacity. However, it would operate above capacity without EPN flows. National Highways concur with the assessment of 'no significant impact' and that EPN flows are minor compared to the existing baseline traffic in the 2024 and the 2034 DS scenarios. Notwithstanding this position and as agreed with the local highway authority, EPN will support the local highway authority by entering into agreement to review and optimise the signal timings of the junction to ensure the performance of the junction is not severely impacted in the future. This can be controlled by condition.

5.3.17 In additional to assessing and modelling J34 M6, the applicant has also undertaken an assessment of the Shrimp Roundabout to assess the effects of the development on the local network. Other junctions in and around the site were discounted and agreed with the local highway authority, largely due to the effects of dispersal. The Shrimp junction is a double roundabout comprising a 5-arm roundabout and a smaller 3-arm roundabout has been modelled to the satisfaction of the local highway authority. The outcomes of the modelling in terms of traffic impact is minor, but nevertheless, a mitigation scheme for this junction to improve traffic navigation which in turn would marginally improve queue lengths. The details of this can be controlled by condition.

5.3.18 Overall, the applicant has adequately demonstrated (with mitigation) that the traffic impacts of the proposal from the M6 to the site would not result in residual serve impacts on the safe and efficient operation of the SRN and local highway network. This is largely a consequence of the traffic demands being spread throughout the day avoiding the highway peak times and due to the utilisation of spare capacity within existing car parks. Rooting back to EPIL net-zero ambitions and substantiality ethos, the

traffic impacts over time should improve, with the modal split weighting more towards sustainable travel as the Travel Plan objectives and targets are met.

5.3.19 Servicing

The submitted TA indicates that EPN has a minimum local support target of 80%. This therefore reduces the need for servicing of the site by large vehicles. Instead, a service of small vans is expected to form the main vehicle type for servicing the site. This is with the exception of waste and recycling collections. The main service yard is to the northeast of the building, though some will be required to the front of the development. All routes for servicing will be via the promenade. This will be undertaken in a controlled manner (with automated bollard restricting general traffic to protect this pedestrianised route). The traffic impacts from servicing are not significant given the baseline of the existing Bay Arena Car Park, which will be lost as part of the scheme. The project retains and provides enhanced routes for emergency vehicles and those associated with the RNLI through improvements to the existing route between the site and the Midland Hotel.

5.3.20 Eden Outdoor Events

The applicant includes provision for a maximum of eight large music / concert style events each year, limited to the summer period only. These events are likely to attract around 6,000 visitors at any one time. This is substantially less than events such as the Morecambe Festival, which in comparison attracts around 55,000 people. These events will need event planning. For the purposes of planning, it is proposed that an Event Management Plan is controlled by condition capturing measures to manage and control traffic, parking and other considerations such as noise.

5.3.20 Construction Period

The proposed development anticipates a 2+year construction period. Subject to the outcome of this planning permission and funding, EPIL are hoping for a 2024 opening. Due to the scale of the development and its constraints position with the urban area of Morecambe, the management of construction traffic, maintained safe pedestrian / cycle corridors and the management of associated pollution will be critical. Construction traffic will fluctuate over the build period, with an indicative average number of daily vehicles in the region of 30 vehicles dropping to approximately 12 vehicles movements towards the end of the build programme. There will be an inevitable impact locally on the network while construction takes place. However, this can be mitigated to minimise the level of impact. It is proposed that a Construction Traffic Management Plan (CTMP) be prepared setting out a traffic strategy, construction vehicle routing, temporary footways and highway closures/diversions, access retention for surrounding operates and air and noise quality control. This is typical for most major development and is controlled by planning condition. The TA sets out some heads of terms for the CTMP, which will form the basis of the planning condition.

5.3.21 The submitted Environmental Statement has considered the residual effects (having considered mitigation) arising from the transportation considerations of this project. The only effects resulting in residual effects of negative significance relates to construction, road safety and traffic. Construction effects are temporary in nature with the effects on road safety and traffic direct permeant effects, ranging from minor to moderate negative significance. For road safety and traffic this simply highlights that the project will have an impact above the baseline (without EPN) this is largely owing to the fact that the sensitivity of users of the highway from both a safety and traffic perceptive is high. Following the ES methodology and approach to assessing the level of effect it is necessary to consider the magnitude of change. Considering the development proposals and the considerations set out above pertaining to traffic impacts and road safety the magnitude of change is low (in the case of road safety) and medium (in the case of traffic), resulting in residual effects of minor-to moderate negative significance and moderate to major negative significance respectively. The outcome here highlights the importance of environmental effects as planning material considerations in the decision-making process. In accordance with the submitted ES, the effects of traffic with a residual effect of moderate – major negative significance is regarded significant in EIA terms. This is reflected in the extent of assessment, review and consideration that this has been given by both the applicant, consultees and our recommendation.

5.3.22 Officers are mindful of the policy observations received to the application and their fundamental concerns in connection with the transport strategy and how this may not align with the policy expectations of the Climate Change Local Plan Review. Notwithstanding EPN's Transport Vision, for the purposes of this planning application, a realistic Transport Assessment had to be provided based on the opening year scenario. The proposed development will be more car dominant in the opening year;

however, the modal split assumptions remain lower than what would be expected for comparable visitor attractions. This is accepted based on the sustainability objectives of the project and how this will be managed through the parking strategy and travel planning.

- 5.3.23 In conclusion, whilst the development will result in an increase in traffic locally, the applicant has adequately demonstrated that the development will be safely accessible for all modes and will not result in severe residual impacts on the local highway network or the operation of the SRN. The Transport Strategy and Parking Strategy satisfactorily evidence that there is capacity and scope to accommodate the parking demands utilising existing infrastructure (with separate agreements) which must be supported by the essential advanced-dynamic booking system. This will ensure EPN control and manage visitor flows and direct to the most sustainable transport methods and times of arrival to meet their demands without adverse impacts to the network and the operation and attraction of the town more generally. Aligning with EPN Net-Zero Transport Strategy, their Travel Plan and its implementation will be essential to ensure modal shift for visitors as well as staff gradually improves above the baseline proposals. Measures to improve and enhance the public realm and walking/cycling environment are provided as part of the extensive landscaping proposals, as well as off-site highway improvement works along Marine Road Central between Central Drive and Northumberland Street. Overall, the proposed development is considered to conform to the policies set out in paragraph 5.3.1. Subject to the imposition of conditions and a legal agreement to deliver the mitigation described above, the local highway authority and National Highways offer no objection to the scheme.

- 5.4 **Consideration 3 – Townscape effects and Open Space** (NPPF: Chapter 12 (Achieving well-designed places), Chapter 15 paragraph 174 (Conserving and Enhancing the Natural Environment); Strategic Policies and Land Allocations (SPLA) DPD policies SP7 (Maintaining Lancaster's Unique Heritage), EN2 (Areas of Outstanding Natural Beauty), EN5 (Local Landscape Designations), SP8 (Protecting the Natural Environment) and EC5 (Regeneration Priority Area); Development Management (DM) DPD policies DM26 (Public Realm and Civic Space, DM27 (Open Space, Sports and Recreational facilities), DM29 (Key Design Principles), Policy DM38 (Development Affecting Conservation Areas), DM39 (The Setting of Designated Heritage Assets), DM45 (Protection of Trees, Hedgerows and Woodland), DM46 (Development and Landscape Impact) and DM57 (Health and Well-Being). and MAAP policies SP1 (Key Pedestrian Routes and Spaces) and DO2 (Strategic Leisure – Seafront Headland and Central Promenade). County Level: A Landscape Strategy for Lancashire, Landscape Character Assessment (2000) Seascape Character Assessment for the North West Inshore and Offshore Marine Plan Areas; Arnsdale and Silverdale AONB Landscape and Seascape Character Assessment

- 5.4.1 The above policies seek to promote high-quality designed development which conserves and enhances the locality, striking a balance between complementing the quality of the immediate townscape; the surrounding landscape features; and the dominant setting of Morecambe Bay. The site enjoys a remarkable prime location which will be a significant advantage to a project of this scale and importance. It is, however, necessary to ensure the impacts of the development on the townscape, seascape and visual environment are fully understood, including the impacts upon the Bay and on Morecambe Conservation Area.
- 5.4.2 The proposed development is significant in scale in comparison to the surrounding built form and therefore the visual impacts and potential effects on the character of the area will be striking. It is also reasonable to acknowledge that this site comprises previously developed land and has historically accommodated other substantial visitor and leisure attractions. In more recent times development proposals for the site included a comprehensive residential-led, mixed-use scheme which was refused by the City Council. In refusing that scheme, the design, heritage and townscape impacts were not considered unacceptable.
- 5.4.3 The application has been accompanied by an extensive Design and Access Statement setting out the design approach to the built development and the landscaping (amongst other considerations), as well as a Townscape, Seascape and Visual Impact Assessment (TSVIA) as part of the ES. The site itself is not located in any international, national or local landscape designation. The Arnsdale and Silverdale AONB is approximately 5.6km to the north of the site and the Forest of Bowland AONB is approximately 8km to the east of the site. Local landscape designations considered in the submitted TSVIA include three Key Urban Landscapes (KULs): Heysham Head, Torrisholme Barrow and Williamson Park. These were scoped into the assessment recognising the inter-visibility between the coastal edge or higher ground within the above KULs. The TSVIA also has regard to cultural heritage designations and nature conservation designations when assessing the effects on townscape, seascape and landscape.

- 5.4.4 At a National level the site falls within National Character Area (NCA) 31: Morecambe Coast and Lune Estuary, which is a relatively small and low-lying character area bordering Morecambe Bay. This Character Area is defined as being highly populated, with significant built form along the coastal edges, but encompassing areas of high tranquillity too. One of the key characteristics of NCA31 relevant to this proposal and assessment is the *coastal development that reflects a long history of a visitor economy and associated recreation, including the sea front facade at Morecambe, amusements and a promenade*. At the local county level, the site falls within the Industrial Age Urban Landscape Character Type (LCT). This is characterised by significant areas of Victorian and Edwardian planned development, characterised by distinct architectural character and street patterns, often in rectilinear or regular grid. The LCT is sub-divided into a number of Landscape Character Area (LCA)s, with the areas closest to Morecambe within LCA 12A: Carnforth-Galgate-Cockerham. This LCA supports a high proportion of built development including Lancaster and Morecambe. The TSVIA provides an extensive assessment of the LCAs/LCTs within study area around the site having regard to the Seascape Character Assessment for the North West Inshore and Offshore Marine Plan Areas, where the site is identified within Marine Character Area (MCA) 33: Morecambe Bay and the Arnside and Silverdale AONB Landscape and Seascape Character Assessment, with the AONB LCT H: Low Coastal Drumlins being relevant, as it encompasses parts of LCA12a, and AONB Seascape Character Type A: Intertidal Flats which includes expansive areas of Morecambe Bay within the AONB boundary.
- 5.4.5 Before assessing the impacts of the proposal on townscape, landscape and seascape, it is useful to provide details of the baseline conditions. The proposed site is bound by the promenade to the north, east and west, the Grade II* listed Midland Hotel to the south-west, areas of formal open space and public realm (Promenade Gardens, War Memorial and Gardens) to the south before reaching Marine Road Central. North of the site lies the RNLi building with notable historic buildings south of Marine Road Central, including the Grade II* Winter Gardens.
- 5.4.6 The site itself includes the central area of the former Bubbles and Dome sites, which is regularly used for festivals and seasonal fairgrounds and amusements. Part of this area sits in a depression (the former swimming pool) enclosed with concrete retaining walls with a vegetated, scrub embankment to the north providing access via steps to the promenade. The amphitheatre remains and rises to the eastern edge of the Bay Arena car park, which is relatively flat and open in character with modest planting. The Promenade Gardens comprise informal lawns and ornamental planting with seating and street furniture with quite distinct Scots Pine trees on the western boundary. The War Memorial gardens adjoin the southern boundary of the site. The listed War Memorial is enclosed by the gardens and hedgerows to create a space of peace and reflection. Public realm across the site, including surfacing treatments, is fragmented and not of high-quality. Notwithstanding this, it is a space enjoyed by the community and visitors alike and it retains an important social value. It equally benefits from extensive panoramic views along and across Morecambe Bay, towards the Lake District and the Arnside and Silverdale AONB, especially at the east and western ends of the site. The seascape character of the site and surroundings is relatively consistent. Key characteristics include areas of distinctive sea defence constructions, including the recently-constructed Wave Reflection Wall and the public realm works associated with this development, and the rip rap/rock armour defences around the Stone Jetty, the open character and extensive views that can be enjoyed and the presence of development along the coastline.
- 5.4.7 Existing land uses in and around the site are mainly leisure-based or retail/food and drink. The site is used on a temporary basis throughout the year to accommodate a travelling fairground, with tall rides, artificial lighting and noise adding to the character of the site. The promenade, the gardens an open space, the Stone Jetty and the Grade II listed former station building, which runs as a popular seafront café, have an extensive recreational offer complementing the more typical town centre shops/cafes and seafront amusements located opposite the site along Marine Road Central.
- 5.4.8 Potential Effects on Character
The regeneration and development of the site will result in a marked change from the current condition of the site and therefore will inevitably have some effects on the character of the townscape, landscape and seascape. Where effects are anticipated, mitigation should be encouraged through good design. In the case of the proposed development, the design concept embraces many of the key characteristics of the surrounding LCAs/LCTs, particularly those of MCA 31. Its whole philosophy is centred upon sensitive interaction and greater understanding of Morecambe Bay and how we interact with it. Some of the design considerations to assist in minimising the potential impacts on townscape, seascape, landscape and views include:

- the varied formation and massing of the shell pavilions conjoined by connecting buildings with an undulating “green/blue” roof form,
- the layout designed to represent a colony of shells within a dunescape landscape;
- the heights of the shell pavilions response to corresponding heights of the Midland Hotel (22.8m AOD) and the Winter Gardens (27.5m AOD);
- detailed consideration given to the materiality of the buildings;
- extensive, innovate and creative “coastal” landscaping proposed to provide a setting to the buildings and the wider public realm;
- lighting strategy to maintain dark corridors along the Bay;
- maintaining views out towards the Bay from the promenade.

5.4.9 The TSVIA has appropriately and robustly assessed the value, susceptibility to change and sensitivity each of the townscape, seascape and landscape receptors (including the range of character areas designed in paragraph 5.4.4). This recognises that the immediate townscape, conservation area character areas, coastal character areas and the AONB landscapes are likely to be affected the greatest by the development.

5.4.10 The potential effects on the character of the townscape, seascape and landscape can be neatly split into the construction phases and the operational phases. The construction phases would result in alterations to the townscape, not least by site clearance, vegetation removal, earthworks, formation of construction compounds, ancillary structure, lighting and noise. However, this phase of the development is relatively short-lived and can be mitigated to a certain degree by hoardings and an appropriate CEMP. On the whole it is accepted the significance of effect on the townscape character of the site and immediate surroundings would be judged ‘moderate adverse’ in the short-term. The effect reduces to negligible significance on the wider townscape (up to 7km). It is agreed that the significance of effect during construction would be minor-adverse to negligible in the context of the conservation area character areas, the marine and seascape character areas, the AONBs, national character areas and county landscape character areas/types.

5.4.11 The effects during operation relate principally to the construction of new built development and the proposed new landscaping areas, together with increased use of this underused part of Central Morecambe. The submitted, verified photomontages help illustrate the development sitting within its surrounding context. The proposed buildings are substantial in size and massing and will result in comprehensive alteration of the townscape character. However, the development replaces an area of previously development land of limited townscape value, comprising unused buildings/structures and poor-quality public realm; it maintains and reinforces separation between the new development and the existing built environment; maintains views and vistas from the built environment over the Bay, adopts a high-quality unique and contemporary form and design that takes influence from the Bay, includes comprehensive, high-quality, innovative and creative landscaped areas which enables cohesion between the built development and the natural environment and fundamentally aims to deliver a new landmark for the town. Overall, it is considered that EPIL have adequately demonstrated that the potential impacts on townscape character can be mitigated. The conclusions drawn in the ES that the of effect arising from the development on the character of the townscape, seascape and landscape would range between major beneficial (the site and immediate townscape), moderate beneficial (western part of Conservation Area) to minor beneficial (NCA/NCT) and negligible effects (wider Conservation Area, KULs, AONBs and the MCA) are reasonable conclusions.

5.4.12 Potential effects on the visual environment

The TSVIA in assessing the visual impacts of the proposal, a number of different viewpoints have been considered based on locations where different visual receptors will experience views of the development from within the 15km study area. Eighteen representative viewpoints have been assessed in agreement with the LPA and both AONB Partnerships. A selection of verified photomontages are included in the ES as part of the TSVIA. Like the assessment on character, the visual assessment considers sensitive receptor, potential impact on views during construction and operation and the potential impacts and significance of effects during both phases of development. Receptors include persons and cyclists on the promenade, persons using the open space including local attractions such as Torrisholme Barrow, Ashton Memorial and Heysham Coast), residents including the Midland Hotel, visitors and workers of the commercial uses near the site, persons on nearby by public rights of way and motorists.

5.4.13 During construction, it is inevitable that views for all receptors will be negatively affected for a short-term and on a temporary basis. Directly on the site there will be an immediate loss of open space so previous

views from these areas will be obliterated. Outside the site, the existing views will be replaced with views towards a construction site and all its associated infrastructure. However, to a certain degree, this can be mitigated with the use of consistent hoardings around the site boundary. The greatest impacts will be experienced by those receptors closest to the site where it is considered the significance of effect is moderate adverse. This would include those at the RNLI building, the Midland Hotel, the War Memorial and on the Lancashire Coastal Way and other receptors close to the site. The further away from the site receptors are the significance of effect on receptor views will reduce.

5.4.14 The potential impacts on views during operation are more significant due to the developments permanence. A description of the development and its positive design attributes have already been set out within this section of the report (and earlier). EPN would introduce a new and distinctive landmark into views from the site and its surroundings, which could have a positive impact on views. The verified photomontages illustrate the positive impact the development could have. This is most notably felt close to the site and as you sequentially view the project along the promenade. In the short distance views the development is likely to affect the majority of the view. As receptors view the site from further away, the development will begin to affect a smaller proportion of the view.

5.4.15 A critical component of the project is its landscaping. During the pre-application stages, officers were keen to deliver a contemporary and innovative project that could still sit comfortably within its existing built environment, particularly given the cultural heritage assets surrounding the site. In views close to the site, it is considered that the proposed landscaping, especially the dunescape roof and raised coastal edge, helps break the massing and scale of the new buildings, anchoring them to the ground and providing a graduated interface between the development and the existing public realm. This is notable in views from Northumberland Street and from Marine Road Central opposite the Midland Hotel, where the landscaping will perform an important role in softening the setting of the new structures, enabling the buildings to contribute positively in the representative views that have been assessed. In views from the Stone Jetty, the development would be highly prominent and would introduce a large form of development much greater in scale than surrounding development. It would also screen the Winter Gardens from this view resulting in a negative impact. Nevertheless, due to the innovative nature of the scheme and its integral landscaping proposals, it is considered to have a 'moderate positive' impact overall. The sequential views, when viewed from the promenade, generally provide positive impacts, although at one viewpoint the Midland Hotel - an equally iconic building, is lost from the view resulting in some negative impacts.

5.4.16 The TSVIA concludes 'major' or 'moderate' beneficial significance of effect on views close to the site, including from the Midland Hotel, Winter Gardens, The Platform, the NCR 700, the promenade, Stone Jetty and Northumberland Street. Further away from the site the visual effect reduces. Longer distance views from the AONB are considered negligible; a conclusion that is supported by the AONB Partnership who have raised no objection.

5.4.17 The effects of the development on the night-time character and views during construction and operation have also been considered in the assessment. Lighting during construction will have some impacts but with appropriate mitigation the effects can be minimised. The development (once operational) will result in increased artificial lighting both externally and internally. This will be varied across different parts of the site (as set out in the lighting strategy). It is also anticipated that light will emanate from the buildings due to the opaque character of the shell pavilion cladding. This will be most noticeable at night-time and will inevitably introduce additional sky glow to the townscape and seascape character. However, given its position along the seafront of Morecambe where there is existing lighting and sky glow already, the development would not result in an unacceptable impact. Whilst it would be a notable feature at night-time, the implementation of the proposal lighting strategy will help mitigate potential adverse effects.

5.4.18 Overall, Officers are satisfied and concur with the conclusions drawn in the submitted TSVIA and ES regarding the effects of the development on the character and visual amenity of the townscape, seascape and landscaping during construction and once operational. On this basis, the proposals are considered to conform with policies DM29 and DM46 of the DM DPD.

5.4.19 Open Space

Notwithstanding policy DO2 of the MAAP, strategic policy SC3 and policy DM27 of the DM DPD seek to protect and retain existing designated open space. There are three areas of open space within the site that will be replaced by the development. This includes the promenade gardens, including the War Memorial (which will remain in situ), amenity greenspace on the site of the former bandstand, and the

outdoor arena. The promenade gardens, excluding the War Memorial Garden, will form part of a new public area of open space referred to as the Energy Field. This landscaped area will form a new dynamic, creative and active space for visitors of the attraction as well as the public. New landform mounds will be formed which will provide areas of natural play, as well as seating areas integrated into the Energy Pods. The area will be complimented by new planting with water features, which shall form part of the site's sustainable drainage strategy. This will result in enhancements to this area of open space. The existing amenity greenspace (Harbour bandstand area) will be reduced in size (in terms of the area that would be available to the public) by the development. The paid boundary of the development penetrates into this designated amenity greenspace. It will be replaced with an alternative landscape approach, including a lawned area across two levels, a shingle plaza, informal seating (concrete pebbles), cycle provision, and more formal seating areas wrapping around the edge of the Tide Gardens. Overall, the reduced area of open space is outweighed by its replacement with high-quality landscaping which will contribute to the visual amenity of the area and potentially produce an external space that can positively contribute to local health and wellbeing. The existing outdoor arena public open space (POS) will be lost to the development. The replacement proposals include extensive landscaping and the provision of a much larger outdoor arena. Its design is exceptional; however, this area falls within the paid boundary of the attraction and will not be publicly available all the time. In accordance with policy DM27 and DO2, it is considered that the public benefits of the project, including enhancements to retained open space land, would outweigh the loss of this area of public open space. On this basis, the proposal conforms to the above-mentioned policies in respect of open space provision.

5.5 **Consideration 4 - Cultural Heritage (NPPF: Chapter 12 (Achieving well-design places), Section 16 (Conserving and enhancing the historic environment); Strategic Policies and Land Allocations (SPLA) DPD policies SP7 (Maintaining Lancaster's Unique Heritage), EC5 (Regeneration Priority Area); Development Management (DM) DPD policies DM38 (Development Affecting Conservation Areas), DM39 (The Setting of Designated Heritage Assets) and MAAP policy DO2 (Strategic Leisure – Seafront Headland and Central Promenade); Morecambe Conservation Area Appraisal.**

5.5.1 Strategic policy SP7 (SPLA) states that '*Lancaster District has an extraordinarily rich and varied historic environment*' and that its heritage assets shape the district's distinctive identity. Policy S07 requires the Council, as well as fulfilling its statutory duty, and amongst other requirements, to protect and enhance local heritage assets and to maximise opportunities to reinforce the district's unique identity and the wider enjoyment of the historic environment.

5.5.2 Due to the scale of development and potential impacts of the proposal, the effects of the development on the surrounding historic environment is scoped into the Environmental Statement. Within the study area (500m) there are a number of designated heritage assets. The application site lies within the Morecambe Conservation Area. There are also several designated heritage assets surrounding the site, which include:

- Grade II listed War Memorial
- Grade II* listed Midland Hotel
- Grade II* listed theatre Winter Gardens
- Grade II Stone Jetty Former Station Building and Lighthouse
- Grade II The Clock Tower
- Grade II Morecambe Railway Station Main Building
- Grade II 217, 219 and 221 Marine Road Central; and
- Grade II Wall and 2 pairs of entrance piers enclosing south-east side of car park of Midland Hotel

5.5.3 When assessing development that affects designated heritage assets the Council must demonstrate it fulfils its statutory duty. This is provided below:

The local planning authority in exercising its planning function should have regard to s66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, which states "*In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have **special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses***"; and s72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990,

which requires ***special attention to be paid to the desirability of preserving or enhancing the character or appearance of that area.***

- 5.5.4 This legal framework to *preserve* and *enhance* is reflected in national and local planning policy. Paragraph 197 of the NPPF provides the starting point for determination planning application that affect heritable assets. It requires the local planning authority to take account of:
- a. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b. the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - c. the desirability of new development making a positive contribution to local character and distinctiveness.
- 5.5.5 The proposed development will result in effects on heritage assets during the construction period and once the operational phase. It is considered that there will be adverse effects on the setting of designated heritage assets and on the character and appearance of the Conservation Area during construction period. Mitigation is re-proposed to minimise impacts, primarily through the implementation of a Construction Environment Management Plan and a lighting strategy. It is accepted that these impacts are temporary and short-term and would not prohibit the proposed development. This section of our recommendation focuses on the operational impacts of the development on the historic environment.
- 5.5.6 The site lies within Morecambe Conservation Area. Morecambe began as a small fishing village which grew to incorporate the medieval settlements of Bare, Poulton and Torrisholme. In the early-mid 19th Century the Northern Railway Company established the railway station on the jetty to serve the port, which led to the construction of the first Midland Hotel in 1848 and prosperity grew within the construction of the Central Pier and West End Piers (c1870 and 1890 respectively). When the port closed (early 20th century) it became a breakers yard. Following the construction of the second Midland Hotel (1933), the proposed site accommodated the Super Swimming Stadium (1936) and the tourism industry boomed. The positive fortunes of the British seaside resort continued until the rise of alternative package holidays, predominantly in Mainland Europe, and as a consequence many resorts experienced a sharp decline in footfall and in prosperity.
- 5.5.7 The Conservation Area derives its character and significance from the narrative of the town, its historical associations with leading lights of music and theatre, together with its relationship with the Bay. The proposed site sits in a prominent position within the Conservation Area, and it fails to make a positive contribution to the significance of the heritage asset. It is an area of reclaimed land that has a rich history and has changed considerably over the last 200 years. Despite such changes the land has typically provided a public use of community value.
- 5.5.8 The Midland Hotel and Winter Gardens are designated assets of the highest significance of national importance. The proposed development will affect these designated heritage assets, by virtue to its siting and scale and intervisibility between the two.
- 5.5.9 The Midland Hotel was constructed in 1933, replacing an earlier hotel, designed by the Architect Oliver Hill in a *Streamline Moderne* architectural style. Its significance derives from its exuberant and sharp statement of 1930s modernity – its bright white walls, curved plan-form, and regular and repetitive fenestration arranged in horizontal bands. It was purposefully designed with its convex wall facing out toward the sea to benefit from the expansive views across the Bay. Its iconic status was illustrative of the ambition to combine the series of smaller settlements and create a vibrant tourist resort.
- 5.5.10 With the exception of the RNLI life boat building and the grade II listed station building on the Stone Jetty, the Midland Hotel is the only substantial building to the north of Marine Road Central. The land to its east (the application site) forms part of its setting. Not dissimilar to the proposed development, at the time of its construction it would have been a pioneering building, bold in design and very much alien to the existing building in Morecambe.
- 5.5.11 The Winter Gardens was built in 1896 as the Victorian Pavilion Theatre and commands a prominent seafront position directly opposite the proposed site. Its architecture is also designed to embrace the panoramic views over the Bay. The Winter Gardens derives its significance also from its extravagant

and ornate frontage of terracotta and its elaborate interior including its vaulted ceiling. It is also one of the most extravagant theatres built in the heyday of the 19th century British seaside.

5.5.12 In assessing the potential impacts, policy DM38 (relating to conservation areas) requires development in conservation areas or preserve and enhance its character and appearance, specially requiring proposals to:-

- respect the character of the surrounding built form and its wider setting, in terms of design, siting, scale, massing, height and material used;
- not have unacceptable impacts on the historic street patterns/boundaries, open space, roofscape, skyline and sting including views into and out of the area;
- not result in the loss or alteration of features which contribute to the special character of the area; and
- uses that are sympathetic and appropriate to the character of the existing building and will not result in a detrimental impact on the visual amenity and wider setting of the conservation area.

5.5.13 Policy DM39 relates to development affecting the setting of designated heritage assets. Fundamentally, this policy requires there to be a good understanding of the heritage assets and their settings to enable an assessment of the effects of the proposed development. This policy states that the Council '*will look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance*'. It goes on to state that '*development that preserves those elements of the setting that make a positively contribution or better reveal the significance of the assets will be treated favourably*'. Policy DO2 of the MAAP equally requires new development to relate well to heritage assets and contribute to enhancing the public realm. In accordance with the NPPF and these local plan policies, the application and ES has been accompanied by a Heritage Statement.

5.5.14 The proposals will undoubtedly have an impact on the character and appearance of the Conservation Area, through the introduction of four substantially large buildings and their connecting structures and associated landscaping, together with the increased use of the site. However, no important features that contribute to the value of the Conservation Area would be lost. Some views from within and adjacent to the application site, looking back towards the historic coastal townscape, would be interrupted by the development (Stone Jetty viewpoint), whilst others would retain existing townscape views with the development adding interest and creating a sense of vitality once again. The scale of effect is considered 'minor adverse' but not significant in terms of environmental impact (EIA).

5.5.15 The site stands apart from the continuous developed Victorian and early 20th century town frontage. The site, whilst currently open in character and affording views across the Bay, is largely redundant and constitutes poor quality public realm and is not considered to contribute positively to the character and appearance of the Conservation Area. Like the Midland Hotel in the 1930s, the proposed development will introduce a further landmark building of pioneering design for the 21st Century. As a visitor attraction, the use would equally reinforce the historic character of the site and wider area.

5.5.16 The development responds well to its setting with a bold and active frontage to the southern promenade (facing in towards the town centre) to deliver an exciting and vibrant space. The northern façade at promenade level is less active at the ground floor level (largely due to the internal layout and the functionality of the attraction), however, this is mitigated by extensive planting and the provision of additional seating areas to be available to the public. The upper levels of the shell pavilions to the west and northern elevations provides extensive glazing which blends with the terraced areas and landscaping to create an interesting and cohesive composition. Its design ensures the development responds to its exposed position in all orientations. The landscaping is equally innovative and provides a pleasant interface between the buildings and the sea. The whole design concept maintains a distinct relationship with the Bay, which is clearly a special character and setting of the Conservation Area. Overall, the proposed development would preserve and enhance the character and appearance of the conservation area in compliance with policy DM38 and DO2, together with the requirements of the NPPF.

5.5.17 The relationship of the project to the Midland Hotel has been at the forefront of the design concept and was a key issue raised during pre-application discussions. The proposed development is located c78m from the closest part of the connecting dunescape building (entrance) and c100m to the closet shell pavilion. The intervening land (as proposed) comprises high-quality comprehensive landscaping, which purposefully responds to the circular arrangement of the Rotunda bar and terrace, providing scope for the proposed new lawn to be potentially used by patrons of the hotel. The existing public realm around

the Hotel is fragmented and untidy and does not positively contribute to the hotel's setting. The proposed development provides a more legible and attractive space around the hotel which provides benefits to the significance of the setting of the Midland Hotel.

- 5.5.18 The Midland Hotel's standalone position, separated from other development, is one of its most distinguishing characteristics which positively contributes to its setting. This can be experienced in long and short distance views (south and east) and in particular as you sequentially view the hotel walking along the promenade. The introduction of a large new development near the hotel will undoubtedly affect the significance of this distinct separate character and therefore the setting of this designated heritage asset. While the development has been carefully designed to respect the setting of the hotel it is inevitable that it will lead to a degree of harm as the new development will (in some views) dilute the prominence of the listed hotel. In close distant views the distinct separate character is preserved, however, some views to the east (and close to the site), of the hotel are likely to be largely obscured. The other photomontages indicate that the Midland Hotel would remain in view from the grade II listed Clock Tower onwards, with the development framing this view. From the south, the development would be less prominent, forming a less intrusive backdrop to the hotel. Views from the hotel would be affected but not adversely, given the degree of separation and views to the north would be largely maintained. The development would therefore result in moderate harm to the setting of the Midland Hotel. This is balanced against the benefits brought about by the improved public realm and landscaping immediately around the listed hotel, therefore the overall level of harm arising from the development would amount to less than substantial harm.
- 5.5.19 The proposed development is not considered to affect or sit within the immediate setting of the Winter Gardens. However, it will affect its wider setting. The layout of the proposed development has purposefully ensured the development does not sit in the immediate straight-line of the Winter Gardens. Instead views from the Winter Gardens will look over the Rhythm Gardens, which provides the outdoor arena (of a larger scale than existing) that reinforces the theatrical and historical associations with the Winter Gardens. Marine Road Central separates the site from the designated heritage asset with the Winter Gardens directly overlooking the Bay Arena car park. Due to the low-lying nature of the surrounding uses and character of land, the Winter Gardens enjoys panoramic views over the Bay from the upper terrace/gallery. The proposed development will affect these wider views, with the shell pavilions and connecting structures interrupting peripheral views to the west. The field of vision would be narrowed. It is anticipated panoramic views to the west would affect the inter-visibility from the first floor viewing gallery of the winter Gardens with parts of the promenade and the Stone Jetty.
- 5.5.20 Overall, the introduction of the proposed development is considered to have a positive impact on the Winter Gardens by introducing improved public realm and landscaping in its wider setting and adding drama and vitality back into this Central Attraction area of the Conservation Area and wider town. The use of the Rhythm Gardens for holding large events during the summer months would not have a harmful impact of the setting of the theatre - rather it would serve to reinforce their mutual function and purpose. While the new landscaping involves increased land levels toward the northern coastal edge (Glade Café Deck), it is design in creative and innovate and would add interest to the setting of the Winter Gardens. While the development will be visible in views from the frontage and upper gallery areas of the Winter Gardens (to the west), the proposals would continue to preserve the inter-relationship between the Winter Gardens and the Bay and Lake District beyond. Furthermore, it is considered that the proposed enhancements to the public realm and the visitor attraction itself, may provide an exciting opportunity to reinvigorate the Winter Gardens as a destination in its own right, thus complementing the wider visitor offer in Morecambe. Historic England contend the level of harm to be less than substantial whereas the Council's Conservation Officer contends the proposals would not harm the setting of the Winter Gardens. There is a degree of harm identified in terms of inter-visibility between the heritage asset and the western parts of the promenade and stone jetty. However, it is likely that the proposal will invigorate the site with life and activity and enhance the public realm, which far exceeds the retention of the current, poor visual character of the existing site. Therefore, on balance, officers contend there to be no harm.
- 5.5.21 The application site has a very close relationship with War Memorial (Grade II) and as such the impacts of the development will be significant. The Memorial was constructed in granite and bronze and was completed in 1921. Its stepped base inscribes the names of the fallen from World War I and World War II. The Memorial is set back from the road and is enclosed within a stone circular dwarf wall with small remembrance gardens to the east and west, forming its immediate setting. While the gardens offer peace and tranquillity for those paying their respects, it is acknowledged that the asset sits in a busy

area affected by passing traffic/visitors and the noise/activity associated with temporary uses (such as the fair) on the existing site.

- 5.5.22 The significance of the Memorial lies with its historic interest and has community value. This will not be lost as part of the development. The development will not directly impact the immediate setting of the Memorial, but it will impact its wider setting. This impact is considered to be beneficial because of the positive enhancements the wider setting of the heritage asset through the site's regeneration. The layout and design of development has purposefully ensured there remains association between the Memorial and the Sea. This is achieved by the juxtaposition of the shell pavilions with the Bay Hall and Bay Glade interface aligning with the Memorial – offering a line of sight out towards the sea and the associated skyline. Furthermore, the project will draw large numbers of visitors, who will be passing the Memorial, and as such its presence and function of memorial could be enhanced. Overall, the proposed development is considered to have a positive impact on the setting of the Memorial.
- 5.5.23 The immediate setting of B&M (Woolworths Building) and CB Warehouse (Littlewoods Building), both Grade II listed, remain unaltered. The significance of these buildings largely relates to its association with the Midland Hotel and its architectural style. The positive visual relationship with the Midland Hotel will continue and all three buildings would continue to be seen together as a legible group of 1930s buildings, continuing to make a positive contribution to the character and appearance of the Morecambe Conservation Area. The redevelopment of the Central Promenade site can only enhance the regeneration potential of these important buildings opposite.
- 5.5.24 The submitted assessment has robustly considered other heritage assets surrounding the site, including The Platform, the Clock Tower and the Stone Jetty former station building. In all cases the scale of effect was either minor adverse or negligible. Officers concur with the conclusions and overall do not consider the development, on balance, to cause harm to the settings of these heritage assets.
- 5.5.25 The special duties in relation to listed buildings and conservation areas under section 66 and 72 of the 1990 Act are reinforced within the NPPF, which states that great weight should be given to the conservation of heritage assets (NPPF 199) and account given to the desirability of sustaining and enhancing the significance of heritage (NPPF 197). These national policies are reflected in the Council's DM DPD Policies DM37, DM38 and DM39 which require sympathetic development that avoids harmful impacts, while ensuring any harm is appropriately justified.
- 5.5.26 In conclusion, it is considered that the proposed development will make a positive contribution to the Conservation Area adding drama and interest back into what is currently a poor and uninviting part of the town. It will reinforce and reinvigorate the town as a seaside resort for the 21st century, linking to its historic associations and having a good appreciation of the historic environment. The proposal therefore complies with paragraph 197 of the NPPF, policy DM38 of the DM DPD and policy DO2 of the MAAP. It is considered, however, that the proposed development would amount to less than substantial harm through impact on the contribution setting makes to the significance of the Grade II*Midland Hotel. Paragraph 202 of the NPPF states '*where a development proposal will lead to less than substantial harm to the significance of a designated heritage assets, the harm should be weighed against the public benefits of the proposal...*'. This is a matter to weighed in the planning balance, however, it is likely that wider public benefits will also include heritage benefits of significantly enhancing the quality of the site and the setting of other designated heritage assets.
- 5.5.27 Finally, it should be noted both Historic England and the Council's own Conservation Officer raise no objections to the proposals, with the project also supported by the Civic Society.

5.6 **Consideration 5 – Natural Environment** (NPPF: Chapter 15 paragraph 174 and 179-182 (Habitats and biodiversity); Strategic Policies and Land Allocations (SPLA) DPD policies SP8 (Protecting the Natural Environment) and EN7 (Environmentally Important Areas); Development Management (DM) DPD policies DM44 (Protection and Enhancement of Biodiversity), DM45 (Protection of Trees, Hedgerows and Woodland) and DO2 of the Morecambe Area Action Plan (MAAP)).

- 5.6.1 The NPPF (paragraph 174) requires '*planning policies and decisions to contribute to and enhance the natural and local environment by: ... (amongst a number of criteria) minimising impacts on and promising net gains in biodiversity...*'. Paragraph 180 then sets out the criteria for assessing planning applications requiring LPA's to apply a number of principles which fundamentally aims to avoid significant harm to biodiversity. Policy SP8 of the SPLA DPD echoes the NPPG and requires proposals to protect, maintain

and enhance the districts biodiversity, recognising the importance and value important landscapes, species and habitats contribute to the natural environment and the district's unique qualities. Policy DM44 of the DM DPD will be particularly pertinent in the assessment of the proposal. In summary, this policy requires the following:

- Proposals should protect and enhance biodiversity
- There should, in principle, be a net gain of biodiversity
- Where harm is identified, it should be mitigated, or as a last resort, compensated for. Where there is significant harm planning permission should be refused.
- Development affecting Internationally Designated Sites must ensure the integrity of the internationally important sites are protected.
- Ecological networks should be retained, protected and enhanced.

Policy DO2 equally states proposals that would result in significant adverse impacts on the Bay environment will not be permitted and requires projects to appropriately assess (and where appropriate) mitigate against potential impacts. Additionally, the requirements of the Conservation of Special and Habitat Regulations 2017 (as amended) is relevant. This places a duty of the LPA to ensure as part of exercising its planning function, the authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any statutory designated sites.

5.6.2 While the applicant has undertaken an extensive assessment of designated sites within 20km of the site, the most relevant are those that are close to the site. The application site lies adjacent to the following statutory designated nature conservation sites:

- Morecambe Bay Special Area of Conservation (SAC)
- Morecambe Bay and Duddon Estuary Special Protection Area (SPA)
- Morecambe Bay Ramsar
- Morecambe Bay Site of Special Scientific Interest (SSSI)

The SPA and Ramsar designations form part of a series of coastal estuaries of outstanding importance supporting numerous species of wader, wildfowl and seabird species, in particular over-wintering birds. The SAC is designated for a range of intertidal habitats as well as its great crested newt population. While there are other designated sites nearby, these are the principal sites relevant to assessing impacts on ecology against the project. The site itself is not designated for any nature conservation interest. In support of (and to inform) the application and ES, an extended Phase 1 Habitat Survey, Tree Survey, Bat Roost Surveys, Nocturnal Emergence/Re-entry Surveys and a Wintering Bird Survey have been undertaken. The application has also been accompanied by a shadow Habitat Regulations Assessment (as amended).

5.6.3 The application site extends to approximately 4.8 hectares predominately made up of hardstanding (2.41ha) with remains land comprises areas of amenity grassland and shrub scrub. There are 12 individual trees and 7 groups of trees within the site. There are existing buildings on the site which are proposed for demolition. The small pockets of habitat and ecological features across the site are fragmented and unmanaged. At the time of surveying the buildings, no bat roosts were identified and the buildings present had low to negligible suitability for roosting bats. No bats were identified using or roosting in the trees and as such the effect of the proposal on protected bats is limited. Apart from shrub habitat near the Midland Hotel and a small number of trees, the site has little potential to support breeding birds. On the whole the site is considered to be of low ecological value and would not constrain the development of the site.

5.6.4 EPN proposes to deliver an extensive landscape scheme that includes species mixes which are similar to coastal priority habitats, with the intention of increasing the botanical and invertebrate value of the site, whilst demonstrating to visitors the dynamic nature of coastal ecosystems. Securing the landscaping is an integral component of the project and its mission to education and raise awareness of the ecological importance of Morecambe Bay. The proposed landscaping will deliver significant net gains in biodiversity (41%) on site, which will mitigate the temporary, short-term impacts of habitat loss during the projects construction and provide substantial enhancement once the development is completed. GMEU have noted some potential disagreement over the Biodiversity Net Gain (BNG) figure, but in any case, are satisfied that this would far exceed the minimum 10% target that is required through the Environment Bill. This aspect of the scheme fully conforms with policy DM44 of the DM DPD.

5.6.5 Turning to the effects of the proposal on the adjacent designated sites, this is a significant material consideration, and at the request of the LPA it has been the subject of detailed pre-application discussions with Natural England. The submitted shadow HRA has been updated and amended during the application to address concerns raised by GMEU. It is the updated sHRA that has informed our Appropriate Assessment of the development. Although the site itself does not provide habitat for birds associated with the SPA and Ramsar site, significant aggregations of SPA and Ramsar birds were recorded in the surrounding area during winter bird surveys, backed up by desk based records. Significant numbers of these species rarely use habitats within 250m of the site and the nearest large roost sites are 700m - 1.2km from the site. Significant numbers of turnstone occasionally roost on the Bubbles Breakwater directly north east of the site.

5.6.6 Due to the scale of the development, its proximity to the designated sites and the anticipated number of visitors the project will attract, several potential impacts (having regard to embedded mitigation) have been screened into the HRA. The main impacts and mitigation are listed below:

Impact	Type	Mitigation
Loss or degradation of SPA/SAC/Ramsar habitat	Waterborne Pollution pathways / hydrological linkages	Construction Environmental Management Plan (CEMP) (for construction), foul and sustainable surface water drainage schemes.
	Airborne Pollution pathways	CEMP to maintain acceptable pollutant levels, placement of hoardings.
Disturbance to SPA/SAC/Ramsar birds	Visual effects, noise and lighting disturbance during construction	Lighting strategy Crane locations to be controlled/limited Limiting potentially disturbing construction works during periods of prolonged cold weather in the winter (shut-down protocol)
	Recreational disturbance	Outreach and Education Strategy
	Noise disturbance - operational (events)	Limiting events to summer period only Lighting strategy
Injury or fatality of SPA/SAC/Ramsar birds	Collision /bird strike	Timber structure and opacity of cladding.

The sHRA has assessed whether the potentially significant impact pathways (listed above) would have a likely significant effect (LSE) on the integrity of the designated site as a result of the development, having had regard to the conservation objectives and their qualifying features of each of the statutorily protected sites.

5.6.7 To mitigate against the potential impacts during the construction phase of the development a comprehensive CEMP is proposed. The CEMP needs to include the following:

- Airborne pollution – standard dust prevention measures.
- Noise/Visual – The use of acoustic hoardings and on-site standard management, working hours, silencers.
- Visual – avoid crane arm radii over the coast or phasing to prevent this from occurring in winter periods.
- Light – a construction lighting scheme should be provided to show light spillage and phasing approach to avoid construction lighting across the dark corridor (indicatively shown a large scale in Figure 9 of sHRA).
- A severe weather stoppage protocol and toolbox talks to contractors.

In addition to (or forming part of) the CEMP, there is a need for a scheme to manage surface water and water quality during construction. The CEMP can be secured by planning condition.

5.6.8 During the operational phases of the development LSE from waterborne pollution can be adequately controlled and mitigated as part of new sustainable surface water infrastructure and foul drainage systems on site. The applicant indicates that United Utilities have confirmed an allowable discharge for the foul water, and that the water treatment infrastructure has capacity to deal with the additional loads

from the development. UU have not indicated otherwise in their consultation response. Surface water is proposed to be dealt with either via infiltration or discharge to the existing culvert, which will provide pollution mitigation as per necessary guidance (CIRIA SuDS Manual). The provision of foul and surface water drainage scheme can be secured by planning condition.

- 5.6.9 The impacts on air quality from construction plant and traffic is expected to be negligible with no significant air quality impacts predicted on the designation sites during construction. However, to be certain this remains the case, standard mitigation in accordance with Institute Air Quality Management (IAQM) guidance is proposed. This can be captured in the CEMP. The effects of the development on ecological receptors from air quality (once operational) has been assessed in the submitted Air Quality Assessment and summarised in the sHRA. While there are some exceedances in pollutants anticipated for the opening year (but none for the future year 2039) the impacts are minor and given the qualifying features of the SPA are generally tolerable to the pollutants modelled (for example nitrogen) air quality impacts during the operation of the development would not adversely affect the integrity of the designated sites.
- 5.6.10 In terms of the effect of the development on disturbance of qualifying features of the designated sites, it is important to note a number of key skears (areas of hard substrate - boulders and cobbles) surrounding the site that are used by the SPA birds. During the 2019-2020 winter bird survey the largest numbers of feeding birds were recorded on the skears (compartment C6), with peak counts of 120 dunlin, 1,850 knot and 975 oystercatcher recorded on the skear to the north east of the site (closest part of skear 380m from site). During the 2019-2020 winter bird survey the large majority of roosting birds were recorded to the south and west of the site. However, a small number of wading birds were observed roosting on the Bubbles Breakwater (the flood defence breakwater structure extending from the northern edge of the site) at high tide.
- 5.6.11 It is known that different birds have different tolerances to noise and visual disturbance effects, but typically it is considered that such effects are likely within 250 metres. Visual disturbance is anticipated during construction, in particular from the mobile/crawler cranes needed to construct the timber superstructure. These will only just extend over the adjacent rock armour and not over the Bubbles Breakwater. Given the known tolerance and rapid habituation of the turnstone (SPA bird most affected), it is unlikely that this would deter the birds from roosting in this location. Nevertheless, the precise locations of the cranes and their radii shall be controlled as part of the CEMP. The CEMP will also capture mitigation to limit noise from the construction site, such as piling techniques and acoustic hoardings at 2.4m high. In terms of noise, there are likely to be some effects by increased noise during construction but such would not be significant, bearing in mind the baseline noise levels are already relatively high, with the birds already habituated to sudden noise levels. Birds are less tolerable to disturbance in prolonged cold weather conditions and as such a shutdown protocol is proposed. The details of the stoppage protocol will be set out in the CEMP. This would follow best practice guidance (in line with Joint Nature Conservation Committee (JNCC) guidance) and would entail a temporary cap placed on high disturbance construction activities (to be defined in the CEMP but as an example includes use of excavators, pile driving, use so dozers and tippers etc) in the event freezing conditions occur for 7 consecutive days (based on national and local weather station data) for a maximum period of 14 days.
- 5.6.12 Noise and visual effects in the operational phase are limited to the buildings themselves, the open air events and recreational disturbance. To avoid LSE on the integrity of the designated sites, the applicant only proposes to hold open air events during the summer months. This shall be limited to a maximum of eight events. This will ensure no impacts on the qualifying feature of the designated sites and can be controlled by planning condition. Impacts deriving from artificial lighting will be controlled by condition too and will align with the submitted lighting strategy. This seeks to maintain a dark corridor on its coastal edge where light levels will not increase above 0.5 lux higher than the base line lighting levels. With this mitigation, there will be no significant adverse effect on the integrity of the designated sites as a result of lighting impacts.
- 5.6.13 Recreational disturbance effects on the designated site is something that the LPA have become very familiar with, with most proposals within close distance to the designated sites having to secure mitigation (such as in the form of homeowner packs). The Morecambe Bay Disturbance and Access Management Report (Liley et al., 2015) was commissioned by the Morecambe Bay Partnership, and presents the results of a study on recreational disturbance to birds around Morecambe Bay. This found, unsurprisingly, that Morecambe Seafront was found to have the highest number of potentially disturbing activities observed across 15 across of the Bay. 50% of the observed activities related to dogs and dog

walkers. The submitted HRA provides extensive analysis and assessment of the areas used by birds and recreational disturbance. Their own winter bird survey (2019-2020) evidenced a large amount of disturbance in the study areas resulting in birds taking flight in response to dog walkers and other walkers along the coast of Morecambe.

5.6.14 There are considered to be two types of recreational pressures that may occur as a result of the proposed development during the operational phase:

- Direct pressures on birds on the actual day of visit – due to dogs or other recreational activity; and
- Diffuse pressure on birds using other areas around the Bay arising from extra stays in the areas – again from dogs and other activities, such as water sports.

The applicant has carried out visitor modelling work to establish the visitor profile. This concludes 76.3% of visitors will be day visitors and 23.7% overnight visitors, mainly at peak times. The average visit duration to the attraction is established between 3-4 hours. As the main impact relates to the effects by dogs, the applicant has then determined the number of visitors likely to be bringing a dog with them. The attraction will not permit dogs therefore it is assuming only overnight visitors may bring their dogs. Of those overnight visitors staying locally (estimated to equate to 65,000 visitors a year) and based on evidenced dog ownership data, this would equate to 5,600 dog stays in the region. It is not assumed that all overnight visitors owning a dog would bring a dog, therefore the 5,600 is a worst-case scenario. Furthermore, most overnight visitors with or without dogs are most likely to happen outside the winter period. Subsequently, the effects of disturbance from dogs deriving from visitors of the attraction would not be significant. The increase in water-sport activities directly because of the development (and its visitors) is equally limited. While the impacts of diffuse recreational pressure will be limited, it is nonetheless a potential impact which could result in LSE on the integrity of the designated site.

5.6.15 EPN have been proactive in collaborating with other nature conservation stakeholders including Morecambe Bay Partnership, the RSPB and local educational institutions (delivering the Morecambe Bay Curriculum), and they will continue to engage throughout the project to deliver further outreach projects, specially to raise awareness and provide education on protected sites and their associated sensitivities. This will be achieved in the form of an Outreach and Education Plan (OEP), which shall be secured by legal agreement. The OEP is necessary to secure a positive outcome for the HRA.

5.6.16 Collision risk is not anticipated to be significant due to the embedded mitigation in the design and materiality of the buildings. However, taking a precautionary approach, regular bird collision monitoring will be undertaken in the first five years from the development becoming operational. If significant collision mortality occurs, remediation will need to be agreed with the LPA and Natural England. This too can be controlled by condition. With mitigation, there is no significant adverse effect on the integrity of the designated sites as a result of bird collision impacts.

5.6.17 The sHRA includes a robust in-combination assessments which does not identify any in-combination impacts. Overall, the LPA, as the competent authority, have adopted the applicant's sHRA and concur with its conclusions. Subject to the mitigation set out above being secured, there will be no significant adverse effect on the integrity of any European sites from the proposed development alone or in-combination with other projects or plans. On this basis, the proposed development equally conforms to the NPPF, SP8 of the SPLA DPD, DM44 of the DM DPD and DO2 of the MAAP. GMEU and Natural England have raised no objections to the development and concur with the conclusions of the HRA provided the mitigation identified is secured as part of any planning permission.

5.7 **Consideration 6 – Flood Risk and Drainage** (NPPF: Chapter 14 (Planning for Climate Change) paragraphs 152-154, 157, (Planning and Flood Risk) paragraphs 159–169, policy SP8 (Protecting the Natural Environment) and SP3 (Morecambe Main Seafront and Promenade) of the Strategic Policies and Land Allocations (SPLA) DPD; policies Development Management (DM) DPD policies DM33 (Development and Flood Risk), DM34 (Surface Water Run-off and Sustainable Drainage), DM35 (Water Supply and Waste Water) and DM36 (Protecting Water Resources and Infrastructure); Surface Water Drainage, Flood Risk Management and Watercourse Planning Advisory Note 3 (October 2020) and the North West England and North Wales Shoreline Management Plan (February 2011).

5.7.1 National and local planning policy requires development to be located in areas at least risk of flooding (subject to the developments flood risk vulnerability), to be safe from flooding and to not increase the

risk of flooding elsewhere taking account of climate change. For major development, sites should be drained in a sustainable manner using sustainable drainage systems (SuDS) and development should not impact upon existing water recourses and infrastructure and should maintain water quality.

- 5.7.2 The application site straddles floodzones 1, 2 and 3, although the majority of the site falls within floodzones 1 and 2. Floodzone 3 is limited largely to the northern edges of the site along the promenade and extends into the amenity greenspace to the north east of the Midland Hotel. The site has an average level of approximately 7.5m above Ordnance Datum (AOD). The minimum existing ground level is 4.5m AOD and a maximum level of 10.4m AOD on the northern side adjacent to the promenade. There is a culverted watercourse which flows from the south to the north beneath Marine Road Central and through the centre of the site. It is assumed the existing site drains into two soakaways with outfalls into the rock armour out into Morecambe Bay and at unrestricted rate. The EA maps indicate that the site does not benefit from formal flood defences, however, the shoreline management shows the site benefiting from the rock armour protection to the north. This protects the shoreline from coastal erosion and flooding. A secondary defence wall is set back from the primary defence structure and serves as a wave reflection wall.
- 5.7.3 The proposed development is classified a 'Less Vulnerable' (Table 3 of the Planning Practice Guidance (PPG) Flood Risk and Coastal Change) due to its leisure use. Based on the PPG Flood Risk and Vulnerability and Flood Zone Compatibility Table the proposed development would be classified as an appropriate land use across all floodzones affecting the site. This, together with the fact the site is allocated for leisure uses, means there is no requirement for sequential testing and the principle of development is acceptable.
- 5.7.4 Owing to the site's coastal location, the greatest risk of flooding is from coastal/tidal sources. Risk from surface water flooding is very low (less than a 0.1% probability of flooding) as is ground water flooding. Development proposals should consider the risk of flooding of the development itself and elsewhere for the lifetime of the development, accounting for climate change. In this case surface water drainage proposals shall be designed to cater for the 1% (1 in 100) Annual Exceedance Probability (AEP) event, including a 40% climate change allowance. This is an accepted position. Coastal and tidal flood risk is also expected to increase with an expected increase in seas levels and offshore windspeed with associated extreme wave heights.
- 5.7.5 The application and ES has been supported by a Flood Risk Assessment (FRA). Unfortunately, this was deemed insufficient by the Environment Agency (EA) and an objection was lodged against the application. Further Information has now been submitted in the form of technical appendices to the ES and the FRA showing the outcomes of hydraulic modelling to demonstrate the existing flood risk on site, the proposed mitigation measures to be incorporated into the development and how these impact flood risk on and off site. The conclusions drawn from this additional information have satisfied the EA, who have removed their objection subject to the imposition of conditions.
- 5.7.6 The applicant's model has been adapted and refined (to the site and immediate surrounds) and it updates the model that was initially developed for the EA's Lancashire Tidal Study (projected by JBA in 2014 and subsequently updated in 2020). When originally updated, the model did not account for updated wave modelling and overtopping assessments or changes in topography, which for the application is relevant due to the recent installation of the wave reflection wall. The applicant's updated model addresses the above deficiencies to provide a robust assessment and greater understanding of tidal risk rise at the site. The model accounts for static sea level rises in response to climate change. The model provides an understanding of flood risk for the existing baseline scenario, a post-development scenario and post-development with mitigation scenario.
- 5.7.7 The hydraulic modelling shows in the baseline scenario (0.5% (1 in 200yr) Annual Exceedance Probability (AEP) event in the future year (2124)) that water would propagate across the site and its surrounds and would inundate the buildings. The post-development scenario for the same event, which includes the raised embankment to the north coastal edge that serves as an informal flood defence and flood gates to the service entrances on the northern elevations, shows flooding of the site from the east and west, although flood extent and depths are reduced from the baseline model. This is a result of the proposed embankment running along the north of the development site providing a degree of protection to the wider area in terms of still water and wave overtopping. The preferred 'with-mitigation' model (for the same event), includes flood gates/barriers on all entrances of the shell pavilions and demonstrates the buildings would be protected from flooding and, like all other options modelled (there were three),

the maximum flood extent and depths would reduce off-site providing a small betterment in terms of tidal flood risk to wider areas of Morecambe to the south of the site.

- 5.7.8 The EA has had the applicant's hydraulic model reviewed by a third party. This confirmed that further calibration and sensitivity testing is needed in the modelling to increase the confidence levels in the model results and the appropriateness of the mitigation strategy. Nevertheless, the EA have removed their objection and confirmed from the evidence to date they are satisfied the development would be safe from flooding and not pose a flood risk elsewhere, subject to precise mitigation measures being agreed following an update and re-calibration of the hydraulic model. The EA recommend a condition requiring updates to the hydraulic modelling and a condition for a Flood Management Plan (as proposed), which will confirm the mitigation measures (namely the location and heights of flood barriers and maintenance of such identified following the re-modelling), and a flood alert and warning system, evacuation protocols, management of food water on site and any re-occupation of the site following a flood event.
- 5.7.9 In this regard, the application has adequately demonstrated with mitigation the potential effects of flood risk would not be significant and that the proposal conforms with the NPPF and policy DM33 of the DM DPD.
- 5.7.10 With regards to site drainage, the project will include a Sustainable Urban Drainage System (SuDS), which based on the submitted drainage strategy will include several key features:
- Blue roof systems to capture rainwater from roofs of the shell pavilions and this water to be recycled and reused in the development;
 - Surface water from the public realm to be conveyed where possible into the proposed indicative SuDS features (detention ponds, swales and rain gardens);
 - Surface water shall either discharge to soakaways (subject to further ground investigation) at a controlled rate, or; discharge to the existing culverted watercourse controlled to a greenfield rate (note this is betterment) with attenuation tanks provided within the site. The outfall will be to the sea.

The surface water drainage strategy requires further detailed ground investigation. While this level of detailed would generally be expected for full applications, officers and statutory consultees are satisfied the site will be capable of being drained in a sustainable way and that such is capable of being controlled by planning condition. The site area already provides ample scope to include attenuation and can be achieved within the layout of the proposed landscaping. Indicative suggestions are included in the drainage strategy with potential gravel attenuation provided in the "Shingle Plaza" and swale and detention ponds accommodated within the 'Energy Field'. The multifunctional benefits of above ground SuDS features is encouraged and clearly embedded in the EPN ethos. The drainage system will also incorporate pollution controls to maintain and enhance water quality.

- 5.7.11 Exceedance flows are largely out to sea or toward Marine Road Central (as existing). In the event of tidal surge, the submitted drainage strategy indicates the need for a pumping system to be activated at basement level, which would also deal with surface water exceeded events that reach the lower parts of the site.
- 5.7.12 The Lead Local Flood Authority (LLFA) has raised no objection to the proposal, subject to conditions requiring the development to be carried out with the submitted FRA and a surface water drainage scheme (based on the submitted drainage strategy) and maintenance plan to be submitted and agreed. In response to the *Further Information* consultation, the LLFA maintain their position but noted that the FRA addendum does not address concerns regarding exceedance events, specifically how, when closed, the flood barriers will interact with and re-direct surface water leaving the site. The LLFA require clarity if the proposed flood mitigation (proposed in response to the hydraulic modelling) will still require a pumping solution for surface water exceedance flows. The LLFA indicate that such issues must be addressed as part of the final surface water drainage condition.
- 5.7.13 Overall, the ES and supporting FRA (and its addendums) and the Drainage Strategy, demonstrate the risks from surface water flooding and contamination of the water environment (pollution control) are not significant in EIA terms, provided that final sustainable drainage proposals and their maintenance plans are secured by planning condition (to mitigate potential impacts). On this basis, the proposal is considered to compliant with the requirements of policies DM33, DM34 and DM26 of the DM DPD.

- 5.7.14 The foul drainage strategy has been developed in consultation with United Utilities confirming a connection to the public network at a restricted pass flow rate of 5l/s. The strategy will seek to connect to the system under Marine Road Central. The existing manhole has an invert level of 4m AOD, therefore flows from the development at ground level will be conveyed by gravity. At the lower ground level a pumped system will be required. The pumping station will be located in the proposed South Plant room. United Utilities had raised no objection to the proposals and recommend foul and surface water drainage conditions (aligning with the submitted drainage strategy).
- 5.7.15 The proposed development will inevitably increase demands on potable water supplies, though embedded mitigation will seek to minimise consumption (through rainwater harvesting for example). This will result in a slight significant effect but not such that would render the proposal unacceptable. United Utilities has not objected on the grounds of water supply considerations. Instead, they advise the applicant to engage with them at the earliest possible opportunity to ensure the water network can meet the demand and should reinforcements be required, this can be considered and addressed early. This is a matter that shall be addressed outside the planning arena.
- 5.7.16 Policy DM35 requires new development to drainage (foul water) in according with the drainage hierarchy, which requires connection to the public sewer in the first instance. This is proposed and capable of being achieved. In terms of water supply and consumption, this policy requires water efficiency measures to be incorporated and for non-residential development such measures should achieve BREEAM 'Excellent' standard. EPN are working to achieve this level and accept a planning condition to this affect. Consequently, policy DM35 shall be satisfied in full.
- 5.7.17 During the construction period there is the potential for increases in surface water and pollution entering the water environment. These impacts are capable of being mitigated through appropriate construction management practices, which can be controlled via the CEMP condition and drainage conditions. With mitigation, the potential effects are temporary, short-term and overall, not significant.
- 5.8 **Consideration 7 – Amenity and Pollution** (NPPF: Chapter 8 paragraph 92 and 97 (Promoting Healthy and Safe Communities), Chapter 12 (Achieving Well-Designed Places) paragraph, 130 and paragraphs 183 – 186 (Ground Conditions and Pollution); Development Management (DM) DPD policies DM2 (Housing standards), DM29 (Key Design Principles), DM30 (Sustainable Design), DM31 (Air Quality Management and Pollution), DM32 (Contaminated Land) and DM57 (Health and Well-Being).
- 5.8.1 The fundamental aims and objectives of the above policies is to ensure new development is well designed, safe and secure for its users and the wider public, protects the amenity of existing and future occupants and promotes health and well-being, by ensuring the effects of pollution arising from development or the interaction between uses is adequately mitigated.
- 5.8.2 **Noise Considerations**
The Noise and Vibration chapter of the ES is supported by a Noise Impact Assessment which assesses the effect of construction noise and vibration, in addition to operational noise and development generated road traffic noise, of the proposed development on nearby sensitive receptors. These include residential premises and hotel accommodation located primarily along Marine Road Central.
- 5.8.3 The proposed development is in a central position within a relatively dense urban location. There are many sensitive receptors that are likely to be affected by the introduction of a new, large visitor attraction. Given the proximity of the site to sensitive receptors, during construction temporary, short term minor adverse noise effects are predicted and moderate adverse effects from construction vibration impacts. The effects of noise from construction activity would result in a lowest observed adverse effect level (LOAEL). These impacts are capable of being mitigated through an appropriate Construction Environmental Management Plan (CEMP). The Council's Environmental Health Officer (EHO) is generally satisfied with the level of impact and proposed mitigation, subject to the CEMP stating no impact-driven piling to be used (unless supported by further assessment and mitigation) and further details relating to rolling operations (and if necessary further mitigation) due to the potential for 'moderate' adverse impacts from this construction technique. Contrary to the submitted proposals, the Council's EHO recommends a construction working hour condition limited to 08:00-18:00 with no weekend working or on bank holidays. No weekend working has been resisted by EPIL as this would simply prolong the building programme. The LPA have received no information during the consultation process from neighbouring businesses/operators or from Lancaster or Morecambe BID to suggest

weekend working would be prohibitive (to their business etc). As such, the LPA is of the opinion that working hours on a Saturday could be permissible between the hours of 08:00-16:00. Such are not deemed unreasonable given prevailing background noise levels and activity along the seafront at should times.

- 5.8.4 In terms of operational noise impacts, this will derive mainly from road traffic noise, servicing and deliveries, plant and the outdoor events. In terms of traffic noise associated (from visitors) the level of cars anticipated to be travelled along Marine Road Central arguable should be less than existing due to the loss of the Bay Arena car park and dispersal of visitor traffic before arriving at the venue. Most cars will be intercepted either at the P&R site or in town centre car parks to the south. As such the impacts are negligible and shall result in a no observed adverse effect level (NOEL).
- 5.8.5 Noise from delivery vehicles varies between ambient good deliveries and chill good deliveries (assuming vehicles will have refrigeration units and therefore noisier). There are no adverse effects during the daytime, but adverse effects are anticipated during the night for both ambient and chilled good vehicle. The level of effect ranges from negligible/minor (LOAEL) to moderate/major (SOAEL). The most adverse effects are from the chilled vehicles likely to be serving the cafes/restaurant. The applicant intends to mitigate this impact by prohibiting chilled deliveries between night-time periods (23:00-07:00) and for ambient deliveries between (midnight and 06:00). The Council's EHO has recommended limiting service deliveries to take place between 09:00–21:00. The recommended condition is considered overly onerous. However, the applicant's position equally results in LOAEL in some instances therefore a negotiated position must be reached. A verbal update will be provided in relation to this matter. Notwithstanding the delivery hours condition, a Service Delivery Management Plan is also the subject of condition and could refine this point further. It is an issue that can be satisfied by condition.
- 5.8.6 Noise deriving from plant is not precisely known at this stage as more detailed assessment is required as part of the next design stage. However, it is accepted that a condition controlling fixed plant noise limits to the daytime and night-time Rating Levels (47dB and 30dB respectively) at any noise sensitive receptor including hotels and dwellings, as set out in the ES (and in compliance with BS4142). This approach is accepted by the Council' EHO.
- 5.8.7 EPN proposes to host a maximum of 8 outdoor large music events at the attraction. These events would all take place primarily in the summer months (due to the impacts of the adjacent designated site) with music ceasing by 23:00. The layout of the arena, which will support a temporary stage above the permeant stone stage in the Rhythm Gardens, is purposefully designed to direct noise away from sensitive receptors along Marine Road Central (facing out toward the sea). The event space has a capacity of around 6,000.
- 5.8.8 The Code of Practice for Environmental Noise Control at Concerts 1995 (CoP) advises 1-3 concerts a year in urban locations between the hours of 09:00 and 23:00 not to exceed 75dBA over a 15 minute period. For 2-12 concerts the noise levels should not exceed the background noise level by more than 15dBA over a 15 minute period. For reasons set out in the submitted noise assessment, the applicant contends that there is scope to agree an alternative noise limit to those set out in the CoP depending on the number of events per year.
- 5.8.9 The baseline noise survey indicates an arithmetic background noise level of 46dB $L_{A90,1900-2300}$ at the monitoring located at the Winter Gardens assumed to be applicable to noise sensitive receptors along this stretch of Marine Road Central. The modelling indicates moderate impacts (LOAEL – SOAEL) at the closest locations to the south of the arena on Marine Road Central dropping to negligible (LOAEL) further away from the venue. The highest predicted noise level at the nearest non-residential sensitive receptor (Lakeland Rooms Hotel) is 73 dBA, approx. 150m southeast of the stage. The 61 dBA MNL level (equivalent to LOAEL) is not reached until at a distance of approximately 300m from the stage. Those property within 300m of the stage are anticipated to experience adverse noise impacts. The proposed mitigation includes:
- Temporary Acoustic Screening (c2.8m in height) along the southern boundary of the arena.
 - Specialist PA to accurately model and optimise the speakers to achieve more focused sounds with reduced side loading.
 - Noise Management Plan (for each a event and required in any case for licensing, which would include computer modelling of noise from the concert, noise limits to be agreed and set, event management for community engagement, noise monitoring)

- 5.8.10 Given the inherent variability in noise arising from music related events/amplification arrangements, and the indicative nature of predictive noise modelling around events, the Council's EHO has recommended the LPA adopt a precautionary approach to the number of events permitted and recommends this is set at a lower level (3 events) than that proposed (8 events). The Council's EHO recommended any planning condition provides arrangements for periodic review where impacts arising from completed events can be considered. EPN have resisted the suggested lower limit of events on the grounds that the outdoor arena/event space forms a critical component to the overall operation and viability of the scheme (and was included in the OBC) and that a restriction by condition should not be necessary given the requirement (by condition) for an Event Management Plan. This would suitably secure details of the number of events and any mitigation measures required to keep noise within acceptable limits on each event day. With the comfort of planning conditions requiring implementation of the various mitigation and management measures and adherence to noise levels this would adequately control noise impact and abatement. The applicant has indicated that if there was a breach of noise levels for a particular event, then further events could not take place until it was adequately resolved. With this safeguard in place, the proposals present a proportionate and appropriate response to the issues raised.
- 5.8.11 With the mitigation measures, the concert noise impacts are likely to be direct, temporary, local, adverse minor or moderate at worse. The effect is not significant. The adverse effects shall be considered in the overall planning balance. However, it is acknowledged that many of the sensitive receptors (hotels and guest houses) will be offering accommodation to those who are attending the events, thus reducing the overall impact. Furthermore, it is noted that Morecambe already hosts an annual music festival and other events, plus the fairground. These attractions generally operate well and without undue effects locally. The LPA does acknowledge, as identified by Morecambe BID, that there are residential properties close to the site which would be affected. This is considered and modelled in the noise assessment and ES. While the impacts overall are not considered significant in EIA terms, the mitigation (in the form of an Events Management Plan) will provide a set of mitigation measures to minimise these temporary impacts in the interest of these nearby residents.
- 5.8.12 Air Quality
The proposed site lies outside any Air Quality Management Area (AQMA). The closest AQMA is in Lancaster City Centre. The application and ES is supported by a detailed Air Quality Assessment which assesses the effects on air quality during construction and the operational phases of the project. Planning policy DM31 requires development to minimise the levels of air pollution generated to adequately protect new users, existing users from the effect of poor air quality. Critically, emissions should not significantly worsen any emissions of air pollutants in areas where pollution levels are close to objective/limit value levels.
- 5.8.13 Existing air quality around the site and nearby is considered to be good with no indication of exceedance or close to exceedance levels identified. The main source of air pollution deriving from the development will be from construction traffic, plant and activities and traffic emissions from vehicles trips on the local network and from the car parks.
- 5.8.14 During construction, potential adverse effects are anticipated. However, appropriate construction management protocols and mitigation to reduce pollution impacts will ensure the level of impact is not significant. This can be appropriately controlled by condition requiring the submission and approval of a CEMP.
- 5.8.15 For the operational phase, dispersion modelling has been undertaken in accordance with an agreed scope of works. This concludes that for the opening year the annual mean concentration levels for NO₂, PM₁₀ and PM₂₅ will not be exceeded in the 'with' and 'without' the development scenarios. While the development will result in slight increases in concentration levels, the increase is minor and would result in negligible impacts on air quality. The same occurs in the future year scenario (2039). No direct mitigation measures are therefore required to minimise development-generated road traffic emissions. The Council's EHO had raised queries over the transport strategy and the assumed Annual Average Daily Traffic (AADT) figures used in the assessment, noting that should the strategy change it would have impacts on the noise and air quality assessments. The transport strategy has not changed during the determination period of the application. Furthermore, the council's EHO indicates that even with quite marked transport changes (for example, to anticipate higher average traffic flows or lower flows as a consequence of an expansion of park and ride measures to reduce the number of car trips travelling to Morecambe), this would not have any significant consequence on the headline conclusions drawn

above. Overall, the proposal will not result in a negative impact on local air quality and therefore accords with Development Management DPD DM31 and paragraph 185 of the NPPF.

5.8.16 Ground Conditions

The site occupies an area of previously developed land with a diverse history ranging from a breakers yard associated with the railway line and more recently a range of leisure uses. The majority of the land was originally reclaimed from the sea. As such there is the potential for contamination. A Preliminary Risk Assessment has been undertaken to support the application providing a baseline of the expected ground conditions, potential sources of contamination, sensitive receptors and pollution pathways. The assessments submitted demonstrate that there will be no significant effects as a result of contamination during either construction or once the development is operational. The desk-based assessments undertaken to date indicate any risks will be capable of mitigation through remediation of the site once detailed ground investigations have been undertaken. A condition is recommended to require a full site investigation and remediation strategy. Contamination during construction can be suitably controlled and mitigated through a CEMP. The Council's EHO is satisfied with the approach to contamination.

5.8.17 The ES has equally had regard to the effects of the development on the stability of the flood defence structures (sea wall) around the site. A geotechnical/structural assessment of the sea wall and the site itself will be required to inform the development construction design and its associated embedded mitigation. The structural assessments will need to demonstrate no adverse effect on the integrity and functional of the sea wall to proceed. The requirement of a stability assessment of the sea wall and details of any retaining structures sitting along side the promenade/highways shall be a requirement of a planning condition.

5.8.18 Sunlight, daylight, overshadowing and wind effects

Given the scale of the development, the ES also considered the effects of the development on daylight, sunlight, overshadowing and wind (microclimate effects). This has been carried out using advanced computer software to assess the potential impacts of the development on both residential development and commercial/hospitality, such as the Midland Hotel, in accordance with best practice guidance.

5.8.19 Simulations showed that all the neighbouring habitable rooms and public amenities will continue to receive adequate levels of daylight, sunlight, and solar access. No negative effects were found. The LPA do not have access to the modelling software or the expertise to validate the findings. However, the assessment appears robust and as such there is no reason to dispute the outcomes of the assessment. The LPA have not received any objections to the proposal on these grounds from any surrounding businesses or residential properties.

5.8.20 The applicant's consultants have also undertaken a ground level wind microclimate assessment. Again, this is carried out using advanced computer modelling. The current site is largely open and exposed to the seafront, despite shelter being provided by the depression and embankment to the northern end of the site. The proposed development will introduce 4 substantial buildings, connecting structures and extensive landscaping, altering the potential aerodynamics of the site and its surrounding environment. The effects have been assessed using UK industry standards. This is known (in part) as the Lawson criteria, which defines a comfort criteria (acceptable windiness) for different activities (walking, sitting etc). This is all embedded in delivery high-quality design and place-making.

5.8.21 The assessment concludes that off-site the wind conditions (pedestrian comfort) will not deteriorate and therefore all off-site effects are negligible. Simulations show that, following the proposed development, off-site regions of distress for frail pedestrians and cyclists are significantly reduced resulting in a minor beneficial impact. On-site generally evidences an improvement, with slightly milder conditions than existing, except within some of the most exposed areas of the site and within the landscaped areas (plus the raised decked terrace). In these locations moderate adverse impacts have been identified. The increase in wind and thus discomfort to those sitting/walking/cycling through these areas can be mitigated with appropriately high boundary treatments, landscaping and shelters. Such features are already incorporated into the design. Overall, with mitigation the effects are considerable negligible although the LPA do not have access to the modelling software or the expertise to validate the findings. However, the assessment is robust and as such there is no reason to dispute the outcomes of the assessment.

5.8.22 Security

The proposed development and its embedded mitigation will be delivered to achieve Secured by Design (SBD) security standards. This aligns with policy DM29 of the DM DPD and paragraph 97 of the NPPF. The NPPF states planning decisions '*should promote public safety and take into account wider security and defence requirements*'. For proposals where large numbers of people are expected to congregate, development should be informed by most up-to-date evidence from the police and other agencies and should include appropriate and proportionate steps to be taken to reduced vulnerability, increase resilience and ensure public safety and security and is compromised. EPN have engaged with Lancashire Constabulary and their placemaking resilience advisors at the pre-application stage. This has informed many embedded mitigation measures as part of the design proposals. For example, the building configuration and public realm areas provide highly legible spaces and routes around the buildings with access areas are clearly defined. Landscaping proposals includes embedded security and resilience features, together with a combination of fixed and retractable bollards (for access). There will be a detailed lighting scheme, together with CCTV linked back to a central security control room, developed as part of the project.

- 5.8.21 The design-related security measures are considered acceptable overall with lighting and CCTV matters capable of being secured by condition. Lancashire Constabulary have raised no objections to the proposed and invite further engagement on a confidential basis (for obvious reason). Overall, the proposal is considered to conform to policy DM29 of the DM DPD and the NPPF.

5.9 **Consideration 8 – Climate Change** (NPPF: paragraph 7-8 (Achieving sustainable development) and paragraph 154 of the NPPF, Policies DM29 (Key design principles), DM30 (Sustainable design), DM31 (Air Quality management and pollution), DM35 (Water supply and waste water), DM53 (Renewable and low carbon energy generation) of the DM DPD and draft emerging policies of the Climate Emergency Local Plan Review including DM29 (Key design principles), DM30 (Sustainable design), DM30b (Sustainable Design and Construction – Water Efficiency), DM30c (Sustainable Design and Construction – Water Materials, Waste and Construction))

- 5.9.1 The review of the recently adopted Local Plan is an immediate response to the Council's Climate emergency, which was declared in 2019. Current planning policy seeks to encourage (DM30) development to deliver high standards of sustainable design and construction. Emerging policy removes the term encourage and sets are a number of key requirements which would positively contribute to tackling climate change. The emerging Climate Emergency Local Plan Review carries limited weight at this stage but remains a material consideration.

- 5.9.2 Notwithstanding the current policy position, EPN are proposing to delivery a net-zero building in the opening year with regenerative sustainability at the heart of the project. Its overall energy and sustainability strategy aligns with the emerging policy expectations. EPN is intended to be a leader in this area, not only aiming to keep its environmental impacts to an absolute minimum, but to deliver environmental benefits. EPN have devised a regenerative sustainable framework based on five principal capitals (Natural capital, Human Capital, Social Capital, Manufactured Capital and Financial Capital) which ensures a comprehensive and holistic approach to the project design. This extends beyond the sustainability of the new buildings and includes the outreach and educational ambitions of EPN in connecting people with the environment, the importance of protecting the planet and the value this has on health and wellbeing. The ethos and ambitions set out in the application align closely with the Council's ambitions to tackle climate change

- 5.9.3 For EPN to meet the Net-Zero target the buildings must satisfy the requirements:

- Reduce construction impacts (minimise embodied carbon emissions from construction materials as much as possible and complete a whole life carbon assessment).
- Reduction operational energy use.
- Increase renewable energy supply.
- Offset any remaining carbon.

This ambition has been a driver for the design of the development. EPN have applied a '*Lean, Clean, Green*' hierarchical approach to energy for the project. A similar approach with taken to water. Both aiming to minimise demands and consumption from the outset. The submitted Energy Statement provides an extensive assessment of the approach adopted and the embedded mitigation in the design of the development to meet their ambitions. The information provided also demonstrates how the development will achieve a BREEAM 'excellent' rating.

5.9.4 A summary of the key targets/measures proposed are as follows (much of these fall within the scope of Natural Capital forming part of the regenerative sustainable framework):

- Achieve BREEAM 'Excellent'. The initial pre-assessment demonstrates this is achievable.
- No fossil fuels on site and run solely on electric from renewable sources.
- Heat source pumps are proposed – the intention is to use open loop ground source heat pumps, but this is subject to further investigation. EPN have subsequently designed the proposal to have flexibility to use either air or ground source heat pumps. The Energy Pods have been designed to suitably accommodate necessary infrastructure, as well as education the public and visitors of the sustainability qualities of the project.
- Net-zero building on opening day.
- Targeting an annual energy consumption of 2.32 GWh/yr (below their benchmark model based on Eden Cornwall)
- All energy from 100% renewable sources. The scheme involves the provision of photovoltaic cells as part of the building cladding system to the southern elevations. The precise detail will be provided late, however this is only likely to generate around 7% of the electricity demands needed. The remaining demand will be via high quality 100% renewable electricity tariffs in the first instance. EPN have aspirations to explore other arrangements such as power purchase agreement with local generation projects, but these may not be realised for the opening year. Passive wiring/infrastructure should be designed into the development.
- Waste and Recycling Plans will be implemented across the project and will be confirmed in the Operational Waste Management Strategy. This is a key target to be met as part of the BREEAM accreditation.
- Sustainable drainage scheme with rainwater harvesting incorporated into the design of the development.
- Cycle provision and changing facilities on site for staff and visitors.
- Transport Strategy and Parking Plans – aimed at promoting and incentivising sustainable travel.
- In the longer term, EPN will continue to strive to deliver the 2019 Transport Vision as part of wider collaboration and projects outside the scope of this planning application, but also as part of the targets, review and monitoring of the Travel plan.
- Designed to cope with the effects of climate change over the lifetime of the project (e.g. flood risk mitigation and drainage design, construction and materiality of the shells allows for them to operate passively without the need for active energy systems).
- Biodiversity Net Gain.

5.9.5 The sustainability of the project extends much further than this, with the social and economic aspects of the project equally integral and vitally important to the objective of reinventing Morecambe for the 21st century. EPIL's ambitions to collaborate are already evident within the wider district community, and there is no reason to doubt that this level of engagement will continue through the construction phases and beyond. EPN will be at the heart of the town and a new focal point for the community. While there is a paid boundary for the wider visitor attraction, the scheme provides significantly improved landscaping and open space for the wider community to enjoy (approximately 50% of the site). All existing community assets, such as the promenade, cycle route and the War Memorial remain in place and will be enhanced by the proposals. The project has been designed for all users with accessibility build into the external and internal components of the development. The development is designed to be highly inclusive and accessible, including the experiences envisaged as part of the attraction.

5.9.6 The effort and analysis undertaken to demonstrate how sustainable the project would be is in our experience, unprecedented locally and it reflects the motivation and ambition of the project to deliver a flagship development which not only supports EPIL's objectives as an environmental, educational charity but aligns with the council's ambitions to meet its climate change objectives too. In planning terms, the scheme is considered to fully conform and exceed policy requirements in relation to sustainable design and climate change mitigation. Planning conditions are recommended. This includes a requirement to meet BREEAM excellent and a detailed scheme of the final proposals (air or heat pump, extent, and details of PV provision within the development scheme).

5.10 **Consideration 9 – Socio-economic and health considerations** (NPPF: paragraph 7-8 (Achieving sustainable development) and paragraph 154 of the NPPF, Policies SP4 (Priorities for Sustainable Economic Growth) of the SPLA DPD, EC5 (Regeneration Priority Areas), TC4 (Central Morecambe), SC5 Recreation Opportunity Areas); policies DM22 (Leisure Facilities and Attractions), DM26 (Public Realm and Civic Space, DM28 (Employment and Skills Plan), DM29 (Key design principles), DM57 (health and Well-being)

5.10.1 The ES includes a chapter on socio-economic impacts of the proposed development. This is an extensive assessment and considers the effects on population and demographics, economic activity, education and skills, health and deprivation. The project as set out at the beginning of this report is not simply the creation of a visitor attraction, it is far more inclusive and transformational. EPN seeks to reinvent Morecambe as a seaside resort for the 21st century. The focus is therefore on the integration, opportunity, collaboration, and engagement the project with its communities.

5.10.2 The proposed development will create employment during construction. Once the attraction is open to the public, it will operate with established local supply chains and will also create a significant enhancement to the local visitor economy. Additional footfall within the town should support local businesses and will equally raise investor confidence locally to attract further inward investment. The off-site highway improvements required as part of the project support linkages to the town centre, as well as the parking strategy, which assumes visitors will require a parking space for the whole day providing opportunity for visitors to spend time before or after their visit to EPN to dwell around the rest of the town.

5.10.3 The ES sets out several baseline assumptions in relation to population and employment. Of note, the ES indicates that in Lancaster (2019 data) there was 66,000 jobs. The job density figure produced showed Lancaster below that of the Northwest and the average for Great Britain. A similar correlation is made in relation to earnings (gross weekly pay). In terms of economic activity at a more refined level, the ES shows within the Poulton Ward (in 2011) 10.4% of people were unemployment, which was higher than the district average (6.7%) and England and Wales average of 7.6%. Within the Poulton ward, the portion of the population claiming out-of-work benefits in Poulton was 11%, significantly higher than the rate for the district (5.4%) and Great Britain (6.1%). Of those working in Poulton ward, the greatest proportion of people were working in lower skilled occupations (above the figures for the district and England and Wales), which correlates with a higher percentage of people in Poulton ward without qualifications (compared to Lancaster and England and Wales). Ward level health data also shows higher levels of limiting long-term illness or disability, higher mortality and higher child obesity in the Poulton ward compared to Lancaster and nationally. This baseline information sets a scene as to the level of deprivation (not in all areas) that is apparent in Morecambe. The English Indices of Deprivation (EID, 2019) places the site within 3% of the most deprived neighbourhoods in England.

5.10.4 EPN therefore offers significant opportunity to revive Morecambe, support its economic prosperity and drive social inclusivity. There are several key socio-economic benefits that are anticipated by EPN. These include:

- Estimated net additional construction employment would generate gross value added (GVA) to the regional economy of around £47.3 million.
- Training and apprenticeship schemes available working in partnership with Lancaster and Morecambe College. This will be reinforced through the planning permission with a requirement for an Employment Skills Plan.
- Once operational EPN is estimated to create 280 full time equivalent (FTE) jobs at the local level, 166 FTE additional jobs at regional level and 28 FTE jobs at head office in Cornwall (directly linking to EPN) (equates to 389 FTE jobs on-site).
- It is estimated that the jobs supported by EPN and the supply chains could contribute approximate GVA to the North West economy of up to £21 million annually in perpetuity.
- Business rates of £116,000.
- the applicant indicates that the total annual overall spend in England by visitors to Eden Project North is estimated to be £233 million, based on approximately one million visitors annually.
- Research and collaboration with the University.

The key health and well-being benefits include:

- EPN aims to support local employment providing significant opportunities in an area of high unemployment.
- Training and Education links – (this links to the ESP and wider educational objectives delivered through the Morecambe Bay Curriculum, local school trips).
- Provision of high quality public realm and open space, with biodiversity net-gains.
- Opportunities for temporary food, beverage and mechanised stalls to help create opportunities for local businesses.
- Exemplar example of a net zero development.
- Collaboration with the health services to promote the health and well-being benefits of the nature environment.
- Volunteering opportunities.

The effects identified above will have beneficial impacts (the significance of which ranges from major to minor beneficial impacts across the varying effects). Officers concur with these conclusions, recognising these positive effects are significant benefits of the proposal to be weighed in favour in the overall planning balance. No adverse impacts were identified in the assessment. In conclusion, the proposals fully accord with the aims and objectives of the policies listed above.

- 5.10.5 It is accepted that the redevelopment of the site will affect the way other operators and users have previously occupied the site. For example, the travelling circus and the fun fair will no longer be able to operate from the site. While this may disappoint some people, the loss of these temporary uses to make way for a comprehensive regeneration of the site in accordance with the MAAP's land allocation ambitions would not affect this planning decision.
- 5.10.6 Some public representations have commented on what would happen to the Festival Market site. The Market site is located outside of the boundary of this planning application, and it is unaffected by the proposals and its parking strategy.

6.0 Conclusion and Planning Balance

- 6.1 Coastal communities throughout the United Kingdom have faced a unique set of challenges during the latter part of the 20th Century, exacerbated by the downturn of the domestic tourism market leading to significant economic decline. There have however been recent signals that Morecambe is well-positioned to take advantage of the opportunities for sustainable regeneration.
- 6.2 As this report discusses, the Central Promenade site is one that has a rich and vibrant history. In later years the site has been under-used despite its geographical prominence within the town. Much like the vacant Frontierland site (which has recently been purchased by the City Council to facilitate the town's regeneration ambitions), Central Promenade comprises a critical element of the town's future offer.
- 6.3 The current planning application aims to remedy the under-utilisation of the site and it will deliver an exciting and highly-innovative tourism and leisure destination that will be attractive to both locals and visitors alike.
- 6.4 The environmentally-responsible nature of the attraction is underpinned by EPIL's global mission to create a movement that builds relationships between people and the natural world. This aligns neatly with the Council's declared Climate Emergency and the pioneering work being undertaken by the local planning authority via its Climate Emergency Local Plan Review.
- 6.5 Most observers consider that EPN will provide a catalyst for transformation of the town; the district; and the wider economic region. Whilst EPN will be different to the existing Eden Project in Cornwall in terms of its content and built form, it is nonetheless tempting to note the impact that the Cornwall site has had on the local economy. It is a significant local employer that operates a variety of education and social projects and has attracted over 18 million visitors since it first opened over twenty years ago. It is estimated that it has contributed £1.7 billion to the local economy during that time.
- 6.6 The Morecambe site is centrally located, and consequently there is genuine optimism that the positive impacts arising from the development will quickly become firmly embedded within the town. The

benefits arising from this weather-proofed attraction will be experienced by local hoteliers, retailers, food and drink providers and other businesses within Morecambe and the wider north-west region.

6.7 The development itself represents a new landmark building within the town, with its bold architecture and dynamic landscaping and an embedded appreciation for the natural environment. Its BREEAM 'Excellent' and net-zero ambitions are fully supported, and through EPN's own charitable objectives and values, the development will showcase the benefits of successful regenerative sustainability. The development fully aligns with the strategic spatial vision set out in the SPLA DPD and the MAAP (D02).

6.8 The scheme will deliver substantial benefits including:

- Employment and training opportunities (construction and operation);
- Investment - significant GVA contributions as well as the potential to provide a catalyst for other investments (construction and operation);
- Re-use and regeneration of a large brownfield site in the centre of Morecambe;
- Heritage benefits (expect the Midland Hotel);
- Bio-diversity net gain on site far exceeding 10%;
- Minor flood risk improvements to parts of Morecambe to the south;
- Leading sustainable design – flagship project aiming for net-zero and BREEAM 'Excellent';
- Improved public open space and public realm;
- Highway improvement scheme along Marine Road Central to prioritise pedestrians and to enhance connections to the town centre;
- Education - training, upskilling and research in collaboration with the University and the implementation of the Morecambe Bay Curriculum for local primary schools;
- Raising awareness of nature conservation and Morecambe Bay (the whole project ethos).

Outside of the planning arena, EPN continue to work with many local organisations, community groups, partners and charities to foster new exciting relationships and projects that build on and support the vision and objectives of EPN.

6.9 At a technical level, the ES and its supporting information, together with the further information submitted to address the transport, flood risk and nature conservation considerations, demonstrates that the environmental effects arising from the development are not significant (in EIA terms). With extensive mitigation in the form of a detailed parking strategy (to be secured by legal agreement), off-site highway improvements works and travel planning (amongst other matters to be conditions), the traffic and parking demands arising from the development are considered acceptable and compliant with the Development Plan. EPN remain committed to their 2019 Transport Vision and therefore, through effective travel planning and collaboration, the impacts of vehicle trips and parking should improve in future years. The effects on the adjacent designated nature conservation sites have been adequately addressed with mitigation necessary to ascertain the development would not lead to likely significant effects and the integrity of the sites would not be harmed. In terms of flood risk, the nature of the use is compatible with the sites flood risk classification. Identified mitigation is required to inform a suitable Flood Risk Mitigation and Management Plan to safeguard the development from flood risk and from flood elsewhere (following updated modelling). Sufficient evidence has demonstrated that this is achievable (subject to condition) to accord with the NPPF and Development Plan in respect of flood risk. Finally, the effects of the proposal on cultural heritage have been assessed in full and there are beneficial impacts arising from the development on the Conservation Area and the setting of all listed buildings, except the Midland Hotel. The level of harm arising from the development and the impacts it has on the significance of the setting of this Grade II* listed building is considered to be less than substantial. Paragraph 202 of the NPPF applies which requires the less than substantial harm to be weighed against the public benefits of the proposal. In this case the public benefits are substantial, including the identified heritage benefits, and such would outweigh the less than substantial harm identified to the Midland Hotel. Potential noise arising from outdoor events (largely affecting a small area along Marine Road Central where there are residential receptors (dwellings and hotel/guest houses)) may lead to some adverse effects. These events are limited to a maximum of 8 events in any year. The applicant also proposes an Events Management Plan to be imposed by condition to prescribe appropriate community engagement, noise limits, mitigation, monitoring and review protocols. Whilst departing from the Council's EHO' recommendation, this approach, on balance, in view of the benefits in favour of the proposal, is considered acceptable. All other technical and environmental considerations have been addressed, raising no significant environmental issues subject to mitigation where identified.

- 6.10 This report concludes a two and a half year pre-development and planning application process. During that period there have been wide-reaching consultation and engagement events that have revealed overwhelming local support for the project. The local planning authority's recommendation that planning permission should be granted takes this support into account, but it is also founded upon a robust technical assessment of the development. EPN has the potential to be a key component of the Northern Powerhouse and it represents a once-in-a-generation opportunity to establish an outstanding visitor attraction that is also a responsible local employer, a creative social charity and an advocate for global environmental sustainability. Subject to the recommended planning obligation and conditions, it will be a very welcome addition to Morecambe.
- 6.11 For the reasons set out above, and on balance, the proposed development would constitute sustainable development with far-reaching environmental, social and economic benefits and therefore fully accords with the development plan and the NPPF. On this basis, Members are recommended to support the application.

Recommendation

That Planning Permission Consent BE GRANTED subject to the a **legal agreement** requiring the submission and approval of:-

1. Submission, approval and implement of **Full Travel Plan**.
2. **Travel Plan Contribution** to the sum of £10,000.
3. A **Visitor Access and Parking Strategy** comprising the following heads of terms:
 - Details and confirmation of contractual agreements for the locations of car parks and quantum of car parking spaces, including accessible parking, allocated to Eden Project North visitors and staff. This detail should evidence parking demand by EPN would not compromise capacity and demand for the P&R site itself;
 - Details of necessary infrastructure (physical works and/or technology) required at the designated car parks to accommodate Eden Project North visitors and staff, such as ticketing facilities/barriers with implementation before first use/operation of the development;
 - A strategy setting out how access and usage of the designated car parks for both Eden Project North visitors/staff and members of the public will be managed on a day-to-day basis including enforcement;
 - Details of the advanced dynamic ticketing system and pricing regime, including car park charging/integrated ticketing (where relevant) and entrance requirements into the attraction (for example, evidence of bus/rail or parking ticket);
 - No access without an advanced ticket during peak times (as defined in the TA);
 - Details of maximum duration of stay for parking (this should aligned with the assumptions in the TA);
 - Mechanisms to manage vehicle demands when capacity is exceeded (for example events);
 - Details of the shuttle bus service and frequency (no less than 15 mins);
 - A coach parking and facilities strategy, including drop up and pick up points;
 - Confirmation of the maximum number of visitor tickets sold limited to 750 per hour;
 - A strategy for monitoring modal choice of staff and visitors (to be based on the Travel Plan and its monitoring outcomes);
 - A process to regularly monitor and review and if necessarily update the approved Visitor Access and Parking Strategy.
4. An **Outreach and Education Plan** comprise the following heads of terms:
 - A scheme detailing the delivery of no less than 12 external engagement sessions per annum (for the lifetime of the development) promoting the importance of the Bay and how to avoid recreational disturbance;
 - Details of the number and content of interpretation boards within the attraction itself – to be retained at all times;

- Details of the content within promotional material (based on the importance of the Bay and how to avoid recreational disturbance) for external distribution (hotel stays etc) and on the website (time of booking for example) to be available/distributed before operation;
- Details and progress of other partnership engagement projects;
- Monitoring (idea of timescales would be good), reporting and review of the above and impact assessment/effectiveness of actions in OEP/research, to be carried out every three years;
- Milestone reflection;
- Flexibility to review OEP linked to monitoring.

and, the following **conditions**:

Condition no.	Description	Type
1	Time Limit	Control
2	Approved Plans	Control
3	Phasing Strategy (construction)	Pre-com
4	Employment Skills Plan	Pre-com
5	Construction Environment Management Plan (CEMP)	Pre-com
6	Traffic Management Plan (TMP) for construction	
7	Site Investigation (Remediation Strategy)	Pre-com
8	Surface Water Drainage Scheme	Pre-com
9	Demolition and Construction Phase Surface Water Management Plan	Pre-com
10	Foul Drainage Scheme	Pre-com
11	Flood Risk Mitigation Scheme	Pre-com
12	Geotechnical / structural assessment of the sea wall and details of any retaining structures adjacent to the highway.	Pre-com
13	Flood Management Plan	Pre-com (of building)
14	Precise scheme for on-site renewable technology and energy efficient measures.	Pre-com (of building)
15	Details and samples (where relevant) of all external materials, including the construction pattern and cladding of the shell pavilions, window/door details and curtain glazing features and flood gates (pursuant to condition 11).	Pre-com (of building)
16	Details of retaining wall and vegetated embankment with seating to northern façade	Pre-com (of building)
17	Details and samples precise details of the Energy Pods and Canopy structure, street furniture and boundary features and enclosures	Before the construction of the structures set out in the condition.
18	Lighting scheme	Pre-com (of building)
19	Security scheme to be agreed with details of CCTV and development to meet Secure by Design standards	Pre-installation of security measures
20	Access and off-site highway scheme to be submitted and agreed including: <ul style="list-style-type: none"> • Marine Road Central Improvement Scheme • Cycle provision improvements connection Marine Road Central to Greenway • M6 junction calibration • Shrimp roundabout improvements • Signage Strategy 	Pre-com (of building)
21	Detailed scheme for cycle provision (sheltered and secure)	Before the provision of the cycle parking is provided
22	Landscaping/public realm scheme to be implemented with planting schedule submitted for approval	Prior to first use and before implementation of landscaping.
23	Landscape and habitat (BNG) Maintenance and Management Plan	Before first use/operation

24	Collision Monitoring programme (sHRA mitigation)	Before first use/operation
25	Additional bat surveys if the existing buildings are not demolished by April 2023 identifying any change and necessary mitigation.	Control
26	Operation, Maintenance and Verification Report of constructed Sustainable Drainage System.	Before first use/operation
27	Delivery, Collections and Service Strategy	Before first use/operation
28	Service access and turning facilities to be provided and retained at all times	Before first use/operation
29	Protocol to define and then restrict size and nature of large scale outdoor events to a maximum of 8 within the summer period only in accordance with the HRA.	Before first use/operation
30	Events Management Plan providing require noise assessment and reciprocal noise management practices to mitigate impacts to include flexibility to review for specific events.	Before any event takes place
31	Noise Limit for plant to accord with BS4142 Rating Levels	Control
32	Construction hours limited to 08:00-18:00 Mon-Fri, 08:00-16:00 on Sat and no working Sundays and bank holidays unless otherwise agreed in writing with the LPA (for exceptional reasons).	Control
33	Goods/servicing delivery times restrictions (TBC)	Control
34	BREEAM 'Excellent' standard	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