

Centros Miller Planning Applications for the development of the canal corridor

Objection by Councillors

Objection submitted on 15th June 2007

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Statement of Purpose

This is an objection to the following planning applications and it is our intention that the objections apply with equal force to each and every application on the grounds that they are all inextricably interlinked and mutually reinforcing and are all intended to deliver the “Castle View” project. The applications are:

- [07/00672/OUT](#) - Comprehensive redevelopment comprising a retail led mixed used scheme to include demolition of existing buildings and associated structures, the demolition of all residential dwellings other than 5 Edward Street, the change of use of a residential dwelling at 5 Edward Street to offices, the closure and alteration of highways, engineering works and construction of new buildings and structures to provide, retail, restaurants, cafes, workshop, leisure, crèche, rehearsal space and residential accommodation, together with ancillary and associated development including pedestrian bridge link, new and enhanced pedestrian routes and open spaces, car parking and vehicular access and servicing facilities at the Canal Corridor North Site, Lancaster.
- [07/00589/OUT](#) - Outline application for the redevelopment of the site to provide residential accommodation (between 55-68 self contained units) and ancillary car parking and landscaping at Part Of Heron Chemical Works Site, Moor Lane, Lancaster.
- [07/00602/OUT](#) - Outline application for the redevelopment of the site to provide a building for retail at ground floor level with offices above and associated car parking at Land East Of Golden Lion, Moor Lane, Lancaster.
- [07/00662/LB](#) - Application for Listed Building Consent for the alteration of St Leonard's Gate by the removal of the adjacent redundant spiritualist church and making good and reinstatement of the western flank wall of number 18 St Leonard's Gate.
- [07/00665/LB](#) - Listed Building Application for alterations and reinstatement of northern elevation (following demolition of part of the adjacent Heron Chemical Works) at Mill Hall, Moor Lane, Lancaster.
- [07/00667/LB](#) - Listed Building application for alterations and reinstatement of north-eastern flank wall (following demolition of adjacent 1 Lodge Street) at The Grand Theatre, St Leonard's Gate, Lancaster.
- [07/00668/LB](#) - Listed Building application for alterations and reinstatement of curtilage wall (following demolition of adjacent buildings) at Mill Hall, Moor Lane, Lancaster
- [07/00669/LB](#) - Listed Building application for demolition of buildings to rear and alterations and reinstatement of rear flank wall - 11 Moor Lane, Lancaster
- [07/00674/LB](#) - Listed Building application for demolition of rear extensions and outbuildings and alterations / reinstatement of the rear elevation at 127, 129 & 131 St Leonard's Gate, Lancaster.
- [07/00663/CON](#) - Conservation Area consent to demolish part of Heron Chemical Works building and ancillary structures.

- [07/00666/CON](#) - Conservation Area consent to demolish structures adjacent to Mill Hall Gatehouse and curtilage wall at Heron Chemical Works, Moor Lane, Lancaster.
- [07/00670/CON](#) - Application for Conservation Area Consent to demolish 1 Lodge Street (Musician's co-op & dance studio) and associated structures.
- [07/00671/CON](#) - Application for Conservation Area Consent to demolish 1 - 2 St Annes Place and associated structures – 1-2 St Anne's Place, Lancaster.
- [07/00673/CON](#) - Application for Conservation Area Consent to demolish 133 - 139 St Leonard's Gate, 1 - 5 Stonewell, 3 - 7 Moor Lane and all ancillary structures.

A note on the drip-feed of planning objections and timing

We note that these applications have been drip-fed into the planning system and that this has caused confusion over deadlines. In our view they should have been submitted en-bloc on one day with a very clear statement that comments and objections are invited up until a closing date of at least 28 days after the submission date.

We have now accepted that the deadline for objections is 28 days from the 18th May and further that objections will be accepted until the end of June. This was clarified in an e-mail from Mark Cassidy dated 21st May 2007:

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I cannot formally extend the deadline so this should not appear on the fliers - the site notices went up on Thursday evening and were dated from Friday (May 18th) and so technically the date for consultation replies is 28 days from then. All I am saying is that I will not rule out any objections submitted throughout June.

Summary

We recommend that this application be rejected on the following grounds:

- 1 It is contrary to planning policy at national level and to the Lancaster Local Plan**
- 2 It will generate significant amounts of extra traffic on an already congested highway system and the proposed highway measures do not deliver a fundamental solution and will add to the volume of rat-running and environmentally damaging traffic impacts on Derwent Rd and Ullswater Rd**
- 3 The job creation claims are not credible and do not take into account job loss amongst existing retail and service sectors of the local economy**
- 4 The development will damage retailing in Lancaster City centre, Morecambe and Carnforth**

1 It is contrary to planning policy at national level and to the Lancaster Local Plan

The proposals before planning committee are in direct conflict with and contrary to national planning policy in

PPS1 Delivering Sustainable Development
PPS6 Town Centres
PPG13 Transport

PPS1 Delivering Sustainable Development

PPS1 gives high-level protection to the historic environment and the applications involve the destruction of a very fine number of buildings that form part of Lancaster's heritage. PPS1 is clear:

5. Planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by:
 - making suitable land available for development in line with economic, social and environmental objectives to improve people's quality of life;
 - contributing to sustainable economic development;
 - protecting and enhancing the natural and historic environment, the quality and character of the countryside, and existing communities;

and

Protection and Enhancement of the Environment

17. The Government is committed to protecting and enhancing the quality of the natural and historic environment, in both rural and urban areas. Planning policies should seek to protect and enhance the quality, character and amenity value of the countryside and urban areas as a whole. A high level of protection should be given to most valued townscapes and landscapes, wildlife habitats and natural resources. Those with national and international designations should receive the highest level of protection.

The demolition of Stonewell does not “protect or enhance the historic environment. It is an unacceptable act of vandalism.

PPS1 requires that climate change be taken into account through the reduction of energy of energy use, emission and “the need to travel by private car”:

13. The following key principles should be applied to ensure that development plans and decisions taken on planning applications contribute to the delivery of sustainable development:
 - (i) Development plans should ensure that sustainable development is pursued in an integrated manner, in line with the principles for sustainable development set out in the UK strategy. Regional planning bodies and local planning authorities should ensure that development plans promote outcomes in which environmental, economic and social objectives are achieved together over time.
 - (ii) Regional planning bodies and local planning authorities should ensure that development plans contribute to global sustainability by addressing the causes and potential impacts of climate change⁴ – through policies which reduce energy use, reduce emissions (for example, by encouraging patterns of development which reduce the need to travel by private car, or reduce the impact of moving freight), promote the development of renewable energy resources, and take climate change impacts into account in the location and design of development.

The proposals before planning committee are in clear contradiction to these principles. At the heart of the development is a 800 space multi-story car park which is 500 more than the current total on this site. This massive increase in car parking identifies this proposal as intensively car dependent and designed to encourage car-based access to shopping.

It is simply not credible to describe an increase of car parking provision of 500 spaces as anything other than a development that will increase car use, increase the consumption of fossil fuel and increase greenhouse gas emissions to the detriment of national climate change policy.

PPS1 (para 27) is clearer still:

- (vi) Focus developments that attract a large number of people, especially retail, leisure and office development, in existing centres to promote their vitality and viability, social inclusion and more sustainable patterns of development.
- (vii) Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges.

In our view the whole canal corridor is most clearly not the “existing centre”. It is a new and an alternative centre and will have a dramatic effect on travel patterns and consumer spending patterns. It is contrary to PPS1 to develop a new centre.

Building an 800 space car park cannot in any way be regarded as “reducing the need to travel”.

PPS1 lays down a clear requirement to involve the community in shaping a vision of the future of their area. This has been blatantly disregarded in the consultation process to date. Lancaster City Council has failed to take its responsibilities seriously in this regard and has not consulted and the developer has pushed through a large shopping centre proposal when the community was clear that it wanted youth facilities, green space and genuinely affordable housing together with jobs.

PPS1 says in para 13:

- (vi) Community involvement is an essential element in delivering sustainable development and creating sustainable and safe communities. In developing the vision for their areas, planning authorities should ensure that communities are able to contribute to ideas about how that vision can be achieved, have the opportunity to participate in the process of drawing up the vision, strategy and specific plan policies, and to be involved in development proposals. (See also paragraphs 40 – 44 below).

and

Community Involvement

40. Planning shapes the places where people work and live. The planning system operates in the public interest to ensure the development and use of land results in better places for people to live, the delivery of development where communities need it, as well as the protection and enhancement of the natural and historic environment and the countryside. The outcomes from planning affect everyone, and everyone must therefore have the opportunity to play a role in delivering effective and inclusive planning. Community involvement is vitally important to planning and the achievement of sustainable development.

and

41. One of the principles of sustainable development is to involve the community in developing the vision for its area. Communities should be asked to offer ideas about what that vision should be, and how it can be achieved. Where there are external constraints that may impact on the vision and future development of the area (for example, those that may arise from planning policies set at the regional or national level) these should be made clear from the outset. Local communities should be given the opportunity to participate fully in the process for drawing up specific plans or policies and to be consulted on proposals for development. Local authorities, through their community strategies and local development documents, and town and parish councils, through parish plans, should play a key role in developing full and active community involvement in their areas.
42. Planning authorities should build a clear understanding of the make-up, interests and needs of the communities in their areas. Communities will be made up of many different interest groups, for example, relating to a particular place, issues (such as access for the disabled, local environmental quality, or support for small businesses), values or religion. Some of these will be well established and represented. But some groups may be less well equipped to engage with the planning system. An inclusive approach should be taken to ensure that different groups have the opportunity to participate and are not disadvantaged in the process. Identifying and understanding the needs of groups who find it difficult to engage with the planning system is critical to achieving sustainable development objectives.

In this case the planning authority has not involved the community. The community has not been given the opportunity to become involved in a genuinely participatory process of creating a vision.

It is especially regrettable that the planning authority and the developer have made no effort to contact young people, families with small children or the elderly in articulating their views and ideas about the future of this area. Bulk Ward is a highly distinctive and special community with significant numbers of elderly, long-term sick, youth and small children and the narrow “vision” presented to this community by Centros Miller does not take these groups into account. This rejection of wider community interests and social needs has produced a skewed and inappropriate vision of the future of this part of Bulk ward.

The break with national planning policy could not be greater with respect to involving the community. PPS1 again:

43. Community involvement in planning should not be a reactive, tick-box, process. It should enable the local community to say what sort of place they want to live in at a stage when this can make a difference. Effective community involvement requires an approach which:

- enables communities to put forward ideas and suggestions and participate in developing proposals and options. It is not sufficient to invite them to simply comment once these have been worked-up;

The local community have not been given the opportunity in any meaningful way to say “what sort of place they want to live in”.

PPS1 Supplement on Climate Change (Consultation version, December 2006)

In the consultation version of the PPS1 supplement government has given a clear indication that it expects climate change issues to figure much more centrally in planning matters including planning applications:

Planning Policy Statements (PPS) set out the Government's national policies on different aspects of spatial planning in England. PPS1 sets out the overarching planning policies on the delivery of sustainable development through the planning system.

This PPS on climate change supplements PPS1 by setting out how planning should contribute to reducing emissions and stabilising climate change (mitigation) and take into account the unavoidable consequences (adaptation). It does not seek to assemble all national planning policy relevant or applicable to climate change and should be read alongside the national PPS/G series. Where there is any difference in emphasis on climate change between the policies in this PPS and others in the national series this is intentional and this PPS takes precedence.

These policies on planning and climate change should be taken into account by regional planning bodies in the preparation of regional spatial strategies, by the Mayor of London in relation to the spatial development strategy in London and by local planning authorities in the preparation of local development documents. They may also be material to decisions on individual planning applications.

Source:

Consultation

Planning Policy Statement: Planning and Climate Change Supplement to Planning Policy Statement 1

Page 10

http://www.communities.gov.uk/pub/142/ConsultationPlanningPolicyStatementPlanningandClimateChangeSupplementtoPlanning1_id1505142.pdf

The proposals before the planning committee do not set out to reduce emission of greenhouse gases. They will increase them.

This is contrary to the government's climate change policy agenda and contrary to Lancaster City Council's climate change policy.

PPS6 Town Centres

Government planning policy is designed to protect existing centres:

- 2.1 In order to deliver the Government's objective of promoting vital and viable town centres, development should be focused in existing centres in order to strengthen and, where appropriate, regenerate them. Regional planning bodies and local planning authorities should:

It is our view that the applications before planning committee are about creating a new centre. The location has never been part of the city centre either functionally or historically or in the minds and perceptions of Lancaster's citizens. It is separate and distinct from the existing centre. It is moreover organised around an 800 space car park which effectively turns its back on the existing city centre and identifies itself with a flow of car-borne shoppers from the north, encouraged by the new road giving direct access to the new car park.

This is not a development of the existing city centre and it strains credibility and the English language to regard it as such.

It is contrary to government planning policy on town centres.

PPS6 identifies the sequential approach to site selection for any identified need for the expansion of retailing:

c) Apply the Sequential Approach to Site Selection

2.44 A sequential approach should be applied in selecting appropriate sites for allocation within the centres where identified need is to be met. All options in the centre (including, where necessary, the extension of the centre) should be thoroughly assessed before less central sites are considered for development for main town centre uses. The sequential approach requires that locations are considered in the following order:

- first, locations in appropriate existing centres where suitable sites or buildings for conversion are, or are likely to become, available within the development plan document period, taking account of an appropriate scale of development in relation to the role and function of the centre; and then
- edge-of-centre locations, with preference given to sites that are or will be well-connected to the centre; and then
- out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre.

In considering alternative sites with similar locational characteristics in terms of the sequential approach, and having regard to the strategic objectives for the network and hierarchy of town centres set out in their development plan documents, local planning authorities should give weight to those locations that best serve the needs of deprived areas. The distance thresholds used in applying the sequential approach and for searching for appropriate sites will differ for different types of development (see Table 2, Annex A).

We are not convinced that the sequential approach has been followed in the case of this application. First of all the whole application has been driven by a development concept based on the view of Debenhams of what is a commercially viable retail development. This is not necessarily the same (and in our view is not the same) as a dispassionate and independent assessment of other options. The Debenhams-centric approach pursued by the applicant produces a very large development which by definition cannot be accommodated in the existing centre. This is the fault of an over-large development and not of any intrinsic characteristics of the existing centre.

Thus the application is an example of the tail wagging the dog. A smaller retail development would be capable of delivering a result at the first level of priority in the sequential test i.e. in the existing centre.

Even if this first level fails it is still not accepted that the second level (edge of centre location) test is met. The canal corridor area is not well connected to the existing centre. There is a very large and a very environmentally unfriendly one way road severing the town centre from the canal corridor area. There is also a change in level. Irrespective of whether or not the Stonewell Bridge survives the criticisms made of it by English heritage the bridge does not transform the canal corridor area into a condition that could be described as “well-connected”

The canal corridor development is not well connected and fails the second stage of the sequential test.

The canal corridor does not fall within the PPS6 definition of edge of centre:

Edge-of-centre

For retail purposes, a location that is well connected to and within easy walking distance (ie. up to 300 metres) of the primary shopping area.

For all other main town centre uses, this is likely to be within 300 metres of a town centre boundary¹⁷.

In determining whether a site falls within the definition of edge-of-centre, account should be taken of local circumstances. For example, local topography will affect pedestrians' perceptions of easy walking distance from the centre. Other considerations include barriers, such as crossing major roads and car parks, the attractiveness and perceived safety of the route and the strength of attraction and size of the town centre. A site will not be well connected to a centre where it is physically separated from it by a barrier such as a major road, railway line or river and there is no existing or proposed pedestrian route which provides safe and convenient access to the centre.

Much of the canal corridor site is beyond the 300 metre threshold. The additional factors of topography and barriers (even with the bridge if it survives the planning process) means that this site cannot be regarded as edge of centre.

There is a clear presumption in PPS6 against sites that do not fit into either town centre or edge of centre categories.

This proposal does not fit into either category and should be rejected as an inappropriate development of a completely new shopping centre located beyond “easy walking distance” of the existing centre.

The proposal before planning committee is for an out of centre development and this should be rejected:

Out-of-centre

A location which is not in or on the edge of a centre but not necessarily outside the urban area.

PPG13 Transport

PPG13 is very clear about its objectives and they include (para 4):

2. promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling, and
3. reduce the need to travel, especially by car.

and in para 6

7. use parking policies, alongside other planning and transport measures, to promote sustainable transport choices and reduce reliance on the car for work and other journeys;

A large new shopping centre that is beyond easy walking distance and centres on a 800 space multi-story car park and a new access road is a clear example of a development that is designed to increase car based trips. It is contrary to PPG13.

A proposal to provide an additional 500 car parking spaces is as blatant a departure from the clear policy injunction of PPG13 as it is possible to imagine.

PPG13 also recommends that out of centre locations should be avoided for retailing:

35. Policies for retail and leisure should seek to promote the vitality and viability of existing town centres, which should be the preferred locations for new retail and leisure developments. At the regional and strategic level, local authorities should establish a hierarchy of town centres, taking account of accessibility by public transport, to identify preferred locations for major retail and leisure investment. At the local level, preference should be given to town centre sites, followed by edge of centre and, only then, out of centre sites in locations which are (or will be) well served by public transport. Where there is a clearly established need for such development and it cannot be accommodated in or on the edge of existing centres, it may be appropriate to combine the proposal with existing out of centre developments, provided that improvements to public transport can be negotiated. This is a summary of guidance in PPG 6.

PPG13 also raises matters around parking and parking charges that are very relevant to this proposal:

Parking Controls and Charges

57. As part of an overall approach on parking, covering both the local transport plan and development plan, local authorities should adopt on-street measures to complement land use policies. Car parking charges should also be used to encourage the use of alternative modes. The RTS should set out the context for parking controls and charges by each local authority. Within this context, local authorities should set out appropriate levels and charges for parking which do not undermine the vitality of other town centres. Controls over public parking (both on-street parking and in car parks) need to be backed up by adequate enforcement measures.

58. Authorities should generally refuse planning permission for car parks which do not accord with this guidance or the policies set out in the development plan or local transport plan and where appropriate should encourage redevelopment or re-use of existing parking.

To the best of our knowledge no information is available on parking charges and the car park is any case a private car park

outside of local authority control. This means that a major segment of our car parking provision will now be provided according to the commercial needs of Debenhams and will be outside LA and LTP influence. This is likely to frustrate our ambitions for managing traffic growth in and around the city centre.

Also in our view this situation falls within the remit of para 58 in PPG13. This clearly spells out that planning permission should be refused for the car park

PPG13 is clear that travel plans must be submitted with a planning application:

89. The Government considers that travel plans should be submitted alongside planning applications which are likely to have significant transport implications, including those for:

1. all major developments comprising jobs, shopping, leisure and services (using the same thresholds as set out in annex D);

A travel plan should produce (PPG13, para 88):

1. reductions in car usage (particularly single occupancy journeys) and increased use of

public transport, walking and cycling;

2. reduced traffic speeds and improved road safety and personal security particularly for pedestrians and cyclists; and

3. more environmentally friendly delivery and freight movements, including home delivery services.

We have seen nothing in the documentation associated with the planning application that will deliver reductions in car usage. Indeed it would be perverse to argue that this was the case in a situation where there is a net addition of 500 spaces.

Similarly there is no attempt to deal with “more environmentally friendly delivery” or with “home delivery services”.

The travel plan component of the planning application is woefully inadequate and fails to meet any reasonable standard of commitment to funding, timescales, targets, monitoring and objectives. It can be found in para 12.03 of the Environmental Statement and it fails to meet PPG13 requirements for a travel plan.

The very vague description of travel plan matters contrasts with the very clear instruction in PPG13 to give these plans some “bite”:

90. Where travel plans are to be submitted alongside a planning application, they should be worked up in consultation with the local authority and local transport providers. They should have measurable outputs, which might relate to targets in the local transport plan, and should set out the arrangements for monitoring the progress of the plan, as well as the arrangements for enforcement, in the event that agreed objectives are not met. They might be designed for the applicant only, or be part of a wider initiative, possibly organised by the local authority, involving other developments in the area²⁸.

On the basis of the failure to follow PPG13 guidance the planning applications should be rejected.

Regional Planning Policies

The proposal before planning committee clearly contravenes regional planning and regional level strategies:

The clearest expression of this is in the North West Regional Spatial Strategy (RSS) EIP Panel Report, which explicitly states that proposals, schemes, and investment decisions should contribute to the regional target of reducing carbon emissions (Recommendation 3.10). The recommendations in this Report represent the most recent expression of policy intent in the Region, based on the most up-to-date scientific evidence and most recent consultation and testing, and should therefore be given particular weight with regard to topics such as climate change, where the evidence base and policy is developing so rapidly.

The North West has also adopted a Climate Change Action Plan, “Rising to the Challenge”, led by the North West Development Agency. The headline target for this Plan is to reduce the quantity of GHGs emitted in the Region. The exact amount of the reduction is due to be quantified during Summer 2007, however, this proposal will directly undermine that target by increasing the quantity of emissions in the region. It undermines the intention of this key regional document and will cancel out some of the positive impact that other measures within the Plan will have.

Local Planning Policies

The proposal before planning committee contravenes several Local plan Policies.

- It will add thousands of extra cars each day on to our main roads and lead to an increase in traffic on Derwent Rd., Ullswater Rd. and Moor Lane. This contravenes **LDLP (Lancaster District Local Plan) Policy T17 which states, “Where the developer is unwilling to meet reasonable targets for minimising the proportion of journeys made to this site by car, development will not be permitted.”**
- The 800 space multi-storey car park contravenes **LDLP (Lancaster District Local Plan) Policy T13 which states, “Proposals for additional shopper/ visitor car parking will only be allowed where this is accompanied by an equivalent reduction in the all day commuter parking.”**
- Centros Miller is now seeking permission for a shopping centre even bigger than Fishergate in Preston. It will undermine Lancaster Market and retailing in Morecambe. It will double the comparison (that means non-food types of goods) shopping space that we already have in the existing Lancaster city centre and so undermine its vitality and viability. Centros Miller has utterly failed to justify this increase in the Retail Assessment published with the planning applications. **This contravenes government Planning Policy Statement no.6. (PPS 6.) It also contravenes LDLP (Lancaster District Local Plan) Policy S2.**

See http://www.cartoplus.co.uk/lancaster/text/03econ.htm#3_5

- The proposed retail development extends far beyond that envisaged in the Canal Corridor Development Plan Brief (the Mitchells Brewery site) to the canal-side. Referring to land between Alfred St./Edward St. and the canal, **Paragraph 7.8 of the Development Plan Brief states that, “This area is relatively remote from the City Centre and the Primary Bus Corridor and has residential emphasis. The Council would not wish to encourage retail, commercial, leisure, food and drink uses and other uses likely to attract a lot of people.”**
- It involves the demolition of the buildings at Stonewell (including Stonewell post office) and the bottom end of Moor Lane all inside the City Conservation Area. Centros Miller has produced only an outline planning application for the replacement of this area, not a detailed architectural submission. This contravenes **LDLP Policy E37 which states, “Proposals to demolish any building within a conservation area will only be approved where detailed planning permission has been given for a scheme of redevelopment which would preserve and enhance the conservation area ...”**
- The height of many blocks in the scheme is out-of-scale with the surrounding area (and much higher than we could have expected) which will be detrimental to the townscape. This contravenes **LDLP Policy E35 which states, “Development proposals which would adversely affect important views into and across a conservation area or lead to an unacceptable erosion of its historic form and layout, open spaces and townscape setting will not be permitted.”**
- The views from the canal-side between Shaw St. and Moor Lane will be lost and the canal-side itself ‘developed’. This contravenes existing policy to preserve green corridors, of which the Lancaster Canal is one. **LDLP paragraph 5.6.8 states that, “The City Council will pay particular regard to development proposals close to**

the green corridors and will seek to resist applications which would affect their role in providing quiet enjoyment or as a haven for wildlife.”

The Canal Corridor North Development Plan Brief states that public consultation is an essential element of the development of plans for the regeneration of the Canal Corridor North – see:

- Section 2.4** “the regeneration of the area must be carried out in close consultation with local people and address their needs and aspirations”;
- Section 2.7** “extensive public involvement in the development of the proposals”;
- Section 4.14** “The Council intends to progress the development of the area in such a way which maximises the involvement of local people and which reflects local concerns as much as possible. This could mean involving local residents in the nature and detailed design of the proposed improvements and hopefully engendering a sense of ownership in the outcome”;
- Section 4.14** also states that, “The council will continue to consult widely as the proposals are developed and involve many different bodies in the process.”
- The LCC Consultation strategy (March 2006)** “recognises and welcomes the fundamental importance of consulting effectively with local people” to ensure that “there is increased public participation in the decision making process.”

Lancaster City Council’s Climate Change Policies

The 324 page Environmental Statement submitted with these planning applications omits any reference to the most important topic currently debated in sustainable development and in national and international environmental policy. The applications are blind to climate change which stands in stark contrast to national, international and local policy

Lancaster City Council has made strong commitments to dealing with climate change:

‘In adopting the Corporate Plan it be noted that the Cabinet's priorities for 2006/07 include action on climate change as High Priority No.2.11 and in respect of this the Chief Executive be authorised to sign up to the North West Climate Change Charter on behalf of the City Council.’

Source: Full Council, 8th February 2006

The City Council has now signed the North West Climate Change Charter:

North West Climate Change Charter Commitments

By signing the Charter, Lancaster City Council:

Acknowledges:

That climate change will profoundly influence the environmental, social and economic conditions in the Northwest of England and will continue to be a critical factor throughout the 21st Century. You have a responsibility to lessen the destructive effects of this phenomenon, in the interests of your own organisation and the region.

Commits To:

- Taking action to mitigate and adapt to climate change
- Acknowledging that action needs to take place at all levels – global, international, European, national, regional and locally
- Helping the region to achieve the national goal of reducing CO₂ by 60% by 2050 (based on 1990 levels)
- Supporting better ways to co-ordinate action on climate change across the region

Agrees to take on the climate change challenge by:

- Putting climate change at the heart of your internal decision-making process
- Taking all practical steps to limit CO₂ emissions and responding to the challenges posed by the impacts of climate change
- Setting up organisation-wide and effective CO₂ measurement and monitoring arrangements and comparing your results with appropriate benchmarks
- Working with others to communicate your progress and successes and
- encourage others to take action to ensure that England's Northwest becomes a champion for climate change activity

The Northwest Climate Change Charter is coordinated by Sustainability Northwest. For more information call 0161 247 7800

Source:



Climate Change Liaison Group Progress Report

16th January 2006

Report of Corporate Director (Finance and Performance)

A commitment to put climate change at the heart of our internal decision making procedures and a commitment to limit CO₂ emissions and help the region achieve a 60% reduction by 2050 is not compatible with support for the canal corridor development.

It is simply not possible to achieve progress with climate change in the way that Council policy directs us whilst at the same time approving and supporting developments that are carbon rich and that will drive up our district-wide emissions.

This incompatibility strikes at the heart of climate change policy and at the heart of our credibility and if every local authority in the UK adopts the same approach the UK will quite simply not achieve its CO₂ reduction targets

These planning applications should be rejected on the grounds that it undermines local and national commitments to combat climate change problems.

2 It will generate significant amounts of extra traffic on an already congested highway system and will add to the volume of rat-running and environmentally damaging traffic impacts on Derwent Rd and Ullswater Rd

In this section we outline 11 sets of reasons why the plans submitted by Centros Miller should be rejected on the grounds of their impacts of traffic.

1. A Car-Based Development.

The Centros Miller proposals are explicit in that the development is conceived to attract shoppers to the site who will be car based. In the Design & Access Statement, section 2.3: *Key Routes into the City* refers onto to the highway infrastructure. It makes no mention at all of rail or bus access.

The design **locks-in car dependency** as evidenced by:

1. Increasing the amount of short-stay parking by 71% from c.469 to 800 (Transport Assessment paras 7.7, 7.20)
2. Increasing the capacity of the junction with Back Caton Road

There are numerous internal references that are in conflict with these design features, e.g.:

“6.16 As outlined above, the Site is located in an accessible city centre location, thereby reducing the need to travel by car” (Transport Assessment).

If so, why increase parking and road capacity?

More importantly, the CM proposals **fundamentally misinterpret the meaning and purpose of PPG13 (Transport), PPS 3 (Sustainability) and PPS6 (Planning for Town Centres)**. They have identified that the site is a prime development opportunity due to its accessibility by sustainable transport, but then pervert this quality by designing a proposal that largely ignores it and is highly car-focussed.

Examples from these include:

PPG13

“The objectives of this guidance are to integrate planning and transport at the national, regional, strategic and local level to:

- *promote more sustainable transport choices for both people and for moving freight*
- *reduce the need to travel, especially by car”*

“In preparing their development plans and in determining planning applications, local authorities should... influence the design, location and access arrangements of development, including restrictions on parking, to ensure it promotes cycling” (Para 79)

PPS6

“to deliver more sustainable patterns of development, ensuring that locations are fully exploited through high-density, mixed-use development and promoting sustainable transport choices, including reducing the need to travel and providing alternatives to car use” (Para 1.5)

PPS3

“Is easily accessible and well-connected to public transport and community facilities and services, and is well laid out so that all the space is used efficiently, is safe, accessible and user-friendly” (Para 16)

The Transport Assessment refers to the value of **linked trips**. Great value is attributed to this, especially in relation to PPS6:

6.31 The proposals will facilitate increases in linked trips reducing the level of additional traffic likely to be attracted to the development site. (CM Transport Assessment)

No details are provided to substantiate this justification – either of how many linked trips this may involve (as a proportion of all trips) or how this might compare to what happens at present. What is the evidence from other developments that this occurs?

Without evidence-based detail on these aspects of linked trips, the committee should disregard any other stated benefits with regard to them

A significant omission from any of the transport assessments is an assessment of the **impacts on regional traffic and transport**. The Transport Assessment (paras 8.20, 8.21) suggest a 5% growth in new “attraction” to the city from the regional hinterland (Figure 8.2). There is no evaluation of:

- What are the origins of newly attracted traffic to the site?
- Is the net effect of these journeys an increase or decrease in overall car miles and associated emissions?

Until these issues are explicitly qualified, the Committee should reject the applications. The

Transport Assessment almost exclusively assumes that the site will be **accessed from the north only**. Indeed, Para 7.19 states that the car parks to the south of the site would be altered from short-stay to long-stay car parks. Para 7.20 describes the proposed 800

place “northern interceptor car park” with an unsubstantiated (but worrying in terms of

The Committee needs to determine

- **Why is there no mention of the impacts of the development on the highway network to the south of the site?**
- **Whether this implies that visitors from the south will be encouraged to use M6 J34? If so, what would be the added net mileages of this?**

encouraging car use) “...possible long term provision of an interceptor car park to the south of Lancaster City Centre”.

2. Induced traffic

1. The Transport Assessment acknowledges the significant increase in traffic generated by the development (para 8.23; Table 8.8). It also - rightly – highlights

8.27 Indeed, the JLSP acknowledges the congested nature of the highway network around Lancaster and sets a target to reduce traffic flows, as outlined below:

8.28 *Traffic within town centres can have a significant impact on environmental quality and economic attractiveness. Morning and evening commuter flows have a particular impact. Target 7.2 seeks to reduce average daily traffic flows into and out of the core of Principal Urban Areas and Main Towns by 5% by 2016 compared with 2001 levels.*

These are openly contradictory – the predicted increase in traffic contravenes the JLSP targets to reduce traffic flows.

2. The plans propose various modifications to the existing road layout to mitigate the traffic impacts of the development. The main component is the remodeling of the junction to the north of the site to increase its capacity:

“4.36 Option 2 was identified as the preferred highways option of the Council, with the improvements being considered deliverable and sufficient to provide a significant benefit to the congestion around Bulk Road, and could help the flow of traffic onto the ring-road system.”

The latter point illustrates well the problem of this local re-arrangement of layout. While it may help to solve a local problem, it is explicitly displacing the congestion pressure onto other parts of the local highway network – in effect shunting the bottlenecks to new locations. There is no assessment of where the new bottlenecks will appear nor whether or how they can be dealt with.

3. Traffic resulting from retail developments is closely related to retail floor area. The Transport Assessment (para 4.15) states:

With regard to the retail uses, the County was strongly of the view that TRICS should not be used to assess the traffic attraction for the retail floorspace. This is because of the lack of appropriate and comparable traffic count data held in the database for large, comprehensive city centre and mixed-use retail schemes.

This contradicts the use of TRICS outlined elsewhere in the Traffic Assessment (8.22) and is obtuse as the TRICS database is the national standard in making such assessments. The 2005 TRICS report “Trip attraction rates of developments with multiple retail and leisure uses” summarises the evidence on traffic impacts from 41 developments comparable to this proposal. Based on the stated internal floor areas for the retail element of the development of 39,972 m², **the national TRICS database predicts an extra 11,400 vehicle movements per day**, not including the non-retail elements (hence an **underestimation**).

The committee needs to obtain:

1. **an independent estimate of induced traffic levels based on standard, nationally accepted methodologies**
2. **independent advice on the impacts of induced traffic levels on the highways network**

The committee has to consider how the predicted increases in traffic flows:

1. **can be accommodated on an already congested traffic network**
2. **tallies with stated policy to *reduce* traffic**

3. Parking

The nature and quantity of parking can have significant effects on travel behaviour and hence the modal split and quantity of traffic generated. PPG 13 states that:

parking policies [should be used] alongside other planning and transport measures, to promote sustainable transport choices and reduce reliance on the car for work and other journeys

Local authorities "should revise their parking standards to allow for significantly lower levels of off-street parking provision, particularly for developments in locations, such as town centres, where services are readily accessible by walking, cycling or public transport

The availability of car parking has a major influence on the means of transport people choose for their journeys. Some studies suggest that levels of parking can be more significant than levels of public transport provision in determining means of travel (particularly for the journey to work) even for locations very well served by public transport. Car parking also takes up a large amount of space in development, is costly to business and reduces densities. Reducing the amount of parking in new development (and in the expansion and change of use in existing development) is essential, as part of a package of planning and transport measures, to promote sustainable travel choices.

In developing and implementing policies on parking, local authorities should ... ensure that, as part of a package of planning and transport measures, levels of parking provided in association with development will promote sustainable transport choices;

There is no informed evidence in the submissions made by Centros Miller about how parking levels have been determined in relation to these issues.

It is therefore the responsibility of the planning committee to obtain evidence that assesses the impact of different levels of parking provision on the encouragement of sustainable transport options for this site. This evidence should be interpreted in the context of the Local Authorities' policies and stated targets for uptake of sustainable transport.

4. Rat-running

The current problem of rat-running through Freehold and Alfred/Edward Street is clearly identified in the Transport Assessment, the cause being avoidance of the congested gyratories. The stated solution is to implement solutions to shift the rat-running traffic onto the main gyratories (para 1.6).

The Alfred/Edward St problem will be solved by the severing of Edward St to through traffic. This can only increase the pressure on the Freehold rat runs. The suggested solutions involve:

- i. adjustments to the local routing of Morecambe-bound traffic near to the Skerton & Greyhound bridges (paras 4.24 & 4.41)
- ii. the impact of the new feeder road to the site from Caton road (4.41).
- iii. a new signalised junction at Bulk Road/Caton Road.

(i) and (ii) will have a trivial impact on the gyratory peak traffic volumes. We do not consider that this will have any significant impact on the drivers of rat-running.

The main issue is the existence of the extra several thousand vehicle movements per day that the proposed development will generate, plus the re-routed Alfred/Edward St rat-runners. These are at least an order of magnitude greater than the impacts of solutions i, ii and iii.

The Transport Assessment does not identify the current serious rat-running problem through the Newton Estate. This is a serious shortcoming. The focus of the traffic impacts to the north of the site can only make this problem worse

Para 4.43 states:

It is therefore necessary to find a balance between the detrimental effect of rat-running traffic on residents, the accessibility requirements of the residents and the operation of the highway network.

If the planning committee agree to this proposal, they are implicitly stating that the quality of life of hundreds of residents can be sacrificed and indeed made worse in order to proceed with the development.

Rat running through Freehold, Ridge and Newton is totally unacceptable at current levels and there can be no doubt that these levels will increase if this development goes ahead. The quality of life of thousands of Bulk Ward residents is at stake here and it is essential to make absolutely sure that these residents are given protection from this unwarranted detriment.

5. Travel plan

Travel plans design bespoke solutions to travel impacts of developments, providing ways of encouraging effective shifts to sustainable transport modes from car dependency. They have become routine conditions of developments of this scale.

While the Environmental Statement states:

13.72 A Travel Plan has been prepared, which is designed to minimise the impact of Development-related private car journeys on local air quality. This has been submitted as part of the Transport Assessment, by Mayer Brown.

it does not exist. The Department for Transport provide guidance on travel planning and TRICS have developed standard approaches for monitoring and ensuring compliance.

In order to provide the framework that will manage effectively travel to and from the site, **it is essential that a travel plan is submitted before any planning agreements are granted** which contains

- strategies that cover retail, leisure, workplace and residential elements of the development
- appropriate modal targets,
- a strategy to step up targets over time
- an effective monitoring strategy
- a compulsory and binding implementation strategy.

Travel plans that are not monitored to binding targets do not work.

6. Traffic modelling

The results of traffic modelling are only as good as

- (i) the quality and appropriateness of the input data (“garbage-in-garbage-out”). Although limited in quantity (no winter/summer differences, school term/holiday differences, wet day / dry day etc; see (v) below), the quality of the input data for the models used is appropriate.
- (ii) the appropriateness of the specific model (its assumptions, algorithms etc) to the highway layout being modelled (*generally* OK here)
- (iii) the model’s calibrations to the specific site (serious problems)
- (iv) an assessment of the range of errors of the model’s output (+/- 5%? 50%?)
- (v) the sensitivity of the model’s output to the detail of the data and information being input.

There are two elements of traffic modelling covered in the Transport Assessments:

Transyt modelling concerned exploring scheduling of signalling to optimise traffic flows through the gyratories. The resulting report exposes the model’s widespread **underestimation of current traffic flows** at the model calibration stage as evidenced in the *TRANSYT Base Model Development: Modelling and Evaluation of Report*. The tables in Section 5 show that “Model (PCU)” values are often lower (sometimes considerably lower) than “Survey (PCU)”. There is also **considerable inconsistency** in the degree of differences between the modelled and actual values.

This means that:

1. Any subsequent use of the TRANSYT model to predict future traffic (of an altered highway layout) will **underestimate traffic flows**
2. The large inconsistencies between real and modelled traffic flows mean that there would be **wide margins of error** in any predictive use of the model.
3. The extent of the **margins of error are not quantified**

The outputs of the TRANSYT modelling was used to inform the PARAMICS modelling. This means that these weaknesses are being transferred to the PARAMICS results, although there is no assessment of the impact of these TRANSYT weaknesses on the PARAMICS results.

PARAMICS modelling allows micro-simulations of traffic flows as a result of changes to highway layout. It is regarded as robust *as far as it goes*. A comprehensive comparative review of traffic models undertaken by the Institute of

Transport Studies at the University of Leeds. It outlined that the **PARAMICS model does not include:**

- Public transport use, walking, cycling & motorbikes
- Modal split, accidents, speed, interaction with pedestrians, roadside pollution, stress

Tests on the robustness of PARAMICS modelling in New Zealand have illustrated some of its shortcomings:

“It was noted above that the two longest closures were not successfully modelled in Paramics. The main reason was the occurrence of “routeing errors” during the simulation.it is likely that drivers would use more of the surrounding street network to avoid congestion.” (Berdica & Anjic)

The modelling results are involved, convoluted and opaque.

The planning committee must demand:

1. **A clear summary of before-and-after traffic flows for key parts of the highway network (including rat-running through residential neighbourhoods)**
2. **A formal assessment of the confidence / error bars associated with the predicted figures**
3. **A formal assessment of the sensitivity of the predicted figures to the details of the assumptions made.**

Until the committee has a *clear picture* of these issues, they are not in a position to make a decision on the proposed development.

7. Comparison of traffic impacts with those at similar developments

Predicting traffic flows and behaviour is prone to many assumptions and potential errors. An essential complementary approach to assessing impacts is to look at similar developments elsewhere.

This is not done at all in any of the documentation relating to the proposal.

Before-and-after studies of the traffic impacts of developments almost always show that the real “after” traffic flows are greater – often considerably – than those predicted beforehand. Examples of this for similar are the Oasis development (Reading), Fremlin Walk Development (Maidstone) and Festival Place (Basingstoke). The paucity of good quality before-after appraisals has been identified as a general problem with regard to developments. To address this (with regard to road building schemes), the CPRE & Countryside Agency’s 2006 *Beyond Transport Infrastructure: Lessons for the future from recent road projects* looked in detail at several recent road schemes and revealed that *Traffic growth on the routes considered was higher than forecast, sometimes quite dramatically so.*

The Committee should demand an assessment of *actual* “after” local traffic levels with those predicted for similar developments.

8. Public Transport, walking and cycling

The Transport Assessment and other CM documents rightly state the extensive benefits of the site for development with respect to its potential for the use of sustainable transport modes.

However, the committee needs to consider the following:

1. No assessment is made of origins of walking, cycling or trips by public transport. How does the proposed development *encourage* (rather than merely accommodate) trips by sustainable modes?
2. What assessment has been made of the capacity of visits to the site by sustainable modes, and to what extent has this informed a reduction in accommodation for car visits?
3. There are no assessments or targets of modal split of visitors to the site. This is essential and these should be stated clearly with a strategic assessment of the policies and design strategies to achieve these targets. See previous comments on the travel plan.
4. These targets need to be in line with – and driven by - PPG 13, PPS 3 & 6 and other relevant policies
5. Lancaster is a national Cycle Demonstration Town. The proposed provision of cycle routes around the sites and peripheral cycle parking demonstrates only how *not* to encourage trips by cycle.
6. The recent Mayer-Brown study on the problems of cycle permeability of Lancaster City centre highlighted the need to *increase* (not decrease) the ease of passage by cycle of the city centre. These proposals decrease cycle permeability.
7. The proposed links to the main public transport hubs (bus and rail stations) are woefully inadequate.
 - The link to the bus station will remain tortuous, not “... along a series of good quality pedestrian routes” (Design & Accessibility statement, para 9.6)
 - There is no provision at all for encouraging visits by train. As the development is focussing on a broad visitor catchment, this is a serious error.

The extracts from PPG13 quoted in the “Parking” section above are relevant here.

The translation of the qualities of the site regarding sustainable transport to tangible plans to enhancement to ensure that sustainable transport is encouraged is often misleading; the qualities are presented as spin but not converted to concrete proposals. For example, the following extract sounds encouraging but means nothing:

9.6 Public Transport

Most of the area is within easy walking distance of the primary bus corridor, which runs through Lancaster City centre. In addition, the railway station is located approximately 600m to the North West of the CCN Development Site and the combination of Bus and Rail access makes this a highly sustainable location.

As the City currently benefits from a well established Bus Station only six minutes walk away from the Site along a series of good quality pedestrian routes, it has been agreed that the existing bus routes should not be diverted along St. Leonard Gate. Bus service information will however be provided within the scheme and space on St. Leonard Gate for the future inclusion of a bus stop should this be required. Coach drop off and pick up facilities will also be provided on Moor Lane and St. Leonard Gate for the use of shoppers and theatre goers.

The provision of information for public transport on-site and space for a potential future bus-stop is tokenistic in the extreme; it is laughable and embarrassing in terms of national best practice in encouraging sustainable transport.

Research carried out by the German Institute for Urban Research indicates that a sustainable transport approach benefits trade in German towns. It says *“Retail trade in central city districts increases with policies that encourage environmentally friendly transport modes. Of the 38 cities studied, 14 had above average retail growth. Of these 14, ten had below average provision of infrastructure for the car.”*

This illustrates our frustration with the inappropriateness and lack of informed imagination about the Centros Miller proposals.

9. Air quality

The Lancaster has a declared Air Quality Management Area (AQMA). It is

“An area encompassing the city centre gyratory system, extending 20m from the roadside (and including any property partially encompassed by this area)”

The problem is NO₂, the cause being exhaust fumes from traffic.

“Air pollution is a serious issue and the council has invested substantial time and money in addressing its responsibilities. It declared Lancashire’s first [Air Quality Management Area](#) over central Lancaster in March 2004. This was required because we expect levels of the traffic exhaust pollutant Nitrogen Dioxide to exceed one of the Government’s mandatory air quality objectives. This will mainly concern residents living in the city centre” (Lancaster City Council)

The quality of the air quality is only as good as that of the traffic modelling on which it is based. Modelling studies in Bristol have shown that the results of air quality monitoring are highly sensitive to the nature of the data on which they are based. Even so, it reveals that there will be increases in air quality problems in many sites on the highway network. It does not model the impacts in the residential area of Freehold and Newton where rat running will increase.

Para 8 of PPS23 states:

“Any consideration of the quality of land, air or water and potential impacts arising from development, possibly leading to an impact on health, is capable of being a material planning consideration, in so far as it arises or may arise from any land use.”

DEFRA has stated that

Once an authority has declared an AQMA, they are statutorily required to produce a Further Review and Assessment which will determine whether the AQMA is justified, and further monitoring is undertaken. It is also an opportunity to assess the source apportionment of the pollutant emissions and this feeds into the action planning. The Further Review and Assessment should be submitted to DEFRA within 12 months from declaration of the AQMA; so we should have received the report in March 2005; Lancaster has not yet submitted this report - we were expecting it in April 2006 but this deadline has been missed. We understand that Lancaster have now employed consultants to undertake this work and we are expecting to see a report in September this year.

We have written to Lancaster on a number of occasions in the past to chase up outstanding reports/action plan. Lancaster was also "named" in a ministerial press release in January this year which highlighted those authorities that have been late with reports. We continually remind those authorities that any delays could have a knock-on effect to the local air quality management system and could leave them open to challenge from members of the public and others.

The planning committee must reject the proposed developments on the grounds that they are incompatible with the Local Authority's requirements to tackle the defined problem of traffic-based NO₂ pollution.

10. Noise

Traffic noise causing daytime disturbance and stress and disturbs sleep.

The modelling shows that induced traffic of the site increases noise stress in a number of areas in the town.

The modelling does not cover the main residential areas of Freehold and Newton, both of which will be blighted by increased rat-running. **This is a major omission and should be addressed before the Committee can make an informed decision.**

11. Vehicle–pedestrian impacts – “accident” risk

There are no assessments at all of the implications of the traffic impacts of the proposed development. This is partly because the PARAMICS model does not cover vehicle-pedestrian interactions and accidents. This is a major omission.

The Government's casualty reduction targets for 2010 are

- *40% reduction in the number of people killed or seriously injured in road accidents compared with the average for 1994-98;*
- *50% reduction in the number of children killed or seriously injured;*
- *10% reduction in the slight casualty rate, expressed as the number of people slightly injured per 100 million vehicle kilometres.*

The Committee cannot make a decision on the proposed development until:

- 1. a comprehensive assessment is provided on the impacts of the development on vehicle collisions with pedestrians, cyclists and other vulnerable road users**
- 2. These are appraised in terms of national and other accident reduction policies and targets**
- 3. the design of the development is explicitly informed by these results**

3 Job creation claims

The non-technical summary submitted with these applications says (page 9):

A small number of jobs may be displaced by the development

And

Overall the development will create 2440 long-term jobs

We dispute both these claims.

There is no clear empirical evidence in support of the rather vague assertion that there may be displacement. Displacement means job loss and redundancy. It means that local people will lose their jobs as a consequence of this development. This is a matter of some real concern for the City Council. There is no validated assessment of the scale of job loss. This would require

some real effort of a case study nature compiling information on before and after studies of similar development in UK towns and cities.

Jobs will be lost as a result of competition from the new shopping centre and it is simply not credible to argue that an increase of retailing space in Lancaster of 50-60% will not have a damaging effect on existing city centre retailing outlets.

Section 8.86 (and following paragraphs) of the Environmental Statement provides estimates of total numbers of jobs created with a “netting off” correction. It is assumed that 390 jobs are lost elsewhere as a result of the development and this produces a net job growth figure of 1380-1475 jobs (Table 8.4 in the Environmental Statement)

This range does not tally with the figure quoted on page 9 of the non-technical summary (NTS) and the discrepancy is not explained.

The discrepancy is significant. 2440 (NTS) is much higher than the range 1380-1475

The robustness of job creation figures

We are very doubtful about the robustness of job creation figures. Section 8 of the Environmental statement simply quotes floorspace ratios e.g. every 20 sq meters of retail floorspace creates 1 job. These are generalised figures for the whole country with no account taken of regional variation. It is also interesting to note that smaller shops have much better performance level generating up to twice as many jobs per unit area as the larger shops. (English Partnerships, 2001, Employment Densities: a simple guide)

Source:

http://www.urcs-online.co.uk/webmaster3/files/urcs/website/backgroundDocuments/Document/Employment%20Densities%20-%20Full%20guide_1.pdf

Given that Centros Miller has rejected national data on trip generation and substituted local figures for car trip generation it would be consistent if they abandoned national averages on job creation per unit area of internal floorspace and substituted local figures.

We remain very sceptical of the 1 job per 20 sq meters of internal retail floorspace. At the very least this should be “reality checked” against Lancaster figures and also checked against other shopping developments 5 years after opening.

Nowhere in the documentation presented in support of these applications is there any evidence of the kind:

We forecast X jobs would be created as a result of this development

We carried out a census of jobs created 1,2 and 3 years after opening and Y jobs were created

Does $X=Y$

Displacement

We also have serious doubts about the so-called displacement. New shopping developments of the kind proposed for the canal

corridor can lead to the loss of existing jobs and to an increase in vacancy units. Under these circumstances job loss in existing centres can be serious.

This has been discussed in detail in the case of the Reading “Oracle” centre:

The great majority of town centre retailers surveyed experienced a real decline in sales volume in the year after the opening of the Oracle – a fall that could not be attributed to general trends in consumer spending in the region. The shop managers largely attributed this to Oracle effects – trade diversion, changes in pedestrian flows and disruption effects. Some of these impacts may be transitory - for example, the construction, pedestrianisation and street landscaping works and temporary vacancies while retailers relocated into the Oracle. Others, notably the spatial reconfiguration of dominant shopper patterns and the loss of comparison retail in the north of the town centre, are permanent changes.

Source: (page 16)

**Messages from the Oracle:
Assessing the Impact of Major In-Town Shopping Centres**

Neil Crosby*, Catherine Hughes*, Colin Lizieri*# and Melanie Oughton+

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<http://www.reading.ac.uk/REP/fulltxt/2905.pdf>

Basingstoke

The Malls, Basingstoke is a shopping centre in [Basingstoke](#). The centre opened in 1982 and various stores from "The Basingstoke Centre" moved there including stores such as Boots, Sainsburys and W.H Smith. The centre went in to decline in the 2000s due to competition from the more recently constructed Festival Place. As a result, some units are now vacant including the large department store unit located near the centre's Wilkinson supermarket (Alders moved out in 2005). There have been many plans to revamp the centre but to this day fairly little has been achieved, apart from the new arrival of smaller shop chains such as Tiger and Poundland more recently. The latest plan is to build a hotel above the centre, but this is unverified.

In an attempt to boost the shopping centre's appeal, a variety of events are often held in the main square, including children's small fairground rides, trade fairs and dance events. These are needed despite the square being very close to the open-air car parking facility, the Basingstoke Train Station and the main theatre, the Anvil.

Source:

http://en.wikipedia.org/wiki/The_Malls,_Basingstoke

Basingstoke has been damaged by the development of the Festival Place shopping centre. We will present photographs of this damage to traditional High St retailing at the Planning Committee when it considers the Centros Miller applications.

4 Damage to retailing in Lancaster, Morecambe and Carnforth

This aspect of the proposed development has the potential to cause catastrophic damage to the fortunes of retailing in Lancaster City centre (including the market), Morecambe and Carnforth.

A large dose of common sense is needed to deal with this subject properly.

If a resident of Bulk ward currently spends £1000 pa on non-food purchases in Lancaster city centre what will this resident do with the £1000 when faced with 35,000 sq meters of new retail space on the canal corridor site? He or she has only a few options:

1. Ignore the new development and spend the £1000 as before in the existing city centre
2. Ignore the city centre and spend the £1000 in the new development
3. Divide the spending on some kind of split (say 50/50) in each
4. Increase the £1000 to a higher sum so as to spend the same in the existing city centre but a further amount in the new development

Option 4 is unlikely in a low wage economy like Lancaster and Morecambe.

Option 1 protects the city centre and options 2 and 3 damage the city centre

No elaborate discussion of catchment areas, leakage and PR gloss can disguise the effect that patterns of spending will change. We are of the view that the elaborate discussion presented to the city Council is a smokescreen of complexity and there can be no doubt that spending patterns will change to the detriment of the existing city centre.

Patterns of spending will also change because of changes in “footfall”. The new development will trigger changes in the routes taken by pedestrians. There will be fewer pedestrian flows along Penny St, King St, China St as shoppers integrate the new opportunities provided by this development into their travel patterns, choice of parking spaces and choice of shops. This will reduce the actual number of people walking past shops in streets that are not on routes to and from the new development. This will damage retailing on:

Penny St

Common garden St

King St

China St

Church St

The absence of clear evidence of changes in pedestrian flows and densities (“footfall”) does not give us confidence that this matter has been dealt with properly.

Do new shopping developments damage existing retailing outlets?

There is a huge body of evidence that large new shopping development that are “out of town” damage nearby retailing centres. A key study in this area is the Merry Hill Impact Study (Department of the Environment, 1993). This showed severe damage to shopping centres in Dudley and Stourbridge as a result of the development of this large out of town shopping centre. Dudley has not recovered from the damage caused by the new shopping centre and this has been recognised in a more up to date regional planning report (2006):

PPS 6 requires that the RPB recognise the dynamic nature of networks of centres over time. Some centres will decline and others will rise to become more significant in the regional or a sub-regional network. Brierley Hill/Merry Hill has already supplanted Dudley town centre as the main retail centre in this part of the sub-region and in its own right is a very significant retail destination in the region as a whole. Dudley town centre does not have the physical capacity to meet the demand for additional comparison retail floorspace identified in the period up to 2021 and evidence is clear that there is a lack of market confidence.

The decline in the fortunes of Dudley town centre has meant there is currently a significant deficiency in the network of existing strategic centres in the Black Country. This deficiency is a weakness in the economic prospects for the sub-region and has led to an unbalanced Regional network of centres. Existing RSS (paragraph 7.55) identifies that “ *The network of town and city centres in Policy PA11 should be seen as a network within the polycentric concept of complementary centres rather than one of centres competing with each other.*” This is particularly important to achieve regeneration objectives in the Black Country. PA11 is not a hierarchical list of centres but a complementary network with no retail pre-eminence afforded to any centre. Adding Brierley Hill/Merry Hill to this network in place of Dudley will help re-balance the regional network.

Source:

**Regional Spatial Strategy for the West Midlands
Draft Phase 1 Revision - The Black Country
Examination in Public**

**Prepared by the West Midlands Regional Assembly
and the Black Country Consortium**

8 December 2006

http://www.planning-inspectorate.gov.uk/pins/rss/west_midlands/documents/WMRAandBCC95and76S6.pdf

The decline in adjacent shopping centres has been identified in other planning documents:

- 3.4 It is widely known that Merry Hill is a modern purpose built shopping complex that does not appear in need of regeneration. Conversely, the other strategic centres (Wolverhampton, Walsall and West Bromwich) are all believed to have suffered decline as a result of the Merry Hill development. Market trends would suggest that any proposed retail growth for Merry Hill would be implemented. However, in the past this has been at the expense of other centres including Kidderminster. In addition, there appears to be no safeguard to secure investment in all of the Black Country strategic centres and there is a possibility that historic market trends and gravitation towards Merry Hill may continue.

- 3.5 Whilst major retail developments have occurred in Kidderminster in recent years, and this has stemmed the leakage of expenditure out of the district to Merry Hill, there are signs of continuing weakness in Kidderminster town centre. It was highlighted previously that the retail assessments undertaken as part of the Black Country Study are based on Kidderminster being within the Primary Catchment of Merry Hill and so based on a continuation of the existing trends. This has been identified as being of some concern i.e. that expenditure generated by the residents of Kidderminster should be earmarked for growth at Merry Hill.
- 3.6 The two Boroughs of Dudley and Sandwell are traditionally an agglomeration of many smaller centres with perhaps Dudley and West Bromwich standing out as the largest centres. However, within the Black Country, the higher order centres of Wolverhampton and Walsall have acted as a counter balance to Birmingham. Clearly, the emergence of the out-of-centre shopping mall (Merry Hill) has had a significant impact on these established patterns both within the Black Country and beyond.

Source:



Prosperity Policy Panel

Report of: **Ken Harrison**
Principal Forward Planning Officer
Date: **12th July 2006**
Open

Regional Spatial Strategy Draft Phase One Revision: THE BLACK COUNTRY

These studies and “wake up calls” should not be dismissed because they concern large shopping development and out of town centres. The proposal currently before planning committee is a very large shopping centre and is very car dependent as we have shown in our evidence so far. If an out of town centre can damage shopping centres as widely spread as Dudley, Stourbridge and Kidderminster then a new shopping centre tacked on to one corner of Lancaster can damage Lancaster’s existing city centre retailing.

The consequences of getting this wrong are too severe to contemplate. The developer has presented no convincing evidence that the shopping centre will not damage Lancaster's existing retail outlets and the burden of proof is firmly with Centros Miller. In the absence of this proof Planning Committee should adopt a precautionary approach and dismiss the applications in order to protect the city centre.

Economic diversity, small shops and distinctive places.

Lancaster is at a crossroads. We can either go forward with lots of opportunity and space for local shops, attractive and distinctive places or we can go for large chain stores wrapped around a large car park.

The New Economics Foundation in London has drawn attention to these choices and problems and has made a plea for economic diversity and the avoidance of the chain store, expensive rents monopoly now on offer from Centros Miller. Its executive director has summarised the problem:

As it is in nature, so it is in the economy. Big superstores and chain retailers were allowed to spread by planners, town councils and governments in awe of big business. But then it started to go wrong. The chains became the economic equivalent of invasive species: hungry, indiscriminate, often antisocial and destructive. When no one was paying much attention, the superstores and cloned shops grew to dominate and suffocate the economic ecosystem.

They passed through planning regulations as easily as knotweed pushes through tarmac, devoured smaller and independent retailers with as much reflection as the Nile perch cleansing Lake Victoria of competition. They were often introduced to provide a specific service but outgrew their habitats until their cash-till song could be heard on every street corner, forecourt, roundabout and out-of-town shopping centre. Neither in balance, nor even a

boom-bust cycle with other similar, local species of shop; they began permanently to displace them.

Source:

The invasive species that are ruining the retail ecosystem

http://www.neweconomics.org/gen/tescopoly_howoneshopcameoutontopandwhyitmatters.aspx

This article was first published in the Guardian on Thursday 22 March 2007

Andrew Simms is **nef**'s policy director

The New Economics Foundation puts these views forward on a strong evidence base:

Nightmare on the High Street

Ghost Town Britain II draws together the latest statistics to show that:

- In the five years between 1997–2002, specialised stores including butchers, bakers, fishmongers, and newsagents selling confectionery, tobacco, and newspapers closed at the rate of 50 per week
- General stores have been closing at the rate of one per day
- The impact of the rising dominance of the big supermarket may be hidden, as typically there's a time lag of two-to-three years before smaller stores are forced to close, having used up their operating reserves in the battle with the big stores
- The sudden growth of 'fake local' stores under the big supermarket brands presents yet another threat to small independent stores. For example, Tesco 'Express' stores have reportedly caused drops in business of 30–40 per cent for other local shops

The Haunted High Street

Approaching the Tipping Point

In December 2002, **nef** showed that the loss of small shops and services from high streets was leading to the creation of Ghost Town Britain; a country where many villages and urban neighbourhoods have become virtual retail deserts. It warned that the surviving independent shops are approaching a minimum density, or 'tipping point', beyond which hundreds of high streets could see the complete unravelling of their retail fabric – taking the heart and soul out many of our communities.

One year on, the signs are that this tipping point is drawing perilously close. Over the past year, the lifeblood of Britain's high streets - its independent shops - has continued to haemorrhage away, and the long-term trends identified in the first *Ghost Town Britain* report have shown little sign of abating.

Over the past decade, data from the Department of Trade and Industry (DTI) shows that the nation has lost nearly 30,000 independent food, beverage and tobacco retailers – over 40 per cent of its total stock of such shops. The DTI data also shows that there has been a 28 per cent reduction in the number of these stores, translating into the closure of 50 specialist shops a week. This period has also witnessed a 12 per cent fall in the number of general stores; or 30 stores a month (see Figure 1).

Meanwhile, the high street store fronts once filled by butchers, bakers, newsagents, tobacconists, fishmongers, greengrocers, and family-owned general merchandisers are increasingly occupied by a bland carbon-copy townscape of multiple retailers, fast food chains, and global fashion outlets. The decline of local shops has forced people to travel greater distances to do their shopping, even in the largest cities. A survey of elderly London residents by Living Streets found a quarter of respondents said basic shops or services were further away.¹

Regeneration must be reoriented to support local retail not just for the sake of independent shopkeepers, but because of the central role of small shops within local economies as a whole. Businesses that expand the local economy do so partly through their 'multiplier' effect; i.e. the impact they have on other businesses through trading and wages. Research by **nef** has shown that money spent in local stores selling local produce tends to generate a higher local multiplier than the equivalent amount spent at a chain retailer. This is because large chain stores tend to procure fewer of their goods locally, and achieve most of their efficiency gains by cutting out other businesses. What's more, the employment generated by these stores is often offset by the net loss of local jobs associated with the loss of nearby shops, wholesalers, abattoirs etc.

The New Economics Foundation specifically identifies the problems associated with edge of centre developments like our own canal corridor and calls for city centre policies:

- **Local retail plans:** The loss of local shops, decay of high street shopping and development of edge-of-town shopping centres has been allowed to happen in haphazard fashion, lacking a coherent vision that would allow planners working at national, regional or local levels to make interventions based on a clear set of policy guidelines. If Ghost Town Britain is to be reversed, there is a clear need for the country to adopt retail planning guidelines, similar to those enacted in the Republic of Ireland. This legislation would provide greater power to control and cap the size of supermarkets, ensure that the town centre is the primary focus for development, and require local authorities to develop retail plans for their area.⁸²

Source:

All quotations are from the New Economics Foundation report

GHOST TOWN BRITAIN II Death on the High Street

How Britain's local economies are losing ground *and* fighting back

<http://www.neweconomics.org/gen/uploads/2hk0dtqtzv0run55afsofu4515122003114309.pdf>

The canal corridor development is a lurch towards this chain store monopoly. It will destroy local businesses and local distinctiveness and does this through its attack on the customer

base of local businesses and through its disrespect for our urban heritage (the demolition of Stonewell).

We urge the planning committee to take on board the evidence and recommendations of the New Economic Foundation and to make Lancaster a place which supports local businesses, local diversity and protects our heritage.

In doing so the Planning Committee can give practical expression to the support given by full Council when it voted to support the Local Communities Bill currently progressing through Parliament:

The Local Communities Sustainability Bill

One avenue that could allow many of the strategies outlined above to combat the Ghost Town phenomenon to be pursued more easily would be the adoption of the proposed Local Communities Sustainability Bill. This bill, which had earned the support of nearly 200 members of parliament by November 2003, promises to provide a radical realignment of power between the forces driving Ghost Town Britain and those seeking to build healthy, vibrant and sustainable local economies.

The special situation of Morecambe

Lancaster City Council has made frequent reference to its ambitions for the regeneration of Morecambe. We support these and we want to see a lively community, a diverse economy and a strong, self-confident community able to enjoy as many opportunities for its future development as Lancaster.

It is in our view wholly unacceptable to cast Morecambe into a second or third class role as far as retailing is concerned. Sensitively managed and appropriate retailing can be an engine of regeneration but it can only carry out this task if it avoids damage and if it is spread in a geographically fair manner.

It would be perverse to punish Morecambe by steering new retailing to Lancaster and by casting Morecambe in the role of a third class “convenience goods” economy. Sadly this is what the LDF Core Strategy, Submission Edition does:

4.7 Lancaster is a major centre of sub-regional significance, whereas Morecambe caters primarily for local and visitor needs. Accordingly 60% of new retail development, including most comparison goods retailing, is anticipated to be completed in Lancaster. 30%, predominantly convenience, is anticipated to be completed in Morecambe. There is an allowance of 8% for Carnforth reflecting its market town role.

Source:

http://www.lancaster.gov.uk/Documents/Planning/LDF/Core%20Strategy/Submission%20Documents/Core_Strategy_Low_Res_Edition.pdf

This deliberate and specific downgrading of Morecambe is not acceptable and it is now being put into effect through the planning applications currently before Planning Committee.

This downgrading flies in the face of the wider corporate commitment to regenerate Morecambe and it is not possible to regenerate Morecambe effectively if it is populated only by convenience goods outlets.

It is essential that Morecambe be given the breathing space and the opportunity to grow its retailing in a way that supports regeneration and supports local businesses and this can only be done by rejecting the Centros Miller planning application.