

Canal Corridor North Site

Planning Inspectorate Reference

APP/A2335/V/092095002

I/T/R/01

**Rebuttal Evidence by Professor John Walton
On behalf of It's Our City**

**Against Evidence by Lancaster City Council's
Officers and Consultants**

June 2009

1. Introduction

- 1.1 This rebuttal, for the sake of brevity, is confined to the main points. The lack of a comment on an issue does not indicate agreement with the evidence presented by officers of Lancaster City Council. This rebuttal deals only with the issues of tourism, sense of the identity of Lancaster and Inheritance.
- 1.2 The evidence presented by Mr Dobson contrasts the development proposed by Centros with no development. It's Our City see the alternative to the proposed development as regeneration-led development, sympathetic to the character of the site and Lancaster, which minimises the loss of historic buildings, uses local materials and is flexible in use.
- 1.3 Much of the Lancaster City Council's evidence is premised on the assumption that there is a shortage of retail space within the City centre. This assumption is not shared by It's Our City, who note there are numerous empty retail units in the very heart of the City Centre.
- 1.4 We are heartened that Mr Dobson, in his evidence, stresses the importance of tourism to Lancaster. This is mentioned more in his evidence than in the original proposals for the site. This underlines the fact that the proposed development was solely designed as a shopping mall to serve residents of the area and beyond coming to Lancaster to shop. It never made any pretension to be a facility for people visiting Lancaster for its heritage and ambiance. In my evidence, I shall argue that the damage inflicted on tourism by the proposed development will far outweighs any potential benefits from tourist spending in the new mall.

2. Lancaster's Tourism Offering

2.1. Historic Buildings

- 2.1.1 Mr Dobson states (8.1 and 8.2) that it is the nature of the development, rather than whether or not development should take place on this site, that is the issue. We note that it is his personal conclusion that the demolition of historic buildings on the site is warranted by the enhancement to retail capacity afforded by the proposed development.

- 2.1.2 The need for the scale of extension to the retail centre is questioned elsewhere. Here the concern is how demolishing historic landmarks can contribute to:

Understanding and respecting the character and distinctiveness of places and

the protection and enhancement of the historic environment
(RSS Policy DP7)

- 2.1.3 Like the Campaign to Protect Rural England, we believe the proposal contravenes these policies and

'the demolition of historic buildings in a conservation area, and the construction of an anodyne "anytown" shopping centre, which will be on a scale (in terms of floorspace, height, and visual impact) that entirely fails to fit the character, function or needs of the city. This will be damaging not just to the historic character of the city and the quality of life of its residents, but to Lancaster's longer-term economic prospects.'

2.1.4 It's Our City also disputes that Lancaster City Council has fulfilled its obligation to proceed in accord with a set sequence for development which begins with:

'the use of existing buildings (including conversions)'
(RSS Policy DP4)

by careful consideration and rejection.

However the reuse of existing buildings and preservation of heritage assets was very carefully considered in the formulation of the proposals.
(Dobson V3, Page 18)

2.1.5 The "careful consideration" followed by rejection, reveals a deplorable lack of imagination in dealing with this sensitive site. Alternative plans have demonstrated how development can use and enhance the existing historic fabric of the City and bring regeneration to the area. Like other consultees (Victorian Society and CPRE), we believe the loss of clusters of familiar buildings, the unique roofscape, local architecture reflecting a variety of historical styles and street layout will impoverish the inheritance of the City and its potential for heritage tourism.

2.1.6 Similarly Mr Dobson contends that Lancaster City Council has fulfilled its obligation to

'protect, conserve and enhance the historic environment supporting conservation-led regeneration in areas rich in historic interest'
RSS Policy EM1 (c)

by agreeing to knock down a number of historic buildings and destroy the street pattern. We fail to understand how reducing the stock of historic buildings can

'conserve and enhance the historic environment'
(*'Historic Towns and Cities in England's Northwest'*)

which Lancaster City Council 'is charged to protect'.
(Dobson V3, Page 26)

2.2 Views

- 2.2.1 The Development will be visible from the Castle area, Williamson's Park and other areas of the City which attract visitors. This will diminish the heritage tourism offering rather than:

'complement Lancaster as a historic city and assist in the development of its tourism and heritage offer'
(Dobson V3, Page 23)

2.3 Connectivity

- 2.3.1 There is considerable concern about the proposed pedestrian bridge to connect the current City Centre with the new shopping centre and the importance of 'connectivity' is recognised. While improved tourism is aspired to (paragraph 4.8) the proposed development will exacerbate a major problem of connectivity for visitors to Lancaster.

- 2.3.2 The proposed development with its extra car parking will generate extra traffic on the A6 gyratory system. This has already been identified by the North West Development Agency and English Heritage (Historic Towns and Cities in England's Northwest) as causing severance between the Historic Quarter, the major attraction for visitors, and the retail centre which contains the independent shops, cafes and restaurants sought by visitors. This is an important reason why Lancaster *'under-performs as a heritage asset'* (Dobson V3, paragraph 4.8). Increased traffic will not only make Lancaster less attractive as a destination, but makes it less likely that visitors will venture into the City Centre to increase their spending in the City.

- 2.3.3 Mr Cassidy in his proof of evidence (pp48-49) suggests the scheme increases the potential to increase 'connectivity' between the Castle and Quayside area. We fail to see the connection or how this compensates for the increased severance between the Historic Quarter and the existing City Centre.

2.4 Retailing

- 2.4.1 The original plans largely ignored the impact of the proposed development on tourism. Now it is claimed that a new shopping mall will enhance the tourism offering of the City and area (Dobson V3, page 23). This overlooks a fundamental tourism principle that people are seeking individuality, uniqueness of place and, in the case of heritage tourism, connection with previous ages.

- 2.4.2 Such tourists prefer small, independent and even 'quirky' shops, cafes, pubs, etc preferably in older buildings, not chain or franchised outlets in a modern development which they can find in their home towns. Not only will the proposed development not provide the type of outlet favoured by tourists, its presence would jeopardise the existence of such independent traders. By pulling local trade away from the City Centre, the new shopping mall will undermine their customer base.

- 2.4.3 These consequences are also raised by Lancaster Chamber of Commerce and GEP (West) Limited (the owners of the property currently occupied by Marks and Spencer in Penny Street) in their written submissions.
- 2.4.4 More closures within the City Centre will create a bleak aspect of more empty shops and businesses, making it even less attractive to visitors.
- 2.4.5 York, Chester, Carlisle and Cambridge are given as examples of where new shopping exists alongside the historic environment (Dobson V3, page 16). The success of these centres has been created by careful preservation and adaptation of historic buildings and nurturing independent traders. The current proposal would decrease the stock of adaptable buildings and increase retailing area on the edge of the town at a time when the City Centre has over 50 empty retail units and projections of growth are being revised downwards.

3. Inheritance and Local Identity

- 3.1 Mr Dobson justifies the loss of street patterns and clusters of buildings which form landmarks in the geography of Lancaster, as well representing its history and variety as sacrifices necessary for the benefits to the community. This is despite clear indications that the people of Lancaster do not want this area dedicated to a shopping mall. The survey conducted by Real Planning for Lancaster found that people wanted more small shops, facilities for children and young people and improvement of the canalside. Large and medium-sized retail was at the bottom of the list of what was wanted.

Another indication of people's wishes for the area is their voting patterns at local elections. Since the plans were made public, the ward affected has consistently voted in local councillors who oppose the project.

4. Conclusions

The evidence provided by Mr Dobson and Mr Cassidy suggests that 'considering and rejecting' the provisions of Regional Spatial Strategies, Lancaster District Core Strategy and other national and local guidelines indicates Lancaster City Centre has complied with them. In particular they have not justified breaking the following requirements:

- Understanding and respecting the character and distinctiveness of places and landscapes
- Protect and enhance the historic environment

RSS Policy DP7

- Plans, strategies, proposals and schemes should protect, conserve and enhance the historic environment supporting conservation-led regeneration in areas rich in historic interest

RSS Policy EM1

Development should accord with the following sequential approach:

- first using existing buildings (including conversions) within settlements and previously developed land within settlements;

RSS Policy DP4

- Plans and strategies will:
 - Support sustainable growth in Lancaster ...ensuring development is compatible with the conservation of the historic city

RSS Policy CNL4

- The Council will safeguard and enhance the District's Environmental Capital by:
 - Ensuring that development in the city of Lancaster and other historic areas conserves and enhances their sense of place:

Core Strategy Policy E1

In my evidence, I will demonstrate that the proposed development threatens Lancaster's tourist offering and economy in the following ways:

- Reducing the City's heritage assets by demolishing historic buildings,
- Diminishing the quality of the views from popular tourist sites and routes,
- Increasing the severance of the Historic Quarter from the City Centre by increasing traffic on the A6,
- Undermining small, independent traders who provide the kind of cafes, restaurants and shops sought by the kind of tourists attracted to Lancaster.

and that more imaginative, regeneration-led development would improve the tourism offering and economy.

I will also show that the proposed development fails to protect current and future residents' and visitors' sense of place by destroying familiar landmarks and street patterns, failing to respect the distinctiveness of the site and of Lancaster and planning a shopping mall design with nothing to distinguish it from similar malls around the country. The loss of this sense of place and belonging is made even more acute by the way the plans have been drawn up and pursued in the face of considerable opposition from local people who have made it clear that this is not their desired option for this critical site in their City.