

Matter 4 – Retail and Town Centre Uses (including Blackpool Town Centre, Winter Gardens, Central Business District and Leisure Quarter)

We have only responded to the questions that directly relate to the representations made by Blackpool Pleasure Beach.

Question 4.3: Is there potential conflict between policy CS4, which states that town centre uses will be permitted outside centres only if the listed criteria (a) – (d) are met and policy CS21 which states that tourism attractions will be supported in the Town Centre and Resort Core? Should the policies or their supporting text be modified to give clearer guidance on the type of main town centre uses which will be permitted outside of the Town Centre but within the Resort Core? (see also Matter 7)

It is clear from the name of Policy CS4 (“Retail and Other Town Centre Uses”) that this policy covers not just retail but all other Town Centre Uses, as defined in the National Planning Policy Framework (NPPF). The NPPF definition of Town Centre Uses includes “leisure, entertainment and tourism development”. Part 3 of this policy would apply to those parts of the Resort Core that fall outside the defined Town Centre boundary. We set out in our representations why it is important that leisure, entertainment and tourism development can take place in the Resort Core outside the Town Centre. As the UK’s leading coastal leisure, entertainment and tourism destination, Blackpool’s success has been built on development of this type taking place throughout the Resort Core, particularly on the seafront. However, the criteria within Part 3 of the policy require any applications to be accompanied by a sequential assessment (criterion a), impact assessment (criterion b), assessment of the extent to which the proposal would undermine Council policies (criterion c) and demonstration that the proposal will be accessible by sustainable modes of transport (criterion d), which is quite onerous.

This makes it more difficult and costly to bring forward leisure, entertainment and tourism development in the Resort Core outside of the Town Centre. This is a significant change to the Council’s approach in the previous Local Plan (although we still question whether it is an intended one), and is unwelcome at a time when the resort is relying on significant private sector investment to deliver resort regeneration.

In the Council’s November 2014 response to Blackpool Pleasure Beach’s representations, it states that:

“Core Strategy policies are to be read as a whole. Policy CS21 specifically supports new high quality tourism attractions in Resort Core”.

We acknowledge that Policy CS21 supports proposals for new high quality tourism attractions focused on the town centre and resort core, and indeed the Pleasure Beach formally supported this policy.

It is clear, however, that as currently drafted there is a contradiction, which could create confusion for potential developers of attractions as they may not know which policy takes precedence, or may even only look at Policy CS4 and not make it as far as Policy CS21.

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In addition, it could also be read that there isn't actually a conflict, just a higher bar to achieve if leisure, entertainment and tourism development is to be brought forward in the resort core outside the town centre. In other words, Policy CS21 supports tourism development in the resort core, but Policy CS4 adds an extra layer of technical work if you want to bring forward this type of development in the resort core outside the town centre. There is potential for this to have an impact on the level of investment coming forward, which may not be able to support costly technical assessments. So it is not just a question of whether there is a conflict; the issue of whether having a two-tier policy that allows leisure and tourism development in the town centre without the additional technical work, but elsewhere in the resort core only with the additional technical work, is an appropriate approach. We do not consider that it is an appropriate approach. Again we question whether it is really the intention of the Council to require a greater level of supporting information for leisure, entertainment and tourism development in those parts of the resort core that fall outside the town centre. But regardless of that, this is how the Policy will operate unless amended.

Looking at the supporting text of Policy CS4 (paragraphs 5.47 to 5.58) this only actually refers to retail issues. There is no reference to any other town centre use anywhere in this section of the Plan. This supports our view that this policy conflict was not intentional, and that it is simply a drafting issue. It seems to us, therefore, that the simplest way to resolve this issue would be to just remove reference to "and other town centre uses" in the title, policy, and in the text (paragraph 5.48). Removing this reference will have no impact whatsoever on how the Policy functions, as the Policy is only seeking to guide retail development to town, district and local centres. It would be entirely consistent with NPPF.

The proposed amended wording set out in our representations would deal with this. However, we suggest that the phrase "other town centre uses" is deleted more extensively in the policy, as follows:

"Policy CS4: Retail ~~and Other Town Centre Uses~~

1. In order to strengthen Blackpool Town Centre's role as the sub-regional centre for retail on the Fylde Coast, its vitality and viability will be safeguarded and improved by:
 - a. Focussing new major retail development in the town centre to strengthen the offer and improve the quality of the shopping experience
 - b. The preparation and implementation of a Town Centre Strategy and Action Plan, working with stakeholders to arrest decline and restore confidence in the town centre
2. For Town, District and Local Centres within the Borough, retail ~~and other town centre uses~~ will be supported where they are appropriate to the scale, role and function of the centre.
3. In edge of centre and out of centre locations, proposals for new retail development ~~and other town centre uses~~ will only be permitted where it can be demonstrated that:
 - a. There are no more centrally located/ sequentially preferable, appropriate sites available for the development
 - b. The proposal would not cause significant adverse impact on existing centres

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c. The proposal would not undermine the Council's strategies and proposals for regenerating its centres

d. The proposal will be readily accessible by public transport and other sustainable transport modes

4. The Council, through the Site Allocations and Development Management DPD, will identify a range of sites for new retail development in Blackpool Town Centre to allow for new comparison goods floorspace over the plan period."

If the Council does want to include some reference to leisure, entertainment and tourism development in this section of the Plan, they could insert the additional clause that we proposed in our representations. If the Council wishes to limit this policy to retail matters only (and we suspect that they do, for the reasons set out above), it would be helpful if some reference could be made in the policy that tourism-based retailing would be acceptable in the resort core outside the town centre. This would allow for the further development of tourism retailing at the Pleasure Beach and also for the continued development of retailing serving those who are visiting Blackpool that already exists along the seafront in the resort core, which is an important part of the character of the resort.

This could be addressed by the addition of a clause at the end of Part 3 of the Policy, stating: "In the Resort Core, proposals for tourism-related retailing will be permitted, providing that it complies with criteria b-d in Part 3 of the Policy" (i.e. it does not have to demonstrate that there are no sequentially preferable sites available).

Question 4.11: Is it appropriate and necessary to the soundness of the plan for policy CS20 to state that major comparison retailing or amusement park development will not be permitted in the Leisure Quarter?

We set out in our representations why we considered it to be necessary to restrict amusement park development on this site. Blackpool Pleasure Beach is a unique, internationally-renowned visitor attraction. It is the largest traditional amusement park in the UK, and offers a visitor experience that is the highest regarded of any similar attraction in the country. In 2014, it was recognised as having received the highest ratings of any theme park in the UK on TripAdvisor. It is also home to a remarkable collection of historic rides and buildings, some the oldest of their kind in the world, which operate alongside some of the largest and most high-tech attractions operating in any theme park. The scale of the operation, and its historic and cultural importance is such that it is highly vulnerable to the introduction of similar development closer to the centre of Blackpool. Such development may have very little infrastructure cost. For example, the stationing of travelling fairground rides on the Leisure Quarter as part of a comprehensive redevelopment would involve little investment, and the rides could be easily removed at a later date. But the impact of such a development on the Pleasure Beach could be very damaging. As Blackpool's most-visited attraction, any development which harms the Pleasure Beach and makes it less attractive to visitors would also have an impact on the resort's ability to attract visitors.

In its November 2014 response to Blackpool Pleasure Beach's objections, the Council stated that guidance on acceptable uses is set out in the adopted Development Brief SPD (March 2011). However, this document does not in any way prevent amusement park/funfair development in the Leisure Quarter.

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Objective 14 of the Core Strategy (Goal 3) states that a key objective is to ***“sustain a high quality, year-round visitor offer by growing and promoting our tourism, arts, heritage and cultural offer”***. It is therefore fundamental to the soundness of the Plan that all policies work together to achieve this objective. Policy CS20 is a key tourism policy, which aims to initiate the regeneration of one of the most important regeneration sites in the town. It is important that any such development does not undermine any of the iconic features that make Blackpool such a distinctive destination. A distinctive resort requires distinctive planning policies.

Development that could undermine the viability of the Pleasure Beach could have far-reaching consequences on the achievement of this objective, and therefore for the success of the tourism policies (and indeed all policies aiming to secure growth in the town’s local economy) in the Core Strategy. There is no justification for this policy to allow for development that could undermine the Pleasure Beach, and the policy would not be effective in achieving the wider objectives of the Plan if it was adopted in this form.

We therefore consider it to be appropriate and necessary to the soundness of the Plan for Policy CS20 to restrict amusement park development in the Leisure Quarter.