



HEARING STATEMENT

BLACKPOOL SITE ALLOCATIONS AND DM POLICIES MATTER 5, ISSUE XII

On behalf of:
Pavilion Property Trustee Limited and Pavilion Trustees Limited
Respondent Ref. 16

In Respect of:
Clifton Retail Park, Clifton Road, Blackpool

Date:
November 2021

Reference:
RLP016-R002

1.0 Introduction

- 1.1 This statement has been prepared on behalf of Pavilion Property Trustee Limited and Pavilion Trustees Limited, trustees of the Blackpool Unit Trust, and owners of Clifton Retail Park at Clifton Road in Blackpool. It supplements the representations made to the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies (SADMP) in April 2021.
- 1.2 This statement addresses Matter 5, issue (xii) of the Inspector's matters, issues and questions which are of specific relevance to our clients as they relate to the SADMP's development management policies.

2.0 Matter 5

- 2.1 The Inspector asks at matter 5: *"Are the SADMP's development management policies justified, effective, consistent with national policies and clearly and unambiguously written so it is evident how a decision maker should react to development proposals?"*
- 2.2 We do not repeat the detailed submissions made at Regulation 19 stage, however we maintain our previously established view that we do not consider that the Blackpool Local Plan Part 2 development management policies meet the NPPF test of soundness. This is on the basis that they unrealistically assume that all of the identified retail capacity over the plan period will be accommodated in Blackpool town centre, and do not give any consideration to those ranges of goods which have specific out of centre locational requirements, such as bulky goods.
- 2.3 We also contend that there is a gap in the proposed SADMP, whereby the role which established out of centre retail destinations (such as the Clifton Retail Park) fulfil is not acknowledged, nor is any policy context to support managed change at these locations over the plan period proposed.
- 2.4 We therefore remain of the view that a failure to address these important wider retail issues means that the Local Plan Part 2 will not meet the areas objectively assessed needs and has not therefore been positively prepared, is not justified and is not consistent with national policy to deliver sustainable development.
- 2.5 As part of this matter, the Inspector asks at issue (xii) *"Are the SADMP's economy development management policies soundly based?"*, with a series of specific questions posed about specific policy matters.
- 2.6 We note that none of these questions directly relate to the issues faced by the owners of Clifton

Retail Park in seeking to identify how change can be managed at this location over the plan period.

- 2.7 To address this, our first preference would be for the Inspector to consider the inclusion of a development management policy which recognises the function of established out of centre retail locations. This should also deal specifically with the preference for further retail uses which cannot be accommodated within the town centre (such as bulky goods) to be directed towards existing out of centre retail destinations which are identified in the plan, as opposed to other new locations. This would include the Clifton Retail Park.
- 2.8 Potential working of this policy could read: "*Outside the town, district and local centres, the Council will support appropriate new retail investment that is focused on established retail locations and does not undermine the core strategy focus to strengthen Blackpool Town Centre's role as the sub-regional centre*". This would be accompanied by the identification of the Clifton Retail Park as an out of centre location which could accommodate those ranges of goods incapable of being provided for within the Town Centre.
- 2.9 This positive policy position would, in our view, allow identified retail needs to be fully catered for over the plan period and bring the SADMP into line with the NPPF requirement to deliver sustainable development.
- 2.10 In the event that this approach is not acceptable to the Inspector, then an alternative would be to consider the role which the Clifton Retail Park plays under the terms of the existing policy provisions set out in DM14, which has regard to District and Local Centres.
- 2.11 To date we have accepted that the Clifton Retail Park is an established out of centre retail destination, however it also objectively fulfils the role of a District Centre, being a group of shops which serve a part of an urban area with a specific geographic focus, separate from the town centre, but with more variety than local centres.
- 2.12 The Clifton Retail Park may therefore benefit from inclusion as a centre under the terms of policy DM14, and with future change capable of being managed under the associated criteria.

3.0 Conclusion

- 3.1 Pavilion Property Trustee Limited and Pavilion Trustees Limited maintain their position that Clifton Retail Park should be afforded a formal allocation within the emerging SADMP which reflects the important retail function which it performs. We also request that a policy is introduced to the SADMP which identifies the opportunity for some of the forecast retail capacity to be accommodated

at Clifton Retail Park, especially for those bulky ranges of goods which cannot be accommodated within Blackpool town centre.

- 3.2 This approach will ensure that the Blackpool Local Plan Part 2 complies with the NPPF soundness test.
- 3.3 We welcome the opportunity to participate further in the hearing on this specific matter, and to provide the Inspector with any further evidence required to support our position.