

Participant 28: Blackpool Pleasure Beach

Matter 7 – Blackpool Resort Core (Policies CS1, CS21, CS22, CS23)

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

Question 7.1: Is the plan positively prepared, aspirational but realistic in terms of tourism accommodation and facilities?

In our view the Plan is generally positively-prepared, aspirational and realistic in terms of tourism facilities. Blackpool Pleasure Beach supported Policy CS21, although we had an objection to CS22 on car parking grounds (see below).

Question 7.2: Is the strategy of seeking to focus new tourism accommodation and facilities within the Resort Core/Town Centre soundly based and supported by relevant evidence?

Blackpool Pleasure Beach supports this approach, subject to the conflict between Policy CS4 and CS21 being resolved. The evidence supports the Resort Core being appropriately defined, with development being focused on those areas that are Blackpool's main 'shop front'. This is a well balanced strategy, which we consider will be effective.

7.3 Is there potential conflict between policy CS4, which states that town centre uses will be permitted outside centres only if the 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 4)

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 (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:

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“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 to Policy CS21.

In addition, it could be read that Policy CS21 supports tourism development in the resort core, but that 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 this additional technical work is needed. 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.

Looking at the supporting text of Policy CS4 (paragraphs 5.47 to 5.58) this only actually refers to retail issue. There is no reference to any other town centre use anywhere in this part 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.

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.

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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
 - 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, 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).

7.4 Does policy CS21 (2) provide sufficient support for enhancement/expansion of existing tourism facilities outside of the Resort Core/Town Centre?

We consider this to be appropriate, as the focus is on existing outdoor leisure and recreation facilities, which provide lower key venues for visitors and also provide for residents. Focusing tourism development over too wide an area would have the effect of diluting the benefits. For this reason, we support the statement in Paragraph 7.30 that proposals for resort attractions outside of the resort core and town centre will generally not be permitted.

7.7 Should the part of paragraph 7.39 concerning car parking be included in policy CS22 itself? Would the policy as currently worded enable refusal of a development on an existing car park which would undermine the resort's ability to accommodate visitor trips? (see also Matter 5)

Blackpool Pleasure Beach's view is that retention of parking is a key issue to ensure the continued viability of resort attractions and should be set out in the policy.

We provided potential wording in our representations. We do not consider that moving the content of paragraph 7.39 into the policy alone would be sufficient as the wording as currently drafted is

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insufficiently robust. It does not make a clear enough statement that existing levels of parking must be retained, and that development proposals should show how any car parking that is lost will be relocated, and ensure that this results in a situation that is no worse than the current arrangement, particularly in terms of location, route quality, etc. It would not, in our view, enable refusal of a development on an existing car park which would undermine the resort's ability to accommodate visitor trips

This is because the policy as currently worded does not currently require an assessment of the resort's ability to accommodate visitor trips. It mentions "improved parking and reception facilities", which could mean the improvement of the environment but a lower quantum of spaces. Whilst an improvement in the environment of the parking areas would be welcomed, the overall quantum is more important for the reasons set out in our representations.

As set out in our response to Matter 5, it is not necessary for all of the wording that we proposed in our representations to appear in the policy. Some of it could be relegated to supporting text as we have set out in Matter 5. But it is a significant issue for the Pleasure Beach and we need to ensure that the policy is clear and unambiguous so that the overall objectives of the Core Strategy are not undermined by piecemeal erosion of car parking capacity.