

**BLACKPOOL LOCAL PLAN**

**PART 1: CORE STRATEGY**

**BLACKPOOL COUNCIL STATEMENT**

**MATTER 4**

**RETAIL AND TOWN CENTRE USES (INCLUDING BLACKPOOL TOWN CENTRE,  
WINTER GARDENS, CENTRAL BUSINESS DISTRICT AND LEISURE QUARTER)**

**APRIL 2015**

**Blackpool Council**

The logo graphic consists of two horizontal, wavy lines in a light blue-grey color, positioned below the text 'Blackpool Council'.

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

**(Policies CS1, CS4, CS17, CS18, CS19, CS20)**

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### **Introduction**

This Statement has been produced by Blackpool Council to outline its response to the Matters and Questions raised by the Inspector for the Hearings into the Blackpool Local Plan Part 1: Core Strategy Development Plan Document (SD001).

The Statements form the main basis for the Council's submission to the Hearings. Where appropriate the Statements draw upon and cross reference to the main sources of information used in the preparation of the Core Strategy. To assist document numbers are referenced where appropriate.

### **Position of the Council regarding Matter 3**

#### **4.1 Is the plan positively prepared, aspirational but realistic in respect of retail development and town centre uses?**

4.1.1 The Council considers that the Plan has been positively prepared is aspirational but realistic in respect of retail development and town centre uses.

4.1.2 Policy CS1: Strategic Location for Development identifies Blackpool Town Centre as a key location for regeneration, recognising its pivotal role in driving the local economy and providing a sub-regional centre for the Fylde Coast in terms of retail, services, business, cultural and leisure activities. Policy CS17: Blackpool Town Centre sets out a comprehensive approach to re-establishing and strengthening its role as the sub regional centre. Three strategic sites are identified in the Town Centre - the Winter Gardens (CS18); Central Business District (Policy CS19); and Leisure Quarter (Policy CS20). These sites provide key opportunities to strengthen the retail, leisure and business offer and regenerate the town centre.

4.1.3 Policy CS4 sets out the policy approach in the Borough to retail development and other town centre uses. Directing new major retail development to Blackpool Town Centre to safeguard its vitality and viability as well as strengthening the offer and improving the quality of shopping along with the preparation and implementation of a Town Centre Strategy and Action Plan. The Town Centre Strategy has been prepared alongside the Core Strategy and was adopted by the Council in March 2013 (AD006). Policy CS4 also sets out the approach to smaller centres supporting retail and other town centre uses where appropriate in scale, role and function of the centre.

- 4.1.4 Policy CS4 along with policies CS1 and CS17 have been informed by the findings of the Joint Fylde Coast Retail Study 2011 and Appendices (EB010); work undertaken on the Blackpool Town Centre Strategy; and policy in the National Planning Policy Framework. The Fylde Coast Retail Study provides a quantitative and qualitative assessment of the key towns and centres across the Fylde Coast and provides an assessment of options and recommended strategy for improving the Fylde Coast's sub-regional offer (EB010 page 93 to 99). The study highlights that Blackpool Town Centre is underperforming as a sub-regional centre and that in the interests of the Fylde Coast sub-regional as a whole that Blackpool Town Centre's position as a strong sub-regional centre should be restored thereby reducing the unsustainable leakage of expenditure that currently flows to out of centre locations within the Fylde Coast and to competing centres outside the Fylde Coast.
- 4.1.5 The study considered three scenarios in the distribution of future comparison floorspace and recommended to plan for a future capacity that is based on 'moderate increase in retention rates' of expenditure. This 'moderate' approach was considered to enable the Fylde Coast Authorities and partners to meet our aspirations for the Fylde Coast Centres, whilst ensuring that such aspirations are realistic and deliverable. The study also recommends with respect to Blackpool that not all the residual expenditure capacity identified is used to support new comparison floorspace, there should also be a focus on refurbishment and replacement of underperforming stock so that it can trade more efficient and viable sales densities. The recommendations in the retail study have also been carried through to and informed the vision, key aims and priorities for intervention in the Town Centre Strategy.
- 4.1.6 Subsequent to the 2011 Fylde Coast Retail Study, a 2013 retail update was undertaken to provide further clarification on retail matters relating to Fylde and Wyre Boroughs. Our response to Question 4.2 addresses this matter.

**4.2 Is the statement in paragraph 5.52 that there is capacity for 16,390 sq m of additional comparison goods floorspace in Blackpool Town Centre supported by up to date evidence? Is the 2013 Update of the 2011 Fylde Coast Retail Study of relevance to the plan?**

- 4.2.1 The Core Strategy proposals in respect of new comparison shopping floorspace in Blackpool are considered to appropriately align with the evidence concerning the Fylde Coast as a whole.
- 4.2.2 Policy CS4 along with policies CS1 and CS17 have been informed by the findings of the Joint Fylde Coast Retail Study 2011 and Appendices (EB010); work undertaken on the Blackpool Town Centre Strategy; and policy in the National Planning Policy Framework. The Fylde Coast Retail Study (FCRS) provides a quantitative and qualitative assessment of the key towns and centres across the Fylde Coast and provides an assessment of options and recommended strategy for improving the Fylde Coast's sub-regional offer (EB010 page 93 to 99). It also establishes the hierarchy of centres within the study area of which Blackpool is the sub-regional centre for the Fylde Coast and centres within Fylde and Wyre are at a lower

level in the retail hierarchy. The study highlights that Blackpool Town Centre is underperforming as a sub-regional centre and that in the interests of the Fylde Coast sub-regional as a whole that Blackpool Town Centre's position as a strong sub-regional centre should be restored thereby reducing the unsustainable leakage of expenditure that currently flows to out of centre locations within the Fylde Coast and to competing centres outside the Fylde Coast.

- 4.2.2 An update of the 2011 FCRS was commissioned by Fylde Borough Council and Wyre Borough Council in September 2013. The purpose of this report was to address quantitative issues and to extend the study period to 2030 (the end of the current development plan period for the two authorities). These revised figures are to be used to update the distribution of floorspace requirements within the centres of the two authorities.
- 4.2.3 The 2011 FCRS provided three forecasts of the quantitative need for additional comparison goods floorspace (paragraphs 6.37 and 6.38) – a 'Static Retention' scenario, whereby current shopping patterns remain unchanged over the course of the period to 2026 (i.e. the current retention rate of 75 per cent stays the same), a 'Moderate Increase in Retention' scenario, whereby a modest increase in the retention rate from 75 per cent to 80 per cent is achieved by 2026, and a 'Significant Increase in Retention' scenario whereby a more significant increase in the retention rate from 75 per cent to 82 per cent is achieved by 2026. The conclusion reached in the FCRS was that there was justification to plan for a moderate increase in the retention level, so as support the performance of Blackpool Town Centre as the sub-regional centre for the Fylde Coast and to reduce the level of unsustainable shopping trips to destinations beyond the catchment area.
- 4.2.4 However, in updating figures for Fylde and Wyre, the consultant reconsidered the approach to retention rates. The 2013 Update is therefore presented on the basis of static retention rates for convenience and comparison goods expenditure. The 2011 FCRS distributed comparison floorspace requirements on the basis of a moderate increase in retention rates from 75 per cent to 80 per cent. The consultants considered the static retention scenario to be more robust for the case of the lower order centres in Fylde and Wyre given that the higher order centres of Preston and Lancaster will continue to draw trade from the sub-region and that parts of the boroughs of Fylde and Wyre clearly fall within the established catchment areas of these centres. The moderate increase in comparison goods expenditure retention envisaged by the FCRS was intended to support Blackpool Town Centre. This consideration is less relevant to updating floorspace requirements for Fylde and Wyre where centres would not necessarily benefit from increased retention as a result of improvements to Blackpool's offer.
- 4.2.5 As far as Blackpool Council are concerned, the modest rate of retention is the most appropriate approach for Blackpool Town Centre with the identified need to reduce the level of unsustainable shopping trips to destinations beyond the catchment area. The approach recognises the need for Blackpool Town Centre to increase its market share within the Fylde Coast sub-catchment, thereby clawing back some of the expenditure which is currently being lost to competing destinations. The Core Strategy policy supports this

approach to strengthen Blackpool Town Centre's role as the sub-regional centre for the Fylde Coast, improving its vitality and viability by focussing new retail development on the town centre to strengthen the retail offer and improve the quality of the shopping experience.

**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)**

4.3.1 With regards to tourism, National Planning Practice Guidance requires local councils to identify optimal locations for tourism in the Local Plan. In Blackpool's case these locations are identified in policy CS21 as the Town Centre and Resort Core. The justification for these areas is set out in the response to Matter 7, Question 7.2.

4.3.2 Policy CS21 provides the strategic policy framework for leisure and business tourism. Regeneration of Blackpool's resort core and town centre is focused on strengthening the resort's appeal to attract new audiences. Proposals for new high quality tourism attractions will be focussed on the resort core and town centre. The supporting text at paragraph 7.28 recognises the overriding need to raise all aspects of the visitor experience, focusing investment and development within the established resort core and town centre. Opportunities for major new high quality leisure development drawing large numbers of visitors and making a strong contribution to resort regeneration are key to developing an exciting and unique year round resort destination and supporting a sustainable economy.

4.3.3 Saved policy RR1 of the adopted Local Plan (AD007) provides further detailed development management policy with regards to Visitor Attractions. The supporting text to policy RR1 provides the context to the type of visitor/tourism attractions to which the policy applies including the Pleasure Beach, piers, Blackpool Tower and Coral Island.

4.3.4 Any planning application received by the Council would be considered on its own merits. If a proposal was to come forward for a tourism/visitor attraction, consideration against policies CS21 and RR1 would take precedent over Policy CS4.

4.3.4 A modification to the supporting text of policy CS4 to cross reference to policy CS21 may provide additional clarity and explanation that tourism development will be considered under policy CS21.

**4.4 Is MM025 (replacing “exploiting” in policy CS17 1c with “protecting and enhancing) necessary to soundness?**

4.4.1 This minor modification enables the wording of policy CS17 to more appropriately reflect Section 12 of the National Planning Policy Framework and responds to the representation received from English Heritage.

**4.5 Are policies CS17 and CS18 sufficiently clear about the type of retail development which would be supported in the Winter Gardens? And is a strategy promoting retail development in the building (other than that ancillary to other uses) soundly based?**

4.5.1 The Council considers that policies CS17 and CS18 are sufficiently clear about the type of retail development which would be supported in the Winter Gardens.

4.5.2 The Winter Gardens is an all-weather entertainment complex located within the Town Centre, directly adjacent to the Principal Retail Core. It has a number of external facing units fronting St Johns Square/Church Street and Coronation Street. These units are occupied by various uses including retail and food and drink.

4.5.3 The Council purchased the Winter Gardens in 2010 and is actively looking to secure medium-long term investment to facilitate major refurbishment and re-establish the complex as a multi-purpose, year round entertainment, leisure and conference venue in the heart of the town centre.

4.5.4 Part 3(c) of policy CS18 supports retail uses that functionally integrate with the adjacent retail core. Paragraph 7.5 of policy CS17 supports the introduction of a specialist complementary retail offer within the Winter Gardens. Flexibility is required to allow retail uses which support the long term sustainability of the Winter Gardens and do not conflict the existing retail function of the Town Centre.

4.5.5 The Winter Gardens Conservation Management Plan will inform all future development in order to ensure that any development does not have a detrimental impact on the heritage value of the Winter Gardens. The Complex is also a Listed Building so any development will also be subject to Listed Building legislation

4.5.4 The promotion of certain retail development in the building is soundly based. As discussed above, the Complex is located within the Town Centre adjacent to the retail core. The potential for retail uses within the Winter Gardens is evidenced in the Fylde Coast Retail Study (EB010). The Study recognised that in the comparison goods sector, the opportunities presented by the Houndshill Phase II Extension, the Central Station Site, and the Winter Gardens redevelopment, all present opportunities to enhance the comparison goods offer in the Town Centre through growth and change.

4.5.5 The promotion of certain retail development also aligns with Paragraph 126 of NPPF which states that LPAs should take into account the desirability of sustaining and enhancing heritage assets and putting them to viable uses consistent with their heritage.

**4.6 Does policy CS18 provide a positive strategy for the conservation and enjoyment of the Winter Gardens? Should the policy specifically refer to the “conservation and enhancement” of the building?**

4.6.1 The Council considers that policy CS18 sets out a positive strategy for the conservation and enjoyment of the Winter Gardens. It promotes positive change to the building to ensure its long term sustainability, conserving its heritage and promoting the enjoyment of the Complex, encouraging supporting uses that will create more reasons to visit.

4.6.2 The policy supports refurbishment to enhance the appeal and status of the Winter Gardens. The theme of the policy is clearly conservation and enhancement of the complex although it does not explicitly refer to it in the policy. It is considered that the policy does not need to specifically refer to the ‘conservation and enhancement’ of the building.

**4.7 Is it appropriate and necessary to soundness for policy CS18 to require that developments will be financially self-sustaining and that income generated should be used to maintain and enhance the heritage asset?**

4.7.1 It is not appropriate or necessary to soundness for policy CS18 to require that developments will be financially self-sustaining and that income generated should be used to maintain and enhance the heritage asset. This is considered to be beyond the remit of planning policy.

4.7.2 Notwithstanding the above, the funding agreement with the Home and Communities Agency and the European Regional Development Fund requires any profit generated by Blackpool Tower and the Winter Gardens to be spent on maintaining and improving the venues.

**4.8 Is reference to “theatres” and “maintenance of existing venues” necessary to the soundness of policy CS18 (see MM029)? If so would “retention” be a more appropriate word than “maintenance”?**

4.8.1 The references to ‘theatres’ and ‘maintenance of existing venues’ were proposed as a minor modification in response to a representation from the Theatres Trust. They are included to ensure the policy aligns with paragraph 70 of NPPF.

4.8.2 Para 70 of NPPF states that ‘to deliver the social, recreational and cultural facilities and services the community needs, planning policies should ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community’.

4.8.3 It is important to ensure that there is a certain level of flexibility to ensure the sustainable future of the Winter Gardens. The word ‘maintenance’ is considered to have more flexibility than ‘retention’. An example of taking a flexible approach is illustrated in proposals that have recently been put forward to re-use the Pavilion Theatre (a small theatre within the complex) for a Heritage Visitor Attraction. The theatre was under-utilised and had suffered structural issues and a severe lack of investment prior to the Council acquiring the Winter Gardens. Although the venue will no longer be retained as an operational theatre, the principle of this change has been supported by both the Theatres Trust and English Heritage.

#### **4.9 Does the plan provide adequate guidance on the “evening economy”?**

4.9.1 Policy CS17: Blackpool Town Centre provides the strategic policy framework for development in the Town Centre. It sets out the methods to re-establish the town centre as the first choice shopping destination for Fylde Coast residents and to strengthen it as a cultural, leisure and business destination for residents and visitors. Paragraph 7.4 of the supporting text recognises that to successfully position Blackpool Town Centre as the first choice shopping destination for Fylde Coast residents and an attractive place to visit and do business, the town centre needs to carve out a high quality retail offer and combine this with a wider positive leisure, cultural and social experience during the day and into the evening.

4.9.2 Directly linked to Policy CS17 is the adopted Town Centre Strategy (March 2013) (AD006) which provides the detailed supporting framework to this policy by identifying priorities for improvement and management of the town centre. It makes a number of references to the ‘evening economy’. A key objective of the strategy is to create a vibrant leisure, entertainment, cultural and business tourism destination for residents and visitors co-ordinating activity to develop the town centre evening economy. The accompanying Town Centre Action Plan at Appendix 1 sets out an action in relation to the evening economy. It states the priority to establish a working group to co-ordinate activity to stimulate the evening economy and footfall including new leisure uses and extended operating hours, alongside complementary car parking and event programme.

4.9.3 The Council’s recently published Destination Management Plan (2015-2017) (FEB004) is also relevant and sets out a plan for comprehensive marketing activity that promotes the ‘new Blackpool’ to existing, lapsed and new visitors. This includes working with partners to ensure a credible and sustainable night-time and early evening economy offer including the securing of ‘purple flag’ accreditation - a status for town centres that meet or surpass the standards of excellence in managing the evening and night-time economy.

4.9.4 Saved policy SR8 of the adopted Local Plan (which will continue to be saved) is also relevant to the night time economy and guides certain types of development within the identified ‘Leisure Zone’.

4.9.5 Taking all of the above into account, the plan and accompanying documents are considered to provide adequate guidance on the evening economy.

**4.10 Is policy CS19 (2b), which supports a major foodstore in the Central Business District, compatible with the statement in paragraph 5.53 that there is no overall need for further convenience goods floorspace in Blackpool to 2021 and very limited capacity to 2026?**

4.10.1 The major foodstore identified in policy CS19 (2b) has already been delivered in the form of a Sainsbury's superstore. This foodstore was acknowledged as an outstanding retail commitment within the 2011 Fylde Coast Retail Study (EB010) and was taken into account as a commitment when calculating the future supply of retail floorspace.

**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?**

4.11.1 It is not appropriate or 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. The policy is clear and sets out the uses that will be supported on the Leisure Quarter site. The aim of the policy is to deliver a major leisure development of national significance with complimentary uses, hotel development, ancillary retail, parking and service supported to add value and support the major leisure development. The 2011 Leisure Quarter Development Brief SPD (AD003) – page 27 provides further clarification on this matter in terms of the uses that the Council will support.