

# Public Document Pack

# Blackpool Council

27 July 2015

To: Councillors I Coleman, Critchley, Elmes, Hutton, Robertson BEM, Stansfield and L Williams

The above members are requested to attend the:

## PLANNING COMMITTEE

Tuesday, 4 August 2015 at 6.00 pm  
in Committee Room A, Town Hall, Blackpool

## A G E N D A

1a UPDATE NOTE

(Pages 1 - 26)

**Venue information:**

First floor meeting room (lift available), accessible toilets (ground floor), no-smoking building.

**Other information:**

For queries regarding this agenda please contact Bernadette Jarvis, Senior Democratic Governance Adviser, Tel: (01253) 477164, e-mail [chris.kelly@blackpool.gov.uk](mailto:chris.kelly@blackpool.gov.uk)

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Planning Committee:

4 Aug 2015
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## Planning Application Reports – Update Notes

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Listed below are changes to the planning reports made as a result of additional information received since the publication of the agenda for this meeting.

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Case: Year:	Address:	Update:
14/0608	Units 21-25 Squires Gate Industrial Estate, Squires Gate Lane	<p><b>Robert Pinkus &amp;Co</b> – a letter has been received from the firm regarding the Booths store on Highfield Road. This is appended to the update note</p> <p><b>Savills</b> – Further correspondence has been received regarding the Booths store on Highfield Road and the cumulative impact of the proposed store on the application site and the proposed store on the Westgate House site on the town centre and other centres. It includes a letter from Aldi. This is appended to the update note</p> <p><b>Hollis Vincent</b> – Further correspondence has been received in response to the publication of the Committee report. This includes a statement from Turner Lowe Associates on highway matters. This is appended to the update note</p> <p>This information is still being considered.</p> <p>However there are 2 issues which have been identified in relation to the Committee report –</p> <p>At the bottom of <b>page 46</b> of the report it should read ‘whilst 0.7 hectares would represent 2% of the future need if this is combined with the TVR site (0.86 hectares) this increases to 5%...@</p> <p>On <b>pages 38 and 51</b> of the Committee report reference is made to the proposal creating 84 jobs. I am seeking</p>

		clarification of this number given figures quoted for other Aldi stores.
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30 July 2015  
L 150730 SAV BBC Final Policy Response



Gary Johnston  
Planning and Transportation Division  
Blackpool Borough Council  
Municipal Buildings  
Corporation Street  
Blackpool  
FY1 1LZ

Savills  
DL: +44 (0) 161 277 7274  
F: +44 (0) 161 228 0544

Belvedere  
12 Booth Street  
Manchester M2 4AW  
T: +44 (0) 161 244 7700  
savills.com

Dear Gary

**THE TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
APPLICATION FOR THE DEMOLITION OF EXISTING COMMERCIAL FLOORSPACE AND ERECTION  
OF A NEW RETAIL UNIT (CLASS A1) AND ASSOCIATED PHYSICAL WORKS TO THE LAYOUT OF THE  
SITE AND ACCESS  
LAND ADJACENT TO BLACKPOOL RETAIL PARK, SQUIRES GATE LANE, BLACKPOOL, FY4 2RP  
LS RETAIL WAREHOUSING LIMITED  
APPLICATION REFERENCE: 14/0608**

**Introduction**

We write further to recent correspondence and discussions in respect of the above application which seeks planning permission for a new foodstore to be occupied by Aldi.

Further to our last conversation, the Report to the Planning Committee has now been published which recommends that the decision be delegated to the Head of Development Management.

The Report finds that the development is acceptable and accords with the relevant policies of the development plan subject to two, final points of clarification. These require the applicant to demonstrate that:

1. The cumulative impact of the extant planning permission for a foodstore at Westgate House (Ref: 14/0358) and the proposed development on Blackpool and other defined centres would not be 'significantly adverse'; and
2. The Booth's store on Highfield Road is not available, suitable and viable to accommodate the proposed development.

This correspondence provides a response to outstanding points listed above and demonstrates that it is appropriate for officers to recommend that the application be 'approved' by Members.

We would request that a summary of the additional evidence and the change to the formal recommendation is provided to Members via a formal written addendum in advance of the Committee meeting so it can be properly assessed.

## Outstanding Issues

### 1. Cumulative Impact

There is no locally set threshold for an assessment of impact and the threshold established in the NPPF is 2,500 sq. m. The proposed development measures just 1,740 sq. m (GEA) which equates to less than 70% of the minimum threshold.

The Committee Report therefore acknowledges that there is no requirement to undertake a formal assessment of impact.

In addition to the above, and as the Report to Committee sets out there is a quantitative need for 2,825 sq. m of net convenience goods retail floorspace<sup>1</sup>. The net sales area of the proposed store is 1,125 sq. m<sup>2</sup>. It follows that even taking into account the proposed development there remains a quantitative need for 1,700 sq. m of net convenience goods retail floorspace. This is sufficient to support the proposed store at Westgate House and additional floorspace should appropriate sites come forward.

As sufficient surplus expenditure capacity exists to support the committed floorspace and the proposed development, there is no requirement for unsustainable patterns of trade diversion.

Irrespective of the above, the applicant has completed an assessment to provide the Local Planning Authority ('LPA') with clear evidence that the proposal will not have an unacceptable impact. The assessment has now been updated to include the speculative development of a foodstore at Westgate House on Squires Gate Lane approved by Fylde Council and all other commitments.

The updated Statistical Tables setting out the economic assessment of the proposal are included at **Annex 1** of this letter. They are summarised below:

- **Table 1 – The turnover of the proposed Aldi store:** This is forecast to be £9.14m per annum in 2019<sup>3</sup>.
- **Table 2 – The performance of the existing stores:** Demonstrates that the out of centre convenience floorspace within Blackpool is overtrading by approximately £38.54m at 2014, and £36.36m at 2019. Within the town centre, the stores are overtrading by £2.75m at 2014 and £2.94m at 2019.
- **Table 3 – The forecast turnover of the commitments:** The principal commitments within the Catchment Area of the proposed store are the Sainsbury's<sup>4</sup> at Talbot Gateway, Aldi at Oxford Square and the proposed discount foodstore at the Baxter site on Squires Gate Lane in Fylde. The cumulative turnover of the three stores is estimated to be £60.56m by 2019.
- **Table 4 – The impact of commitments:** The impacts of all commitments are assessed to provide a cumulative figure and then a summary of the effect of the diversion on the performance of the store is included in the final columns. The analysis demonstrates that all of the stores continue to trade well above or commensurate with their company average.

It is important to note that the proposed Sainsbury's store will contribute towards the overall turnover and vitality and viability of Blackpool town centre and enhances its vitality and viability.

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<sup>1</sup> The figure is net (i.e. sales area), as set out at Table 4.2 of the Fylde Coast Retail Study 2013 Update.

<sup>2</sup> See Table 1 included at **Annex 1**.

<sup>3</sup> Five years from the date the application was made as required by the second bullet at Paragraph 26 of NPPF.

<sup>4</sup> Although Sainsbury's is now trading it is assumed to be a commitment as no survey data exists which establishes its trading patterns.

Furthermore, a benchmark turnover is not the same as a 'break even point' and stores continue to be profitable when trading below their company average.

- **Table 5 – The impact of the proposal:** The starting point for the assessment of the proposed development is the performance of existing stores after the impacts of the commitments has been assimilated. Table 5 represents a cumulative assessment of commitments and the proposed development.

The analysis demonstrates that the principal impact of the proposed development will be on other discount facilities and larger stores, the majority of which will be located outside Blackpool town centre. This accords with the established principle that 'like affects like'<sup>5</sup>.

Critically Table 5 demonstrates that the floorspace and stores within Blackpool town centre will continue to trade commensurate with company average level (90% of benchmark or above). The assessment therefore confirms that no in-centre store is anticipated to close as a result of the cumulative impacts and therefore there will be no material impact on turnover or choice. Accordingly, there is no evidence that the proposal will result in any significant adverse impacts on defined retail centres.

Although not a formal requirement of planning policy as acknowledged in the Report to Committee, the applicant has provided clear evidence to demonstrate:

- a. There is sufficient expenditure capacity to support the commitments and the proposed development so there is no requirement for unsustainable trade diversion from existing facilities; and
- b. Neither the solus impact of the proposed development or its cumulative impact when considered with commitments would trigger an unacceptable impact on Blackpool or any other defined centre.

## **2. Sequential Assessment of Booths, Highfield Road**

Our letter, dated 15 May 2015 (a copy enclosed at **Annex 2**), provides a detailed assessment of the premises currently occupied by Booths on Highfield Road. It sets out a number of reasons as to why that site is not suitable or viable to accommodate the proposed operation by Aldi.

To assist the assessment of the proposed development, below we provide further evidence to in respect of the following principal matters:

- a. Is the Booths site sequentially preferable to the application site?
- b. Is the site suitable and viable to accommodate the specific development proposed as part of the application?

These two matters are assessed below.

### **a. Is the Booths site a sequentially preferable location?**

Annex 2: Glossary of the NPPF confirms that 'for retail purposes', edge of centre is: 'a location that is well connected and up to 300 metres of the primary shopping area'.

As acknowledged in the Report to Committee, both sites are well within the maximum 300m distance.

The application site is well connected to St Annes Road Local Centre. There are dedicated footpaths and signalised pedestrian crossings that link the two destinations. It follows that there are no barriers that impede the ability for shoppers to easily walk between both locations and there is clear evidence of these linked trips on site.

<sup>5</sup> See Paragraph 010 of the NPPG (Reference ID: 2b-016-20140306).

The detailed assessment of both sites that has been carried out by the applicant demonstrates that:

- i. Both sites are well connected to their surrounding residential areas. There are dedicated footways and pedestrian crossings between both sites and surrounding residential areas;
- ii. Both sites are well connected to public transport links. The application site and Booths store are located within 150m of existing bus stops on Squires Gate Lane and Highfield Road respectively. The bus stops provide services that connect each destination with surrounding residential areas;
- iii. Both sites fall within the desirable walking distance of residential areas and public transport facilities. This is 400m as set out at Table 3.2 of the Institution of Highways & Transportation: Guidelines for Providing for Journeys on Foot.

Both sites are correctly defined as being 'edge of centre' pursuant to the NPPF.

The reference in the Report to Committee that the application site is 'out of centre' or 'on the edge of an out of centre' site are inaccurate. It follows that the Booths site is not sequentially preferable to the application site.

Although both sites are accessible by non-car modes of transport, it is important to have due regard to the specific role, function and characteristics of the proposed development. In this instance significant weight must be afforded to the following:

1. The established modes of transport used for 'main food' shopping in Blackpool; and
2. The objective to reduce overtrading of the existing Morrisons store.

These are addressed below.

The majority of main food shopping trips are undertaken as dedicated trips and using private vehicles.

The data from the household survey used to inform the Council's Retail Study demonstrates that **80%** of all shoppers undertake their main food shop by private modes of transport. 12% of shoppers walk to their preferred store and only 6% travel there by bus.

The application site is accessible by public and sustainable modes but commercial realism must be applied to decision making. The evidence is clear that the majority of users will visit the store by private modes.

As set out above, the application site will enable the proposed development to benefit from established shopping and travel patterns, enabling customers to link a trip with the adjacent Morrisons store and the wider Retail Park. Being located adjacent to the Morrisons store is particularly relevant as the majority of customers will use both stores to meet their shopping requirements. This reflects the emerging shopping patterns in the UK which show an increasing consumer preference to shop at both main grocers and discount stores to meet their requirements.

If the proposed Aldi store was to be accommodated at the Booths site it would trigger a greater number of trips and distance travelled by private vehicles as customers visit the separate sites.

By creating genuine opportunities for customers to link trips with the adjoining retail facilities, the proposed development will reduce the distance travelled in private modes of transport. The proposed development therefore accords with the overarching objective to deliver sustainable forms of development.

**b. Is the Booths site available, suitable and viable to accommodate the proposed development?**

For the reasons set out above, an assessment of the Booths site is not formally required as it is not sequentially preferable to the application site.



A detailed assessment of the site has however been undertaken in the interests of completeness. This is set out in the correspondence at **Annex 2**. That assessment is supplemented with additional information below. The premises remains operational but we understand from the letting agent that Booths will vacate the premises in September so it is considered 'available'. The agent has confirmed that there has already been expressions of interest for the unit but no formal offers have been made.

The Council will be aware that the sequential test should be proportionate and appropriate for the given proposal<sup>6</sup>, and applied according to the market requirements that a proposal is intended to serve.

As set out in the **Annex 2**, the Booths store is located at the very edge of the Catchment Area of the proposed store. Its location means it would not meet the same consumer demand as the proposed store. The proposed store is intended to serve:

- i. the residential population around St Annes Road and Squires Gate Lane;
- ii. the holiday accommodation to the west of the site;
- iii. the overtrading at the existing Morrisons store adjacent to the application site; and
- iv. other customers visiting the wider Retail Park that reside outside the immediate catchment area of the store.

Critically a store at the Booths site would compete directly with the existing Aldi store at Waterloo Road and to a greater degree the proposed store at Oxford Road Local Centre. The store would result in the cannibalisation of the trade to those two stores and is not a commercially realistic option for the Company.

The cannibalisation of trade is compounded by the anticipated lower turnover of a store trading from the Booths site. The existing operator is closing the store as it does not meet its financial expectations. This is confirmed by the data from the Retail Study demonstrates that the store is trading below its anticipated benchmark level.

Aldi is committed to investing in Blackpool and wants to open another store to complete its coverage in the south of the town. The Booths site does not provide a commercially realistic option given the location of its existing and proposed stores. Planning policy and the binding authorities on its interpretation are explicit that for an alternative site to be sequentially preferable it must be realistic to accommodate the proposal.

The Booths site is not suitable or viable to accommodate the proposed development. Aldi has already considered the site as an option and dismissed it for a series of legitimate commercial reasons. Should planning permission not be granted for the proposed development, Aldi cannot and will not occupy the floorspace at the Booths site and this is a material consideration for the LPA. A refusal to grant planning permission will not result in the reoccupation of the Booths unit by the proposed operator.

## Summary and Conclusion

As part of this correspondence the applicant has responded to the two outstanding matters identified in the Report to Committee and demonstrated that:

1. The cumulative impact of the commitments and the proposed development will not trigger a 'significant adverse impact' on Blackpool or any other defined centre;
2. The Booths site is not sequentially preferable to the application site; and
3. Even if the Booths site was deemed to be sequentially preferable, it is not suitable or viable to accommodate the proposed development. Aldi cannot operate its established business model from that premises.

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<sup>6</sup> The first sub-paragraph under Paragraph 010 of the section Ensuring the vitality of town centres in the National Planning Practice Guidance (The Guidance) and titled *How should the sequential test be used in decision-taking?* All paragraph references in the Statement in relation to The Guidance are from the section Ensuring the vitality of town centres, unless stated otherwise.

We trust that the LPA is now in a position to confirm that the proposed development accords with the development plan and all other material considerations.

In light of the additional evidence that has been provided, we would request that officers provide a formal written update to Members in advance of the Committee meeting confirming that:

1. The outstanding matters have now been fully addressed by the applicant and the development accords with the development plan and all other material considerations; and
2. Update the recommendation to from 'Delegate to Head of Development Management' to 'Approve subject to conditions'.

We would be grateful if you could confirm by return that your recommendation has been amended to reflect the evidence provided to the Council.

If you require any additional clarification in respect of any of the matters raised above, please do not hesitate to contact us. .

Yours sincerely

A handwritten signature in dark ink, appearing to read "Savills", written in a cursive style.

**Savills**  
Retail Planning

cc. I Bramley – Land Securities

### Appendix 3

LS Retail Warehousing Ltd  
Erection of a Discount Foodstore, Measuring 1,685 sq.m  
Blackpool Retail Park, Squires Gate Lane, Blackpool

Table 1 - Convenience Turnover of Proposed Floorspace

Scheme	Total Proposed Floorspace (GIA) (sq.m)	Net Sales Area (sq. m)	Sales Density (£/sq.m)	2014	2019
Aldi: Blackpool Retail Park	1,655	1,125	7,965	8.96	9.14

#### NOTES

Net sales area assumed to be 68% of GIA (figure provided by the retailer)

Sales Density is provided by the retailer

Floorspace efficiency rate of 0.4% (Pitney Bowes Expenditure Guide 2013/2014)

LS Retail Warehousing Ltd  
Erection of a Discount Foodstore, Measuring 1,685 sq.m  
Blackpool Retail Park, Squires Gate Lane, Blackpool

Table 2 - Summary of Over/Undertrading

Site	Net Convenience Sales Area (sq.m)	Sales Density 2013	Benchmark Convenience Turnover		Survey Derived Convenience Turnover		Difference Between Total Turnover (survey based) Total Turnover (anticipated) at 2019	Total Turnover (survey based) as a % of Total Turnover (anticipated)
			2014	2019	2014	2019		
<b>In Centre Stores</b>								
<b>Blackpool Town Centre Stores</b>								
<i>Iceland, Topping Street, Blackpool</i>	590	6,846	4.06	4.14	6.39	6.54	2.40	158%
<i>Marks and Spencer, Church St, Blackpool</i>	750	11,797	8.88	9.06	4.14	4.24	-4.83	47%
<i>Other Stores, Blackpool town centre</i>	7,090	2,500	17.80	18.15	22.96	23.52	5.36	130%
<b>Blackpool Town Centre Total</b>	<b>8,430</b>	<b>-</b>	<b>30.73</b>	<b>31.35</b>	<b>33.48</b>	<b>34.30</b>	<b>2.94</b>	<b>109%</b>
<b>St Annes Town Centre</b>								
<i>Marks and Spencer, St Annes</i>	493	11,797	5.84	5.96	4.24	4.34	-1.62	73%
<i>Sainsbury's, Clifton Drive South, St Annes</i>	1,871	12,183	22.89	23.35	23.87	24.44	1.10	105%
<i>Other Stores, St Annes</i>	2,976	2,500	7.47	7.62	7.75	7.94	0.32	104%
<b>St Annes Town Centre Total</b>	<b>5,340</b>	<b>-</b>	<b>36.19</b>	<b>36.92</b>	<b>35.85</b>	<b>36.72</b>	<b>-0.20</b>	<b>99%</b>
<b>Out of Centre Stores</b>								
<i>Tesco, Clifton Retail Park, Blackpool</i>	4,181	11,049	46.38	47.32	59.38	59.61	12.30	126%
<i>Asda, Cherry Tree Road, Blackpool</i>	3,227	12,873	41.71	42.55	43.41	43.59	1.04	102%
<i>Booths, Highfield Road, Blackpool</i>	950	9,957	9.50	9.69	9.02	9.05	-0.64	93%
<i>Aldi, Waterloo Road, Blackpool</i>	962	6,932	6.70	6.83	8.13	8.16	1.33	120%
<i>Lidl, Bloomfield Road</i>	846	3,808	3.23	3.30	4.58	4.60	1.30	139%
<i>Morrisons, Blackpool Retail Park, Blackpool</i>	2,786	13,162	36.82	37.56	58.35	58.59	21.03	156%
<b>Out of Centre Stores Total</b>	<b>12,952</b>	<b>-</b>	<b>144.33</b>	<b>147.24</b>	<b>182.87</b>	<b>183.60</b>	<b>36.36</b>	<b>125%</b>
<b>Other Stores</b>								
<b>TOTAL</b>	<b>26,722</b>		<b>211.26</b>	<b>215.52</b>	<b>252.20</b>	<b>254.62</b>	<b>39.10</b>	<b>118%</b>

NOTES

Net convenience sales areas taken from the FCRS

Average Sales densities are sourced from Appendix 2, Table 5 of the Lancaster Retail Strategy January 2014, produced by WYG and then converted to 2012 price base. The sales densities are stated by WYG to be derived from Verdict 2013

Average sales density for town centre retailers is a Savills estimate based on local knowledge and typical town centre convenience retailers

Benchmark convenience turnovers derived by calculating the net convenience sales area by the sales density and grown at 0.4% each year (Pitney Bowes Expenditure Guide 2013/2014)

Survey Derived Convenience Turnovers taken from Spreadsheet 12 of the FCRS Update 2013

Difference in benchmark and survey derived calculated by deducting the survey derived from the benchmark

**LS Retail Warehousing Ltd**  
**Erection of a Discount Foodstore, Measuring 1,685 sq.m**  
**Blackpool Retail Park, Squires Gate Lane, Blackpool**

**Table 3 - Convenience Turnover of Commitments**

<b>Commitment / Scheme</b>	<b>Total Proposed Floorspace (sq.m)</b>	<b>Net Convenience Sales Area (sq. m)</b>	<b>Sales Density (£/sq.m)</b>	<b>2014</b>	<b>2019</b>
1. Sainsbury's, Talbot Gateway, Blackpool	8,710	3,680	11,816	43.48	44.36
2. Aldi, Oxford Square, Blackpool	1,647	1,125	7,965	8.96	9.14
3. Baxter Site, Squires Gate Lane	-	894	7,737	6.92	7.06
<b>Total</b>	<b>10,357</b>	<b>4,805</b>		<b>59.36</b>	<b>60.56</b>

**NOTES**

Net sales area for Sainsbury's taken from the application documents in support of the application

Net sales area for Aldi assumed to be 68% of GIA (figure provided by the retailer)

All data for the Westgate House Site Taken from the Hollis Vincent Retail Impact Assessment for the application submitted to Fylde

Sales Density is provided by the retailer

Estimated turnover of the Sainsbury's is taken from the How Planning Retail Statement - Table 9b of Appendix 9 - 'Economic Tables'

Floorspace efficiency rate of 0.4% (Pitney Bowes Expenditure Guide 2013/2014)

Table 4 - Anticipated Convenience Trade Diversion of Commitments

Site	Survey Derived Turnover		Benchmark Turnover	Estimated Trade Diversion to Commitment 1 at 2014 (%)	Estimated Trade Diversion to Commitment 1 at 2019 (%)	Trade Diversion to Commitment 1 (£m)		Total Impact of Commitment 1 (%)		Residual Turnover after Commitment 1 (£m)		Estimated Trade Diversion to Commitment 2 at 2014 (%)	Estimated Trade Diversion to Commitment 2 at 2019 (%)	Trade Diversion to Commitment 2 (£m)		Residual Turnover after Commitments 1 and 2 (£m)		Estimated Trade Diversion to Commitment 3 at 2014 (%)	Estimated Trade Diversion to Commitment 3 at 2019 (%)	Trade Diversion to Commitment 3 (£m)		Residual Turnover after Commitments 1 - 3 (£m)		New Difference Between Survey and Expected Contribution	Turnover as a % of Benchmark after Development	
	2014	2019	2019			2014	2019	2014	2019	2014	2019			2014	2019	2014	2019			2014	2019	2014	2019			
					43.48	44.36							8.96	9.14					6.92	6.94						
<b>In Centre Stores</b>																										
Blackpool Town Centre	33.48	34.16	31.35	10.0%	10.0%	4.35	4.44	12.99	12.99	29.14	29.18	5.0%	5.0%	0.45	0.46	28.69	28.72	3.7%	3.7%	0.33	0.34	28.36	28.39	-2.97	91%	
<i>Commitment 1 - Proposed Sainsbury's (Talbot Gateway)</i>	<i>43.48</i>	<i>44.36</i>	-	-	-	-	-	-	-	-	-	5.0%	5.0%	0.45	0.46	43.03	43.90	0.0%	0.0%	0.00	0.00	43.03	43.90	-	-	
<b>Blackpool Town Centre Total</b>	<b>76.97</b>	<b>78.52</b>				<b>4.35</b>	<b>4.44</b>	<b>12.99</b>	<b>12.99</b>	<b>29.14</b>	<b>29.18</b>	<b>10.0%</b>	<b>10.0%</b>	<b>0.90</b>	<b>0.91</b>	<b>71.72</b>	<b>72.63</b>	<b>3.7%</b>	<b>3.7%</b>	<b>0.33</b>	<b>0.34</b>	<b>71.39</b>	<b>72.29</b>			
St Annes Town Centre	35.85	36.72	36.92	2.5%	2.5%	1.09	1.11	3.0	3.0	34.8	35.6	0.0%	0.0%	0.00	0.00	35.85	36.72	9.1%	9.1%	0.82	0.83	35.04	35.89	-1.03	97%	
<i>Commitment 2 - Proposed Aldi, Oxford Square</i>	<i>8.96</i>	<i>9.14</i>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
<b>Out of Centre Stores</b>																										
Tesco, Clifton Retail Park, Blackpool	59.38	60.57	47.32	15.0%	15.0%	6.52	6.65	11.0	11.0	52.9	53.0	15.0%	15.0%	1.34	1.37	51.51	51.59	9.9%	9.9%	0.89	0.90	50.62	50.68	3.37	107%	
Asda, Cherry Tree Road, Blackpool	43.41	44.29	42.55	15.0%	15.0%	6.52	6.65	15.1	15.1	36.9	36.9	15.0%	15.0%	1.34	1.37	35.55	35.56	13.8%	13.8%	1.24	1.26	34.31	34.30	-8.25	81%	
Booths, Highfield Road, Blackpool	9.02	9.20	9.69	2.5%	2.5%	1.09	1.11	12.1	12.1	7.9	7.9	0.0%	0.0%	0.00	0.00	7.93	7.94	5.0%	5.0%	0.45	0.46	7.48	7.49	-2.20	77%	
Aldi, Waterloo Road, Blackpool	8.13	8.30	6.83	0.0%	0.0%	0.00	0.00	0.0	0.0	8.1	8.2	5.0%	5.0%	0.45	0.46	7.68	7.71	4.9%	4.9%	0.44	0.45	7.25	7.26	0.43	106%	
Lidl, Bloomfield Road	4.58	4.67	3.30	0.0%	0.0%	0.00	0.00	0.0	0.0	4.6	4.6	5.0%	5.0%	0.45	0.46	4.13	4.14	0.9%	0.9%	0.08	0.08	4.05	4.06	0.76	123%	
Morrisons, Blackpool Retail Park, Blackpool	58.35	59.53	37.56	20.0%	20.0%	8.70	8.87	15.0	15.0	49.7	49.7	10.0%	10.0%	0.90	0.91	48.76	48.80	34.8%	34.8%	3.12	3.18	45.64	45.62	8.06	121%	
Other Stores	-	-	-	35.0%	35.0%	15.22	15.53	-	-	-	-	30.0%	30.0%	2.69	2.74	-	-	14.2%	14.2%	1.27	1.30	-	-			
<b>TOTAL</b>	<b>381.61</b>	<b>389.31</b>		<b>100.0%</b>	<b>100.0%</b>	<b>32.61</b>	<b>33.27</b>			<b>0.00</b>		<b>100.0%</b>	<b>100.0%</b>	<b>8.96</b>	<b>9.14</b>			<b>100.0%</b>	<b>100.0%</b>	<b>8.96</b>	<b>9.14</b>					

NOTES  
 Convenience goods turnover taken from the 2013 Fyde Coast Retail Study Update  
 Turnovers assume a 0.4% floorspace efficiency  
 Trade draw percentages are a Savills' average, based on local knowledge and locations of the destinations  
 Trade draw for the Westgate House Site Taken from the Hollis Vincent Retail Impact Assessment for the application submitted to Fyde

LS Retail Warehousing Ltd  
Erection of a Discount Foodstore, Measuring 1,685 sq.m  
Blackpool Retail Park, Squires Gate Lane, Blackpool

Table 5 - Anticipated Convenience Trade Diversion of Proposal following Commitments

Site	Survey Derived Turnover Post Commitments		Expected Benchmark Turnover	Estimated Trade Diversion to Proposal at 2014 (%)	Estimated Trade Diversion to Proposal at 2019 (%)	Trade Diversion to Proposal (£m)		Residual Turnover after Proposal (£m)		Cumulative Trade Diversion of Proposal and Commitments (£m)		New Difference Between Survey and Expected Contribution	Turnover as a % of Benchmark after Development
	2014	2019				2019	2014	2019	2014	2019	2014		
					8.96	9.14							
<b>In Centre Stores</b>													
Blackpool Town Centre	28.36	28.39	31.35	2.5%	2.5%	0.22	0.23	28.13	28.16	5.02	5.12	-3.20	90%
<b>Commitment 1 - Proposed Sainsbury's (Talbot Gateway)</b>	43.03	43.90	44.36	5.0%	5.0%	0.45	0.46	42.59	43.45	0.90	0.91	-0.91	98%
<b>Blackpool Town Centre Total</b>	<b>71.39</b>	<b>72.29</b>	<b>75.71</b>	-	-	<b>0.67</b>	<b>0.69</b>	<b>70.72</b>	<b>71.60</b>	<b>5.92</b>	<b>6.04</b>	<b>-4.11</b>	<b>95%</b>
St Annes Town Centre	35.04	35.89	36.92	2.5%	2.5%	0.22	0.23	34.81	35.66	1.31	1.34	-1.26	97%
<b>Commitment 2 - Proposed Aldi, Oxford Square</b>	8.96	9.14	-	7.5%	7.5%	0.67	0.69	8.29	8.46	0.67	0.69	-	-
<b>Out of Centre Stores</b>													
Tesco, Clifton Retail Park, Blackpool	50.62	50.68	47.32	15.0%	15.0%	1.34	1.37	49.28	49.31	9.21	9.40	2.00	104%
Asda, Cherry Tree Road, Blackpool	34.31	34.30	42.55	15.0%	15.0%	1.34	1.37	32.97	32.93	9.21	9.40	-9.62	77%
Booths, Highfield Road, Blackpool	7.48	7.49	9.69	0.0%	0.0%	0.00	0.00	7.48	7.49	1.09	1.11	-2.20	77%
Aldi, Waterloo Road, Blackpool	7.25	7.26	6.83	7.5%	7.5%	0.67	0.69	6.57	6.57	1.12	1.14	-0.26	96%
Lidl, Bloomfield Road	4.05	4.06	3.30	2.5%	2.5%	0.22	0.23	3.83	3.83	0.67	0.69	0.53	116%
Morrisons, Blackpool Retail Park, Blackpool	45.64	45.62	37.56	30.0%	30.0%	2.69	2.74	42.95	42.88	12.28	12.53	5.32	114%
	149.35	149.41	147.24										
Other Stores	-	-		12.5%	12.5%	1.12	1.14	-	-	-	-	-	-
<b>TOTAL</b>	<b>264.74</b>	<b>266.73</b>		<b>100.0%</b>	<b>100.0%</b>	<b>7.84</b>	<b>8.00</b>	<b>256.90</b>	<b>258.73</b>	<b>41.48</b>	<b>42.32</b>		

NOTES

Convenience goods turnover taken from the 2013 Fylde Coast Retail Study Update

Turnovers assume a 0.4% floorspace efficiency

Trade draw percentages are a Savills' average, based on local knowledge and locations of the destinations

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CHARTERED SURVEYORS  
COMMERCIAL PROPERTY CONSULTANTS

16 – 18 RIVERSWAY BUSINESS VILLAGE  
NAVIGATION WAY PRESTON PR2 2YP  
TEL: 01772 769000  
FAX: 01772 760066  
WEBSITE: [www.pinkus.co.uk](http://www.pinkus.co.uk)

Gary Johnston  
Head of Development Management  
Development Management Section  
Blackpool Council  
PO Box 17  
Corporation Street  
Blackpool, FY1 1 LZ

Sent via email & post: [Gary.Johnston@blackpool.gov.uk](mailto:Gary.Johnston@blackpool.gov.uk)

Ref: RDP/NB

30<sup>th</sup> July 2015

Dear Mr Johnston,

**Re: Planning Application Reference: 14/0608 - Squires Gate, Blackpool**

I write on behalf of our clients E H Booth & Co. Ltd. in connection with the above application which I understand is due to be heard on Tuesday 4<sup>th</sup> August.

I have read the committee report and note that uncertainty is indicated as to whether our client's existing foodstore at Highfield Road Blackpool is available for disposal.

I wish to make it clear that our clients will shortly be relocating to a new store, which is nearing completion, at Heyhouses Lane, St Annes and that marketing has now commenced for the disposal of the existing store, which our clients are willing to dispose of either by way of a sale of the existing building or as a redevelopment site.

We consider that the site is ideally located for a discount food operation and our marketing is being targeted to that end.

I trust that this clarifies the situation and would be grateful if you would bring this letter to the attention of your planning committee.



Most Active Agent  
Lancashire & Cumbria  
Deals Winner or Runner Up  
2009-2015

R D PINKUS BSc  
G ASSALONE DipArb FRICS MCI Arb IRRV (Hons)  
D PINKUS MRICS

ROBERT PINKUS & CO. IS A TRADING NAME OF ROBERT PINKUS & CO LLP WHICH IS A LIMITED LIABILITY PARTNERSHIP REGISTERED IN ENGLAND AND WALES UNDER PARTNERSHIP NUMBER: 0C357286 AND HAVING A REGISTERED OFFICE ADDRESS OF 69 MIDDLETON ROAD, CRUMPSALL, MANCHESTER, M8 4JY



I plan to attend the meeting and have registered to speak in case it is necessary to clarify our client's position, and trust that this is in order.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Robert Pinkus", is centered below the text "Yours sincerely,".

Robert Pinkus  
rob@pinkus.co.uk

CC: Graham Booth, John Lowe

**Proposed Discount Foodstore  
Squires Gate Industrial Estate  
Highways Objection**

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**Proposed Discount Foodstore  
Squires Gate Industrial Estate  
Highways Objection**

**1. Introduction**

- 1.1 In December 2014 a Supplementary Note was prepared as part of a planning application for a Discount Foodstore on the site of Westgate House, on Westgate Road, off Squires Gate Lane, in Fylde.
- 1.2 That Supplementary Note provided a comparison of the accessibility of the Westgate House site with the site of a proposed Discount Foodstore on the Squires Gate Lane Industrial Estate being promoted as a development on the adjacent Retail Park (which it is not).
- 1.3 The Note also identified that whilst the applicants claimed that the development would be sustainable and would encourage alternative modes of travel for staff and customers, the scheme proposed 30 reserved parking spaces for staff, which with around 30 staff in total being on duty in a Discount Foodstore of this size at any time would be a space for every member of staff, even though a high percentage of the workforce of such stores usually walk to work or use public transport. This was hardly likely to encourage alternative mode use.
- 1.4 The Note also identified that the scheme proposed a link from the existing Retail Park car park onto the Industrial Estate access road. No proposals to control the use of this link were proposed. This was clearly intended to be a second access to the Retail Park car park, presumably intended to relieve congestion at busy times within the car park. There would be no benefit to general highway users arising from this link and regardless of the likely use of the link road, its use had not been assessed.
- 1.5 The Note was copied to Blackpool Council, as part of an objection to the Retail Park Discount Foodstore, under cover of hollissvincent's letter of 15 July 2015.

**2. Additional Information**

- 2.1 At the time of preparation of the previous Supplementary Note, the Blackpool Highways Department had responded in November 2014 on the application advising that its supporting information was inadequate and there was, therefore, a highways objection to the application.
- 2.2 We now see that additional information was submitted to the highways department in December 2014 which was commented on in Mr Patel's email to Mr Johnston of

**Proposed Discount Foodstore  
Squires Gate Industrial Estate  
Highways Objection**

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3<sup>rd</sup> February 2015. This additional information has not been made available to anyone that may have an interest in the scheme and cannot, therefore, be commented on. This makes a mockery of the public consultation process.

- 2.3 The comments made on this additional information, plus amended drawings, show that the previously indicated 30 staff parking spaces are now to be available to the general public and there is to be no control of the link from the Retail Car Park to the Industrial Estate.
- 2.4 Our previous assumption that this was just a thinly veiled attempt at providing a second access to the retail park has been confirmed.
- 2.5 It would seem that this additional information still did not provide any assessment of the effects the development would have on key junctions, and the highways response of 3<sup>rd</sup> February 2015 still maintained an objection to the scheme.
- 2.6 Nothing has been added to the public access planning file since February 2015 other than our client's objection to the development. The Committee Report, however, refers to discussions having taken place which has now resulted in there being no Highways Objection to the scheme.
- 2.7 These discussions must have involved the submission of more information yet nothing has been made available to parties that have an interest in the scheme and the effects it could have on free-flow of traffic into Blackpool. We consider this to be unreasonable.
- 2.8 Furthermore, it can be assumed that there has still been no assessment of the effects of the scheme on key junctions, this apparently being because it would have involved the assessment of two junctions!
- 2.9 We would have thought that even if it was considered that the public should not be advised of this information and given the opportunity to comment on it, the Members could be expected to ask the simple question?

“How with this scheme affect traffic on Squires Gate Lane?”

The answer from the Highways Department could be nothing other than:

“We don't know”

- 2.10 All the traffic generated by the foodstore could use the existing Retail Park junction. All the traffic generated by the foodstore plus all the traffic generated by the Retail Park could use the Industrial Estate access. In reality the real situation would be somewhere in-between but without assessing the effects of this situation,

**Proposed Discount Foodstore  
Squires Gate Industrial Estate  
Highways Objection**

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with sensitivity tests looking at the worst cases, it cannot be said that the effects of the development have been assessed and it has been demonstrated that the development will not have an effect on traffic conditions in the area.

2.11 It is unreasonable that an application should be considered without this basic information being provided and all the work being available for comment by interested parties.

**3. Conclusions**

3.1 It is clear that the proposed development is no more than the expansion of the Retail Park into the designated Employment Area, and the creation of an additional access that can be used by all visitors to the Retail Park, with no incentives to use alternative modes of travel.

3.2 The application is completely contrary to the policies of the Planning Authority.

3.3 The process by which additional information has been submitted but not made available to interested parties to comment on is not reasonable.

J Lowe  
Partner  
Turner Lowe Associates  
31 July 2015

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Delivered by e-mail

31 July 2015

Gary Johnston  
Planning and Transportation Division  
Blackpool Borough Council  
Municipal Buildings  
Corporation Street  
Blackpool  
FY1 1LZ

Dear Mr Johnston,

**Re: Application Reference 14/0608: Redevelopment of Units 21 to 25 at Squires Gate Industrial Estate**

We write on behalf of the Baxter Group Limited to provide a supplementary representation in respect of the above planning application submitted by LS Retail Warehousing Limited.

At the outset, we would like to thank you for summarising our objection letter of 15 July 2015 and for appending it to your report to committee.

We note that you are recommending that Members defer the application for your determination, pending the receipt of further information from the applicant's agent in relation to the imminent availability of the Booths store in a sequentially preferable location on Highfield Road, and in relation to the requirement for an assessment of cumulative impact, so as to take into account of our client's extant permission for a foodstore at Westgate House (Fylde Council ref: 14/0358). However, notwithstanding the need for this further information, we are somewhat surprised that your report does not give Members more of a steer towards refusal.

You accept that the application at the Squires Gate Industrial Estate represents a departure from the provisions of the adopted Blackpool Local Plan (Policies DE1 and DE2 in particular) and that the proposal is also in conflict with the provisions of the emerging Core Strategy (Policies CS3, CS4 and CS23), which you suggest, correctly in our view, should be given considerable weight in decision taking, following the completion of the Examination. In these circumstances, Section 38(6) on the Planning and Compulsory Purchase Act 2004 requires a refusal, unless material consideration indicate otherwise.

Moreover, Paragraphs 2, 11, 12, 196 and 210 of the NPPF reinforce the provisions on Section 38(6) and it is clear that the application does not benefit from the presumption in favour of sustainable development set out in Paragraph 14 of the NPPF; this is because the Development Plan is not absent or silent and relevant policies, particularly in relation to employment land, are not out of date in light of the findings of the Council's Employment Land Study issued in June 2014, which formed part of the evidence base to the emerging Core Strategy.

Your report suggests very few material considerations in support of the application proposal. You make reference to the potential for linked trips with the Morrisons store and with other retailers at the Squires Gate Retail Park, but most of the visitors to these stores are car borne and the linkage reinforces the attractiveness of an out-of-centre location to the detriment of nearby Town Centres. This is one of the reasons why the provisions of Paragraph 1.17 of the long since revoked Revised PPG6 of June 1996 were not reflected in the subsequent policy provided in PPS6, PPS4 or, most importantly, in Paragraph 24 of the NPPF. You also make reference to the applicant's argument that its proposal would meet the three strands of sustainable development, but in our assessment, this cannot be accepted because:

- the gross job estimate provided by Savills is greatly exaggerated and Turley and WYG who both work for Aldi on a regular basis suggest a gross job generation for such a store of just 40 persons, which is represents 30 full time equivalents;
- the social benefits provided by the qualitative addition to the retail offer are limited because our client's planning permission will already provide for these benefits and there is no qualitative need for two discount foodstores in such close proximity; and
- the alleged environmental benefits associated with linked trips are false because the accessibility to the Squires Gate Industrial Estate application site by foot, bicycle and public transport is so inadequate and most of the new visitors would be car borne.

Indeed, your report correctly identifies a number of important adverse impacts associated with the application proposal which clearly outweigh the limited benefits that you and/or the applicant identifies. These adverse impacts include the loss of 0.7 hectares of employment land, which, together with the 0.86 hectares being lost at the TVR site, is 5 per cent of the 31.5 hectare requirement (not 0.05 per cent as stated in your report, inadvertently of course). This loss in itself must be regarded as serious in the context of an acknowledged shortfall of employment land of approximately 14 hectares, for which Blackpool is reliant on Fylde. Furthermore, as you acknowledge, the existing premises have '*...not been the subject of a bespoke marketing exercise...*' and '*...there is no evidence that should the units be demolished the land could not be redeveloped for industrial purposes...*', particularly given the stimulus that will arise from the Enterprise Zone which will become operational in January 2016. Thus, it has not been demonstrated, in the words of Paragraph 22 of the NPPF, that '*...there is no reasonable prospect of a site being used for that purpose*'. Moreover, the applicant acknowledges that its proposal does not represent enabling development of the sort envisaged in the explanatory wording to Policies CS3 and CS24 of the emerging Core Strategy.

The issue is not just about whether the application would prejudice redevelopment of the remainder of the Squires Gate Industrial Estate, or whether it would set a precedent, important though these matters are; the loss of 0.7 hectares itself is unacceptable and unnecessary in the specific circumstances faced by Blackpool.



So far as the second limb of our objection is concerned, it is quite clear from your report that there is a failure of the sequential test (even without allowing for the opportunity of the soon to be vacated Booths site on Highfield Road) because within the terms of the tests set out in Paragraph 24 of the NPPF, it is clear that our client's site at Westgate House is far more accessible by a range of modes of transport and much better connected by bus to the nearby Town Centres. Thus, we note, and agree with, your observations that:

- the application site is 320m walk from the nearest bus stops in St Anne's Road (except for service number 688 on the southern side of Squires Gate Lane);
- *'...the application site could hardly be described as well connected to the Local Centre.'*, particularly given its separation from St Anne's Local Centre by a busy dual carriageway;
- *'...the southern half of the catchment area for the proposed store is largely employment or airport land and hence there is not a large residential hinterland south of the application site within easy walking distance of the site';*
- there are limited pedestrian crossing points and limited bus stops in the vicinity of the application site; and that
- *'...the Westgate House site has a frontage to Squires Gate Lane, it has a more immediate residential catchment (properties in Westgate Road), there is bus stop in front of the Westgate House site and bus stops on Lytham Road and more services linking the Westgate House site to St Annes and Blackpool Town Centres.'*

Indeed, the only disadvantage that you perceive in relation to the Westgate House site is that it would not benefit from linked trips to the same extent as the application site at Squires Gate Lane. However, as previously explained, this linkage, in an out-of-centre location, is not necessary a benefit, particularly in the case of Squires Gate Lane which is so inaccessible by any means of transport other than the car.

### **Conclusion**

In conclusion, therefore, it is clear that Section 38(6) requires a refusal, as does Paragraph 27 of the NPPF. The questionable benefits that you and/or the applicant identify are more than offset by the harm caused by the conflict with the development plan and the failure of the sequential test. There is also the issue of cumulative impact which has not yet been addressed by the applicant which may unearth a further reason for refusal.

Thus, even without the further information required in respect of the Booths site on Highfield Road and in relation to cumulative impact, there is already sufficient evidence to make it clear to your Members that the application should be refused.

### **Highways Objection**

Finally, we refer to a Highways Objection, prepared on behalf of the Baxter Group by Turner Lowe Associates, which is attached to this letter. In essence, Turner Lowe Associates is concerned that:

- a) there does not appear to be any information on the public file to explain why Mr Patel's objections to the proposal set out in his memo of 13<sup>th</sup> December 2014 and his email to you of 3<sup>rd</sup> February 2015 appear to be overcome, given that your report states that the Head of Transportation has *'no objections in principle'*; and that
- b) there is no robust analysis to assess how the planning application proposal is likely to affect traffic on Squires Gate Lane.

We shall be grateful, once again, therefore, if you can summarise this further representation in your presentation to Members and make copies of the representation and attachment available to them.

Yours sincerely,

A handwritten signature in blue ink, consisting of several overlapping, slanted strokes that form a stylized 'M' and 'H'.

Mike Holliss

Enc: Highways Objection prepared by Turner Lowe Associates

**PLANNING COMMITTEE  
4 AUGUST 2015 – ORDER OF BUSINESS**

APPLICATION No/Recommendation	DESCRIPTION	ORDER OF BUSINESS	DETAILS
<b>Agenda Item 5</b>  <b>14/0608</b>  <b>Officer's recommend: Defer for delegation to the Head of Development Management</b>  <b>Page 37</b>	Erection of single storey retail food store (Use Class A1) with main pedestrian access from the Blackpool Retail Park, creation of vehicular access through from the Blackpool Retail Park to the Squires Gate Lane Industrial Estate, creation of 44 car parking spaces and associated servicing area and landscaping, following demolition of existing buildings.  <b>UNITS 21-25 SQUIRES GATE INDUSTRIAL ESTATE, SQUIRES GATE LANE, BLACKPOOL</b>	<b>INFORMATION FROM OFFICERS</b>	
		<b>OBJECTORS</b>	Mr Robert Pinkus (Agent)
		<b>APPLICANT/AGENT/SUPPORTER</b>	Mr Tim Price (Agent)
		<b>WARD COUNCILLOR</b>	
		<ul style="list-style-type: none"> <li>• <b>DEBATE BY COMMITTEE</b></li> <li>• <b>DECISION</b></li> </ul>	

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