

Thresholds for Impact Assessment for Blackpool Town Centre and the District Centres

1. In accordance with the requirements of paragraph 26 of NPPF, it is appropriate for the Local Planning Authority (LPA) to identify thresholds for the scale of edge of centre and out of centre retail, leisure and office development which should be the subject of an impact assessment which accompanies a planning application. If an LPA does not set a local threshold the default threshold in NPPF is 2,500sqm for such assessments.
2. Based on the findings of the Study and the recommendations to protect Blackpool Town Centre from trade diversion and further shifts in shopping patterns to out of centre floorspace, it is recommended that a lower threshold of 500sqm should be applied to Blackpool Town Centre.
3. Given the nature of the district centres, WYG also recommended that thresholds should also apply to these centres in order to protect their role. A lower threshold of 300 sqm is recommended in order to ensure that impacts arising from proposed convenience stores which can have significant adverse impacts on smaller centres.
4. In terms of local centres which have been reviewed by the officers of the Council's Planning Strategy Team, WYG recommend that the same methodology and approach be applied to these smaller lowest tier centres in the hierarchy as applied by WYG to Blackpool Town Centre and the Borough's District Centres.
5. The following will therefore apply to all planning applications for town centre uses that are out of centre and not in accordance with an approved plan:

An Impact Assessment will be necessary for proposals (including the formation of mezzanine floors) which include retail and leisure which are not located within a defined centre where:

- the proposal provides a floorspace greater than 500 sq.m gross; or
- the proposal is located within 800 metres of the boundary of a District Centre and is greater than 300 sq.m gross; or
- the proposal is located within 800 metres of the boundary of a Local Centre and is greater than 200 sq.m gross.

6. The scope and content of any Impact Assessment shall be agreed with the Council and shall be reflective of the scale, role and function of the proposal.

Threshold for Impact Assessment - Local Centres

Briefing Note

1. Introduction

In accordance with the requirements of paragraph 26 of NPPF and the advice provided by the WYG 2018 Study (refer paragraph 4 above), it is proposed to apply an impact threshold to the Borough's Local Centres for the scale of edge of centre and out of centre retail and leisure development which should be the subject of an impact assessment.

2. Local Centre Assessment

The Planning Strategy Team is currently preparing a **Review of Local Centres** across Blackpool which forms part of the evidence base of the Local Plan Part 2: Site Allocations and Development Management Policies Document. The work involves:

- Comprehensive site surveys undertaken during Summer 2017 of each centre to assess their vitality and viability
- Review of the composition of the current local centres (identified on the 2006 Local Plan Proposals Map);
- Review of the existing centre boundaries to ensure that they are appropriate and reflect the changing uses within the local centres;
- Investigating whether any of the previously identified local centres should be removed from the retail hierarchy
- Consider if it is appropriate to add any new local centres.

3. Proposed Threshold for Impact Assessment

The vast majority of local centres identified on the Proposals Map and assessed as part of the Local Centre Review function successfully and maintain an important range of convenience shops and services for nearby residents. However, a new convenience store in close proximity to a local centre could potentially undermine its role and function and have a detrimental impact on the local centre.

National Planning Practice Guidance (NPPG) states that the purpose of the impact test is to ensure that over time proposals in out of centre or edge of centre locations do not have a significantly adverse impact on existing centres.

As identified in the **Blackpool Retail, Commercial Leisure and Hotel Study (2018)**, a blanket threshold is not considered to be appropriate for all types of centres across Blackpool. The location of a main town centre use and its proximity to an existing centre is key in assessing its impact. For

example, a 300 sq.m convenience stores will be likely to have a greater impact on a small centre than it would have on a much larger town centre.

Smaller format stores such as Sainsbury's Local and Tesco Express (and similar) stores are often able to have significant turnovers and it is therefore considered appropriate to consider the trade diversion associated with such proposals where they are in proximity to smaller centres.

Therefore, for the local centres within Blackpool Borough, a lower testing threshold of 200 sqm is proposed. This lower threshold is set at a level which ensures that the impacts arising from proposed convenience stores can be appropriately considered. This 200 sqm threshold would be applicable within 800 metres of the boundary of the relevant local centre. The distance of 800 metres is broadly commensurate with the potential walk-in catchments of smaller centres and is identified by Guidelines for Providing for Journeys on Foot (The Institution of Highways & Transportation, 2000) as being the 'preferred maximum' acceptable walking distance to a centre. This approach is consistent with the advice provided by consultants in the Retail, Commercial Leisure and Hotel Study.

There have been a number of recent appeals where Inspectors have found that such convenience stores can have a significant adverse impact on smaller centres¹. This type of development has the potential to divert expenditure and potential operators from the Borough's local centres and that the setting of lower thresholds is therefore justified.

The proposed lower threshold for local centres is considered appropriate because of their localised role and function, and the fact that the opening of a small format convenience store outside of these smaller centres is likely to directly compete with the type of local needs provision typically found within such centres. It is therefore considered reasonable for applicants proposing developments of 200 sqm gross for local centres to demonstrate that their proposal will not have a significant adverse impact on smaller centres sharing part of the same catchment.

The extent and content of an impact assessment will be agreed with the Local Planning Authority at pre-application stage to ensure that an appropriate level of information is submitted with a planning application.

¹ Such cases include the appeal against the refusal of planning permission for a Tesco Express at Luton (PINS reference APP/B0230/A/13/2203864) and the appeal against the refusal of planning permission for a Sainsbury's Local (PINS reference APP/e59000/A/14/2217680) at Tower Hamlets