

# BLACKPOOL RETAIL PARK

- Unit A  
Centre  
3,382 sqm
- Unit B  
Polo At Home  
8,017 sqm / 745 sqm
- Unit C  
11,115 sqm / 1,115 sqm
- Unit D  
Dunelm Mill  
2,110 sqm / 1,064 sqm
- Unit E  
817 sqm / 817 sqm @ Cent
- Unit F  
Munch Electronics  
8,000 sqm / 745 sqm
- Unit G  
Hawery  
10,015 sqm / 930 sqm
- Unit H  
Slopes  
7,344 sqm / 683 sqm

Approximate Position  
of Ward Line

0 12.5 7.5 50 62.5m  
S1:250

CA1039-Reference: J1039364 Blackpool17.0 Drawings\Terrace Alterations\Planning\Feb\_March\_2013\9364-141\_147-Existing\_Site\_Plan

Project Title	PROPOSED REFURBISHMENT BLACKPOOL RETAIL LANE SQUIRES GATE LANE BLACKPOOL		
Client	LS Retail Warehouse Ltd		
Scale	PLANNING 1:1/250	Drawing Size	A3
Drawn By	ASR	Checked By	PRW
Date	02/13		

Rev.	Description	Rev. By	CHK'D By
1	Ownership and Site Boundary Plan	ASR	PRW
2			
3			

**THE HARRIS PARTNERSHIP**

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14 August 2015  
L 150814 SAV BBC Response for Committee



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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**

Many thanks for your time spent discussing the above application at the meeting with Phil Isherwood of Aldi and Matthew Sobic of this office on 10 August 2015.

The meeting followed the recent Planning Committee on 4 August, where Committee Members deferred the application to Committee on 8 September. The Members deferred the application to enable you to address two final points of clarification in order to recommend that the application is approved. The points of clarification are set out in your correspondence, dated 7 August, and 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 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.

### **Outstanding Issues**

#### **1. Cumulative Impact**

As set out in our letter of 30 July, 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.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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Registered office: 33 Margaret Street, London, W1G 0JD

Accordingly, the previous Committee Report acknowledges that there is no requirement to undertake a formal assessment of impact.

We discussed at the meeting that the threshold only applies to an individual proposal. It does not apply to a combination of proposals. There is no requirement in policy to consider the impact of two distinct proposals, where the combined floor area of two or more proposals is over the threshold of 2,500 sq. m. It follows that the combination of the application proposal and the extant planning permission for a foodstore at Westgate House (Ref: 14/0358) does not trigger the formal requirement for an assessment of the cumulative impact of both proposals.

As impact is not a policy matter that is relevant to the consideration of the application, there are no grounds to object to the proposal under the terms of 'significant adverse impact' as set out at Paragraph 27 of NPPF.

In any event, we provided a cumulative impact assessment with our letter, dated 30 July, that demonstrates 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. For ease of reference, a copy of the letter is enclosed at **Annex 1**.

We discussed the retail offer in the centres in the Catchment Area of the proposal and agreed that the convenience goods stores in those centres are small-scale and only fulfil a limited and top-up food shopping role serving an immediate area. They do not fulfil the main food shopping role that the proposed store at Blackpool Retail Park will fulfil. The centres and the convenience goods stores located within them are set out in Table 1 below.

**Table 1 – Convenience Goods Stores in Centres in the Catchment Area or the Proposed Aldi Store**

Centre	Convenience Goods Stores
Highfield Road District Centre	Tesco Express Convenience Store, 43 Highfield Road G&K Mitchell & Son Butchers, 533 Lytham Road Fresh 'n' Fruity Greengrocers, 7 Highfield Road
Abbey Road Local Centre	Abbey News, 178 Abbey Road
Acre Gate Local Centre	Newsagent, 32 Acre Gate
Common Edge Road Local Centre	Cowens Newsagent, 4 Common Edge Road Premier Stores, 17 – 19 Common Edge Road
Harrowside Local Centre	Co-op Food, 71 Harrowside
St Anne's Road Local Centre	Costcutter, 455 St Anne's Road Bargain Booze, 457 – 459 St Anne's Road
Starr Gate Local Centre	Throughgoods Newsagent, 11 Squires Gate Lane

Given the convenience goods stores in those centres are small-scale and only fulfil a limited and top-up food shopping role, we agreed that there are no existing facilities in those centres that the proposal could have a significant adverse impact on. This is consistent with the conclusion reached by Fylde Borough Council in its decision to support the Westgate House application (Ref: 14/0358).

We confirmed at the meeting that South Shore District Centre is not located within the Catchment Area of the proposal and so facilities within that Centre will not serve the same area as the proposal. Therefore, the proposal will not have a significant adverse impact on any existing stores within that Centre. In any event, we agreed that as there is an existing Aldi store adjacent to South Shore District Centre, the Aldi store proposed at Blackpool Retail Park will not have a significant adverse impact on the Centre as the area that it serves is already served by an established Aldi store. This point further supports the agreed position that South Shore District Centre is not located within the Catchment of the proposed store.

Although not a formal requirement of planning policy, the applicant has provided clear evidence to demonstrate that neither the solus impact of the proposed development nor 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**

We have previously set out in our correspondence, dated 15 May 2015 and 30 July 2015 a number of reasons as to why the Booths site is not sequentially preferable site to the application site and nor is it suitable or viable to accommodate the proposed operation by Aldi.

We discussed in detail the following two 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 in order to confirm that the proposal satisfies the sequential test as required by Paragraph 27 of NPPF.

### **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 previous 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.

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; and
- 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 previous 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. The proposed foodstore will function as part of the existing established retail destination at Blackpool Retail Park. The retail destination is clearly an edge of centre retail location. It follows that the Booths site is not sequentially preferable to the application site.

We discussed how 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.

In addition, we discussed that given the scale of the existing retail development at Blackpool Retail Park and the great range of retail facilities that enable linked customer trips between stores to occur, there will be a greater propensity for people to visit the Retail Park by bus, or other sustainable modes of transport, than the existing Booths store.

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 is therefore a much more accessible location than the Booths site and accords with the overarching objective to deliver sustainable forms of development.

### **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.

In addition, Phil Isherwood of Aldi confirmed at the meeting that the retailer has considered the Booths site and concluded that it is not a suitable or viable location for an Aldi store. A copy of a letter from Mr Isherwood providing evidence that confirms the Booths site is not suitable or viable for the retailer is appended to this letter at **Annex 2** and summarised as follows:

- i. The existing building is not suitable for an Aldi operation;
- ii. The costs involved in making the unit suitable for an Aldi operation would make the scheme unviable; and
- iii. The site is not a suitable location for food retailing. It would not generate sufficient trade to enable a viable food retailing operation. This is also evidenced by Booths decision to cease trading from the store.

The evidence from Aldi supplements the evidence in our earlier correspondence, dated 30 July 2015 (**Annex 1**). The comments in relation to the suitability and viability of a proposed Aldi store are summarised as follows:

- i. 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:
  - a. the residential population around St Annes Road and Squires Gate Lane;
  - b. the holiday accommodation to the west of the site;
  - c. the overtrading at the existing Morrisons store adjacent to the application site; and
  - d. other customers visiting the wider Retail Park that reside outside the immediate catchment area of the store.
- ii. 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. Aldi confirmed that this is the case at the recent meeting.

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 confirmed at the meeting that it 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 that are required to be addressed in order for you to recommend the application is approved, namely:

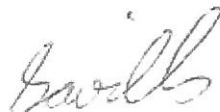
1. The cumulative impact of the commitments and the proposed development will not trigger a 'significant adverse impact' on Blackpool or any other defined centre. Impact is not a consideration that is relevant to the determination of the application;
2. The Booths site is not sequentially preferable 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.

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.

We would be grateful if you could confirm by return that the above enables you to recommend to Members at the Committee on 8 September 2015 that the application should be approved.

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 cursive script, appearing to read "Savills", is written in dark ink.

**Savills**  
Retail Planning

cc. I Bramley – Land Securities

Enc.



30 July 2015  
L 150730 SAV BBC Final Policy Response



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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.

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## 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.

<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:

- 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
- 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:

- Is the Booths site sequentially preferable to the application site?
- 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.

<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 cursive script, appearing to read "Savills".

**Savills**  
Retail Planning

cc. I Bramley – Land Securities



## ALDI STORES LIMITED (MIDDLETON)

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FY1 1LZ

13<sup>th</sup> August 2015

Dear Gary

### **Proposed Aldi Store at Blackpool Retail Park Appraisal of Booths Unit on Highfield Road**

I write following our meeting earlier this week regarding the proposed Aldi store at Blackpool Retail Park and issues concerning the Sequential Test. As discussed at the meeting, Aldi has already considered the Highfield road site and concluded that it was not suitable. I have set out below the reasons for this conclusion and make reference to the enclosed plan prepared by the Harris Partnership which shows Aldi's store layout overlaid onto the Booths footprint.

The current Booths store has large existing columns (1) that sit within the produce, cereal and confectionary aisle. Aldi sell a limited numbers of lines, from a limited amount of space, the stores are designed to be as compact as possible to reduce any wasted time for staff and customers on the shop floor, as well as not over facing any products. The addition of columns throughout the store would break up merchandising runs and impact on the presentation of product. The store could be widened to accommodate this but there are also existing columns that already protrude into the store along the spine wall (2) approximately 300-400mm. Engulfing the columns in the aisles would eradicate the problems with the merchandising but would lead to an unworkable warehouse configuration (see supplementary drawing 1706 MIDW 005 highlighting this).

The current available warehouse width is narrower than the standard 7m (3) and therefore already requires a non-standard amenity block layout, this further required widening of the store to accommodate the columns and subsequent narrowing of the warehouse will result in a non-workable amenity layout.

In addition to this, there are also columns (340x470mm) set back 1250mm from the shop front (4). These would have a significant detrimental effect on the circulation around the tills and packing shelf and render sections of the packing shelf usable, as there would not be enough space to park and pack a trolley. The store would need to be lengthened by 1250mm to ensure that the same amount of circulation space in a standard store was provided, and would therefore increase the store's length to 56.25m, which is above standard and would again effect Aldi's standard merchandising layout. There are structural walls at the rear of the store that would need to be demolished in order to accommodate the lengthened store. However, some piers (5) will be required and these will sit within the fresh meat cabinets.

Also, due to the building footprint, the trolley bay would need to be located further away from the entrance than Aldi would normally like (6) and would result in a convoluted trolley collection and return.

Delivering goods on pallets straight from the Regional Distribution centre is one of the reasons that Aldi has a competitive advantage. Therefore requesting, that for one store, Aldi receive product from cages (the same as all other retailers) is unrealistic as the warehouse and the infrastructure is not set up to cater for this. A dock leveller and a loading ramp would therefore need to be instated, resulting in considerable and expensive structural works to the rear of the store (5).

The points raised above, coupled with the fact that the building is almost 20 years old and is coming towards the end of its economic life, means that the spending required to bring this unit up to date make the scheme unviable.

Furthermore, Aldi consider that the site is a poor location for food retailing generally, which is likely to be the reason the Booths store is closing. There is little else in the nearby centre to attract shoppers from beyond the centre's immediate walking catchment and Highfield Road is not a busy route, meaning that the store would not attract any significant level of pass-by trade that would be needed to support a store on this site. Accordingly, Aldi consider that this site is not suitable for a food retail operation of this size.

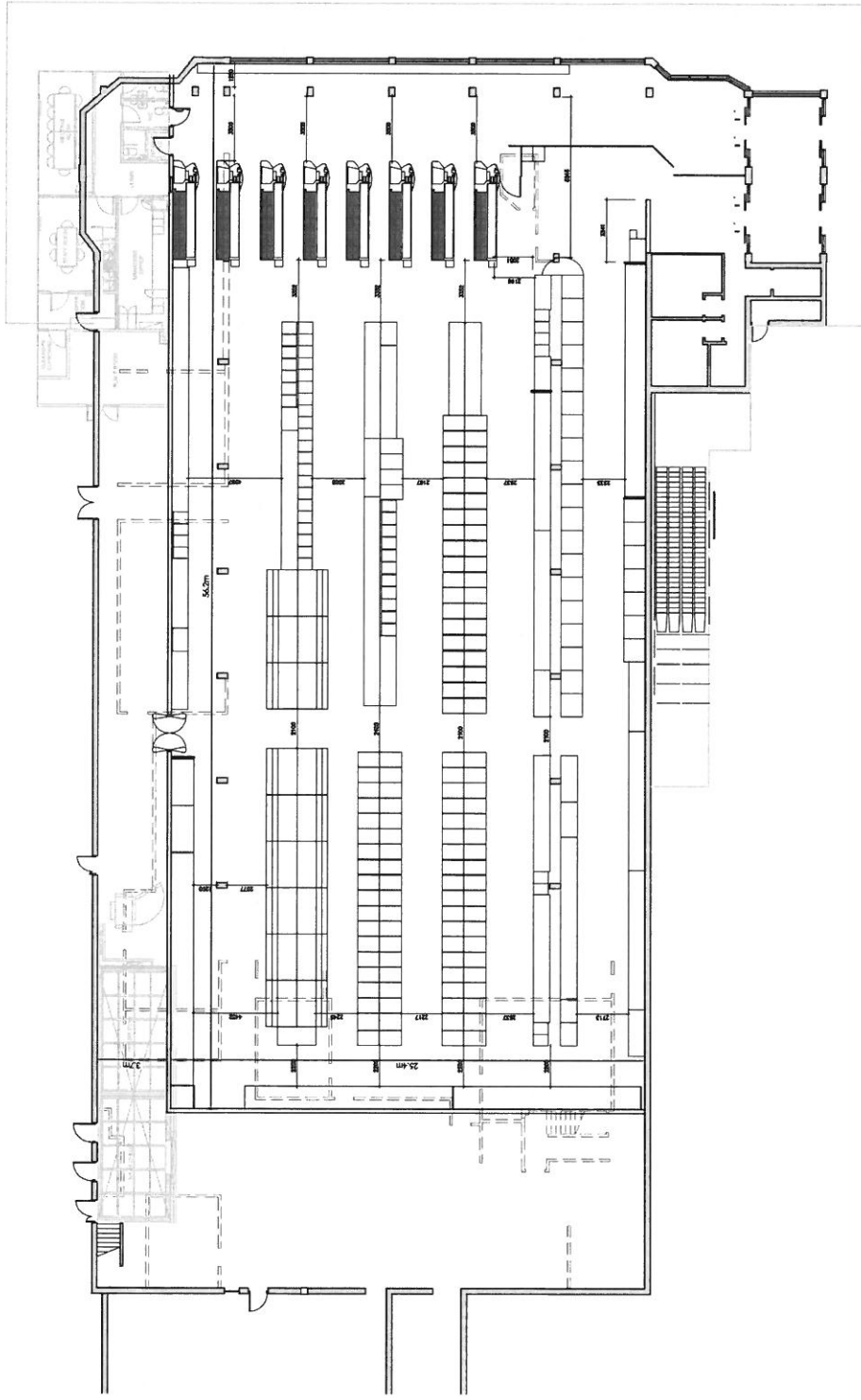
Taking all the above into consideration, Aldi would need to demolish the existing store to build a suitable unit. As Booths are selling the land and shell they have proportioned a value to this site that is well above (more than double) that of a typical Aldi land purchase price. Therefore, the site is not economically viable with Aldi incurring huge ongoing operational losses due to the high land purchase price.

I trust that the above clearly sets out the reasons Aldi has dismissed the Highfield Road site and why the site is not suitable.

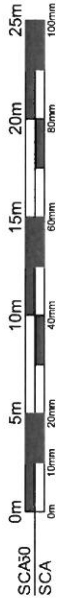
Yours sincerely,



Philip Isherwood  
Property Director  
Aldi Stores Ltd



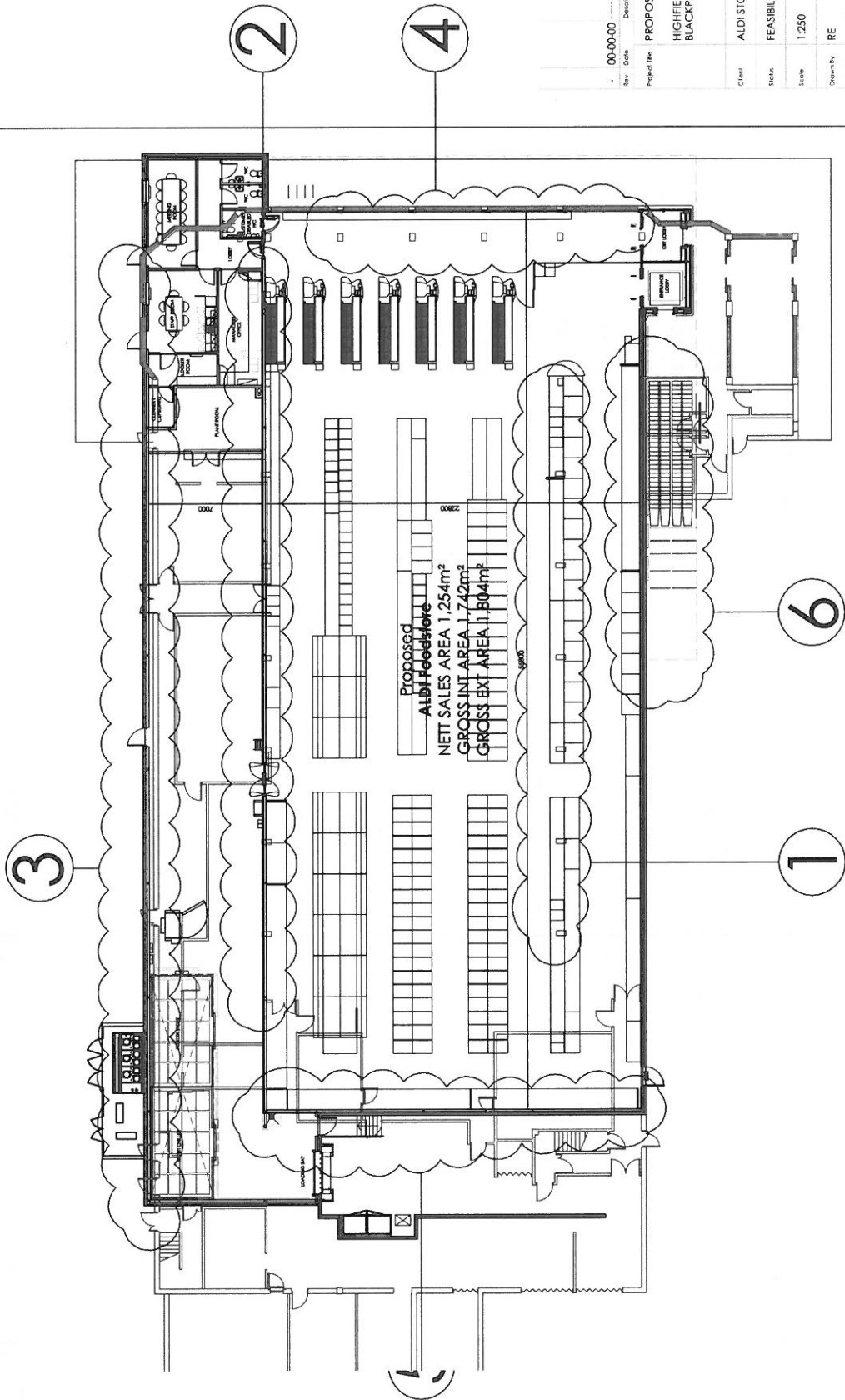
# Glan amended to suit existing columns



Rev	Date	Description	Rev By	Chk'd
00-00-00			XXX	XX
Project Title		PROPOSED DEVELOPMENT		
Client		ALDI STORES LTD.		
Scale		1:250		
Drawing Size		A3		
Drawn By		RE		
Checked By		R/PE		
Date		07.08.1		

Drawing Title: GA Plan amended to suit existing columns  
 Job-Draw No: 1706MIDW-005  
 THE HARRIS PARTNERSHIP MANCHESTER  
 231, JOHN NORTH, WOLVESLEY, WILTSHIRE  
 T. 01924 291 800 F. 01924 290052  
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 77 Dale Street, Manchester, M1 2HG  
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 Manchester, M1 1PL  
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 THE HARRIS PARTNERSHIP READING  
 101 London Road, Reading, RG1 2BY  
 T. 0118 953 7725 F. 0118 953 6842

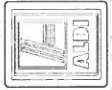




# Glan showing conflicts



XXX XX  
Rev By Chvg



Project title  
PROPOSED DEVELOPMENT  
HIGHFIELD ROAD  
BLACKPOOL

Client  
ALDI STORES LTD.

Stage  
FEASIBILITY

Scale  
1:250

Drawn by  
RE

Checked by  
RJPE

Date  
07.08.1

Drawing Size  
A3

Drawing title  
GA Plan showing conflicts

App'Draw No  
1706MIDW-004

THE HARRIS PARTNERSHIP MANCHESTER  
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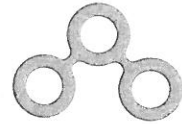
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OBS

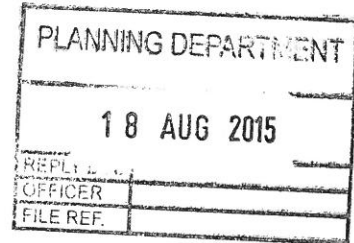


**Steven Abbott Associates LLP**  
Chartered Town Planners

SHA/DB/2760-01/LPA

**VIA EMAIL AND POST**

17 August 2015



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

Dear Mr Johnston

**Application No: 14/0608**  
**Proposed Food Store**  
**Units 21-25, Squires Gate Industrial Estate, Squires Gate Lane, Blackpool**  
**OBJECTION on behalf of E H Booth and Co Ltd (Booths)**

I refer to the above matter.

We are retained by E H Booth and Co Ltd (Booths) as their planning consultants.

Booths have a site in Highfield Road, Blackpool. The site is a material consideration for decision makers on the above application.

The reason for this is that Booths food store on the site is closing down in the next few weeks as it has become obsolete within the Company's current structure of stores. Therefore the whole of Booths 1.1 hectares (2.6 acres) site is available. The sale is being handled by Booths commercial agents and advisers – Robert Pinkus and Company LLP. I am aware that Mr Robert Pinkus has been in communication with you and addressed your committee meeting on 4 August, on Booths behalf.

The significance of Booths site being available now is because of the sequential element of the statutory development plan and national planning policy. Those policies have considerable weight as material consideration. I return to those matters later.

Partners

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At the outset I can endorse Mr Pinkus's advice to your Council on behalf of Booths that the whole of their Highfield Road site is available now.

Booths **OBJECT** to the above planning application for the reasons set out below:

#### The Development Plan

1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990 require that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF) must also be taken into account. Indeed, paragraphs 2, 11, 150, 196 and 210 within the NPPF underline the weight which must be attached to the development plan.
2. The development plan affecting the application site comprises the current Blackpool Local Plan (2001-2016) and the emerging Blackpool Local Plan (2012-2027). Both are material considerations which the Council must, by law, consider before a decision is taken on the planning application at Squires Gate.

#### Current Blackpool Local Plan (2001-2016)

3. Policy BH11 requires the Council to maintain and enhance a hierarchy of centres shown on the Proposals Map. The application site is not part of or on the edge of any of those centres. Booths site in Highfield Road is on the edge of such a centre – a Local Centre in Highfield Road. The Booths site has not only enhanced the prospects of that centre being sustained (as a food store site next door) but it offers a unique opportunity to enhance it in the future.
4. In using this policy the Council has, for many years (in parallel with national policies) recognised the importance of the Local Centre in playing a vital role in maintaining the quality and range of shops and other services for Blackpool residents. Such centres are a feature of Blackpool and cater primarily for top-up shopping for the local community. They are readily accessible by a variety of means of transport including walk-in shoppers. All this is stated in paragraph 6.53 in your current Local Plan.
5. Such centres have been under pressure from out of centre competition for many years as is proven by paragraph 6.54 in the current Local Plan. It states that the Plan recognises the vulnerability of local centres to competing out-of-centre provision and their importance in the social fabric of their local communities. Significantly, it goes on to state that development proposals (like the subject application) which would lead to a loss of food retailing from local centres disadvantage residents, particularly the less mobile.

6. Policy BH12 is material to the subject application also and part of it BH12 (d) is absolutely central to this objection (which we explain below).
7. Policy BH12 requires the Council to focus retail development on the hierarchy of centres described above (appropriate to their scale and catchment). Such uses are only permissible elsewhere subject to number of qualifications.

On those qualifications we comment as follows:-

- (a) Booths do not question the need for a food store in the locale given that its own store has traded from Highfield Road for many years. Booths are vacating the site as unfortunately the location and store format do not fit Booths current model. It is not the suitability of the site for a new store (of a different type). Booths have already had an offer to purchase their site by a discount food store operator, since withdrawn.
- (b) It is obvious that the application site at Squires Gate would cause material harm to the future prospects of the Local Centre next to Booths site. As a consequence the vitality and viability of that centre would be compromised. The point here is that a grant of planning permission at Squires Gate would undermine the prospects of a food store operator taking Booths site for such a development. Booths site is a 'blank canvas' for a food store of an appropriate scale to serve that part of Blackpool. It is easily of a sufficient size, has a practical shape with a good access and more than ample space for car parking, cycle parking and safe, easy going pedestrian routes. Indeed, the site has the potential for more than one Class A unit which together would catalyze the future of the Local Centre.

The application site does not offer any of those benefits. Instead, it will draw the investment away to an out of centre site on a retail park designed to meet the needs of much greater catchment and for car based shopping. As others have stated, including you, it is on the 'wrong side' of the dual carriageway to be a credible site to meet the day to day shopping needs of the local community it purports to serve.

- (c) It follows that the planning application development would undermine the Council's strategies and proposals for regenerating the Local Centre next to Booths site as set out in the adopted Local Plan (I deal with the new one below).
- (d) The planning application development is not located in accordance with the sequential test, having regard to the need for flexibility of format, design and scale. The grant of planning permission for a food store on the application site when a site on the edge of a defined local centre in the same area is available now and wholly suitable is clearly contrary to this part of the development plan. To reiterate, your Council has a

statutory obligation (as explained above) to make decisions in accordance with the development plan. We do not accept, in any respect, that Booths site is incapable of accommodating a food store of the type a discount operator would require for this area of Blackpool. A fundamental mistake being made in this case appears to be a preoccupation with Booths building rather than the merits of the site. It is the site, not the building, which has to be assessed in the context of the sequential approach. Notwithstanding that Booths have made it clear through their agent that they are entirely flexible e.g. the building could be split or leased. We cannot imagine a site easier to develop than Booths one given that it is larger than required for the application development and bearing in mind the other features described above. If the Council does not defend the site as sequentially preferable it may as well forget any attempts elsewhere as its policy would be comprised by setting a bad precedent.

- (e) The Booths site, as you have pointed out, is readily accessible by a choice of means of transport, and is well served by public transport. The application site is not but as part of a retail park is primarily aimed at car borne shoppers with different shopping requirements.
8. Paragraph 6.61 in the adopted Local Plan states that out-of-centre locations (as with the application development) will not be permitted unless it can be demonstrated that there are no more centrally located sites available, with preference for (in this context) local centres. Crucially, it states that suitable alternative sites will be applied flexibly in terms of the size and format of development and how it can be accommodated. There is thus no basis for the Council doing anything other than resisting the application development because of the availability of Booths site. To do so would be contrary to planning law and policy.
9. Policy BH14 'Local Centre's is also a material consideration which must be afforded the due weight necessary as a development plan policy. In the context of the Highfield Road Local Centre next to Booths site:-
- It provides for day-to-day convenience shopping needs and other supportive uses readily accessible by a walk in local catchment. Booths site is very important as an 'anchor' to that local centre and has enormous potential for stimulating its long term betterment. A new store on Booths site (with space for complementary uses) would be ideal to catalyze its economic, social and environmental development – wholly in line with the core principles of sustainable development set out in NPPF.
  - The Council must safeguard and enhance the role of the Local Centre in accordance with Policy BH14. In terms of the criteria below the policy we comment as follows:

- (a) The Booths site fundamentally reinforces the role of the Local Centre.
  - (b) Booths site negates the need for the expansion of shopping and other commercial uses into adjoining residential areas – it enjoys the benefit of Class A1 permission and is available for development now.
  - (c) As such the development of the Booths site would stimulate and not undermine the retail function, role or character of the Local Centre next to it. The application development would have the opposite effect by blighting Booths site. It could then sit idle pending a resolution of its future. An empty site of that scale would clearly not be in the public interest and particularly unwelcome for the local community. Booths do not wish to see that happen and are actively seeking to sell the land to a food store operator quickly.
10. With regard to Policy BH14 the content of paragraph 6.69 on the vulnerability of local centres like the affected one should be noted. It expressly notes the impact out-of-centre food stores have had in local centres in Blackpool.
  11. In conclusion on the adopted Local Plan the Council has very robust reasons for refusing the application development on the basis of its retail policies alone.
  12. I now turn to the status of the application site. As your committee report pointed out on 4<sup>th</sup> August the site is with an industrial and business allocation. This has two aspects – firstly, under Policy DE2 the site is part of the Industrial Improvement Zone for the Squires Gate Industrial Estate. Secondly, it is subject to the criteria based policy DE1 which expressly states that land within industrial/business estates will be retained for such uses. The Council must make a decision which takes account of those policies as the start point for decision making in legal terms. Those policies are of a strategic nature and given the location of the application site they are sensible and realistic in terms of the potential for the land from an economic development perspective. Neither policy makes any provision to release the allocated land for retail purposes. Clearly, such a release would be a departure from the Local Plan and in the (hopefully) unlikely event that the Council would ignore its own policies would have to be referred to the Secretary of State to establish if it wishes to recover the application for decision-making. Given the objections made including this one it could result ultimately in a costly and unnecessary public inquiry for all parties involved.
  13. As on retail policy the grant of permission on the application site would be contrary to your Local Plan on the basis of your industrial land and business policies.

14. We note that the application site is within the Enterprise Zone (EZ) only designated in June 2015. We respectfully suggest that the Council needs to decide on the scope for development within that before releasing land on an ad hoc basis for what would be a 'non conforming' use. Clearly, the EZ was not designated to facilitate out-of-centre retail development but to stimulate, as a matter of urgency, economic growth based on sustainable employment. In spatial terms, the application site could play an important role as an articulation point between the existing inward looking, single destination Retail Park and new industrial and business areas. More particularly, it could be used to connect the two areas in a way which enables people in their places of work to walk or cycle to the retail facilities in the retail park through an attractive area. This would be mutually beneficial to both land use areas. Whilst it is early days for the EZ it would be premature to release the application site on an ad hoc, piecemeal basis and wholly unjustified now as it could compromise the EZ master plan for the reasons explained. We think this is an additional material consideration to justify resisting the application.

The 'New' Emerging Blackpool Local Plan (2012-2017)  
(Core Strategy)

15. The new Local Plan (CS) is at a relatively advanced stage (post the EIP) and is therefore also worthy of weight as a material consideration.
16. In the context of the above comments on current Local Plan policies DE1 and DE2; and the newly designated EZ we note your advice to members of the Council in August 4<sup>th</sup> concerning the evidence base to the CS. We do not accept that the location of the application site and its relationship to a very old estate road system justifies its release as a 'one off' on an ad hoc basis. As we have stated above, this is not only directly contrary to the current Local Plan but is premature and at odds with the aims of the EZ. The EZ is not a license for 'anything goes' but a permissive regime to facilitate certain types of development in accordance with a fast tracked masterplan. It is about creative zoning and not piecemeal chaos.
17. With regard to policies in the CS I firstly refer you to Policy CS1. It supports growth in South Blackpool for wider housing and employment needs not out of centre retail development on land allocated for the latter. Paragraph 4.9 and the key diagram reinforce this point. Again, the Council must take account of this policy (CS1).
18. Policy CS3 - Economic Development and Employment is also important. It expressly safeguards existing industrial/business land for employment use. There is no reference to out of centre retail development being part that strategy. In addition Policy CS3 1c expressly refers to South Blackpool as a strategic priority.



19. In the context of this sphere of policy, paragraph 5.32 stresses the need to provide better quality employment sites with new sustainable employment development.
20. Figure 12 identifies the application site as being within a 'Main Employment Site'.
21. On the subject of retail policy, the CS continues with the policies set by the current Local Plan in terms of the Local Centre next to Booths site (consistent with the NPPF).
22. Under Policy CS4 3 – out of centre location proposals for new retail development (as in the case with the application development) will not be permitted where there is a more centrally located/sequentially preferable, appropriate site available for development (CS4 3a).
23. Furthermore, such proposals will not be permitted where out of centre development would cause a significant impact on a local centre (CS4 3 6) – as would be the case, for the reasons already explained.
24. As with the current Local Plan, the application development would undermine the Council's strategies and proposals for regenerating a local centre. This is, as explained above, because it would undermine the future use of Booths site for a new food store development by allowing development on an out-of-centre site close enough to compromise its future and thus the Local Centre next to Booths. Therefore, the Council must see that the proposal is contrary to Policy CS4 3 c.
25. In addition, as with the current Local Plan, the proposed development would be contrary to Policy CS4 3 d – as it is not readily accessible by public transport and other sustainable transport modes in the way Booths site most certainly is.
26. Figures 12 and 14 confirm that your Council has reiterated its identification of the Local Centre next to Booths site.
27. When the Council proceeds with its site allocations part of the emerging Local Plan it will be wholly logical to allocate Booths site for retail purposes to enhance the future of the Local Centre and surrounding community. If the opportunity is missed now to protect it, its future will be thrown into uncertainty to the detriment of that community.
28. Our conclusion on the emerging 'new' Local Plan is that firstly, the Council must take account of its policies. A grant of permission for the application development would be perverse in view of those policies. The Council can wholly justify a refusal on the basis of the CS giving it a very strong position on appeal given the weight which must be attached, in law, to the development plan.



29. We have read the various submissions made by other parties, including the applicant's agents, and cannot see any credible reason for a grant of planning permission. The publicly stated and formal position of Booths that the site is available makes a contrary argument hopeless given the readiness of the site for development and the flexibility provided by its size, shape and location. It is difficult to imagine a better opportunity for the type of store proposed by the application. Clearly, those considerations affected the discount operator who made an offer to Booths for the site

#### The NPF and related Guidance

30. I pointed out at the outset of this letter that the NPPF is a weighty material consideration in its own right. Whilst the development plan and EZ both give the Council very robust grounds for refusing the application development the following parts of the NPPF and Guidance add weight to the Council's justification for a refusal.
31. With regard to paragraph 21 in the NPPF (under 'Building a strong, competitive economy') Blackpool's CS is in line with what the NPPF requires in terms of a clear economic vision and strategy. The application is within an identified strategic site which is expressly aimed at the sectors envisaged in this part of the NPPF and not an out-of-centre food store.
32. In terms of paragraph 22 in the NPPF there is a very good prospect of the application site being used for employment. This is because of its location and the emerging EZ status.
33. Section 2 in the NPPF 'Ensuring the Vitality of Town Centre's' absolutely endorses the current and emerging local plans as the statutory development plans for Blackpool.
34. The start point on this key area of policy, which the Council must also take into account as a material consideration is the definition of 'Town Centre' and 'Out of Centre' in the Glossary to the NPPF. Crucially, local centres are to be treated (as previously in PPS6) as 'town centres' and protected as such. The Local Centre next to Booths is not a 'small parade of shops' and is identified as a Local Centre in both local plans. It thus must be treated as a town centre. We note that the applicant's agent recognises this status.
35. Conversely, their client's site (the application development) does not enjoy such status and expressly does not constitute a town centre with all the related negative presumptions against retail development as a consequence. The application site is by NPPF Glossary definition an 'Out of Centre' site.
36. We note your scathing criticism of the Applicant's agent's argument that their site is an edge-of-centre one (Committee Report – 4th August). We agree with you and note the

definition of 'Edge of Centre' in the NPPF glossary. It is a location which is not well connected and is more than 300 metres of the centre. Account also has to be taken of local circumstances. We respectfully suggest that arguing that the application site is an edge of centre one is 'scraping the barrel' and not credible.

37. In terms of the bullet points under paragraph 23 in the NPPF:

- Booths site is at the heart of that local community and not remote, on the wrong side of a dual carriageway next to a retail park designed for a different type of shopping (see above).
- The Local Centre next door is defined in the Local Plan and Booths site makes that resilient to future economic changes.
- There is a potential to allocate Booths site for retail as an extension to the Local Centre. Indeed, it has the potential to become a District Centre.

38. Paragraph 24 in the NPPF requires the Council to apply the sequential test to the subject application. The established policy requirements for flexibility on format and scale remain central to this policy. We have already explained why Booths site provides complete flexibility to enable the proposed development to be accommodated.

39. The application development is not in an existing centre (or even on its edge) and is not in accordance with an up-to-date Local Plan. Booths site is and is available now.

40. This is a matter of principle concerning location and context. It is obvious that failing to protect Booths site (as you are required to do) will be harmful to the Local Centre next to it for the reasons stated above.

41. Paragraph 27 in the NPPF makes it crystal clear that a refusal based on a failure to satisfy the sequential test or where the proposed development is likely to have an adverse impact on the above factors would be robust. I stress that this reason would stand in its own right.

42. The weight the Council can attach to this is strengthened by paragraph 001 (ID:26-001-20140306) in the National Planning Practice Guidance (NPPG) which states that the sequential test should be considered first as this may identify a preferable site.

43. Paragraph 002 in that part of the NPPG states that town centre policies are the 'starting point' for decision-makers on individual developments of the application type.

44. Paragraph 008 and 010 offer guidance on what the sequential test is and how it should be used in decision-making.
45. Paragraph 008 states that:- The sequential test guides main town centre uses towards town centre locations first, then to edge of centre locations (Booths site is one) and if neither town centre or edge of centre locations are available (Booths site is available), out of centre locations with preference to accessible sites which are well connected to the town centre (the application site is out-of-centre but suffers from poor accessibility for the local community and is not well connected to any town, district or local centre).
46. In terms of paragraph 010 the onus was on the applicant to demonstrate compliance with the sequential test (and failure to undertake one could constitute a refusal reason).
47. In terms of the criteria below paragraph 010P:-
- Due regard has not been shown to demonstrate flexibility;
  - Booths site has been dismissed without an objective assessment of its true potential;
  - There is a sequentially preferable site – Booths site in Highfield Road.
48. In conclusion on the NPPF and the Guidance which supports it, the Council has very robust reasons for refusing the application development.

### Conclusions

49. The Council has a statutory obligation to determine the application in accordance with the development plan unless material considerations indicate otherwise. There are no material considerations to justify overriding the Council's current and emerging Local Plans.
50. The Council must take account of the NPPF as a material consideration. The NPPF's policy presumes against the development and again, there are no credible reasons for overriding it.
51. More particularly a refusal by the Council is justified on the basis of the following policies:

#### Blackpool Local Plan (2001-2016):

- BH11
- BH12
- BH14
- DE1

- DE2

'New' Blackpool Local Plan (Core Strategy) (2012-2017):

- CS1
- CS3
- CS4

NPPF Paragraphs:

- 2
- 14
- 22
- 23
- 24
- 27
- 150
- 196
- 210

NPPG Paragraphs on town centres:

- 001
- 002
- 008
- 010

New Enterprise Zone (EZ):

The application is prejudicial to its purpose and in any event premature pending its master planning. The loss of the site could compromise an attractive linkage of the strategic employment areas with the retail park

**In all the circumstance, we respectfully request members of the Council to REFUSE the application.**

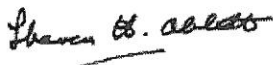
Now that you are aware that Booths site is available and immediately, we hope that you will recommend that planning permission is refused given the weight of the material considerations set out above.

We would be grateful if you could circulate this letter to members of the Council with your committee report.

We reserve our client's right to make further representations in due course.

Please do not hesitate to contact me should you require further information from Booths perspective.

Yours sincerely



**Steven H Abbott**

E-mail: [stevena@abbott-associates.co.uk](mailto:stevena@abbott-associates.co.uk)