

3B: Retail

3B(i)

- 3.21 The County Council supports Policy W5, though it would have been preferable to develop it into a Town Centre Policy, including other town centre employment uses and services (e.g. office development) recognising the importance of town centres for the regeneration of local economies and tying in the concept of town centres as nodes on the Region's public transport networks.
- 3.22 Policy W5 establishes an appropriate hierarchy or network of centres across the Region relating to retail and leisure; and provides a clear and appropriate approach to the scale of development that is expected to locate in city and town centres. The spatial approach in Policy W5 is underpinned by research, 'Town Centre Assessment Study 2005', undertaken by White Young Green consultants (WYG). The research takes into account sustainability, social inclusiveness, wider regeneration strategies and development programmes.
- 3.23 The main findings of the WYG study are that there is strong retail provision throughout the Region and that there is a high retention rate of retail expenditure. The Study states in Paragraph 9.10 that the existing needs of the Region's population can be adequately met within the existing network of centres and that the survey research indicates that no one particular sub region is disadvantaged in terms of retail provision. The existing balanced network of centres allows consumer needs to be met without creating unsustainable patterns of movement. The County Council considers this to be of particular importance.
- 3.24 The network of centres in the Central Lancashire City Region (Blackburn, Blackpool, Burnley and Preston) support the polycentric nature of the City Region, underpinning key regeneration initiatives of the Blackpool Masterplan, Preston City Vision and actions under the ELEVATE transformational agenda in East Lancashire.
- 3.25 The list of towns in Policy W5 needs to be amended to include Skelmersdale to make the policy consistent with Policy RDF1 and Table 7.1. Skelmersdale is one of only three Regional Towns listed in Table 7.1 that are not included in Policy W5 (the others being Runcorn and Ellesmere Port). A retail study prepared by Chestertons for Skelmersdale Town Centre (Skelmersdale Town Centre Mixed Use Development Site, April 2002) identified a need for more comparison floorspace there. Inclusion in Policy W5 would support this, help maintain the viability and vitality of the town centre and underpin wider regeneration initiatives. Draft RSS paragraph 13.5 would seem to support this approach.

3B(ii)

- 3.26 The WYG Study finds that whilst Manchester and Liverpool are by far the strongest retail destinations in the Region, there is still strong retail provision in Cheshire, Cumbria and Lancashire. Paragraph 9.9 of the Study notes that it is evident that there is a good balance of retail provision within the sub-regions thereby avoiding significant unnecessary car journeys to access acceptable facilities.

- 3.27 It is considered that Policy W5 provides an adequate strategic planning framework for the preparation of Local Development Frameworks. Below the regional centres of Manchester and Liverpool, Policy W5 identifies 24 centres where comparison retail facilities should be enhanced and encouraged to ensure a sustainable distribution of high quality retail centres regional centres outside of the regional centres. In Lancashire, Blackburn, Blackpool, Burnley, Lancaster and Preston fall within this tier of the retail hierarchy. This is consistent with the settlement hierarchy set out in Table 7.1 and is supported, with the proviso that Skelmersdale should be added.
- 3.28 From the comments submitted to the NWRA on draft RSS during the formal consultation phase in June 2006, the County Council is aware that Carlisle, Chester and Preston authorities are seeking to modify Policy W5 with a more hierarchical approach that would place those three centres between Manchester/Liverpool and the remaining named centres. The County Council cannot comment on the particular circumstances that apply to Carlisle and Chester, but from a general perspective the County Council does not favour this proposed change:
- There is no evidence base supporting the proposition. It is not supported by the WYG research.
 - It has not been assessed through the SA/SEA process.
 - The proposal has not been subjected to proper consultation.
 - There is no information about how and why these three centres have been identified and whether or not others should be added to this category if it were to be introduced into Policy W5.
- 3.29 Although the list of 24 centres in W2 may cover a wide variety of towns and cities of differing sizes, the approach in W2 is appropriate as it acknowledges that 'any investment should be consistent with the scale and function of the centre, should not undermine the vitality and viability of any other centre or result in the creation of unsustainable shopping patterns'. This provides flexibility in that the policy recognises differing scales and functions, but requires development proposals to satisfy the various tests laid down in PPS6.
- 3.30 This approach is considered satisfactory. In Lancashire, with its geography of closed-spaced town and city centres, elevating Preston above Blackburn, Blackpool, Burnley and Lancaster would broaden the catchment upon which Preston can draw and would, as a consequence, promote unsustainable shopping patterns within the sub area.
- 3.31 The approach taken in Policy W5 in respect of Blackburn, Blackpool, Burnley, Lancaster and Preston is the same as that taken in Policy 16 of the adopted Joint Lancashire Structure Plan 2001-2016. Policy 16 identifies Blackburn, Blackpool, Burnley, Lancaster and Preston as Tier 1 centres in the County's shopping hierarchy. There is no policy differentiation between them. The elevation of Preston into a separate tier above Blackburn, Blackpool, Burnley and Lancaster was discussed at the Examination in Public of the Joint Lancashire Structure Plan in 2004. The Panel concluded 'that no useful purpose would be served by differentiating between Preston and other centres in Tier 1' (Paragraph 8.26 of the Panel report).

3B(iii)

- 3.32 Whilst the County Council is mindful of the requirements of PPS6 paragraph 2.13 bullet 3 with respect to RSS, it is concerned that the floorspace figures within Table 8.4 are stated as a 'floorspace requirement'. PPS6 refers to providing 'in broad terms' the overall need for additional floorspace and in that respect the figures are probably not unrealistic bearing in mind the broad assumptions that have to be made to obtain a figure at a regional level. It is noted that a health warning has been attached to the figures by way of the supporting text in paragraph 8.22 of draft RSS and in paragraph 3.205 of the Technical Appendix. However, the County Council is concerned as to the usefulness of these figures with respect to informing the Local Development Framework process. At a local level, with the sensitivity of local studies, different assumptions will be applied to derive additional floorspace capacity, which will reflect the local circumstances of a centre and this will make it extremely difficult to compare this 'local' figure to the figures set out Table 8.4. Stating the figures as a requirement suggests that there will need to be some sort of apportionment between the centres in the sub-areas. How will this apportionment be decided upon? In view of these difficulties the County Council considers that it is more appropriate to describe the figures within Table 8.4 as 'floorspace potential' rather than a 'floorspace requirement'. Paragraph A3.9 of the draft Implementation Plan requires a similar amendment.