

# Blackpool Local Plan Part 2: Site Allocations and Development Management Policies

**Blackpool Council Response to Inspector's Questions raised in the Preliminary Matters dated 15<sup>th</sup> July and 22<sup>nd</sup> July 2021**

**Blackpool Council**

The logo for Blackpool Council features the text "Blackpool Council" in a serif font. "Blackpool" is in dark blue and "Council" is in purple. Below the text is a stylized, wavy horizontal line in a light blue-grey color.

Question		Blackpool Council Response
Q1.	Is the purpose of the SADMP to meet the aims of the strategic part 1 plan CS and to deliver the development proposed within it? Is the SADMP purporting to do anything else? If so what?	The purpose of the SADMP is to meet the aims of the strategic Local Plan Part 1: Core Strategy and deliver the development identified within it.
Q2.	Can the Council confirm that all of the policies in the SADMP are non-strategic policies or specify which policies are considered strategic policies and why?	We can confirm that all the policies in the Local Plan Part 2 are non-strategic.
Q3.	Do any of the policies of the SADMP supersede any adopted development plan policies (in whole or in part)? If so can these policies be identified? They will need to be specified in the SADMP.	None of the policies in the SADMP supersede policy in the Core Strategy however they do supersede the 'saved policies' from the 2006 Local Plan. Refer to the following link:  <a href="#">Blackpool Council planning policy   Saved policies</a>
Q4.	Please can the Council confirm whether or not it wishes me to recommend main modifications to the SADMP which are considered necessary to make it sound?	We can confirm that the Council wishes the Inspector to recommend main modifications to the SADMP which are considered necessary to make the plan sound as agreed by Full Council at its 10 February 2021 meeting, Agenda Item 12 of the minutes. Refer to the following link:  <a href="#">Agenda for Council on Wednesday, 10th February, 2021, 6.00 pm (blackpool.gov.uk)</a>

<b>Question</b>		<b>Blackpool Council Response</b>
Q5.	Please can the Council amend SD003 by re-considering whether or not each proposed amendment would have a material effect on the SADMP's policies and the interpretation of them and re-classify all proposed amendments as either proposed main modifications or additional modifications, thereby creating two totally separate schedules?	Document SD003 has been amended following the Inspector's request to reconsider the proposed amendments. Please refer to documents attached (email dated 5 August 2021) - Schedule of Proposed Main Modifications and Schedule of Proposed Additional Modifications.
Q6.	Can the Council confirm whether the SADMP and each specific policy is in accordance with the CS? If it is contrary to the CS in any aspect, what is the Council's justification for this?	We consider that the Site Allocations and Development Management Policies within the Local Plan Part 2 are in accordance with the Core Strategy.
Q7.	Do the timetable and milestones for the relevant documents in the LDS reflect what has happened? If not, can the LDS be updated prior to the hearings?	<p>The timetable for the SADMP in the LDS June 2021 is reflective of the progression of the SADMP to submission in June 2021.</p> <p>However the timetable following June 2021 submission is dependent on various factors beyond the control of the Local Planning Authority as highlighted in paragraph 3.5 of the LDS which states:</p> <p>'Once the Local Plan Part 2 is submitted to the Secretary of State the timing of subsequent stages is reliant on the appointed Inspector and dependent on the need to publish and consult on</p>

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		<p>Main Modifications recommended by the Inspector following the examination hearings.'</p> <p>In light of the above the Council do not consider there is a need to update the LDS. Refer to the link below:</p> <p><a href="https://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Documents/SD013-LDS-2021.pdf">https://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Documents/SD013-LDS-2021.pdf</a></p>
Q8.	Has the SADMP been prepared in accordance with an up to date SCI?	<p>The SADMP has been prepared in accordance with an up to date SCI the latter was updated September 2020. Please refer to the link below:</p> <p><a href="https://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Documents/Local-plan-2021/Final-SCI-Adpoted-September-2020-Accessible.pdf">https://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Documents/Local-plan-2021/Final-SCI-Adpoted-September-2020-Accessible.pdf</a></p>
Q9.	Is Policy DM8: Blackpool Airport Enterprise Zone consistent with the CS? If it is contrary to the CS in any aspect, what is the Council's justification for this?	<p>It is considered that SADMP Policy DM8: Blackpool Airport Enterprise Zone is consistent with the Core Strategy including policies CS3: Economic Development and Employment points 1a and 1c; and CS24: South Blackpool Employment Growth points 1 and 2a.</p>

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<p>Q10. Can the Council direct me to the strategic policies which establish the need for a review of the Green Belt boundaries to accommodate housing or economic development?</p>	<p>Reference is made to Green Belt in Core Strategy Policy CS6: Green Infrastructure. At point 1a it states that 'in terms of Green Belt areas, the Council will apply national policy to protect their openness and character, and retain the local distinctiveness'. The policy also states that there is no planned strategic review of the existing Green Belt Boundary during the plan period.</p> <p>Following the adoption of the Core Strategy, the Blackpool Airport Enterprise Zone was designated which included a small area of green belt located in the south east corner of the EZ. In response to this designation, a local amendment to the green belt through the local plan process has been proposed to address this anomaly in the boundary at this specific location with justification set out in our Local Green Belt Review Assessment. Further justification is provided in our response to Q11 in relation to the exceptional circumstances which exist in relation to this proposed detailed change.</p> <p>In light of the above and the fact that Policy CS6 only refers to a strategic review we consider that this specific local proposed amendment to the Green Belt boundary does not undermine the policy.</p>

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Q11.	Can the Council direct me to any evidence which demonstrates the exceptional circumstances necessary to justify releasing the Green Belt land identified in the Blackpool Enterprise Zone and as HAS1.13 from the Green Belt for economic development and housing development?	We are awaiting additional information from the Head of Enterprise Zones in support of our response to this question. This will be sent under separate cover when the information is received.
Q12.	Can the Council explain its position with regard to compensatory improvements to the Green Belt? Are any main modifications necessary to cover this matter?	<p>The Council considers that appropriate compensatory improvements will be provided by the requirements of policy DM8 point 3d which requires the enhancement of the existing playing fields; and point 5 which requires a design framework to include landscaping, green infrastructure, sustainable urban drainage and incorporating cycle and pedestrian connectivity setting out the design principles for the site and taking into account the objectives of the Blackpool Green and Blue Infrastructure Strategy and Action Plan.</p> <p>In relation to point 3 – enhancement of existing playing fields, planning application ref 20/0108 refers providing 12 new playing pitches within the Green Belt to the south of the proposed amendment. This application received permission August 2020 and has been implemented. The new playing fields will be available for play September 2021. In addition current application 20/0564</p>

Question	Blackpool Council Response
	provides for improved sports pitches and new changing facilities.
<p>Q13. Can the Blackpool Airport Enterprise Zone Masterplan referred to in the SADMP be added to the examination library? What is the status of this document? Has it been subject to any public consultation? Has it been approved by the Council?</p>	<p>The Blackpool Airport Enterprise Zone Masterplan September 2018 and the EZ Masterplan Updated Presentation Plan 2020 are attached (email dated 5 August 2021).</p> <p>The Masterplan 2018 was approved by Executive on 5<sup>th</sup> February 2018. Link below Item 7 refers subject to amendments.</p> <p><a href="#">Agenda for Executive on Monday, 5th February, 2018, 6.00 pm (blackpool.gov.uk)</a></p> <p>The Consultation Report which contains the November 2017 draft Blackpool Airport EZ Masterplan document which was the subject of public consultation in November/December 2019 is attached (email dated 5 August 2021).</p> <p>The EZ Masterplan update 2020 was approved by Executive on 7<sup>th</sup> December 2020. Link below Item 5 refers.</p> <p><a href="#">Agenda for Executive on Monday, 7th December, 2020, 6.00 pm (blackpool.gov.uk)</a></p>

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	<p>The updated Presentation Plan is attached (email dated 5 August 2021).</p> <p>The EZ Masterplan document is currently being amended to reflect the revisions as referred in the Executive Report 7<sup>th</sup> December 2020 and the latest consultation which was undertaken in June 2021 - link below refers:</p> <p><a href="https://blackpoolez.com/have-your-say/">https://blackpoolez.com/have-your-say/</a></p>
<p>Q14. Do all the policies, where necessary make it explicitly clear in the SADMP that their geographic application illustrated on the Policies Map? See for example Policies ASA1, DM10, DM27, DM29, DM33 and DM35, are main modifications necessary to address this?</p>	<p>It is considered that with respect to Policies DM27: Conservation Areas and DM35: Biodiversity, the cross reference to the Policies Map may well be better referenced in the supporting text as conservation areas and SSSIs are not designated through the local plan process and can potentially change over the lifetime of the Plan.</p> <p>With reference to policies ASA1, DM10, DM29 and DM33 reference to the Policies Map could also be made in the supporting text which could be judged to be an additional modification. However if the Inspector prefers reference to be within policy then these four policies would need to be added to the Schedule of Proposed Main Modifications.</p>



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Q15.	Please can the Council clarify whether it is intending to 'confirm' its 5-year housing land supply through the SADMP having regard to paragraph 74 of the NPPF? If the Council intends to 'confirm' its 5-year supply can it direct me to its associated evidence.	The Council does not intend to 'confirm' its 5 year supply through the Local Plan Part 2.											
Q16.	What is the timeline for the Marton Moss Neighbourhood Plan to be made?	The updated timeline for the Marton Moss Neighbourhood Plan to be made is set out below:											
		<table border="1"> <thead> <tr> <th>Stage</th> <th>Envisaged Dates</th> </tr> </thead> <tbody> <tr> <td>Consultation on Draft Plan (Regulation 14)</td> <td>Sept – Oct 2021</td> </tr> <tr> <td>Submission of Plan to Blackpool Council (Regulation 15)</td> <td>Jan 2022</td> </tr> <tr> <td>Publication by Blackpool Council of Submitted Plan to allow formal representations (Regulation 16)</td> <td>Feb-Mar 2022</td> </tr> <tr> <td>Independent Examination of Plan (Regulation 17)</td> <td>Apr 2022</td> </tr> </tbody> </table>		Stage	Envisaged Dates	Consultation on Draft Plan (Regulation 14)	Sept – Oct 2021	Submission of Plan to Blackpool Council (Regulation 15)	Jan 2022	Publication by Blackpool Council of Submitted Plan to allow formal representations (Regulation 16)	Feb-Mar 2022	Independent Examination of Plan (Regulation 17)	Apr 2022
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Question		Blackpool Council Response	
		Publication by Blackpool Council of Examiner's Report prior to Referendum (Regulation 18)	May 2022
Q17.	Are there any other neighbourhood plans being prepared in the Borough? If so what is their timeline?	There are no other neighbourhood plans being prepared in the Borough.	
Q18.	What has been done in response to the concerns raised by statutory agencies? Is there any further correspondence which details an updated position which can be submitted to the examination? Is any further work, including statements of common ground, being undertaken, if so, what does this entail and what is its timeline?	<p>The Council's response to the issues raised by the statutory consultees is set out in submission documents SD009a/b. No further correspondence details an updated position. However if the Inspector considers that the production of Statements of Common Ground (SoCG) would assist the Inspector then the Council is content to produce such documents. In relation to this we have been in contact with Natural England (NE), Historic England (HE) and Sport England (SE). Both NE and HE are agreeable regarding the production of a SoCG but due to annual leave and work commitments they would not be able to finalise a document until mid to late September. SE have previously addressed this issue with a 'letter of comfort' which I am informed by SE has been accepted at other Examinations and SE are agreeable to provide such a letter and this could be provided mid to late August.</p>	

<b>Question</b>		<b>Blackpool Council Response</b>
<b>Preliminary Letter (Addendum) dated 22 July 2021</b>		
AQ1.	The Inspector asks: I would therefore be grateful, if the Council considered the revised NPPF in responding to my letter dated 15 July 2021.	For clarification in responding to the questions set out in the Inspector's Preliminary Letter dated 15 July the revised NPPF July 2021 has been taken into account.
AQ2.	I also ask the Council to consider specifically whether the new NPPF has any implications for the soundness of the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Publication Version (Proposed Submission) Regulation 19 and, if it does, how that might be resolved.	The Council has reviewed the new NPPF published 20th July 2021 and does not consider there are any implications for the soundness of the Local Plan Part 2.