

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

Consultation Statement

December 2020

Blackpool Council



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1 Introduction

1.1 This **Consultation Statement** accompanies the Publication Version of the Local Plan Part 2: Site Allocations and Development Management Policies Document. It sets out the information required under the Town and Country Planning (Local Planning) (England) Regulations 2012 and also confirms that consultation has been carried out in accordance with the requirements of Blackpool Council's Statement of Community Involvement.

Statement of Community Involvement

1.2 Section 18 of the Planning and Compulsory Purchase Act 2004 requires Council's to prepare a Statement of Community Involvement.

1.3 The recently updated Council's Statement of Community Involvement (SCI) was adopted in September 2020 and confirms the Council's commitment to engage with stakeholders and the local community during the plan making process and the methods in which the Council will carry out consultation. It can be viewed at www.blackpool.gov.uk/sci

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

1.4 The Council is preparing the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Development Plan Document (from now on referred to as 'Local Plan Part 2'). Figure 1 illustrates the preparation stages.

1.5 The Local Plan Part 2 will:

- Allocate sites for new development including housing, employment and retail and identify areas for safeguarding and protection e.g. public open space, greenbelt
- Designate areas where particular policies will apply e.g. local centres
- Include policies to be applied when considering applications for development e.g. design, amenity and transport

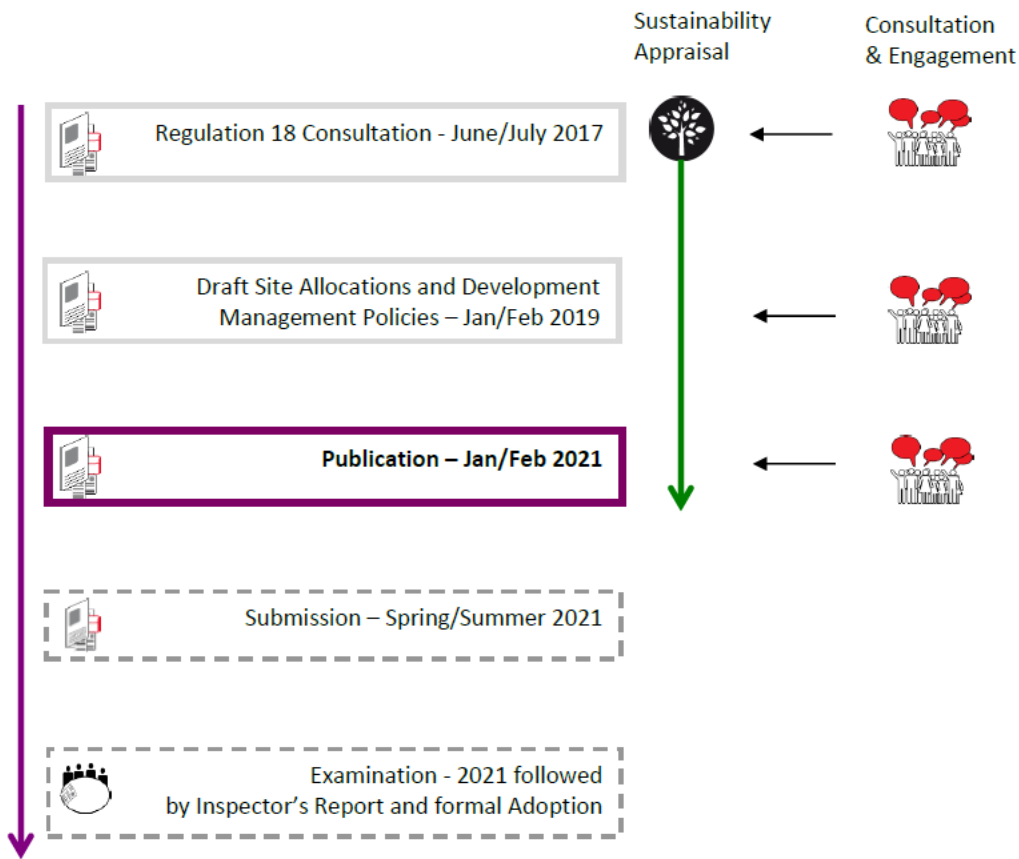


Figure 1: Local Plan Part 2 Preparation Stages

- 1.6 Separate appendices can be found at the end of the report which provide further details of consultation material and responses.
- 1.7 This report will be further updated as the Local Plan Part 2 progresses to submission stage.

Consultation Stages

- 1.8 Consultation on the Regulation 18 Scoping Document was carried out under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This took place during June/July 2017. Further detail is set out in Section 2 of this report.
- 1.9 Consultation on the Informal Paper took place during January/February 2019. This was an informal consultation stage however it was undertaken in accordance with

Regulation 18(2) and the Statement of Community Involvement. Further detail is set out in Section 3 of this report.

- 1.10 Under Regulation 19 of the 2012 Local Plan Regulations, the Council is required to publish the Publication Version of the Plan for consultation. This is the version of the plan that the Council intends to submit to the Planning Inspectorate for examination. This has been informed by the earlier extensive public consultation to ensure that the Local Plan Part 2 is found 'sound'.

Evidence Base

- 1.11 Throughout all stages of the Local Plan Part 2 preparation, various evidence base documents are available to view on the Council's website. This includes Authority Monitoring Reports, Housing Monitoring Reports and the Blackpool Retail, Hotel and Leisure Study. Further information can be found at <http://www.blackpool.gov.uk/evidencebase>.

Sustainability Appraisal

- 1.12 The 'Sustainability Appraisal' (SA) is required by Section 19(5) of the Planning and Compulsory Purchase Act 2004.
- 1.13 The process began in January 2017 with the preparation of an SA Scoping Report for the Local Plan Part 2. This set out the scope of the SA, established baseline information and identified key sustainability issues and opportunities. The sustainability objectives were developed at this stage. The Scoping Report was issued to statutory consultees for the mandatory five-week period. Comments were incorporated into subsequent stages.
- 1.14 SA was carried out for the Informal Paper Local Plan Part 2 and minor amendments were made to the plan, a subsequent SA has been carried out on the Publication Version.

2 Regulation 18 Scoping Consultation

- 2.1 The Regulation 18 Scoping Document was approved by Blackpool Council's Executive Committee on 24th April 2017, and was subject to public consultation from 12th June 2017 until 24th July 2017.
- 2.2 This was the first consultation stage of the Local Plan Part 2 preparation process. The Council sought views on what policies the document ought to contain to ensure we have the right planning policies for Blackpool. We identified a number of policy titles and invited comments on the policies we propose to include in the plan and any additional policies that should be included in the plan.



Consultees

- 2.4 A wide range of local and national interest groups and organisations were consulted in accordance with the relevant consultation regulations.
- 2.5 The Council's Local Plan consultation database included all the relevant statutory consultees and other non-statutory consultees. Non-statutory consultees included key stakeholders across the Council and key external partners. These organisations or individuals were sent an email notifying them of the consultation and invited them to make comments. This email provided a link to the Council's Local Plan webpage. A letter was sent to all those consultees who did not have an email address. A copy of the letter and email can be viewed in Appendix B.
- 2.7 A list of the specific and general consultation bodies can be viewed in Appendix A.

Methods of Consultation

Local Press

- 2.8 A formal notice was published in the Blackpool Gazette on 12th June 2017.

Website

- 2.11 Once the consultation had commenced, the Regulation 18 Scoping Document was available to view on the Council's website, along with other evidence base documents and the accompanying Sustainability Appraisal Scoping Report.

Library and Council Offices

- 2.12 The Regulation 18 Scoping Document and accompanying Sustainability Appraisal Scoping Report were made available at the Customer First Centre and all libraries across the Borough. Response forms were also available to complete and return to the Planning Department.
- 2.13 Hard copies of the Regulation 18 Report, Sustainability Appraisal and all other evidence base documents were also available on request from the Planning Department.

Responses to the Consultation

- 2.16 35 organisations/individuals responded to the Regulation 18 Scoping consultation and a Schedule of Representations was prepared which summarised the responses received and sets out the Council's response. This report can be viewed at Appendix C.

3 Proposed Site Allocations and Development Management Policies - Informal Consultation

3.1 The Proposed Site Allocations and Development Management Policies - Informal Consultation Paper was subject to public consultation from 10th January 2019 until 21st February 2019.

3.2 This was the second consultation stage of the Local Plan Part 2 preparation process. The Council undertook an informal consultation to gain early feedback on the draft site allocations and development management policies.



Consultees

3.3 A wide range of local and national interest groups and organisations were consulted in accordance with the relevant consultation regulations.

3.4 The Council's Local Plan consultation database included all the relevant statutory consultees and other non-statutory consultees. Non-statutory consultees included key stakeholders across the Council and key external partners. These organisations or individuals were sent an email notifying them of the consultation and invited them to make comments. This email provided a link to the Council's Local Plan webpage. A letter was sent to all those consultees who did not have an email address. A copy of the letter and email can be viewed in Appendix D.

3.5 A list of the specific and general consultation bodies can be viewed in Appendix A.

Methods of Consultation

Local Press

3.6 A number of articles were published in the Blackpool Gazette highlighting key issues relating to the Local Plan Part 2 consultation (see Appendix F).

Website

- 3.7 Once the consultation had commenced, the Informal Consultation Paper was available to view on the Council's website, along with other consultation draft evidence base documents.

Library and Council Offices

- 3.8 The Informal Consultation Paper was made available at the Customer First Centre and all libraries across the Borough. Response forms were also available to complete and return to the Planning Department.
- 3.9 Hard copies of the Informal Paper, Sustainability Appraisal and all other evidence base documents were also available on request from the Planning Department.

Social Media

- 3.10 Throughout the consultation period, a number of posts were made on the Council's Facebook and Twitter accounts to raise awareness of the consultation. Examples can be found at Appendix E.

Responses to the Consultation

- 3.11 75 organisations/individuals responded to the Informal Draft Site Allocations and Development Management Policies consultation and a Schedule of Representations has been prepared which summarises the responses received and sets out the Council's response. This report can be viewed at Appendix F.
- 3.12 35 of the representations were objections to/raising concerns over the proposed Traveller and Travelling Showperson site at Faraday Way. The objections included specific representations from Councillor Amy Cross (Blackpool), Councillors Michael and Alan Vincent and Alf Clempson (Wyre), Ben Wallace MP, Paul Maynard MP, Wyre Council, Royal Mail and residents from Blackpool and Wyre. Their objections are set out in the Report of Consultation along with the proposed Blackpool Council Response.
- 3.13 The issues raised with respect to the proposed site allocation include:
- Previous history related to Green Belt/Charter House Land Tribunal;
 - That the proposed site is not an appropriate location close to houses and businesses;

- Impact on the highway;
- Impact on ecology;
- Impact on the loss of trees;
- Potential for anti-social behaviour;
- Other non-planning issues

3.14 Please note with respect to the objections from members of the public, certain comments have had to be redacted due to inappropriate content and are not included in the Report of Consultation.

3.15 Other notable representations received to the Informal Consultation Paper include:

- **Sport England** – Objections to **loss of playing fields** related to three proposed housing allocations including EZ proposals.
- **Representations from Developer Agents** to the proposed locally set threshold for retail and leisure assessments
- **English Heritage** – raising various issues
- **Countryside Area Designation** - Fylde Council supports the Countryside Area designation and suggests the area should be considered for Green Belt. One objection received to the proposed designated.

3.16 It is worth noting that 11 policies received no objection:

- DM4 Student Accommodation
- DM6 Residential Conversions and Subdivisions
- DM11 Primary Frontages
- DM12 Secondary Frontages
- DM13 Amusement Centres, Betting Shops and Pawnbrokers in the Town Centre
- DM14 District and Local Centres
- DM34 Allotments and Community Gardens
- DM35 Open Land Meeting Community and Recreational Need
- DM37 Blackpool Victoria Hospital
- DM38 Blackpool and Fylde College – Bispham Campus
- DM40 Aerodrome Safeguarding

Appendix A: List of Specific and General Consultation Bodies

Specific / Statutory Consultees	
Homes England	National Grid Land & Development
Lancashire County Council	Coal Authority
Fylde Borough Council	Environment Agency
Wyre Borough Council	Historic England
Preston City Council	Natural England
St Anne's Parish Council	Highways England
Westby with Plumpton's Parish Council	Network Rail
Staining Parish Council	
NHS England	Marine Management Organisation
British Gas Properties	Orange
Electricity North West	O2
United Utilities	BT Group Plc, Regional Manager North West
Hutchinson 3G UK Limited (Three)	Mono Consultants Limited
Mobile Operators Association	T-Mobile
	Vodafone

General / Non-Statutory Consultees	
Elected Representatives	Youth Groups, Schools, Colleges
Blackpool North MP	Blackpool Young People's Council & Blackpool Voice
Blackpool South MP	Blackpool & Fylde College
European MPs	Blackpool Sixth Form College
Blackpool Councillors	Blackpool Scouts Service Team
Bodies representing Disabled People	Revoe Community Primary School
Fylde & Wyre Society for the Blind	
Motor Nuerone Equalities Forum	Local Businesses / Business Groups
Leonard Cheshire North West Region	Business Link Lancashire
Princess Alexandra Home for the Blind	Federation of Small Businesses
Blackpool Society for Mentally Handicapped	Lancashire Economic Partnership
Blackpool Fylde & Wyre Mind	Blackpool Self-Catering Association
Deaf Society	StayBlackpool
Fibromyalgia Support Group	Lancashire and Blackpool Tourist Board
RNIB	Blackpool Fylde & Wyre Trades Union Council
	North & Western Lancashire Chamber of Commerce
Voluntary Bodies	The Mersey Partnership
Council for Voluntary Service	CL Edwards & Sons Ltd
Barnardos Blackpool Project	Blackpool Licensed Taxi Operators Assoc.
Blackpool SURF	Campaign for Real Ale (CAMRA)
Community Futures	Lancashire Fire & Rescue Service HQ
Blackpool Friends of Kingscote Park	Tesco
Blackpool & Fylde Rail Users' Association	Blackpool BID

Friends of the Grand	Town Centre Manager
	Advice Link
Public Transport Operators	Blackpool Chamber of Trade
Blackpool Transport Services Ltd	Blackpool Major Retailers Consortium
First North Western	Citizens Advice Bureau
Northern Rail	Blackpool Airport
Virgin Trains (North West Region)	RealTimeUK North
	King Street Dental Surgery
Conservation, Preservation & Amenity	In the Pink Leisure
Civic Trust Regeneration Unit	Blackpool & Fylde Friends of the Earth
CPRE Lancashire Branch	Fylde Coast Bridleways Assoc.
Council for the Protection of Rural England	Fylde Coast Cycling Action Group
Lancashire Wildlife Trust	Ramblers Association
RSPB	RSPB
National Playing Fields Association	Sport England
Sustainability North West (SNW)	Bourne Leisure
Theatres Trust	Blackpool Football Club
The Woodland Trust	Job Centre Plus Blackpool
Conservation Officer Lancashire Wildlife Trust	Blackpool Airport
Fylde Bird Club	Evening Gazette
Blackpool Environmental Action Team (BEAT)	ReBlackpool URC
Blackpool & Fylde Conservation Volunteers	Martin Yates Independent Living Services
Blackpool Civic Trust	Blackpool Pleasure Beach
	Leisure Parcs
Different Religious Groups	Carers UK
Faith Forum	Beneast Training Ltd
Blackpool Congregations of Jehovah's Witnesses	Progress Recruitment
	Royal Mail Group Plc
Other	Department For Constitutional Affairs
Lancashire Constabulary	Public Sector Manager Ubiquis
	Relate Lancashire
	Blackpool Combined Association
	Blackpool Connexions
	Morrison Supermarkets PLC
	Noble Organisation
	Warburtons Fylde Ltd

Appendix B: Copy of consultation notification – Regulation 18

Date: 12th June 2017

XXXX
XXXX
XXXX
XXXX
XXXX

Our Ref: LPP2-Reg18
Direct Line: 01253 476009
Email: planning.strategy@blackpool.gov.uk

Dear Sir / Madam

**BLACKPOOL LOCAL PLAN
PART 2: SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES
REGULATION 18 SCOPING CONSULTATION**



Blackpool Local Plan Part 2: Site Allocations and Development Management Policies – Regulation 18 Scoping Document

The Local Plan Part 2 will:

- Allocate sites for new development including housing, employment and retail and identify areas for safeguarding and protection e.g. public open space, greenbelt
- Designate areas where particular policies will apply e.g. local centres
- Include policies to be applied when considering applications for development e.g. design, amenity and transport



Have your say!
Public Consultation takes place between Monday 12th June and 5pm Monday 24th July 2017

For further info: www.blackpool.gov.uk/localplanpart2

Blackpool Council is currently consulting on the **Local Plan Part 2: Site Allocations and Development Management Policies – Regulation 18 Scoping Document**. This is the first consultation stage of the Local Plan Part 2 preparation process. The Council is seeking views on what policies the document ought to contain as we want to ensure we have the right planning policies for Blackpool.

Consultation continues until 5pm Monday 24th July 2017

All documents relating to this consultation and how to respond can be found on the council website:

www.blackpool.gov.uk/localplanpart2

They are also available to view during normal opening hours at:

- Customer First Centre, Municipal Buildings, Corporation Street
- All libraries across the Borough

The Council is also undertaking a ‘**Call for Sites**’ and asking local residents, businesses, landowners and developers to identify potential sites for development, or protection from development, in Blackpool. Further information can be found at www.blackpool.gov.uk/callforsites

This is your opportunity to comment on the policies and proposals for Blackpool. We are keen to hear your views. If you have any queries, please do not hesitate to contact us.

Yours faithfully

Ms Jane Saleh
Head of Planning Strategy

Appendix C: Schedule of Representations – Regulation 18

Blackpool Local Plan Part 2: Site Allocations and Development Management Policies - Regulation 18 Scoping Document

Consultation June-July 2017

Schedule of Representations



Ref.	Name/ Company	Comment	Council Response
001	Lancashire Archaeological Advisory Service	No comment	-
002	Historic England	<p>Expects the Local Plan to include a proper description, identification and assessment of the Historic Environment</p> <p>The Plan needs to demonstrate how it conserves and enhances the historic environment of the area.</p> <p>A sound up to date evidence base on the historic environment</p> <p>The Local Plan should include specific policies for the historic environment in order to help inform decisions that affect it. Key issues that need to be considered are:</p> <ul style="list-style-type: none"> • Undesignated heritage assets • Designated heritage assets • Archaeology • Conservation areas • Registered parks and gardens • Heritage at risk • Important views and vistas • Landscape character • Individual settlements • Historic shopfronts and advertisements • Public realm • Design • Information to accompany an application <p>Consideration needs to be given to strategic cross boundary issues that affect the historic environment.</p>	The Council will fully consider the Historic Environment throughout the development of policies in the Local Plan Part 2.

Ref.	Name/ Company	Comment	Council Response
		Before allocating any site, there needs to be an evaluation of the impact the proposal might have on a heritage asset and its setting through a heritage impact assessment.	
003	A Webster	<p>Supports the need to bring back international flights to Blackpool Airport including a new train or tram link. The airport has been impacted by new housing developments.</p> <p>Concerned about the scale and size of housing around Marton Moss suggesting here are too many being built and some of the housing are for the rich only 6 bedroom mansions.</p> <p>There is a need to demolish old hotels and replace them with new, but do not turn them into apartments this would impact on Blackpool's tourism.</p>	<p>Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2.</p> <p>The Council acknowledges and recognises in the Core Strategy a neighbourhood planning approach would allow the community to shape policies which may allow some new housing development.</p> <p>The issue of Blackpool's Visitor Accommodation offer is set out in the Core Strategy Evidence Base Document – Fylde Coast Visitor Accommodation Study (2008) and is covered by Core Strategy policies CS21: Leisure and Business Tourism and CS23: Managing Holiday Bedspaces.</p>
004	J Mcculloch	Supports the need to bring back international passenger flights to Blackpool Airport.	Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2.
005	V Oshea	Supports the need to bring back international passenger flights to Blackpool Airport.	Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2.
006	L Goupil	Supports the need to bring back international passenger flights to Blackpool Airport.	Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2.
007	P Robinson	Supports the need to bring back international passenger flights to Blackpool Airport.	Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2.

Ref.	Name/ Company	Comment	Council Response
008	T Aitkenhead	Supports the need to bring back international passenger flights to Blackpool Airport.	Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2.
009	M Farrar	Supports the need to bring back international passenger flights to Blackpool Airport.	Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2.
010	K Walker	Supports the need to bring back international passenger flights to Blackpool Airport.	Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2.
011	A Harbottle	Supports the need to bring back international passenger flights to Blackpool Airport.	Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2.
012	J Hamilton	Supports the need to bring back international passenger flights to Blackpool Airport.	Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2.
013	N Harman	<p>Supports the need to bring back international passenger flights to Blackpool Airport and extend the trams into the airport as well as Blackpool North station.</p> <p>Raises concern with the homeless and drug problem in the town.</p> <p>Abandoned duvets across the town</p> <p>Concerned about the large amount of shops shutting down.</p>	<p>Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2.</p> <p>These issues are currently being tackled by the Council's Enforcement Teams.</p>
014	P Jenkinson	Supports the retention of Blackpool Airport. Ensure it is self-sustainable to attract a wider audience.	Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2.

Ref.	Name/ Company	Comment	Council Response
015	Wyre Borough Council	<p>The Local Plan Part 2 provides further detail to the strategic policies set out in the Council’s Local Plan Part 1: Core Strategy. Wyre accepts that the Blackpool Core Strategy was found sound, and that the Strategy set out within the document was found to be a sustainable strategy. However, these conclusions were drawn on the basis of the information available at the time which did not indicate an un-met housing need arising in a neighbouring authority within the same HMA. The Duty to Cooperate Statement submitted to that examination was drafted at a time when it was thought that all the Fylde Coast authorities could meet their own OAN. Indeed the Inspector’s Report into the Blackpool Core Strategy noted:</p> <p><i>8. In the light of the February 2014 SHMA, which sets out a range for the objectively-assessed need for new housing in Fylde, Wyre and Blackpool, each authority has indicated through discussions that it considers that it is likely to be able to accommodate its need within its own boundaries. Concern has been raised that the housing requirement for Blackpool set out in the plan and those indicated in the Preferred Options reports for Fylde (2013) and Wyre (2012) are, together, less than the lowest indicated figure in the SHMA for housing need across the Fylde Coast. However, the Fylde and Wyre Preferred Option reports pre-date the February 2014 SHMA and Blackpool Council has stated that the neighbouring authorities have indicated that the housing requirement in their emerging Local Plans will reflect the SHMA. Consequently, notwithstanding the Preferred Options housing figures set out some years ago, there is no reason to believe that the objectively assessed need for housing across the Fylde Coast will not be provided for.</i></p> <p><i>9. Nonetheless, given the importance of meeting housing needs across the Fylde Coast housing market area it is necessary for</i></p>	<p>In November 2017 Blackpool Council formally responded to the consultation on the Publication Draft Wyre Local Plan. The submitted representation sets out Blackpool Council’s position regarding the Wyre Local plan, supporting information, evidence base and the Duty to Cooperate.</p> <p>As noted in the representation, there is a commitment in the Blackpool Core Strategy to work with Wyre (and Fylde) to ensure that the housing needs of the housing market are met. However, this does not negate the significant concerns that Blackpool Council has about the approach proposed to calculating housing need and addressing this need as set out in the Publication Draft Wyre Local Plan and supporting documents.</p> <p>The Wyre Local Plan has now been submitted and the issue of housing need in Wyre will be addressed as part of the Examination process.</p> <p>The Duty to Cooperate process is ongoing and further engagement will take place with Wyre Council, Fylde Council and other relevant bodies as the Blackpool Local Plan Part 2 progresses.</p>

Ref.	Name/ Company	Comment	Council Response
		<p><i>the plan's effectiveness for it to be clear that the Council will continue to work with neighbouring authorities to ensure that the overall housing needs of the housing market area are met. Modification MM04 is thus necessary to soundness, although this in no way undermines the extent or effectiveness of the Council's co-operation with others in preparing the plan.</i></p> <p>Main modification 04 was an addition of a paragraph to the supporting text of policy CP2. The added paragraph is at 5.23 which states:</p> <p><i>"The SHMA identifies an Objectively Assessed Need for each of the Fylde Coast authorities within the housing market area. The Council will continue to work with the neighbouring authorities of Fylde and Wyre through the Duty to Cooperate to ensure the overall housing needs of the housing market area are met in full".</i></p> <p>This modification was proposed following representations to the publication version of the Plan which outlined concerns over the flexibility of the Plan to adapt were a shortfall in housing to arise within the housing market area. It is possible that the Inspector's conclusions on housing need drawn from an EIP in May 2015 may be very different with the new information available today.</p> <p>The proposed list of policies and indeed the entire Regulation 18 Scoping Document makes no reference to the unmet housing need arising in the neighbouring authority of Wyre. The Sustainability Appraisal Scoping Report notes that "The sub-region demonstrates a high level of self-containment in terms of housing markets, travel to work patterns and economic functionality; and the Fylde Coast authorities have been</p>	

Ref.	Name/ Company	Comment	Council Response
		<p>working together on strategic planning issues for many years. It has been important to address cross-boundary issues in a collaborative way, to ensure Blackpool’s Local Plan Part 2 aligns with the policy framework of neighbouring authorities, and co-operate with them on strategic planning issues”.</p> <p>Wyre Council is surprised that the Regulation 18 document itself does not reference the issue of unmet housing need arising from Wyre and considers that this is a serious omission in the scoping of the document. As noted in the SA it is vital that Blackpool’s LP Part 2 aligns with the policy framework of neighbouring authorities.</p> <p>Wyre has been raising the issue of potential unmet housing need with Blackpool (and other neighbouring authorities) informally since May 2015. From mid-2015 Wyre was raising the issue of likely un-met housing need at the Fylde coast Duty to Cooperate meetings. In late 2015 and early 2016 representatives from Blackpool Council attended meetings in Wyre with Lancashire County Council and Highways England to discuss the emerging highways evidence for the Local Plan which was showing the severe highways constraints the Borough faces. Draft versions of the emerging highways evidence were also shared with Blackpool throughout production. Subsequently a formal written request for assistance was raised with the Council in May 2016. A series of letters were exchanged in late 2016 between the two authorities discussing the matter.</p> <p>Wyre considers that the Local Plan Part 2 should consider this matter and respond to the shortfall accordingly. As part of preparing the Local Plan Part 2, Blackpool will need to examine available and deliverable land to meet development needs. It</p>	

Ref.	Name/ Company	Comment	Council Response
		<p>should therefore consider as part of the process how it can assist in meeting the shortfall in Wyre through allocating additional land for development.</p>	
016	H Salt	<p>Supports the need to bring back international passenger flights to Blackpool Airport.</p>	<p>Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2.</p>
017	Theatres Trust	<p>Supports the inclusion of a policy to promote and protect community and cultural facilities.</p> <p>Culture and the creative industries play a key role in developing vibrant town centres which are at the economic and social heart of sustainable communities. Cultural and community facilities support the day to day needs of local communities and help promote well-being and improve quality of life. It helps develop a sense of place and that makes communities unique and special. There is also a growing awareness of the role that the arts and culture play in attracting and retaining residents and developing a skilled workforce.</p> <p>Local plans should therefore support arts and culture at all levels to support the local economy and ensure that all residents and visitors, and future generations, have access to cultural opportunities. Policies should protect, support and enhance cultural facilities and activities, particularly those which might otherwise be traded in for more commercially lucrative developments, and promote cultural led development as a catalyst for regeneration in town centres.</p>	<p>Support noted. The council will consider the draft wording when developing a community facilities policy.</p>

Ref.	Name/ Company	Comment	Council Response
		<p>The Theatres Trust recommends inclusion of a policy with wording along the lines of:</p> <p><u>Cultural and Community Facilities</u></p> <p>Development of new cultural and community facilities will be supported and should enhance the well-being of the local community, and the vitality and viability of centres.</p> <ul style="list-style-type: none"> • Major developments are required to incorporate opportunities for cultural activity, including through the interpretation of the heritage of the site and area. • The loss or change of use of existing cultural and community facilities will be resisted unless: <ul style="list-style-type: none"> - replacement facilities are provided on site or within the vicinity which meet the need of the local population, or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or - it has been demonstrated that there is no longer a community need for the facility or demand for another community use on site. • The temporary and meanwhile use of vacant buildings and sites by creative, cultural and community organisations will also 	

Ref.	Name/ Company	Comment	Council Response
		<p>be supported, particularly where they help activate and revitalise town centre locations and the public realm.</p> <ul style="list-style-type: none"> • Council will apply the ‘agent of change’ principle, whereby if a development would potentially result in conflict between a cultural activity and another use, especially in terms of noise, then the development responsible for the change must secure the implementation of appropriate mitigation. <p>For clarity, and so that guidelines are clear and consistent, the accompanying text and the Glossary should contain an explanation for the term ‘cultural and community facilities’. We recommend this succinct all-inclusive description which would obviate the need to provide examples: <i>cultural and community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.</i></p>	
018	Education and Skills Funding Agency	<p>The ESFA welcomes the opportunity to contribute to the development of planning policy at the local level.</p> <p>General Comments on the Local Plan Part 2 Approach to New Schools</p> <p>The ESFA notes that some growth in housing stock is expected in the borough over the plan period which will place additional pressure on social infrastructure such as education facilities. The Local Plan will need to be ‘positively prepared’ to meet the objectively assessed development and infrastructure requirements.</p>	<p>Comments noted.</p> <p>The Core Strategy in Policy CS15 ‘Health and Education’ supports development that will enable the provision of high quality new and improved education facilities, including the re-modelling, extension or rebuilding of schools in Blackpool.</p> <p>The allocation of additional school sites will be considered during the development of the Local Plan Part 2.</p>

Ref.	Name/ Company	Comment	Council Response
		<p>You will have no doubt taken account of key national policies relating to the provision of new school places, bearing in mind the requirement for Local Plans to be consistent with national policy, but it would be helpful if the NPPF was explicitly referenced within the document. In particular:</p> <ul style="list-style-type: none"> - The (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 72). <p>The ESFA supports the principle of Blackpool safeguarding land for the provision of new schools to meet government planning policy objectives.. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary.</p> <p>Blackpool should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on 'Planning for Schools Development' (2011) which sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system.</p> <p>The ESFA encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places. In</p>	

Ref.	Name/ Company	Comment	Council Response
		<p>line with the Duty to Cooperate, please add the ESFA to your list of relevant organisations with which you engage in preparation of the plan.</p> <p>Ensuring there is an adequate supply of sites for schools is essential and will ensure that Blackpool can swiftly and flexibly respond to the existing and future need for school places to meet the needs of the borough over the plan period.</p> <p>Site Allocations</p> <p>The ESFA supports the redevelopment of the former Arnold School site at Lytham Road following capital approval for the New Armfield Academy. The ESFA would welcome continued support within the Local Plan to safeguard this site for continued D1 (education) uses and that due consideration be given to the removal of the existing local listings to enable comprehensive redevelopment of the site for public benefit.</p> <p>The ESFA welcomes the list of proposed Development Management policy areas (para 4.1) that should be included within the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Document. We would request that a policy be included within the Community Facilities section to highlight the need to ensure that sufficient land is allocated to allow for the development of new schools and the expansion of existing schools, where necessary.</p> <p>The Core Strategy proposes housing growth of 4,500 dwellings over the plan period 2012-2027. The Local Plan Part 2 must therefore ensure that sufficient land is allocated for school uses to meet the needs of this housing growth, and robust forecasts</p>	

Ref.	Name/ Company	Comment	Council Response
		<p>must be used to identify the medium to long-term capacity requirements. The ESFA suggest that such forecasts be included within the published evidence base documents to support subsequent stages of the Local Plan.</p> <p>Developer Contributions and CIL One of the tests of soundness is that a Local Plan is 'effective' i.e. the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments. The ESFA note that Blackpool does not currently have any plans to introduce a CIL tariff, however, we would be keen to contribute to any wider review of developer contributions that may take place in the future. As such, please add the ESFA to the database for future CIL consultations.</p>	
019	JWT Leisure	<p>Highlights that limited forms of 'amusement centres' catering for adults provides a service appreciate and used by Blackpool shoppers. This use is different to the resort style amusement arcades.</p> <p>Want to ensure that any amusement arcade policy does not purport to cover amusement centre use and then either have a different policy like the existing BH18 or allow the consideration of applications for amusement centre use on their own merits.</p> <p>If the Council are to replace the current policy BH18 Amusement Centre, consideration should be given to widen the parts of the</p>	<p>The Council accepts that an Amusement Centre use is materially different to the Amusement Arcades that are typically found on the Golden Mile, for example.</p> <p>The Council will consider the need for a specific policy relating to Amusement Centre uses.</p>

Ref.	Name/ Company	Comment	Council Response
		Town Centre that this use is allowed as the current are too remote and lacking in pedestrian activity to effectively function.	
020	Lancashire County Council	<p>We are in broad agreement with the proposals presented within the Regulation 18 Scoping Document.</p> <p>The updated draft School Place Provision Strategy 17/18 to 19/20 consultation has recently closed. The document sets out how we intend to review the educational provision in Lancashire to ensure the right number of school places are in the right areas, at the right time to meet demand. Approval will be sought over the next couple of months and will be available on the Lancashire County Council Website when approved.</p> <p>The Strategy for the provision of school places and school's capital investment 2015/16 to 2017/18 provides the context and policy for school place provision and schools capital strategy in Lancashire. Over the coming years, Lancashire County Council and its local authority partners will need to address a range of issues around school organisation in order to maintain a coherent system that is fit for purpose, stable, and delivering the best possible outcomes for children and young people.</p> <p>Pressure for additional school places can be created by an increase in the birth rate, new housing developments, greater inward migration and parental choice of one school over another. If local schools are unable to meet the demand of a new development there is the potential to have an adverse impact on the infrastructure of its local community, with children having to travel greater distances to access a school place.</p>	Comments noted.

Ref.	Name/ Company	Comment	Council Response
		<p>In a letter from the DfE to all Chief Executives, the Minister of State for Housing and the Parliamentary Under Secretary of State for Schools jointly stated that 'where major new housing developments create an additional need for school places, then the local authority should expect a substantial contribution from the developer towards the cost of meeting this requirement'.</p> <p>The School Planning Team at Lancashire County Council produces an Education Contribution Methodology document which outlines the methodology for assessing the likely impact of new housing developments on school places, where necessary mitigating the impact, by securing education contributions from developers.</p> <p>In order to assess the impact of a development the School Planning Team consider demand for places against the capacity of primary schools within 2 miles and secondary schools within 3 miles. These distances are in line with DfE travel to school guidance and Lancashire County Council's Home to School Transport Policy.</p> <p>Planning obligations will be sought for education places where Lancashire primary schools within 2 miles and/or Lancashire secondary schools within 3 miles of the development are:</p> <ul style="list-style-type: none"> • Already over-subscribed • Projected to become over-subscribed within 5 years; or • A development results in demand for a school site to be provided <p>Comments on the Regulation 18 Scoping Document</p>	<p>Comments noted. We will consider the impacts of new housing sites on education provision as part of the development of the Local Plan Part 2. The IDP will be updated as part of the process.</p>

Ref.	Name/ Company	Comment	Council Response
		<p>The policy documents available on Blackpool Council's website included the Core Strategy, adopted 2016, the Infrastructure Delivery Plan 2014 and Core Strategy Policy Maps 2016. After reviewing these documents, and at this early stage of the local plan process, the information available requires further monitoring to understand the impact of strategic housing to be delivered within Blackpool and potentially into neighbouring districts and the impact across the education provision.</p> <p>The close boundary relationship of Blackpool with the districts of Wyre, and in particular Fylde has the potential to impact on the inward, and outward migration of mainstream school pupils across the districts. Monitoring allows us to understand the impact in mainstream education across the two districts understanding the travel of pupils and the preference of parents of one school over another.</p> <p>The strategic housing development at Whyndyke Farm is one development that cuts across the two districts working in partnership, and references are made regarding this development in the supporting documents. Currently discussions are ongoing with Fylde Council regarding the education provision to meet the demand of this development, including a proportion within the Blackpool boundary.</p> <p>The Infrastructure Delivery Plan (IDP) 2014 is an important part of the local plan, and sets out the infrastructure required to support housing growth. We request that Lancashire County Council School Planning Team are included in any consultations or updates to the IDP, ensuring we are able to make comment on any changes with the potential to impact on the</p>	

Ref.	Name/ Company	Comment	Council Response
		education provision within schools managed by Lancashire County Council.	
021	Natural England	<p>Overall as the plan progresses the Development Policies should take a strategic approach to the conservation, enhancement and restoration of the natural environment, and promote opportunities for the green infrastructure and recreational access as part of any development.</p> <p>Blackpool LPA needs ensure the plan considers the implications of the plan beyond the LPA boundary.</p> <p>Natural England would like to see more information within the environment section on how the natural assets will to be protected, conserved and enhanced and that this should be a key issue in the document as it evolves. Natural England would expect biodiversity and geodiversity, soils, priority habitats, ecological networks, protected species to be covered under the heading of the natural environment.</p> <p><u>Net Gain</u> Natural England encourages net gain. Net gain for biodiversity and for nature is enshrined within NPPF paragraphs 9, 109 and 152. It can be secured on an individual project basis but is best delivered spatially by embedding it into local plans (using a sound evidence base).</p> <p>Net gain projects should protect or buffer core sites, enhance connectivity or provide ecological stepping stones for species e.g. form part of local Green Infrastructure (GI) strategies.</p>	Comments noted.

Ref.	Name/ Company	Comment	Council Response
		<p>Net gain is achieved by auditing the existing biodiversity that a development will impact, establishing a numeric value for that biodiversity (ideally using the Defra metric) and then calculating how much additional biodiversity is needed to secure a net gain legacy.</p> <p>Ecological advice should always be sought when calculating net gain.</p> <p><u>Protected species</u> Protected species is referred to in the scoping document. Further Standing advice for protected species. Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.</p> <p><u>Recreational Pressure</u> It is recommended the LPA provide more detail as the plan emerges on how potential recreational pressure related issues will be addressed. This is connected with disturbance to foreshore bird populations connected with the Ribble and Alt Estuaries Special Protection Area and Ramsar site and Ribble Estuary Site of Special Scientific Interest. Natural England is interested in how development in Blackpool increases users of beaches and how impacts (alone or in-combination) will be avoided or mitigated.</p> <p>Natural England recommends including policies specifically regarding the provision of green/open space to be provided on site so it is close to where people live (as that's where most people will engage with the natural environment) but this also needs to sit as part of a wider network to enable people to fully uptake sustainable transport options and improve health</p>	

Ref.	Name/ Company	Comment	Council Response
		<p>through being more active. It is also recommended there is strong join up with neighbouring LPA's in terms of wider access provision.</p> <p><u>Transport</u> Under the transport section there is an opportunity to include a clear reference to the importance of green infrastructure here would set it alongside transport and other infrastructure explicitly and help stress the point that planning for green infrastructure is important to support new housing and growth development as is transport infrastructure.</p> <p><u>Infrastructure</u> It is recommended an infrastructure section is included with Sustainable Urban Drainage Systems (SUDS) to minimise flood risk that is a possible infrastructure issue, which could be included. Besides the use of SUDs, natural solutions to manage water within the built environment could also be acknowledged and/or included in the plan. The aim should be to encourage all developments to prioritise this approach because of the multiple benefits it can provide.</p> <p><u>Marton Moss</u> In terms of the Marton Moss and engaging with the community over a possible Neighbourhood Plan (NP), Natural England would require clarification as to what will happen if the local community do not want to progress a NP. It would also be useful for the Local Plan to set some principles on what needs to be achieved in this area to inform the NP process.</p> <p><u>Impact Risk Zones</u> Including Impact Risk Zones (IRZs) on the policy map would help when assessing impacts/risk with regards to development and</p>	

Ref.	Name/ Company	Comment	Council Response
		<p>designated sites. Catchment areas for watery designated sites will also help with assessing risks and opportunities.</p> <p>The Impact Risk Zones (IRZs) are a GIS tool which can help to make a rapid initial assessment of the potential risks posed by development proposals to: Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. They define zones around each site which reflect the particular sensitivities of the features for which the site is notified and indicate the types of development which could potentially have adverse impacts. Information about using the data can be found here. This tool is likely to be beneficial in early plan making and we recommend its use to identify impacts that require further consideration when assessing potential development sites for inclusion within the plan. Natural England is happy to provide further advice and support on the IRZs and can offer more detailed data sets on protected sites if required.</p> <p><u>Sustainability Appraisal Scoping</u></p> <p>Natural England welcomes the amendments that have taken place since the last version, particularly around objective 12: To protect, maintain and enhance green infrastructure, biodiversity and geodiversity, although it would be helpful to add more detail to the sub objectives specifically stating what is to be achieved from this objective.</p> <p><u>Monitoring and Indicators</u></p> <p>As set out in Planning Practice Guidance, you should be monitoring the significant environmental effects of implementing the DPD. This should include indicators for monitoring the effects of the SADPD on biodiversity (NPPF para 117).</p>	

Ref.	Name/ Company	Comment	Council Response
		<p>Whilst it is not Natural England's role to prescribe what indicators should be adopted, the following indicators may be appropriate.</p> <p>Biodiversity:</p> <ul style="list-style-type: none"> • Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance. • Percentage of major developments generating overall biodiversity enhancement. • Hectares of biodiversity habitat delivered through strategic site allocations. <p>Landscape:</p> <ul style="list-style-type: none"> • Amount of new development in AONB/National Park/Heritage Coast with commentary on likely impact. <p>Green infrastructure:</p> <ul style="list-style-type: none"> • Percentage of the city's population having access to a natural greenspace within 400 metres of their home. • Length of greenways constructed. • Hectares of accessible open space per 1000 population. 	
022	S Richmond	Supports the development of infill plots on Marton Moss in order to enhance the appearance of the area.	Support noted.
023	Sport England	<p>Welcomes the aim to provide policies in relation to Open land meeting community and recreational needs and community facilities.</p> <p>It would be useful to consider also including a site specific policy on key sports hubs and key playing field sites to deal with expansion/changes as well as seeking to allocate new playing field sites in line with the findings of the council's 2016 playing</p>	Comments noted. The Council will undertake as assessment of the Indoor Sports Facilities in due course.

Ref.	Name/ Company	Comment	Council Response
		<p>pitch strategy. It would be useful to also consider how you deal with lapsed and disused sites and any shortfalls identified in the strategy which will mean you need allocate sites for new playing fields/ sports facilities.</p> <p>Marton Moss CS26 - we note the general approach to further investigate where residential development may be acceptable but wish to remind the council this area contains two established sports clubs, South Shore Tennis Club and Squires Gate Football Club both with a range of facilities. Any plans to redevelop their sites should be done in compliance with para74 of the NPPF and we remind the council Sport England would be a statutory consultee on any subsequent application.</p> <p>Section 5 - The Council's recent 2016 playing pitch strategy should be listed under the evidence base. This is a key document setting out current and future needs for sport and has the buy in of all the pitch sports governing bodies. This will supersede the cited open space study on outdoor sports.</p> <p>Has the council done similar work on assessing the needs for indoor sports facilities? This again is a key part of the evidence base and should be used to help inform any site specific issues.</p>	
024	K Rooney	<p>I wish to comment on Marton Moss (paragraph 4.2) and feel that the current policy is too restrictive, particularly regarding development on infill sites.</p> <p>Communities Secretary, Sajid Javid recently said that the Government was determined to build homes 'in places where people wanted to live' in spite of local opposition to many new developments (July 2017). Therefore, adopting a blanket approach to planning decisions on Marton Moss seems too</p>	<p>The Core Strategy Policy CS26 was found sound by the Planning Inspector at Examination.</p> <p>Further work is being undertaken to develop a Neighbourhood Planning Approach for the area.</p>

Ref.	Name/ Company	Comment	Council Response
		<p>restrictive and should not be applied to potential infill sites in residential areas, which have lain fallow for many years, particularly when there are adjacent properties which would benefit from a well-planned development. There are very few small holdings on Marton Moss and hardly any households rely on agriculture for a living. This has been the case for several decades, so it seems unrealistic to limit development for agricultural or horticultural purposes only and reject applications which could benefit the local community.</p> <p>Further clarification is needed as to what is meant by the distinctive character of Marton Moss. Parts of Marton Moss are semi-rural in nature with attractive housing mingling in with the surrounding landscape. However, some land lays fallow, has not been used for agricultural purposes for decades and could be an easy target for vandals or fly tipping. To enhance the distinctive character, would it not be better to develop the fallow land, particularly in residential areas? Integrating well designed houses with existing properties would enhance the appearance of the environment and make neighbouring property owners feel more secure. Maintaining the status quo with the existing policies, is a deterrent to such developments and will only sustain an environment with derelict and potentially contaminated land which does not support section 16 of the Scoping Report which proposes to reduce this type of land. Furthermore, the Planning Practice Guide states that in order to promote healthy communities there should be “safe and accessible environments where crime, disorder, and fear of crime, do not undermine the quality of life or community cohesion.”</p>	

Ref.	Name/ Company	Comment	Council Response
		<p>There are already existing discrepancies regarding only allowing development for agricultural or horticultural use on Marton Moss. In 2014 the Council approved an application for a caravan site which included permission for static caravans, touring caravans and tents. Also in 2014, permission was granted for a car sales room on Marton Moss and there have been other instances when permission has been granted for dwellings or buildings which do not appear to have any relevance to agriculture or horticulture. Also, large parts of Marton Moss have been developed so it seems illogical that permission is not granted to infill sites in residential areas. This suggests that the council should not adopt such a restrictive approach to planning applications on Marton Moss, particularly in residential areas where there are current dwellings with access to the local amenities. This 'blanket approach ' to planning applications on Marton Moss seems to contradict the recommendation in The Planning Practice Guide regarding Rural Housing paragraph 001 which states "blanket policies restricting housing developments in some settlements from expanding should be avoided unless their use can be supported by robust evidence."</p> <p>If a planning application is lodged which will enhance the environment and have a positive impact on the quality of life of the neighbouring properties, it should be reviewed for its merits, rather than be rejected due to a blanket 'one size fits all' policy. Paragraph 197 of the Planning Practice Guide states: "Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work pro-actively with applicants to secure developments that improve the economic, social and environmental conditions of the area."</p>	

Ref.	Name/ Company	Comment	Council Response
		The current policy regarding Marton Moss needs reviewing and should be more receptive to infill developments which will not detract from the environment or surrounding properties. If the Marton Moss community prepares a Neighbourhood Plan, the community should keep an open mind and adopt a more positive approach to infill sites, in order to address the requirements for new developments in South Blackpool and allow developments which will enhance the area, before rejecting planning applications based on restrictive policies.	
025	K Beardmore	<p>The New Housing Development policy topic is somewhat vague and limited. The policy should provide specific allocations in accordance with the call for sites exercise in order to meet the housing requirement. The LPA also need to demonstrate how they will address a lack of performance in respect of their annual housing requirement over the plan period. Consideration should be given as to whether the housing requirement in the Core Strategy constitutes an objectively assessed housing need.</p> <p>The Council must also be able to discharge their Duty to Co-Operate, forming, as they do, part of the wider Fylde Coast Housing Market Area. This point is also made by the HBF in their submissions and we would agree with this comment.</p> <p>The Scoping Document in Section 3 refers to the Call for Sites Exercise. It may be that those countryside boundaries need to be reviewed as part of the Call for Sites exercise.</p>	<p>Comments notes.</p> <p>This Scoping Document sets out the ‘scope’ of the Local Plan Part 2 and did not intend to provide a lot of detail.</p> <p>The Draft Plan will provided the fully draft policies and proposed site allocations.</p> <p>The housing requirement set out in the Core Strategy was found sound by the Planning Inspector at Examination.</p> <p>The Duty to Cooperate process is ongoing and further engagement will take place with neighbouring authorities and other bodies as the Blackpool Local Plan Part 2 progresses.</p>
026	Gladman Developments	<p><u>National Planning Policy</u></p> <p>The National Planning Policy Framework (the Framework) sets out four tests that Local Plans must meet in order to found sound at examination. In this regard, we submit that in order to prepare a sound plan it is fundamental that the Plan is:</p>	<p>Comments noted.</p> <p>As the Local Plan Part 2 moves forward the Council will provide clarity on any policies that are no longer to be</p>

Ref.	Name/ Company	Comment	Council Response
		<ul style="list-style-type: none"> - Positively prepared The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. - Justified the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence base. - Effective the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and - Consistent with National Policy the plan should enable the delivery of sustainable development in accordance with the policies in the Framework. <p>Whilst recognising that this consultation is one of the first stages in plan preparation, the Council will need to consider whether the saved Local Plan policies are consistent with the requirements of the Framework. The saved Local Plan policies were prepared in accordance with a previous era in national policy and as such may need to be revisited to ensure consistency with the Framework. Going forward, the Council will need to provide clarity on which policies will no longer be progressed and which policies will be replaced through the LPP2.</p> <p><u>New Housing Development</u> Although the information is limited, this policy topic identifies the possibility of introducing requirements for new housing development such as including floor space standards. It is important that any policies introduced through</p>	<p>progressed and set out where new policies replace saved policies.</p> <p>Consideration is being given to the incorporation of the optional nationally described space standards in a policy in Part 2 of the Local Plan. The inclusion of the standards will be subject to viability considerations and based on evidence.</p> <p>Further clarity on housing provision for older people will be provided in the proposed policy and supporting text.</p> <p>Further clarity on the approach to custom/self-build will be provided in the proposed policy and its supporting text.</p> <p>The Duty to Co-operate process is ongoing and engagement will take place with neighbouring authorities and other relevant bodies throughout the Blackpool Local Plan Part 2 preparation process.</p> <p>Sustainability appraisal will be undertaken during the preparation of the Local Plan Part 2 to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.</p>

Ref.	Name/ Company	Comment	Council Response
		<p>the LPP2 are supported by proportionate and robust evidence to justify their inclusion within the Plan.</p> <p>Furthermore, it is important that any policies relating to the construction of homes fully accord to the requirements of paragraph 173 of the Framework and do not place unsubstantiated policy burdens that may threaten the deliverability of sustainable growth opportunities.</p> <p><u>Housing for Older People</u> In principle, we support the Council in setting a criteria based approach for assessing proposals for housing with care and for older people. Importantly, any future policy must provide a supportive and flexible framework to complement existing housing stock whilst avoiding placing pressure on market housing supply.</p> <p><u>Self-Build</u> Gladman would welcome the addition of a policy in relation to self-build housing within the LPP2. This would be in line with current government thinking and objectives and should be supported by robust evidence of need. It is key that the development industry are able to understand the implications of any such policy requirement, to assist with the design of schemes and the consideration of financial viability.</p> <p>Gladman recommend that any policy requirement in relation to self-build housing has an element of flexibility built in to allow for negotiation over self-build plots on the basis of viability to ensure that site delivery is not delayed or prevented from coming forward. Any specific requirement to include self-build plots should be tested through the Council's viability assessment of the LPP2 to ensure that the cumulative</p>	

Ref.	Name/ Company	Comment	Council Response
		<p>impacts of all proposed proposed local standards and policy requirements do not put the implementation of the Plan as a whole at risk.</p> <p>Further to this, Gladman urge the Council to ensure the policy has added flexibility as there is no guarantee that this form of housing will be delivered and there may be situations when they are difficult to deliver which may result in the non-delivery of otherwise suitable land for housing. Therefore, Gladman recommend that any policy specific requirement needs to include a mechanism whereby if the self-build plots are not taken up within a given time period then these revert back to market housing to be provided as part of the wider scheme. This would provide flexibility and help to ensure that the required housing is delivered.</p> <p>Legal Requirements <u>Duty to Cooperate</u> The Duty to Cooperate (DtC) is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2003, as amended by Section 110 of the Localism Act. The DtC requires local planning authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues through the process of plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination, the 2013 Mid Sussex Core Strategy Examination and the recent St Albans Local Plan Examination, if a Council fails to satisfactorily discharge its DtC a Planning Inspector must recommend non-adoption of the Plan. This cannot be rectified through modifications.</p>	

Ref.	Name/ Company	Comment	Council Response
		<p>Gladman recognise that the DtC is a process of ongoing engagement and collaboration as set out in the PPG it is clear that the Duty is intended to produce effective policies on cross boundary strategic matters. In this regard, the Council must be able to demonstrate that it has engaged and worked with its neighbouring authorities, alongside their existing joint work arrangements, to satisfactorily address cross boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation to ensure that the Housing Market Area’s housing needs are met in full.</p> <p>The Council’s ability to fulfil the DtC is fundamentally vital to securing the soundness of the plan. In order to meet the DtC the Council should effectively engage with neighbouring authorities to meet any unmet housing needs in the HMA and vice versa. This is particularly important given that Blackpool forms part of the wider Fylde Coast Housing Market Area, and may need to assist neighbouring authorities in meeting unmet housing needs.</p> <p>The Council should ensure that it is able to demonstrate what steps have been taken at each stage of plan preparation to ensure that the plan has been subject to ongoing and effective cooperation with any interested parties to which a strategic cross boundary issue, such as unmet housing needs, may effect. This will require extensive and ongoing meaningful cooperation by both officers and members to ensure the Duty is met in full.</p> <p><u>Sustainability Appraisal Scoping</u></p>	

Ref.	Name/ Company	Comment	Council Response
		<p>The Sustainability Appraisal (SA) scoping report represents the first phase of undertaking the SA. Whilst at this stage Gladman have only minor comments in relation to the SA process, we look forward to reviewing the outcome of the Council's assessments in the future and analysing whether these are based on fair and robust assumptions.</p> <p>Under Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to SA. Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.</p> <p>The Council should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Council's decision making and scoring should be robust, justified and transparent.</p> <p>Gladman remind the Council that there have now been a number of instances where the failure to undertake a satisfactory SA has resulted in plans failing the test of legal compliance at Examination or being subjected to legal challenge. There are also numerous examples where deficiencies with SAs have led to timely suspensions of EiPs whilst Councils ensure that the SA regulations have been adequately met.</p>	

Ref.	Name/ Company	Comment	Council Response
		<p>Gladman would like to take the opportunity to remind the Council how a justified and adequate SA should be undertaken to inform the policies and allocations made through the Local Plan. This should not be a cursory exercise, but should be a fundamental part of the plan preparation process and should help to inform the decisions made by the Council. In light of experiences in other authorities, the Council need to ensure that the policy choices in the LPP2 are clearly justified by the results of the SA process. Specifically, it should be clear from the SA process why some policy options have been progressed and others rejected.</p> <p>In accordance with the Environmental Assessment of Plans and Programmes Regulations 2004, the Council must take account of all reasonable alternatives when assessing and selecting their preferred policy choice. It is integral that each reasonable alternative is assessed to the same degree of detail as the authority's preferred option, should only be rejected after a fair and comparable assessment of its sustainability credentials.</p> <p>The Council should not seek to progress a pre-determined strategy that unjustifiably influences the assessment process. The SA needs to be undertaken in a clear and transparent manner.</p>	
027	United Utilities	United Utilities seek to work closely with the Council during the Local Plan process to develop a coordinated approach for delivering sustainable growth in sustainable locations.	Comments noted. Consideration will be given to including a specific surface water policy and local infrastructure policy as part of the development of the Local Plan Part 2.

Ref.	Name/ Company	Comment	Council Response
		<p>New development should be focused in sustainable locations which are accessible to local services and infrastructure. United Utilities will continue to work with the Council to identify any infrastructure issues and appropriate resolutions throughout the development of the Local Plan.</p> <p>Site Allocations - It is acknowledged that alongside the consultation on the SADMPD, the Council are also running a Call for Sites exercise. We understand Officers will be required to consider the allocation of a large number of potential development sites as part of the emerging SADMPD. The Council is aware from past discussions with colleagues that a fuller understanding of the impact on wastewater infrastructure can only be achieved once more details are known, such as timescales for development, the approach to surface water management and the chosen points of connection. On receipt of more information it may be that we can provide more detailed comments regarding the sites which are being promoted as draft allocations. The assessment of impact on our infrastructure is an ongoing process as a range of details become available.</p> <p>Additional information in respect of development sites is often only available at the planning application stage. With this information we will be able to better understand the potential impacts of development on infrastructure and, as a result, it may be necessary to coordinate the delivery of new development with the timing for the delivery of future infrastructure improvements.</p> <p>SPECIFIC COMMENTS Surface Water Drainage</p>	

Ref.	Name/ Company	Comment	Council Response
		<p>Whilst it is recognised that Policy CS9 of the adopted Core Strategy (Water Management) does reference surface water drainage, United Utilities recommends that the Council includes an additional policy in the emerging Local Plan dedicated to surface water management.</p> <p>We suggest the following draft policy is included: <i>“Surface water should be discharged in the following order of priority:</i></p> <ol style="list-style-type: none"> <i>1. An adequate soakaway or some other form of infiltration system.</i> <i>2. An attenuated discharge to watercourse.</i> <i>3. An attenuated discharge to public surface water sewer.</i> <i>4. An attenuated discharge to public combined sewer.</i> <p><i>Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available.</i></p> <p><i>Approved development proposals will be expected to be supplemented by appropriate maintenance and management regimes for surface water drainage schemes.</i></p> <p><i>The preference will be for new development to include genuine sustainable drainage systems as opposed to underground tanked storage systems for surface water.</i></p> <p><i>On large sites it may be necessary to ensure the drainage proposals are part of a wider, holistic strategy which coordinates the approach to drainage between phases, between developers, and over a number of years of construction. The applicant will be expected to include details of how the approach to drainage on a phase of development has regard to interconnecting phases within a larger site.</i></p>	

Ref.	Name/ Company	Comment	Council Response
		<p><i>Infrastructure should be sized to accommodate flows from interconnecting phases and drainage strategies should ensure a proliferation of pumping stations is avoided on a phased development. On greenfield sites, applicants will be expected to demonstrate that the current natural discharge solution from a site is at least mimicked.</i></p> <p><i>On previously developed land, applicants should target a reduction of surface water discharge in accordance with the non-statutory technical standards for sustainable drainage produced by DEFRA. In demonstrating a reduction, applicants should include clear evidence of existing positive connections from the site with associated calculations on rates of discharge.</i></p> <p><i>Landscaping proposals should consider what contribution the landscaping of a site can make to reducing surface water discharge. This can include hard and soft landscaping such as permeable surfaces. In seeking to most appropriately manage the impact of surface water run-off, developers will be expected to include permeable materials. These measures are particularly important in a town like Blackpool which has an unusual drainage system where many surface water sewers and watercourses connect with the combined sewerage system, either directly or indirectly. The treatment and processing of surface water is not a sustainable solution.</i></p> <p><i>Surface water should be managed at source and not transferred. Every option should be investigated before discharging surface water into a public sewerage network. A discharge to groundwater or watercourse may require the consent of the Environment Agency.”</i></p>	

Ref.	Name/ Company	Comment	Council Response
		<p>New development should manage surface water run-off in a sustainable and appropriate way. This approach is in accordance with paragraph 103 of the NPPF.</p> <p><u>Infrastructure Provision</u></p> <p>Whilst it is acknowledged that infrastructure provision is referenced within adopted Core Strategy Policy CS11 (Planning Obligations), we consider the SADMPD should include a specific policy in relation to local infrastructure provision.</p> <p>As detailed above, in some instances it may be necessary to coordinate infrastructure improvements with the delivery of development. In accordance with paragraphs 156 and 162 of the National Planning Policy Framework (NPPF), we recommend the following detailed policy is included as part of the emerging Local Plan in relation to infrastructure provision:</p> <p><i>“Once more details are known on development sites, for example the approach to surface water management and proposed connection points to the foul sewer network, it may be necessary to coordinate the delivery of development with timing for the delivery of infrastructure improvements.”</i></p> <p>With respect to larger development sites, which can be developed in an uncoordinated and fragmented manner dictated by random land ownership boundaries, we recommend the following:</p> <p><i>“At the larger development sites, it may be necessary to ensure that the delivery of development is guided by strategies for</i></p>	

Ref.	Name/ Company	Comment	Council Response
		<p><i>infrastructure which ensure co-ordination between phases of development over lengthy time periods and by numerous developers.</i></p> <p><i>The Council will support the principle of investment in infrastructure to respond to development and environmental needs. Infrastructure is key to the delivery of sustainable development and economic growth and meeting the development needs of the Borough.”</i></p> <p>With regards to large sites, United Utilities wishes to highlight the challenge that is often presented by fragmented ownership. Whilst masterplans often aspire to secure the delivery of development in a coordinated and holistic manner, this is often a major challenge in practice.</p> <p>We encourage the Council to carefully consider the deliverability issues and practical issues associated with sites in fragmented ownership. On such sites, we would strongly encourage the council to challenge the site promoters to present a clear site wide infrastructure strategy.</p> <p>On larger sites, it should be clearly demonstrated there is a formal mechanism in place which will ensure the landowners will work together to deliver a coordinated approach to infrastructure over the whole site. This is a key element of delivering sustainable development and is in the best interests of good planning and deliverability.</p> <p>Whilst we appreciate the Council has yet to identify any potential development sites as part of the Local Plan process, we strongly recommend this is addressed in advance of allocating specific sites.</p>	

Ref.	Name/ Company	Comment	Council Response
		<p><u>Water Efficiency</u></p> <p>We note that Policy CS9 (Water Management) ensures that new development incorporates water efficiency measures. United Utilities wishes to highlight the importance of incorporating water efficiency measures as part of the design process for all new development. There are various methods that developers can implement to ensure their proposals are water efficient, such as utilising rainwater harvesting and greywater harvesting for example.</p> <p>Improvements in water efficiency help to reduce pressure on water supplies whilst also reducing the need for treatment and pumping of both clean and wastewater. Water efficiency measures contribute to the delivery of sustainable development.</p> <p><u>Health and Well-Being</u></p> <p>In respect of health, well-being and maximising the quality of residential amenity, United Utilities wishes to highlight that it is more appropriate to locate sensitive uses (such as residential) away from existing sources of pollution (e.g. noise and odour)</p> <p>In the site selection process, we feel it is important to highlight that new development sites are more appropriately located away from our existing operational infrastructure. This is particularly relevant to our wastewater treatment works which can be considered a ‘bad neighbour’.</p>	

Ref.	Name/ Company	Comment	Council Response
028	Councillor P Galley	<p>Looking at the environmental policies they only seem to make reference to new developments providing new or improved open space.</p> <p>Improving the environment of the Borough, particularly the Town Centre and inner areas through creating “open space” is impossible as there is very limited room to develop. Maybe we should be concentrating more on making new development create more greenspace, rather than open space. Rather than trying to create new open spaces where there is no room to, we could look at encouraging innovative design like roof gardens, or something like the living wall at Manchester Deansgate. Simply having greenspace to look at rather functional greenspace has been known to have massive mental health benefits for the resident population. They will also help to create a sense of pride in the buildings from the residents, and as a “sense of civic pride” is one of the points in the Spatial Vision for Blackpool in the adopted Core Strategy then this will tie in.</p> <p>Also, looking at SPG11 open space in new developments, I have to question why it is only new development that warrants contributions for open space improvements? As a significant amount of the development in central Blackpool comes through the conversion and sub division of old buildings (Blackpool Council Housing Monitoring Report 2016), then can we have a policy that states that they have to provide some kind of innovative green design or for financial contributions to help the Council provide these? They are the biggest source of residential development in the Town Centre so they should have to contribute more.</p>	<p>It has been proven unviable in the Inner Area to request contributions for Affordable Housing and there any other contributions would impact on the deliverability of any schemes in the inner area.</p>

Ref.	Name/ Company	Comment	Council Response
029	Home Builders Federation	<p>The range of policies generally appears appropriate. The Council will need to provide clarity where new policies within Part 2 of the Local Plan replace other saved policies.</p> <p><u>New Housing Development</u> The further information upon this policy indicates that it will identify; "...requirements for new housing development including floorspace standards". It is important that the policy provides a supportive framework for housing development and does not seek to place additional burdens and barriers to delivery within Blackpool. This is particularly important due to the under-delivery which has occurred over the early years of the Local Plan, albeit it is acknowledged there are encouraging signs of increased delivery since 2014/15.</p> <p>The Council will also be aware of the 'housing delivery test' suggested in the Government's recent Housing White Paper. This will require action to be taken if delivery falls below 95% of the Council's annual housing requirement over a rolling 3 year period. The Council will need to consider the implications of this delivery test and identify appropriate actions and trigger points.</p> <p>The further information section refers to 'floorspace standards', it is unclear whether or not this relates to the optional nationally described space standards (NDSS). To implement the NDSS the Council will need to comply with the evidence requirements set out within the national Planning Practice Guidance (PPG), particularly ID 56-020. The PPG is clear that the NDSS are to be imposed on a 'need to have' basis rather than 'nice to have'. The evidence required by the PPG does not appear to be included in the evidence base list at paragraph 5.2 of the consultation document. The Council will also need to consider the recent</p>	<p>Comments noted.</p> <p>The Council will provide clarity where new policies within Part 2 of the Local Plan replace other saved policies.</p> <p>Consideration is being given to the incorporation of the optional nationally described space standards in a new housing development policy in Part 2 of the Local Plan. The inclusion of the standards will be subject to viability considerations and based on evidence.</p> <p>The implications of the suggested housing delivery test will be taken account of as part of the approach to housing delivery in Part 2 of the Local Plan.</p> <p>Further clarity on housing provision for older people will be provided in the proposed policy and supporting text.</p> <p>Further clarity on the approach to custom/self-build will be provided in the proposed policy and its supporting text.</p> <p>Further detail on design policy will be provided in the Local Plan Part 2. Additional policy or policies dealing with design will complement the approach taken in Core Strategy Policy CS7 'Quality of Design' which includes support for contemporary and innovative expressions of design, where appropriate.</p> <p>Work is currently being undertaken to develop a Neighbourhood Planning Approach for Marton Moss</p>

Ref.	Name/ Company	Comment	Council Response
		<p>commentary within the Government’s Housing White Paper which confirms its intention to review the NDSS. The White Paper stated (paragraph 1.55);</p> <p>“...the use of minimum space standards for new development is seen as an important tool in delivering quality family homes. However the Government is concerned that a one size fits all approach may not reflect the needs and aspirations of a wider range of households. For example, despite being highly desirable, many traditional mews houses could not be built under today’s standards. We also want to make sure the standards do not rule out new approaches to meeting demand, building on the high quality compact living model of developers such as Pocket Homes. The Government will review the Nationally Described Space Standard to ensure greater local housing choice, while ensuring we avoid a race to the bottom in the size of homes on offer...”</p> <p>The Council should also consider the impacts that the introduction of the NDSS would have upon housing mix, viability and affordability. Given the current issues with viability and the significant need for affordable housing within Blackpool the HBF does not consider that the introduction of the NDSS would be justified. Further commentary will be provided upon this issue at later stages of consultation if the Council is to pursue the introduction of the NDSS.</p> <p><u>Housing for older people</u></p> <p>The HBF is supportive of the provision of housing for older people. It is, however, important that this compliments rather than burdens the mainstream market supply. It is therefore recommended that clarity is provided upon the range of products included which the Council consider would meet this</p>	<p>and the Council is actively engaging with the local community to move the process forward.</p>

Ref.	Name/ Company	Comment	Council Response
		<p>need as well as providing a supportive framework for such provision rather than placing burdens on all housing sites.</p> <p><u>Custom/ Self Build</u> The HBF is supportive of custom / self-build where it provides genuine additionality to the supply. It is therefore recommended that any policy provides a supportive framework for the delivery of such dwellings without harming other sources of supply. The HBF would not support an arbitrary requirement for custom / self-build plots on all new housing developments due to the consequential impacts upon viability and potential to slow delivery.</p> <p><u>Design</u> Good design is an essential component of any successful development. Design policies whilst providing a framework should not be unduly prescriptive as this will minimise the opportunities for innovative design and for developers to take account of site characteristics and viability considerations.</p> <p>The HBF is a partner in Building for Life 12 (BfL12). This provides a useful reference for discussion upon design. Whilst developments can be scored against the BfL12 criteria a mandatory level of achievement would not supported. The reason for this is that some developments may not be able to meet certain criteria simply due to their location or site characteristics.</p> <p><u>Marton Moss</u> It is important that the development of this site is not held back pending decisions upon whether a neighbourhood plan is to be developed. The HBF therefore considers that the Council must</p>	

Ref.	Name/ Company	Comment	Council Response
		<p>actively engage and manage the timely production of a positively framed neighbourhood plan or develop its own policy if no such plan is forthcoming.</p> <p>The scoping document identifies a number of evidence base documents which are either to be updated or produced. The HBF agrees with this list. It is however likely, dependent upon the policies identified within the plan, that other evidence base documents may be required. Without specific detail of the policy content it is difficult to identify the extent of any further evidence base requirements.</p> <p>The HBF would also anticipate to see an update upon how the Council has, and intends to continue, to discharged its requirements under the Duty to Co- operate. This is particularly important in terms of housing delivery where Blackpool forms part of the wider Fylde Coast Housing Market Area.</p>	
030	CPRE	<p>Call for sites</p> <p>The National Planning Policy Framework, 2012 (NPPF) does require local planning authorities to encourage developers to use brownfield land in advance of green fields. It states local plans can adopt a target to make policies more effective. CPRE recommends that Blackpool Council does adopt a target for brownfield reuse. Previously the North West Regional Spatial Strategy had a target of 65%, so we suggest this or higher, so that Blackpool can achieve its regeneration ambitions.</p> <p>CPRE suggests that the data on sites previously recorded on the National Land Use Database (latest record showed just over 60</p>	Comments noted.

Ref.	Name/ Company	Comment	Council Response
		<p>hectares, a third suitable for housing) is used in addition to the sites recorded on the pilot Brownfield Sites Register (which records just under 50 hectares, and 2,347 dwellings). CPRE is aware that the Brownfield Registers only relate to 'viable' sites, thus some brownfield may be 'hidden' off the database. We also seek transparency in terms of viability assessments where developers claim land is unviable.</p> <p>Policy list</p> <p>CPRE Broadly agrees with the list of policies. In addition, CPRE encourages specific policy for:</p> <ul style="list-style-type: none"> • <i>Green Belt land</i> Where possible new areas of Green Belt should be created and designated land should be protected from inappropriate development. Specific reference to the purpose of Green Belt in keeping land permanently open is important to refer to. Green Belt land should not be easily sacrificed, <i>once it is gone, it is gone forever;</i> • <i>Brownfield land</i> A locally derived brownfield target should be adopted to effectively promote its reuse as a priority; • <i>Landscape policy</i> The retention of important elements such as dark skies, tranquillity, trees, and hedgerows should be specified, as well as good design to help preserve local distinctiveness in building styles and materials. Specific reference to cumulative harm should be included, specifically regarding wind development, and 	

Ref.	Name/ Company	Comment	Council Response
		<p>small extensions and changes to properties, which can cause built intrusions into otherwise untouched rural landscapes.</p> <ul style="list-style-type: none"> • <i>Affordable Homes</i> Rural settlements do need homes where supported by evidenced, but importantly it must be affordable, to enable balanced communities for the future. • <i>Environmental Policy</i> Environmental designations should be protected. <p>Marton Moss CPRE agrees that Marton Moss is an important area that does need additional planning policy protection to ensure its continued protection and enhancement in the future. CPRE is an advocate of neighbourhood planning to ensure community engagement in decisions that affect them and their local area. However, we also acknowledge that not all communities are willing to take on what first appears to be a daunting task, without adequate skills to progress the draft policy through to referendum. CPRE can offer support to local communities to engage with Neighbourhood Plans. In the absence of a Neighbourhood Plan, CPRE supports the coverage of the Marton Moss area by a specific chapter in the Local Plan Part 2.</p>	
031	Environment Agency	<p>Due to updates, the Council should be aware that our Flood Map for Planning may have changed.</p> <p>Should any new or previously allocated undeveloped sites (which are to be carried forward as part of the Local Plan: Part</p>	Comments noted.

Ref.	Name/ Company	Comment	Council Response
		<p>2) fall within Flood Zone 2 or Flood Zone 3, a Level 2 Strategic Flood Risk Assessment will need to be carried out to justify those allocations.</p> <p>We recommend that a flood risk policy is included, to cover both site allocations and windfall sites, to ensure that no inappropriate development is permitted in Flood Zone 2 or 3, and that flood risk is not increased elsewhere as a result of the development. The policy could identify any general and/or site-specific mitigation measures that may be necessary.</p> <p>Policies relating to bathing water quality and sustainable drainage systems (SUDs) are not mentioned in the scope of the Local Plan: Part 2. Water quality is a key issue for the Blackpool borough which can be addressed through suitable development management policies to complement Policy CS9: Water Management of the Core Strategy.</p> <p>We recommend a detailed SUDS policy to cover site allocations and windfall sites is included, as SUDs are multifunctional and be used to reduce impacts on water quality in addition to regulating surface water run-off. Green infrastructure can also be incorporated into this policy.</p> <p><u>Contaminated land</u></p> <p>We recommend that a development management policy is included to ensure that there is no risk of pollution to controlled waters from land contamination on previously developed sites.</p> <p><u>Call for sites</u></p> <p>We wish to be consulted on any proposed site allocations which may come forward as part of the call for sites, if they fall within our remit.</p>	

Ref.	Name/ Company	Comment	Council Response
		<p>SUSTAINABILITY APPRAISAL SCOPING REPORT</p> <p>Generally, we are pleased to see most of our recommendations have been included in the updated SA report, however the following should be considered:</p> <p><u>Flood risk</u></p> <p>We note that flood risk is only considered under the Climatic Factors and Energy section. We recommend that this approach is revised as some areas are at risk of flooding without climate change being taken into consideration. This includes areas near the Central Pier and Anchorsholme.</p> <p>In our previous response dated 10 February 2017 (Ref: NO/2012/103892/SE -01/SP1-L01) we recommended that flood risk should be considered under the Water section.</p> <p><u>Additional comments</u></p> <p>Table 7-1 SA Objectives, Indicators and Targets (page 36)</p> <p>15. To protect and enhance the quality of water features and resources and to reduce the risk of flooding - The indicator "Distribution of areas at risk of fluvial flooding (Environment Agency)" should also include tidal flooding.</p> <p>As previously mentioned, an objective should be included in relation to encouraging the use of SUDS. SUDs are multifunctional and afford other benefits than providing mitigation for climate change.</p>	
032	Councillor M Smith	1. Proper bin storage to be considered when planning application are submitted and considered.	Comments noted. All will be considered as part of the development of Part 2.

Ref.	Name/ Company	Comment	Council Response
		<p>2. Application for properties with more than one unit should have their own letter box.</p> <p>3. Planning application over a certain value should contain a social value condition with in the application.</p>	
033	Fylde Borough Council	<p>There appeared to be some issues that are highlighted by the SA Scoping Report which could be covered by policies in the Local Plan Part 2, however, they are actually covered by policies in the adopted Core Strategy.</p> <p>It would be useful, given the two document approach if there was a list of the Core Strategy Policies in the Local Plan Part Two, for cross reference.</p> <p>Page 24 of the SA Scoping Report refers to high levels of household waste production, it is assumed that policy wording will be included on sustainable sourcing and waste management principles. Waste Management principles could be included in the Design Policy.</p> <p>With respect to sustainability, Blackpool is a large urban area which does have potential for Decentralised Energy Networks and District Heating Systems. Page 32 of the SA Scoping Report does highlight that a high proportion of houses do not have central heating, policy wording could be included to address this issue.</p> <p>With respect to the SA Scoping Report on page 28 the final sentence should say – Opportunity to strengthen Blackpool’s role as a sub -regional hub for the Fylde <u>Sub Region</u>. Also the Fylde Local Plan should be mentioned in the summary of Local</p>	<p>Comment noted.</p> <p>The Council will provide a list of Core Strategy policies in Part 2 for ease of cross reference.</p> <p>The Council will consider waste management principles in the development of any design policy.</p>

Ref.	Name/ Company	Comment	Council Response
		Plans, this plan is relevant because it allocates employment land to meet Blackpool's needs and it allocates land for development adjacent to Blackpool's administrative boundary.	
034	I Bagot	<p>Fully agrees with the proposed list of policies. The Town needs change that will benefit all residents, businesses and visitors to boost Blackpool's economy.</p> <p>We must get this project right to protect and encourage every person's future.</p> <p>Comments that Lytham Road is an eyesore. Shops closed poor quality canopies and properties.</p> <p>Action should be taken against Landlords to ensure properties are of a decent standard. The town needs decent living accommodation to house people that are struggling and need a place to live.</p> <p>Bring life back to all areas we know need attending to.</p>	Support noted.
035	M Richardson	<p>Offers no suggested development sites.</p> <p>Support all forms of public transport and agrees with the principles of section 4.1 – Transport GDR</p> <p>It is essential that no development is allowed on any existing transport corridor, notably Waterloo Road through to Bonny Street. Also it is desirable that any future development of the current police station site does not prevent future use of the central area for a tramway connection or shuttlebus route to the football ground and Waterloo Road of by the extension of the south fylde line by said length if made possible.</p>	Comments noted.

Ref.	Name/ Company	Comment	Council Response
		<p>When considering infill developments, close to existing transport facilities, there should be a presumption against on-site parking.</p> <p>Also there should be consideration of 'accumulation' of 'pressure' on existing transport corridors through developments added on to those properties already existing. A good example is the two junctions of Langdale road with Clifton road.</p>	

Appendix D: Copy of consultation notification sent by email and letter

Date: 10th January 2019

Name

Address Line 1
Address Line 2
Address Line 3

Our Ref: LPP2-Inf Cons

Direct Line: 01253 476239

Email: planning.strategy@blackpool.gov.uk

Dear Sir / Madam

**BLACKPOOL LOCAL PLAN 2012-2027
PART 2: DRAFT SITE ALLOCATIONS & DEVELOPMENT MANAGEMENT POLICIES
INFORMAL CONSULTATION PAPER**

We would like to invite your comments on the **Blackpool Local Plan Part 2: Draft Site Allocations and Development Management Policies – Informal Consultation Paper**

The Local Plan Part 2 is a key planning document for Blackpool and will:

- Allocate sites for new development including housing, employment and retail and identify areas for safeguarding and protection e.g. public open space, greenbelt
- Designate areas where particular policies will apply e.g. local centres
- Include policies to be applied when considering applications for development e.g. design, amenity and transport

We are now undertaking an informal consultation on our Draft Site Allocations and Development Management Policies to gain an early understanding of what you think of our initial site selections and policies.

Consultation is taking place until 5pm Thursday 21st February 2019

The Informal Paper and other supporting documents including draft evidence base documents are available to view and comment on at the Council's Customer First Centre, all Blackpool's libraries and at: www.blackpool.gov.uk/localplanpart2

If you have any questions about the Local Plan Part 2 please do not hesitate to contact the Planning Strategy Team on 01253 476239.

Yours faithfully

**Ms E Jane Saleh
Head of Planning Strategy**

Appendix E: Social Media examples

The screenshot shows a Facebook post from Blackpool Council. The browser address bar at the top reads 'ps://www.facebook.com/bpoolcouncil'. The page header includes the Blackpool Council logo and the name 'Blackpool Council'. The post itself is dated 'January 11 at 10:00 AM' and contains the following text: 'A 6 week public consultation has begun ¹⁴ The Local Plan is an important document that will affect all residents across Blackpool. Have your say on site allocations for new developments and where policies will be applied. For more information visit: www.blackpool.gov.uk/localplanpart2'. Below the text is a photograph of five people sitting on the floor, each holding a large, colorful speech bubble (grey, pink, orange, blue, and red) in front of their face. The post has 2 likes, 1 comment, and 2 shares. The interaction bar shows 'Like', 'Comment', and 'Share' buttons. The left sidebar of the Facebook page is visible, showing the Blackpool Council profile information and navigation menu.

This is a close-up view of the Facebook post content. It features the Blackpool Council logo and the text: 'Blackpool Council @BpoolCouncil · Jan 11 A 6 week public consultation has begun ²¹ The Local Plan is an important document that will affect all residents across Blackpool. Have your say on site allocations for new developments and where policies will be applied. For more information visit: blackpool.gov.uk/localplanpart2'. Below the text is the same photograph of five people sitting on the floor holding large speech bubbles. At the bottom of the image, there are icons for 1 like and 2 hearts.

Appendix F: Local Newspaper Reports

Gazette Article – 16th Jan 2018

These are the 22 sites earmarked for Blackpool housing developments

HAVE YOUR SAY

Twenty two sites for house-building have been identified in Blackpool as part of a new blueprint for future development.

Residents are being urged to have their say on the town's Local Plan which sets out proposals for the next eight years including the need to build hundreds of additional homes and changes to the green belt.

The former National Savings site off Preston New Road is earmarked for 90 homes. Rules have also been updated on policies such as those which govern so called 'garden grabbing' and for the protection of open space. Town centre designations are also set to be updated to make it easier for bars to open in streets once earmarked only for shops.

The Local Plan allocates land use until 2027 and is a vital tool for town hall planners when considering applications for development. A council report says: "Each stage presents an opportunity for the community and other stakeholders to be involved in choosing the right planning policies for Blackpool, and identifying sites for development or protection."

It adds: "Without its progress, acquisition, land assembly and planning approval for key regeneration and development projects will be undermined and delayed." The current proposals are subject to change in the wake of public comments, with further publication of the blueprint expected in the summer.

The proposals are available to view in all Blackpool's libraries and at the Customer Care Centre on Corporation Street. People can also go to the council's website to see the plans.

They have until February 19 to submit their comments.

Here are some of the main elements of the eight-year vision.

Housing

A total of 22 potential sites for housing development have been identified ranging from small parcels of land to council-owned offices. Sites include the former Bispham High School and land off Regency Gardens which has the potential for 274 new houses. Around 200 homes are planned for Grange Park, while the Rigby Road tram depot is potentially earmarked for 100 houses if ambitions to relocate to a new base are realised although this would be in the long-term. Around 150 town centre apartments are also set out in the plan.

Blackpool has a requirement for 4,200 new homes between 2012 and 2027, but many have already been built or have received planning permission, leaving provision for 820 homes still required.

Sites are also set out for travellers and travelling showpeople on land off Faraday Way in Bispham.

Town Centre

The primary area where shops will be concentrated continues to be defined as Houndshell, Victoria Street and some parts of Bank Hey Street, with the priority remaining as retail and cafe/restaurant

use. However the new plan is set to remove designated zones which will allow pubs and bars to open in more parts of the town centre. The report says it is hoped this will “strengthen those areas of the town centre which are currently struggling with concentrations of vacant property some of which are long term.” However ‘vertical drinking’ bars will continue to be discouraged using licensing rules, with town hall chiefs likely to look more favourably on seated venues such as wine and cocktail lounges.

Local centres

Amendments are being made to some of the neighbourhood centres in order to help reduce the number of empty premises in areas where there are high levels of long term vacancies. It is proposed to remove Bond Street in South Shore from the local area shopping designation to give greater flexibility to the type of uses which premises can be given.

Green Areas

A new allotment is proposed in the north of Blackpool, providing up to 40 plots on land off Fleetwood Road.

Green belt boundaries are proposed to be amended at Faraday Way in Bispham to follow the natural field boundaries resulting in a net gain. But some land would be removed from the green belt on Blackpool’s southern boundary with Fylde, just off Common Edge Road to support growth at the Blackpool Airport Enterprise Zone.

The status of Marton Moss as an area of countryside will be removed because the area is now covered by a new neighbourhood strategy with the formation of the Marton Moss Forum. It will leave just a stretch of land between Newton Hall and Mythop Road designated as countryside, maintaining a buffer between Blackpool and Staining.

Private Gardens

The trend towards developing residential gardens for housing is addressed, with planners highlighting the role of gardens in providing wildlife habitats and preventing flooding.

Measures are proposed to resist over-intensive building in gardens with schemes having to meet a number of requirements including protecting privacy, sunlight and outlook.

The Housing sites:

- Former Filling Station at Norbreck Castle (15)
- Former Mariners Public House (35)
- Former Bispham High School & Land off Regency Gardens (274)
- Land at Bromley Close (12)
- Land to the rear of Warley Road (14)
- Land at Hoo Hill Lane (12)
- Land at Grange Park (200)
- Former Dinmore Pub (18)
- Land at Coleridge Road (25)
- Land at George Street (14) 190 – 194 Promenade (15)
- Former Allandale Hotel, Abingdon Street (6)
- South King Street (52)
- Bethesda Road Car Park (13)
- Tram Depot Rigby Road (100)
- Whitegate Manor, Whitegate Drive (16)
- Land off Kipling Drive (14)
- Ambulance Station, Parkinson Way (34)
- Former Grand Hotel, Station Road (13)

Land at Rough Heys Lane (27)	
Land at Enterprise Zone, Jepson Way (57)	
Former NS & I Site, Preston New Road (90)	
Total	1,056

Gazette Article: 21st Jan 2019

Blackpool's battle against obesity could stop fast food restaurants from opening

New takeaways could be stopped from opening in parts of Blackpool as part of the battle against obesity. Health chiefs in the resort are hoping to reinforce planning controls to restrict the number of junk food outlets fuelling the crisis. Blackpool's battle against obesity could stop fast food restaurants from opening. Figures released last autumn showed the number of takeaways in the town had doubled in the past eight years, meaning Blackpool had the second highest number per head of population in the country.

At the same time, obesity levels are above average – with around a third of adults and a third of primary school children classed as overweight or obese. Now, regulations are set to be adopted in Blackpool's new Local Plan which would prevent new takeaways opening within 400 metres of neighbourhoods where more than 15 per cent of Year Six pupils or 10 per cent of reception pupils are classed as very overweight. That, it was confirmed to The Gazette, is currently every part of Blackpool. The only exception to the proposed policy would be the Promenade, which is deemed to serve the tourism industry. A council report setting out evidence for the policy, says "there is compelling evidence of associations between obesity, particularly in deprived areas and the availability of fast food".

Surge in Blackpool takeaways coincides with rise in obesity

Figures show Blackpool's three most deprived wards – Talbot, Bloomfield and Claremont have the most hot food takeaways and the heaviest children in the town. The Bloomfield ward, which encompasses Central Drive, has 58 takeaways – of which 10 are on the Prom – and is the most deprived ward, with almost a quarter of Year Six children considered obese. The report says "applying this policy will prevent further over-concentrations of hot food takeaways." Dr Arif Rajpura, Blackpool's director of public health, said the move was part of a range of measures aimed at improving people's eating habits. Calories are not evil... He said: "Where we live has a key role to play in tackling obesity and as a local authority we have a clear challenge in balancing healthier environments and the demand for thriving and vibrant high streets. "Public health has strong links with planning as the environment is a key determinant of health and wellbeing. "In particular the food environment plays an important role in promoting a healthy diet including an individual's proximity to food retail outlets and the type of food available. "The food environment is constantly evolving with a wide range of choice of what to eat and when to eat. "While not all fast food is unhealthy, it is typically high in saturated fat, salt, sugar and calories. Maintaining choice is important but we need to support our residents to easily identify healthy options." READ MORE: Fast food limits could be coming to your corner of Lancashire In January 2016, the council signed a Local Declaration on Healthy Weight as part of its commitment to tackling obesity, and in 2017 it launched the Healthier Choices Award, working with businesses to offer healthier options. Dr Rajpura added: "This scheme has proved successful with over 100 businesses getting involved, however, in Blackpool we are one of the towns with the highest number of fast food takeaways per head of population and we need to consider ways of reducing the number of these outlets." Figures collected by the BBC and published last October show that, since 2010, the number of fast food sellers in Blackpool has increased from 70 to 135. It means nearly half – 47 per cent – of the resort's food outlets are selling fast food, adding up to 97 takeaways per 100,000 people and placing the town second only to Westminster in London when it comes to easy access to this type of food. The proposed restrictions are included in part two of the Blackpool's Local Plan which is out for consultation until February 19.

A number of other local authorities have already introduced similar controls. Reaction from some of Blackpool's takeaway owners has been positive. Tracy Ogretici, owner of Taylors Fish & Chips on St Annes Road, South Shore, said she agrees with the council's proposals. She said: "My first reaction to them is great. There are far too many takeaways in Blackpool saturating the market and some of them are not very nice at all. "I believe it should be on quality rather than quantity." Joseph Hatton, owner of Babylon Blackpool on Waterloo Road, also South Shore, added: "Obesity is a big problem in the country and I would agree with the council's decision probably. "There are too many takeaways in Blackpool. We used to have four and we only have the one now."

Appendix G: Schedule of Representations – Informal Paper

Blackpool Council

Local Plan Part 2: Site Allocations and Development Management Policies

Proposed Site Allocations and DM Policies - Informal Consultation Jan-Feb 2019

Schedule of Representations



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Chapter 1: Introduction

No comments received.

Chapter 2: Proposed Site Allocations and Designations

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
Proposed Site Allocations			
Site ref H3: Former Bispham High			
013	D Pidgley	I would hope that we are talking about extending the quality homes like the ones built by the water tower (Regency Gardens) and not another Foxhall village scheme. Also infrastructure will need looking at shops, GP access etc.	<p>Comments noted.</p> <p>The detailed design of housing is determined at the planning application stage. A key objective of the Core Strategy is to support new housing provision to deliver a choice of quality homes, and this is reflected in its policies. Planning applications for the development of this site will need to accord with relevant design policies in the Core Strategy and Local Plan Part 2. These aim to ensure good design and protect residential amenity. The site will contribute towards meeting Blackpool’s housing requirement as set out in Core Strategy Policy CS2:</p> <p>The Infrastructure Delivery Plan ensures that infrastructure needs of development set out in the Local Plan are considered. Where appropriate, contributions are sought for infrastructure in accordance with existing Core Strategy Policy CS11: Planning Obligations.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
035	Sport England	<p>This allocation includes school playing fields and multiple courts. The school was not demolished until January 2017. Therefore, Sport England would be a statutory consultee on any application which includes the playing fields and would assess the proposals against our playing field policy. The site appears to be referenced within the PPS Action Plan.</p> <p>The PPS shows lack of capacity for football, RFL and 3G pitches. Therefore, the PPS does not demonstrate this site (or part of a site), is clearly surplus to requirements therefore retention and protection or replacement of the sites (or part of a site) will be required to comply with Sport England policy exception E4.</p> <p>There appears to be no justification for the allocation of this playing field site for housing and therefore Sport England OBJECT to this allocation.</p>	<p>The Blackpool Playing Pitch Strategy has been updated and provides the evidence and justification to show that Blackpool has sufficient playing pitch capacity to the end of the plan period without having to protect this site. Appropriate recommended actions are highlighted in the PPS Action Plan.</p> <p>The site will therefore contribute towards meeting Blackpool's housing requirement as set out in Core Strategy Policy CS2.</p>
073	S Clifford	<p>Are there any plans for infrastructure in the areas involved?</p> <p>Obviously I am more aware of the implications for the Bispham High School site, due to local knowledge. By infrastructure, I am referring to day to day life – congestion of road, road safety, schools (primary and senior), doctors, dentists etc. Bispham High School site has 274 houses planned, realistically that is an extra 528 adults plus an</p>	<p>The 2014 Infrastructure Delivery Plan considered the scale of development proposed in the Core Strategy and established what additional infrastructure and service needs were required to support the overarching strategy for new homes and jobs in the borough to 2027.</p> <p>The Infrastructure Delivery Plan update (2021) reflects the latest position and ensures that</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>average of 2 children per family? These days, lots of families have 2 cars so goodness knows how much more traffic will be generated on Bispham Road.</p> <p>This applies to most of the suggested sites area plus I don't think Devonshire Gardens and Devonshire Road Hospital site have even been captured into the proposal?</p>	<p>infrastructure needs of development set out in the Local Plan are considered. Where appropriate, contributions are sought for infrastructure in accordance with existing Core Strategy Policy CS11: Planning Obligations.</p> <p>Infrastructure matters are also being considered as part of the current planning application for this site.</p> <p>The Devonshire Gardens (Coopers Way) housing development housing allocation in the Publication version of the Local Plan Part 2. It also has planning permission and the development is currently being constructed.</p> <p>With respect to the Devonshire Road Hospital Site, the site owners have not indicated that they wish to pursue housing development on the site, so it is not included as a housing allocation in the Publication version of the Local Plan Part 2.</p>
Site ref: H7: Land at Grange Park, Chepstow Road, Dinmore Avenue & Bathurst Avenue			
035	Sport England	This allocation includes playing fields, therefore, Sport England would be a statutory consultee on any application which includes the playing fields and would assess the proposals against our playing field policy.	The Blackpool Playing Pitch Strategy has been updated and provides the evidence and justification to show that Blackpool has sufficient playing pitch capacity to the end of the plan period without having to protect this site. Appropriate

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>The PPS shows lack of capacity for football, RFL and 3G pitches. Therefore, the PPS does not demonstrate this site (or part of a site), is clearly surplus to requirements therefore retention and protection or replacement of the sites (or part of a site) will be required to comply with Sport England policy exception E4.</p> <p>There appears to be no justification for the allocation of this playing field site for housing and therefore Sport England OBJECT to this allocation.</p>	<p>recommended actions are highlighted in the PPS Action Plan.</p> <p>The proposed site will contribute towards meeting Blackpool's housing requirement as set out in Core Strategy Policy CS2.</p>
Site ref H11: 190-194 Promenade			
015	Historic England	<p>The site is adjacent to the Town Centre Conservation Area but Appendix 2 incorrectly states that there are no heritage assets adjacent to the site. In line with the Plan's emphasis on key views to important heritage assets and also the inclusion of a tall buildings policy, the identification of assets should be considered more than those within or adjacent to the site. Heritage assets can be harmed by development that is further afield. There does not appear to be any assessment to justify the inclusion of this site within the Plan and the quantum of development of up to 15 dwellings in line with our comments above.</p>	<p>Comments noted. In summer 2019 the Council's Conservation Officer undertook a Heritage Impact Assessment for this site. This identified the heritage assets affected, assesses the site contribution to the significance of the heritage assets identified, assesses the impact of allocating this site for housing on the significance of the heritage assets, considers enhancements to the historic environment or ways to mitigate harm and provides conclusions and recommendations on the potential allocation.</p> <p>The heritage impact assessment concludes that the site currently has a negative impact on views towards and from a number of designated and non-designated heritage assets. It states that</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
			allocation of the site has the potential to enhance those views, providing development is carried out to an appropriate height and design. The detailed assessment can be found in the Housing Topic Paper. Therefore, the site is proposed for housing allocation.
Site ref H12: Former Allandale Hotel, Continental & Carlton House Hotels, Abingdon Street			
015	Historic England	Whilst we welcome acknowledgement that the site needs to consider the conservation area and the Grade II library opposite the site. In line with the Plan's emphasis on key views to important heritage assets and also the inclusion of a tall buildings, the identification of assets should be considered more than those within or adjacent to the site. Heritage assets can be harmed by development that is further afield. There does not appear to be any assessment to justify the inclusion of this site within the Plan and the quantum of development of 6 dwellings in line with our comments above.	Comments noted. The Council is no longer proposing to allocate this site for housing in the Local Plan Part 2. It is a very small site and utilising the standard housing density multiplier, as set out in the Strategic Housing Land Availability Assessment, it is not considered large enough to deliver 10 or more dwellings, which is the revised site size threshold proposed for housing allocations.
Site ref H15: Tram Depot Rigby Road			
004	Trams to Lytham	I have concerns about the allocation of the tram depot at Rigby Road for housing within the local plan period. While I understand that relocation of operations would be pursued before any development would begin, the loss of this site could be significant. There are ambitions to further expand the tramway in the future (likely within the local plan period) and its annual patronage and revenue are	Comments noted. The Council is no longer proposing to allocate this site for housing in the Local Plan Part 2 due to uncertainty around the need for the site in relation to the tramway.

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>increasing annually.</p> <p>Since the existing depot facility at Starr Gate is nearly at full capacity (18 out of 20 Flexity 2 vehicles), new sites for additional storage must be sought in the near future. There is certainly the possibility for the existing Rigby Road depot to be upgraded to serve both modern and heritage tram vehicles (particularly if the adjacent bus depot is relocated), which would address the storage problem. This option may be cheaper than building a storage/maintenance shed in another location given its inbuilt connection to the tramway, especially since no safeguard has been put in place for the suggestion of an additional storage facility at Starr Gate adjacent to the existing site.</p> <p>The loss of the heritage tram depot would mean that a new site must also be found for these vehicles and may result in the problem of heritage and LRT operations competing for new storage sites, preventing the maximisation of growth for the network. This closure may also lead to the loss of the existing street track on Lytham Road, which is a key asset and could be utilised as part of future tramway projects. Overall, I object to the allocation.</p>	
066	Environment Agency	The site assessment (page 39-41 of Appendix A1) identifies that much of the site is within Flood Zone 3 (high risk). As such, the requirements of the Sequential Test and	Comments noted. The Council is no longer proposing to allocate this site for housing in the

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>Exception Test will need to be satisfied in order to ensure compliance with the NPPF.</p> <p>The risk to this site will need to be considered through a Level 2 Strategic Flood Risk Assessment (SFRA). Mitigation measures necessary to make the development safe for its lifetime will need to be identified.</p> <p>In the absence of detailed outlining the minimum requirements in the local plan necessary to make the development safe from flooding, there is a risk that the allocation will fail part b) of the Exception Test. Once the mitigation measures have been identified in the local plan, it will be for developers to then demonstrate how their proposals comply with those requirements through a site-specific Flood Risk Assessment (FRA) submitted as part of a subsequent planning application for the site.</p>	<p>Local Plan Part 2 due to uncertainty around the need for the site in relation to the tramway.</p>
074	J Kay	<p>I note that partial development of the site could be a possibility. I do not consider partial development would be suitable as an industry/residential mix is not idea or compatible.</p> <p>As it contains the remains of the very first tram depot (possibly a world first?) the site should be development in conjunction with the heritage trams as a transport heritage site. The cost of building new facilities for the heritage tram even if a site is available adjacent to the existing</p>	<p>Comments noted. The Council is no longer proposing to allocate this site for housing in the Local Plan Part 2 due to uncertainty around the need for the site in relation to the tramway.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>tramway would be very costly and we would lose a very large part of our transport heritage.</p> <p>I know that in the past we have lost too much of our heritage. Please don't do this with this site.</p>	
Site Ref H17: Land off Kipling Drive			
025	Natural England	<p>This site triggers an Impact Risk Zone Assessment (IRZ) for potential impacts on land functionally linked to the designated sites. This needs further consideration.</p>	<p>This site has been subject to preliminary ecological appraisal work by the Greater Manchester Ecology Unit (GMEU). In terms of potential impacts on designated sites, GMEU state that although the wider area around Marton Mere does have some potential to support birds associated with the Liverpool Bay SPA this site itself is relatively small and is very close to roads and housing developments. It is therefore very disturbed and therefore has negligible potential to act as functionally linked land. The development of the site will not directly affect the special interest of the Marton Mere SSSI</p> <p>The site supports rough grassland and scattered trees. GMEU state that it has potential to support foraging bats and possibly badgers. These constraints are considered unlikely to be substantive and there are large areas of use to foraging bats to the north, together with badger habitat. A Phase 1 habitat survey, bat activity surveys and a badger survey would be necessary to</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
			support a planning application. The survey requirements are referred to in the key development considerations for this site set out in Schedule 1 of the Local Plan Part 2 Publication.
058	Bourne Leisure	<p>This proposed allocation is for up to 14 houses, close to the West boundary of the Marton Mere Holiday Village. Bourne Leisure recognises the role that this allocation will have in delivering homes in the area. The Company is pleased to note that the emerging policy text acknowledges that the holiday park is currently being extended to the north of the proposed allocation site. In accordance with paragraph 182 of the Framework, the final policy should ensure that any housing development taking place on this proposed site will not compromise the existing and continued operations of the existing and extended holiday park. Any adverse impacts upon the Holiday Village arising from the development will be detrimental to the local economy.</p> <p>Therefore, in order for the emerging policy to be considered justified and consistent with national policy, the following wording should be added to the Key Development Considerations as an additional bullet point and taken forward in the final policy for this site:</p> <p>“Any development must integrate effectively with existing businesses, including Marton Mere Holiday Village. Existing businesses should not have unreasonable restrictions</p>	The key development considerations for this site, as set out in Schedule 1 of the Local Plan Part 2 Publication, have been amended to state that proposed development will be required to take account of the proximity of the site to the existing Marton Mere Holiday Village and not compromise its operations.

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>placed on them as a result of this housing allocation and any development associated with it. The applicant will be required to provide detail of suitable mitigation as part of any planning application and this must be delivered before the development has been completed and before occupation takes place.”</p>	
Site Ref H20: Land at Rough Heys Lane			
011	I Bagot	<p>As you will see from my address, my property backs onto the site in question. I have lived in this property since December 1968.</p> <p>Following the closure of a Tomato Plan greenhouse over many years ago, the land has not been touched by Blackpool Council.</p> <p>The land is visited regularly by a vast amount of foxes which probably come from over Yeadon Way and rats have nests on the land.</p> <p>I think the piece of land would benefit from a small holding of properties in a nice selected area.</p>	<p>Comments noted.</p> <p>In terms of ecology, the site does not have any nature conservation designations, but it includes trees, rough grassland, hedges and ditches that can provide habitats for wildlife. The site has been subject to preliminary ecological appraisal work by the Greater Manchester Ecology Unit which indicates that there is potential for it to support foraging and roosting bats, water voles and badgers. These constraints are not considered substantive enough to necessitate the withdrawal of this site from consideration, but an extended Phase 1 habitat survey, water vole survey, bat surveys (roosting and activity) plant survey for meadow rue and badger survey would be necessary to support a planning application. If necessary, compensation and mitigation for ecological harm may be required. The survey requirements are referred to in the key</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
			<p>development considerations for this site set out in Schedule 1 of the Local Plan Part 2 Publication.</p> <p>The proposed allocation is for 27 properties. The detailed design of housing would be determined at the planning application stage and any proposal would need to accord with relevant design policies in the Core Strategy and Local Plan Part 2. These aim to ensure good design and protect residential amenity. The site will contribute towards meeting Blackpool’s housing requirement as set out in Core Strategy Policy CS2.</p>
023	J and M Hirst	<p>It has come to my attention that there is a proposal for the land between Rough Heys Lane and Ravenglass Close, Blackpool (Site reference H20) to be developed to accommodate 27 residential properties. As this site is to the rear of my property I have some major concerns with the proposed development and as the local council representatives for this area I would like to express to you my official and complete objection to this development. I base my objections to this development with the following justifications:</p> <ol style="list-style-type: none"> 1. Within the H20 site assessment document it is stated that the land is a flood zone 1 (low risk) site. Having lived adjacent to the site for the last 3 years I would have to disagree with this assessment. The flooding can be quite substantial throughout the 	<p>With respect to point 1, the Flood Zone information is sourced from Environment Agency records and this site is located in Flood Zone 1, which means that it is at low risk of flooding from rivers. However, Environment Agency records indicate that although the majority of the site is at very low risk of surface water flooding, there are small areas where the risk is higher (although still classified as low). In addition new development of any significance will be required, by condition, to comply with Government standards on sustainable drainage systems which mean that run-off from new sites will be restricted to the equivalent rate of run-off from the greenfield site. United Utilities have invested considerable sums in improvements</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>winter months and I have had to install a French drainage system, sump and pump within my grounds to alleviate the flooding issues and the effects that this has had with my property. (Please see attached photos of the flooding issues we have encountered and the remedial work that has been undertaken).</p> <p>2. The proposed access to the new residential estate is via Rough Heys Lane, which is classed as unadopted land and is therefore maintained by the co-operation of the four property owners of Rough Heys Lane. The increase of traffic on this unadopted land to access the new site will be significant with most households having 1-2 vehicles and therefore potentially costly to the residents that maintain this unadopted land.</p> <p>3. Rough Heys Lane is also an access route to the nearby public footpaths that are frequented by school children, dog walkers and ramblers as well as equestrians. The increased traffic flow that would be generated from these proposed residential properties would cause a significant hazard, as the lane is already narrow and can be difficult at the best of times to gain access to Hawes Side lane due to traffic flow and on street parking on Hawes side lane. The increase in traffic flow will make the likelihood of an accident much</p>	<p>to the capacity of the surface water drainage network in the southern part of Blackpool.</p> <p>Regarding points 3 and 4, any new housing development would be required to meet nationally accepted standards of access and layout and to provide appropriate levels of car parking. This may involve a developer contributing to off-site highway works to make the development acceptable. The development management policy relating to transport requirements will ensure that new development will not have an adverse effect on traffic generation.</p> <p>Regarding point 5, the site will be subject to an ecological appraisal to assess biodiversity issues and the outcome of this appraisal will be taken into account during the allocation process. In terms of ecology, the site does not have any nature conservation designations, but it includes trees, rough grassland, hedges and ditches that can provide habitats for wildlife. The site has been subject to preliminary ecological appraisal work by the Greater Manchester Ecology Unit which indicates that there is potential for it to support foraging and roosting bats, water voles and badgers. These constraints are not considered substantive enough to necessitate the withdrawal</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>higher in what is already a difficult lane to navigate.</p> <p>4. The plans show access to the new site via Rough Heys Lane and then running adjacent to my property, this increase in traffic will have a detrimental effect with increase in noise from cars/vans etc.</p> <p>5. Currently the rear of my property overlooks the field which is utilised by the local wildlife and also horses which are kept there. Although the site is not under any conservation designations, the loss of this greenfield site would be harmful to the local wildlife as another greenfield space would be permanently lost.</p> <p>6. Any properties built within this proposed site would directly impact upon the privacy I currently enjoy. My home would become overlooked from the rear of my garden and due to the new access to the site it would also be viewable from the side of my garden.</p> <p>7. The proposed development will be above the level of my cottage; this will have a negative effect on the light/overshadowing of my property. I appreciate that this is all in the very early stages of the proposal but I look forward to hearing your thoughts on the matter regarding my concerns.</p>	<p>of this site from consideration, but an extended Phase 1 habitat survey, water vole survey, bat surveys (roosting and activity) plant survey for meadow rue and badger survey would be necessary to support a planning application. If necessary, compensation and mitigation for ecological harm may be required. The survey requirements are referred to in the key development considerations for this site set out in Schedule 1 of the Local Plan Part 2.</p> <p>With respect to points 6 and 7, the detailed design of housing would be determined at the planning application stage and any proposal would need to accord with relevant design policies in the Core Strategy and Local Plan Part 2. These aim to ensure good design and protect residential amenity. For example, Core Strategy Policy CS7 – Quality of Design requires new development to ensure that amenities of nearby residents and potential occupiers are not adversely affected.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
Site ref H21: Land at Enterprise Zone, Jepson Way			
025	Natural England	This site triggers an IRZ for potential impacts on land functionally linked to the designated sites. This needs further consideration.	<p>This site has been subject to preliminary ecological appraisal work by the Greater Manchester Ecology Unit (GMEU). They do not identify any ecological considerations that would impose a significant constraint to future developments. In terms of potential impacts on designated sites, GMEU state that although the wider area to the south does have some potential to support birds associated with the Liverpool Bay SPA this site itself is small, partly previously developed, disturbed land close to roads and housing developments. It therefore has negligible potential to act as functionally linked land.</p> <p>Planning application 19/0271 has been submitted for mixed use development on this land and the wider Enterprise Zone. The application is accompanied by a Preliminary Ecological Appraisal and Information in Support of an Appropriate Assessment (April 2019).</p>
044	Fylde Council	Fylde Council has no comment to make in relation to the site allocations proposed, other than to support the allocation H21 close to the boundary with the Borough of Fylde, which is recognised as enabling development within the Draft Masterplan for Blackpool Airport Enterprise Zone.	Support noted.

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
035	Sport England	<p>This allocation includes playing fields, therefore, Sport England would be a statutory consultee on any application which includes the playing fields and would assess the proposals against our playing field policy.</p> <p>The PPS shows lack of capacity for football, RFL and 3G pitches. Therefore, the PPS does not demonstrate this site (or part of a site), is clearly surplus to requirements therefore retention and protection or replacement of the sites (or part of a site) will be required to comply with Sport England policy exception E4.</p> <p>There appears to be no justification for the allocation of this playing field site for housing and therefore Sport England object to this allocation.</p>	<p>The Blackpool Playing Pitch Strategy has been updated and provides the evidence and justification to show that Blackpool has sufficient playing pitch capacity to the end of the plan period without having to protect this site. Appropriate recommended actions are highlighted in the PPS Action Plan.</p>
Site Ref H22: Former NS & I Site, Preston New Road			
025	Natural England	<p>This site triggers an IRZ for potential impacts on land functionally linked to the designated sites. The impact of the proposal on the surrounding land (potentially functionally linked to the SPA) needs further consideration.</p>	<p>The area of the land subject to H22 currently has permission for employment uses (Application 15/0420). This application was supported by a number of ecological appraisals and the principle of development for employment uses was considered acceptable.</p> <p>This site has been subject to further preliminary ecological appraisal work by the Greater Manchester Ecology Unit (GMEU). They do not</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
			<p>identify any ecological considerations that would impose a significant constraint to future developments. In terms of potential impacts on designated sites, GMEU state that although the wider area around Marton Mere does have some potential to support birds associated with the Liverpool Bay SPA this site itself is previously developed, disturbed land close to roads and housing developments. It therefore has negligible potential to act as functionally linked land. The development of the site will not directly affect the special interest of the Marton Mere SSSI.</p>
064	Rowland Homes	<p>Rowland fully supports the site’s allocation which reflects the suitability and deliverability of the site, and respectfully requests that this allocation is retained in subsequent iterations of the local plan, including the adopted version.</p> <p>The allocation of the site for residential development through the Local Plan Part 2 would be entirely consistent with the sentiment and intention of Chapter 11 of the National Planning Policy Framework (“NPPF”) which concerns ‘making effective use of land’. Specifically, paragraph 120 of the NPPF.</p>	Noted.

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
Site ref T1: Land at Faraday Way			
*Some of the representations received regarding T1 Faraday Way contained inappropriate content which has not been included in the comments column.			
005	C Fazey	<p>T1 - Faraday Way</p> <p>This road is used daily by myself and at present is a danger with all the parked cars making the road very narrow, I would think instead of creating more traffic problems by adding a caravan park directly opposite. It would make far more sense to build a car park, as the surrounding roads do not have the parking capacity to support the business.</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p> <p>With respect to parking, the Local Highway Authority have been consulted and do not consider that there are currently unacceptable consequences arising from parking in this locality.</p>
006	P Aldersley	<p>T1 - Faraday Way</p> <p>- the Site Description is misleading to the say the least. Although the site has employment uses, this description fails to mention that there are several large residential areas located in the near proximity. In fact there is an</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>additional outstanding plan to build further homes on the site of the Norcross Buildings which will further increase residential usage.</p> <p>- the Site Description also describes 'open land to the north'. Again I would dispute this as this consists of a field immediately adjacent to a large residential area in Carleton.</p> <p>- This is a greenfield site. Although not currently used, this site has been used in the past. Surely the loss of further green field sites must be discouraged.</p> <p>What do you define as 'travelling showpeople'? A circus regularly visits the area and all the showpeople stay on a field adjacent to Norcross Lane. What additional provision is required?</p> <p>Concern is raised about the impact on the saleability of properties surrounding the proposed pitch.</p>	<p>have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p> <p>National planning policy defines travelling showpeople as: "Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily."</p>
008	Shepherd Planning on behalf of Mr & Mrs McLachlan	<p>T1 - Faraday Way</p> <p>The document suggests that the site identified at Figure 1, Site T1, is an appropriate site for gypsy, traveller and travelling show people. This is indicated on pages 11 and 12 and is justified by the Council in preceding paragraphs.</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet</p>

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		<p>Whilst it is acknowledged that councils have to provide suitable sites to meet the needs of an identified number of such sites, it is also noted (in respect of the Marton Moss Forum and proposed Neighbourhood Plan) that involved parties in that part of the councils administrative district, have also sought to involve gypsy, traveller and show people in their plans for that part of the borough – apparently to no avail. Gypsy, travellers and Travelling show people want to live where they want to live, not where councils want them to go. They would certainly not want to be beholding to the council in any way (as they would be in this case as the council own the land in question).</p> <p>There are a number of reasons why this site is NOT appropriate for such development. Firstly, the site has some good, mature tree coverage on it that as well as being visually pleasing and in character with the eastern side of Faraday Way, will also provide habitat for wildlife and aid and improve bio-diversity at the site and nearby land. The proposal to use the land as suggested will, inevitably, see the loss of trees and woodland and a reduction in bio-diversity at the site – totally contrary to the NPPF and Policy CS6 – Green Infrastructure, of the Core Strategy Part 1.</p> <p>Secondly, there is no physical development along this side of Faraday Way until the offices of “Clinisafe”, Kaman</p>	<p>the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p> <p>In terms of the Green Belt boundary, the Council considers that the Local Green Belt Review Assessment provides a robust assessment and justification for the localised minor amendment to the Green Belt.</p> <p>The current green belt boundary close to Faraday Way adjacent to the Technology Park appears to cut across the field in an arbitrary nature and does not follow any physical features of the landscape. This review presents the opportunity to address this localised anomaly making the least impact and therefore amending the boundary to follow the existing field boundary in accordance with NPPF which would also ensure consistency with the Green Belt designation to the east of the borough boundary in Wyre Borough.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>Court, some 200 metres south of the proposed site. Why would you want to introduce what would be visually inappropriate development on Green Belt land (part of the site is currently allocated as Green Belt but is proposed to be removed from it!) (or on the edge of it) when the next development is some 200 metres south of the site? This would be visually inappropriate and contrary to the NPPF at paragraphs 133 and 134.</p> <p>Paragraph 133 states; <i>“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”.</i></p> <p>By removing land that is already allocated as Green Belt purely to facilitate the use as gypsy, traveller and show-man’s use is contrary to paragraph 133. You are wanting to allow/condone urban sprawl by allowing this land to be used for gypsy, traveller and show-man’s use. It should be kept permanently open.</p> <p>Paragraph 134 states; <i>“Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another;</i></p>	

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		<p><i>c) to assist in safeguarding the countryside from encroachment;</i></p> <p><i>d) to preserve the setting and special character of historic towns; and</i></p> <p><i>e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”.</i></p> <p>In respect of a), the proposal to use the land for gypsy, traveller and show-man’s use, would lead to development of the land that would <i>extend the built-up area</i>.</p> <p>In respect of c), the proposed use would be seen as development <i>encroaching in to the countryside</i>. The <i>Green Belt should be extended</i> here to Faraday Way, NOT reduced to accommodate the gypsy, traveller and show-man’s use.</p> <p>In respect of e), the land is <i>not</i> derelict and has the appearance of natural land with trees on that offers some bio-diversity/ecological benefit.</p> <p>Thirdly, Paragraph 2.29 of the document is clear in that a site for two gypsy/traveller pitches would require a <i>minimum</i> size of 0.07Ha. A site for a travelling showman would need to be 0.2Ha of land (paragraph 2.31). These areas would decimate the bio-diversity value of the lands in question contrary to both central government planning policy and Blackpool’s own policy on such lands.</p>	

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		<p>Fourthly, and this has to be seen in concert with the proposed gypsy, traveller and showman’s sites as detailed above, the proposed boundary changes to the Green Belt land at Faraday Way North (see figure 3 on page 16). The proposed change to the Green Belt boundary as detailed on the plan is a very convoluted extension, that is proposed on the basis of “natural field boundaries” (paragraph 2.51). A far more easy and definitive extension for the boundary of the Green Belt would be for it to be extended up to Faraday Way. This is a physical boundary that is clear for all to see. As drawn on figure 3, it is clearly drawn to “accommodate” land suitable for the provision of the above-mentioned gypsy, traveller and showman’s sites. In fact, part of the existing Green Belt is shown (hatched grey) as actually being <i>removed</i> from the Green Belt to form part of the proposed gypsy, traveller and showman’s sites. This seems a deliberate act to ensure that land is available of a sufficient size for such provision. This is contrary to Green Belt guidance in the NPPF (see above) and to the council’s own policies in respect of Green Belts.</p> <p>Fifthly, the land to the north of the proposed gypsy, traveller and showman’s sites <i>and</i> the actual land <i>proposed</i> for gypsy, traveller and showman’s sites, should ALL be allocated as Green Belt. The highway that is Faraday Way is a perfectly acceptable physical boundary to the edge of the</p>	

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		<p>Green Belt. Why propose retaining these areas as gypsy, traveller and showman’s sites and actually <i>removing</i> land that is currently allocated as Green Belt, purely to accommodate these gypsy, traveller and showman’s sites? The council previously used the argument that Faraday Way was a suitable physical barrier to the Green Belt between Blackpool and Wyre a number of years ago, in support of their arguments, in relation to appeals in to Certificate of Appropriate Alternative Development at Wyre Council for lands approximately 300 metres north of the land in question for the proposed gypsy, traveller and showman’s sites (<i>appeal decision attached and plan of lands in question</i>). The appeal Inspectors decision is attached regarding the above appeal. Blackpool Councils case (in part) at that time, was that Faraday Way was an appropriate demarcation of the Green Belt between Blackpool and Wyre, yet now, in the case of this land for gypsy, traveller and showman’s sites, they are actively proposing <i>removing land from the Green Belt</i> to provide these sites and suggest that it is appropriate to rely on old field boundaries to demarcate the Green Belt when these old field boundaries have no relationship to anything in the locality now – the whole area has changed considerably. The line of Faraday Way is the only obvious choice for the new boundary of the Green Belt. It is a strong, physical boundary and the extended Green Belt should extend that far – rather than <i>removing part of the existing Green Belt</i></p>	

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		<p>purely to facilitate the proposed gypsy, traveller and showman’s sites.</p> <p>I would ask that you consider my comments regarding the land in question and in respect of the proposed boundary changes to the Green Belt at the same location.</p>	
012	D Charles	<p>T1 - Faraday Way</p> <ol style="list-style-type: none"> 1. The entrance and exit on a main road of potentially slow moving traffic is wholly unsuitable in view of the volume of traffic of traffic and potential for accidents. 2. The fields adjoining the proposed site are frequently occupied by up to 60 beef cattle at any one time – included in this at times would be an adult bull. The integrity of these fences are paramount and should these be breached or any gates left open there will be potential for cattle getting on the road or in the gypsy camp with obvious consequences. 3. The plantation of trees in the area is just maturing and to remove these and threaten the biodiversity in the area is sheer eco-vandalism and should be resisted on ecological grounds. 4. There exists in the area a colony of Great Crested Newts, a protected species which was compromised by the creation of the Technology Park in the past decade and will be further threatened by Blackpool Councils proposed development here. 	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p>

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		5. The land in question is green belt and its purpose to prevent development and to make the boundary between Wyre Borough and Blackpool Borough. Blackpool Borough has in the past argued that this status should be maintained – this argument should still be relevant and not be abandoned for the expedience of siting a gypsy camp.	
013	D Pidgley	<p>T1 - Faraday Way</p> <p>On the gypsy site on Faraday Way I think if the number of pitches is guaranteed not to rise and this is made legally binding (as we all know the usual procedure of get a small amount agreed and then plan an increase) then this may be acceptable.</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p>
022	D Malley	<p>T1 - Faraday Way</p> <p>I would like to object to this proposal. I have a number of concerns:</p> <p>The stealing of more Greenbelt land Impact on the wildlife in the area, it is like a little garden of Eden in amongst the villages</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>The traffic danger of lorries and vans manoeuvring on and off the site. Faraday way is a busy thoroughfare that is regularly narrowed by parked cars.</p> <p>The loss of my shooting privileges on the land behind the proposed site. I would not be happy using a firearm near a gypsy camp</p>	and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.
026	I Wood	<p>T1 - Faraday Way</p> <p>I object to travellers etc. on land to the east of Faraday Way.</p> <p>Concern is raised about the impact of the site on house prices and hopes that the site doesn't go ahead.</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p>
027	D Ogden	<p>T1 - Faraday Way</p> <p>I am of the understanding that you are running a consultation period which began on Thursday 10th of January 2019 until the 21st February 2019. I have only found out about the above today from an anonymous letter put through my door, presumably from a neighbour. Was the consultation period made public to nearby residents?</p>	<p>Consultation was undertaken in accordance with the Local Plan Regulations 2012 and the Council's adopted Statement of Community Involvement. Notification emails were sent out to all those individuals and organisations on the Council's Local Plan consultation database. There were articles in the Blackpool Gazette and there have been a number of social media posts on the Council's Twitter and Facebook sites.</p>

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		Are there going to be any public consultation meetings with the local residents and Blackpool council?	At this informal consultation stage, there were no consultation meetings.
028	S Thompson	<p>T1 - Faraday Way</p> <p>Strongly objects to the proposed site at Faraday Way.</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p>
029	L Porter	<p>T1 - Faraday Way</p> <p>The proposed site for Gypsy and Traveller pitches and Travelling Show People on the land at Faraday Way, with proposed boundary changes to Green Belt between Blackpool and Wyre Districts, is contrary to Government strategies where it attached great importance to these areas. The aim of these areas is to present urban sprawl therefore keeping the land permanently open.</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>The above site has some good mature trees which is a natural habitat for wildlife and the proposal for the site to be used will inevitably see tree loss and woodland biodiversity which is totally contrary to the NPPF and policy CS6 Green Infrastructure of the Core Strategy. My question is why introduce a visually inappropriate development on Green Belt area only to be removed when it suits? Allowing at present a very pleasant visual view to be spoilt when travelling from the eastern side of Faraday Way and seen only as a development encroaching into the countryside.</p> <p>Contrary to both Central Government policy and Blackpool's own policy the size required for the site required 0.07ha of land which would decimate biodiversity value.</p> <p>The entrance and exit of the site is on a main road. When the development for Westminster Gardens took place there was an application for an entrance and exit on Faraday Way, which was rejected, due to the amount of traffic and was said to be potentially dangerous. Since then a new Post Office has been built and contributed to the parking of cars on the road side and an increase and constant flow of traffic. Should a site be passed for the above with the entrance and exit as proposed bearing in mind there could well be horses and carts manoeuvring to and from the site, increases the potential risk of accidents.</p>	<p>Therefore, there is no longer a need to identify such a site.</p> <p>In terms of the Green Belt boundary, the Council considers that the Local Green Belt Review Assessment provides a robust assessment and justification for the localised minor amendment to the Green Belt.</p> <p>The current green belt boundary close to Faraday Way adjacent to the Technology Park appears to cut across the field in an arbitrary nature and does not follow any physical features of the landscape. This review presents the opportunity to address this localised anomaly making the least impact and therefore amending the boundary to follow the existing field boundary in accordance with NPPF which would also ensure consistency with the Green Belt designation to the east of the borough boundary in Wyre Borough.</p> <p>Homes England are a public body sponsored by the Ministry of Housing, Communities and Local Government who aim to help deliver the homes that England needs. Further information can be found at: https://www.gov.uk/government/organisations/homes-england</p>

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		<p>The area also has a colony of Great Crested Newts which is a protected species; continual development in this area continues to compromise their habitat.</p> <p>The document states that Homes England can provide funding for the new Traveller Sites and pitches through Affordable Homes, where does this money originate from? Is it the taxpayer?</p> <p>Finally the Green Belt area in question marks the boundary between Wyre Borough and Blackpool Borough which has been argued in the past that the status would remain, therefore why should it be changed to create a site for a Gypsy Camp.</p>	
030	K Britton	<p>T1 - Faraday Way</p> <p>The issues I see are around traffic flow, alterations to green belt land, car parking issues and the infrastructure issues.</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016.</p>

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			<p>Therefore, there is no longer a need to identify such a site.</p> <p>In terms of the Green Belt boundary, the Council considers that the Local Green Belt Review Assessment provides a robust assessment and justification for the localised minor amendment to the Green Belt.</p> <p>The current green belt boundary close to Faraday Way adjacent to the Technology Park appears to cut across the field in an arbitrary nature and does not follow any physical features of the landscape. This review presents the opportunity to address this localised anomaly making the least impact and therefore amending the boundary to follow the existing field boundary in accordance with NPPF which would also ensure consistency with the Green Belt designation to the east of the borough boundary in Wyre Borough.</p>
031	D Marshall	<p>T1 - Faraday Way</p> <p>I wish to strongly object to the provision of a traveller site off Faraday Way. Consider that this area is entirely unsuitable for such a site.</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet</p>

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		<p>There are many other sites to the South of the town which would be more suitable such as closer to the existing traveller site. Please reconsider this site.</p>	<p>the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p>
032	L Alexander	<p>T1 - Faraday Way</p> <p>I object to the proposed ‘Gypsies, Travellers and Travelling Showpeople’ site on page 11 of the document.</p> <p>Firstly Faraday way is a very busy narrow main road with an already large number of dangerous business access points, which has been made more dangerous and busy with the re-location of the Post Office sorting office. There have been numerous accidents on this road due to parked cars due to lack of business parking already. From a health and safety perspective another access point along this road would make it all the more dangerous and I have grave concerns regards to horse welfare.</p> <p>I can’t see what can be gained from this proposal as the proportions of the site are unsuitable for this proposed use – the site is ridiculously small and narrow.</p> <p>Surely there are more private, less exposed and dangerous rural alternative options.</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p>

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033	J Gregson	<p>T1 - Faraday Way</p> <p>I am a resident on Westminster Gardens and wish to object to the proposed Gypsy site off Faraday Way.</p> <p>Please state this as an official objection to this site.</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p>
034	I Beech	<p>T1 - Faraday Way</p> <p>We would like to voice our concerns regarding this development. Our property is located opposite this proposed site in the borough of Wyre. Our main concern is the noise pollution that this site could produce, a few years ago there was a police investigation in that vicinity, generators were used and could be heard from our property due to the open fields between us and this proposed site. The police investigation also had floodlights, tents and diggers, this was all visible from the front elevation of our property. When purchasing our property we contacted Wyre council regarding the farm land opposite and were assured that this is green belt land and will not be developed. In the 6 years we have been</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p>

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		<p>living here the traffic has increased considerably, mainly due to the new housing off Faraday way and the Royal Mail site, we strongly feel the area cannot sustain any further development. Also of concern is the effect on the cows in the adjoining fields, migrating geese use these fields and birds of prey are nesting in this area.</p>	
036	Councillor M Vincent, Wyre Borough Council	<p>T1 - Faraday Way</p> <p>I make this representation as ward councillor for Carleton on Wyre Borough Council on behalf of myself and Cllr Ron Greenhough. I understand that Wyre Borough Council has also made representations or that they will do so.</p> <p>The site is extremely close to a site occupied by travelling communities in 2018 and this had a significant impact on the lives of the residents of Carleton and the wider surrounding area.</p> <p>Your description of the site is extremely limited and ignores how close to Carleton that it would be. No or no proper consideration appears to have been undertaken as to the impact of the site on the residents of Carleton or why the occupation of a similar site in 2018 was so negative and this should be undertaken before plans to utilise the site are taken forward, a proper and full assessment should be undertaken.</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p>

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		The site has been assessed in isolation. While the site itself may be suitable, and I have no comment to make on this having not seen the evidence, a wider impact study should be undertaken.	
037	L Carroll	<p>T1 - Faraday Way</p> <p>Please find my and my family's objection to the proposed site for a travellers site off faraday way and Carleton border.</p> <p>Consider that this proposed site near to Carleton is in totally the wrong area.</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p>
038	D Watts	<p>T1 - Faraday Way</p> <p>Concern expressed that this location is considered a suitable location for such development on such a lovely green area and next door to a green belt.</p> <p>In the documentation (proposals) it states that Wyre & Blackpool have the NEED to provide additional sites but Fylde don't - how can this be?</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016 (GTAA). Therefore, there is no longer a need to identify such a site.</p>

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		<p>As per normal with these things, I'm assuming that the proposers don't live anywhere nearby to the suggested site. Maybe we can suggest the site be located at the bottom of their garden or very near to where they live.</p>	<p>The GTAA sets out the identified need for traveller pitches and for travelling showpeople plots in Blackpool, Fylde and Wyre. Fieldwork was undertaken in all three authorities, but it did not identify a need for additional pitches and plots in Fylde. However, Fylde have granted permissions for traveller pitches, which are helping to address the sub-regional need.</p>
039	J Hitchon	<p>T1 - Faraday Way</p> <p>The proposed development will be situated under a Blackpool postcode (FY2) but it seems the land in question comes close to the boundary of Carleton (FY6) which is where I live.</p> <p>I do not think it's the appropriate location for such a site of this nature.</p> <p>Once the travellers become established I can foresee the surrounding fields to this site being under threat in the future, encroaching onto other land nearby.</p> <p>The question I have to ask is how we can be assured that numbers aren't going to grow in quantity at the site. We already experience the influx of travellers into the area on an annual basis when the Mondao Circus comes to town</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016 (GTAA). Therefore, there is no longer a need to identify such a site.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		for the summer months and set up at Norcross roundabout.	
040	A Garside	<p>T1 - Faraday Way</p> <p>I vehemently object to the proposal to setup a traveller site as per T1 of your Consultation paper.</p> <p>I feel the turnover of the green belt land for this purpose it yet further erosion of this area which is the home for wildlife roaming the area such as dear and barn owls.</p> <p>We simply should not allow erosion of green spaces in this way when there are areas setup and well established in the Marton area of the town which have not used green spaces but disused spaces.</p> <p>I feel you are running a large risk in establishing a traveller settlement in what is a busy area and opposite the central mail hub for Blackpool. If the travellers activity spills over the site this could have a detrimental effect on mail operations for the town and its economy. There are surely disused spaces in Marton that would put travellers am</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016 (GTAA). Therefore, there is no longer a need to identify such a site.</p>
041	I Beech & J Brooks	<p>T1 - Faraday Way</p> <p>We would like to voice our concerns regarding this development. Our property is located opposite this</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>proposed site in the borough of Wyre. Our main concern is the noise pollution that this site could produce, a few years ago there was a police investigation in that vicinity, generators were used and could be heard from our property due to the open fields between us and this proposed site. The police investigation also had floodlights, tents and diggers, this was all visible from the front elevation of our property. When purchasing our property we contacted Wyre council regarding the farm land opposite and were assured that this is green belt land and will not be developed. In the 6 years we have been living here the traffic has increased considerably, mainly due to the new housing off Faraday way and the Royal Mail site, we strongly feel the area cannot sustain any further development.</p> <p>Also of concern is the effect on the cows in the adjoining fields, migrating geese use these fields and birds of prey are nesting in this area.</p>	<p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p>
043	Mr and Mrs Moore	<p>T1 - Faraday Way</p> <p>We live in Carleton and have real concerns about the proposed development.</p> <p>We retired to this area, because it is a quiet residential area and this proposed development could have a</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		detrimental effect on this environment. We object strongly to this proposal.	and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.
046	D Edwards	<p>T1 - Faraday Way</p> <p>I object to the siting of affordable homes/pitches on the proposed Faraday Way site. Concerns are raised that the proposed allocation is in an employment and residential area and that there will be an impact on property values.</p> <p>The Westminster Gardens developers sought to build an access road connecting the East side from Tenyson Drive to Faraday Way; this was a key decision point when evaluating property purchase because it afforded easy access to Norcross and Amounderness way. However the Council rejected this on the basis it would cause congestion and hinder traffic flow. Yet now the Council are considering this Gypsy development. Surely it would create far more congestion and thus also has to be rejected.</p> <p>The proposed development is on Green Belt land. The UK policy and council policy requires that Green Belt development is exceptional rather than the norm, and that existing Brown sites/under developed sites be used. There are plenty of these sites in Blackpool – case in point being the derelict Mariners Bar land which has been</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p>

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		<p>underdeveloped for around two decades. This offers immediate development opportunity and avoiding</p> <p>Why do the travellers need bricks and mortar homes? This strikes of permanency and UK planning regulation requires a test to be applied to ensure travellers are exactly that. Otherwise the allocation of land is discriminatory to those awaiting affordable homes in which to take up permanent residence.</p>	
047	Councillor A Cross, Blackpool Council	<p>T1 - Faraday Way</p> <p>I have been asked by residents of Ingthorpe Ward to object to a proposal in the local plan consultation which puts a traveller and travelling showman site off Faraday way. Concerns have been raised over issues related to the temporary travellers on Moor Park last year. I have explained that planning decisions are not made on this basis but have since received legitimate concerns on planning grounds also.</p> <p>The site entrance proposed is on a bend where a previous traffic collision took place. This road has had significant traffic issues due to lorries travelling to parts of the business park along Faraday way and Moor Park Avenue. The traffic flow is made more difficult by those working at</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p>

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		<p>Hawking place having to park along Faraday way due to the lack of on site parking for these businesses. This clearly narrows the road, we cannot stop people parking here as it would displace it to residential areas in the immediate vicinity. These residential areas are already experiencing high volumes of non-residential traffic which are causing access issues, clearly we do not wish to add to this especially as a large number of properties in question are sheltered accommodation.</p> <p>The council Executive have just approved development of a site on Faraday way next to the new Royal Mail building. This means more traffic and more parking issues to add to the original issue and the travellers site again adding more difficulties.</p> <p>Alterations are constantly being made to our green belt and we do have protected wildlife in this area. This needs to be looked at carefully as we have already had issues with this on previous builds.</p> <p>Lastly I would also like to draw your attention to the makeup, infrastructure and future plans of the area that make this site inappropriate. We have had new family homes built at Westminster Gardens and All Hallows' road within Ingthorpe and a proposal to build a large number of new homes on the old Greenlands site. This presents a general infrastructure problem. There are no new schools,</p>	<p>Amendments to the Green Belt should only be made through the development plan process. The amendments proposed at Faraday Way do not amount to a strategic change. They will follow natural field boundaries and will actually result in a net gain of Green Belt in this location. The amended boundaries are justified in the Green Belt Review Assessment, do not undermine the purpose of the Green Belt and comply with the requirements set out in NPPF.</p> <p>The Infrastructure Delivery Plan will ensure that infrastructure needs of development set out in the Local Plan are considered. Where appropriate, contributions are sought for infrastructure in accordance with adopted Core Strategy Policy CS11: Planning Obligations.</p>

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		<p>new doctors, new shops in this area. We have an already struggling community which often is forgotten or labelled as the "leafy suburbs" when in fact we have some of the pockets of highest deprivation. The Kinraig estate containing our sheltered accommodation and the women's refuge present some of the town's most vulnerable people. In Ingthorpe just next to Kinraig estate we have one of our towns two extra care housing schemes. We have the old council estate and some BCH housing in the area of Bangor Avenue which is also home to some of the towns most deprived residents. These areas, all in Ingthorpe, access many public sector services and our local infrastructure is utilised by these residents the most. I would suggest this makes Ingthorpe and its surrounding areas inappropriate for extra strain on services and local infrastructure.</p> <p>I hope some of these points can be considered before the next part of the consultation. I also hope, along with any other objections raised, this will serve as useful information to dissuade the council from proceeding with the consultation and proposal around the travellers and travelling showman site in Ingthorpe.</p>	
049	P Sanday	<p>T1 - Faraday Way</p> <p>OBJECTION</p>	<p>The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>COMMENTS AND OBSERVATIONS</p> <p>I have looked on the internet for some facts regarding traveller sites in Blackpool and found the following comments from a Gazette report on 13 December 2018 regarding a planning application on Marton Moss (411 Midgeland Road) where the application had been deferred for further investigation.</p> <p>Coun Adrian Hutton said: "While we accept we need to find sites, we have had a number of experiences where we have granted these permissions with a set of conditions which are then blatantly ignored to the detriment of surrounding areas and residents. "</p> <p>The report also stated: The Fylde Coast Gypsy and Traveller and Travelling Show People Accommodation Assessment has shown six pitches need to be found, with two required in Blackpool.</p> <p>I then found the following report from 6 February 2019, again by the Gazette:</p> <p>Proposals to use land on Marton Moss in Blackpool as a travellers site have been approved after councillors received reassurances from the head of the family living there. Father-of-six Tommy Boswell, who had applied for permission to use the site at 411 Midgeland Road for two caravans and a chalet, told a meeting of Blackpool</p>	<p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p> <p>The comments reported in the Blackpool Gazette are noted.</p>

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		<p>Council's planning committee he wanted to move to the resort from Bury to give his wife and children a better life. He said: "When the opportunity to come here came up, I took it with both hands. "I just wanted to get my family right and do whatever I can do."</p> <p>The application, which also includes use of an existing two storey building for communal facilities, provision of four car parking spaces and associated landscaping, had been deferred from the December meeting of the committee. Councillors had raised concerns that planning rules were being flouted. Town hall planning officers had also visited the site on January 17 to gain reassurances about the use of the land. The meeting heard approving the scheme would help Blackpool meet the requirements of the Fylde Coast Gypsy and Traveller and Travelling Show People Accommodation Assessment.</p> <p>Whilst I understand the need to have a site in the north of Blackpool as well as the existing provision in the south, the proposed site seems very convenient for Blackpool Council as it sits right on the boundary with Wyre Borough Council. So, although the planned considerations say the site will be shielded from Faraday Way by 'existing vegetation should be used to provide a buffer between the site and Faraday Way' there is no mention of the inland side of the site</p>	

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		<p>which faces and indeed sits on the Wyre Borough boundary.</p> <p>If there is a need in Blackpool to find more space for a traveller site then Blackpool Council should be finding it within the borough, rather than on land bordering with a neighbouring authority.</p> <p>The Local Plan states that a number of Blackpool landowners have been approached for their land to be used for this purpose and none are prepared to give up their land for this use. To use this plot of land I would have thought that Blackpool should be entering into a conversation with Wyre before trying to inflict this on our Borough without negotiation. As far as I am aware, when a resident applies for planning permission, any effect on their neighbours is taken into consideration and as such Blackpool Council need to consider the effect on their neighbours.</p> <p>While I agree that a traveller site is better than having them pitching up absolutely anywhere, as I have seen on the pretty villages in Yorkshire and Cumbria around the time of Appleby Fair, as well as has happened locally, planners have to look at the bigger picture for the residents as well.</p>	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
051	Councillor Alan Vincent (Wyre)	<p>T1 - Faraday Way</p> <p>I wish to associate myself with the comments made to you by Carleton Ward Councillors Michael Vincent and Ron Greenhough regarding the proposal to site a traveller camp site on land adjacent to Faraday Way Blackpool which is close to a residential area of Carleton.</p>	Objection noted.
052	Ben Wallace MP	<p>T1 - Faraday Way</p> <p>I write in response to the Council's informal consultation on its draft site allocations and development management policies, which will form part of Blackpool Council's Local Plan.</p> <p>I note the Council's proposal to locate new Traveller and Travelling Showpeople sites on land to the east of Faraday Way. I understand that the Traveller site will include a minimum of two Gypsy and Traveller pitches (accommodating a total of four caravans), while the Travelling Showpeople site will include five plots.</p> <p>This site is located on the eastern boundary of Blackpool Council's area and the new sites will have as much impact on my constituency and the residents of nearby Carleton, as they will on Blackpool residents. I therefore request that you take into account the impact of the new sites, and particularly the large vehicles which will be accessing the site, on the local highway network in Wyre.</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p> <p>Regular planning meetings take place with Wyre Council as part of the Duty to Cooperate process and Wyre Council were informed about the potential allocation and consulted on the plan.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>I should be grateful if you would ensure that residents in Carleton (even though they are not Blackpool residents) and I are kept informed of any future consultations relating to this site.</p>	<p>Carleton residents and councillors who have made representations in relation to the plan will be kept informed of future consultations.</p>
053	Royal Mail	<p>T1 - Faraday Way</p> <p>Background Royal Mail owns and occupies the Long Leasehold of the Blackpool Delivery Office, Hawking Place, Blackpool FY2 0JN. The Delivery Office lies within very close proximity to the proposed allocation for a Traveller and Travelling Show people site.</p> <p>The property comprises one large industrial unit which is used by Royal Mail for a Sorting and Delivery Office.</p> <p>The Delivery Office (DO) is a strategically important asset for Royal Mail and in this case processes a volume of mail that can reach up to 800,000 items each week delivered across 6 different postcodes (Blackpool, South Shore, Poulton and Thornton Cleveleys areas). The Delivery Office employs 293 staff with seasonal increases to support the business at peak times of the year.</p> <p>The DO delivers every day, usually between the hours of 09.00-10.00 in the morning and 14.00-15.00 in the afternoon with the free movement of their vehicle fleet of</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p> <p>In terms of the Green Belt, the amendments proposed at Faraday Way do not amount to a strategic change. They will follow natural field boundaries and will result in a net gain of Green Belt in this location. The amended boundaries are justified in the Green Belt Review Assessment (2018), do not undermine the purpose of the Green Belt and comply with the requirements set out in NPPF.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>approximately 120 small derived styled vans that come in and out daily. The effective operation of the DO and the free movement of its delivery fleet of vehicles is critical to Royal Mail meeting its statutory duty to collect and deliver letters six days a week (and packets five days a week) at an affordable and geographically uniform price to every address in the UK.</p> <p>Representations Royal Mail welcomes the opportunity to review and respond to the Draft Site Allocations and Development Management Policies Document. Our representations are set out below in terms of what is needed to be considered for re-evaluation.</p> <p><u>Effective Operation of the Delivery Office</u> Royal Mail is concerned that the proximity of the proposed Traveller and Travelling Showpeople site will have a detrimental impact on the effective operation of the Blackpool DO. There would be a significant impact on the free movement of the delivery fleet due to the likely location of the site access, which would lead to conflict between vehicle movements of the Traveller and Travelling Showpeople community that would include large vehicles/trailers and Royal Mail’s delivery fleet. Ultimately, conflict of vehicular movement will cause delay in the free movement of the delivery fleet and therefore hinder the ability to meet statutory duties. Consequently, the increase</p>	

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		<p>in journey times that would result from this conflict will have direct adverse cost, time and environmental impacts for Royal Mail and more widely on Blackpool's economy.</p> <p>There are also road safety issues that need addressing, particularly for the Traveller and Travelling Showpeople community. Direct conflict between Royal Mail's delivery fleet and general vehicular traffic accessing the site will cause further issues and hinder the performance of Royal Mail but also may cause safety concerns for the travellers living on the site.</p> <p><u>Health and Wellbeing of the Traveller and Travelling Show people</u></p> <p>Royal Mail is also concerned that the operation of the Delivery Office, generally across a period of the day that includes very late evenings and the very early hours of the morning 6 days a week, will impact on the health and wellbeing of any future Traveller and Travelling Showpeople population should appropriate noise mitigation not be able to be incorporated into any future design of the site, which may or may not be able to be adequately provided. This is a particularly important issue for Royal Mail because noise complaints from residents can in some cases lead to legal sanctions, which may in turn compromise Royal Mail's ability to continue to operate effectively and efficiently and meet its statutory obligations from a particular Delivery Office. This can be</p>	

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		<p>the case where Royal Mail has operated from a site for a long period before new residential development is introduced in close proximity. It is for this very reason that the government has introduced paragraph 182 into the NPPF (agent of change principle) that states that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established; and where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed. Royal Mail does not believe that the Council has adequately considered the provisions of paragraph 182 of the NPPF in proposing to allocate the Traveller and Travelling Show People site directly adjacent to the Blackpool DO.</p> <p><u>Taking into account Reasonable Alternatives</u> Royal Mail does not believe that the Faraday Way site is the only and most appropriate site in the Local Authority area to provide for this specific housing requirement. The Council should not simply dismiss land with potential for traveller pitches and plots at Marton Moss because a separate Neighbourhood Plan process is to be undertaken. This is due to the provisions of paragraph 65 and 66 of the NPPF that states that strategic policy-making authorities</p>	

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		<p>should establish a housing requirement figure for their whole area, and within this requirement, a housing requirement for designated neighbourhood areas should also be provided. This figure should consider factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority. Furthermore, the Council's consultation documentation identifies that the existing Traveller Community perceives Marton Moss as a good location for plots and pitches, as well as there being other landowners within the Marton Moss area who have suggested that they have land that has potential for Traveller pitches and plots as an alternative use. Without adequately considering land at Marton Moss, the council's current proposal to allocate the site at Faraday Way is not considered to be positively prepared or justified within the context of paragraph 35 of the NPPF.</p> <p>Conclusions In summary, our representations set out the Royal Mail's primary concerns arising from the Draft Site Allocations and Development Management Policies – Informal Consultation Paper Document. Whilst Royal Mail understands the Council's growth ambitions and the need to have a framework in place to guide the future development of Blackpool, the Council should acknowledge the importance of Royal Mail as an employer</p>	

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		<p>and strategic operator, and the need to ensure the long-term retention of the DO for the benefit of Blackpool's economy.</p> <p>Without further evidence to justify very special circumstances to alter the Greenbelt boundary and the proper and full consideration of the ability to make provision for the Traveller and Travelling Showpeople community at Marton Moss, the proposed allocation of land at Faraday Way is neither justified or positively prepared as required by paragraph 35 of the NPPF, which will impact on the soundness of the final Site Allocations and Development Management Policies.</p> <p>Furthermore, Royal Mail does not believe that the Council has adequately considered the provisions of paragraph 182 of the NPPF in terms of the impact of the existing DO and the Health and Wellbeing of the future Traveller and Travelling Show People population.</p> <p>On this basis, Royal Mail therefore respectfully requests that the Council reconsiders the location of the Traveller and Show People site currently proposed for land off Faraday Way, and strongly suggest that the Council explores potential locations at Marton Moss to meet its obligations as set out in paragraphs 65 and 66 of the NPPF.</p>	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
054	County Councillor A Clempson, Lancashire County Council	<p>T1 - Faraday Way</p> <p>I am writing to you in my capacity as the County Councillor for Poulton-le-Fylde in response to the Council's informal consultation on its draft site allocations and development management policies, which will be part of the Council's Local Plan.</p> <p>The Council's proposal to locate new Traveller and Travelling Show people sites on land to the east of Faraday Way concerns me greatly because of the potential impact it may have on the residential areas over the Wyre boundary which includes the County Division of Poulton-le-Fylde.</p> <p>Representing the authority which is responsible for Highways, my main concern is the impact it could have on the already busy highway infrastructure.</p> <p>Carleton is a small area and I would like to highlight the fact that Wyre Council has highlighted an area for a large development on Blackpool Road in their local plan. Going forward, I would request that Wyre Council and Blackpool Council work together to highlight all concerns and the joint impact these potential developments would have.</p> <p>I look forward to taking a full part in the Council's formal consultation in order to highlight the concerns of the residents of Poulton and the communities which are</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p> <p>Regular planning meetings take place with Wyre Council as part of the Duty to Cooperate process and Wyre Council were informed about the potential allocation and consulted on the plan.</p> <p>Wyre residents and councillors who have made representations in relation to the plan will be kept informed of future consultations.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>situated just over the Wyre border. With this in mind, could I please request to be kept fully updated on this issue.</p>	
056	P Maynard MP	<p>T1 - Faraday Way</p> <p>I am writing to you in response to the published consultation paper on the Blackpool Local Plan. I am aware of proposals to designate a plot of land off Faraday Way for use as a site to accommodate travellers and the travelling show community.</p> <p>I am aware there is a need in every local authority area to provide such facilities. Equally, I am of the belief that the location in Faraday Way, on greenbelt land in the middle of a business development is not a suitable location. I recognise the concerns of residents living close to the proposed site and of the business community in the north of Blackpool, and would like to register my concern also. It is my belief that provision is adequately catered for within the borough of Blackpool and the allocation of land in Faraday Way for such purposed would be detrimental to residents and businesses within my constituency.</p> <p>I hope you will consider this my response to the consultation exercise and trust the concerns of my constituents will be taken into account before any final decision is made.</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p> <p>All residents and other parties who have made representations in relation to the plan will be kept informed of future consultations.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
063	A Tonks	<p>T1 - Faraday Way</p> <p>I would like to object to the proposed Travellers settlement off Faraday Way because consider it to be incompatible with the surrounding area.</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p>
069	L Snaith	<p>T1 – Faraday Way</p> <p>Raises concerns regarding building an industrial estate with no parking.</p> <p>All the cars are parked on the pavement as it is, trying to drive down Faraday way is just ridiculous now, and that is for cars when a commercial vehicle has to go down it becomes dangerous. How there hasn't been any accidents or fatality is amazing. Raises concerns about putting a traveller and showman 's site on the same badly throughout industrial estate. Suggests an assessment of the area, it is also a school run for Moor Park school to Carleton school it is a reel rat run a serious accident waiting to happen, and on a night-time it is a racing track</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p> <p>With respect to accidents, an examination of road traffic collision records does not indicate a high level of collisions on Faraday Way.</p>

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		and time trials track, for boy racers, with cars with no silencers.	The issue of the behaviour of drivers is a matter for the Police.
070	H Stephens	<p>T1 – Faraday Way</p> <p>Raises concern about the impact of proposed allocation.</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p>
071	Wyre Council	<p>T1 – Faraday Way</p> <p>Wyre council is concerned that the identification of the land at Faraday way for use by Gypsies and Travellers and by travelling showpeople fails to meet the requirements of Planning Policy for Traveller Sites, on the basis that it has not been demonstrated that the subject site is an appropriately suitable location for the uses proposed for the reasons set out below:</p> <p>1. The site lies in a location isolated from other residential development. This does not promote peaceful and integrated co-existence between the site and the local</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p>

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		<p>community as per Planning for Traveller Sites (PPTS) paragraph 13(a).</p> <p>2. The site is located in a commercial area with employment uses to the south and west of the site. The use to the west is a post office facility which can be expected to be the location of considerable vehicle movements each day. Given the sensitive nature of caravan living, it is not clear that the council has undertaken any assessment of the impact – particularly in terms of noise, vehicle emissions pollution, and hours of operation – on the future residents of the proposed site. This does not provide for proper consideration of the effect of local environmental quality on the future occupants and users of the site as per Planning for Traveller Sites (PPTS) paragraph 13(e).</p> <p>3. The site is heavily vegetated. Whilst not a site designated for its ecological value, no assessment has been made of any ecological impact and whether or not this impact can be mitigated.</p> <p>4. The sustainability of the site is questionable. The consultation document sets out in Appendix C3 and C4 a scoring matrix which provides a means of assessing accessibility in relation to a number of criteria, including distance to local schools, health services and recreational provision. Aggregating the scores for each criterion gives</p>	

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		<p>an accessibility level for each site (rated as high, medium and low).</p> <p>Putting aside the fact that this does not account for the directness and quality of the route from a site to the service/facility in question, it is not clear if the accessibility of the subject site has been assessed and, if it has, what the outcome is. However, given the fact that the subject site is relatively isolated for a residential development, it is noted that there appears to be limited local health provision whilst the nearest local primary school is some 1km to the south of the site with no direct bus service.</p> <p>5. The consultation document states that site suggestions at Marton Mere are more appropriately assessed through a neighbourhood plan for that area. However, the logic of this approach is that the local plan is failing to give proper consideration to what may be a more appropriately located site.</p> <p>6. It is not clear if the proposed site itself has been the subject of consultation with the Gypsy and Traveller community and its representatives or with the showpeople and their representatives and has their support. As such, aside from matters of funding, it is not clear that the proposed site is deliverable.</p>	

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		<p>7. The consultation document does not clarify what arrangements will be made to ensure that the site is appropriately managed.</p> <p>To conclude, is not clear from the evidence that the Faraday Way site is the most appropriate location for the uses proposed and that other locations are not better suited in terms of site specific circumstance, sustainability and compliance with the spirit and detail of the guidance contained in the PPTS.</p>	
072	N Dawson	<p>T1 – Faraday Way</p> <p>I have concerns about the proposed plans to build a traveller site on Faraday Way.</p>	<p>Noted. The Council is no longer proposing to allocate this land as a traveller and travelling showpeople site in the Local Plan Part 2.</p> <p>Since February 2019 sufficient permissions for traveller pitches and travelling showpeople plots have been granted in Blackpool and Fylde to meet the sub-regional requirement set out in the Gypsy and Traveller Accommodation Assessment 2016. Therefore, there is no longer a need to identify such a site.</p>
General Allocation Comments			
015	Historic England	The NPPF makes it clear that the significance of heritage assets can be harmed through development within their setting. There is a requirement in the Town and Country Planning Act 1990 that ‘special regard’ should be had to the desirability of preserving listed buildings, their setting	<p>Comments noted.</p> <p>In June/July2019, the Council’s Conservation Officer undertook a Heritage Impact Assessment for the proposed site allocations identified by</p>

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		<p>or any features of special architectural or historic interest which they possess. It is also the duty of the Council to preserve or enhance the character or appearance of its conservation areas and their setting. Where potential development sites appear to include non-designated assets including the possibility for archaeology, their potential should be investigated and retention/exploration should be promoted.</p> <p>Consequently, before allocating any site there would need to be some evaluation of the impact, which the development might have upon those elements that contribute to the significance of a heritage asset including their setting, through undertaking a heritage impact assessment. The assessment of the sites needs to address the central issue of whether or not the principle of development and loss of any open space is acceptable. It needs to evaluate:</p> <ol style="list-style-type: none"> 1. What contribution the site in its current form makes to those elements which contribute to the significance of the heritage assets. For a number of these heritage assets, it might be the case that the site makes very little or no contribution. 2. What impact the loss of the area and its subsequent development might have upon those elements which contribute to the significance of those heritage assets. 	<p>Historic England as having the potential to harm the historic environment, heritage assets and their setting. The issues raised are dealt with under the specific allocations to which they refer.</p> <p>Regarding archaeology, the Lancashire County Council Archaeological Team have appraised each of the proposed allocations. They have identified any known archaeology, assessed the archaeological potential and recommended where further archaeological work may be required prior to development. This information is summarised for each allocation in the key development considerations set out in Schedule 1 of the Local Plan Part 2.</p>

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		<p>3. If it is likely to result in harm, how might that harm be removed or reduced to an acceptable level.</p> <p>4. If the harm cannot be reduced or removed, what are the public benefits that outweigh the presumption in favour of the conservation of the heritage asset?</p> <p>The selection of sites for development needs to be informed by an up-to-date evidence base and the Plan should avoid allocating those sites which are likely to result in harm to the significance of the heritage assets of the Plan area. Where adverse impacts are unavoidable, the Plan should consider how any harm might be mitigated. This could include measures such as a reduction of the quantum of development at a site, amending the types of development proposed or locating the development within another part of the site allocation. Such initiatives need to be fully justified and evidenced to ensure that such measures are successful in reducing identified harm.</p> <p>The allocation of sites for development may also present better opportunities for the historic environment. For example, new development may better reveal the significance of heritage assets or may provide an opportunity to tackle heritage at risk.</p> <p>Where relevant, policies for allocated sites may need to make reference to identified historic environment</p>	

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		<p>attributes in order to guide how development should be delivered. For example, this might require the policy to include detailed criteria or providing supplementary information with the supporting text.</p> <p>In view of the above, Historic England is concerned that there does not appear to be any assessment of the historic environment to accompany the development options in order to determine whether they are suitable for development both within a sustainability appraisal or the evidence base. The Part 2 Appendices does not contain any assessment of the impact the allocations will have on the historic environment. The Plan needs to be accompanied by evidence which looks at the allocation and whether the site can accommodate the proposed quantum of development without harm to the significance of the asset and its setting.</p> <p>The following sites have the potential to harm the historic environment, heritage assets and their setting and therefore need to be addressed through a heritage impact assessment before being included within the next stage of the Local Plan.</p>	
021	Lancashire Wildlife Trust	Be aware that some allocations adjoin, or are in close proximity to, Biological Heritage Sites and other sites notified for their wildlife value (Marton Mere SSSI, LNR).	Noted. Sites have been subject to preliminary ecological appraisal work by the Greater Manchester Ecology Unit (GMEU) and potential impacts on designated sites have been considered. Where further ecological surveys are

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		<p>Specifically, H17 and H22 adjoin Marton Mere. H3 is close to Devonshire Road Rock Gardens and H1 & H2 close to Queens Promenade Coastal Grassland. H20 is separated from Rough Heys by Yeadon Way.</p> <p>If these sites are eventually brought forward for development, it will be important to consider species choice in landscaping (biodiversity benefits, sustainability in a coastal environment (esp. H1 & 2) and to avoid the use of invasive non-native species (e.g. Japanese Rose – a landscaping favourite).</p> <p>Appropriate boundary treatment will be required where the housing sites directly adjoin wildlife sites.</p> <p>You might find it of interest to download a PDF copy of 'Homes for People and Wildlife' – how to build housing in a nature friendly way from The Wildlife Trusts' website: https://www.wildlifetrusts.org/planning</p>	<p>recommended to support planning applications these are referred to in the key development considerations for the sites set out in Appendix 1 of the Local Plan Part 2.</p> <p>The importance of species choice in landscaping is reflected in the proposed landscaping policy in the Local Plan Part 2. This states that development must ensure that the design and layout of a site retains and protects the distinguishing landscape features, trees and hedgerows and wherever possible enhances them through increased tree and shrub cover including soft edge and transitional areas of planting, prioritising the use of native species.</p>
Suggested Allocations			
003	Shepherd Planning on behalf of Denmack Holdings	<p>Former Baguleys Garden Centre Site</p> <p>The former Baguleys site on Midgeland Road is not included in the housing site allocations.</p>	<p>Permission for housing was granted on this site in April 2019 (Application 18/0642), but for 12 dwellings instead of 22. The permitted site will contribute towards meeting Blackpool's housing requirement as set out in Core Strategy Policy CS2: Housing Provision.</p>

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		<p>The site has previously benefitted from outline approval (12/0894) for up to 36 dwellings and a reserved matters approval (16/0196) for 22 dwellings on the site.</p> <p>The outline approval features in the Blackpool deliverable housing supply document (April 2015 – March 2020) as site SS076. There is a current application (18/0642) submitted for 22 dwellings which was submitted before the expiry of the approval 16/0196.</p> <p>This site should be included in the Local Plan Part 2 as an allocated housing site. It has previously been considered to be acceptable (in the above 2 documents) and as it is in a sustainable and accessible location relative to facilities, school (junior and high), shops and places of employment and bus routes, it should be allocated.</p>	<p>As this site lies within Marton Moss it is covered by Policy CS26: Marton Moss, which promotes a neighbourhood plan approach for the area and does not support any housing allocations unless these emerge through the neighbourhood planning process. No housing allocations are proposed within Marton Moss in the Local Plan Part 2 and therefore this site is not proposed as an allocation.</p>
007	E Parkinson	<p>Land at Chapel Road</p> <p>My brother and I own five acres of land at Chapel Road which was originally part of Runnel Farm. We wish this land to be put on the register for development as it is un-farmable for various reasons. We hope that this can be borne in mind when any proposed development is imminent_in_the future.</p>	<p>Chapel Road is covered by Policy CS26: Marton Moss. CS26 promotes a neighbourhood plan approach for the area and does not propose any housing allocations on the Moss unless this emerges through the neighbourhood planning process from the community. No housing allocations are proposed within Marton Moss in the Local Plan Part 2 and therefore this site is not proposed as an allocation.</p>

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			<p>In March 2019, the Marton Moss Neighbourhood Forum and the Neighbourhood Area were officially designated and the Forum is currently preparing a neighbourhood plan for the area. This site was submitted for consideration by the landowner as part of the 2017 Call for Sites exercise. The promoters of land for development at Marton Moss have been advised to engage with the Forum regarding the potential for housing allocations within the neighbourhood plan.</p>
045	Valad European Diversified Fund	<p>Festival Leisure Park</p> <p>Valad propose the allocation of Festival Leisure Park for leisure and complementary food and drink uses.</p> <p>The leisure park has been in situ since the late 1990s and is centrally located, within close proximity of Blackpool Town Centre and the Resort Core.</p> <p>It is currently in an edge-of-centre location for the purposes of the sequential test and, with the town centre in walking distance, it presents the opportunity for linked trips. The town centre offer will expand further southwards towards the leisure park in the future with a site earmarked for the new £300m leisure development, Chariot of the Gods, within 300m to the north of the</p>	<p>The Council considers that Festival Leisure Park is in an 'out of centre' location.</p> <p>The Council do not consider it appropriate to allocate the site for leisure use. The Council's strategy is to direct leisure uses to the Town Centre and Resort Core as set out in policies CS4: Retail and other town centre uses and CS21: Leisure and Business Tourism of the Local Plan Part 1: Core Strategy. Any applications should be assessed against the NPPF and relevant Core Strategy Policies including CS4 and CS21.</p>

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		<p>leisure park. The existing cinema and associated facilities contribute to the leisure offer of Blackpool and should be supported as such in planning policy.</p> <p>The land immediately to the south of Festival Leisure Park was previously allocated as a key tourism investment site under Policy RR6 of the Local Plan (2006), noting it would “provide an obvious and sensible focus for developing proposals to accommodate major new tourism development”. The policy was deleted in 2008 and the site has since been developed for the Fox Hall Village housing development, but this area remains easily accessible and suitable for leisure uses. It highlights that the LPA have previously considered this location to be appropriate for such leisure and tourism uses.</p> <p>Valad are promoting the development of a new bingo hall and drive-through restaurant/ café at Festival Leisure Park. The application was recommended for approval by officers but refused at committee in 2018. An appeal is pending determination by the Planning Inspectorate. The household survey undertaken in support of the new Retail, Leisure and Hotel Study (June 2018) identified there is potentially a need for a new bingo hall to serve Blackpool but a “lack of commercial desire” to open new bingo halls.</p> <p>However, Club 3000 Bingo have been searching for a site to deliver a purpose-built Bingo Hall in Blackpool since</p>	<p>It is worth noting that the land allocated in 2006 and subsequently deleted in 2008 was for land that <u>did not</u> include festival leisure park. The associated policy (RR8) supported a <u>Major</u> Tourism Developments with other supportive Major Tourism Development reflecting the adopted Blackpool Resort Masterplan which is no longer a relevant consideration with the ambition to provide a tourist attraction that would have a ‘broad family appeal’.</p> <p>With respect to the ‘need’ for a new Bingo Hall, for clarity the Retail Study 2018 at Section 8.3 states: <i>‘There is a lack of commercial desire to open new bingo halls and from a qualitative point of view, given the commercial realities of the tourism industry, the offer within Blackpool is sufficient to meet the participation rates identified in the household survey alone. However, the figures provided in the tables do not take account of additional visits from tourists. Given the demographics of visitors to Blackpool, there is likely to be a relatively high level of additional visits from tourists to the existing bingo hall (and particularly the Mecca Bingo on Talbot Road, given its central location), which could support the requirement for additional provision in the town centre should an</i></p>

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		<p>2016. Their search has concluded that Festival Leisure Park is the best location to meet this identified need. Such a use needs to be supported by complementary facilities such as cafes/ restaurants.</p> <p>Festival Leisure Park has been proven to be the only suitable and available site to accommodate such a proposal, and this should therefore be allocated for such uses in the Blackpool Local Plan Part 2. This would ensure the Local Plan is positively prepared and justified.</p>	<p><i>operator be forthcoming in this market. If a new facility were to come forward, it would be important to offer a qualitatively different format to that which is already provided by Mecca in a suitable and sustainable location’.</i></p>
057	Pavilion Property Trustee Ltd	<p>Clifton Retail Park</p> <p>The Retail Park is located approximately 5km south east of Blackpool town centre and includes Next, Matalan, Clarks and a 150,000sqft gross Tesco Extra store. It is has excellent access onto Clifton Road, which connects to Preston New Road and the M55.</p> <p>The Blackpool Retail, Leisure and Hotel Study 2018 identifies that the Clifton Retail Park is the second most popular out-of-centre retail destination for the purchase of comparison goods in the Blackpool borough, achieving a comparison goods spend of £44.2m per annum (a 5% share of all comparison spending locally). The Tesco store within the Retail Park is the main destination for convenience retailing within the Borough, with an estimated turnover of</p>	<p>For clarification Clifton Retail Park is identified as an out of centre destination and is not identified within the existing retail hierarchy as set out in adopted Core Strategy policy CS4.</p> <p>The Council do not consider it appropriate to allocate the site as a ‘commercial centre’. The Council’s strategy is to direct retail leisure uses to the Town Centre and Resort Core as set out in policies CS4: Retail and other town centre uses and CS21: Leisure and Business Tourism of the Local Plan Part 1: Core Strategy. Therefore any such allocation would be contrary to the Core Strategy. Any applications should be assessed</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>£59.8m per annum which represents a 9% share of convenience spending locally.</p> <p>Clifton Retail Park is therefore acknowledged as a well-established retail location within the existing retail hierarchy. It provides an important shopping function within the local retail hierarchy, with scope for the development of a further range of uses including, but not limited to, bulky goods, ancillary food and drink/drive through restaurant opportunities and the introduction of trade counter uses.</p> <p>Retail Capacity</p> <p>We are aware that the Blackpool Retail, Leisure and Hotel Study 2018 identifies that there is no immediate capacity for further comparison goods floorspace within the Borough, with extant permissions expected to absorb surplus expenditure capacity in the short term (a deficit of –£14.6m at 2017 is identified once the turnover requirements of planning commitments are taken into account). It is however material that spending on comparison goods is forecast to grow over the next plan period, with a requirement for between 7,700 - 12,800 sq.m comparison goods floorspace emerging across the Borough by 2027. This rises to between 18,300 sq.m and 30,600 sq.m at 2032 (table 7.7 of Blackpool Retail, Leisure and Hotel Study 2018).</p>	<p>against the NPPF and relevant Core Strategy Policies including CS4 and CS21.</p>

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		<p>While this residual comparison goods expenditure capacity for new floorspace is intended to be directed to vacant and underused property within Blackpool Town Centre, we contend that Clifton Retail Park will continue to have an important role to play in the retail provision for local residents, particularly in the context of a volatile retail marketplace. Indeed, it is relevant that the Blackpool Retail, Leisure and Hotel Study 2018 acknowledges that the retail sale of bulky electrical goods such as household appliances typically requires large amounts of floorspace that are not usually available in town centre locations. The study therefore recognises the important role of out-of-centre bulky goods retailing in providing a complementary offer to town centres.</p> <p>Site Allocation Notwithstanding the acknowledged significance of the Clifton Retail Park as a retail destination, it is not formally identified in the draft Part 2 document for any particular use. The existing allocation as part of the wider Urban Area is therefore intended to prevail, with general development management policies applying to any further retail or commercial proposals at the Retail Park. We also note that the area immediately surrounding Clifton Retail Park is allocated for employment growth.</p>	

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		<p>We do not consider that the existing or proposed policy position is sufficient to support managed change at Clifton Retail Park over the next plan period. We are therefore of the strong professional opinion that Clifton Retail Park should be identified as a 'Commercial Centre' within the emerging Local Plan Part 2. This reflects its current operation and will allow new commercial uses to be promoted.</p> <p>South Blackpool is a target for regeneration within the Local Plan and we consider that widening the uses at the Retail Park would contribute positively to the wider area. Part 1 of the Local Plan states that there is a desire to ensure a balanced approach to regeneration and growth with sustainable development that meets the needs of Blackpool's people now and into the future. Creating a positive planning policy position which is supportive of a mix of additional bulky goods, food/drink and trade counter uses at the Clifton Retail Park will contribute to future investment within the area.</p> <p>The Blackpool Core Strategy reflects the main theme of the NPPF that there should be 'a presumption in favour of sustainable development'. In terms of plan-making, paragraph 14 of the NPPF states that local planning authorities should positively seek opportunities to meet the development needs of their area, with an emphasis on Local Plans having sufficient flexibility to adapt to rapid</p>	

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		<p>change. The NPPF stresses the Government’s commitment to securing economic growth and paragraph 19 indicates that the planning system should do everything it can to support sustainable economic growth.</p> <p>Allocation of the Clifton Retail Park as a Commercial Centre will enable growth and diversification in a way that can respond to changes taking place in the retail and leisure industries allowing a suitable mix of uses. This can be seen in the majority of retail parks around the country where other uses, including drive through facilities for example, are now an important part of the consumer offer and an integral to a continuing successful retail operation.</p> <p>Conclusion It is considered that Clifton Retail Park should be afforded a formal allocation within the Local Plan as a ‘Commercial Centre.’ This will reflect its current operation and allow a number of new commercial uses to come forward, including, but not limited to, bulky goods, ancillary food and drink/drive thru opportunities and trade counter uses.</p>	
055	P Wane	Call for sites form submitted for land at Avondale, Rough Heys Lane	Housing figures have been updated for the Publication version of the Local Plan and sufficient provision has been found to meet the housing requirement for the remainder of the plan period, including an allowance for slippage, without the allocation of this site.

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			<p>The site has been assessed in terms of its availability, suitability and achievability. Direct access to the site is from Rough Heys Lane, which at this point is unadopted and very narrow. Land Registry records indicate that this part of Rough Heys Lane is privately owned, but not by the owners of the site. Therefore, there are concerns about site access from Rough Heys Lane in terms of availability, suitability and achievability.</p> <p>Alternative access to the site would be through Council owned land to the west. This land is proposed housing allocation HSA1.12 (Land at Rough Heys Lane), which is accessed from Rough Heys Lane before it becomes privately owned and narrows significantly. However, proposed allocation HSA1.12 cannot be accessed from the north because there is a narrow strip of land in private ownership, which restricts access from Ravenglass Close.</p> <p>The site lies within Flood Zone 1, which indicates that it is at low risk of flooding from rivers. However, Environment Agency mapping indicates that much of the site is at risk of surface water flooding; the risk is mostly low, but there are some</p>

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			smaller areas of medium and high risk. Therefore, flood risk mitigation measures may be required.
General			
018	Network Rail	<p>(1) The Local Plan part 2 from Blackpool Council allocates sites for development with appropriate policies. There are 2 sites adjacent to the Blackpool-Preston line (H4 Bromley Close, 12 flats and H5 Warley Rd 14 dwellings). In order to comply with the DMPO the council will need to consult Network Rail on these proposals.</p> <p>(2) The council already has sites permitted, provided or windfall for 3380 dwellings. The total number of dwellings for LPPT2 is 1074.</p>	Comments noted.
019	Strategic Land Group	<p>Table 2 of the consultation paper list 22 sites which, between them, are expected to deliver some 1056 homes over the remainder of the plan period. In addition to these, paragraph 2.12 identifies a further 150 dwellings which 'are being promoted' in Blackpool Town Centre. Together this produces a supply of 1206 dwellings compared to the remaining target of 1074 homes (a surplus of 132 homes or just over 12%).</p> <p>A brief analysis of the sites highlights potential challenges to delivery:</p> <ul style="list-style-type: none"> 91 homes are proposed on sites with expired planning permissions, withdrawn applications or 	<p>The assumptions in relation to delivery and capacity are based on available evidence, including information from parties responsible for housing delivery. The Publication version of the plan is informed by updated evidence in relation to the sites and supported by an updated Strategic Housing Land Availability Assessment. Further detail on the approach taken is provided in the Housing Topic Paper.</p> <p>In terms of the sites highlighted, the Council is no longer proposing to allocate site H1 (Former Filling Station at Norbreck Castle), H15 (Tram Depot,</p>

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		<p>long standing un-implemented permissions (H1, H2, H4, H5 and H11). That calls into question whether those sites are actually deliverable.</p> <ul style="list-style-type: none"> • 100 homes are proposed on the current tram depot site (H15), with the commentary provided stating that ‘Relocation options have been considered, but movement off the site is unlikely in the short term’. It goes on to suggest that only partial relocation might be possible. As it is unknown whether relocation of the depot will take place, the availability of the site for development is clearly questionable. • 34 home are proposed on the current ambulance station at Parkinson Way (H18), where the supporting commentary states that the ambulance service is ‘looking at options to relocate’ before going on the note that ‘if relocation occurs...’ The availability of this site for development must therefore also be questioned. <p>In total, therefore, there are 225 homes – almost 20% of the total allocations – which might not actually be capable of being delivered.</p> <p>For the eventual Site Allocations plan to be found sound, either further evidence will be required to demonstrate that those sites will deliver, or alternative sites will need to</p>	<p>Rigby Road) and H18 (Ambulance Station, Parkinson Way) for housing.</p> <p>Sites H2 (Former Mariners Public House), H4 (Land at Bromley Close) & H5 (land to the rear of Warley Road) are vacant sites where residential development is being pursued by the landowners. Site H11 (190 – 194 Promenade) is currently in use as a car park, but was previously subject to a planning application for residential use and there is current landowner interest in residential development of this site in the medium term.</p> <p>Housing figures have been updated for the Publication version of the Local Plan and sufficient provision has been found to meet the housing requirement for the remainder of the plan period.</p>

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		be found – even if that means co-operation with neighbours.	
020	Home Builders Federation	<p>The HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that all the sites contained within the plan are deliverable over the plan period and planned to an appropriate strategy.</p> <p>The HBF would expect the spatial distribution of sites to follow a logical hierarchy, provide an appropriate development pattern and support sustainable development within all market areas.</p> <p>The Council's assumptions on sites in relation to delivery and capacity should be realistic based on evidence supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data.</p>	<p>Comment noted. The proposed housing sites are considered to be deliverable over the plan period. The spatial distribution of the sites is in accordance with the adopted Core Strategy and ensures a balanced approach to regeneration and growth within the town.</p> <p>The assumptions in relation to delivery and capacity are based on available evidence, including information from parties responsible for housing delivery. The Publication version of the plan is informed by updated evidence in relation to the sites and supported by an updated Strategic Housing Land Availability Assessment. Further detail on the approach taken is provided in the Housing Topic Paper.</p>
024	Department for Education	We would like to reiterate the point we made during our submission (paragraph 10) to the July 2017 Reg 18 Consultation, which requested that the Community Facilities Section of the document cover specifically the need to ensure that sufficient land is allocated to allow for the development of new schools and the expansion of existing schools, where necessary.	The Council's school place planning team are fully aware of the Local Plan Part 2 and the number of dwellings proposed. These figures have been factored into the calculations for school places within Blackpool. In June 2019 the Council issued a School Organisation Pupil Place Plan for the period 2020 – 2028. This considers school places, taking account of proposed housing growth.

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		<p>The Infrastructure Delivery Plan (IDP, Nov 2014) indicates there are no major issues with education provision – with the town’s primary schools being well located across Blackpool’s neighbourhoods to meet existing demand. However, we note that there are some capacity issues within some schools in south Blackpool, and that the IDP indicates these issues can be addressed through the expansion of existing schools. Whilst the Blackpool Local Plan Part 2: Proposed Site Allocations and Development Management Policies document does not include allocations for schools, it would be helpful if the plan outlined how the additional demand created by (very modest) housing growth will be accommodated by existing schools, and indicated any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary.</p>	<p>In the primary sector the Pupil Place Plan concludes that sufficient places currently exist, but that the forecast reduction in pupil numbers means that there is likely to be an oversupply of primary places, particularly in the south of the town.</p> <p>In the secondary sector the Pupil Place Plan concludes that the continued availability of places in Lancashire secondary schools helps to mitigate against the current shortfall of Year 7 places. Blackpool’s Year 7 numbers are predicted to continue to increase until 2025, and alongside housing growth across the border, there will be a potential shortfall in Year 7 places for one or more years, before numbers start to reduce. Additional capacity for Year 7 intakes may be required for a short period of time. The Council will seek opportunities to unlock existing capacity within the school building estate to address this need.</p> <p>In the special sector the Pupil Place Plan highlights the extra capacity provided by the new Lotus School. No action is recommended to further increase capacity, although this will be carefully monitored.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
			Taking account of the Pupil Place Plan, it is not considered necessary to allocate additional land to allow for the development of new schools, or the expansion of existing schools in Blackpool.
044	Fylde Council	<p>Gypsies and Travellers and Travelling Showpeople</p> <p>The Part 2 document identifies a net need for two pitches, taking account of permissions granted in Fylde that provide for needs across the sub-region. The document identifies a site suitable for the pitches required.</p> <p>Fylde Council supports the approach Blackpool Council have taken both to the calculation of the requirement and to the methodology for site selection and allocation.</p>	Support noted.
066	Environment Agency	<p>Contaminated land</p> <p>Given the previous land uses of site allocations H1, H15 and H18, there may be contamination issues which have the potential to impact controlled waters. This is identified in the site assessments for H1 and H15, but not for H18.</p>	Noted. The Council is no longer proposing to allocate Site H18 (Ambulance Station, Parkinson Way) as a housing site in the Local Plan Part 2.
075	Highways England	Part 2 of the Local Plan needs to allocate additional sites for housing development to achieve the housing requirement over the remainder of the plan period. This equates to 820 dwellings, but to take into account any identified sites where development does not come	Comments and Support noted.

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>forward as expected a 10% buffer has been applied to allow for development slippage, which equates to 2541 dwellings. Therefore Part 2 of the Local Plan needs to identify additional sites to accommodate approximately 1,074 dwellings.</p> <p>Potential housing allocations sites are included in the consultation document and are subject to a minimum site threshold of five units. The potential housing sites identified provide for around 1,2062 dwellings and comprise 22 sites (1,056 dwellings), as well as some housing development (150 dwellings) as part of mixed used proposals on two strategic sites in Blackpool Town Centre. Most of the 22 sites are under 1 hectare, with the exception of sites listed in Table 2. Site H22 is located nearest to the SRN.</p> <p>Of the 22 sites, 15 of these are located on brownfield, 4 are greenfield and 3 are a mixture of brown and greenfield. Approximately 835 dwellings are identified on brownfield land (69%) and 371 on greenfield land (31%).</p> <p>It is noted that the Council also propose to allocate the new build sites with planning permission of five or more dwellings in Part 2 of the Local Plan, to ensure the principle of housing development is maintained on these sites in case the permission lapses.</p>	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		Highways England supports development located on sites within the Blackpool Central Area that can be accessed using sustainable transport, with a variety of local employment opportunities available for residents. In addition, we acknowledge that the principle of housing development has already been accepted on the sites with extant planning permission. Highways England also note that a site within Marton Moss was promoted as a potential housing site, with gypsy/traveller use suggested as an alternative, and that this may be considered as part of the neighbourhood planning approach, rather than through this plan.	

Proposed Designations

Countryside Area

044	Fylde Council	<p>The proposal to retain designation of the area between Newton Hall and Mythop Road as countryside, forming a buffer between Blackpool and Staining in Fylde, is supported. Consideration could be given to designate all or part of this area as Green Belt, given that it adjoins the existing Green Belt in Fylde.</p> <p>Fylde Council considers that this area requires a strong level of protection from development, given the pressure for development that exists in Staining. Policy DM32, which provides criteria for development in the countryside, is supported.</p>	<p>Support noted. The Council considers that this would form part of a strategic review of the Green Belt due to size of the area involved and its relation to the wider Green Belt in Fylde and Wyre. This will be considered through the Duty to Co-operate when the Local Plan Part 1: Core Strategy is reviewed.</p> <p>Support for Policy DM32 noted.</p>
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Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
068	K Beardmore	<p>The Countryside Policy Area comprises of a thin strip of countryside between Newton Hall and Mythop Road and is adjacent and to the east of Marton Mere Nature Reserve (LNR & SSSI) and Herons Reach Golf Resort which covers a far more substantial area of greenspace than the countryside policy area (see figure 3).</p> <p>In the 'Housing Supply Update and Site Allocations Assessment' document, the Council reject the site as a potential housing allocation because:</p> <p><i>“Not proposed for allocation in the Local Plan Part 2. This land is currently a designated Countryside Area and this designation is proposed to be taken forward in the Local Plan Part 2. Residential use would extend the built-up area into this designated area and harm the character and appearance of this limited resource in Blackpool.”</i></p> <p>The Countryside Policy Area is a saved policy (Policy NE2) from the 2006 Local Plan and identifies the function of the countryside policy area is <i>“to retain their existing rural character and prevent urban expansion”</i>. The preamble to the policy describes this policy area as having a similar role to that of green belt. The focus of this text is on Marton Moss and not the area in which our site sits. By virtue of this definition, the village of Staining is not urban, and the purpose of the countryside policy area would appear to be in containing growth on the east of Blackpool, which</p>	<p>The proposed area of Countryside is the only remaining countryside area in the Borough and is predominantly in agricultural use adjoining extensive areas of open countryside in neighbouring Fylde Borough. The area forms a buffer between Staining and Blackpool and has an open character comprising open fields and Biological Heritage Sites.</p> <p>The potential for development of the land west of Staining village, was considered at the Issues and Options Stage of the adopted Blackpool Local Plan Part 1: Core Strategy but was discounted in favour of protecting the character of this area of countryside and focussing development in the more central areas of the town and lands to the south.</p> <p>The Inspector for appeal ref: APP/J2373/A/14/2219739 confirmed the area's rural character - <i>‘Broad Oak Lane is relatively narrow, has no footway and is edged by trees and high hedges giving it a very rural character.’</i></p> <p>He further stated <i>‘Given the sporadic and isolated nature of the properties to the west of the appeal site, and the dense area of trees and shrubs to the</i></p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>releasing our client’s site from the policy designation, and allocating for housing, would not impact upon.</p> <p>The site is well contained by the existing residential development in Staining, with development on three sides. Only the northern boundary does not abut the settlement edge. It should be noted that a number of dwellings continue and extend eastwards along Broad Oak Lane in a ribbon style development pattern further extending the built form beyond our site to the east. In effect, development of the site would reflect infill development.</p> <p>The site does not perform a countryside function in respect of the countryside policy area designation as it will not extend the settlement of Staining into open countryside and is effectively enclosed by existing development. In this context, the built form would not extend beyond Eddleston Close to the north east, the dwellings on Broad Oak Lane to the west and the dwellings off Lodge Close to the south.</p> <p>The relationship of these build lines is indicated in Figure 4. These are indicated in the aerial map, as is the clear distinction between our client’s site and the agricultural fields beyond. There would be limited impact on the policy designation.</p> <p>The removal of the site from the countryside policy area designation would not cause a reduction in the perceptible</p>	<p><i>south, I am not persuaded by the appellant’s argument that the seven bungalows would be infill development. The proposal would be an urban extension of the settlement into the designated area of countryside, the character and appearance of which would be significantly harmed’.</i></p> <p>The Inspector concluded that the development would extend the urban settlement into a designated area of countryside and would harm the character and appearance of this limited resource within Blackpool Borough. As such the proposal would not represent sustainable development.</p> <p>There have been no changes to the appearance and value of this area of countryside and as such it is reflected by the support for this continued designation from neighbouring Fylde Council.</p> <p>Taking account of the above there is significant evidence that support the continued designation of this area as Countryside.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>width of the strip because as already noted, existing built form already extends eastwards from the site along Broad Oak Lane despite these dwellings being ‘washed over’ by the policy designation. If the site is released from the countryside policy designation, the should also be amended to reflect the existing built form to the west along Broad Oak Lane.</p> <p>The removal of the site from the countryside policy designation would strengthen the policy constraint on the remaining designation because the site has clearly defined boundaries and would not require any further alterations to this boundary in this plan period.</p> <p>Our client appealed the decision to refuse planning permission in 2013 (ref: 13/0605) and at Paragraph 28 of appeal decision (Ref:2219739), the Inspector determined the site to be “<i>a reasonably sustainable location</i>”. The appeal was dismissed due to the context of the countryside policy designation; however, the argument being presented by our client, is that the site should be removed from the policy designation for the reasons outlined above, and would, therefore, not have an impact upon this designation.</p> <p>In summary, the site does not perform the function of the wider countryside designation and should be excluded from this Policy (Policy NE2). Furthermore, the relationship between the site and the existing settlement pattern of</p>	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		Staining makes the site ideally suitable as a location for new homes.	
Local Centres			
048	Melrose Pension Fund	<p>The local impact threshold relating to local centres raises the question of whether the designation of “local centres” in the Local Plan is appropriate and justified by the evidence.</p> <p>The local centres designations are carried forwarded from the 2006 Blackpool Local Plan. No evidence is readily available to examine how centres were assessed and designated in the 2006 Plan and it has been noted that the designations were not scrutinised when preparing the Core Strategy.</p> <p>The Council’s Local Centres Assessment forms part of the evidence base for the Local Plan Part 2. Having regard to the definition of “town centres” in the glossary to the NPPF (referred to above), the Local Centre Assessment has not addressed the question of whether a centre can legitimately be designated as a “local centre” or whether the “centre” is no more than a small collection or parade of shops of no more than local significance.</p>	<p>The Council considers that the designation of the Local Centres in Blackpool’s appropriate considering particular geographical circumstances being a compact built up area and the important role these centres play in providing important shopping and services for residents.</p> <p>The recognition of Blackpool’s retail hierarchy is set out in adopted Core Strategy policy CS4:</p> <p><i>‘ At the local level, the Borough is supported by various District and Local Centres (Figure 13) which play a vital role in providing the quality and range of shops and other services for the day to day needs of the local communities they serve.</i></p> <p><i>In determining development proposals, the Council’s objectives are to sustain and enhance the vitality and viability of Blackpool Town Centre and the supporting District and Local Centres. The majority of the town’s shopping floorspace is located in these centres and they are readily accessible by residents and visitors by various methods of transport.</i></p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>There are currently 46 local centres designated which range from the largest, Central Drive, with 72 units and Dickson Road with 71, to Cromwell Road and Easington Crescent where there is only 1 unit. (It is acknowledged that the Local Plan Part 2 proposes to remove the local centre designations from Cromwell Road and Easington Crescent).</p> <p>There are 17 local centres with less than 10 units; 19 centres with between 10 and 20 units; and 9 local centres with more than 20 units. The benchmark as explained in the Local Centres Assessment is a group of at least 4 shops. It also indicates that a local centre may be a small range of shops of a local nature serving a small catchment. That description of a local centre does not sit comfortably with the NPPF definition which expressly excludes small parades of shops of purely neighbourhood significance.</p> <p>The policy implications of so many “local centre” designations, in a relatively small geographical area is there is substantial overlap in the areas the centres serve and no focus on locations where investment and resources would serve the community best. This is not consistent with NPPF paragraph 85. Consequently, the Local Plan Part 2 should take a more selective approach to the designation of local centres and allocations should not be made where the number of commercial units in a location is less than ten.</p> <p><u>Summary</u></p>	<p><i>Figure 14 shows the location of Blackpool’s retail centres across the Borough. The Local and District Centres’ boundaries are to be reviewed in the Site Allocations and Development Management DPD.’</i></p> <p>The 2006 designations were used to form the basis of the Local Centre Review. Comprehensive assessments were undertaken as part of the Review. The approach taken is not dissimilar to the approach taken by neighbouring authorities Fylde and Wyre who have recently adopted their Local Plans after being found sound by the Planning Inspector.</p> <p>Noted. This is set out in the Local Centres Assessment. The Paper sets out proposals to remove/amend a number of designations from a variety of centres across the Borough.</p> <p>There is no set methodology to define a local centre. The assessment is clear in what is considered to be a local centre in Blackpool’s context. The approach is very similar to that taken by neighbouring Fylde and Wyre which have recently been found sound by the Planning</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		The designation of local centres is not consistent with national policy and therefore is not sound. This is because the “centres” include small parades of shops of only neighbourhood significance. The designation of “local centre” should be removed from the 17 locations whether there are less than 10 units.	Inspector. There is nothing to suggest that a Local Centre has to be a minimum of 10 properties. The Council considers the proposed designated Local Centres are underpinned by robust evidence in the form of the Local Centres Review 2019. There is nothing to suggest that a Local Centre has to be a minimum of 10 properties.
Green Belt			
053	Royal Mail	Royal Mail does not believe that the evidence presented in the consultation documentation adequately justifies very special circumstances to alter the green belt boundary at this location, noting that MHCLG guidance identifies that Traveller sites (temporary or permanent) in the Green Belt is inappropriate development. This evidence should include clear information in relation to the site search and site evaluation that led to the council selecting Faraday Way as the preferred location. Without this evidence it is considered that the proposed allocation of the Faraday Way site is not justified within the context of paragraph 35 of the NPPF.	Comments noted. The Council considers that the Local Green Belt Review Assessment provides a robust assessment and justification for the localised minor amendment to the Green Belt.
071	Wyre Council	The consultation paper makes the argument that the boundary of the Green Belt at Faraday Way contains anomalies in the location of Faraday Way and site T1	The Council considers that the Local Green Belt Review Assessment provides a robust assessment and justification for the localised minor amendment to the Green Belt.

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>referred to above and that these anomalies should be rectified by both deletions and additions to the Green Belt.</p> <p>It is proposed in the consultation document that the Green Belt in the vicinity of site T1 should follow the eastern edge of land in question. However the evidence base supporting the consultation document does not appear to consider an alternative approach whereby the boundary of the Green Belt at this point becomes the eastern edge of Faraday Way– this would create an obvious, clear, permanent and defensible boundary with site T1 and land directly to the north rightfully perceived as part of the broader swathe of open land separating the urban area of Blackpool and Poulton-le-Fylde in Wyre.</p>	<p>The current green belt boundary close to Faraday Way adjacent to the Technology Park appears to cut across the field in an arbitrary nature and does not follow any physical features of the landscape. This review presents the opportunity to address this localised anomaly making the least impact and therefore amending the boundary to follow the existing field boundary in accordance with NPPF which would also ensure consistency with the Green Belt designation to the east of the borough boundary in Wyre Borough.</p>

Chapter 3: Proposed Development Management Policies

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
Policy DM1: Housing Development in Residential Gardens, Infill and Backland Sites			
020	Home Builders Federation	This policy sets criteria for the development of residential gardens or infill and backland sites. The HBF have concerns over the particularly restrictive nature of this policy. The HBF recommend that the Council consider a more flexible approach for the policy, considering the benefits of developing well located, sustainable sites which could contribute to the delivery of homes.	<p>Paragraph 70 of the NPPF confirms that plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area. Blackpool is the most densely populated authority outside of London. The Green and Blue Infrastructure Strategy and Technical Report identifies a shortfall in green infrastructure in Blackpool, noting that residential gardens make an important contribution towards green infrastructure in the town. Given the shortage of green infrastructure in Blackpool, the loss of relatively small residential gardens for housing development would fly in the face of the wider efforts to green Blackpool. Furthermore, Blackpool has a legacy of poor quality, cramped housing development on backland and infill sites, and so the Council considers that a policy outlining design requirements for new housing is both appropriate and necessary.</p> <p>With respect to the Publication Version of the Local Plan Part 2, DM1 has been amended and combined with DM5 and now entitles DM1: Design Requirements for all new build housing. A new</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
			Policy DM2 relates to residential annexes in gardens.
065	McCarthy and Stone	<p>We are concerned with the wording of part 1d of this policy which states that it should be ensured that: <i>“garden areas reflect the size of those in the surrounding area”</i>.</p> <p>Naturally, where development causes harm to the local area it should not be permitted, however there are cases for the development of residential gardens where development would not have a harmful effect on the character and appearance of the area, for example as part of a redevelopment through a residential land assembly, which would include garden areas but resulting in higher density and more sustainable development as advocated by the current NPPF (2019). It is submitted, that this policy as drafted may preclude the delivery of windfall sites and be inappropriately used by objectors, possibly delaying or preventing the redevelopment of a residential garden that may deliver highly sustainable development and avoid the need for redevelopment on greenfield or greenbelt land.</p>	<p>Blackpool is the most densely populated authority outside of London. The Green and Blue Infrastructure Strategy and Technical Report identifies a shortfall in green infrastructure in Blackpool, noting that residential gardens make an important contribution towards green infrastructure in the town.</p> <p>Para 70 of the NPPF confirms that plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area. Para 122 of the NPPF states that planning policies and decisions should support development that makes efficient use of land, taking into account of the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change.</p> <p>With respect to the Publication Version of the Local Plan Part 2, DM1 has been amended and combined with DM5 and now entitles DM1: Design</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
			<p>Requirements for new build housing. A new Policy DM2 relates to residential annexes in gardens.</p> <p>Policy DM1: Design Requirements for New Build Housing Development has been amended to say <i>'Private amenity space should be at least the equivalent size of the footprint of the house or reflect garden sizes in the area'</i> to allow more flexibility.</p>
Policy DM2: Housing for Older People			
020	Home Builders Federation	<p>This policy states that on new build sites of 10 dwellings or more at least 20% of dwellings should be accessible and adaptable in accordance with M4(2) or M4(3).</p> <p>The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG.</p> <p>PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs</p>	<p>The NPPF states that planning policies should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.</p> <p>Blackpool Council's published Older Person's Accommodation Strategy identifies a shortage of specialist housing stock across the Borough and states that the number of residents over the age of 65 is projected to rise by 28% by 2037, making up 26% of the town's population by 2037. This Strategy confirms that there are a higher proportion of people over the age of 65 living in Blackpool than the national average and concludes that the demand from older people for health, social care and housing related services is rising significantly and services will struggle to cope unless this demand is</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Blackpool which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommend that an appropriate transition period is included within the policy.</p> <p>The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances; and that policies for wheelchair accessible homes should only be applied to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.</p> <p>Part 2 of this Policy and Policy DM3 relate to accommodation for older people, the HBF would recommend that the Council give further consideration to the wide spectrum of housing and care provision available for older people and consider how these policies may apply. The Council will be aware that Extra Care developments may fall within class C2 or C3 dependent on the level of</p>	<p>addressed by enabling more people to help themselves through (amongst other things) housing that promotes independence.</p> <p>Furthermore, much of the housing stock in Blackpool, particularly in the Inner Area, comprises Victorian terraces with small yards which are unsuitable for adaptation for wheelchair access.</p> <p>The policy requirement for accessible and adaptable homes has been viability tested as part of the 2020 Local Plan Viability Study and has been amended in line with the recommendations of the Study. The 20% requirement has now been changed to 10% in Policy DM1: Design Requirements for New Build Housing Development.</p> <p>Policy DM3 is now entitled DM3: Supported Accommodation and Housing for Older People and recognises the wide spectrum of housing and care provision available for older people.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>care that they provide, therefore it is considered it may be appropriate to assess each older person accommodation scheme on its own specific characteristics.</p>	
064	Rowland Homes	<p>Policy DM2 sets out Blackpool’s approach to housing for older people. The draft policy states that on new build sites of 10 dwellings or more, at least 20% of dwellings should be accessible and adaptable in accordance with technical standard M4(2) or suitable for wheelchair users in accordance with M4(3) of the Building Regulations (or as updated).</p> <p>Rowland recognises that the needs of older people should be accommodated; however there currently appears to be a lack of supporting evidence to explain how the specific requirement for 20% of dwellings to be accessible and adaptable has been arrived at.</p> <p>Rowland reserves the right to comment in further detail on the Council’s proposed requirements for accessible and adaptable dwellings at the relevant time, however, would not support any policy requirements that would threaten the viability/ deliverability of the site or other sites in the Borough.</p>	<p>The NPPF states that planning policies should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.</p> <p>Blackpool Council’s published Older Person’s Accommodation Strategy identifies a shortage of specialist housing stock across the Borough and states that the number of residents over the age of 65 is projected to rise by 28% by 2037, making up 26% of the town’s population by 2037. This Strategy confirms that there are a higher proportion of people over the age of 65 living in Blackpool than the national average and concludes that the demand from older people for health, social care and housing related services is rising significantly and services will struggle to cope unless this demand is addressed by enabling more people to help themselves through (amongst other things) housing that promotes independence.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
			<p>Furthermore, much of the housing stock in Blackpool, particularly in the Inner Area, comprises Victorian terraces with small yards which are unsuitable for adaptation for wheelchair access.</p> <p>The policy requirement for accessible and adaptable homes has been viability tested as part of the 2020 Local Plan Viability Study and has been amended in line with the recommendations of the Study. The 20% required has now been reduces to 10% in Policy DM1: Design Requirements for New Build Housing Development.</p>
065	McCarthy & Stone	<p>We commend the Council for taking a consistently positive approach in seeking to provide appropriate accommodation to meet the needs of its ageing population in Policy DM2. We consider that the best approach towards meeting the diverse housing needs of older people is one that encourages <i>both</i> the delivery of specialist forms of accommodation such as sheltered / retirement housing and Extra Care accommodation <i>and</i> a separate requirement for homes to be built to a standard that is <i>suitable</i> for the elderly, or easily altered to be suitable for the elderly.</p>	Support noted.

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
Policy DM3: Residential Institutions			
065	McCarthy and Stone	<p>We commend the Council for taking a consistently positive approach in seeking to provide appropriate accommodation to meet the needs of its ageing population in <i>Policy DM3</i>, however this policy misses the opportunity to support the provision of Extra Care and Assisted Living (C2) accommodation.</p> <p>Para 3.30 states that “most new development proposals will be for the provision of care accommodation for the elderly.” However, the benefits of Extra Care Accommodation are increasingly being identified as a modern and sensible choice for those who wish to move into housing with a combination of accommodation with integrated care and support services. National Planning Practice Guidance (NPPG) has identified that the need to provide housing and extra care accommodation for older people is ‘critical’ given the projected increase in the number of households aged 65 and over accounts for over half all new households, and the benefits that accrue from “downsizing” in the local housing market. It is suggested that the policy is amended to support the provision of Extra Care accommodation.</p>	<p>Comments noted. Policy DM3 is now entitled DM3: Supported Accommodation and Housing for Older People and recognises the wide spectrum of housing and care provision available for older people.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		It has become increasingly accepted that specialist housing for the frail elderly has beneficial impacts on mental and physical health, safety and security, enabling older people to live independently and continue or resume daily activities with greater confidence and sense of wellbeing. Studies show that the mental, emotional and physical health of residents often improves following a move to specialist accommodation. Extra Care can be an excellent option for people with care needs. The benefits of all forms of specialised housing are broader than the availability of care: security and companionship are valued by older people and have a positive impact on health - particularly mental health - and wellbeing.	
Policy DM4: Student Accommodation			
No comments received			
Policy DM5: Design Requirements for New Build Housing Development			
020	Home Builders Federation	<u>NDSS</u> This policy states that as a minimum, all new dwellings must meet the Nationally Described Space Standard (NDSS). The NDSS as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they	Blackpool has a legacy of small, poor quality housing which is widely acknowledged. In response to this, the Council adopted floorspace standards for residential conversions in its New Homes from Old Places SPD (NHFOP) in 2011. These standards were in part superseded by the NDSS through adoption of Core Strategy in 2016.

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>were introduced on a ‘need to have’ rather than a ‘nice to have’ basis.</p> <p>PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that ‘where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:</p> <ul style="list-style-type: none"> • Need – <i>evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.</i> • Viability – <i>the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.</i> • Timing – <i>there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’.</i> 	<p>Furthermore the Council has consistently been supported at appeal in relation to floorspace standards, particularly in the Inner Area where deprivation levels are high and housing standards are particularly poor.</p> <p>The policy requirement for NDSS has been viability tested as part of the 2020 Local Plan Viability Study and has been amended in line with the recommendations of the Study. The requirement has now been changed to read ‘As a minimum, 20% of all new build dwellings on a site must meet the Nationally Described Space Standard (or any future successor)’</p> <p>In addition the Space Standards Topic Paper sets out the evidenced to support the requirement for NDSS.</p> <p>With respect to comments on renewable and low carbon energy, Policy DM1 has been viability tested and has been amended to read ‘Encouragement is given to the minimisation of end-user energy requirements over and above those required by the current building regulations through energy reduction and efficiency measures on all residential schemes.’</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>The Council will need robust justifiable evidence to introduce any of the optional housing standards, based on the criteria set out above. The HBF consider that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional.</p> <p><u>Electric Vehicle Charging</u> This policy also requires provision to be made for charging points for electric vehicles in accordance with DM Policy 39. The HBF have provided comments in relation to Policy DM 39 below.</p> <p><u>CO₂ Reductions</u> This policy requires major new build residential development schemes outside of the defined inner area will be required to reduce CO₂ emissions further by at least 20% via the use of renewable and / or low carbon energy generation sources providing this is practical and viable.</p> <p>The HBF is generally supportive of the use of low carbon and renewable energy, however, it is queried whether this policy is in line with the Governments intentions as set out in Fixing the Foundations, the Housing Standards Review and</p>	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>the PPG, which specifically identified energy requirements for new housing development to be a matter solely for Building Regulations with no optional standards.</p> <p>The Government has sought to set standards for energy efficiency through the national Building Regulations and to maintain this for the time being at the level of Part L 2013. The WMS published on 25 March 2015 sought to clarify the regulatory regime. At that time the Government decided to improve energy efficiency for residential buildings through Part L of the Building Regulations. The starting point for the reduction of energy consumption should be an energy hierarchy of energy reduction, energy efficiency, renewable energy and then finally low carbon energy. The HBF consider that Policy DM5 should allow developers flexibility to select the most appropriate way to achieve the general aims of this policy. For example, it is possible that the general aims of the policy can be achieved by a fabric first approach using the integration of passive design, fabric specification and thermal efficiency measures to reduce energy usage without resorting to renewable energy generation.</p>	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
021	Lancashire Wildlife Trust	<p>There is no requirement to have regard to the ecological value of sites or the need to enhance biodiversity in this Policy however DM20 Landscaping does cover it. Would suggest that a cross reference to DM20 is required.</p> <p>Again, the Homes for People and Wildlife’ – how to build housing in a nature friendly way document from The Wildlife Trusts’ would be highly relevant.</p>	<p>Comment noted. Reference is now made to DM21: Landscaping in the DM1: Design Requirements for New Build Housing.</p> <p>The Council has also introduced Policy DM36: Biodiversity which requires net biodiversity gains in new development.</p>
064	Rowland Homes	<p>Rowland generally supports the introduction of measures aimed at achieving high quality design such as those in policy DM5. However, there currently appears to be a lack of supporting evidence to explain how specific requirements have been arrived at, notably the garage dimensions set out at point 6.</p> <p>Rowland reserves the right to comment in further detail on the Council’s proposed design requirements for new build housing developments at the relevant time, however, would not support any policy requirements that would threaten the viability / deliverability of the site or any other sites in the Borough.</p> <p>In addition, the design requirements should be considered with regard to the overall viability of</p>	<p>The Fylde Coast authorities adopted the internal dimensions for garages for household extensions in the Extending Your Home SPD in 2007.</p> <p>In recent decades, car sizes have increased noticeably whilst the size of domestic garages have remained unchanged. Many domestic garages constructed as part of recent developments are inadequate to accommodate modern cars, consequently resulting in garages not being used for their intended purpose and resulting in cars being parked on streets which weren’t designed to accommodate high volumes of on-street parking. Additional justification has been included in the policy.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>housing developments. Core Strategy Policy CS14 (Affordable Housing) includes a mechanism to allow an alternative/level of provision to be negotiated where it is robustly justified through the submission of a viability appraisal, that meeting the requirements (30% for developments of 15 dwellings or more) would render a development unviable.</p> <p>There should be a similar mechanism within Policy DM5 to relax the specific requirements such as the provision of EV charging points and fixed garage dimensions if it proved to be unviable.</p>	<p>A garage needs to be of a sufficient size to accommodate a family car, a charging point and cycle storage. Please refer to appendix C1.</p> <p>Environmental protection is at the heart of the Governments Industrial Strategy, which includes support for zero-emission vehicles, and measures to tackle local air pollution. This is echoed in the Governments 25 Year Environment Plan.</p> <p>Para 105 of the NPPF confirms that residential and non-residential development should provide an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles. Para 110 states that in assessing specific applications for development, it should be ensured that development is designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.</p> <p>NPPF paragraphs which talk about affordable housing suggest a flexible approach depending on viability. Para 105 and 110 doesn't include the same flexibility.</p> <p>The requirement for new development to make provision for charging electric vehicles has been removed from this policy and is now covered in</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
			DM41: Transport Requirements for New Development and Appendix C1.
065	McCarthy and Stone	<p>This policy states that as a minimum, all new dwellings must meet the Nationally Described Space Standard (NDSS). The NDSS as introduced by Government are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis.</p> <p>The Council will need robust justifiable evidence to introduce any of the optional housing standards, based on the criteria set out above. McCarthy and Stone support the HBF's representation on this matter and consider that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional.</p>	<p>Blackpool has a legacy of small, poor quality housing which is widely acknowledged. In response to this, the Council adopted floorspace standards for residential conversions in its New Homes from Old Places SPD (NHFOP) in 2011. These standards were in part superseded by the NDSS through adoption of Core Strategy in 2016.</p> <p>The policy requirement for NDSS has been viability tested as part of the 2020 Local Plan Viability Study and has been amended in line with the recommendations of the Study. The requirement has now been changed to read 'As a minimum, 20% of all new build dwellings on a site must meet the Nationally Described Space Standard (or any future successor)'</p> <p>In addition the Space Standards Topic Paper sets out the evidenced to support the requirement for NDSS</p>

Policy DM6: Residential Conversions and Sub-divisions

No comments received

Policy DM7: Provision of Employment Land and Existing Employment Sites

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
064	Rowland Homes	<p>The Core Strategy sets out a requirement for 31.5 hectares employment land over the plan period to 2027, plus approximately 14 hectares of employment land in Fylde provided through the Duty to Cooperate and 7 hectares of additional employment land is to come forward at the Blackpool Airport Enterprise Zone, which together amounts to an employment land requirement of 52.2 hectares. It is, however noted in paragraph 3.94 of the consultation paper that the main industrial/business areas identified in Policy DM7 amount to around 182 hectares of employment land. Clearly, this far exceeds the requirement for employment land needed in the Borough and it is not therefore necessary for all the sites in Policy DM7 to come forward for employment uses.</p> <p>Furthermore, the total employment land requirement and the employment land supply are not clearly set out within the consultation paper. For clarity, the table within Policy DM7 should be amended to clearly show the total supply of available employment land against the total employment land requirement, rather than simply stating this in the supporting text.</p> <p>In this context, despite being proposed as a potential site for residential development in the</p>	<p>To clarify the issues raised, it should be noted that the 182 hectares identified includes existing safeguarded previously developed employment land as well as developable employment land.</p> <p>The proposed available land figure of 3.8 hectares at the NS&I site was included in error. The 'Available Land' has been amended to 0. The employment land allocation in the policies map will only cover the remaining National Savings and Investment offices.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>consultation paper, the site is also covered by draft Policy DM7 (Provision of Employment Land and Existing Employment Sites) which identifies the site as an existing employment site suitable for B1(a), B1(b) or B1(c) use. The text in Policy DM7 states that on such sites: <i>“Proposals for non-B uses will not be permitted except in specified locations in other policies”</i>. This wording means that a residential allocation in the Local Plan Part 2 would make residential development on the site acceptable despite the site being identified as an existing employment location under policy DM7. However, Rowland considers that for clarity, a more robust approach would be to simply not include the site as an existing employment site in Policy DM7.</p>	
075	Highways England	<p>Policy CS3 of the Core Strategy identified the requirement to safeguard around 180 hectares of existing business/industrial land for employment use, and to enhance these sites with new employment development on remaining land and through opportunities for redevelopment. Policy DM7 of the Local Plan Part 2 provides detail on the appropriate uses within these identified business/industrial areas</p>	Comments noted.

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		It is noted that these sites are currently defined on the 2006 Local Plan Proposals Map and will continue to be defined on the Policies Map that will accompany Local Plan Part 2.	
Policy DM8: Blackpool Airport Enterprise Zone			
004	Trams to Lytham	<p>I support the statement that access to the Enterprise Zone by sustainable modes of transport is a key requirement.</p> <p>In particular, even though the development might be outside Blackpool Council's boundary, the proposed installation of a passing loop to increase railway service frequency on the South Fylde Line as set out in other council documents should not compromise the development of light rail options to extend the tramway along this corridor.</p> <p>A light rail/tram scheme encompassing the railway and/or the Enterprise Zone would provide a highly sustainable option to promote further development within the site and is achievable within the local plan period. There is additional potential to provide park and ride services and to increase connectivity to the wider Fylde Coast.</p> <p>While I widely support the policy, I would like to suggest that these light rail options are specifically referred to by name and safeguards put in place, as</p>	<p>Support and comments noted.</p> <p>Developing a light rail/tram scheme will take considerable resources including funding which are not currently available, therefore the Council does not consider that such a scheme is achievable within the current plan period which ends in 2027. Therefore it is considered not appropriate to make reference to a light rail/tram scheme at this stage before preliminary work has been undertaken. The Council will remain responsive to any changing circumstances when the Core Strategy is reviewed in 2021.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		expansion of the tram system along the southern corridor is referred to in several important planning documents across Blackpool Council and other local authorities including LCC and FBC.	
019	Strategic Land Group	<p>The Strategic Land Group welcomes the proposed policy in respect of the Blackpool Airport Enterprise Zone. The EZ has the potential to contribute significantly to the Blackpool economy as well as to the wider Fylde Coast region. We note that paragraph 3.103 identifies the potential of the EZ to attract 180 businesses and create 3000 jobs over its lifespan.</p> <p>To ensure that the EZ is able to deliver on its potential, care needs to be taken to ensure that the necessary infrastructure is in place to support delivery – within both Blackpool and the wider Fylde Coast. That will require particular consideration of matters such as transport infrastructure and ensuring that there is adequate supply of premises for support services to those businesses. In addition, it is crucial to ensure that there is an adequate supply of new homes to help facilitate that level of employment growth.</p>	<p>Support noted.</p> <p>The lifespan of the EZ is some 25 years commencing in 2016 and the creation of 3000 jobs covers this time period which equates to around 120 jobs per annum. However it should be noted that not all 3000 jobs are new to Blackpool and Fylde with the EZ assisting in safeguarding jobs in the sub region by providing appropriate site relocation. In addition, the EZ lies within both Blackpool and Fylde local authorities and the job generation needs to be considered within this context.</p> <p>With respect to infrastructure the Masterplan identifies the need to ensure the necessary infrastructure is in place and this includes highways, drainage and utilities infrastructure. Funding has been made available, some £28 million for the period 2018 to 2021, to ensure the infrastructure is delivered.</p> <p>Support services for the business community has been specifically considered and DM8 provides for</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
			<p>such facilities as set out in point 3.c) and d) of the policy with further guidance provided in the supporting text.</p> <p>With respect to the adequate supply of new homes as stated above, not all the jobs created at the EZ will be new jobs and generate the need for new housing. The Core Strategy which was adopted in 2016 provides for some 280 new dwellings per annum for the plan period 2012 to 2027. In addition, the Core Strategy will be reviewed in 2021 and will ensure that a continued adequate supply of housing in Blackpool will be delivered.</p>
044	Fylde Council	Fylde Council is supportive of Policy DM8 which is reflective of the Draft Masterplan produced jointly by Blackpool and Fylde Councils, including the enabling development of the housing site H21.	Support noted.
064	Rowland Homes	<p>Policy DM8 protects the designation of the Blackpool Airport Enterprise Zone (EZ) and supports its delivery.</p> <p>Whilst not directly relevant to the NS&I site, Rowland fully supports Policy DM8 and the delivery of the EZ, which is critical to meet Blackpool's need for employment land, create jobs, stimulate</p>	<p>Support and comments noted.</p> <p>The remaining land at the former NS&I site is proposed for housing as set out in Site Allocation H22 of the Informal Consultation Paper January 2019 and HSA1 of the Publication Version of the Local Plan.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>economic growth and attract investment. The area is already well-established as a hub for business and commercial activity and is well located with excellent access to the M55. Rowland fully supports the Council's aspirations that the EZ will attract an additional 180 businesses and create 3,000 new jobs over its 25-year lifespan. In addition, the Eckersley Report, attached at Appendix 3, notes that the EZ offers a number of opportunities such as local businesses financial help, new infrastructure projects to relieve traffic congestion and infrastructure and marketing funding.</p> <p>In this context, as set out in the Eckersley Marketing Report at Appendix III, the NS&I site is at a clear disadvantage to the Blackpool EZ in terms of attracting businesses. This is yet another reason why the site should be allocated for residential development.</p>	
066	Environment Agency	<p>As part of the design framework we recommend that reference to biodiversity net gains are included in addition to green infrastructure and the links between the two are made.</p> <p>See also comment regarding Policy DM33.</p>	<p>The links between biodiversity net gain and green infrastructure are referred to in Core Strategy Policy CS6: Green infrastructure.</p> <p>Policy DM35: Biodiversity in the Publication version of the Local Plan also makes reference to Biodiversity Net Gain.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
075	Highways England	<p>The future development opportunities in South Blackpool are detailed in Chapter 8 of the Core Strategy. In particular, it is noted that Blackpool Airport Enterprise Zone (EZ) status was approved in November 2015 and the site became operational in April 2016. It covers 144 hectares of which around 62 hectares lie within Blackpool. The site is stated as benefiting from excellent access to the M55 via Progress Way. In addition, it is noted that access by sustainable modes of transport is a key requirement of Policy CS27 South Blackpool Transport and Connectivity in the Core Strategy.</p> <p>Given the size and proximity of Blackpool Airport EZ to the SRN, it is recommended that Policy DM8 of Local Plan Part 2 includes Highways England in Paragraph 6. The requirement for any improvement related to M55 J4 will need to be agreed in principle with Highways England.</p>	<p>Comments noted.</p> <p>Reference to Highway England has been included in Policy DM8 point 6.</p>
Policy DM9: Blackpool Zoo			
015	Historic England	<p>Blackpool Zoo is adjacent to Stanley Park Conservation Area within which is a registered park and Garden, Stanley Park (Grade II*). The NPPF considers Grade II* heritage assets to be of the highest significance and any harm to or loss of these assets (including setting) should be wholly exceptional. The Council has a statutory duty under</p>	<p>Comment Noted. Specific reference is now made to the Grade 2* Listed Stanley Park linking to Publication Policy DM29: Stanley Park.</p> <p>It should also be noted that policies should not be read in isolation. For such a proposal Publication Policy DM27: Conservation Areas would also apply.</p>

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		<p>the provisions of the 1990 Act to pay special attention to the desirability of preserving or enhancing the character or appearance of its conservation areas. Whilst we welcome reference to the conservation area, the policy needs to be amended to provide further clarification on how these issues will be dealt with. As drafted it lacks any reference to the designated asset and with regards the conservation area incorrectly refers to maintaining and enhancing the visual appeal and character and amenity of the parkland setting of the zoo grounds as well as the adjoining Stanley Park Conservation Area. Therefore, this policy needs to be amended to ensure that it meets the requirements of the NPPF and the 1990 Act.</p>	
Policy DM10: Promenade and Seafront			
015	Historic England	<p>Blackpool Promenade and Seafront contains the town's most important and significant heritage assets and is one of the most recognisable seafronts in the country. The Winter Gardens, the Tower, the three Piers and the early surviving rides of the Pleasure Beach are the defining elements of Blackpool's historic environment. Therefore, in view of this it is expected that any policies for this area should have this at the forefront of the policy. In addition, each of the bullets makes a recommendation which does not include detail or locations; this information currently sits within the</p>	<p>Comments noted.</p> <p>With respect to Point 1, DM10 Promenade and Seafront has been updated to include a bullet e, making reference to conserving, enhancing and securing sustainable futures for the town's heritage assets.</p> <p>DM10 Promenade and Seafront covers the Promenade between the Pleasure Beach and North Pier. Proposals which affect the historic environment, heritage assets and their settings</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>supporting text. The policy would benefit from inclusion of this information to make it place specific to Blackpool.</p> <p>In addition to the above, we have the following comments to make on the drafted policy:</p> <p><u>Point 1:</u> Whilst we welcome proposals which improve the appearance and economic function of this area of the town, development proposals should conserve and enhance the historic environment and secure the sustainable future of its important heritage assets. The historic environment is a critical part of the town's economy and therefore, it should be included here.</p> <p><u>Bullet a:</u> Whilst the intention to improve the built environment is welcomed. This bullet needs to provide further clarity on how this is going to be applied from a development management perspective. Has the council identified which sites on which this will apply? As drafted it could be applied on any site which in turn may affect the historic environment, heritage assets and their setting. Further amendments would ensure that the policy can be applied directly rather than interpreted to suit.</p>	<p>would also have to be assessed against the heritage policies in Part 2 and Policy CS8 in the Core Strategy, which requires development to conserve and enhance heritage assets and relevant paras in NPPF.</p> <p>The Publication Policies Map identifies the area covered by this policy.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p><u>Bullet b</u>: As mentioned the area includes heritage assets as well as conservation areas. Improvements and enhancements to buildings and frontages is a positive proposal within the Plan, but as a general statement in terms of its application within decision making could mean that this may potentially harm the historic environment, so it should be amended to provide further clarity.</p> <p><u>Bullet c</u>: Historic England is concerned that the Plan does not define what is meant by a high quality landmark building, and there is the potential for these to be inappropriately located or designed which may cause harm to the historic environment. The inclusion of this needs further refinement, in particular in setting out appropriate locations and design requirements.</p> <p><u>Bullet d</u>: The intention to encourage high quality public realm, landscaping and green infrastructure is a positive element of the policy.</p> <p><u>Point 2</u>: The Plan should define the location of the application of this policy, which currently sits within the supporting text.</p> <p><u>Point 3</u>: In view of the comments about making the policy place specific. This provides an example of</p>	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>where the policy will be applied. This needs to be expanded to the rest of the policy.</p> <p><u>Point 4:</u> One of the piers is a designated asset the other two are not. In view of this, the policy needs to be amended to ensure that proposals secure the future of these assets through their conservation and enhancement. As drafted, the policy appears to undermine the requirements of the 1990 Act and the NPPF by supporting improvements and development which preserve their character - this relates to conservation areas rather than a heritage asset. Therefore, this should be amended in order to ensure that the policy safeguards their future. The supporting text also needs to be amended accordingly.</p>	
062	Blackpool Pier Company	<p>Avison Young support the broad aims and objectives of Policy DM10, insofar as it seeks to enhance and protect the existing Promenade and Seafront at Blackpool. Avison Young also support the inclusion of the three piers (north, south and central) in the Resort Core as these are major attractions which boost tourism and footfall in the area. We do however have significant concerns about the way in which points three and four of Policy DM 10 are worded. Our concerns are detailed below:</p>	<p>The Council seeks to maintain open aspect views from the Promenade and from approaching streets, on to the sea and beach. The Promenade and beach are key assets in Blackpool and forms the setting for significant heritage assets such as the Tower and the piers.</p> <p>Furthermore, the Promenade and beach provide the bulk of open space for the Inner Area (Open Space Assessment 2018 and Green and Blue Infrastructure Technical Report) and is identified as an integral part</p>

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		<p>North Pier is Grade II Listed and as such Policy DM 10 must be informed by and comply with paragraphs 193-196 of the NPPF (February 2019).</p> <p>Both the Central and South Piers are locally listed (non-designated heritage assets) and as such Policy DM 10 must be informed by para 197 of the NPPF.</p> <p>Point 3 The wording of point 3 lacks description and clarity as it states “<i>land to the west of the tram track</i>” but this a generalised statement and should not be used to characterise the entire area west of the tram track. The areas between the north, central and south piers vary significantly, and areas of Blackpool’s diverse and vibrant seafront contain differing characteristics which must be referenced/explicitly stated within the policy wording. The Council should not take a blanket approach to development along the promenade/seafront as this will ultimately stifle existing business uses also as well as stifling the potential for new development to the west of the tram track; to the detriment of Blackpool’s unique amusement and leisure economy which it is renowned for.</p>	<p>of the town’s green and blue infrastructure, providing important recreation space and flood defence. As a GBI asset, the Promenade should be protected and enhanced to fulfil a greater number of priority needs and GBI functions.</p> <p>The Town Centre Strategy looks to improve links between the Town Centre, the beach and the Promenade and to attract visitors off the Promenade. Providing more development on the west side of the tram tracks would not attract visitors into the Town Centre. It should be left as unobstructed as possible for viewing and recreational walking and cycling.</p> <p>The recent investment in the seafront has created a strong public realm along the Promenade, including the Comedy Carpet and other hard landscaping features and public art, to integrate the beach with the Promenade.</p> <p>There are pockets of poor quality development along the east side of the Promenade which would benefit from investment and re-development rather than building on open space to the west of the tram tracks.</p> <p>Point 3 has been amended to read:</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>Point 4 Point four should be reworded as it is unclear what the Council considers represents “<i>appropriate improvements and development</i>” and is also considered contradictory within itself. In the first sentence it supports “<i>appropriate improvements</i>” and development that will support the future sustainability of the three piers. However, the second sentences appear contradictory to this and states: “Development on the pier heads will not normally be supported”. Avison Young do support the general aim of the policy to ensure that development along the promenade between the three piers west of the tram track protects the wide expansive views toward the shoreline and sea. However, the characteristics and uses of the pier heads and the immediate surrounding land (within their ownership) to which they connect are completely separate to that of the rest of the promenade. It is therefore inappropriate to apply the same strict ‘catch all’ development limitations to these areas closest to the pier as they will limit the piers ability to refurbish and adopt to future changes in market demand. This in itself would be restrictive to the ability to allow the piers to continue to evolve, maintain their economic function and ultimately allow for the continued significant maintenance</p>	<p>Excluding the pier decks and platforms, new development on land to the west of the tram track will not be permitted, other than essential infrastructure, ancillary shelters, seating, public art and further public realm improvements.</p> <p>Point 4 has been amended to read:</p> <p>Appropriate high quality improvements and development on the pier decks and platforms which underpin the sustainable future of the piers and which preserve their character will be supported in principle.</p> <p>With relation to development on the pier heads, point 5 now reads:</p> <p>Appropriate high quality improvements and development at the pier heads will be supported provided the proposals are comprehensive. Piecemeal proposals will not be accepted.</p> <p>The Council do not wish to define appropriate development as this would be too descriptive and may stifle innovation. The decision taker will determine whether a development proposal is appropriate.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>and investment that is required given their age and exposure to the elements.</p> <p>Points 3 and 4 When read together, points 3 and 4 contradict one another. Point three states that development west of the tram track will not be permitted. Whereas point four states that appropriate improvement and development for the three piers will be supported. This appears to be a contradiction and there is a lack of clarity as to what would constitute '<i>appropriate development</i>'. On the one hand the policy would not permit development west of the tram track but on the other it allows for appropriate improvement and development for the three piers, each of which is west of the tram track.</p> <p>Avison Young considers that the policy needs to be reworded in order for it to be clear and unambiguous so that they accord with Para 16 of the NPPF</p> <p><u>Proposed amendments to the wording of Policy DM10</u> Avison Young suggest that the following change to the policy would add greater clarity:</p>	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>“3. New development on land to the west of the tram track, <u>excluding the piers and their immediate setting</u>, will not be permitted other than essential infrastructure and ancillary shelters and seating for people using the Promenade and the beach”</p> <p>This rewording distinguishes the long expanses of shoreline promenade between the three piers from the piers themselves and still aims to retain the openness of the seafront.</p> <p>The Council should define within the policy and supporting text what it considers “<i>appropriate improvements</i>” would be or delete the reference in order to remove ambiguity. Furthermore, the supporting information to the policy paragraph 3.127 of the draft Local Plan states that the Council will support proposals which will “<i>preserve their [the piers] character and ensure their longevity</i>”. This contradicts the policy wording which reads: “<i>Development on the pier heads will not normally be supported</i>”. If policy cannot support development at the pier heads, then this logically leads to the question of how the longevity of the piers and their future can be sustained. Central to the NPPF is the presumption in favour of sustainable development and the need for the planning system to support economic growth.</p>	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>Reference within Policy DM10 must be made to paragraphs 8 and 11.</p> <p>Avison Young also recommend that the last sentence is removed from point 4:</p> <p><i>“4. Appropriate improvements and development which underpin sustainable futures for the three piers and which preserve their character will be supported.”</i></p> <p>In conclusion, Avison Young support the broad aim and objectives of Policy DM10 insofar as it seeks to enhance and protect the existing Promenade and Seafront at Blackpool. We have however identified concerns with the wording of the policy, as currently drafted, which would result in confusion if it were to be applied to any future development proposals. The Council should explicitly state what it considers to be <i>“appropriate improvements”</i> and address the inaccuracies in the policy wording to ensure the longevity of the three piers.</p>	
Policy DM11: Primary Frontages			
No comments received			
Policy DM12: Secondary Frontages			
No comments received			

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
Policy DM13: Amusement Centres, Betting Shops and Pawnbrokers in the Town Centre			
No comments received			
Policy DM14: Residential Use in the Town Centre			
042	Theatres Trust	<p>The Trust is concerned by the inclusion of part 1 of this policy, due to the risk that inappropriate residential development may come forward adjacent to noise-generating cultural venues such as theatres, music venues and pubs.</p> <p>We would suggest that the policy should be removed; this does not mean that residential development could not come forward on upper floors within town centres, but that it would not be explicitly promoted.</p> <p>This would then give the Council greater flexibility when considering such proposals.</p>	<p>National Government is supportive of the concept of town centre living to improve the town centre economy.</p> <p>Paragraph 85 (f) of NPPF 2019 states that planning policies should <i>'recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites'</i>.</p> <p>The policy is therefore reflective of NPPF but specifically states <i>'provided they are in accordance with other policies in the Local Plan'</i> which would include Core Strategy Policy CS7 which ensures <i>'that amenities of nearby residents and potential occupiers are not adversely affected'</i>.</p>
Policy DM15: District and Local Centres			
No comments received			
Policy DM16: Threshold for Impact Assessments – Retail and Leisure Proposals			
045	Valad European Diversified Fund	Draft Policy DM16 sets thresholds for an impact assessment to support proposals for main town centre uses. For sites within 800 metres of a Local	The policy is underpinned by robust up to date evidence in the form of the Blackpool Retail, Hotel and Leisure Study 2018 which was undertaken by specialist retail consultants.

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		<p>Centre (ie Festival Leisure Park), such assessments would be needed for proposals over 200sqm.</p> <p>Festival Leisure Park is within 100m of Central Drive Local Centre, and therefore an impact assessment would be required for all proposals over 200sqm at the leisure park (unless the leisure park is allocated in accordance with our response to Question 1). This would be overly restrictive, particularly compared to the existing threshold of 2,500sqm. The supporting evidence for the policy indicates that the concern appears to be for the impact of retail proposals on existing centres rather than leisure/ restaurant uses. The draft policy is therefore not justified and should be amended, for example to clarify that the thresholds relates to A1 retail uses only and not leisure or restaurant uses (ie retail proposals would still need to be tested).</p>	
048	Melrose Pension Fund	<p>Draft Policy DM16 sets out three local thresholds:</p> <ul style="list-style-type: none"> • There is a universal borough wide threshold of 500 square metres gross floorspace • For applications located within 800m of a district centre, the threshold is 300 square metres gross floorspace 	<p>The policy is underpinned by robust up to date evidence in the form of the Blackpool Retail, Hotel and Leisure Study 2018 which was undertaken by specialist retail consultants.</p> <p>The evidence to support the threshold in relation to Local Centres is set out Section 5 of the Local Centres Assessment.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<ul style="list-style-type: none"> For applications located within 800m of a local centre, the threshold is 200 square metres gross. <p>There is no evidential basis for a threshold of 200 square metres gross for sites within 800m of a local centre. An impact threshold relative to local centres was not addressed by WYG in the Blackpool Study and the proposed threshold does not flow from their assessment and recommendations. The only explanation for a threshold of 200 square metres is in section 5 of the Local Centres Assessment²³. The justification for the Blackpool Local Plan Part 2 Site Allocations and Development Management Policies: Policy DM16 threshold is essentially the same as that put forward by WYG for the district centre threshold of 300 square metres, relying on the same two appeal decisions. The approach is also inconsistent with that taken by neighbouring authorities the implication of which is a tension when proposals are located close to the administrative boundary. Furthermore, an area covered by an 800m radius from all designated local centres comprises practically all the built-up area of the Borough. The local centre threshold of 200 square metres is in effect the default threshold and in the “real-world” operation of the draft policy, the universal</p>	<p>It is not appropriate to directly compare approaches taken by neighbouring authorities in this instance. NPPF at paragraph 9 specifically states that <i>Planning policies should play an active role in guiding development towards sustainable solutions, <u>but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.</u></i> Blackpool Borough includes Blackpool Town Centre which is the sub-regional centre of the Fylde Coast and is significantly more built up than neighbouring Fylde and Wyre. The retail evidence base is therefore reflective of Blackpool’s specific circumstances.</p>

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		<p>threshold of 500 square metres and the district centre threshold of 300 square metres are redundant.</p> <p>The district centre threshold of 300 square metres is designed to capture convenience stores, which it is asserted could have an unacceptable impact on district centres. However, the evidence does not support that proposition. The two appeal decisions on which reliance is placed each have very specific circumstances. Indeed, the Foresters Arms, Luton decision relates to a location within a designated centre and therefore a local impact assessment could not apply in any event. There is no legitimate justification for a local impact threshold of 300 square metres for proposals located within 800m of a district centre.</p> <p>The evidence to support a universal impact threshold of 500 square metres gross is weak. The exercise and research undertaken by WYG in the Blackpool Retail Study is not as thorough as the Peter Brett assessment for Wyre and Fylde. However, at least the proposed threshold of 500 square metres is consistent with the Wyre impact threshold. It is acknowledged that there may be some justification to support a universal local impact threshold of 500 square metres.</p>	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
060	LS Retail	<p>The Local Planning Authority's justification for requiring the submission of an impact assessment for all mains town centre use proposals over the threshold provided in Policy DM16 is derived from the recommendations presented in the Retail, Leisure and Hotel Study, prepared by WYG and dated June 2018 (the 'Retail Study').</p> <p>Clearly, not all proposals have the potential to cause a significant adverse impact upon existing centres. The floorspace threshold for requiring an impact assessment, contained at Paragraph 89 of the NPPF, is 2,500 sq. m.</p> <p>As per Paragraph 016 (Ref: 2b-016-20140306) of the National Planning Practice Guidance ('NPPG') entitled 'Ensuring the Vitality of Town Centres', in setting a locally appropriate threshold for impact, the Local Planning Authority should consider the following:</p> <ol style="list-style-type: none"> 1. Scale of proposals relative to town centres; 2. Existing viability and vitality of town centres; 3. Cumulative effects of recent developments; 4. Whether local town centres are vulnerable; 5. Likely effects of development on any town centre strategy; and 6. Impact on any other planned investment. 	<p>The policy is underpinned by robust up to date evidence in the form of the Blackpool Retail, Hotel and Leisure Study 2018 which was undertaken by specialist retail consultants.</p> <p>It is noted that not all proposals will have the potential to result in an impact on a centre which would be deemed significant adverse. However, the purpose of the policy is to provide the Council with appropriate control over development which could potentially have implications on the overall health of defined centres. Furthermore, it is agreed that the formulation of planning policy must be supported by robust and defensible evidence base.</p> <p>At the outset, it is important to note that the WYG Retail Study provides the authority-wide basis upon which the main town centre use policies have been drafted. It is not unusual for further, more detailed advice and supporting information to be provided during the course of the local plan preparation process or indeed, throughout the course of the Examination. A number of more detailed reports to support local impact threshold policies (and other policies) have been provided on behalf of local authorities and accepted by Inspectors, which provide additional analysis and justification for the recommendations made within the Studies. That</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>It follows that a reduced threshold for assessing impact should only be introduced where the Council has produced evidence to show that proposals for main town centre uses less than 2,500 sq. m in out of centre locations would have the potential to cause a significant adverse impact on a centre or centres in the hierarchy. To avoid the considerations of the NPPG, would result in the advice of national Government on how the policies of the NPPF are to be applied and in this circumstance could lead to a threshold being set that is not 'locally appropriate' as would be required by both NPPF and NPPG.</p> <p>The Retail Study, which is listed as Supporting Evidence for the draft Local Plan, states at Paragraph 10.11.2 that the need to protect Blackpool town centre from trade diversion and further shifts in shopping patterns to out of centre floorspace justifies the adoption of a lower threshold for assessing impact. In relation to Blackpool town centre, Paragraphs 10.11.7 & 10.11.8 of the Retail Study provide the Local Planning Authority's 'evidence' for adopting a lower threshold than the NPPF threshold of 2,500 sq. m. They state:</p>	<p>does not mean however, that the recommendations made within the Study are not already supported by clear justification.</p> <p>In response to comments made:</p> <ol style="list-style-type: none"> 1. The proposed policy on impact thresholds has been drafted having regard to a series of considerations, not just one or two. This accords with paragraph 016 of the NPPG. The impact threshold policy has to take account the composition of existing defined centres, their health, the scale of out of centre developments and so on. The policy also has to be applied having regard to the implication of out of centre development in the past, and how these have impacted on shopping patterns. 2. A 'blanket' threshold has not been applied across all of the Borough regardless of a centre's size. The scaled threshold policy seeks to control development having regard to the scale and nature of the closest centres and the associated implications. It is clear that proposals which seek to provide even 'modest' levels of floorspace in proximity to local or district centres. Applying specific thresholds for each individual centre would not have any wider benefits, and would result in a

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p><i>“We note that there are a relatively limited number of units greater than 500 sq. m in Blackpool town centre (less than 8% of the total stock of commercial units have a greater floorspace than this) and we consider that a unit of such a scale could potentially accommodate an operator of importance to the future vitality and viability of the town centre.</i></p> <p><i>Furthermore, we also note that the threshold applies to individual application proposals and that it could be possible for an applicant to ‘circumnavigate’ the requirements of the test through the submission of multiple, small-scale applications which together would provide for a larger development. As such, we recommend that the impact threshold of relevance to Blackpool town centre is set at 500 sq. m, for applications relating to both convenience and comparison retail floorspace, along with the wider Borough, if the proposal does not fall within the specific additional threshold requirements for district centres...”</i></p> <p>The Retail Study also states at Paragraph 10.11.6 that it would not be appropriate to adopt a ‘blanket threshold’ across the whole of the Borough, but rather it would be preferable to apply a range of threshold in accordance with the type of</p>	<p>policy which is overly confusing and exceptionally difficult to apply in practice. The drafted policy follows similar approaches elsewhere across the country, which have been accepted by Inspectors, and importantly accepted in cases where centres are performing stronger than in Blackpool’s case.</p> <p>3. Savills states that the town centre’s vacancy rate, reduction in comparison goods expenditure market share and potential for out of centre retail destinations to become stronger in the future, are not factors which constitute valid reasons for lowering thresholds. However, these criteria each follow the NPPG guidance at paragraph 016 and are directly related to the requirement to adopt a lower threshold. Indeed, the NPPG states that a key consideration is whether the town centres are vulnerable, the scale of proposals relative to town centres and the cumulative effects of recent developments. Whilst the vacancy rate of a centre is not the only indicator that a centre is struggling, it is one key consideration which has to be taken account of, and an important one. The thresholds have been applied having regard to the overall vitality and viability, which were thoroughly assessed as part of the Retail Study, and will continue to be at regular intervals moving forward.</p>

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		<p>centre the proposed development is proximate to. Those thresholds would apply to new development proposals, change of use and applications to vary conditions on existing permissions.</p> <p>Despite the above, it is clear that Policy DM16 seeks to introduce a threshold for assessing impact of 500 sq. m for all areas which are not in close proximity to a district or local centre. It is therefore the case that the Council is seeking to introduce a blanket threshold which is significantly reduced from that set out in the NPPF.</p> <p>The proposed figure of 500 sq. m is provided without any reference as to how the Council's advisor considers this to be an appropriate threshold for requiring an assessment of the impact of a proposal. There is very little evidence produced in the Retail Study to justify such a reduction. The fact that there are only a limited number of stores in Blackpool town centre which are larger than 500 sq. m is not a robust justification. It is not evidence to demonstrate that a store larger than 500 sq.m could have a significant adverse impact on stores within the town centre, which is the requirement for introducing an impact assessment in policy. There is no evidence to demonstrate that stores above or below 500 sq. m and present in the town centre</p>	<p>4. To suggest that Blackpool is 'over performing' demonstrates a lack of understanding of not only the Retail Study but also the Borough as a whole, along with a lack of knowledge of the current state of the Town Centre substantial investment currently being ploughed into the centre by the Council. Every effort is being made to ensure the future vitality and viability of the centres across the Borough.</p> <p>It is again important to note that applying a lower threshold does not necessarily equate to the refusal of out of centre development. It simply provides the Council with greater control over such development and ensures that schemes which have the potential to have significant adverse impacts on defined centres are appropriately assessed against the relevant tests. Indeed, it is noted that the impact tests will be applied proportionately.</p> <p>To conclude, the thresholds proposed in the draft policy are appropriate and are supported by robust justification.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>are underperforming, or that the range of goods that may be sold from outside town centres would have a significant adverse impact on the operation of existing stores.</p> <p>Paragraph 10.11.9 of the Retail Study states that the recommended threshold is based upon an assessment of the town centre's vacancy rate, its reduction in comparison goods expenditure market share, and the potential for out of centre retail destinations to become even stronger in the future. It should be noted that none of these factors constitutes a valid reason for lowering the threshold for requiring an impact assessment to accompany a planning application for a proposed main town centre use. There is no evidence to link vacancy rates with out of centre stores, and on its own, it is not an indicator of the vitality and viability of a town centre. There is very clear Government advice, as detailed above, which demonstrates the considerations required in order to justify a reduction in the impact assessment threshold. Such an assessment has not been carried out with respect to Blackpool town centre. For example, Table 4.14 of the Retail Study confirms that the total comparison goods turnover of Blackpool town centre is £267.1m. Paragraph 6.6.12 of the Study also confirms that £388.3m of</p>	

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		<p>tourism spending is spent on comparison goods in the Blackpool area. Applying the proportion of spending in the town centre of 30.2% from Table 4.13 (which is conservative given it is likely that the majority of comparison goods tourism spending is spent in the town centre) would mean that an additional £117.3m is spent in the town centre. It follows a total of £384.4m is forecast to be currently spent on comparison goods in Blackpool town centre.</p> <p>Blackpool town centre provides 47,660 sq. m of comparison goods floorspace (or 33,362 sq. m (net). Assuming the average sales density for comparison goods used by WYG for Blackpool (i.e. 5,000 sq. m), results in an anticipated turnover for Blackpool town centre of £166.8m. It follows that Blackpool town centre is substantially trading above its forecast turnover levels. We conservatively estimate that the spending in Blackpool is £384.4m, compared to its expected turnover level of £166.8m. It follows that the town centre is over-trading when compared to expected levels by approximately £217.6m per annum.</p> <p>1 Based on a net sales ratio of 70% for high street retailing.</p>	

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		<p>Such a high level of trading is not a characteristic of an underperforming town centre – conversely the opposite is the case. If there is a higher than national average vacancy rate in Blackpool town centre, this is not as a result of any effects of out of centre retail development, given the high levels of spending within the centre. A higher vacancy rate is clearly the result of other factors, namely national store disposal programmes that may not be specific to Blackpool, a reduced pool of occupiers, wrong sized space for certain occupiers, suppressed investor confidence etc. When a town centre is trading at greater than 200% more than its expected level, there cannot be any evidence to support a case that a reduced impact threshold is justified, based on the evidential requirements that must underpin a development plan.</p> <p>Since 2014 (prior to the adoption of the Core Strategy) there have only been a handful of planning applications for substantial retail development in Blackpool. Only one of these applications proposed over 2,000 sq. m of floorspace, and permitted the redevelopment of Houndshell Shopping Centre, located within the Primary Shopping Area and therefore the preferred location for such development (App Ref: 17/0453). Similarly, the development of Sainsbury’s at Talbot Gateway has taken place during that period, by</p>	

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		<p>virtue of extant planning permission. It is therefore evident that the recent major retail applications in Blackpool have been proposed in the town centre – that has occurred without the need for an impact assessment threshold.</p> <p>It follows that there is no justification for a reduced threshold for comparison goods retailing. The locally appropriate evidence demonstrates that the national 2,500 sq. m threshold would be appropriate based on local circumstances.</p> <p>In terms of convenience goods, there have also been a small number of mid-sized applications² intended to be operated as foodstores by operators such as Aldi at Blackpool Retail Park (App Ref: 14/0608), and Aldi at Oxford Square (App Ref: 14/0103). The application for Aldi at Blackpool Retail Park included an assessment of impact, despite being below the threshold of 2,500 sq. m.</p> <p>That assessment showed an impact upon Blackpool town centre of 0.7% at 2019 based upon a total proposed floorspace of 1,740 sq. m. This assessment illustrates the extent to which the threshold of 500 sq. m is out of proportion with the turnover of existing stores in Blackpool town centre. The Council has confirmed that such proposals for convenience goods floorspace do not draw material levels of trade from Blackpool town centre.</p>	

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		<p>2 Over 1,500 sq. m but less than 2,000 sq. m of proposed floorspace.</p> <p>3 Paragraph 10.11.10 of the Retail Study. This would relate to stores such as Tesco Express and Sainsbury's Local.</p> <p>4 https://en.wikipedia.org/wiki/Tesco</p> <p>5 https://en.wikipedia.org/wiki/Sainsbury%27s</p> <p>Likewise, the reduced thresholds for sites close to district and local centres is based solely on convenience stores operated by the 'main four' food retailers³ (NB – it follows that they do not provide justification for a comparison goods threshold in proximity to those centres and for the reasons outlined above there is no justification for a reduced comparison goods threshold). WYG cite at Paragraph 10.11.10 that there are '<i>...recent appeals where Inspectors have found that such convenience stores can have a significant adverse impact on smaller centres</i>'. Whilst we do not consider that this provides evidence to reduce the impact threshold within locations around district and local centres, it is certainly not evidence to support a blanket requirement for an impact assessment for all foodstores that are proposed and are less than 2,500 sq. m. The suggestion is that it is only convenience stores operated by 'main four' food retailers and not foodstores</p>	

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		<p>operated by retailers that would not fall into that category.</p> <p>The average size of a Tesco Express store is 216 sq. m⁴ and Sainsbury's Local is 220 sq. m⁵. It is that size of stores that the Retail Study contends there may be a concern over. Therefore, it is not appropriate to include the blanket impact assessment threshold set by Policy DM16 for local and district centres. A more appropriate mechanism would be to set a threshold for convenience goods floorspace between a range – e.g. between 200 sq. m – 400 sq. m.</p> <p>Reducing the threshold for requiring an impact assessment does not in itself mean that planning applications for main town centre uses between 500 sq. m and 2,500 sq. m will be refused on grounds of significant adverse impact. It merely introduces a requirement for more applications to be assessed. The purpose of the impact test is to determine whether a proposed development for main town centres use(s) would likely have a significant adverse impact upon the vitality and viability of the town centre as a whole. It is not to prevent any out of centre retail development from occurring.</p>	

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		<p>The purpose of planning to achieve sustainable development as stated in the Ministerial Forward of the NPPF published in 2012 is as follows: <i>'In order to fulfil its purpose of helping achieve sustainable development, planning must not simply be about scrutiny. Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives.'</i></p> <p>Therefore, increasing the requirements for impact assessments, when there is simply no evidence for them – based on the Council's own evidence – provides a level of scrutiny and introduces a bureaucratic time consuming process for all parties involved that is not required or justified. In short, it potentially delays the delivery of sustainable development, when the objectives of the NPPF (Paragraph 11) are that such development should be approved without delay.</p> <p>Importantly, Policy DM16 also introduces a requirement for an impact assessment for leisure developments, when there is no justification or evidence for such a threshold.</p> <p>In the light of the above, we therefore conclude that there is no justification for the thresholds put forward. Based on the Council's own evidence as outlined above, there may only be a requirement</p>	

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		<p>for an impact assessment threshold for convenience stores of a certain size in close proximity to district or local centres. The Council's own Evidence Base could therefore only support the following threshold policy:</p> <p><i>“Policy DM16: Threshold for Impact Assessment</i> <i>1. An Impact Assessment is required for proposals (including the formation of mezzanine floors) which include retail and leisure development which are not located within a defined centre where:</i></p> <p><i>a. the retail or leisure proposal provides a floorspace greater than 2,500 sq. m gross; or</i> <i>b. the proposal is for the erection of a new Class A1 convenience store between 200 – 400 sq. m and is located within 800 metres of the boundary of a District Centre or Local Centre.</i></p> <p><i>2. The scope and content of any Impact assessment shall be agrees with the Local Planning Authority.”</i></p>	
061	Columbia Threadneedle	The Local Planning Authority's justification for requiring the submission of an impact assessment for all mains town centre use proposals over the threshold provided in Policy DM16 is derived from the recommendations presented in the Retail,	The policy is underpinned by robust up to date evidence in the form of the Blackpool Retail, Hotel and Leisure Study 2018 which was undertaken by specialist retail consultants.

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		<p>Leisure and Hotel Study, prepared by WYG and dated June 2018 (the 'Retail Study').</p> <p>Clearly, not all proposals have the potential to cause a significant adverse impact upon existing centres. The floorspace threshold for requiring an impact assessment, contained at Paragraph 89 of the NPPF, is 2,500 sq. m.</p> <p>As per Paragraph 016 (Ref: 2b-016-20140306) of the National Planning Practice Guidance ('NPPG') entitled 'Ensuring the Vitality of Town Centres', in setting a locally appropriate threshold for impact, the Local Planning Authority should consider the following:</p> <ol style="list-style-type: none"> 1. Scale of proposals relative to town centres; 2. Existing viability and vitality of town centres; 3. Cumulative effects of recent developments; 4. Whether local town centres are vulnerable; 5. Likely effects of development on any town centre strategy; and 6. Impact on any other planned investment. <p>It follows that a reduced threshold for assessing impact should only be introduced where the Council has produced evidence to show that proposals for main town centre uses less than 2,500 sq. m in out of centre locations would have the potential to cause a significant adverse impact</p>	<p>It is noted that not all proposals will have the potential to result in an impact on a centre which would be deemed significant adverse. However, the purpose of the policy is to provide the Council with appropriate control over development which could potentially have implications on the overall health of defined centres. Furthermore, it is agreed that the formulation of planning policy must be supported by robust and defensible evidence base.</p> <p>At the outset, it is important to note that the WYG Retail Study provides the authority-wide basis upon which the main town centre use policies have been drafted. It is not unusual for further, more detailed advice and supporting information to be provided during the course of the local plan preparation process or indeed, throughout the course of the Examination. A number of more detailed reports to support local impact threshold policies (and other policies) have been provided on behalf of local authorities and accepted by Inspectors, which provide additional analysis and justification for the recommendations made within the Studies. That does not mean however, that the recommendations made within the Study are not already supported by clear justification.</p> <p>In response to comments made:</p>

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		<p>on a centre or centres in the hierarchy. To avoid the considerations of the NPPG, would result in the advice of national Government on how the policies of the NPPF are to be applied and in this circumstance could lead to a threshold being set that is not 'locally appropriate' as would be required by both NPPF and NPPG.</p> <p>The Retail Study, which is listed as Supporting Evidence for the draft Local Plan, states at Paragraph 10.11.2 that the need to protect Blackpool town centre from trade diversion and further shifts in shopping patterns to out of centre floorspace justifies the adoption of a lower threshold for assessing impact. In relation to Blackpool town centre, Paragraphs 10.11.7 & 10.11.8 of the Retail Study provide the Local Planning Authority's 'evidence' for adopting a lower threshold than the NPPF threshold of 2,500 sq. m. They state:</p> <p><i>"We note that there are a relatively limited number of units greater than 500 sq. m in Blackpool town centre (less than 8% of the total stock of commercial units have a greater floorspace than this) and we consider that a unit of such a scale could potentially accommodate an operator of importance to the future vitality and viability of the town centre.</i></p>	<p>1. The proposed policy on impact thresholds has been drafted having regard to a series of considerations, not just one or two. This accords with paragraph 016 of the NPPG. The impact threshold policy has to take account the composition of existing defined centres, their health, the scale of out of centre developments and so on. The policy also has to be applied having regard to the implication of out of centre development in the past, and how these have impacted on shopping patterns.</p> <p>2. A 'blanket' threshold has not been applied across all of the Borough regardless of a centre's size. The scaled threshold policy seeks to control development having regard to the scale and nature of the closest centres and the associated implications. It is clear that proposals which seek to provide even 'modest' levels of floorspace in proximity to local or district centres. Applying specific thresholds for each individual centre would not have any wider benefits, and would result in a policy which is overly confusing and exceptionally difficult to apply in practice. The drafted policy follows similar approaches elsewhere across the country, which have been accepted by Inspectors,</p>

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		<p><i>Furthermore, we also note that the threshold applies to individual application proposals and that it could be possible for an applicant to ‘circumnavigate’ the requirements of the test through the submission of multiple, small-scale applications which together would provide for a larger development. As such, we recommend that the impact threshold of relevance to Blackpool town centre is set at 500 sq. m, for applications relating to both convenience and comparison retail floorspace, along with the wider Borough, if the proposal does not fall within the specific additional threshold requirements for district centres...”</i></p> <p>The Retail Study also states at Paragraph 10.11.6 that it would not be appropriate to adopt a ‘blanket threshold’ across the whole of the Borough, but rather it would be preferable to apply a range of threshold in accordance with the type of centre the proposed development is proximate to. Those thresholds would apply to new development proposals, change of use and applications to vary conditions on existing permissions. 3</p> <p>Despite the above, it is clear that Policy DM16 seeks to introduce a threshold for assessing impact of 500 sq. m for all areas which are not in close proximity to a district or local centre. It is therefore the case that the Council is seeking to introduce a</p>	<p>and importantly accepted in cases where centres are performing stronger than in Blackpool’s case.</p> <p>3. Savills states that the town centre’s vacancy rate, reduction in comparison goods expenditure market share and potential for out of centre retail destinations to become stronger in the future, are not factors which constitute valid reasons for lowering thresholds. However, these criteria each follow the NPPG guidance at paragraph 016 and are directly related to the requirement to adopt a lower threshold. Indeed, the NPPG states that a key consideration is whether the town centres are vulnerable, the scale of proposals relative to town centres and the cumulative effects of recent developments. Whilst the vacancy rate of a centre is not the only indicator that a centre is struggling, it is one key consideration which has to be taken account of, and an important one. The thresholds have been applied having regard to the overall vitality and viability, which were thoroughly assessed as part of the Retail Study, and will continue to be at regular intervals moving forward.</p> <p>4. To suggest that Blackpool is ‘over performing’ demonstrates a lack of understanding of not only the Retail Study but also the Borough as a</p>

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		<p>blanket threshold which is significantly reduced from that set out in the NPPF.</p> <p>The proposed figure of 500 sq. m is provided without any reference as to how the Council's advisor considers this to be an appropriate threshold for requiring an assessment of the impact of a proposal. There is very little evidence produced in the Retail Study to justify such a reduction. The fact that there are only a limited number of stores in Blackpool town centre which are larger than 500 sq. m is not a robust justification. It is not evidence to demonstrate that a store larger than 500 sq.m could have a significant adverse impact on stores within the town centre, which is the requirement for introducing an impact assessment in policy. There is no evidence to demonstrate that stores above or below 500 sq. m and present in the town centre are underperforming, or that the range of goods that may be sold from outside town centres would have a significant adverse impact on the operation of existing stores.</p> <p>Paragraph 10.11.9 of the Retail Study states that the recommended threshold is based upon an assessment of the town centre's vacancy rate, its reduction in comparison goods expenditure market</p>	<p>whole, along with a lack of knowledge of the current state of the Town Centre substantial investment currently being ploughed into the centre by the Council. Every effort is being made to ensure the future vitality and viability of the centres across the Borough.</p> <p>It is again important to note that applying a lower threshold does not necessarily equate to the refusal of out of centre development. It simply provides the Council with greater control over such development and ensures that schemes which have the potential to have significant adverse impacts on defined centres are appropriately assessed against the relevant tests. Indeed, it is noted that the impact tests will be applied proportionately.</p> <p>To conclude, the thresholds proposed in the draft policy are appropriate and are supported by robust justification.</p>

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		<p>share, and the potential for out of centre retail destinations to become even stronger in the future. It should be noted that none of these factors constitutes a valid reason for lowering the threshold for requiring an impact assessment to accompany a planning application for a proposed main town centre use. There is no evidence to link vacancy rates with out of centre stores, and on its own, it is not an indicator of the vitality and viability of a town centre. There is very clear Government advice, as detailed above, which demonstrates the considerations required in order to justify a reduction in the impact assessment threshold. Such an assessment has not been carried out with respect to Blackpool town centre. For example, Table 4.14 of the Retail Study confirms that the total comparison goods turnover of Blackpool town centre is £267.1m. Paragraph 6.6.12 of the Study also confirms that £388.3m of tourism spending is spent on comparison goods in the Blackpool area. Applying the proportion of spending in the town centre of 30.2% from Table 4.13 (which is conservative given it is likely that the majority of comparison goods tourism spending is spent in the town centre) would mean that an additional £117.3m is spent in the town centre. It follows a total of £384.4m is forecast to be</p>	

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		<p>currently spent on comparison goods in Blackpool town centre.</p> <p>Blackpool town centre provides 47,660 sq. m of comparison goods floorspace (or 33,362 sq. m (net)¹). Assuming the average sales density for comparison goods used by WYG for Blackpool (i.e. 5,000 sq. m), results in an anticipated turnover for Blackpool town centre of £166.8m. It follows that Blackpool town centre is substantially trading above its forecast turnover levels. We conservatively estimate that the spending in Blackpool is £384.4m, compared to its expected turnover level of £166.8m. It follows that the town centre is over-trading when compared to expected levels by approximately £217.6m per annum.</p> <p>1 Based on a net sales ratio of 70% for high street retailing.</p> <p>Such a high level of trading is not a characteristic of an underperforming town centre – conversely the opposite is the case. If there is a higher than national average vacancy rate in Blackpool town centre, this is not as a result of any effects of out of centre retail development, given the high levels of spending within the centre. A higher vacancy rate is clearly the result of other factors, namely national store disposal programmes that may not be specific to Blackpool, a reduced pool of</p>	

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		<p>occupiers, wrong sized space for certain occupiers, suppressed investor confidence etc. When a town centre is trading at greater than 200% more than its expected level, there cannot be any evidence to support a case that a reduced impact threshold is justified, based on the evidential requirements that must underpin a development plan.</p> <p>Since 2014 (prior to the adoption of the Core Strategy) there have only been a handful of planning applications for substantial retail development in Blackpool. Only one of these applications proposed over 2,000 sq. m of floorspace, and permitted the redevelopment of Houndshell Shopping Centre, located within the Primary Shopping Area and therefore the preferred location for such development (App Ref: 17/0453). Similarly, the development of Sainsbury's at Talbot Gateway has taken place during that period, by virtue of extant planning permission. It is therefore evident that the recent major retail applications in Blackpool have been proposed in the town centre – that has occurred without the need for an impact assessment threshold. It follows that there is no justification for a reduced threshold for comparison goods retailing. The locally appropriate evidence demonstrates that the</p>	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>national 2,500 sq. m threshold would be appropriate based on local circumstances.</p> <p>In terms of convenience goods, there have also been a small number of mid-sized applications² intended to be operated as foodstores by operators such as Aldi at Blackpool Retail Park (App Ref: 14/0608), and Aldi at Oxford Square (App Ref: 14/0103). The application for Aldi at Blackpool Retail Park included an assessment of impact, despite being below the threshold of 2,500 sq. m. That assessment showed an impact upon Blackpool town centre of 0.7% at 2019 based upon a total proposed floorspace of 1,740 sq. m. This assessment illustrates the extent to which the threshold of 500 sq. m is out of proportion with the turnover of existing stores in Blackpool town centre. The Council has confirmed that such proposals for convenience goods floorspace do not draw material levels of trade from Blackpool town centre.</p> <p>² Over 1,500 sq. m but less than 2,000 sq. m of proposed floorspace.</p> <p>³ Paragraph 10.11.10 of the Retail Study. This would relate to stores such as Tesco Express and Sainsbury's Local.</p> <p>⁴ https://en.wikipedia.org/wiki/Tesco</p> <p>⁵ https://en.wikipedia.org/wiki/Sainsbury%27s</p>	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>Likewise, the reduced thresholds for sites close to district and local centres is based solely on convenience stores operated by the 'main four' food retailers³ (NB – it follows that they do not provide justification for a comparison goods threshold in proximity to those centres and for the reasons outlined above there is no justification for a reduced comparison goods threshold). WYG cite at Paragraph 10.11.10 that there are '<i>...recent appeals where Inspectors have found that such convenience stores can have a significant adverse impact on smaller centres</i>'. Whilst we do not consider that this provides evidence to reduce the impact threshold within locations around district and local centres, it is certainly not evidence to support a blanket requirement for an impact assessment for all foodstores that are proposed and are less than 2,500 sq. m. The suggestion is that it is only convenience stores operated by 'main four' food retailers and not foodstores operated by retailers that would not fall into that category.</p> <p>The average size of a Tesco Express store is 216 sq. m⁴ and Sainsbury's Local is 220 sq. m⁵. It is that size of stores that the Retail Study contends there may be a concern over. Therefore, it is not appropriate to include the blanket impact</p>	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>assessment threshold set by Policy DM16 for local and district centres. A more appropriate mechanism would be to set a threshold for convenience goods floorspace between a range – e.g. between 200 sq. m – 400 sq. m.</p> <p>Reducing the threshold for requiring an impact assessment does not in itself mean that planning applications for main town centre uses between 500 sq. m and 2,500 sq. m will be refused on grounds of significant adverse impact. It merely introduces a requirement for more applications to be assessed. The purpose of the impact test is to determine whether a proposed development for main town centres use(s) would likely have a significant adverse impact upon the vitality and viability of the town centre as a whole. It is not to prevent any out of centre retail development from occurring.</p> <p>The purpose of planning to achieve sustainable development as stated in the Ministerial Forward of the NPPF published in 2012 is as follows: <i>‘In order to fulfil its purpose of helping achieve sustainable development, planning must not simply be about scrutiny. Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives.’</i></p>	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>Therefore, increasing the requirements for impact assessments, when there is simply no evidence for them – based on the Council’s own evidence – provides a level of scrutiny and introduces a bureaucratic time consuming process for all parties involved that is not required or justified. In short, it potentially delays the delivery of sustainable development, when the objectives of the NPPF (Paragraph 11) are that such development should be approved without delay.</p> <p>Importantly, Policy DM16 also introduces a requirement for an impact assessment for leisure developments, when there is no justification or evidence for such a threshold.</p> <p>In the light of the above, we therefore conclude that there is no justification for the thresholds put forward. Based on the Council’s own evidence as outlined above, there may only be a requirement for an impact assessment threshold for convenience stores of a certain size in close proximity to district or local centres. The Council’s own Evidence Base could therefore only support the following threshold policy:</p> <p><i>“Policy DM16: Threshold for Impact Assessment</i></p>	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p><i>1. An Impact Assessment is required for proposals (including the formation of mezzanine floors) which include retail and leisure development which are not located within a defined centre where:</i></p> <p><i>a. the retail or leisure proposal provides a floorspace greater than 2,500 sq. m gross; or</i></p> <p><i>b. the proposal is for the erection of a new Class A1 convenience store between 200 – 400 sq. m and is located within 800 metres of the boundary of a District Centre or Local Centre.</i></p> <p><i>2. The scope and content of any Impact assessment shall be agrees with the Local Planning Authority.”</i></p> <p>Summary and Conclusion</p> <p>Columbia Threadneedle are a long term stakeholder in Blackpool town centre and the wider Borough as a whole. It is the freehold owner of the retail warehousing development located on Holyoake Avenue, which has been developed with the Council’s support over the past 35 years.</p> <p>The Retail Study, provided by the Council’s retail consultant, WYG, does not provide robust justification for the proposed thresholds for main town centres uses outlined in Policy DM16. The</p>	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		Council's own evidence supports only the revised Policy DM16 as stated above.	
Policy DM17: Hot Food Takeaways			
045	Valad European Diversified Fund	<p>Draft Policy DM17 prevents the development of hot food takeaways (A5 uses) in or within 400 metres of wards where there is more than 15% of the year 6 pupils or 10% of reception pupils classified as very overweight.</p> <p>The policy is overly restrictive and is not positively prepared. It does not account for any circumstances which would render such a proposal acceptable, such as proposals for healthy hot food retailers who operate under the A5 use or for proposals on existing leisure parks. The policy needs to enable existing leisure parks such as Festival Leisure Park to adapt over time and improve its offer. We propose that the policy should not be applicable to existing leisure parks and/or should be caveated to allow for special circumstances to be demonstrated on a case by case basis.</p>	<p>The link between planning and health has been established in the National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG) and incorporated in the Core Strategy. National and local planning guidance acknowledges that planning has an increasingly important role to play in creating healthy environments and reducing health inequalities.</p> <p>A strategic aim of the Council is to tackle unhealthy lifestyles including unhealthy eating and obesity. Obesity and being overweight are major public health problems and obesity levels in Blackpool are generally higher than the national average.</p> <p>The Council acknowledges that hot food takeaways are just one of the contributory factors to obesity levels within the town and the plan contains a range of policies which seek to promote healthy communities. Evidence prepared in support of the Plan shows that Blackpool is already very well served by hot food takeaways and that childhood obesity in many wards in Blackpool is well above the national average.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
			<p>This approach has been found sound by many planning inspectors at both examination and appeal.</p> <p>The Council could not reasonably restrict new hot food takeaways from selling unhealthy food or require that healthy food served.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
060	LS Retail	<p>The explanatory paragraphs to Policy DM17 highlight the social issues associated with the changing nature of food consumption in today's society, and specifically in relation to the increase in childhood obesity. Paragraph 3.177 of the Emerging Plan states that on a national level, childhood obesity has trebled in the past 30 years. In Blackpool, one quarter of reception age children, over a third of Year 6 children and three quarters of adults are either overweight or obese. It is for this reason that the Council is seeking to introduce a policy in the Emerging Plan which prevents the development of new Hot Food Takeaways ('HFTs') in the Borough.</p> <p>Paragraph 3.182 of the Emerging Plan identifies that other local authorities have taken the approach to prevent new HFTs in areas where 10% of reception aged children and 15% of children in Year 6 are classed as being very overweight; or within 400m of a school. Therefore, the Council considers that restricting the development of new HFTs in or within 400m of local wards where there are high levels of childhood obesity is considered to be a robust approach. Policy DM17 links to data produced by Public Health England ('PHE') relating to local health information at local ward level.</p>	<p>The link between planning and health has been established in the National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG) and incorporated in the Core Strategy. National and local planning guidance acknowledges that planning has an increasingly important role to play in creating healthy environments and reducing health inequalities.</p> <p>A strategic aim of the Council is to tackle unhealthy lifestyles including unhealthy eating and obesity. Obesity and being overweight are major public health problems and obesity levels in Blackpool are generally higher than the national average.</p> <p>The Council acknowledges that hot food takeaways are just one of the contributory factors to obesity levels within the town and the plan contains a range of policies which seek to promote healthy communities. Evidence prepared in support of the Plan shows that Blackpool is already very well served by hot food takeaways and that childhood obesity in many wards in Blackpool is well above the national average.</p> <p>This approach has been found sound by many planning inspectors at both examination and appeal.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>Whilst Policy DM17 seeks to prevent the development of HFTs in areas where children are 'very overweight', the classifications given in the PHE data are 'Excess Weight' or 'Obese'. We have assumed therefore that the percentage of children who are 'Obese' is what is targeted by Policy DM17. Blackpool Council consists of 21 local wards. The percentages of obese children in those wards, as per the PHE data, are provided in the table below.</p> <p>We have reviewed the data provided by PHE which shows that any application for the development of a Class A5 HFT in any ward in Blackpool would be refused according to the requirements of Policy DM17. Whilst we appreciate the aims of the draft policy in attempting to prevent further growth in childhood obesity, the current wording of the policy is overly preventative. We do not regard that such a blanket approach is appropriate as the recorded data does not provide an adequately micro-level analysis.</p> <p>As provided in the Emerging Plan, the prevalence of eating out of home is becoming more and more commonplace. The development of HFTs in appropriate locations, such as town centres and</p>	<p>There are no hot food takeaways within 400m of around half of the schools in Blackpool yet obesity levels are still generally higher than the national average.</p> <p>The policy is fluid as the National Child Measurement Programme updates the childhood obesity figures annually and the evidence base will be updated to reflect changing circumstances.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>retail parks, should not be objectionable in principle as they provide a valuable commercial service which is often in high demand. Preventing further development of any HFTs across the Borough would prevent the sustainable development of commercial uses which provide positive economic impacts such as a valuable source of jobs for residents of Blackpool.</p> <p>The policy should be revised in order to more specifically address target areas where children are most likely to congregate at times when they are unsupervised by parents, such as schools, parks and recreation grounds. Whilst the Council asserts at Paragraph 3.183 of the Emerging Plan that there is little evidence that HFTs near schools are an issue in Blackpool, no evidence is provided to support this position.</p>	
Policy DM18: Tall Buildings and Strategic Views			
015	Historic England	<p>The NPPF sets out a number of requirements for local plans in respect of the historic environment. This includes the need for the Plan to demonstrate how it conserves and enhances the historic environment of the area and guide how the presumption in favour of sustainable development should be applied locally. The NPPF makes it clear</p>	<p>The Council adopted a Built Heritage Strategy in 2016 which was informed by the Blackpool Heritage Characterisation Study 2009. The Characterisation Study assesses the architectural and historic character of the buildings of Central Promenade, Layton, Town Centre, South Beach, Raikes, North</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>that new development should be Plan-led with an emphasis on Local Plan policies that provide clear guidance on what will or will not be permitted in order to provide clarity for the determination of development proposals. In view of this we have the following comments to make:</p> <ul style="list-style-type: none"> • There does not appear to be any information/evidence to support the implementation of this policy. • The historic environment should be one of the key drivers of the implementation of this policy but it does not appear to be. • Bullet 1: Where is the townscape analysis to support key locations, predominant heights and important views? At the moment this could be open to individual interpretation. The policy should set out these requirements and have the evidence to support it. • What is the definition of a landmark building? • Bullet 2: How do site character and the character of the surroundings define building heights? Where is the evidence to support the proposed number of stories? • Bullet 3: The policy makes reference to key views but these have not been defined anywhere. Indeed in Bullet 3, it could be argued that the list if 	<p>Shore, North Promenade and Bloomfield. A study was also undertaken for the Marton Moss Area.</p> <p>The Characterisation Studies have informed the local list and resulted in 4 additional conservation areas (Raikes, Foxhall, Marton Moss and North Promenade) and informed policies in the Core Strategy and draft policies in Part 2.</p> <p>Whilst the assessments are 10 years old, the townscape has changed very little.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>mapped out excludes all locations for tall buildings. Is this the intention?</p> <ul style="list-style-type: none"> • Bullet 4: Again the views need to be defined through a townscape analysis 	
Policy DM19: Extensions and Alterations			
015	Historic England	<p>It is not clear whether or not this policy will apply to the historic environment and heritage assets. Given that these are subject to different requirements and that the proposed policy may not be appropriate in applications on for example, listed buildings. Therefore, the Policy should be amended to include a reference to the fact that any applications for extensions and alterations to heritage assets including within conservation areas will be dealt with by the relevant policies within the Plan.</p>	<p>Any applications submitted for extensions and alterations in the historic environment and heritage assets would be assessed against this policy alongside all the other relevant policies in the Local Plan and having regard to the NPPF and NPPG. It is considered unnecessary to reiterate this in every policy.</p>
045	Valad European Diversified Fund	<p>Draft Policy DM19 seemingly only relates to extensions and alterations to houses, but this arguably could be read as being related to commercial development, which should be clarified.</p>	<p>Policy DM20 Extensions and Alterations relates to both residential and commercial property. An additional point has been included to read: <i>Extensions which result in a loss of green infrastructure, car parking or servicing areas will need to be robustly justified and appropriately mitigated.</i></p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
Policy DM20: Landscaping			
045	Valad European Diversified Fund	Draft Policy DM20 seeks to secure additional landscaping or otherwise financial contributions in relation to new development proposals. As currently worded, minor applications (eg works to the existing leisure park) could be caught by this requirement. This policy should include thresholds or clarifications in order to be effective.	<p>Point 1 of the policy wording has been amended to read:</p> <p><i>Development proposals are expected to contribute towards green and blue infrastructure and <u>where appropriate</u>, planning applications should include details of hard and soft landscaping.</i></p>
058	Bourne Leisure	<p>The importance of tree planting is recognised particularly in areas such as Blackpool where tree coverage can be limited. Bourne Leisure’s approach to development usually includes introducing landscape and planting improvements as an integral part of wider environmental improvements. However, it is considered that there is insufficient justification for the emerging policy to seek a net increase in tree planting by default.</p> <p>Planning Policy Guidance [Natural Environment, para 29] sets out that policy relating to green infrastructure requirements should be evidence based. As drafted emerging Policy DM20 fails to take into account the context of the site, its landscape characteristics and the quality of the trees removed or whether such a replacement</p>	<p>On the 27th June 2019, Blackpool Council declared a climate change emergency which requires planning policy and decisions to accelerate the delivery of zero carbon development by 2030.</p> <p>The Green and Blue Infrastructure Action Plan 2019-2029 identifies the need to double the tree canopy cover in Blackpool by 2029. The Local Plan Part 2 has been informed by the Green and Blue Infrastructure Strategy and the Green and Blue Infrastructure Technical Report and an Open Space Assessment.</p> <p>Point 1.7.6 of the Action Plan states: Introduce a Supplementary Planning Document (SPD) policy whereby any trees and hedgerows/shrubs lost through development in the Defined Inner Area must be replaced with an agreed ratio.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>ratio may be unsuitable or unfeasible. It is therefore concluded that this policy is unsound as drafted, as it fails to meet the test requiring the plan to be justified.</p> <p>In order to be considered sound, the policy should be revised to promote tree replacement that is site and project appropriate, taking in to account the site characteristics and the quality and condition of the trees removed.</p>	<p>This policy will be supported by the ‘Greening Blackpool’ SPD which will include further details.</p> <p>Point 2.2 of the Action Plan requires that there is an increase the overall tree canopy in Blackpool to 10%, starting with planting of 10,000 trees in the ten year period 2019 to 2029.</p> <p>The Green and Blue Infrastructure Strategy and the Core Strategy and in particular, Policy CS6 identifies that a lack of green infrastructure, including trees is having a negative impact on mental and physical health in Blackpool, which has the lowest life expectancy in the UK and the lowest tree cover in the UK.</p> <p>Core Strategy Policy CS6 states that “High quality and well connected networks of green infrastructure in Blackpool will be achieved by protecting existing green infrastructure networks and existing areas of green belt. The loss of green infrastructure will only be acceptable in exceptional circumstances where it is allowed for as part of an adopted Development Plan Document or where provision is made for appropriate compensatory measures, mitigation or replacement. Policy 21: Landscaping supports CS6</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
			<p>and provides more clarity as to what the requirements are.</p> <p>It is agreed that not all sites may be suitable for replacement tree planting so for clarity, at the end of part a, the policy has been amended to include:</p> <p><i>'Where replacement trees would be inappropriate on site, a contribution towards the provision of trees off-site will be required.'</i></p>
064	Rowland Homes	<p>Rowland generally supports the need for landscaping to be designed sensitively and effectively as is the general intention of policy DM20.</p> <p>However, Rowland reserves the right to comment in further detail at the relevant time and would not support any policy requirements relating to landscaping that would threaten the viability / deliverability of the site, without appropriate wording to relax certain requirements where they were not appropriate in a particular scheme and/or location, or where they would threaten overall scheme viability and/or deliverability.</p>	Comments noted.

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
Policy DM21: Public Health and Safety			
042	Theatres Trust	We support part 4 of this policy, which reflects paragraph 182 of the NPPF and the importance of considering the 'Agent of Change' principle where development is proposed in proximity to existing noise-generating uses. The policy also provides some mitigation should the Plan carry forward Policy DM14.1 to which we have objected above.	Support noted.
045	Valad European Diversified Fund	Draft Policy DM21 relates to public health and safety and states <i>“all development proposals must consider air quality...”</i> which implies any application (eg minor alterations) would need to address this requirement. It should be amended to state <i>“All development proposals which have the potential to impact upon air quality must be supported by an air quality assessment”</i> ;	Some minor alterations, such as the installation of a flue or a chimney may have an impact on air quality. The policy asks for air quality assessments ‘where appropriate’ and such assessments wouldn’t be appropriate with most minor alterations.
064	Rowland Homes	Rowland generally support policy DM21 however reserve the right to comment in further detail at the relevant time and would not support any policy requirements relating to public health and safety that would threaten the viability / deliverability of the site.	Comments noted.
066	Environment Agency	Paragraph 3.225 – it cannot be assumed that the Environment Agency will be consulted by the LPA	Comments noted. The Policy which has been re-named ‘Controlling Pollution and Contamination’ in

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>on all development proposals where there may be potential impacts on controlled waters from previous land uses.</p> <p>The policy/justification makes no specific reference to the need to prevent pollution of surface and ground water resources. As such, the policy should be amended to include reference to the fact that development will also be expected to not cause any risk of pollution to surface or ground water and that mitigation will be required to prevent any harm where necessary, in accordance with paragraph 170 of the NPPF.</p>	<p>the Publication Version of the Plan now includes reference to the fact that development will also be expected to not cause any risk of pollution to surface or ground water and that mitigation will be required to prevent any harm where necessary</p>
Policy DM22: Shopfronts			
015	Historic England	<p>Applications for new shopfronts and alterations may be subject to listed building consent and therefore, any reference to them should be removed from bullet 3 and 4 of the policy. The inclusion could imply that the other bullets apply to listed buildings when they may not always be appropriate. It is suggested that an additional bullet could be included that states that any proposals affecting a designated heritage asset will require Listed Building Consent and will not be subject to the requirements of this policy.</p>	<p>It is considered that this policy requires high standard of shopfronts in all cases.</p> <p>The development plan should be read as a whole and it is not felt that it is necessary to cross reference every policy with every other relevant policy.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		Reference to the relevant heritage policy should be included.	
017	British Signs and Graphics Association	<p>1 (d) It is agreed that signage should be in proportion to the shopfront. But there is no justification for the requirement that it be 'only at fascia level'. There are many circumstances where signs at other than 'at fascia level' may be wholly acceptable, e.g. hanging signs which are commonly placed above fascia level, menu boxes at restaurants etc. We suggest that 'only at fascia level and' be deleted.</p> <p>Paragraph 3.248 There may well be good reason for blanking some shop windows with vinyl or other advertisements. There may be tills nearby or internal access arrangements. Furthermore, enclosed shop window displays are a very traditional form of display (consider jewellers) which retailers may wish to retain. We suggest that shop window displays are not the Council's business, particularly since there is nothing the Council can do about whatever form of display is selected. Any advertisement in a building is either excepted from control or has deemed consent under the Regulations; and this includes any form of</p>	<p>Blackpool is a unique town and signage clutter is commonplace and harmful to amenity in the streetscene. This policy relates to shopfronts which includes purpose built signage zones. Advertisements are covered by Policy DM24 which addresses the display of advertisements.</p> <p>The policy has been worded to ensure that there are no detrimental impacts to the streetscene.</p> <p>Signs and advertisements are controlled by the Town and Country Planning (Control of Advertisement Regulations) 1992. The regulations permit the display of certain signs but also give powers to the Council to restrict the display of advertisements in the interests of amenity and public safety and to issue discontinuance notices requiring the display of an advertisement which has deemed consent, to cease. Therefore the Council has control over advertisements with deemed consent.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		advertisement fixed directly to the inside of glazing. You might say that you consider it 'good practise'. But in the end, it is the retailer's choice, as it absolutely should be.	
Policy DM23: Security Shutters			
015	Historic England	Applications for external shutters on listed buildings will be subject to listed building consent which should be clearly stated within this policy and it should also be cross referenced with the relevant Local Plan policy for listed buildings.	The plan should be read as a whole and it shouldn't be necessary to cross reference every relevant policy. Furthermore, the policy states that external shutters will not be permitted on listed buildings which should be sufficient to refuse inappropriate development on a listed building. The policy does not set out where listed building consent is required as this is set out in the relevant legislation.
Policy DM24: Advertisements			
015	Historic England	Applications for advertisements on listed buildings will be subject to listed building consent. This policy does not make clear this requirement. It also appears to suggest that only internally illuminated box signs and digital signage would not be approved for listed buildings but projecting and hanging signs might be okay. Therefore it should be amended to provide clarity about the process for such applications. Reference to the relevant heritage policy should be included.	The policy does not set out where advertisement consent or listed building consent is required as this is set out in the relevant legislation. Proposals for advertisements on or affecting the setting of heritage assets will be assessed against the Advertisements policy along with all the relevant heritage policies in the Core Strategy and Part 2 and the NPPF.

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
			The plan should be read as a whole and it shouldn't be necessary to cross reference every relevant policy.
017	British Signs and Graphics Association	<p>Policy DM24 (2) — this is unduly restrictive. The Regulations require that all advertisement proposals must be considered on individual merit with regard only to amenity and public safety. It is not open to a local authority to restrict the display of a certain general type of advertisement through policy. Further, there is absolutely no justification for such a blanket ban. Modern internally illuminated signs are commonly in slimline boxes (they do not need the depth of older boxes because modern LEDs do not produce the heat which neon strips do). Their face panels may be fret-cut or overlaid so that visible illumination is limited to lettering/logos only; they may be of the “halo” illumination type; and they may be wholly appropriate when seen in conjunction with modern-design shopfronts. We cannot see any justification whatsoever for their total exclusion from principal and secondary shopping areas and the Promenade. These are just the type of areas where such signs would be wholly appropriate and acceptable. We suggest that Policy DM24(2) be deleted and replaced with:</p>	Comments Noted. Policy DM24 Advertisements has been re-drafted so it is more flexible and less prescriptive.

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p><i>“2. Older-type, bulky internally illuminated box signs, often crudely bolted-on to existing fascias, will not be permitted. More modern types of internally illuminated box signs must be used with discretion, particularly on listed or locally listed buildings and in conservation areas.”</i></p> <p>Policy DM24(4) - as explained above, the Council cannot control this type of display. All advertisements inside buildings are either excepted from control or may be displayed with deemed consent. So the Council cannot normally permit or not permit this simply because no permission is required! This paragraph should be deleted.</p> <p>Policy DM24(5) - we do not understand why “digital” signage should be picked out for particular consideration. The Regulations and Government policy and practice advice do not differentiate between digital and other forms of advertising. It is still the case that each proposal must be considered on individual merit. This proposed policy is again unduly restrictive and almost Luddite. Digital advertising is the future (as far as we can see today). It uses less energy, produces</p>	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>fewer waste products, is versatile, requires less servicing (ie fewer vehicle miles) and is an attractive product. We can see no justification whatsoever for the proposed restrictions on this modern form of advertising. We suggest that this paragraph should be entirely deleted.</p> <p>Paragraph 3.267 first bullet point — as explained above, internally illuminated box signs are not necessarily “poor design”. We suggest that “crudely attached, bulky” be inserted between “such as” and “internally illuminated”</p> <p>Paragraph 3.267 bullet point 4 — there is no reason why a “high level” advertisement should be judged for acceptability upon whether it relates to the part of the building on which it is displayed. This is not a relevant consideration. The impact of such a sign on amenity and public safety are the only relevant considerations. “unrelated to the use of that floor of the building” should be deleted.</p> <p>Paragraph 3.267 bullet point 7 — again as explained above, views into the building are not a decisive consideration (although they may be a factor if a building is specifically designed for the interior to be seen from the outside — though this</p>	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		is rare). And there may be other very good reasons why the view to the interior is required to be obscured. Since the Council cannot control this matter anyway, this bullet point should be deleted.	
045	Valad European Diversified Fund	<p>Draft Policy DM24 relates to advertisements and is overly prescriptive (eg restricting units from having more than one projecting or hanging sign), which is not consistent with the NPPG and PPG.</p> <p>Applications should be considered on a case by case basis eg a large unit with multiple elevations may justify more than one projecting sign. The overly prescriptive criteria should therefore be deleted.</p>	Comments Noted. Policy DM25 Advertisements has been re-drafted so it is more flexible and less prescriptive.
Policy DM25: Public Art			
064	Rowland Homes	Policy DM25 relates to Public Art and states that new developments will be required to support the cultural well-being of Blackpool and contribute to addressing positive social, economic and environmental outcomes through the provision of public art projects.	<p>Comments noted.</p> <p>The NPPF recognises that supporting the cultural wellbeing of places is part of the social role of the planning system and its aim of achieving sustainable development¹ and that policies and decisions should ‘take into account and support the delivery of local</p>

¹ NPPF Paragraph 8 (July 2019)

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>The policy goes on to state that public art projects will be delivered where appropriate, through the funding, management, development, implementation and maintenance of such projects by developers related to major development sites including major development sites within the Strategic Locations of Development identified under Policy CS1 of the Core Strategy and major development sites within the South Blackpool Growth Areas.</p> <p>The site is located within the South Blackpool Employment Growth Area, as defined in Figure 10 (Key Diagram) of the Core Strategy. It is therefore assumed that this public art policy would apply to the site. However, Rowland reserves the right to comment further at the relevant time when further details are available and would not support any policy requirements relating to Public Art that would threaten the viability / deliverability of the site.</p>	<p>strategies to improve health, social and cultural wellbeing for all sections of the community'². NPPG advises that 'Public art and sculpture can play an important role in making interesting and exciting places that people can enjoy using'.</p> <p>Additional guidance for developers will be provided through the preparation of an SPD by the Council to assist the implementation of this policy and highlight the range of opportunities that exist for developers to contribute to this agenda without compromising the viability of site development.</p>
065	McCarthy and Stone	This policy is unclear, as the definition of "major development sites" is not stated within the policy. Clarity on this matter would be useful and the	The current definition of major development is set out in The Town and Country Planning

² NPPF paragraph 93 (July 2019)

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		impact of this contribution on the viability of developments should also be carefully considered.	(Development Management Procedure) (England) Order 2015. Additional guidance for developers will be provided through the preparation of an SPD by the Council to assist the implementation of this policy and highlight the range of opportunities that exist for developers to contribute to this agenda without compromising the viability of site development.
Policy DM26: Listed Buildings			
015	Historic England	The NPPF requires that proposals that affect a designated heritage asset should have regard to its significance through its conservation and enhancement and it should avoid harm unless substantial public benefits can be demonstrated. In view of this we have the following comments to make: Bullet 1 • The wording to support appropriate development infers that this policy only can be applied for development. Not all applications for LBC are deemed as development and may be considered repair or reinstatement as well as replacement. In view of this the policy should be amended to refer to proposals.	Comments Noted. Significant changes have been made to the content of this policy working closely with Historic England in order to respond to all the comments made.

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<ul style="list-style-type: none"> • The use of “seek” within the policy does not provide appropriate protection for listed buildings indeed it is considered that this can weaken the protection, as it can be seen as an intention rather than a requirement. The intention should be for proposals that sustain and enhance the significance of listed buildings to be supported. • Reference should be made to setting within this bullet. • A listed building’s special architectural and historic interest is deemed to be its significance. As drafted it infers that significance and architectural and historic interest are two separate matters and they are not. • If this part of the policy is to use the 1990 Act definition then the policy will need to include reference to setting to ensure that it is in keeping with the requirements of the NPPF. Bullet 2 • Under the NPPF, when considering the impact of proposals, great weight should be given to the conservation of the significance of the asset including its setting. Line 1 of the policy however, 	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>appears to protect the listed building and its setting. How will this be implemented?</p> <ul style="list-style-type: none"> • As previously mentioned, proposals that may affect a listed building are not just redevelopment of the asset or within the curtilage. Proposals can range from replacement windows to reinstatement of significance to development some distance away. Therefore this should be amended to ensure clarity and consistency. The setting of a heritage asset is not just within the curtilage and vicinity and can be much wider than this – e.g. Blackpool tower. Yet this policy would not provide a framework to manage such proposals. • This bullet appears to provide some repetition and could be shorted to provide clarity. • What is historic fabric and is this something different to an assets architectural and historic interest. This should be amended to provide clarity and consistency within the Plan. • <i>Retain in situ</i> and <i>repaired</i> appears to be confusing. Development proposals should look to sustaining and enhancing the significance of the 	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>asset, the removal or harm should be avoided, which is more than retention in situ and repairing.</p> <ul style="list-style-type: none"> Proposals are expected to not harm an asset rather than adversely affect. <ul style="list-style-type: none"> Again, there is no need to determine what elements of a proposal can harm the asset, as this could result in applications that do not fit in the list. Again there is the use of proximity, not all assets can be harmed by a proposal that is in proximity to it. <p>Bullet 3</p> <ul style="list-style-type: none"> Character refers to conservation areas and not listed buildings. This policy covers some of the elements of the previous bullets. How would the change of use of a listed building affect its setting? <p>Bullet 4</p> <p>The policy only refers to substantial harm – how does it intend to deal with proposals that cause less than substantial harm?</p> <p>Para 3.295</p>	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		The reference to Stanley Park should be mentioned in the policy DM9: Blackpool Zoo.	
Policy DM27: Conservation Areas			
015	Historic England	<p>Bullet 1: Conservation areas are defined for their special architectural and historic interest, the policy makes reference to special interest only and therefore should be amended.</p> <ul style="list-style-type: none"> • Bullet 2 9(a): is this not repetition of Bullet 1? Also, in view of previous comments how is historic fabric defined? • Bullet 2(b): This bullet contains some relevant information but it contains a long list which is lost in terms of being a useful tool for planning applications. Could this be in a bulleted list? • The policy again uses different terminology, in addition to requiring proposals to respect existing local context and established character, is this different to setting and the character and appearance of the conservation area. • Bullet 2 (c): local character and distinctiveness is separate to conservation areas and is more to do 	Comments Noted. Significant changes have been made to the content of this policy working closely with Historic England in order to respond to all the comments made.

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>with guiding new development. Could this sit within a design policy?</p> <ul style="list-style-type: none"> • Bullet 3: whilst this is welcomed how will it be enforced? Maybe the policy could be more positive and help guide development: Proposals which retain, reinstate and enhance traditional shopfronts will be supported. Reference could be made to the Plan’s shopfront policy. • Bullet 4: This part of the policy would benefit from referring to conservation area appraisals as this process would identify elements which make a positive contribution to the significance of the area. In addition, this section could include reference to the presumption in favour of the retention of buildings and/or features which make a special contribution to the special character and appearance of the conservation. It is important to make reference to features as this play an important part of the conservation area and the policy should ensure that this is covered. In addition there does not appear to be any mention of the Council’s position for proposals that would result in harm to public or open spaces that contribute to the conservation area. Overall this 	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>part of the policy could be simplified as it contains a lot of repetition.</p> <ul style="list-style-type: none"> • In addition, there is a lack of reference to setting in the policy would benefit from its inclusion. • The policy would benefit from what is required when submitting a planning application. 	
Policy DM28: Locally Listed Buildings and other Non-Designated Heritage Assets			
015	Historic England	<p>Historic England welcomes the inclusion of a policy on locally listed heritage assets. We have the following comments to make:</p> <ul style="list-style-type: none"> • The title of the policy is confusing; it would be simpler for it to be called non-designated heritage assets. • Bullet 1: The starting point of the policy should outline the Council's position on proposals which may affect a non-designated heritage asset. If the intention is for the presumption in favour of their retention then this should be the first bullet: <i>Development which would retain, reuse and repair the significance of Blackpool's non-designated heritage assets will be supported.</i> 	<p>Comments Noted. Significant changes have been made to the content of this policy in response to all the comments made and is now Publication Policy DM29: Non-Designated Heritage Assets.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<ul style="list-style-type: none"> • The second half of the policy and Bullet 2 contains a lot of repetition and the use of different terms which appears confusing and could be simplified. • Bullet 3: Again this is repetition. Where a building can demonstrate the Council's exceptional circumstances for demolition, then the policy should set out requirements which would ensure that the new scheme would be of equal or of higher quality, allowing for recording and surveying and also encourage opportunities for salvage and reuse of materials • The policy would benefit from inclusion of guidance on what is expected to be included within a planning application affecting such assets. 	
Policy DM29: Archaeology			
015	Historic England	Historic England is concerned that this policy does not provide any framework to assess planning applications which may harm archaeology including sites which may be worthy of scheduling or contain assets which are of national significance. All the policy does is state that reference will be made to a Lancashire map and then a level of investigation will be required. This does not provide any clarity on the Council's position on	Comments noted. The policy has been significantly amended working closely with Historic England in response to the concerns raised.

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		dealing with planning applications which affect such sites.	
Policy DM30: Wind Energy			
015	Historic England	<p>Whilst we welcome reference to the need for proposals to assess the impact on heritage assets, we are concerned that should any harm be identified then mitigation measures will be secured through planning conditions/obligations. Through the identification of strategic views as mentioned in Bullet 1(d) of this policy and in our response to Policy DM18, there will be an expectation that the siting of any wind turbines will be inappropriate in certain locations because of identified views. This cannot be mitigated, as suggested within the policy. Therefore, the policy needs to ensure that these proposals where they harm the historic environment will not be permitted. It is already suggested within the supporting text.</p>	<p>It is considered that the issues raised under this representation are covered by adopted Core Strategy Policy CS8: Heritage and Publication policy DM 19: Strategic Views</p> <p>Policy CS8 point 3 states that: <i>‘Developers must demonstrate how any development affecting a heritage assets (including conservation areas) will conserve and enhance the asset, its significance and its setting.’</i></p> <p>Publication Policy DM19: under point 2 (as amended) states <i>‘Development that has a detrimental impact on these strategic views will not be permitted.’</i></p> <p>The policies in the Local Plan which includes the Core Strategy Part 1 and Site Allocations and Development Management Policies Part 2 need to be read as a whole, this avoids repetition and over lengthy policy.</p> <p>To provide further clarification a cross reference to other development management policies has been</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
			highlighted in paragraph the supporting text to the policy including strategic views.
058	Bourne Leisure	<p>Bourne Leisure recognises the importance of introducing a variety of forms of renewable energy into the area. However, the wording of the policy should be revised to explicitly protect the amenity of visitor accommodation from wind turbine development. Adverse impacts upon the amenity of visitors will detrimentally affect the ability of tourism accommodation providers to continue to attract new and repeat visitors to the local area, which will have a knock-on consequence for the local economy. The draft policy recognises the need to protect residential amenity but fails to protect visitor amenity.</p> <p>The emerging policy should therefore specifically include visitor accommodation amenity alongside residential amenity. As set out in paragraph 127 of the NPPF, ensuring that development secures a high standard of amenity is an important consideration when determining renewable energy applications. It is therefore concluded that this policy is unsound as drafted.</p>	<p>Comment noted and suggested amendment to DM30 incorporated. The policy has been amended to read:</p> <p><i>“b. there is no unacceptable impact on residential and visitor accommodation amenity and other sensitive users in terms of noise, shadow flicker, vibration and visual dominance(...)”</i></p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>Therefore, in order for the emerging policy to be considered justified and consistent with national policy, the wording of the emerging policy should be revised to:</p> <p><i>“b. there is no unacceptable impact on residential amenity, visitors staying in tourist accommodation and other sensitive users in terms of noise, shadow flicker, vibration and visual dominance(...)”</i></p>	
059	Glasdon Group	<p>Glasdon UK Ltd are fully supportive of renewable energy schemes within the Borough (in particular wind energy), as well as the Local Authority's inclusion of a specific policy to support wind turbine development within the Local Plan Part 2 document.</p> <p>In respect of the wording of Policy DM30, it states that 'the whole Borough is designated as an area of search suitable for small scale wind turbine development'.</p> <p>We would suggest that consideration is given to extending the policy to cover medium-sized and also potentially large-scale installations and not to put physical size or output constraints within the Local Plan, on the basis that, ultimately, site-</p>	<p>Due to the highly urban nature of Blackpool, the existence of Blackpool Airport; the tramway along the length of the promenade; strategically important views of Blackpool Tower; the seafront and coastline; and the need to ensure fall over and safe separation distances, this prohibits the opportunity to locate medium and large scale wind turbine structures within the Borough.</p> <p>As small wind turbines in the past have been approved and NPPF encourages Local Planning Authorities to recognise that even small scale projects provide a valuable contribution to cutting greenhouse gas emission the Council considers that it is not unreasonable to include a positive criteria based policy for small scale wind turbines of a size</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		specific constraints and opportunities, such as those listed within points a-f of the policy, will determine the appropriate scale of an installation in a given location.	up to 20m in height from ground level to tip of blade.
Policy DM31: The Coast and Foreshore			
No comments received			
Policy DM32: Development in the Countryside			
No comments received			
Policy DM33: Biodiversity			
021	Lancashire Wildlife Trust	Wildlife Sites haven't been identified in plan form. They should be shown on the Proposals Map so potential developers will be aware of their existence.	The sites with biodiversity value are identified on the Policies Map that accompanies the Publication Version of the Plan.
066	Environment Agency	<p>This policy should expand on Policy CS6 of the adopted Local Plan Part 1 (Core Strategy) to ensure compliance with the requirements of the NPPF section 15. We would suggest the policy includes a requirement that developers will be expected to demonstrate how their scheme provides net gains for biodiversity where appropriate.</p> <p>The policy/justification should also identify the links between green infrastructure (GI) provision and wider biodiversity net gain requirements of the Government's 25 Year Environment Plan. Reference should be made to the links between</p>	<p>Comments noted. Publication Policy DM35: Biodiversity has been amended and includes reference to the mitigation hierarchy and biodiversity net gain. Point 1 of the policy now reads:</p> <p>1. Development proposals will be required to:</p> <p>a. result in no loss or harm to biodiversity through avoidance, adequate mitigation or, as a last resort, compensatory measures secured</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>improved/enhance GI resources and the delivery of biodiversity net gains, where such opportunities exist.</p> <p>Otherwise, there is a risk that opportunities to protect and enhance GI resources do not give sufficient weight to the potential biodiversity gains associated with the proposals.</p> <p>The LPA should also consider biodiversity accounting and habitat evaluation procedures to deliver biodiversity net gains through the planning process.</p>	<p><i>through the establishment of a legally binding agreement;</i></p> <p><i>b. minimise the impact on biodiversity and provide net biodiversity gains through good design by incorporating biodiversity enhancements and habitat creation where opportunities exist.</i></p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
Policy DM34: Allotments and Community Gardens			
No comments received			
Policy DM35: Open Land Meeting Community and Recreational Needs			
No comments received			
Policy DM36: Community Facilities			
014	Historic England	The opening text to bullet 4 states that the loss of a public house through demolition or change of use will only be supported where (g) the proposal will not result in the loss of a heritage asset or harm to the setting of a heritage asset. Any proposals that affect a heritage asset will be expected to sustain and enhance the significance of the asset in line with the requirement so of the NPPF. Any harm should be avoided unless it can meet the stated tests. This policy only refers to the loss of the asset or harm to the setting only and therefore, weakens the protection given to designated assets. Therefore this should be amended.	Comments noted. Any proposals affecting heritage assets will be appropriately assessed using the Heritage DM policies and Core Strategy policy CS7: Heritage. Bullet 4 (g) has therefore been removed.
024	Department for Education	We support the protection afforded to community facilities through the proposed policy DM36: Community Facilities, which seeks to ensure that	Support noted.

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		local areas can provide good community facilities, including educational facilities.	
042	Theatres Trust	We support this policy which should provide protection for Blackpool's valued community, cultural and social facilities. We also welcome specific guidance applied to proposals for pubs.	Support noted.
045	Valad European Diversified Fund	<p>Draft Policy DM36 relates to community facilities and proposes certain criteria to be applied to proposals resulting in the loss of public houses.</p> <p>It is not clear whether all these criteria need to be met for such a proposal to be deemed acceptable, but we consider such a requirement would be overly restrictive. For example, if the existing use has been proved to be unviable, it would be unreasonable to refuse an application if it would result in a shortfall of local public house provision in the area (ie the unit may have to remain as a vacant pub in perpetuity).</p> <p>The policy is inconsistent with the NPPF which states at paragraph 92 that planning policies should <i>"guard against the unnecessary loss of valued facilities and services, particularly where</i></p>	<p>It is not considered appropriate to amend this policy. If viability is an issue, this should be robustly demonstrated in accordance with the policy requirements.</p> <p>Part 4 of the policy has been re-ordered so that point d is at the end of the policy and the word 'OR' has been inserted so that if there are overriding public benefits to a development, these can be considered separately to viability.</p> <p>A bingo hall is a community facility but has a limited draw compared to a public house. Furthermore, a public house tends to be used by a local community and a bingo hall, especially of the size proposed for Festival Park, is more of a borough wide facility and not a local community facility. The Inspector who determined the appeal for a Bingo Hall at Festival</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p><i>this would reduce the community’s ability to meet its day-to-day needs” (<u>Indigo emphasis</u>).</i></p> <p>The policy needs to be flexible or it would lead to vacancy and dereliction e.g. the Swift Hound public house at Festival Leisure Park which is no longer viable.</p> <p>We consider the policy should state (additions in red):</p> <p><i>“Proposals that would lead to the loss of a public house through demolition or change of use will only be supported where special circumstances have been demonstrated which may include all or some of the below...”</i></p> <p>In terms of the subsequent criteria, ‘c’ should state that no viable alternative community use has been identified. Criterion ‘e’ should be deleted as this is subjective and means that if one person noted the facility is of cultural importance to them, it would prevent such a proposal from being accepted.</p> <p>We consider it should also be recognised that a bingo hall is a community facility. The proposed bingo hall at Festival Leisure Park is effectively</p>	<p>Park agreed that a Bingo Hall isn’t a community facility.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		modernising the current community facility in this location (the Swift Hound public house), providing a destination where local people can meet and socialise.	
Policy DM37: Blackpool Victoria Hospital			
No comments received			
Policy DM38: Blackpool and the Fylde College – Bispham Campus			
No comments received			
Policy DM39: Transport Requirements for New Development			
004	Trams to Lytham	Support all statements, particularly which appropriate provision is made for public transport within new developments. Please refer to previous comments for specific examples.	Comments noted.
020	Home Builders Federation	<p>This policy requires proposals to provide electric vehicle charging points, Appendix C1 sets this at one charging point per house within a garage or on the driveway, with other development including flats at 10% of parking bays.</p> <p>Whilst the HBF do not oppose the provision of electric charging points, the policy as worded is currently considered to be overly onerous. An element of flexibility would be beneficial and is considered to be compliant with the NPPF, paragraph 105.</p>	In accordance with the NPPF, in setting local parking standards, there is a “need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles”. The requirement of 10% of parking bays, as stated in Appendix C1 of the Informal Consultation Draft, is not considered to be too onerous. The Government’s Road to Zero Strategy (9 th July 2018) sets out ambition for at least 50% — and as many as 70% — of new car sales to be ultra low emission by 2030, alongside up to 40% of new vans. NPPF states: “...applications for development should: e) be designed to enable charging of plug-in and other ultra-low emission

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>The HBF would also encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible optimised energy system that can cope with the potential for a mix of electrical heating systems and electric vehicle systems.</p> <p>The HBF would also encourage the Council to consider the viability of the provision of electric vehicle charging points particularly if higher standards of charging points are required. This will also apply to policy DM5.</p>	<p>vehicles in safe, accessible and convenient locations.” With regard to one charging point per house, the emphasis has been changed so that there will be a requirement to provide the appropriate electric vehicle charging infrastructure, which would facilitate the addition of the most appropriate charging point by the homeowner.</p> <p>In addition, the 2020 Local Plan Viability Study did not raise any viability issues regarding this policy requirement.</p>
018	Network Rail	<p><i>c. appropriate provision is made for public transport;</i></p> <p>The railway stations within the area – Blackpool North, Blackpool South, Squires Gate, Lytham appear to be between 400m and 2km and over from the proposed allocation sites.</p> <p>Transport Assessments (TA) should still consider the potential for increased footfall from developments to impact stations, as well as vehicle parking / cycle storage at stations. Any enhancements required by increased footfall to be fully funded by developers.</p>	<p>Comment noted. Any increase in station footfall as a consequence of development, although difficult to quantify, and impacts on level crossings (if relevant) would be identified in respective Transport Assessments, which would be thoroughly appraised by the Local Highway Authority. Increased footfall would result in increased revenue for the train operator, however noting that parking at stations is the responsibility of Network Rail / Northern Railway.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>(3) The council is advised that Carleton Level Crossing (our ref: PBN 15.0948) is just over the boundary in Wyre council's area (going East from Blackpool North). There are also further level crossings in the adjacent council area of Fylde and Wyre.</p> <p>Councils are advised that level crossings can be impacted in a variety of ways by development proposals:</p> <ul style="list-style-type: none"> • By a proposal being directly next to a level crossing • By the cumulative effect of developments added over time • By the type of level crossing involved e.g. where pedestrians only are allowed to use the level crossing, but a proposal involves allowing cyclists to use the route • By the construction of large developments (commercial and residential) where road access to and from the site includes a level crossing or the usage of a level crossing increases as a result of diverted traffic or of a new highway • By developments that might impede pedestrians' ability to hear approaching trains 	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>at a level crossing, e.g. new airports or new runways / highways / roads</p> <ul style="list-style-type: none"> • By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs • By any developments for schools, colleges or nurseries where minors in numbers may be using the level crossing • By proposals that change the demographic of users – from say occasional agricultural usage to increased usage by minors, dog walkers, the elderly, cyclists and mountain bikers, pedestrian using smart-phones, with ear-phones – also known as 'vulnerable users' (definition of 'vulnerable users' below). <p>With an increase in the number of dwellings within the Local Plan area, TAs should include assessment of level crossings. Mitigation measures to be funded by developer(s).</p>	
045	Valad European Diversified Fund	Draft Policy DM39 sets out transport requirements for new development and refers to the parking standards at Appendix C1. The parking standards differ significantly from the existing standards and require additional car parking spaces to support development.	<p>Comments noted.</p> <p>Generally, the proposed Parking Standards are not too dissimilar from the existing. In respect of bingo halls, the proposed parking standard is largely consistent with those of other local planning</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>For example, the proposed bingo hall at Festival Leisure Park is 2,327sqm and would have 1,500 seats. Under the existing Policy AS1 of the Blackpool Local Plan (2006), this would require 62 – 81 spaces, whereas under the draft emerging policy, this requirement would more than double to 188 spaces. Similarly, for the whole leisure park as proposed (with the proposed bingo hall and drive through unit in situ), the parking requirement would increase from 439 – 542 spaces to 676 spaces.</p> <p>We object to this change in the standards which is not justified, nor effective or consistent with national policy which seeks to promote sustainable travel modes.</p> <p>In any event, the policy should be caveated to state that departures from the parking standards may be justified, for example where works relates to an existing leisure park, additional new parking provision may not be required.</p>	<p>authorities. In more accessible locations it is likely that less parking provision will be sought. The proposed standards are flexible and will take account of all pertinent factors.</p>
058	Bourne Leisure	<p>The wording of point F of draft policy DM39 does not meet the tests of soundness set out in paragraph 35 of the NPPF. As drafted, the wording</p>	<p>Comments noted. In respect of ‘in future years’ it is considered that this wording could be construed as misleading so these three words have been</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>is both onerous and vague. The current wording would require development which has any impact at all on highways to provide mitigation.</p> <p>Furthermore, it extends this requirement to cover any impact “in future years”. This would therefore result in developments investing in mitigation schemes that may not be required, necessary or appropriate to the context.</p> <p>The importance of maintaining the safety and convenience of highways is recognised but in order for the emerging plan to be consistent with paragraph 108 of the NPPF the requirement to mitigate should also be applied. Overall, it is considered that the draft policy is unsound, as it fails to meet the test requiring the plan to be justified and consistent with national policy.</p> <p>In order to be considered sound, the wording of point F of the policy should be revised to:</p> <p><i>“Additional mitigation measures may be necessary where traffic generated will have a significantly harmful impact on the surrounding network.”</i></p>	<p>removed. However, for the sake of clarity, it considered that the policy is compliant with the NPPF and therefore sound.</p>
064	Rowland Homes	Policy DM39 sets out highway and transport requirements in relation to new site proposals.	Comment noted; slight amendments have been made to reflect this point.

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>Rowland supports the proposed flexible approach, depending on location, to car parking standards set out at Appendix C1. This flexibility should be applied in particular where sites are located sustainably and reliance on cars is reduced. Rowland however reserves the right to comment in further detail at the relevant time.</p> <p>Rowland generally support the proposed standards for EV parking / provision set out at Appendix C1, however would not support any onerous policy requirements relating to EV that would threaten the viability /deliverability of the site or any other sites in the Borough. Any future proofing requirement could threaten viability and must be backed up to date, clear and robust evidence if it is to be included. In any case, there should be a mechanism within Policy DM39 to relax any requirement if it were to threaten the viability of a scheme.</p> <p>Appendix C1 also sets out proposed minimum standards for mobility impaired parking, bicycles and motorcycles but Rowland notes that these are not tailored to different types of development. The standards included are not necessarily relevant to</p>	<p>The requirement, as stated in Appendix C1, is not considered to be onerous and accords with NPPF. In addition, the 2020 Local Plan Viability Study did not raise any viability issues regarding this policy requirement.</p> <p>The 2020 Local Plan Viability Study did not raise any viability issues regarding this policy requirement. NPPF states “...parking and other transport considerations are integral to the design of schemes,</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		residential development and appear to relate better to commercial/retail development. Rowland therefore requests that the wording be amended to make clear what type of development each standard relates to. Any requirements which are applicable to residential development should be such that they would not threaten the viability / deliverability of the site and flexibility embedded into the text which allows for the standards to be applied on a case-by-case basis, dependent on the site's location and characteristics.	and contribute to making high quality places." Mobility impaired, cycle and motorcycle parking are considered essential elements of any parking proposal, whatever the development type.
075	Highways England	Highways England is supportive of Policy DM39 – Transport Requirements for New Development, which establishes the main principles relating to highways, transport and parking which will apply to all site development. Opportunities to promote walking, cycling and public transport use should be prioritised. Transport and highways issues should be considered at the earliest stages of the design process and any additional mitigation measures should be factored into the proposal where traffic generated will impact on the surrounding highway network in future years.	Support Noted.
Policy DM40: Aerodrome Safeguarding			
No comments received			

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
General Comments			
001	Craig Y Don Hotel	<p>Raises concerns about the street parking on Tyldseley Rd, if more house are built as planned.</p> <p>I hope street parking will still be available to visitors. I own the Craig Y Don Hotel on Central Promenade and most our guests park there during their stay. Since the Blundell Street car park was built on, there has been many complaints from visitors that there are no main car parks nearby and being able to park on Tyldseley Rd has encouraged them to continue to book at my hotel and other hotels on the same block. What reassurances can you give me?</p> <p>Furthermore I notice that you intend to landscape more areas, I suggest this starts with releasing more money to maintain the green areas Blackpool already has, the last two years has seen them overgrown with weeds and the grass far too long. I complained to my local councillor who said keeping nurseries and nursing homes open was more important. Same for the graffiti, it just gives an impression of a town in decline.</p>	<p>Comments noted.</p> <p>With respect to the Foxhall Village housing development, parking was an important consideration of the planning application.</p> <p>The proposed redevelopment of the area between Tyldesley Road and Blundell Street was the subject of a planning application ref 19/0103. It is anticipated that some on-street parking space will remain.</p> <p>The Council has recently adopted the Green and Blue Infrastructure Strategy and Action Plan and has also produced a Greening Blackpool SPD which provide guidance on green infrastructure in new development, further adding to Core Strategy policy CS6: Green Infrastructure.</p>
002	Marine Management Organisation	The Marine Management Organisation (MMO) is a non-departmental public body responsible for the	Comments noted.

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>management of England’s marine area on behalf of the UK government. The MMO’s delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.</p> <p><u>Marine Licensing</u></p> <p>Activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. Local authorities may wish to refer to our marine licensing guide for local planning authorities for more detailed information. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local</p>	

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		<p>Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.</p> <p><u>Marine Planning</u></p> <p>As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas.</p> <p>Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the Marine</p>	

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		<p>Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist. _</p> <p>The MMO is currently in the process of developing marine plans for the remaining 7 marine plan areas by 2021. These are the North East Marine Plans, the North West Marine Plans, the South East Marine Plan and the South West Marine Plans.</p>	
004	Trams to Lytham	<p>Development must not compromise the future provision of transport operations, including highways, buses, rail and tram. New housing developments in particular should be progressed only when the travel patterns of residents have been fully addressed.</p> <p>In particular, great care must be taken to safeguard potential options for future extensions of the tramway (for example linking to the South Fylde</p>	<p>The Infrastructure Delivery Plan ensures that infrastructure needs of development set out in the Local Plan are considered. Where appropriate, contributions are sought for infrastructure in accordance with existing Core Strategy Policy CS11: Planning Obligations.</p>

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		Line as identified in the Local Plan Part 1), and vehicle storage locations to support these options (as discussed above).	
009	Ribble Valley Borough Council	Have no comments to make from this authority's point of view.	Comment noted.
010	Defence Infrastructure Organisation	<p>Blackpool has two statutory safeguarding sites within its authority area, these being RAF Woodvale and Warton aerodrome.</p> <p>On reviewing the Local Plan Part 2: Site allocation and development management plan the allocated sites occupy the statutory 91.4m aerodrome height safeguarding consultation surrounding Warton aerodrome.</p> <p>Therefore, we have no safeguarding concerns regarding development within this area. If development were to exceed this height criterion we would need to be consulted.</p>	Noted.
014	R Simpson	Raises concerns over the impact of the additional dwellings on Blackpool's services; hospital beds, A&E spaces, schools, doctors, roads, green spaces etc.	The Infrastructure Delivery Plan ensures that infrastructure needs of development set out in the Local Plan are considered. Where appropriate, contributions are sought for infrastructure in accordance with existing Core Strategy Policy CS11: Planning Obligations.

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015	Historic England	<p><u>Registered Parks and Gardens</u></p> <p>The Plan does not have a policy to deal with registered park and gardens, of which the Local Authority has one Stanley Park (Grade II*). Given the Plan's approach to managing heritage assets is through individual policies covering different asset types, there should be one included for these assets.</p>	<p>Comment noted.</p> <p>A development management policy has now be included for Stanley Park (DM29: Stanley Park) in the Publication version of the Plan.</p>
016	National Grid	We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.	Comment noted.
021	Lancashire Wildlife Trust	Greening Blackpool SPD – We welcome the forthcoming production of this SPD and would recommend that the Council liaise with neighbouring authorities over their Biodiversity SPD's, especially over shared interests such as coastal management, green infrastructure and ecological networks which transcend administrative boundaries.	Comment noted.
024	Department for Education	DfE notes that some growth in housing stock is expected in the borough; the Blackpool Local Plan Part 2: Proposed Site Allocations and Development	Noted. The Council's school place planning team are fully aware of the Local Plan Part 2 and the number of dwellings proposed. These figures have been

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		<p>Management Policies (January 2019) confirms that provision will be made for the delivery of 1074 (net) new homes in Blackpool up to 2027. This will place additional pressure on social infrastructure such as education facilities.</p> <p>The Local Plan will need to be ‘positively prepared’ to meet the objectively assessed development needs and infrastructure requirements.</p> <p>3. We welcome the recognition given within paragraph 3.564 of the role that schools play in creating sustainable neighbourhoods is supported. This section of the document could also emphasise the important role that new schools play in increasing the choice available to parents.</p> <p>4. In light of the requirement for all Local Plans to be consistent with national policy, you will have no doubt taken account of key national policies relating to the provision of new school places, but it would be helpful if they were explicitly referenced or signposted within the document. In particular:</p> <p>- The <i>National Planning Policy Framework</i> (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative</p>	<p>factored into the calculations for school places within Blackpool. In June 2019 the Council issued a School Organisation Pupil Place Plan for the period 2020 – 2028. This considers school places, taking account of proposed housing growth.</p> <p>The Local Plan is being ‘positively prepared’ to meet objectively assessed development needs and infrastructure requirements. However, taking account of the Pupil Place Plan, it is not considered necessary to allocate additional land to allow for the development of new schools, or the expansion of existing schools in Blackpool.</p>

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		<p>approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 94). 2</p> <p>- DfE supports the principle of Blackpool Borough Council safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 94 of the NPPF. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary.</p> <p>- Blackpool Borough Council should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on <i>'Planning for Schools Development'</i>1 (2011) which sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system.</p>	
024	Department for Education	<p>Developer Contributions and CIL</p> <p>One of the tests of soundness is that a Local Plan is 'effective' i.e. the plan should be deliverable over</p>	

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		<p>its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments. DfE note that Blackpool Borough Council does not intend to implement a CIL strategy now, following the CIL viability assessment undertaken in February 2014, by URS Planning and Development.</p> <p>The Infrastructure Delivery Plan helpfully sets where new schools facilities will be required. Where additional need for school places will be generated by housing growth, the plan should also identify the anticipated level section 106 funding that will be secured to pay for the building of new schools, or for the expansion of existing schools. The council could also set out the education infrastructure requirements for the plan period within an Infrastructure Funding Statement². The statement could be reviewed annually to report on the amount of funding received via developer contributions and how it has been used, this would provide transparency to all stakeholders.</p> <p>Local authorities have sometimes experienced challenges in funding schools via section 106</p>	<p>Colleagues in education are currently working on a methodology for calculating Section 106 contributions for education.</p> <p>The IDP has been updated for the Publication version of the plan.</p>

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		<p>planning obligations due to the pooling constraints. However, MHCLG is bringing forward legislation that will remove these constraints. The advantage of using s106 relative to CIL for funding schools is that it is very clear and transparent to all stakeholders what value of contribution is being allocated by which development to which schools, thereby increasing certainty.</p> <p>DfE would be particularly interested in responding to any update to the Infrastructure Delivery Plan or review of infrastructure requirements. As such, please add DfE to the database for future developer contributions consultations.</p>	
025	Natural England	<p>Habitats Regulation Assessment</p> <p>We note that currently, there is no draft versions of the HRA available for comment. We have therefore made the following general comments regarding the content of this document. The HRA needs to consider the following (not an exhaustive list);</p> <ul style="list-style-type: none"> • Impacts on Liverpool Bay/Bae Lerpwl Special Protection Area (SPA), Shell Flat & Lune Deep Special Area of Conservation (SAC), Ribble & 	<p>Comments noted. A Habitats Regulations Assessment and Sustainability Appraisal have been undertaken to support the Local Plan process published alongside the Local Plan Part 2 Publication Version.</p>

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		<p>Alt Estuaries SPA, Ribble & Alt Estuaries Ramsar site, Morecambe Bay Ramsar site and Morecambe Bay & Duddon Estuary SPA,</p> <ul style="list-style-type: none"> • Recreational disturbance, • Land functionally linked to the designated sites, • Air quality impacts, • Water quality impacts. <p>Sustainability Appraisal</p> <p>We note that currently, there is no draft version of the SA available for comment. We therefore recommend that the SA should include (amongst other things) consideration of impacts on Marton Mere Blackpool Site of Special Scientific Interest (SSSI), Wyre Estuary SSSI, Ribble Estuary proposed Marine Conservation Zone (pMCZ) and Wyre-Lune pMCZ.</p>	
050	Blackpool Civic Trust	<p>Blackpool Civic Trust broadly welcomes the Local Plan Part 2.</p> <p>The housing site allocations have been carefully chosen with good use of infill. We welcome the emphasis on quality in housing developments and the detail on developing suitable properties for</p>	Comments and support noted.

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		<p>older people. It is essential that quality housing is built in the borough and where developments are approved they must fit into the street scape. The particular requirements for appropriate student accommodation is noted. We are especially pleased to see that there will be no more conversions of properties into HMOs. This policy needs to be vigorously enforced.</p> <p>We support the emphasis on protecting the existing green belt with the minor changes suggested and welcome proposals for good quality sports facilities. We have in the past objected to planning applications to build on or extend driveways onto garden space and so support the Council's landscaping policy in this matter and in proposals to protect trees and the natural environment. We also support the policies on Archaeology, the Coast and Foreshore, Development in the Countryside, SSIs and Allotments and Community Gardens.</p> <p>Blackpool Civic Trust welcomes the detailed examination of the Promenade as a key area within the town. We have previously raised with the Council our opposition to developments on land to the west of the tram track and so welcome the</p>	

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		<p>statements on this matter. Both visitors and local residents value the "open aspect" of the promenade. We agree that developments at the pier heads would not normally be supported but note that on the piers generally, "appropriate improvements and development which underpin sustainable futures for the three piers.....will be supported." We would welcome clarification of this policy statement. North Pier is Grade II Listed and so should merit special protections. The Local Plan acknowledges that there are some poor quality premises on the promenade. We are pleased that the Council's Core Strategy focusses on "new high quality tourism attractions and visitor accommodation" in the town centre and Resort Core which includes the promenade. Hotels to the east of the Promenade need clear planning guidelines for correcting ad hoc historical development.</p> <p>Given the important national debate on town centres we welcome the detailed proposals for the Blackpool's shopping and leisure areas. We support the proposal to limit the amount of betting shops, pawnbrokers and amusement centres in the town centre. We support the statement at 3.140 to resist applications. We note the comments</p>	

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		<p>regarding further residential development in the town centre and would suggest that such developments should only be allowed at first floor and above if there is rear pedestrian access.</p> <p>Blackpool Civic Trust has in the past objected to planning applications that propose shop fronts with lighting and facias out of keeping with the location and which have industrial style shutters. We therefore support the proposals at Policy DM22 and DM23. We look forward to the production of a Designing Blackpool SPD that will give more details of these issues and others including advertisements and street clutter.</p> <p>We welcome the proposals to limit the number of takeaways in areas where high levels of obesity among school children have been identified. We note that Blackpool Council is adopting the targets that other Councils have adopted. However, given the level of obesity generally in the town, we would suggest that the council looks at strengthening further this proposal.</p> <p>We support the proposals on Tall Buildings and Strategic Views.</p>	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>BCT supports the Council's policy on Heritage. We believe that Blackpool's build heritage should be protected and so we welcome measures to protect our Listed, Locally Listed Buildings and Conservation Areas. We worked with the Council to produce the original Local List and have since added to it, most recently with the Local Listing of the Jubilee Gardens (Gynn). We also submitted an appraisal for a new Conservation Area for the North Promenade which has recently been approved.</p> <p>We welcome the policy to support public art.</p> <p>There is much in the Local Plan Part 2 that is to be welcomed. However Blackpool Civic Trust has reservations about the extent to which the Local Authority has the resources to enforce its policies. We have seen individuals and developers flouting rules, allowing Listed Buildings to deteriorate; residents living in Conservation Areas not applying for the necessary consents etc. We were pleased recently to deliver leaflets produced by the Council in the new Raikes Hall Conservation Area. These leaflets clearly explained the restrictions placed on developments in this area. Up to date Conservation Area Management Plans are essential. Lack of</p>	

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		<p>resources now may mean that pre-application meetings do not take place and the cost of legal action may be prohibitive. This Local Plan gives much of the detail that is needed but in some parts requires the production of SPDs. We share the Council's vision of better quality building and design; of more trees and protected open spaces; protection of our historic buildings and a recognition of just how important our promenade and piers are to residents and visitors alike. But the Council does need to take action to support its Plan if necessary.</p> <p>The Government in setting up the Building Better Building Beautiful Commission is clearly looking at community engagement in development and especially house building. Blackpool Civic Trust wants all residents of the town to be proud of where we live. There is much to be done to achieve that objective but in this document the Council is emphasising the need for quality and we applaud that and wish to be actively involved to achieve the desired end.</p>	
068	K Beardmore	Housing Requirements and Housing Land Supply	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>The Council's Local Plan Part 1 was adopted in 2016 which set a housing requirement of 4,200 dwellings between 2012 and 2027, or 250 dwellings per annum for years 2012-2017 and 280dpa thereafter. Since the start of the Plan period in 2012 to 2018, there was 939 net completions against a housing requirement of 1,530 dwellings; a shortfall of -591 dwellings. It is clear that the Council is underperforming against its housing requirement.</p> <p>The draft consultation paper identifies the Council are only seeking to allocate 1,074 dwellings (including an additional 254 dwellings to account for a 10% slippage rate on sites with permission). Table 1 of the Council's document identifies this is because 1,722 dwellings either have extant permission or are subject to a S106 agreement and a further 719 dwellings will come from a windfall allowance (see extract below). Table 2 of this document identifies that only 1,056 dwellings have been identified on potential housing allocations. A shortfall of -19 dwellings.</p> <p>The windfall allowance comprises 17% of the district's housing requirement which is clearly not insignificant. The Council put this down to conversion of holiday accommodation to</p>	<p>It is acknowledged that there has been a shortfall in net housing completions over the period 2012 – 2018. However, this figure is heavily influenced by demolitions that have taken place associated with Council regeneration initiatives, particularly at Queens Park, where unsuitable accommodation has been replaced with homes more suited to family occupation at lower densities, resulting in a net loss of units. The demolition work at Queens Park has now all been completed and housing completions are increasing and the shortfall decreasing in the borough. 368 completions were recorded for 2018 – 2019 and the shortfall has now decreased to 503 dwellings.</p> <p>Housing figures have been updated for the Publication version of the Local Plan and sufficient provision has been found to meet the housing requirement for the remainder of the plan period, including an allowance for slippage.</p> <p>The Blackpool Core Strategy Inspector considered the issue of windfall housing provision in Blackpool (paragraph 42 of the Inspector's Report). He notes that the majority of windfall site developments in Blackpool are anticipated to be conversions (notably of hotels and guest houses) in the inner areas and</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>permanent residential use but no evidence is provided to demonstrate this is the case. Reliance on windfall sites coming forward for development in order to achieve the housing requirement does not provide the same level of certainty and commitment than would be secured through planned allocated sites, nor is it an approach which should be advocated. The Council do not appear to have undertaken a windfall assessment to establish whether the past rates of delivery which have occurred on windfall sites are likely to continue (i.e. by use class) and provide certainty that this will continue to provide a reliable supply source.</p> <p>4.5 SPRU has populated the chart below using the data contained within Table 2 of the Housing Monitoring Report 2018 which identifies annual gross completions on windfall sites between 2012 and 2018. A linear forecast suggests that based on the completions recorded in years 2012-2018, a contribution from windfall is expected to decline to below 60dpa (or 540 dwellings in the remaining 9 years of the plan period) (chart 1). It is noted levels of windfall completions have declined since the Local Plan Part 1 was adopted in 2016. This is suggestive of a shortfall of -179 dwellings from the anticipated figure of 719 dwellings which suggests additional sites should be allocated to reduce the</p>	<p>that the Council is encouraging such schemes in appropriate circumstances as part of its regeneration strategy. He states that:</p> <p><i>“Given this, the availability of such premises in Blackpool and the evidence of windfall housing development at around 100 dpa in recent years, there is compelling evidence that windfalls will continue to provide a reliable source of housing land supply during the plan period”.</i></p> <p>This is reflected in Core Strategy Policy CS2, which identifies windfall housing as one of the three sources of housing provision in Blackpool. The supporting text states that a windfall allowance of around 1,500 homes (which equates to 100 dwellings per year over the plan period) is the final component of Blackpool’s housing supply, with the majority expected to come forward from conversions and bringing back long term empty properties into use. Therefore, the inclusion of a windfall allowance of 100 dwellings per year is a fundamental and accepted part of the Blackpool housing supply, reflecting the distinctive characteristics of the town.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>potential impact of under delivery and subsequently not meeting the housing requirement.</p> <p>Clearly, the Council have a track record with under delivering against the housing requirement and the evidence points towards a lack of housing sites suitable of meeting the housing requirement of 4,200 dwellings by 2027. It is our view that additional sites should be allocated to ensure the housing requirement will be met and a shortfall does not persist. A small site, such as our client's, is in a sustainable location and can be delivered quickly which will assist current and future shortfall.</p> <p>Therefore, we object to the level of housing sites proposed. Additional sites should be allocated to ensure the housing requirement is met and an under delivery does not occur. We recommend the list of potential housing sites is amended to include our site as a potential housing allocation.</p>	<p>Table 2 of the Housing Monitoring Report 2018 only reports on completed windfall dwellings on sites with planning permission. However, in Blackpool significant numbers of dwellings occur through other sources. Significant numbers of dwellings are delivered annually through lawful development certificates and for prior approval for changes of use. These are shown in Table 9 of the Housing Monitoring Report 2018. The number of windfall dwellings regularly exceeds 100 dwellings per year taking these units into account. Up-to-date information is set out in the Housing Topic Paper and 2019 Housing Monitoring Report.</p> <p>Core Strategy Policy CS23 allows more hotels and guest houses to change to residential uses than previous policy approaches and the Council has also recently created a housing company that is acquiring, converting and renovating property to create high quality homes for rent. Therefore, the delivery of significant numbers of dwellings through conversions/changes of use on windfall sites is predicted to continue. Therefore, there is compelling evidence to include a windfall allowance of 100 dwellings per year in Blackpool's anticipated supply figure.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
			<p>The publication version of the Local Plan Part 2 is informed by updated evidence in relation to the sites and supported by an updated Strategic Housing Land Availability Assessment. The Council considers that sufficient housing provision can be identified without requiring the development of part of the Countryside Area between Newton Hall and Mythop Road. The allocation of this site would have a very limited impact in terms of overall housing supply.</p> <p>This site lies outside of the existing urban area, or the South Blackpool Growth area, and is not in conformity with Core Strategy Policy CS2. The estimated number of dwellings suggested on the submitted form (7) is below the 10 dwelling site size threshold for allocation proposed in the publication version of the Local Plan Part 2.</p>
065	McCarthy and Stone	<p>Appendix C1: Proposed Parking Standards</p> <p>It is considered that the parking and cycle standard of 1 space per unit for Sheltered Housing is very high and does not relate to the nature of the accommodation. It is widely accepted that the car parking requirements for retirement (Category II) housing and extra care housing are significantly lower than for general needs housing. McCarthy and Stone have managed to successfully argue this</p>	<p>Comments noted. Given the trend for older people to have increased mobility and given the parking requirements of non-residents need to be accommodated, e.g. visitors, it does not seem unreasonable to specify a higher parking requirement than at present. Therefore, the parking standard for sheltered housing has been</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>point both through the planning application process and at appeal. It is abundantly clear the parking requirements of specialist accommodation for the elderly are lower than those of general needs housing. By not providing clear and appropriate guidance for these forms of accommodation the Council is proposing unrealistic and unjustifiable provision of 1 space per dwelling.</p> <p>It is also unclear how the Parking Standards for Extra Care Accommodation (Use Class C2) as it is not included within the C2 Parking Standards. Clarification on this point is therefore welcomed.</p>	<p>altered to one parking space per two dwellings, currently one parking space per three dwellings.</p> <p>For clarity, residential care homes have been added to the Parking Standards.</p>
066	Environment Agency	<p>Surface Water Management</p> <p>As mentioned in our response to the Local Plan Part 2 scoping document, we recommend that the LPA considers additional policies to build upon Policy CS9: Water Management of the adopted Local Plan: Part 1 in relation to flood risk mitigation requirements and reducing impacts on water quality, in particular bathing waters, through details SUDS requirements.</p>	<p>Comments noted. An additional development management policy on Surface Water Management (DM31) is now included in the Publication Version addressing the concerns raised.</p>
067	United Utilities	<p>Surface Water Management</p>	

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>In accordance with national planning policy on the discharge of surface water, United Utilities expects that surface water from the site will be disposed of via the most sustainable drainage option available and that sustainable drainage systems should be an integral part of any redevelopment proposal. We would be looking to secure this, again at the planning application stage by way of suitably worded conditions.</p> <p>United Utilities recommends that the Authority control surface water management, in line with the following order of priority, in accordance with National Planning Practice Guidance:</p> <ol style="list-style-type: none"> 1. into the ground (infiltration); 2. to a surface water body; 3. to a surface water sewer, highway drain, or another drainage system; 4. to a combined sewer." <p>United Utilities cannot emphasise highly enough the importance of applying the surface water hierarchy for the discharge of surface water in a rigorous and consistent manner especially in an era when the impacts of climate change are ever more present.</p>	<p>Comments noted. An additional development management policy on Surface Water Management (DM31) is now included in the Publication Version addressing the concerns raised.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>We would be keen to see a policy within your Local Plan Part 2 that makes reference to the requirement for developments to control surface water in accordance with the surface water drainage hierarchy referred to above.</p> <p>We would be happy to have an input into policy wording if this would be helpful. The treatment and processing of surface water is not a sustainable solution. Surface water should be managed at source and not transferred. Every option should be investigated before discharging surface water into a public sewerage network. There will be an expectation for surface water to be discharged to ground via infiltration in the first instance. Applicants wishing to discharge to the public sewer will need to submit clear evidence demonstrating why alternative options are not available.</p> <p>The preference will be for new development to include genuine sustainable drainage systems (SuDS) as opposed to underground tanked storage systems for surface water.</p>	

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		<p>SuDS are now seen as a local, design-led issue and an integral part of the planning process, and offer visionary designers and masterplanners opportunities, rather than just technical problems to be solved. We wish to highlight that they should be considered as one of the key design considerations from the very start of projects, exploring innovative solutions that form an integral part of the overall scheme.</p> <p>Developers should seek to maximize opportunities for using space in a multi-functional way and for enabling SuDS features to form part of the character of the development. Open space and recreation provision in new developments present a clear opportunity to provide much needed SuDS, whilst also contributing to quality neighbourhoods, providing opportunities for wildlife and enhancing the leisure and play on offer, resulting in a significant positive health effect.</p>	
075	Highways England	<p>Transport Evidence Base</p> <p>The <i>Marton Moss / M55 Hub Traffic Impact Assessment Study</i> was prepared by Halcrow in 2011. It sought to assess the transport implications associated with a number of development proposals within the Local Plan Part 1 (Core</p>	<p>It should be noted that the Council is no longer pursuing Marton Moss / M55 Hub as a sustainable urban extension. This approach was removed from the Local Plan Part 1: Core Strategy prior to it progressing to Pre Submission.</p>

Respondent No.	Name/Company	Comment	Council Response (Amendments to plan in bold)
		<p>Strategy), and to identify appropriate solutions that seek to deal with the specific issues identified. Marton Moss / M55 Hub is identified as a sustainable urban extension required to meet economic and growth aspirations.</p> <p>Whilst the assumptions used in the assessment and the findings of the report were relevant at the time of writing back in 2011, it is considered that this needs to be updated to reflect the change over time, and the quantum of development delivered between 2011 and 2018. In this regard, Highways England would be happy to discuss the possibility of the Council being able to utilise more recent SATURN modelling associated with our current A585 Windy Harbour to Skippool Bypass project to assist in this regard.</p> <p>However, as it is cited, while providing a suitable piece of evidence to support the LDF, being a broad and strategic assessment, it should be recognised that the analysis undertaken as part of the study does not provide the detail required to support the development proposals through the planning application process. As any development proposal comes forward in the area through the planning process, there will be a need for them to</p>	<p>Highway requirements for new development including the need for transport assessments are set out in Policy DM41: Transport requirements for new development of the Publication version of the Local Plan Part 2 and also the adopted Core Strategy. Highway considerations in relation to housing site allocations are set out in Schedule 1 of the Publication Version and the Housing Topic Paper.</p> <p>With respect to comments made on the Fylde Coast Highways and Transport Masterplan, the document was prepared by Lancashire County and it is therefore their responsibility for updating.</p>

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		<p>be supported by appropriate transport analysis through the provision of site-specific detailed Transport Assessments.</p> <p><i>The Fylde Coast Highways and Transport Masterplan 2015 (HTM)</i> talks about a number of strategic highway schemes which are necessary in the region to tackle the issues of congestion, coherently opening avenues for the key employment sites and contributing towards the economy. One such scheme proposed is the A585 Windy Harbour – Skippool Improvements by Highways England. It is crucial that traffic modelling figures from the latest accepted model be used to inform any decisions relating to the transport impact of sites located in close proximity of the M55 Junction 4.</p> <p>It is not clear what the status is of the long list of projects identified in the HTM within the section entitled Milestone. It is suggested that this section of the document is updated to reflect the timeline for implementation of these schemes, to show whether they are proposed to be delivered in future, currently under construction, approved or completed.</p>	

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		<p>Highways England welcomes the provision and promotion of sustainable modes of transport to access the proposed site allocation. In addition, it should be noted that any requirement for highway improvements related to M55 J4 will need to be agreed in principle with Highways England. As such, it is recommended that a minor change to wording within the policy is required to reflect this need.</p> <p>In line with guidance set out in National Planning Policy Framework (NPPF) the site allocations should be appropriately supported by transport assessments and travel plans. Highways England should be consulted for all relevant sites in close proximity to the M55 Junction 4, that in future could cause an impact on the safety and operation of the SRN.</p> <p>Highways England has requested some minor amendments to the draft SoCG, to reflect the requirement for Blackpool Council to have on-going dialogue with Highways England to ensure that appropriate strategic transport infrastructure improvements will be identified to support</p>	

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		<p>proposed growth and benefit local, sub-regional and national connectivity.</p> <p>For sites of key strategic importance such as Marton Moss / M55 Hub, it is considered that the modelling information, including the background growth and any other relevant assumptions should be updated to the current standards. It is recommended that the Council makes use of any strategic models available in the vicinity to assess the impact of such sites.</p> <p>Highways England welcomes the fact that there are many schemes identified in the Core Strategy, draft Local Plan Part 2 and HTM, that encourage the provision of sustainable transport measures in the region of Blackpool including the hinterland. These measures will help to support sustainable development, reduce the reliance on private car usage and contribute towards reducing carbon emissions and improving health benefits, whilst at the same time encouraging economic growth and tourism.</p>	