

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

**Matter 5: Are the SADMP's development management policies justified, effective, consistent with national policies and clearly and unambiguously written so it is evident how a decision maker should react to development proposals?**

**Blackpool Council Statement**

November 2021

**Blackpool Council**

The logo graphic consists of two horizontal, wavy lines in a light blue-grey color, positioned below the text 'Blackpool Council'.

## Introduction

This Statement has been produced by Blackpool Council to outline its response to the Matters, Issues and Questions raised by the Inspector for the Hearings into the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Document (SADMP) ([SD001](#)).

The Statements form the main basis for the Council's submission to the Hearings. Where appropriate the Statements draw upon and cross reference to the main sources of information used in the preparation of the SADMP. To assist, document numbers are referenced and links are provided where appropriate.

The Council also wishes to respond and engage constructively with the Inspector and in the Council report of February 2021 the Council formally requested, pursuant to Section 20 (7c) of the 2004 Act, that the Inspector recommends any necessary modifications to the Plan to make the Plan satisfy the appropriate requirements and soundness.

## References:

- [National Planning Policy Framework 2021](#)
- [National Planning Practice Guidance](#)
- [National Design Code](#)
- [Nationally Described Space Standards](#)
- [SADMP – SD001](#)
- [Schedule of Proposed Main Modifications \(Aug 21\) \(EL1.002b\)](#)
- [Blackpool Local Plan Part 1: Core Strategy \(adopted January 2016\) \(AD004\)](#)
- [Space Standards and Accessible Homes Topic Paper](#) (EB012)
- Local Plan Viability Assessment ('LPVA') (EB002)
- [Fylde Coast Strategic Housing Market Assessment \(2013\)\\*](#)
- [ONS.gov.uk – One in eight has no garden](#)
- 'Extending Your Home' SPD\*
- Appeal Decisions APP/J2373/W/20/3261988 and APP/J2373/W/20/3259559\*
- Statement of Common Ground with Historic England ([EL1.004b](#))
- [Holiday Accommodation Supplementary Planning Document \(SPD\) \(2017\)\(AD009\)](#)
- [New Homes from Old Places](#) SPD(AD010)
- [Student Accommodation Advice Note 2007\\*](#)
- Blackpool, Retail, Hotel and Leisure Study ([EB017](#))
- SoCG between Blackpool Council and Historic England ([EL1.004b](#))
- Betting Shops, Adult Gaming Centres and Pawnbrokers Topic Paper (2020) ([EB010](#))
- Local Centres Assessment ([EB016](#))
- [Managing the Location of Hot Food Takeaways Topic Paper](#) (EB009)

## References (cont'd):

- [Open Space Assessment 2019](#) (EB022)
- Statement of Common Ground with Historic England ([EL1.004b](#))
- Climate Change and Renewable Energy Study (2010)([EB030](#))
- Lancashire Sustainable Energy Study (2011) ([EB031](#))
- SADMP Sustainability Appraisal (SA) and Strategic Environmental Assessment - [SD005](#) and [SD005a](#)
- [SoCG between Blackpool Council and Natural England – EL1.004c](#)
- [Public Health England – Obesity and the Environment](#) 2017
- [LCC Hot Food Takeaways and Spatial Planning](#)
- [Built Heritage Strategy](#) (EB028)
- [Blackpool Heritage Characterisation Study 2009](#) (EB029)
- [Blackpool Council Plan](#)
- [Wyre Local Plan 2011-2031](#)
- Air Quality Management Areas – DEFRA Website
- [Blackpool Local Plan 2001 – 2016](#) (AD006)
- [Joint Lancashire Structure Plan \(Adopted 2005\) – Access and Parking Standards](#)
- [Blackpool Climate Change Emergency Declaration 2019](#)
- [Local Health Authority Profile](#)

\*Submitted to the Examination Library

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Position of the Council regarding Matter 5

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Questions:

**1. Is the requirement in Policy DM1 for 20% of all new build dwellings to meet the Nationally Described Space Standard justified by local evidence? Have the viability implications of this requirement been adequately considered?**

1.1 (NPPF21) requires that new development contributes to ‘sustainable development’. It defines sustainable development in terms of economic, social and environmental dimensions. It supports ‘strong, vibrant and healthy communities’ (para 8), and confirms that policies should ensure developments create places that are safe, inclusive, accessible and which promote health and well-being, with a high standard of amenity for existing and future users (para 130).

1.2 The NPPF and the design section of the National Planning Practice Guidance ([NPPG](#)) makes it clear that in preparing plans and making decisions, local authorities should use the National Design Guide. The [National Design Guide](#) paragraphs 120 – 121 confirms that well-designed homes and buildings are functional, accessible and sustainable. They provide internal environments and associated external spaces that support the health and wellbeing of their users and all who experience them. They meet the needs of a diverse range of users, taking into account factors such as the ageing population and cultural differences. They are adequate in size, fit for purpose and are adaptable to the changing needs of their occupants over time. Paragraph 152 of the National Design Guide confirms that well designed buildings are adaptable to their users’ changing needs and evolving technologies over time.

1.3 The Spatial Portrait of Blackpool in the Blackpool Local Plan Part 1: [Core Strategy \(summarised on page 18\)](#) describes the key social issues that the town faces, including:

- Intensely urban, densely populated with a high concentration of acute deprivation

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- Extreme health, social and economic inequalities
- High unemployment and low, seasonal wages
- Low educational attainment
- Unbalanced housing market characterised by an oversupply of poor quality accommodation, unsuitable for family occupation
- Small, poor quality accommodation in the Inner Area attracting low income and vulnerable households, leading to crime, anti-social behaviour and unstable fragmented and highly transient communities.

1.4 Core Strategy Policy CS12: Sustainable Neighbourhoods (page 74), supports development which provides high quality housing with an appropriate mix of types and tenures to meet the needs and aspirations of existing and future residents and assists in rebalancing the housing market. Whilst CS12 focuses on the Inner Area and the outer estates, paragraph 6.5 in the supporting text to CS12 confirms that the approach to achieving sustainable communities will be applied across the Borough.

1.5 Core Strategy Policy CS13: Housing Mix Density and Standards (page 79), requires new housing development to contribute towards a balanced mix of housing provision and requires quality living accommodation which meets the relevant standards in places for conversions and new builds. Policy CS13 confirms that consideration will be given to applying the [Nationally Described Space Standard](#) through the preparation of the SADMP, subject to the required consultation process and viability assessment.

1.6 The [Space Standards and Accessible Homes Topic Paper](#) (document EB012) provides evidence base which supports the inclusion of the requirement in Policy DM1 for 20% of all new build dwellings to meet the Nationally Described Space Standard (NDSS).

1.7 Establishing a better housing offer in Blackpool through the development of good quality family sized homes which are suitable for the needs of their occupants, will enable people and their families to stay in their homes over a longer term and will assist in rebalancing the housing market. Good quality housing will also help improve health and wellbeing, social mobility, educational attainment and will reduce transience and overcrowding and assist in creating stable, healthy and resilient communities. Having homes that are flexible and can respond to changing situations such as a pandemic, enables people to live and work comfortably at home.



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1.8 The Topic Paper at paragraph 3.2 confirms that the Council have successfully been applying NDSS to residential conversions since 2015 with very little resistance from developers.

1.9 Paragraphs 3.13 – 3.21 confirms that out of 30 housing schemes which have been granted planning permission since 2013 (a total of 1,702 houses), only 3.1% of the houses were 100% compliant with the NDSS, so for example, all rooms labelled as a bedroom, met the minimum space requirements for the intended occupiers. The smaller, more affordable 1, 2 and 3 bedroom houses frequently fall short of NDSS in terms of gross internal floorspace and bedroom sizes. Of the schemes assessed, secondary bedrooms were consistently under standards and some standard house types provided bedrooms unsuitable for a full size single bed and other furniture or space to play or study. This is problematic as the good quality, more affordable family housing that Blackpool so desperately needs, is not coming forward, particularly in major housing schemes.

1.10 The Council therefore, considers that the requirement in Policy DM1 for 20% of all new build dwellings to meet the Nationally Describer Space Standard is justified by local evidence.

1.11 In terms of viability, the Council appointed Lambert Smith Hampton (LSH), a suitably qualified and experienced consultancy, in June 2019 to advise on and prepare a Local Plan Viability Assessment ('LPVA') ([EB002](#)) of the emerging SADMP including the draft requirements set out in the emerging Affordable Housing Supplementary Planning Document (SPD) and [draft Greening Blackpool SPD](#) in conjunction with the adopted Core Strategy and adopted SPD's.

1.12 LSH has reviewed the adopted Core Strategy and the emerging site allocations and development management policies to identify whether adopted and emerging policies will have a direct, indirect or no impact on development viability. The viability impact matrix is included at Appendix 1 to the LPVA. At paragraph 3.9 of the LPVA LSH determined which policies in the SADMP will have a direct viability impact and listed 5 policies which included DM1.

1.13 In undertaking the viability assessment of a range of sites across the borough, LSH set out their conclusions and recommendations in Chapter 9 of their assessment. LSH highlight that overall the viability modelling identifies a mixed picture of viability and that this picture is not uncommon with their experience of site specific and plan-wide viability in neighbouring authorities and across the wider region.

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1.14 When Policy DM1 was first drafted, it required that 100% of new build homes met the NDSS. In paragraph 9.6 of the LSH report, it states that applying all (NDSS) requirements to 100% of dwellings will exacerbate viability challenges. The report stated that a number of authorities have introduced policies requiring homes are built to NDSS but have adopted 20 or 40% targets and that a similar approach could be adopted in Policy DM1, although given the more challenging viability context in Blackpool, a 20% target was recommended. Policy DM1 was amended in accordance with the LSH recommendations to ensure that housing could come forward viably in Blackpool. As such, the Council considers that the viability implications of Policy DM1 requiring 20% of all new build dwellings to meet the NDSSs, have been adequately assessed.

**2. Is the requirement in Policy DM1 for sites of 10 dwellings or more to provide at least 10% of dwellings which meet technical standard M4(2) or M4(3) of the Building Regulations justified by evidence which shows this would address an identified need for such properties? Should the SADMP distinguish between M4(3)a and M4(3)b housing?**

2.1 The NPPF21 requires that new development contributes to 'sustainable development'. It defines sustainable development in terms of economic, social and environmental dimensions. It supports 'strong, vibrant and healthy communities' (para 8), and confirms that policies should ensure developments create places that are safe, inclusive, accessible and which promote health and well-being, with a high standard of amenity for existing and future users (para 130).

2.2 The NPPF and the design section of the NPPG makes it clear that in preparing plans and making decisions, local authorities should use the National Design Guide. The [National Design Guide](#) paragraphs 120 – 121 confirms that well-designed homes and buildings are functional, accessible and sustainable. They provide internal environments and associated external spaces that support the health and wellbeing of their users and all who experience them. They meet the needs of a diverse range of users, taking into account factors such as the ageing population and cultural differences. They are adequate in size, fit for purpose and are adaptable to the changing needs of their occupants over time. Paragraph 152 of the National Design Guide confirms that well designed buildings are adaptable to their users' changing needs and evolving technologies over time.

2.3 Blackpool Local Plan Part 1: [Core Strategy](#) Policy CS7 (Quality of Design) requires development to be accessible to special groups in the community such as those with disabilities and the elderly. The [Space Standards and Accessible Homes Topic Paper](#)

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(document EB012) is the evidence base which supports the inclusion of the requirement in Policy DM1 for sites of 10 dwellings or more to provide at least 10% of dwellings which meet technical standard M4(2) or M4(3) of the Building Regulations. This Topic Paper explains the issues around our ageing population and the problems that older people experience when living in homes that are unsuitable for their needs, such as fuel poverty in older, larger housing and trips and falls.

2.4 The ageing population of Britain presents a new challenge for housing. The number of people living over and above the age of 65 is increasing at a faster rate than all other age groups and the over 65's are more likely to have a mobility impairment or disability. The Office of National Statistics (ONS) projects an increase of 39% in people aged 65 and over living in England by 2030 (v's 2014). It is projected the number of people aged 80 and above will more than double by 2037 and the number of people aged over 90 will triple. Blackpool specifically will see a 28% increase in residents aged 65+ within the next 25 years (2017 population projection) which will have a direct impact on housing provision and related services.

2.5 Housing provision in Blackpool reflects the overall national picture in not adequately meeting the diverse needs and aspirations of the current and projected older population. National and local research has found that older people prefer to remain in their own homes for as long as possible. However, in Blackpool since 2010 there has been a 72% increase in residents moving into permanent care and unsuitable housing is becoming an increasing factor in the decision to place people into a care setting. As such, the strategy in the Council's [Housing Plan for the Ageing Population](#) is to support people to remain independently at home for as long as possible, creating a sense of security and reducing the demand on care homes and hospitals.

2.6 A substantial proportion of older person households currently under-occupy their homes and there is a lack of provision of homes designed for older people's needs. It is therefore important to provide more appropriate and accessible new homes in the general market. [The Fylde Coast Strategic Housing Market Assessment](#)<sup>1</sup> states there exists the potential to 'free up' existing family housing through the provision of appropriate accessible dwellings which match the aspirations of a growing older person cohort. Given the shortage of good quality family housing in Blackpool, this is a particularly important issue to address.

2.7 As such, the Council considers that the requirement in Policy DM1 for sites of 10 dwellings or more to provide at least 10% of dwellings which meet technical standard M4(2)

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or M4(3) of the Building Regulations is justified by evidence which shows this would assist the Council in addressing an identified need for such properties.

2.8 With regards to the need to distinguish between M4(3)a and M4(3)b housing, section 3A covers the approach to a dwelling and section 3B covers private entrances and spaces within and connected to the dwelling. Approved Document M states that all of the provisions of Section 3A and 3B apply to wheelchair adaptable and wheelchair accessible dwellings.

2.9 The Council therefore considers it would unnecessary to distinguish between M4(3)a and M4(3)b housing.

**3. What is the justification for the requirement in Policy DM1 for outside space to be at least the size of the footprint of the house? Are the minimum internal dimensions for garages justified? Does the policy adequately deal with context?**

Outside spaces

3.1 The NPPF21 requires that new development contributes to 'sustainable development'. It defines sustainable development in terms of economic, social and environmental dimensions. It supports 'strong, vibrant and healthy communities' (para 8), and confirms that policies should ensure developments create places that are safe, inclusive, accessible and which promote health and well-being, with a high standard of amenity for existing and future users (para 130).

3.2 The Council considers that access to adequate private outdoor space can play an important role in the physical and mental health and wellbeing of people. Access to daylight, fresh air, space to dry washing, space to socialise, space to play in, space to enjoy wildlife and a place to grow plants/vegetables etc can add significantly to the quality of life of residents of all ages. The Council does not currently have any space standards set out in planning policy for private amenity space in new housing development, yet private amenity space is important to health and wellbeing and can also provide valuable green and blue infrastructure benefits. A proportion of housing developments coming forward in Blackpool are on smaller brownfield, infill sites and in gardens where space is tight and amenity space is treated as a 'nice to have' rather than a 'must have'.

3.3 In Blackpool, particularly in the densely urban Inner Area, much of the housing stock has little or no meaningful amenity space other than small hard surfaced yards to store

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refuse bins and garden areas where provided, are small and unsuitable to meet the needs of the families. A [publication in 2020](#) by the ONS confirmed that one in eight (12.5%) of British households has no garden. In central Blackpool, 16% of households have no access to private or shared amenity space.

3.4 It is important that private amenity space is provided and is sufficient to meet the needs of the occupiers. Smaller houses don't need as much amenity space as a larger family sized home, but all should be able accommodate passive and active recreational needs and green infrastructure.

3.5 Rather than setting out garden space standards dependant on the number of bedrooms in a dwelling, the Council considers that the footprint of the building, if big enough for the needs of the occupants, would be a sufficient size for its private amenity space as a minimum. However, the full sentence in DM1 states that private amenity space should be at least the equivalent size of the footprint of the house or reflect garden sizes in the area, and when read alongside the other requirements of DM1 in terms of new housing development taking account of local character and distinctiveness, the streetscene, building lines and patterns of development, there is flexibility in terms of what would be an appropriate size for a new dwellings' amenity space, in its site context.

3.6 The requirements of DM1 would not outweigh standard separation distances in new housing development.

3.7 The Council considers that the requirement in Policy DM1 for outside space to be at least the size of the footprint of the house is proportionate and justified and that DM1 adequately deals with context.

#### Garage sizes

3.8 In terms of garage sizes, over recent decades, cars have become much larger to accommodate safety devices such as crash beams, airbags and crumple zones. Using the Ford Focus as an example, the most recent model is 37% larger than the first generation. A new BMW 3 series is 27% wider and 7% longer than the 1983 model and a new Mini is 33% wider and 22% longer than the Mini of the 1950's. The ways that cars can be financed now also means that more people can affordably buy a larger, more luxurious car.

3.9 The average family car now measures 4.4m x 1.8m and some family cars and popular SUV's are much larger. In order for a garage to count as a parking space, there needs to be

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sufficient space to accommodate a car, for the doors to be opened and for circulation space around the car.

3.10 The '[Extending Your Home](#)' SPD<sup>2</sup> is a joint SPD prepared by Blackpool Council and neighbouring Fylde and Wyre Borough Council's, which was adopted in 2007. The SPD sets out design guidance for various types of home extensions. Design Note 1 (point 20) states that a new garage must have internal dimensions of 6m by 3m in order for it to be counted as a car parking space. All three authorities have been successfully implementing the requirements of the SPD, including the internal dimensions requirements for new garages since its adoption. However, there are no such space standards for garages which come forward in new housing development.

3.11 Even in more recently constructed housing estates, quite often there is insufficient room in the garages to park a car and open the car doors inside. The Council frequently receives applications to remove restrictive conditions placed on garages which were imposed on a decision notice, as the garages aren't fit for purpose. Modern housing estates often have narrow winding roads and cul-de-sacs which aren't suitable for on-street car parking, but when there are insufficient off-street car parking spaces (because the garages aren't useable), this leads to street parking and congestion, makes it difficult for pedestrians to negotiate around parked cars and is damaging to visual amenity.

3.12 Having the internal dimensions of a garage measuring 6m x 3m, a garage can function as a parking space with room for bicycles and can facilitate the charging of electric cars, which would encourage more sustainable modes of travel.

3.13 The Council considers that the internal dimensions for garages is justified.

**4. Are the requirements in Policy DM2 (1a-g) supported by local evidence? Is the requirement for a section 106 agreement tying any such development to the dwelling necessary and justified? Is this consistent with paragraph 57 of the NPPF?**

4.1 The National Planning Policy Framework requires that new development contributes to 'sustainable development'. It defines sustainable development in terms of economic, social and environmental dimensions. It supports 'strong, vibrant and healthy communities' (para 8), and confirms that policies should ensure developments create places that are safe,

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inclusive, accessible and which promote health and well-being, with a high standard of amenity for existing and future users (para 130).

4.2 The Spatial Portrait of Blackpool in the Blackpool Local Plan Part 1: [Core Strategy \(summarised on page 18\)](#) describes the key social issues that the town faces, including:

- Intensely urban, densely populated with a high concentration of acute deprivation
- Extreme health, social and economic inequalities
- High unemployment and low, seasonal wages
- Low educational attainment
- Unbalanced housing market characterised by an oversupply of poor quality accommodation, unsuitable for family occupation
- Small, poor quality accommodation in the Inner Area attracting low income and vulnerable households, leading to crime, anti-social behaviour and unstable fragmented and highly transient communities.

4.3 The Council considers that access to adequate private outdoor space can play an important role in the physical and mental health and wellbeing of people. Access to daylight, fresh air, space to dry washing, space to socialise, space to play in, space to enjoy wildlife and a place to grow plants/vegetables etc can add significantly to the quality of life of residents of all ages.

4.4 Development proposals for residential annexes come forward in residential gardens and can significantly reduce the amount of available private amenity space, whilst introducing more pressures on that amenity space through the merging or enlarging of households. This isn't such an issue for detached houses on larger plots. However, much of the housing stock in Blackpool is terraced and semi-detached housing on small plots and it is important to ensure that an annex does not significantly reduce the functionality of the amenity space.

4.5 As with all well designed extensions and outbuildings, it is important that annex development does not visually dominate the main dwelling and that new development it is subservient in terms of size and scale and use of materials.

4.6 There are many examples in Blackpool of annexes being used as separate dwellings which have become lawful through the passage of time. These annexes are often very small, with no amenity space, poor access along back streets, inadequate refuse or parking provision and add to the poor quality housing stock that the Council is trying to re-balance.

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4.7 If the annex is functionally linked to the main house, in that it doesn't have its own independent access, there are some shared facilities, it is not separated by fencing which could demarcate a new curtilage, then the annex is less likely to lend itself to independent occupation once the householder no longer needs it for its original intended purpose.

4.8 The Council do condition planning permissions to state that such development must remain ancillary to the main dwelling, however annexes by their very nature are often tucked away and out of sight and if such a condition is breached over a 4 year period, the Council cannot enforce the condition. A Section 106 agreement however, would sit with the land in perpetuity and any breach can be robustly enforced at any time. Given the poor quality housing stock in Blackpool and the need to re-balance and improve it, it is considered important that the Council has control to ensure that an annex does not become a separate planning unit through unauthorised use and the passage of time.

4.9 As such, the Council considers that the requirement in DM2 that the applicant enter into a Section 106 agreement, tying the occupation of the annexe to the existing dwelling is considered necessary and would therefore be in accordance with paragraph 57 of the NPPF.

**5. Are the limits to supported accommodation or housing for older people set out in Policy DM3 of no more 10% of any one block and no such accommodation where there is existing supported accommodation within 400 metres justified and effective? How will 400 metres be measured?**

5.1 The approach taken to limit over-concentrations of supported accommodation or housing for older people is considered to be justified and effective. The policy supports the Council's wider aims to create more balanced and healthy local communities and in order to avoid over-concentrations the uses identified in the policy which can impact on the character and function of residential areas.

5.2 It should be noted that this is a policy approach that has been effective for a number of years through adopted Local Plan Policy BH24 and an accompanying advice note. The Council have recently been supported at appeal by the Planning Inspectorate with respect to the issue of over-concentration (Appeal Refs APP/J2373/W/20/3261988 and APP/J2373/W/20/3259559<sup>3</sup>).

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<sup>3</sup> Submitted to the Examination Library



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5.3 The 400m is to be measured 'as the crow flies' as the policy deals with the spatial distribution of the identified uses and geographical concentration of uses within an area. For clarity, the Council are content to accept a modification that explains this in the supporting text.

**6. Is the requirement in Policy DM4 to demonstrate a need for student accommodation justified? Is the requirement for such proposals to be within 800 metres of a university or a sequential approach with preference for sites on or close to public transport routes justified? Is it clear what is required for the sequential approach? How would 800 metres be measured?**

6.1 The NPPF21 requires that new development contributes to 'sustainable development'. It defines sustainable development in terms of economic, social and environmental dimensions. It supports 'strong, vibrant and healthy communities' (para 8), and confirms that policies should ensure developments create places that are safe, inclusive, accessible and which promote health and well-being, with a high standard of amenity for existing and future users (para 130).

6.2 The Spatial Portrait of Blackpool in the Blackpool Local Plan Part 1: [Core Strategy \(summarised on page 18\)](#) describes the key social issues that the town faces, including:

- Intensely urban, densely populated with a high concentration of acute deprivation
- Extreme health, social and economic inequalities
- High unemployment and low, seasonal wages
- Low educational attainment
- Unbalanced housing market characterised by an oversupply of poor quality accommodation, unsuitable for family occupation
- Small, poor quality accommodation in the Inner Area attracting low income and vulnerable households, leading to crime, anti-social behaviour and unstable fragmented and highly transient communities.

6.3 Core Strategy Policy CS12: Sustainable Neighbourhoods (page 74), supports development which provides high quality housing with an appropriate mix of types and tenures to meet the needs and aspirations of existing and future residents and assists in rebalancing the housing market. Whilst CS12 focuses on the Inner Area and the outer estates, paragraph 6.5 in the supporting text to CS12 confirms that the approach to achieving sustainable communities will be applied across the Borough.

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### **Demonstrating the need for student accommodation**

6.4 Blackpool and the Fylde College is currently located on two main campuses in Blackpool, Bispham Campus and Palatine Road Campus. Bispham Campus attracts students from a more local catchment and doesn't have a high demand for student accommodation. However, the Palatine Campus attracts students from across the UK and internationally and therefore there is a demand for good quality student accommodation around the Palatine Campus. The Palatine Campus and much of the associated student accommodation is within the Inner Area.

6.5 In March 2011 the Council adopted two new planning policy documents, the [Holiday Accommodation Supplementary Planning Document \(SPD\) \(AD009\)](#) (updated in 2017) and the [New Homes from Old Places SPD \(AD010\)](#). The first considered the need to reduce the quantum of holiday floorspace within the resort and concentrate provision on those areas considered to be the most successful and financially viable in accordance with Core Strategy Policy CS23. It identified six Main Holiday Accommodation areas away from the Promenade, as well as stretches of accommodation along the Promenade, as warranting ongoing protection. These areas are much smaller than the Resort Neighbourhoods identified on the Proposals Map to the Blackpool Local Plan 2006. The second SPD sought to require a higher standard of permanent residential accommodation created through conversions in accordance with Core Strategy Policies [CS12, CS13 and CS23](#) and Saved Policy HN5.

6.6 Following the reduction in the size of the protected holiday areas, pressure for the provision of student accommodation near the Palatine Road Campus which was no longer safeguarded for holiday use, increased noticeably.

6.7 As a result, the Council worked with Blackpool and the Fylde College to update a [Student Accommodation Advice Note 2007](#)<sup>4</sup>. That Advice Note does not form part of the statutory Development Plan but seeks to clarify and explain the Council's policies and approach to the provision of student housing. The Advice Note stipulates that planning permission will not be granted for new student accommodation provision unless a quantitative need can be demonstrated. The Advice Note requires developers to provide confirmation from Blackpool and the Fylde College's Accommodation Officer that the accommodation is needed and would be added to the College's Accredited Register of accommodation. This requirement is included to reduce the risk of surplus student accommodation being used in the future as general HMO accommodation.

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6.8 The use of former holiday accommodation as good quality student accommodation around the Palatine Road campus has helped to reduce the number of poorer quality holiday bed spaces in the town and has largely had a positive impact on the streetscene. However, Blackpool & the Fylde College have confirmed that there is sufficient provision of an appropriate standard for the needs of their students and currently there are no plans to expand the University Centre at Palatine Road which would lead to a significant increase in demand for additional student accommodation.

6.9 Blackpool already has a significant oversupply of HMO and small, poor quality accommodation ([Fylde Coast Strategic Housing Market Assessment 2013](#)<sup>5</sup>) which attracts low income and vulnerable households with chaotic lifestyles and social problems and has led to high levels of deprivation, crime, anti-social behaviour and unstable, fragmented and transient communities. HMO type accommodation which isn't occupied by students can be damaging to existing holiday accommodation, businesses and residential neighbourhoods as well as increasing demands on services which are already over-stretched. As such, it is important that the supply of student HMO/bedsit type accommodation does not exceed demand and the Council considers that the demonstration of the need for further student accommodation is justified.

The sequential approach for student accommodation

6.10 In terms of the location of student accommodation, locational guidance for conversions and new build student accommodation for the Palatine Campus is set out in the Student Advice Note. Much of the existing development around the campus, particularly to the north and west, comprises larger former holiday accommodation and HMOs. Converting these larger properties would be more efficient and would safeguard family sized accommodation further afield. The Advice Note sets out aspirations for the area around the campus to become a student village for the benefit of the students themselves and to strengthen the identity of the college and promoting higher education in Blackpool.

6.11 The sequential test for student accommodation would involve the developer looking for existing student accommodation or properties that would be suitable for use as student accommodation, within 800m of the learning centre. Most students residing in student accommodation don't have access to a car. Furthermore, the Palatine Campus attracts students from across the UK and internationally and focuses on the Arts. Students often have to carry bulky work or heavy equipment between their accommodation and the

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College so wouldn't be able to cycle to college routinely. Therefore, it is reasonable to assume that the majority of student will walk to college.

6.12 The area immediately around the campus is within easy walking distance of the town centre and local amenities but there are no bus services which stop at the campus and accessibility to the wider bus network from the campus is relatively poor. Thus student accommodation within easy walking distance of the campus is preferable.

6.13 The Chartered Institute for Highways and Transportation offers guidance on walking distances and sets out that 400m distance is desirable, 800m is acceptable and 1200m is the preferred maximum walking distance. As such, an 800m walking distance is considered to be reasonable.

6.14 Therefore, only if there are no sequentially preferable properties within 800m of the campus, should properties further away be considered for student accommodation. In those instances, only properties that are on a public transport route which includes Whitegate Drive, Park Road or Central Drive, would be considered appropriate.

6.15 DM4 b. requires student accommodation to be within 800m of the relevant learning centre, and is therefore sufficiently flexible should a demand arise for student accommodation at learning centres other than the Palatine Road Campus. In terms of how the 800m would be measured, as 800m in this instance is a walking distance, 800m should be measured as the most direct and safe walking route, avoiding back alleys.

6.16 The Council considers that the requirement for student accommodation to be located within 800 metres of the relevant learning centre or in accordance with a sequential approach is justified.

**7. Are the limitations to residential conversions and sub-division set out in Policy DM5 underpinned by local evidence and justified? Is it reasonable to say that proposals for Houses in Multiple Occupation will not be considered acceptable anywhere in the Borough?**

7.1 The limitations to residential conversion and sub-division within the Inner Area as set out Part 2 of DM5 are fully justified and underpinned by local evidence. Blackpool's Inner Area is characterised by a significant oversupply of poor quality one person accommodation

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in the form of HMOs, bedsits and small flats ([Fylde Coast Strategic Housing Market Assessment 2013](#)<sup>6</sup>). It is also highlighted in the [Core Strategy Spatial Portrait](#) (Paragraphs 2.17-2.22).

7.2 This concentration of small, poor quality housing in the Inner Area has resulted in an extremely dysfunctional and unbalanced housing supply and led to a wide variety of social problems including high levels of crime, anti-social behaviour and unstable, fragmented communities with high levels of transience. The Inner Area of Blackpool presents one of the most testing social and economic challenges in the country. It is therefore vitally important that any new conversion that comes forward is of a high quality and proved a good standard of residential accommodation, particularly within the Inner Area. This approach aligns with adopted Core Strategy Policy CS12: Sustainable Neighbourhoods states that *'in order to secure a better quality of life for residents and to deliver sustainable neighbourhoods, the Council will support development and investment which:*

*a. Provides high quality housing with an appropriate mix of types and tenures to meet the needs and aspirations of existing and future residents and assists with rebalancing the housing market..'*

7.3 HMOs represent a poor standard of residential accommodation in Blackpool which greatly contributes to the issues identified in above and also within the Core Strategy Spatial Portrait. The majority of this building stock is poor quality and in need of investment and renewal. This type of accommodation is unsuitable for families and undesirable to anyone who can afford to choose better. Due to the existing predominance of HMOs and the key objectives of the overall housing strategy to rebalance the housing market in Blackpool, it is considered to be a reasonable approach that any new proposals for HMOs across the Borough will be resisted other than in exceptional circumstances.

**8. Is Policy DM6 consistent with national policy, particularly paragraph 86 of the NPPF? Is it clear how a developer is expected to respond to it? Are the locations specified justified?**

8.1 Paragraph 86(f) of NPPF21 states that planning policies should *'recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites'*. Policy DM6: Residential Uses in the Town Centre recognises Residential use can make an important contribution to the

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vitality and viability of a town centre, increasing footfall rates throughout the day and into the evening providing a walking catchment that can help sustain the town's retail, commercial and leisure offer more effectively. The policy encourages residential in appropriate locations as set out in the policy.

8.2 The policy clearly sets out that upper floor residential use will be supported within the defined Town Centre. It also specifies those streets where ground floor residential uses will be supported. The streets referred to in the policy are in the periphery of the town centre and are considered the most appropriate to convert to residential, including the ground floors. This approach is further justified by the town centre health check in the Blackpool, Retail, Hotel and Leisure Study ([EB017](#)) which acknowledged that many of the retail units located towards the Cookson Street and King Street areas are limited in their commercial contribution to the town centre and suggested that consideration could be given to promoting alternative land uses such as residential.

## **Issue (xii): Are the SADMP's economy development management policies soundly based?**

### Questions:

#### **1. Does the detailed wording and requirements in Policy DM9 adequately reflect the NPPF and legislation with regard to heritage assets and their significance? Should the Policy recognise Stanley Park is a grade II\* Registered Park and Garden and its significance?**

1.1 It is considered that Policy DM9: Blackpool Zoo adequately reflects the NPPF and legislation with regard to heritage assets and their significance. The Council are proposing a Main Modification ([MainMod03](#)) to include reference within the policy to Stanley Park Registered Park and Garden. This was response to a representation received by Historic England at Regulation 19 consultation stage. A Statement of Common Ground with Historic England ([EL1.004b](#)) has been prepared which confirms agreement with the proposed modification.

1.2 It should also be noted that any development at the Zoo would be considered against DM29: Stanley Park as highlighted in paragraph 3.100 of the supporting text. It would also be considered against other heritage DM policy where appropriate.

#### **2. Is Policy DM10 justified by evidence? Does the detailed wording and requirements adequately reflect the NPPF and legislation, particularly with regard to heritage assets? Does it adequately deal with the impact of new development on the promenade and seafront on specific heritage assets? Is it clear what is meant by landmark buildings and piecemeal development?**

2.1 The Promenade can be viewed as the largest outdoor recreation space in the town and very much the public face of Blackpool. It is one of the town's key leisure assets and is an important setting for a number of the towns' major heritage buildings and structures. The Promenade is also at the heart of the visitor economy in Blackpool along with the Resort Core and Town Centre. It is the focus for visitors, both day-trippers and guests staying in the resort and is a highly sustainable location for tourism investment.

2.2 Over the last decade there has been significant public sector investment on the Promenade including attractive new sea defences, public art and landscaping, an upgraded tramway and five new headlands which have created space for activities and events. The Promenade is a focal point for popular events such as the Annual Air Show, World Fireworks

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Championships, various concerts, festivals, events and rallies and of course, the Promenade is home to the world famous Blackpool Illuminations and the Lightpool Festival.

2.3 The Promenade between North and South Pier (including the Golden Mile) has an eclectic character of ice cream parlours, souvenir shops and stalls selling burgers, donuts and candy floss and this is all part of the seaside offer. Despite the public sector interventions, three decades of decline in visitor numbers has meant that parts of the Promenade have become associated with a poor quality, low-value seasonal offer which does not appeal to the 21st Century tourist market. It is therefore vitality important for the Council to continue to raise the quality of the built environment to improve all aspects of the visitor offer and people's experience on the Promenade and DM10 sets out the requirements for future development along the Promenade and seafront. The policy aligns with Goal 1, Objective 5 of the adopted Core Strategy which is to *'Create well-designed places for people to enjoy with high quality buildings, streets and spaces, whilst conserving and enhancing Blackpool's rich heritage and natural environment'*.

2.4 It is considered that the wording and requirements of policy DM10 adequately reflects the NPPF and legislation, particularly with regard to heritage assets and adequately deals with the impact of new development on the promenade and seafront on specific heritage assets.

2.5 Point 1e of the policy requires development on the Promenade and Seafront to conserve, enhance and secure sustainable futures for the town's heritage assets. A main modification (MainMod04) ([EL1002b](#)) is proposed to ensure the wording of the policy aligns with NPPF with respect to the Piers which are heritage assets at Point 4 of the policy. This issue was raised by Historic England at Regulation 19 consultation stage. Through the Statement of Common Ground with Historic England ([EL1.004b](#)) this proposed modification has been accepted.

2.6 Furthermore, it should also be noted that any planning application in this location would be considered against the heritage development management policies (DM26-DM28) and Core Strategy Policy CS8: Heritage where appropriate.

2.7 With respect to the meaning of 'landmark buildings', a foot note is now proposed as a main modification ([MainMod05](#)) ([EL1002b](#)) to further explain what is meant by landmark feature. This issue was raised by Historic England at Regulation 19 consultation stage. Through the Statement of Common Ground with Historic England ([EL1.004b](#)) this propose modification has been accepted.



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2.8 With respect to 'piecemeal development' which the Oxford Dictionary defines as "in an unsystematic way, through partial measures taken over a period of time", it is not considered necessary to provide dictionary definitions for specific words in the local plan. This issue was raised by Historic England at Regulation 19 consultation stage. Through the Statement of Common Ground with Historic England ([EL1.004b](#)) the Council's response has been accepted.

**3. Are Policies DM11 and DM12 justified and consistent with national policy, particularly paragraphs 86 to 91 of the NPPF? Are the uses specified justified?**

3.1 Paragraph 86 of NPPF21 states Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.

3.2 At point (b) it states planning policy should define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre.

3.3 The Primary Shopping Area as defined on the policies map comprises of Primary and Secondary frontages which are covered by policies DM11 and DM12. The approach is therefore consistent with national policy.

3.4 The Blackpool, Retail, Hotel and Leisure Study ([EB017](#)) is the evidence base which justifies the approach taken in DM11 and DM12. The recommendation to identify the Primary and Secondary Frontages and specify appropriate uses can be found in Section 10.10 - Policy Recommendations: Defined Centre Boundaries.

**4. Are the area and linear concentration limitations for betting shops, adult gaming centres and pawnbrokers set out in Policy DM13 clearly explained and justified? How would 400 metres be measured?**

4.1 The justification for the approach taken in Policy DM13 is set out in the Betting Shops, Adult Gaming Centres and Pawnbrokers Topic Paper (2020) ([EB010](#)). It is considered that the sufficient explanation is found in the policy at 2c.

4.2 With respect to area concentrations, the 400m is to be measured as the crow flies as the policy deals with the spatial distribution of the identified uses and geographical concentration of uses within an area. The Council's approach to establishing area concentrations applying the 400m rule measured as the crow flies has recently been

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supported at appeal by the Planning Inspectorate (Appeal Ref. APP/J2373/W/20/3259559<sup>7</sup>). For clarity, the Council are happy to accept a modification that explains this in the supporting text.

**5. Is Policy DM14 justified, effective and consistent with national policy, particularly paragraphs 86 to 91 of the NPPF?**

5.1 It is considered that DM14 justified, effective and consistent with national policy, particularly paragraphs 86 to 91 of the NPPF.

5.2 Paragraph 86 sets of NPPF21 sets out that planning policies should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Blackpool's district and local centres play an important role in providing shopping facilities and other services to the communities they serve. This also is recognised in Policy CS4 of the Core Strategy which provides the overarching retail policy for the Borough and sets out the Council's objectives to sustain and enhance the vitality and viability of its centres.

5.3 Paragraph 86 goes on to state planning policies should:

*(a) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;*

5.4 The policy aligns with the above as it defines the Local and District Centres and makes clear the range of uses permitted in those centres. The policy is underpinned by the Local Centres Assessment ([EB016](#)) and the Blackpool Retail, Leisure and Hotel Study (2018) ([EB017](#)) (Section 10.10) which provide the justification for the approach taken.

**6. Are the thresholds for Impact Assessment in Policy DM15 justified?**

6.1 The justification for the Threshold for Impact Assessment is set out in the Blackpool Retail, Leisure and Hotel Study (2018) ([EB017](#)) at Section 10.11.

**7. Is Policy DM16 underpinned by robust evidence? Is the evidence specific to Blackpool? Is there a clear link between obesity and takeaways? Is it clear how 400 metres and 15% will be assessed? Overall is this policy soundly based?**

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<sup>7</sup> Submitted to the examination library

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7.1 The NPPF21 requires that new development contributes to 'sustainable development'. It defines sustainable development in terms of economic, social and environmental dimensions. It supports 'strong, vibrant and healthy communities' (para 8), and confirms that policies should ensure developments create places that are safe, inclusive, accessible and which promote health and well-being, with a high standard of amenity for existing and future users (para 130).

7.2 Part 8 of the NPPF requires planning policies to achieve healthy places which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs, for example through the provision of access to healthier food.

7.3 NPPG states local plans should promote health and support a reduction in health inequalities and should consider local health and wellbeing strategies ([Healthy and safe communities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/healthy-and-safe-communities)). NPPG also states that planning can create a healthier food environment through supporting opportunities for communities to access a wide range of healthier food production and consumption choices and where justified, seek to limit the proliferation of particular uses where evidence demonstrates this is appropriate. ([Healthy and safe communities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/healthy-and-safe-communities) Paragraph: 004 Reference ID:53-004-20190722)

7.4 The Spatial Portrait of Blackpool in the Blackpool Local Plan Part 1: [Core Strategy \(summarised on page 18\)](#) describes the key social issues that the town faces, including:

- Intensely urban, densely populated with a high concentration of acute deprivation
- Extreme health, social and economic inequalities
- High unemployment and low, seasonal wages
- Low educational attainment
- Unbalanced housing market characterised by an oversupply of poor quality accommodation, unsuitable for family occupation
- Small, poor quality accommodation in the Inner Area attracting low income and vulnerable households, leading to crime, anti-social behaviour and unstable fragmented and highly transient communities.

7.5 A range of policies in the Core Strategy support the improving health agenda by, for example, regenerating the Inner Area, improving housing, promoting and enabling cycling and walking, safeguarding and requiring green infrastructure from new development and improving public realm and the quality of the built environment. Policy CS12 supports development which creates a healthy, safe, secure and attractive environment and public realm. Policy CS15 acknowledges that improving the health of Blackpool's population is a

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major challenge, with the gap in health inequalities between Blackpool and the rest of the UK continuing to widen, and that there is a strong relationship between social and economic factors such as low income and poor quality housing, with the state of health and levels of educational attainment in local communities. CS15 supports development that encourages healthy and active lifestyles and addresses the Council's health priorities.

7.6 The Council works closely with Public Health on a range of initiatives and strategies to promote healthy weight and combat poor health more generally in Blackpool.

Evidence specific to Blackpool

7.7 The evidence set out in the [Managing the Location of Hot Food Takeaways Topic Paper](#) (document EB009) was drafted in full consultation and collaboration with Public Health.

7.8 The Introduction in the Topic Paper (Section 1 pages 4 – 7) sets out the problems with obesity nationally and the Background section (Section 2 pages 8 – 10) talks more broadly about different studies that have been undertaken, which explore the links between the built environment and health. The Marmot Review 2010 in particular talks about a requirement for policies which limit the number of hot food takeaway outlets in a Super Output Area as a tool for improving health.

7.9 Blackpool's Joint Health and Well Being Strategy 2016-2019 also calls for planning policy to assist in achieving healthy weight.

7.10 In January 2016, Blackpool Council became one of the first authorities in the country to sign up to a healthy weight declaration which includes a commitment to consider planning policies restricting hot food takeaways. The Methodology section in the Topic Paper (Section 4 pages 15 – 16) explains how the evidence was collected and justifies discounting hot food takeaways on the Promenade who primarily serve the tourism industry and just focuses on hot food takeaways away from the Promenade. The methodology explains how the deprivation and childhood obesity data was collated.

7.11 The Obesity and Health section in the Topic Paper (Section 5 pages 16 – 18) compares life expectancy and childhood obesity levels in the UK and Blackpool (life expectancy in Blackpool is 14.3 years lower for men and 9.3 years lower for women than the UK average and children are much heavier than the national average). Since the Topic Paper was written, Public Health England published the [Local Authority Health Profile](#) in 2020

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which indicates that life expectancy for men is currently 12.3 years lower and for women, is 10.1 years lower than the national average and provides a up to date health summary for Blackpool.

The link between obesity and takeaways

7.12 The Obesity, Deprivation and Hot Food Takeaways section in the Topic Paper ([EB009](#)) (Section 6 pages 18 – 25) identifies a direct correlation between obesity, deprivation and high numbers of hot food takeaways in Blackpool. This section confirms that Public Health England have identified that in England, there are on average 96.1 hot food takeaways per 100,000 head of population. This section of the Topic Paper confirms that in some of the most deprived wards in Blackpool, with some of the heaviest children, there are significantly more hot food takeaways per 100,000 head of population, excluding those hot food takeaways on the Promenade. For example, in Talbot Ward, there are 52 hot food takeaways which equates to 804.83 per 100,000, there are 48 hot food takeaways in Bloomfield Ward which equates to 715.14 per 100,000. 12 out of 21 wards have significantly (more than 10%) more hot food takeaways than the national average.

7.13 The Local Strategies to Improve Health section in the Topic Paper (Section 7 pages 25 – 26) outlines other Council and Public Health strategies to improve health.

7.14 Sections 8 and 9 of the Topic Paper (pages 26 – 30) looks at what other authorities have done to control the proliferation of hot food takeaways in areas where they are causing harm, and looks at appeal decisions in other authorities where planning applications for hot food takeaways have been refused on health grounds.

7.15 As such, the Council considers that Policy DM16 is underpinned by robust evidence that is specific to Blackpool and that the Topic Paper identifies a direct link between obesity and takeaways.

7.16 In terms of how 400 metres will be assessed, the Topic Paper (paragraph 10.9) makes an assessment of appeal decisions and confirms that Inspectors have supported a 400m walking route rather than an 'as the crow flies' approach. It is considered therefore, that a 400m walking route should be used. Lancashire County Council has produced a [Hot Food Takeaways and Spatial Planning Public Health Advisory Note](#) which recommends that authorities in Lancashire adopt a 400m hot food takeaway exclusion zone around schools. A similar approach has been taken by [Manchester](#) City Council and [City](#) of Bradford through Supplementary Planning Guidance in line with NPPG ([Healthy and safe communities - GOV.UK \(www.gov.uk\)](#) Paragraph: 004 Reference ID:53-004-20190722) which states –

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*'Planning policies and supplementary planning documents can, where justified, seek to limit the proliferation of particular uses where evidence demonstrates this is appropriate (and where such uses require planning permission).'*

7.17 In terms of how 15% of year 6 and 10% of reception pupils with obesity will be assessed, Public Health update map based records online at [Local Health - Public Health England](#) (click on indicators which opens a map of the UK, navigate to the relevant ward, click edit reports, click reports workspace, click Children's Weight NCMP (National Child Measurement Program) and this provides the most up to date NCMP data for that ward). This data is updated annually and so provides the most up to date information available. A link is included in the footnote to Policy DM16 on page 57 of the SADMP. The Council considers that using the most up to date data in this way, means that Policy DM16 is responsive to the changing levels of childhood obesity in Blackpool.

7.18 It is acknowledged that Policy DM16 alone will not solve the problem of childhood obesity or improve the overall health of the population in Blackpool. However, it would form just one of many tools in planning policy and other Council and Public Health strategies which are designed to reduce the health inequalities experienced by Blackpool's population.

7.19 The Council considers that Policy DM16 provides an appropriate strategy which seeks to address an identified problem, has a robust evidence base, is consistent with national policy and is soundly based.

7.20 With respect to this matter, we would respectfully like to draw attention to the approach taken in the [Hartlepool](#) and [Doncaster](#) Local Plans where the Inspector<sup>8</sup> found that, like Blackpool, there was a particular set of health issues and a co-ordinated strategy of action between public health and planning to justify the inclusion of such a policy.

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<sup>8</sup> [Inspector's Report on the Hartlepool Local Plan – April 2018](#)  
[Inspector's Report on the Doncaster Local Plan – June 2021](#)

## **Issue (xiii): Are the SADMP's design development management policies soundly based?**

### Questions:

#### **1. Is the requirement in Policy DM17 for not less than four storeys high on the Promenade or in the Town Centre justified? Does the policy apply to development such as holidays parks?**

1.1 Paragraph 124 of the NPPF confirms that planning policies should support development that makes efficient use of land. Paragraph 125 states that plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport.

1.2 The requirement for buildings on the Promenade and the Resort Core to be four stories in height has been carried forward from Saved Policy LQ4: Building Design in the 2006 Local Plan.

1.3 An historical pattern of piecemeal development means that buildings built at an inappropriate scale for their location are commonplace in Blackpool, parts of the Town Centre and the Promenade being prominent examples. There are many examples of poor quality, single and two storey buildings on the Promenade and this is considered to be an inefficient use of the land in a prime location.

1.4 In design terms, the height of buildings should relate to the width and function of the street or space they front. Larger scale buildings are more appropriate on wider streets such as the Promenade. The important function of the Town Centre should be emphasised by a larger scale than other parts of the town.

1.5 Buildings of four or more storeys provide this emphasis, with the additional space in the upper floors promoting opportunities for a mix of uses, particularly offices and residential, which are currently under represented on much of the Promenade and in the Town Centre.

1.6 The requirement for four storey scaled development will apply to all development in the Town Centre and Promenade unless the character of the site and its surroundings suggests that four storeys would be inappropriate. There are no current opportunities to

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provide a holiday park on the Promenade or in the Town Centre as both are already built up with no notable areas of open land for such development. However, if the pattern and scale of development in the area was single storey, a use such as a holiday park which would also predominantly be single storey, would meet the requirements of Policy DM17

1.7 Given the need to regenerate large parts of the Town Centre and the Promenade, it is important that new development in these locations are appropriately scaled and makes the most efficient use of land.

1.8 As such, the Council considers that the requirement in Policy DM17 for development of not less than four storeys high on the Promenade or in the Town Centre is justified, provides certainty to developers and would be consistent with national policy in terms of achieving appropriate densities of development. The Council considers that Policy DM17 is soundly based.

**2. Is the requirement for a broadband statement set out in Policy DM18 necessary and justified? Is it reasonable to expect developers to make provision for full fibre broadband? Have these requirements been appropriately considered in the Council's viability assessment?**

2.1 Access to full fibre broadband is vital in today's world. It is intrinsic to growing a sustainable local economy, vital for education and home working and increases community cohesion through digital communication.

2.2 Paragraph 114 of NPPF21 identifies that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. It states that planning policies should support the expansion of electronic communications networks, including **full fibre broadband connections** and **prioritise full fibre connections to existing and new developments** (as these connections will, in almost all cases, provide the optimum solution).

2.3 It should be noted that the policy requires developer to provide future occupiers with **potential** for full fibre broadband. This would consist of ducting to the property and not the actual broadband infrastructure which is considered a reasonable approach. It is not considered to be unreasonable to require developers to submit a broadband statement to ensure that full consideration has been given to the provision of full fibre infrastructure.



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2.4 With respect to the viability assessment, the Council appointed Lambert Smith Hampton (LSH), a suitably qualified and experienced consultancy, in June 2019 to advise on and prepare a Local Plan Viability Assessment ('LPVA') ([EB002](#)) to undertake an economic viability assessment of the emerging SADMP in conjunction with adopted policy set out in the Blackpool Local Plan Part 1: Core Strategy and guidance set out in adopted SPD's.

2.5 LSH reviewed the adopted Core Strategy and the emerging Site Allocations and Development Management Policies to identify whether adopted and emerging policies will have a direct, indirect or no impact on development viability. The viability impact matrix is included at Appendix 1 to the viability assessment ([EB002](#)). At paragraph 3.9 of the viability assessment LSH determined which policies in the SADMP will have a direct viability impact and listed 5 policies which did not include DM18. At paragraph 3.10, LSH state that a number of these policy requirements are long standing obligations of the planning system (i.e. design and development quality, landscaping and transport requirements) and the costs associated will be factored into existing development costs. In light of LSH's findings they recommended amendments to several aspects of policy, but did not propose any specific amendments to Policy DM18.

**3. Is Policy DM19 supported by robust evidence? Is this policy consistent with national policies and legislation with regard to heritage assets? Is it clear what is meant by strategic views? Is it clear how a building would be considered to provide a landmark?**

3.1 A strategic view includes significant or landmark buildings and landscapes that contribute to defining a sense of place at a strategic level. In Blackpool, views of the Tower along the seafront and from the piers and on approach from main transport corridors leading into the Town Centre are considered to be strategic views. Views into and within conservation areas, of listed and locally listed buildings and other landmark buildings which assist with wayfinding are also considered to be views of strategic importance that should be safeguarded and enhanced.

3.2 Paragraph 190 of the NPPF21 states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, taking account of the desirability of sustaining and enhancing the significance of heritage assets. Paragraph 199 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).

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3.3 Paragraph 206 of the NPPF21 talks about new development in Conservation Areas which enhances and better reveal their significance. Local plans should seek opportunities to conserve and where appropriate enhance the significance of heritage assets and the contribution of their settings.

3.4 Saved Policy LQ7 – Strategic Views in the 2006 Local Plan has served to protect strategic views of the Tower, the seafront and coastline, into and within Conservations Areas and local views of listed buildings over the last plan period. The Council consider it necessary to take this long standing planning policy forward into the SADMP.

3.5 The Council adopted a [Built Heritage Strategy \(EB028\)](#) in 2016 which was informed by the [Blackpool Heritage Characterisation Study 2009 \(EB029\)](#). The Characterisation Study assesses the architectural and historic character of the buildings of Central Promenade, Layton, Town Centre, South Beach, Raikes, North Shore, North Promenade and Bloomfield.

3.6 The Characterisation Studies have informed the local list and resulted in four additional conservation areas and the Council are currently consulting on the designation of a conservation area in Layton. The studies have informed policies in the Core Strategy and emerging policies in the SADMP. Whilst the assessments are 12 years old, the townscape has changed very little in that time.

3.7 Core Strategy Policy CS8 supports proposals that enhance the setting and views of heritage assets and strengthens the existing townscape character created by historic buildings. Policy CS7 requires that development is well designed, enhances the character and appearance of the local area and should be appropriate in terms of scale, mass, height, layout and density, appearance, materials and relationship to adjoining buildings. However, CS7 only deals with the immediate setting of development and the character and appearance of the local area.

3.8 Blackpool Tower is an iconic Grade I listed building of exceptional interest and historical importance. It is a nationally recognised landmark that dominates the skyline and can be seen from miles around. The seafront and coastline serves as the setting of Tower and is the shopfront and main focal point for Blackpool as a holiday resort.

3.9 As such, it is considered necessary to ensure that strategic views of the Tower and its seafront setting are protected and enhanced.

3.10 The requirement to protect and enhance the historic environment is a long standing objective on the planning system and a key component of sustainable development. As

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such, it is considered necessary to protect strategic views of the Blackpool's historic environment.

3.11 Policy DM19 supports the Core Strategy Policy CS8 and SADMP heritage policies DM26, DM27 and DM28 which seek to conserve and enhance the historic environment in Blackpool.

3.12 Along with other policies in the Core Strategy and SADMP, Policy DM19 forms part of a positive strategy for the conservation and enjoyment of the historic environment, taking account of the desirability of sustaining and enhancing the significance of heritage assets in accordance with paragraph 190 of the NPPF21. The policy will enable the council to meet their regeneration agenda in a way which sensitively integrates new development into the existing urban fabric.

3.13 The Council considers that Policy DM19 is consistent with national policies and legislation with regard to heritage assets.

3.14 A landmark building forms a prominent, recognisable and well known feature in the streetscene which can be used to assist in wayfinding. They can quite often be listed or locally listed buildings, but not always. For example, municipal buildings such as libraries and community hubs can form landmark buildings, as could a large well designed public house. In order to assist navigation around the town and to retain a sense of place, it is important that views of such buildings are also protected and enhanced by Policy DM19.

**4. Is Policy DM21 soundly based? Should criteria (e) form part of the Policy or its explanatory text?**

4.1 The protection and improvement of the natural environment is one of the core objectives of the planning system. The NPPF21 confirms that good quality landscaping and green infrastructure can create visually attractive places with multiple benefits to the economy, the environment and health and can avoid increased vulnerability to the range of impacts arising from climate change.

4.2 The NPPF21 requires that new development contributes to 'sustainable development'. It defines sustainable development in terms of economic, social and environmental dimensions. It supports 'strong, vibrant and healthy communities' and seeks to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising

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waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy (para 8). The NPPF21 confirms that policies should ensure developments create places that are safe, inclusive, accessible and which promote health and well-being, with a high standard of amenity for existing and future users (paragraph 130).

4.3 Paragraph 174 of the NPPF21 states that planning policies and decisions should contribute to and enhance the natural and local environment by recognising the wider benefits from natural capital and ecosystem services – including the economic and other benefits of trees and woodland. Planning policies should minimise impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

4.4 Paragraph 131 confirms that trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.

4.5 Another relevant policy document is the National Design Guide (January 2021). The National Design Guide recognises the importance of good design and identifies the ten characteristics that make up good design to achieve high-quality places and buildings. The guide articulates that a well-designed place is made up of its character, its contribution to a sense of community, and its ability to address the environmental issues affecting climate.

4.6 The Spatial Portrait of Blackpool in the Blackpool Local Plan Part 1: [Core Strategy \(summarised on page 18\)](#) describes the key social issues that the town faces, including:

- Intensely urban, densely populated with a high concentration of acute deprivation
- Extreme health, social and economic inequalities
- High unemployment and low, seasonal wages
- Low educational attainment
- Unbalanced housing market characterised by an oversupply of poor quality accommodation, unsuitable for family occupation
- Small, poor quality accommodation in the Inner Area attracting low income and vulnerable households, leading to crime, anti-social behaviour and unstable fragmented and highly transient communities.

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4.7 A range of policies in the Core Strategy support the improving health agenda by, for example, regenerating the Inner Area, improving housing, promoting and enabling cycling and walking, safeguarding and requiring green infrastructure from new development, improving public realm and the quality of the built environment. Policy CS12 supports development which creates a healthy, safe, secure and attractive environment and public realm. Policy CS15 acknowledges that improving the health of Blackpool's population is a major challenge, with the gap in health inequalities between Blackpool and the rest of the UK continuing to widen, and that there is a strong relationship between social and economic factors such as low income and poor quality housing, with the state of health and levels of educational attainment in local communities. CS15 supports development that encourages healthy and active lifestyles and addresses the Council's health priorities. The Council works closely with Public Health on a range of initiatives and strategies to promote healthy weight and combat poor health more generally in Blackpool.

4.8 Core Strategy Policy CS6 requires development to incorporate or enhance green infrastructure and where this is not possible, a financial contribution will be sought to make appropriate provision for open space and green infrastructure off-site. CS6 confirms that measures that seek to preserve, restore and enhance local ecological networks and priority habitats/species will be required where necessary. The supporting text provides the context to the Policy and highlights the challenge of creating new green spaces in Blackpool due to the dense urban nature, and the historic street pattern of the Inner Areas.

4.9 The [Open Space Assessment 2019](#) (document EB022) identifies that much of the Inner Area in Blackpool has little or no green infrastructure and the people's needs for green infrastructure are not being met.

4.10 Blackpool Council also declared a Climate Emergency in 2019 and adopted a Green and Blue Infrastructure Strategy which sets out six objectives for Blackpool in terms of green infrastructure:

- Protect and Enhance GBI i.e. protecting the best and enhancing the rest
- Create and Restore GBI i.e. greening the grey and creating new GBI in areas where it is most needed
- Connect and Link GBI i.e. making the links, improving connectivity and accessibility of GBI
- Promote GBI i.e. changing behaviour, promoting the benefits of GBI and encouraging greater uptake of outdoor activity and volunteering

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4.11 The Council will be leading on implementing the Green and Blue Infrastructure Strategy and Action Plan and a Tree Strategy for Council owned trees. However, given the lack of green infrastructure in Blackpool and the impact that it is having on the health of the local population, the negative impacts on biodiversity and lack of resilience in the face of the changing climate, it is imperative that green infrastructure is retained and enhanced in new development and that development contributes new green infrastructure in order to meet the economic, social and environmental tests of sustainable development.

4.12 The Council considers that Policy DM21 is positively prepared in that it contributes to the implementation of Core Strategy Policy CS6, the Green and Blue Infrastructure Strategy and Action Plan and will assist in combating climate change. The policy provides certainty to developers and is justified by evidence, is consistent with national policy and the Council considers that Policy DM21 is soundly based.

4.13 It is considered that criteria (e) of policy DM21 should be included in the policy wording rather than in the supporting text to ensure it is given the weight that is needed to secure tree planting in the town. It should be noted that the policy wording is flexible and enables the developer to meet their tree planting requirements off site should the site not be suitable for tree planting (for example, because of airport safeguarding and bird strike concerns or unsuitable ground conditions).

**5. Are Policies DM22 and DM23 soundly based? Are the requirements too onerous? Is Policy DM22 unnecessarily overly restrictive of signage?**

5.1 Section 12 of the NPPF21 states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. Paragraph 127 states that Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable.

5.2 Core Strategy Policy CS7 requires new development in Blackpool to be well designed and enhance the character and appearance of the local area.

5.3 Policy DM22: Shopfronts sets out the design principles for new shopfronts and Policy DM23 seeks to address the blight that solid roller shutters are having on the quality of the

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built environment. The design of modern shopfronts quite often does not respect the design of the building as a whole, and can include large areas of glazing, bulky frames, excessively deep fascia's and poor quality materials. A shopfront should be well integrated into the building that it is part of. It should respect the period and style of the building. It should not attempt to divorce the ground floor from the rest of the building or over emphasise the fascia. This can often occur if a deep fascia is used.

5.4 There is a need to improve the built environment in Blackpool and shopfronts can play a significant role in improving the towns' streets and spaces. Blackpool has a legacy of advertisement clutter, poorly designed plastic shopfronts and in some cases, shops don't have shopfronts at all, just roller shutters over void.

5.5 Roller shutters provide a dead frontage when closed and this is a significant problem in some areas of Blackpool where shops are no longer trading and the shutters are down permanently. This has a knock on effect to other nearby businesses as the area effectively looks closed for business. Solid roller shutters are only normally appropriate on industrial buildings, which is the purpose for which what they were originally designed.

5.6 In terms of signage, again, the poor quality shopfronts in Blackpool are quite often cluttered with poor quality signage, excessive fascia's, multiple layers of fascia signage, signage on roller shutter housing boxes, windows covered in poor quality vinyls etc which removes active frontages and animation at street level. Advertisement clutter does not create a pleasant and welcoming built environment.

5.7 The Council is striving to improve the quality of Blackpool's shopping streets, to attract investment and improve the quality of the shopping environment for Blackpool's residents and visitors. For example, there is an ongoing program of grant funding for new shopfronts in areas of the Town Centre under the [Quality Corridors scheme](#). The Quality Corridors scheme involves new quality surfaces, new street trees, public art and encourages shop owners to replace their shopfronts with high quality painted timber shopfronts with traditional, good quality design features.

5.8 In accordance with paragraph 126 of the NPPF which sets out that design expectations and how these will be tested, is essential for achieving good design, and paragraph 127 which requires a plan to set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable, Policies DM22 and DM23 sets out detailed design requirements for new shopfronts and security measures in an effort to raise the quality of the streets and spaces in Blackpool.

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5.9 As such, the Council considers that Policies DM22 and DM23 are soundly based and that the requirements of the policies are not unreasonable, too onerous or overly restrictive.

**6. Is Policy DM24 consistent with national policy and legislation? Is it justified by evidence?**

6.1 Section 12 of the NPPF21 states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. Paragraph 127 states that Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable.

6.2 Paragraph 136 of the NPPF acknowledges that the quality and character of places can suffer when advertisements are poorly sited and designed and sets out that advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

6.3 Core Strategy Policy CS7 requires new development in Blackpool to be well designed and enhance the character and appearance of the local area.

6.4 There is a need to improve the built environment in Blackpool and good quality, appropriately sited advertisements can play a significant role in improving the towns' streets and spaces. Blackpool has a legacy of advertisement clutter on poor quality shopfronts and on other buildings and in order to redress this, it is important that clear design expectations are set out in policy.

6.5 There is a clear commitment in the Core Strategy to arrest decline and restore confidence in the town centre and to regenerate its centres. This includes securing positive improvements in the quality of the built, natural and historic environment and replacing poor design with better design. One of the key themes of the Local Plan is creating and maintaining attractive, distinctive places which encompass issues of heritage, local identity, new design, public places and other issues relating to the quality of Blackpool's environment. As such, the Council considers that Policy DM21 is justified by local evidence and that Policy DM24 is consistent with paragraph 136 of the NPPF.



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6.6 In terms of the legislation, The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended) set out different categories, or classes of advertisements and identifies certain advertisements as having deemed consent (subject to the standard conditions). Where the Regulations do not state that an advertisement has deemed consent, express consent is required from the Local Authority.

6.7 Policy DM24 seeks to control advertisements which require express consent, in the interests of amenity and public safety and therefore the Council considers that the policy is consistent with the Regulations.

**7. Is Policy DM25 justified? Have its requirements been taken into account in the Council's viability assessment?**

7.1 It is considered that DM25: Public Art is justified and aligns with NPPF21, NPPG, the National Design Guide and the adopted Blackpool Local plan Part 1: Core Strategy.

7.2 Public Art can improve the visual and cultural richness of the environment and contribute socially to health, education and community development; economically by increasing the attractiveness of a place to live, work and invest; and environmentally enhancing the design of and access to buildings and public realm through the structural fabric, infrastructure design, landscape and environmental management.

7.3 Section 12 of NPPF21 relates to 'Achieving Well Designed Places' and paragraph 126 goes on to state '*The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.*' The [National Design Guide](#) sets out the characteristics of well-designed places and demonstrates what good design means in practice. At paragraphs 99 and 100 the Guide emphasises the importance of attractive well designed public spaces and the inclusion of, amongst other elements, public art.

7.4 In addition public art contributes to the cultural well-being of places which is part of the social role of the planning system and one of three overarching objectives which are interdependent in achieving sustainable development. NPPF at paragraph 93b also includes a requirement that developments take account of and support local strategies to improve cultural wellbeing for all, delivering sufficient community and cultural facilities and services to meet local needs.

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7.5 The Council is also committed to developing a strong sustainable cultural economy recognising the benefits this can bring in terms of skills development and better paid jobs for local people, a unique and attractive tourism offer which is at the heart of the boroughs economy and ensuring the well-being of local people. The role of public art in contributing to a sustainable cultural economy is recognised by the Council and aligns with the key priorities in the [Council Plan](#)<sup>9</sup>:

- The economy: Maximising growth and opportunity across Blackpool”
- “Communities: Creating stronger communities and increasing resilience”

7.6 Policy DM25 will also assist in delivering the Vision and objectives of the Blackpool Local Plan Part 1: [Core Strategy](#) (pages 23 and 24 refer). Embedded in the vision is the promotion of the quality and innovation of Blackpool’s culture; the offer of a high quality visitor experience; quality development and excellent public realm enhancements. For its communities the vision sees sustainable communities living in attractive neighbourhoods with a strong sense of civic pride. Goal 1 Objective 5 seeks to create well designed places for people to enjoy with high quality buildings, streets and spaces. Goal 2 Objective 8 seeks to develop sustainable neighbourhoods ...well connected to, amongst others, cultural facilities; and Objective 11 seeks to improve the health and well-being of Blackpool’s residents by good access to amongst other things open spaces.

7.7 The policy also aligns with Policy CS7: Quality of Design which recognises that high quality design is central to the creation of attractive, successful and sustainable places, which in turn has a positive effect on the health and well-being of the communities who live there. Points 1c and 1g of CS7 particularly refer. Paragraph 5.123 to Policy CS7 highlights that design guidance will be prepared by the Council to support this policy and work on a Public Art Supplementary Planning Document (SPD) has already commenced. The SPD will provide guidance on how public art in the context of new development proposals will be provided. The guidance will assist planners, developers and landowners to meet the Council’s proactive approach towards achieving design quality within and around new developments through the provision of public art.

7.8 In developing Policy DM25 the Council has drawn on advice provided by Ixia the national public art think tank organisation who provided the Council with support in developing the cultural well-being and development of public art in the borough. Ixia advised in aligning public art policy with Core Strategy policy in particular Policy CS1 which sets out the overarching spatial focus and strategic locations of development in the borough.

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<sup>9</sup> Submitted to the examination library

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7.9 With respect to the viability assessment. The Council appointed Lambert Smith Hampton (LSH), a suitably qualified and experienced consultancy, in June 2019 to advise on and prepare a Local Plan Viability Assessment ('LPVA') ([EB002](#)) to undertake an economic viability assessment of the emerging SADMP including the draft requirements set out in the emerging Affordable Housing Supplementary Planning Document (SPD) and Greening Blackpool SPD in conjunction with adopted policy set out in the Blackpool Local Plan Part 1: Core Strategy and guidance set out in adopted SPD's.

7.10 LSH has reviewed the adopted Core Strategy and the emerging SADMP to identify whether adopted and emerging policies will have a direct, indirect or no impact on development viability. The viability impact matrix is included at Appendix 1 to the viability assessment ([EB002](#)). At paragraph 3.9 of the viability assessment LSH determined which policies in the SADMP will have a direct viability impact and listed 5 policies which included DM25 Public Art. At paragraph 3.10, LSH state that a number of these policy requirements are long standing obligations of the planning system (i.e. design and development quality, landscaping and transport requirements) and the costs associated will be factored into existing development costs. They go on to state that other elements (i.e. public art and new policy requirements such as nationally described space standards) will have additional cost either through development or s106 contribution and will be assessed through this LPVA.

7.11 In undertaking the viability assessment of a range of sites across the borough LSH set out their conclusions and recommendations in Chapter 9 of their assessment. LSH highlight that overall the viability modelling identifies a mixed picture of viability and that this picture is not uncommon with their experience of site specific and plan-wide viability in neighbouring authorities and across the wider region. LSH go on to state at paragraph 9.6 that the available surplus is generally modest and careful consideration will be necessary to site specific viability and design requirements. In light of LSH's findings they recommend amendments to several aspects of policy in relation to targets for adopting the nationally described space standards and accessible and adaptable dwellings, but did not propose any specific amendments to Policy DM25.

7.12 It is important to highlight that the inclusion of public art within a development does not necessarily incur significant on costs. Public art is not an art form, it is a principle whereby the involvement and activities of artists can contribute to the identity, understanding, appreciation and enhancement of developments and public places. Public art encourages partnership between developers, design professionals, local communities, artists and craftspeople. Incorporating public art can add value to a development by creating distinctiveness from the competition, and can encourage positive support for the

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development from the local community where they have been involved working with an artist.

7.13 Many of the essential elements that make up a building or landscape are often suitable for artistic interpretation, and can be provided at a relatively small proportion of the overall budget, over and above that of a standard item. For example, entrances, surrounds, cladding, doors, windows, balconies, lighting, signage, gates, railings, seating and paving areas can be individually commissioned to give a development a distinctive and special identity.

7.14 In producing the Public Art SPD Blackpool Council will not be applying a rigid 'percent for art' instead the SPD will set out our approach in detail and provide clear guidance on best practice and suggested approaches for the developer to get the most from working with artists and creative design professionals on their site as well as advice on sourcing additional funding or securing 'Support in Kind' where appropriate.

7.15 Whilst viability of development may be challenging Blackpool does not stand alone in aspiring to the inclusion of public art as part of its approach to enhance the quality of design and creativity in the borough and to assist in delivering key economic, social and environmental objectives. In Blackpool negotiation with site developers is standard to agree what can be achieved on a site and these negotiations reflect specific site characteristics and surroundings and it is not considered unreasonable that the provision of public art should be included in the negotiations to set out how public art can make a contribution that benefits the site, the users the public and the town.

**8. Are Policies DM26, DM27, DM28, DM29 and DM30 consistent with national policy and legislation? Overall are they soundly based?**

8.1 The Council places great importance on preserving the historic environment. Under the Planning (Listed Buildings and Conservation Areas) Act (1990) the Council has a responsibility to have special regard to preserving listed buildings and must pay special attention to preserving or enhancing the character or appearance of conservation areas. The NPPF states that in decision making, local authorities should give great weight to conservation of designated heritage assets in a manner appropriate to their significance. The Council expects that development not only conserves, but also takes opportunities to enhance, or better reveal the significance of heritage assets and their settings. Furthermore, Policy CS8 of the Core Strategy sets out the Council's strategic policy in relation to heritage

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and recognises Blackpool's rich social and built heritage, with the town's success founded on iconic Victorian landmarks

8.2 It is considered that the Heritage DM policies are all soundly based, consistent with national policy and legislation. In considering potential impacts of development on heritage assets, the heritage DM policies align with Paragraphs 199-208 of NPPF 2021. The Heritage DM policies have been prepared with significant input from Historic England. A Statement of Common Ground with Historic England ([EL1.004b](#)) has been prepared confirming that all issues raised at Regulation 19 stage have now been dealt with and there are no outstanding concerns.

## **Issue (xiv): Are the SADMP's environment development management policies soundly based?**

### Questions:

#### **1. Is Policy DM31 consistent with Policy CS9 of the CS and national policy? Should the maximum surface water run-off rates specified in paragraph 3.286 of the SADMP be specified in the Policy?**

1.1 It is considered that DM31 is consistent with policy CS9 and national policy. It expands on Core Strategy policy CS9 (c) and (d) and was included as a response to representations made by United Utilities and the Environment Agency earlier in the SADMP process. It has been prepared with significant input from both parties.

1.2 The maximum surface water run-off rates specified in paragraph 3.286 expands Points 2 and 3 of policy DM31. For clarity, the Council are happy to accept a modification that includes this within the policy.

#### **2. Is Policy DM32 consistent with Policy CS10 of the CS and national policy? Are all the criteria effective?**

2.1 The Council considers that Policy DM32 Wind Energy is consistent with Policy CS10 of the Core Strategy and national policy.

2.2 Core Strategy ([AD004](#)) Policy CS10 sets out the Council's strategic approach to sustainable design for non-residential development and renewable and low carbon energy recognising that sustainable design and construction and the use of renewable and low carbon energy are key to achieving a reduction in carbon emissions.

2.3 Point 3 of CS10 specifically relates to the wind energy and development involving wind turbines. It states that such development will only be permitted where the site is in an area identified as suitable for wind energy development as identified in the Blackpool SADMP; and in line with the Ministerial Statement published 18<sup>th</sup> June 2015, that following consultation on such development, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has the community's backing.

2.4 Section 14 of the NPPF21 sets out government guidance in relation to meeting the challenge of climate change stating at paragraph 152 that the planning system should

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support the transition to a low carbon future including supporting renewable and low carbon energy and associated infrastructure with Plans taking a proactive approach to mitigating and adapting to climate change (paragraph 153 refers).

2.5 Paragraph 155 specifically states that plans should provide a positive strategy for energy from renewable and low carbon energy sources that maximises the potential for suitable development whilst ensuring that adverse impacts are addressed satisfactorily including cumulative impacts; consider identifying suitable areas for such development; and support community-led initiatives for renewable and low carbon energy (paragraph 156 refers). Paragraph 158 at point a) recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions and at point b) a footnote reiterates the requirement of the 18<sup>th</sup> June 2015 Ministerial Statement in relation to consultation and community backing of schemes.

2.6 Policy DM32 of the SADMP is consistent with the CS10 and NPPF in taking a positive approach to identifying the whole of the Borough as an area of search suitable for small scale wind turbines. This 'whole borough area of search' approach, which has been adopted by other authorities, has been informed in Blackpool by the evidence ([EB030](#) and [EB031](#)) and the context that 6 small scale wind have already been granted permission. It is considered that this approach positively responds to the favourable wind speeds in the borough and the constraints of a compact urban form prohibiting medium and large scale turbines.

2.7 In adopting a positive approach to small scale wind turbine development, the policy requires such development to meet, where relevant, Core Strategy and SADMP policy as well as requiring applicants to demonstrate that they have met a range of criteria, set out in the policy, which seek to ensure that all appropriate impacts have been considered and that any adverse impacts can satisfactorily be mitigated. Point 1h specifically addresses the requirement of the 2015 Ministerial Statement requiring community backing and point 4 responds to paragraph 156 of NPPF in adopting a positive approach to community-led initiatives.

2.7 It is considered in light of the above that Policy DM32 presents a reasonable and positive approach for wind energy development providing a comprehensive and effective list of criteria to be used by developers in bringing forward appropriate sustainable small scale wind turbine schemes; and by the Local Authority when making decisions; and ensuring any proposals have the backing of the local community.

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**3. Is Policy DM33 soundly based? Should it require proposals to also take account of marine plans where necessary?**

3.1 It is considered that DM33 is soundly based. Blackpool's coastline and foreshore is one of the resort's key assets, well used by both local residents and visitors. Coastlines warrant special protection as they are often sensitive to development due to their open character and the fact that they provide habitats for certain species of plants, animals and birds.

3.2 With respect to Marine Plans, the supporting text to the policy recognises that the Marine Management Organisation (MMO) are the marine planning authority for England and responsible for preparing marine plans for English in-shore and off-shore waters. It identifies where a marine plan applies. The supporting text at paragraph 3.311 states that planning applications within the Coast and Foreshore designation will also need to be considered against the North West Inshore Marine Plan. If the Inspector is minded to include this wording within the policy, the Council would be content for it to be included as a modification to the Plan.

**4. Is Policy DM34 soundly based? Does it make clear the distinction between countryside and Green Belt? Is the 33% limit on extensions and replacement dwellings in the countryside justified and consistent with national policy for planning and flood risk as expressed in the NPPF?**

4.1 It is considered that policy DM34 is soundly based. The only remaining countryside area in Blackpool is on the eastern edge of the Borough (between Newton Hall and Mythop Road). The area is predominantly in agricultural use and adjoins extensive areas of open countryside in neighbouring Fylde Borough. It forms a buffer between Staining and Blackpool and has an open character comprising fields and Biological Heritage Sites. It is important that the countryside is protected from unacceptable development that would harm its rural character. The intrinsic value and rural character of this remaining small area of countryside in Blackpool Borough needs to be protected from inappropriate development and settlement encroachment. However, certain forms of development are necessary to support rural life and maintain or enhance the rural economy.

4.2 The introductory text to policy DM34 highlights geographically where the only remaining countryside area is in Blackpool 'as identified on the policies map'. Point 1 of the policy also refers to countryside 'as shown on the policies map'. The policies map shows the



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Countryside area and Greenbelt as different shades of green. Therefore it is considered a clear distinction is made between the Countryside Area and Green Belt.

4.3 A common issue that occurs in the countryside is the demand for small rural traditional homes to be replaced by much larger modern homes. The policy therefore includes a maximum 33% increase in ground floor area for the replacement or extension of a home in the countryside. It is considered that this will ensure that such development is proportionate to the size of the original dwelling and will not unduly impact on the character of the countryside area.

4.4 It should be noted that the 33% limit on extensions and replacement dwellings aligns with the approach adopted by Fylde Council in their Local Plan (adopted 2018) as Blackpool's area of countryside forms part of a wider expanse of countryside in Fylde Borough.

4.5 In terms of planning and flood risk, a very small part of countryside area is located within identified Flood Risk Zones. It is in remote location with no built development. In the unlikely event that any development would come forward in this particular location, it would also be required to be considered against relevant flood risk policy and Environment Agency requirements.

**5. Is Policy DM35 consistent with national policy? Does it take appropriate account of best and most versatile agricultural land, trees and woodland? Does it deal appropriately with biodiversity net gain? Have the requirements of Policy DM35 been fully considered in the Council's viability assessment?**

**Is Policy DM35 consistent with national policy?**

5.1 It is considered that DM35 is consistent with paragraph 179 and 180 of the NPPF21. It identifies the Borough's nationally and locally designated sites and applies the principles set out NPPF paragraph 180 (a), (b) and (d).

**Does it take appropriate account of best and most versatile agricultural land, trees and woodland?**

5.2 At present the SADMP does not take account of best and most versatile agricultural land (BMV land). The Council has discussed this further with Natural England (NE) and through the Statement of Common Ground with NE ([EL1.004c](#)) the Council is content to accept a Main Modification to D35 include policy on BMV land.

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5.3 With respect to Ancient Woodland and Veteran Trees, there are none located within the Borough. Notwithstanding this, Paragraph 175 (c) of NPPF 2019 states 'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists' There is no requirement to repeat national policy, therefore the Council proposes no change to the SADMP. Natural England have noted and accepted this approach in the Statement of Common Ground.

**Does it deal appropriately with biodiversity net gain?**

5.4 The Council considers that Policy DM35 and wider local plan policy appropriately deals with net gain. Paragraph 179 (b) of NPPF 2021 states '*plans should pursue opportunities for securing measurable net gains for biodiversity.*' Furthermore, adopted Core Strategy Policy CS6: Green Infrastructure states '*High-quality and well connected networks of green infrastructure in Blackpool will be achieved by:*

*... b. Enhancing the quality, accessibility and functionality of green infrastructure and where possible providing net gains in biodiversity'.....*

5.5 It is considered that DM35 point 1 aligns with national and adopted Core Strategy policy with respect to biodiversity net gain.

5.6 However, it is acknowledged that a requirement for 10% biodiversity net gain will come into force after a two-year 'transition period' after the new Environment Bill for England receives royal ascent. As the review of the Core Strategy is currently underway, it is considered that the mandatory requirement for net gain in line with the Environment Bill will be established through a review of Core Strategy policy CS6: Green Infrastructure.

**Have the requirements of Policy DM35 been fully considered in the Council's viability assessment?**

5.7 With respect to the viability assessment, the Council appointed Lambert Smith Hampton (LSH), a suitably qualified and experienced consultancy, in June 2019 to advise on and prepare a Local Plan Viability Assessment ('LPVA') ([EB002](#)) to undertake an economic viability assessment of the emerging SADMP including the draft requirements set out in the emerging Affordable Housing Supplementary Planning Document (SPD) and Greening Blackpool SPD in conjunction with adopted policy set out in the Blackpool Local Plan Part 1: Core Strategy and guidance set out in adopted SPD's.

5.8 LSH has reviewed the adopted Core Strategy and the emerging Site Allocations and Development Management Policies to identify whether adopted and emerging policies will have a direct, indirect or no impact on development viability. The viability impact matrix is

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included at Appendix 1 to the viability assessment ([EB002](#)). At paragraph 3.9 of the viability assessment LSH determined which policies in the SADMP will have a direct viability impact and listed 5 policies which did not include DM35 Biodiversity. At paragraph 3.10, LSH state that a number of these policy requirements are long standing obligations of the planning system (i.e. design and development quality, landscaping and transport requirements) and the costs associated will be factored into existing development costs.

**6. Is Policy DM36 consistent with national policy, particularly paragraph 186 of the NPPF? Has the effect of proposals in the SADMP on air quality been adequately assessed? Should Air Quality Management Areas be identified in the SADMP? Is it clear when air quality impact assessment will be required? Overall is this policy soundly based?**

6.1 Paragraph 186 of the NPPF states that planning policies should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.

6.2 It is considered that Policy DM36 would sustain and contribute towards compliance with relevant limit values or national objectives for pollutants and decisions on planning application would be guided by colleagues in Environmental Protection, who review air quality to assess whether defined air quality standards and objectives are being achieved. Paragraph 186 of the NPPF states that opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications.

6.3 Strategic policies are contained within the Core Strategy which seek to, amongst other matters, combat and mitigate climate change and improve air quality. The Core Strategy Policy CS5 addresses sustainable transport at a strategic level and Policy CS6 requires the protection, enhancement, creation and connection of green infrastructure. Policy CS7 requires development to incorporate pedestrian and cycle routes and green infrastructure as an integral part of the development and CS9 requires SuDS in new development and supports retrofitting of SuDS. CS10 requires new major, non-residential development to meet BREEAM 'very good' standards, supports renewable and low carbon energy schemes and CS22 supports proposals for environmental enhancements, landscaping, extension of the network of green infrastructure and traffic calming, improved public transport, pedestrian and cycling provision along key resort gateways. Policy CS27

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requires development in south Blackpool to prioritise sustainable modes of transport between homes, job and community facilities.

6.4 Policy DM36 doesn't seek to improve air quality in the same way that a strategic policy would, but requires that development doesn't give rise to a deterioration of air quality in an Air Quality Management Area or result in a new AQMA.

6.5 Other development management policies in the SADMP which will help improve air quality include DM1 which states that the design and orientation of roof in housing development should assist the siting of solar technology and that renewable and low carbon energy generation should be explored. DM4 requires student accommodation to be located within 800m of the learning centre that it would serve and DM6 encourages residential uses on upper floors in the Town Centre, reducing car dependence and encouraging the use of sustainable transport modes. DM21 requires development to contribute to green and blue infrastructure, to retain trees and hedgerows, increase tree and shrub cover and to use green roofs and walls and other landscaping. DM31 requires the use of SuDS and DM32 is permissive of wind turbines of up to 20m, anywhere in the Borough subject to certain considerations. Policy DM37 protects community facilities, reducing the need to travel and permits new community facilities on sites accessible by sustainable modes of travel and DM38 safeguards allotments and community gardens. DM41 requires development to provide convenient, safe and pleasant pedestrian access and cycle routes and that appropriate provision is made for public transport, traffic management measures to reduce traffic speeds etc and that development incorporates electric vehicle charging infrastructure.

6.6 The strategic policies in the Core Strategy and the emerging development management policies in the SADMP, will ensure that development takes the opportunities to improve air quality in Blackpool. Policy DM36 requires mitigation measures if a development would result in, or contribute to a deterioration in air quality and any mitigating measures would be agreed following consultation with Environmental Protection. In terms of the other elements of the policy being consistent with the NPPF, chapter 15 confirms that policies should take into account land contamination and pollution, living conditions and the natural environment and require mitigation where necessary. As such, it is considered that Policy DM36 and the Local Plan as a whole would be consistent with national policy and in particular, paragraph 186.

6.7 Wyre Borough Council has included a very similarly worded policy in their [Local Plan 2011-2031](#) which was adopted in 2019 (Policy CDMP1).

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6.8 There is only one Air Quality Management Area in Blackpool around the Town Centre and that is identified on the [DEFRA website](#). The Area has not been included on the Policies Map or identified in the SADMP as the Air Quality Management Areas are subject to change and that is beyond the control of the local planning authority. However, should the Inspector propose a modification to include the Air Quality Management Area on the Policies Map, the Council would have no objection.

6.9 In terms of whether it is clear when air quality impact assessment will be required, Policy DM36 states 'Where appropriate an air quality impact assessment will be required to support development proposals' without specifying the circumstances in which such an assessment will be required. It is difficult to articulate an exhaustive list of the circumstances under which an air quality impact assessment will be required and that would be for the decision maker to decide, depending on the location, scale and character of the proposed development, in consultation with Environmental Protection. An air quality impact assessment may be required only as a consequence of impacts during construction or demolition, and/or as a result of the operation of the development, or when proposing development sensitive to poor air quality in an area with known air quality issues, or when proposing development near habitats or designated sites.

6.10 Should the Inspector consider it necessary for the Council to include a list of circumstances and development types that would require an air quality impact assessment, the Council would not object. A list could be included on the Council's [Air Quality Management Area webpage](#), or be introduced as an Advice Note to be included in the Local Plan section of the website.

6.11 In terms of whether the effect of the policies in the SADMP on air quality have been adequately assessed, the Council appointed Arcadis, a suitably qualified and experienced consultancy, to advise on and prepare a [Sustainability Appraisal Report](#) (document SD005a) of the emerging SADMP. This document was finalised in November 2020.

6.12 Arcadis has reviewed the adopted Core Strategy and the emerging Site Allocations and Development Management Policies to assess the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

6.13 A summary matrix is provided on pages 7 to 9 in Appendix C to the Sustainability Appraisal, which indicates that in terms of air quality, the policies in SADMP would have either a neutral or a positive impact on air quality. Policy DM36 and the other environmental policies are discussed in more detail on pages 63-72.

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6.14 As such, the Council considers that the effect of the policies in the SADMP on air quality have been adequately assessed.

6.15 In terms of the tests of soundness, DM36 seeks to protect public health, amenity and the environment and to ensure that development meets economic, social and environmental sustainability objectives. The consequences of not including DM36 would mean developers and decision makers would have less certainty when assessing a proposal which may have negative impacts in terms of pollution and contamination. Overall, the Council considers that Policy DM36 is soundly based.

**7. Is it clear when Policy DM37 would be applied? Are the uses that would be considered community facilities clearly explained? Overall is this policy soundly based?**

7.1 Policy DM37 would be applied to proposals that would lead to a loss of a community facility, for proposals for new community facilities and gives more specific details for proposals that would lead to the loss of a public house or a social club. The Council considers that it is clear when Policy DM37 would be applied.

7.2 Community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community, and play an important role in the development of vibrant neighbourhoods by creating a sense of place and providing opportunities for people to meet and interact socially.

7.3 Different types of community facilities include health facilities, leisure and sports facilities, schools, parks and community green infrastructure, community centres and halls, youth centres, play facilities, library services, theatres, public houses and social clubs. The list is not exhaustive and so community uses haven't been specified in DM37. However, should the Inspector propose a minor modification to specify what the Council considers to be a community use in the supporting text to the policy, the Council would have no objection.

7.4 The Council considers that the policy is sound as it will enable the decision maker to make a case base case assessment on the needs of the community in relation to the loss of existing, or the provision of new community facilities. The policy would be reasonable in that it would permit the loss of a community facility if it is no longer needed, but safeguard it if there is need it or for an alternative community use in that area.

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**8. Is Policy DM38 consistent with national policy and legislation, particularly paragraph 99 of the NPPF? Does this policy apply only to sites identified on the Policies Map?**

8.1 Policy DM38 is consistent with national policy and legislation. It aligns with Paragraph 99 of NPPF 2021 as any proposal for the loss of an allotment or community garden must demonstrate there is no need for the allotments (i.e. surplus to requirements)(Paragraph 99 (a)) or if there is a need (i.e. no surplus) compensatory provision must be made elsewhere nearby (Paragraph 99(b)).

8.2 The policy applies to sites on the Policies Map as all allotments and community garden across the Borough have been identified and mapped. This is stated in paragraph 3.347 of the supporting text. However, if the Inspector prefers reference to be within policy the Council are happy to accept a main modification.

**9. Is Policy DM39 justified and effective? Is it clear what uses will be permitted at Blackpool Victoria Hospital? What is a supporting use and how would any applications for a supporting use be assessed?**

9.1 It is considered that Policy DM39 is justified and effective. Blackpool Victoria Hospital is the main hospital facility for Blackpool and the wider Fylde Coast sub-region and provides vital medical services to the community it serves. It is therefore important that development that comes forward does not undermine the function of the hospital.

9.2 Examples of supporting uses are provided in the supporting text to the policy however it is not considered an exhaustive list is necessary. A pragmatic approach is expected to be taken with regards to applications for supporting uses.

**10. Is Policy DM40 soundly based? Is the detailed wording effective?**

10.1 It is considered that Policy DM40 is soundly based. Blackpool and the Fylde College is a key education provider in Blackpool and delivers both further and higher education courses. The Council recognises the importance of Blackpool and the Fylde College Bispham Campus as a focus for further education and also as a social and recreational centre meeting the needs of Blackpool residents. It is therefore important that the site is safeguarded for the development and improvement of facilities that support the role of the College. It is

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considered that the wording of the policy is clear in the types of development that would or would not be supported.



## **Issue (xv): Are the SADMP's transport development management policies soundly based?**

### Questions:

**1. Is Policy DM41 soundly based? Are the parking standards and electric vehicle charging point requirements in Appendix D1 justified? Are the thresholds for transport assessments and travel plans in Appendix D2 justified? Have the requirements of Policy DM41 and Appendix D1 and D2 been considered in the Council's viability assessment?**

#### **Is Policy DM41 soundly based?**

1.1 The Council considers the policy to be soundly based as it is effective and accords with the Core Strategy, the NPPF21 and national transport policy such as Gear Change (cycling) and Bus Back Better.

1.2 In particular, the policy closely aligns with Chapter 9 of the NPPF21, 'Promoting sustainable transport' with an emphasis on travel plans, transport assessments and transport statements as per National Planning Guidance.

1.3 The policy resonates with the vision in the Core Strategy regarding 'a sustainable integrated transport system' and 'promoting sustainable development has been integral to transforming Blackpool and addressing climate changes issues'. The policy is closely aligned with Core Strategy Policy CS5, in particular the elements that promote the use of walking, cycling and public transport.

1.4 The policy is inclusive, specifying the relevant needs of all affected by the development and covering all transport modes. Health and environmental impact, good accessibility and transport choice are considered vital elements, with opportunities to promote walking, cycling and public transport use prioritised so as to reduce congestion, improve road safety and maximise environmental quality. Reducing greenhouse gas emissions from transport is considered a key element (the council has declared a Climate Emergency).

#### **Are the parking standards and electric vehicle charging point requirements in Appendix D1 justified?**

1.5 The Parking Standards are largely based on the 2006 Local Plan, which in turn were based on those in the [Joint Lancashire Structure Plan \(2005\)](#). The latter was produced by Lancashire County Council, Blackburn with Darwen Borough Council and Blackpool Council in association with the 12 district councils. Locally on the Fylde Coast, Fylde Council are still using these standards. Wyre Council have adopted new maximum car parking standards

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which are largely in line with Blackpool's proposed standards. However Blackpool's car parking standards are neither maximum nor minimum but are considered by the council to be appropriate, with no rigidity as to how they should be applied, this being on a case by case basis. For example peripheral business parks which are known to have overspill car parking issues can be considered for higher levels of car parking as part of the planning process. Opportunities for more sustainable travel patterns should always be taken and where established local bus services operate, the proposed standards allow for lower levels of car parking to be applied.

1.6 Standards for mobility impaired parking (and parent/child), bicycles and motorcycles are set at minimum levels. Parking should therefore be provided at or above these standards. This is to ensure that the needs of these groups are fully catered for and accessibility for all encouraged.

1.7 The car parking standards are for guidance and will be discussed/agreed on a case by case basis. The parking levels are flexible, but applicants must demonstrate that the proposed level of parking is appropriate, for example on business parks where there have been issues with overspill parking on-street.

1.8 The right to negotiate commuted sums is included, especially if proposed levels of car and coach parking are lower than the standard and are not agreeable to the council. These commuted sums will be ring-fenced and pooled for improvements to car parking, both on-street and off-street, as close as possible to the approved development, or earmarked for improvements to public transport. Coach parking is important, because Blackpool is a tourist resort. Blackpool Council's 2019 visitor survey showed 11.1% of visitors arrived by coach, compared to 60.4% by car.

1.9 The Council declared a [Climate Emergency in 2019](#). Notwithstanding the environmental issues associated with electric vehicles (raw material extraction, transport, manufacture, distribution, particulates from tyres and brake linings, disposal, including battery components) critically there are no tailpipe emissions which is in marked contrast to internal combustion engines, therefore benefiting local air quality. The electric vehicle (EV) charging requirement is new, but is considered important and justifiable because it is expected the sale and use of electric powered vehicles will increase rapidly in forthcoming years. Apart from the Homebuilders Federation objecting to the requirement for EV chargers, on the grounds that the national initiative has yet to be published (expected 2022) there have been no other objections to the 10% minimum requirement in development.

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1.10 Elsewhere, on Merseyside for example, at least 10% of parking spaces must be marked out for use by EVs only, together with an adequate charging infrastructure and cabling for each marked bay.

1.11 Paragraph 112 of the NPPF21 states "... [Planning] applications for development should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations."

1.12 There are economic and environmental reasons for councils to encourage the adoption of EVs on their road networks, including reducing emissions of carbon dioxide and harmful air pollutants. There will likely be an expectation from residents and visitors that their destination will have adequate coverage of convenient and affordable electric vehicle charging infrastructure available to use.

1.13 The Government have committed to end the sale of new petrol and diesel cars by 2030 and to ensure all new cars and vans will be zero emissions at the tailpipe by 2035. Local policy now supports this commitment.

**Are the thresholds for transport assessments and travel plans in Appendix D2 justified?**

1.14 The thresholds are based on those long established, which have been used without issue since the 2006 Local Plan was published. The only notable change is the requirement for a Transport Assessment when 50 or more dwellings are proposed, considered to give a suitable balance between the 100 dwellings threshold used previously and 10 dwellings which constitutes major development.

1.15 Paragraph 113 of the NPPF indicates that all developments that generate significant amounts of transport movement should be supported by a Transport Statement or Transport Assessment. Therefore, below the thresholds stated in Appendix D2 and above 500m<sup>2</sup> GFA a Transport Statement is required, which should accord with Planning Practice Guidance.

1.16 The Council considers the requirement for transport statements, transport assessments and travel plans to be justified. They accord with Planning Practice Guidance and ensure all highways, traffic and transport issues are assessed, ensuring appropriate mitigation. Also with travel plans, processes put in place to encourage more sustainable travel patterns are vital to help improve local health, air quality and address Climate Change.

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**Have the requirements of Policy 41 and Appendix D1 and D2 been considered in the Council's viability assessment?**

1.17 With respect to the viability assessment, the Council appointed Lambert Smith Hampton (LSH), a suitably qualified and experienced consultancy, in June 2019 to advise on and prepare a Local Plan Viability Assessment ('LPVA') to undertake an economic viability assessment of the emerging SADMP including the draft requirements set out in the emerging Affordable Housing Supplementary Planning Document (SPD) and Greening Blackpool SPD in conjunction with adopted policy set out in the Blackpool Local Plan Part 1: Core Strategy and guidance set out in adopted SPDs.

1.18 LSH has reviewed the adopted Core Strategy and the emerging Site Allocations and Development Management Policies to identify whether adopted and emerging policies will have a direct, indirect or no impact on development viability. The viability impact matrix is included at Appendix 1 to the viability assessment ([document EB002](#)). At paragraph 3.9 of the viability assessment LSH determined which policies in the SADMP will have a direct viability impact and listed 5 policies which including DM41. At paragraph 3.10, LSH state that a number of these policy requirements are long standing obligations of the planning system and make reference to design and development quality, landscaping and transport requirements and state that the costs associated with these obligations are factored into existing development costs. In light of LSH's findings they recommend amendments to several aspects of policy but did not propose any specific amendments to Policy DM41 or the associated Parking Standards.

**2. Is Policy DM42 soundly based? Is the detailed wording effective? Should the policy or its explanation make specific reference to Warton Aerodrome?**

2.1 It is considered that DM42 is soundly based. Aerodrome safeguarding is necessary to ensure that the operation and development of airports are not inhibited by buildings, structures, erections or works which would infringe on protected surfaces, obscure runway approach lights or have the potential to impair the performance of aerodrome navigation aids, radio aids or telecommunication systems; by lighting which has the potential to distract pilots; or by developments which have the potential to increase the number of birds or the bird hazard risk.

2.2 Main Modifications are now proposed (MainMod24 and MainMod25) ([EL1.002b](#)) to make specific reference to Warton Aerodrome in the policy and supporting text in response to a representation received from the Ministry of Defence.