

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

Matter 2: Is the overall approach to housing and economic growth in the SADMP consistent with the Blackpool Local Plan Part 1: Core Strategy (2016) (CS)?

Blackpool Council Statement

November 2021

Blackpool Council

The logo for Blackpool Council features the text "Blackpool Council" in a serif font. The word "Blackpool" is in a dark blue color, and "Council" is in a purple color. Below the text is a stylized graphic consisting of two horizontal, wavy lines in shades of blue and grey.

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:

- [SADMP – SD001](#)
- [Blackpool Local Plan Part 1: Core Strategy \(adopted January 2016\)](#)
- [Housing Topic Paper \(EB003\)](#)
- [Retail Topic Paper – Future capacity \(December 2020\) \(EB014\).](#)
- [Employment Land Update Paper \(EB013\)](#)
- [Blackpool Employment Land Study 2013 \(ELS\)](#)
- [Blackpool, Fylde and Wyre Gypsy and Traveller Accommodation Assessment Update \(GTAA\) \(October 2016\) \(EB008\)](#)
- [Gypsy, Traveller & Travelling Showpeople Topic Paper \(November 2019\) \(EB007\)](#)
- [Duty to Cooperate Statement of Common Ground \(SoCG\) – DC001](#)
- [Local Plan Part 2 Viability Assessment \(July 2020\) \(EB002\)](#)

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Matter 2: Is the overall approach to housing and economic growth in the SADMP consistent with the Blackpool Local Plan Part 1: Core Strategy (2016) (CS)?

Position of the Council regarding Matter 2

Issue (vi): To what extent would the development allocations, taken together, be consistent with the Blackpool Local Plan Part 1: Core Strategy (2016) (CS)?

Questions:

1. Is the spatial distribution of development allocations in the SADMP consistent with Policy CS1 of the CS?

1.1 In order to deliver the Core Strategy vision, the overarching spatial focus for Blackpool is regeneration and supporting growth. Policy CS1 states that Blackpool's future growth, development and investment will be focused on inner area regeneration, comprising:

- a. Blackpool Town Centre, including the three strategic sites of Central Business District, Winter Gardens and Leisure Quarter
- b. The Resort Core, containing the promenade and the majority of resort attractions and facilities, holiday accommodation and major points of arrival
- c. Neighbourhoods within the inner areas, including mixed holiday and residential neighbourhoods adjacent to the seafront, and predominately residential neighbourhoods on the edge of the inner areas.

1.2 In addition, Policy CS1 also provides for supporting growth in South Blackpool to help meet Blackpool's wider housing and employment needs ([Core Strategy Figure 10: Key Diagram refers](#)). The policy also recognises the important character of remaining lands at Marton Moss, identified as a strategic site for neighbourhood planning (policy CS26 refers).

1.3 It is considered that the spatial distribution of development allocations in the SADMP is broadly consistent with Policy CS1 of the Core Strategy. However, it should be noted that whilst Policy CS1 provides the overarching spatial focus for development, it does not exclude development that comes forward outside of these identified areas.

1.4 With respect to the Housing Allocations identified in policy HSA1, nine are located within the defined Inner Area in line with 1c of CS1. Most notably HSA1.23 comprises a major housing regeneration site within the Inner Area.

1.5 Housing allocations HSA1.24, HSA1.14 and HSA1.13 contribute to a more balanced housing offer in South Blackpool to improve choice in the sub-regional housing market area.

1.6 The Town Centre Mixed Use Site (MUSA1) is located within Blackpool Town Centre. The supporting text to CS1 at paragraph 4.6 recognises that the town centre must be a focus for future economic growth, development and investment in order to successfully position it as the first choice shopping destination for Fylde Coast residents and an attractive place to visit and do business. The site allocation therefore contributes to the offer within the town centre in accordance with CS1.

2. Generally, do the housing allocations detailed in Policy HSA1 of the SADMP meet the requirements of Policy C2 of the CS and accord with national policy? Does the SADMP provide for a sufficient amount and range of housing sites including at least 10% of the housing requirement on sites no larger than one hectare¹?

2.1 Policy CS2 sets out that provision will be made for the delivery of 4200 (net) new homes in Blackpool between 2012 and 2027. These new homes will be located on:

- Identified sites within the existing urban area, including major regeneration sites;
- Identified sites within the South Blackpool Growth area; and
- Windfall sites

2.2 Paragraph 5.11 of the supporting text states *‘Identified sites within the existing urban area, including major regeneration sites, will be allocated in the Site Allocations and Development Management Policies document. These sites are likely to include some or all of those identified in the Strategic Housing Land Availability Assessment (SHLAA) which comprises sites committed for development; vacant underused or derelict land considered potentially suitable for housing; and major regeneration sites within the inner areas, priority neighbourhoods and resort core including seafront.’*

2.3 The Housing Topic Paper ([EBO03](#)) provides the detailed background information and evidence to support the housing policies in the SADMP. Section 3 of the Topic Paper sets out in detail how the Council will meet its housing requirement over the plan period. The housing allocations set out in HSA1 are either **‘identified sites within the existing urban area, including major regeneration sites’** or **‘identified sites within the South Blackpool**

¹ Per paragraph 69 of the NPPF

Growth area'. The remainder of the housing supply as identified in Table 6 of the Housing Topic Paper would fall within one of the three criteria.

2.4 In terms of national policy Paragraph 69 of NPPF 2201 states:

'Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

(a) specific, deliverable sites for years 1 to 5 of the plan period [34](#); and

(b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

2.5 The approach taken to the identification of sites for housing allocations is set out in Section 4 of the Housing Topic Paper. The SHLAA is the key source of potential sites for housing allocation in the Local Plan Part 2. The Council published its first SHLAA in May 2008. This was followed by updates in 2009, 2010, 2011 and 2013 (published in 2014). The 2013 SHLAA Update identified 153 potential housing sites. All of these sites were assessed as part of the 2019 SHLAA Update process to see to see whether they were still appropriate for inclusion as potential housing sites.

2.6 Taking account of the above, the Council therefore considers that the housing allocations detailed in Policy HSA1 of the SADMP meet the requirements of Policy C2 of the CS and accord with national policy.

2.7 The Council considers that the SADMP provides for a sufficient amount and range of housing sites as evidenced in the Housing Topic Paper ([EB003](#)) at Sections 3 and 4. The identified housing supply is summarised in the table below. A supply of approximately 4,544 dwellings has been identified, which exceeds the housing requirement of 4,200 dwellings and ensures that there is a flexible portfolio of housing sites that can be delivered throughout the plan period.

Housing Supply over the Plan period (2012-2027) (Source: [Housing Topic Paper](#))

Housing Supply Summary	
Source	Number of Dwellings
Completions 1 April 2012 – 31 March 2019	1,307
New build dwellings with extant permission at 31 March 2019 (including 584 dwellings on allocated sites)	1,177
New build dwellings with permission granted since 01 April 2019 (including 145 dwellings on allocated sites)	175
Permitted conversions/changes of use (10 or more dwellings) at 31 March 2019	140
Permitted conversions/changes of use granted since 01 April 2019 (10 or more dwellings)	105
Windfall Allowance for conversions/changes of use (9 or less dwellings) over period 1 April 2019 – 31 March 2027	800
Allocated housing sites without planning permission	690
Additional supply from Town Centre Strategic Sites	150
Total Housing Supply	4,544

2.8 In addition to the site allocations identified in Policy HSA1, windfall development makes a significant contribution to the housing supply over the plan period.

2.9 The issue of windfall housing provision was considered by the Blackpool Core Strategy Inspector ([paragraph 42 of the Inspector’s Report](#)). He notes that the majority of windfall site developments in Blackpool are anticipated to be conversions (notably of hotels and guest houses) in the inner areas and that the Council is encouraging such schemes in appropriate circumstances as part of its regeneration strategy. He states that *“Given this, the availability of such premises in Blackpool and the evidence of windfall housing development at around 100 dpa in recent years, there is compelling evidence that windfalls will continue to provide a reliable source of housing land supply during the plan period”* (para. 42).

2.10 Therefore, the Inspector considered that there was compelling evidence to justify a windfall allowance of around 100 dwellings per year in Blackpool. This is reflected in Core Strategy Policy CS2, which identifies windfall housing as one of the three sources of housing provision in Blackpool.

2.11 The table below summarises the windfall delivery that has occurred over the plan period and shows that windfall continues to make a significant contribution to meeting the housing requirement. It shows that between 2012 and 2020 (discounting 2020/2021 due to the Covid-19 pandemic) a total of 1,220 dwellings have been delivered (an average of 152.5 dwellings per annum), over the 8 year period.

Windfall development over the plan period (Source: Blackpool Housing Monitoring Report 2020/21)

Year	Conversions/ Changes of Use: Permitted & CLDE/CLUP/CPA			Conversions: Other Sources	Windfall Conversions / Changes of Use Total	Windfall New Build	Windfall Total
	Small Sites	Major Sites	Total				
2012/13	99	24	123	-10	113	39	152
2013/14	129	22	151	-37	114	0	114
2014/15	148	31	179	44	223	0	223
2015/16	149	12	161	0	161	1	162
2016/17	95	16	111	0	111	-13	98
2017/18	117	10	127	0	127	9	136
2018/19	115	14	129	0	129	40	169
2019/20	153	31	184	16	200	-34	166
2020/21*	50	11	61	7	68	1	69
Total	1055	171	1226	20	1246	43	1,289

*Delivery affected by the Covid-19 pandemic

2.12 The Council considers that the SADMP provides for a sufficient range of housing sites including at least 10% of the housing requirement on sites no larger than one hectare. The housing allocations identified in policy HSA1 of the SADMP are set out in the table below. The table clearly demonstrates that the housing sites are of a variety of sizes, delivering between 10 and 192 dwellings. There is also a mix of greenfield and brownfield sites.

Site Reference	Site Area (ha)	Number of dwellings expected to be delivered 2019 - 2027	Land Type
HSA1.1 Former Mariners Public House, Norbreck Road	0.20	35	Brownfield
HSA1.2 Former Bispham High School & Land off Regency Gardens	9.10	176	Mixed
HSA1.3 Land at Bromley Close	0.22	12	Greenfield
HSA1.4 Land to the rear of 307-339 Warley Road	0.33	14	Greenfield
HSA1.5 Land at Chepstow Road/Gateside Drive and land at	5.62	160	Mixed

Site Reference	Site Area (ha)	Number of dwellings expected to be delivered 2019 - 2027	Land Type
Dinmore Avenue/ Bathurst Avenue, Grange Park			
HSA1.6 Land at George Street/Coleridge Road	0.14	14	Brownfield
HSA1.7 190 – 194 Promenade	0.12	15	Brownfield
HSA1.8 South King Street	0.59	47	Brownfield
HSA1.9 Bethesda Road Car Park	0.13	13	Brownfield
HSA1.10 Whitegate Manor, Whitegate Drive	0.31	16	Brownfield
HSA1.11 Land off Kipling Drive	0.27	14	Greenfield
HSA1.12 Land at Rough Heys Lane	0.67	27	Greenfield
HSA1.13 Land at Enterprise Zone, Jepson Way	1.42	57	Mixed
HSA1.14 Site B, Former NS & I Site, Preston New Road	3.31	90	Brownfield
HSA1.15 Land at Warren Drive	3.12	86	Greenfield
HSA1.16 Land at Ryscar Way	2.06	47	Greenfield
HSA1.17 Land at 50 Bispham Road	0.09	12	Brownfield
HSA1.18 41 Bispham Road and land to the rear of 39-41 Bispham Road	0.35	16	Mixed
HSA1.19 Kings Christian Centre, Warley Road	0.12	15	Brownfield
HSA1.20 Land off Coopers Way	1.22	45	Brownfield
HSA1.21 Land at Coleridge Road/ Talbot Road	0.29	25	Brownfield
HSA1.22 7-11 Alfred Street	0.04	14	Brownfield
HSA1.23 Foxhall Village Phases 2(S), 3 & 4	2.97	192	Brownfield
HSA1.24 Site A, Former NS & I Site, Preston New Road	5.11	83	Mixed
HSA1.25 Site of Co-operative Sports and Social Club, Preston New Road	1.57	45	Mixed
HSA1.26 9-15 Brun Grove (Blackpool Trim Shops)	0.18	10	Brownfield
HSA1.27 Waterloo Road Methodist Church, Waterloo Road	0.14	12	Brownfield
HSA1.28 Land at 200-210 Watson Road	0.89	39	Brownfield
HSA1.29 585-593 New South Promenade and 1 Wimbourne Place	0.40	88	Brownfield

2.13 Paragraph 69 of NPPF recognises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.

2.14 Due to the built up nature of Blackpool the majority of housing sites that come forward are small in scale. Paragraph 4.51 of the Housing Topic Paper states '*To promote the development of small and medium sized housing sites, the NPPF requires Councils to identify land to accommodate at least 10% of their requirements on sites of no larger than one hectare. 207 of the 690 dwellings identified on the proposed allocations are on sites of no larger than one hectare, which equates to 30% of the identified dwellings. 71% of the identified sites are no larger than one hectare.*'

2.15 Notwithstanding the above in relation to the 71%, with respect to windfall, which makes a significant contribution to the housing requirement as discussed above and evidenced at paragraphs 3.17-3.26 of the Housing Topic Paper ([EB003](#)) and annual Housing Monitoring Reports, the majority of these developments come through conversions of existing holiday accommodation and are on sites of less than a hectare.

3. Does Policy MUSA1 of the SADMP meet the requirements of and is it consistent with Policy CS4 of the CS?

3.1 It is considered that site allocation MUSA1 of the SADMP meets the requirements and is consistent with Policy CS4 of the Core Strategy.

3.2 The site allocation is located within Blackpool Town Centre which is the focus of new retail development as set out in within Point 1a of the policy. The site allocation contributes towards strengthening the Town Centre offer and improving the quality of the shopping experience. Further information is set out the Retail Topic Paper – Future capacity (December 2020) ([EB014](#)).

4. Are Policies DM7 and DM8 of the SADMP consistent with Policies C3 and CS2 of the CS? What is the justification for an additional 9 hectares of employment land at the Blackpool Airport Enterprise Zone (BAEZ)?

Are Policies DM7 and DM8 of the SADMP consistent with Policies C3 and CS2 of the CS?

4.1 It is considered that policies DM7 and DM8 are consistent with policies CS3 and CS2 of the Core Strategy.

4.2 Core Strategy policy CS3 states:

1. Sustainable economic development will be promoted to strengthen the local economy and meet the employment needs of Blackpool and the Fylde Coast Sub-Region to 2027, with the focus on:

a. Safeguarding around 180 hectares of existing industrial/business land for employment use; and enhancing these sites with new employment development on remaining available land and through opportunities for redevelopment

b. Promoting office development, enterprise and business start-ups in Blackpool Town Centre including the Central Business District

c. Promoting land in South Blackpool as a strategic priority, to help strengthen the Fylde Coast economy and make an important contribution towards meeting the future employment needs of Blackpool residents

4.3 The land identified in DM7 and DM8 forms part of the 180 hectares of existing industrial/business land for employment use that is to be safeguarded in Point 2c of CS3. Furthermore DM8 and some of the identified employment areas in DM7 are located within Blackpool South reflecting of point 1 c of the policy.

4.4 The housing development at point 3e of policy DM8 (also site allocation HSA1.13) aligns with CS2 as it contributes toward the overall housing requirement identified in the policy. CS2 also acknowledges the contribution of housing sites in South Blackpool to a balanced housing market in Blackpool.

4.5 The supporting text to CS3 acknowledges that in order to facilitate regeneration, redevelopment opportunities which introduce a suitable mixed-use development, including housing, will be considered where it is exceptionally and robustly justified as necessary to secure the future business/industrial use of the site. Any such enabling development should not conflict with wider plan objectives. Housing

What is the justification for an additional 9 hectares of employment land at the Blackpool Airport Enterprise Zone (BAEZ)?

4.6 With respect to the justification for an additional 9 hectares of employment land at the Blackpool Airport Enterprise Zone, detail of the additional employment land is set out in the Employment Land Update Paper ([EB013](#)) at page 13.

4.7 The importance of the additional 9 hectares of employment land at the BAEZ, enables land receipts from the sale of the released land for additional employment plots and is essential to the overall economic viability of the BAEZ and this is set out in the Blackpool Council Executive Report of 18 June 2018.²

² Executive Report 18 June 2018 submitted to the Examination Library

4.8 The designation of the EZ directly supports the delivery of the Core Strategy Vision and strategy to support new business growth and secure sustainable investment that will broaden the job opportunities diversifying the economy beyond the seasonal tourism visitor economy. In particular the BAEZ designation aligns with:

- **Goal 1- Sustainable regeneration diversification and growth** specifically **Objective 3:** *to strengthen the local economy through sustainable investment in new enterprise, entrepreneurship and business starts ups creating better paid jobs and a wider choice of employment;*
- **Goal 4: Supporting growth and enhancement in South Blackpool to meet future housing and employment needs for Blackpool and the Fylde Coast, specifically Objective 17:** *Support economic growth along the Blackpool Airport Corridor and on lands close to Junction 4 of the M55; and*

Policies CS1: Strategic Locations for Development; **CS3:** Economic Development and Employment and **CS24:** South Blackpool Employment Growth of the adopted Core Strategy

4.9 See also response to Matter 3 Issue (vi) Question 7.

4.10 The supply of employment land over the plan period was originally identified in the Blackpool Employment Land Study 2013 ([ELS](#))³ which forms part of the evidence base underpinning the Core Strategy, in particular Policy CS3: Economic Development and Employment. Core Strategy Policy CS3 safeguards around 180 ha of employment land within the Borough. This included 3ha at the NS&I site which is now allocated for housing (HSA1.23) as it was proved unviable to develop for business/industry through the site allocation process.

4.11 Therefore the proposed additional 9 hectares at the BAEZ compensates for the loss of employment land at the former NS&I site and also provides additional land to support the delivery of the BAEZ.

5. Does the SADMP make appropriate provision for Gypsies and Travellers, Travelling Showpeople, other caravan dwellers and houseboat dwellers in line with Policy CS16 of the CS and national policies? Is the relevant evidence on the need for such accommodation up to date and consistent with national policy?

³ Submitted to the Examination Library

5.1 The SADMP evidence base in relation to Gypsies, Travellers and Travelling Showpeople comprises:

- Blackpool, Fylde and Wyre Gypsy and Traveller Accommodation Assessment Update (GTAA) (October 2016) ([EB008](#))
- The Gypsy, Traveller & Travelling Showpeople Topic Paper (November 2019) ([EB007](#))

5.2 The three Fylde Coast authorities commissioned suitably qualified and experienced consultants Opinion Research Services (ORS) to undertake a Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTAA) to provide an understanding of the likely permanent and transit accommodation needs of gypsies, travellers and travelling showpeople within the sub-region and for each of the three authorities. The GTAA final report was published in September 2014 and set out pitch and plot targets for the sub-region and for the individual authorities over their respective plan periods. However, in 2015 the Government changed the definition of travellers and this necessitated an update of the GTAA to be undertaken. ORS published an update of the GTAA for the three authorities in October 2016. This provided updated pitch and plot targets for gypsies/travellers and for travelling showpeople that met the revised definition.

5.3 Taking account of the above, the GTAA is considered to be up to date and prepared in line with the Planning Policy for Traveller Sites (August 2015).

5.4 The Gypsy, Traveller & Travelling Showpeople Topic Paper ([EB007](#)) summarises the outcomes of the GTAA and explains the approach Blackpool Council has taken to gypsy/traveller and travelling showpeople provision.

5.5 Overarching Core Strategy Policy CS16: Traveller Sites states *'The target for new permanent and transit pitches and plots will be set out in the Blackpool Local Plan Part 2: Site Allocations and Development Management document, according to the most recent Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment agreed by the Council'*. It also sets out criteria to provide the basis for determining any planning applications for gypsy/traveller pitches or travelling showpeople plots that come forward in Blackpool.

5.6 The 2016 GTAA indicated a need for 6 additional pitches for gypsies/travellers in Blackpool over the plan period. No need was identified in Wyre and Fylde was identified as having an overprovision of two pitches. Furthermore, in August 2018 Fylde Council granted permission for an additional two gypsy and traveller pitches (planning permission ref

17/0495). The Committee report⁴ for this application highlighted the unmet need for pitches in the sub-region and this was a factor that was taken into consideration when granting permission. Therefore, when considering the sub-regional need and taking into account the 4 additional pitches provided by Fylde Council, the outstanding sub-regional need for gypsies and travellers was two pitches.

5.7 In terms of travelling showpeople, the 2016 GTAA indicated a need for 24 travelling showpeople plots across the Fylde Coast sub-region. 5 of these plots were in Blackpool, 19 were in Wyre and there was no requirement in Fylde. Wyre Council is making provision for its need on a site that has been allocated in the Wyre Local Plan on the edge of Garstang.

5.8 In the development of policy in the Core Strategy and in the SADMP and the provision of Traveller and Travelling Showpeople accommodation in the Borough, the Council has taken a positive approach not only through working with neighbouring authorities Fylde and Wyre Councils on a jointly prepared sub-regional evidence base to establish the an up to date need for such accommodation, but also through the development management process with the approval of such sites which are identified below:

Additional permissions granted in Blackpool Borough for gypsy/traveller pitches

Appn	Address	Proposal	Decision Date	No. of Pitches
18/0156	411 Midgeland Road	Use of land as a traveller caravan site for 2 caravans and 1 chalet	05/02/19	1
19/0094	Land adjacent to Greenacres, 161 School Road	Use of land as a residential traveller caravan site for 4 caravans (2 static caravan/mobile homes and 2 touring caravans)	31/07/19	2
Total number of pitches				3

Additional permissions granted in Blackpool Borough for travelling showpeople plots

Appn	Address	Proposal	Decision Date	Number of Plots
19/0011	Brookeview, 516 Midgeland Road	Use of land as a travelling showperson's site for up to 5 caravans (3 static and 2 tourers)	02/04/19	3
16/0267	Land adjacent to Whalley Farm, Whalley Lane	Use of land as a travelling showperson's site for up to 5 caravans (3 static and 2 tourers)	09/09/19	3
Total number of plots				6

⁴ Submitted to the examination library

5.9 These permissions have resulted in the need identified in the GTAA being met and has negated the need to allocate such sites in the SADMP. Notwithstanding the above Policy CS16 provides the basis for determining additional applications if such applications are forthcoming. Council therefore considers that with the permissions granted and the criteria based policy at CS16 that appropriate provision is made for Travellers and Travelling Showpeople in the Local Plan.

5.10 This approach has been endorsed by Fylde and Wyre Council's through the Duty to Co-operate process. The SoCG ([DC001](#)) at Page 26 and 27 describes how the three councils have co-operated with respect to the provision across the sub-region. It recognises that *'subsequent to the informal consultation in January/February 2019 further planning permissions have been granted for Traveller Pitches and Travelling Showpeople plots in the sub-region. Consequently the outstanding need identified in the 2016 GTAA has been met as agreed by the three authorities.'*

6. Has the viability of the SADMP been tested and evidenced in accordance with the advice contained in the PPG⁵ and does the viability evidence take into account relevant policy requirements arising from the SADMP and the CS?

6.1 The SADMP is accompanied by the Local Plan Part 2 Viability Assessment (July 2020) ([EB002](#)). 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 Blackpool Local Plan Part 2: Site Allocations and Development Management Policies (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.

6.2 Section 2 of the LPVA recognises that viability testing in order to objectively assess deliverability has become a key part of the plan making process. It confirms that the LPVA has been prepared in this context and takes full account of all relevant primary legislation, statutory regulations, mandatory planning guidance and policy, best practice and potential public policy changes. Furthermore, Paragraph 2.10 makes specific reference to the Viability in Plan-making PPG.

⁵ Viability 1 September 2019

6.3 Paragraph 4.2 of the LPVA confirms the assessment has regard to national planning policy guidance and relevant professional guidance and reports published by various bodies to facilitate this process.

6.4 With respect to the policy requirements arising from the SADMP and Core Strategy, Section 7 of the LPVA explains the method adopted to conduct the viability analysis, the assumptions adopted in the viability modelling and the stakeholder engagement undertaken to test these assumptions. Appendix 1 of the LPVA sets out in detail the potential viability effect of adopted and emerging Local Plan documents.

6.5 Taking account of the above, the Council considers that the viability of the SADMP has been tested and evidenced in accordance with the advice contained in the Viability in Plan-making PPG and the viability evidence takes into account relevant policy requirements arising from the SADMP and the Core Strategy.