

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

Matter 3: Is the SADMP's approach to the Green Belt (GB) justified and consistent with national policy?

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:

- [SADMP – SD001](#)
- [SADMP Policies Map SD002](#)
- [Blackpool Local Plan Part 1: Core Strategy \(adopted January 2016\) \(AD004\)](#)
- [National Planning Policy Framework \(NPPF21\)](#)
- [SADMP Regulation 18 Scoping Document \(2017\) \(AD002\)](#)
- [SADMP Informal Consultation Document \(2019\) and Appendices \(AD001\)](#)
- [Executive Report – Blackpool Airport Enterprise Zone Delivery Plan 18 June 2018](#)
- [Employment Land Technical Paper \(2014\)](#)
- [Fylde Local Plan to 2032](#)
- [Local Green Belt Review Assessment \(EB021\)](#)
- Memorandum of Understanding Blackpool Airport Enterprise Zone Lancashire – Part of the Lancashire Advanced Manufacturing Energy Cluster (9th November 2016) (Submitted to Examination Library)
- [Blackpool Enterprise Zone Masterplan 2018 \(EL1.002e\)](#)
- [Blackpool Enterprise Zone Masterplan 2020 Plan \(EL1.021d\)](#)
- [Planning application 20/0108](#)
- Planning application 20/0564
- South Ribble Local Plan - [Inspector's Final Report on the Examination into the Site Allocations and Development Management Policies Development Plan Document \(June 2015\)](#)
- Blackpool Green and Blue Infrastructure Strategy and Action Plan 2019 [EB019](#) and [EB020](#)

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Matter 3: Is the SADMP's approach to the Green Belt (GB) justified and consistent with national policy?

Position of the Council regarding Matter 3

Issue (vii): Do exceptional circumstances exist sufficient to justify the alteration of the GB's boundaries?

Questions:

1. Do strategic policies establish the need for the proposed changes to the GB boundary? If so, which policies and how do they establish the need?

1.1 Reference is made to Green Belt in [Core Strategy](#) Policy CS6: Green Infrastructure. At point 1a it states that 'in terms of Green Belt areas, the Council will apply national policy to protect their openness and character, and retain the local distinctiveness'. The policy also states that there is no **planned** strategic review of the existing Green Belt Boundary during the plan period.

1.2 Following the Examination of the Core Strategy in May 2015, the Blackpool Airport Enterprise Zone (BAEZ) was designated in November 2015 which included within the boundary, a small area of green belt within Blackpool, located in the south east corner of the BAEZ (Local Green Belt Review Assessment document [EB021](#) Figure 5 refers). In response to the BAEZ designation, a local amendment to the green belt through the local plan process has been proposed in the SADMP to address this anomaly in the boundary at this specific location with justification set out in the Local Green Belt Review Assessment ([EB021](#) refers).

1.3 It is acknowledged that the Core Strategy in Policy CS6 does not expressly identify that the SADMP will review the green belt boundary, however the policy itself refers to 'planning for' which the Core Strategy policy could not have envisaged because the evolution of the BAEZ proposals occurred after formulation of the Core Strategy policy for the green belt. However the Core Strategy as a whole is being given effect to by the SADMP and in relation to the green belt by the policy adjustments (relatively minor) which themselves meet the policy imperatives for release of green belt land or adjustment of the green belt boundary. To be precise and in relation to removal of the green belt at the BAEZ, this gives effect to the strategy in particular [Core Strategy](#) policies CS1, CS3 and CS24; and the amendments to the green belt boundary at Faraday Way meeting the policy requirements in [NPPF](#) at paragraph 143.

1.4 Taking into account the above it is considered that the proposed minor adjustments to the green belt have been clearly referenced and understood being included throughout the development of the SADMP as follows:

- in the [Regulation 18 Scoping document \(2017\)](#) (AS002)(page 7 paragraph 3.1)
- in the SADMP [Informal consultation document \(2019\)](#) (AD001) Section 2 and [Appendices](#) (AD001a) (page 54); and accompanying [Local Green Belt Review Assessment consultation draft \(dated October 2018\)](#);
- SADMP Regulation 19 (Submission Document) ([SD001](#) refers) at page 13 paragraphs 2.20 to 2.24 and page 30 of Schedule 1 to the SADMP allocation HSA1.13; and accompanying Local Green Belt Review Assessment (November 2019) ([SD021](#)) and Policies Map ([SD002](#) refers)

1.5 However if the Inspector considers that the SADMP needs to have a more explicit acknowledgment of the boundary changes, then the Council will be content under Section 20(7c) of the 2004 Act of the insertion of a policy following on from Section 2 and prior to current Section 3 of the SADMP, introducing a specific green belt boundary policy and supporting text, the wording of which could be as follows:

Policy GB1 - Green Belt Boundary Amendments

The green belt boundary is amended at the following locations as identified in Appendix X and on the Policies Map:

- (i) At the Blackpool Airport Enterprise Zone north of Division Lane West, to enable the delivery of the Enterprise Zone; and**
- (ii) At Faraday Way to meet the policy requirements set out in paragraph 143 (f) of NPPF.**

Supporting text

Blackpool Airport Enterprise Zone (BAEZ)

The Local Green Belt Review Assessment (November 2019) highlights the green belt designation in the BAEZ north of Division Lane West comprising some 13.93ha of Green Belt which includes land at South Shore Cricket, Squash and Rugby Club, Spirit of the Youth Football Club and a remediated waste lagoon associated with airport operations.

The green belt at this location appears to ‘punch ‘into the existing urban area and is surrounded to the west and north by established business/industrial sites and to the east by the B52619 (Common Edge Road) - a key transport route between Blackpool and St Annes to the south with fronting housing and a commercial garden centre

This parcel of land is therefore not considered to meet the specific purpose of the Green Belt as set out under paragraph 138 of NPPF 2021.

Taking the above into account and in light of the Government's commitment to delivery of the Blackpool Airport Enterprise Zone, the Green Belt boundary has been amended accordingly.

Faraday Way

The minor changes to the green belt boundary at Faraday Way do not compromise the purpose of the green belt as set out under paragraph 138 of NPPF. The changes correct anomalies and ensure the boundary accords with paragraph 143 of NPPF 2021, in particular point (f). The limited extent of these changes and the net gain of green belt overall of some 0.396 hectares in total at Faraday Way mean that they have no material impact on the function of the Green Belt at this location and are only proposed to ensure that the boundary on the ground is consistent with the final bullet of paragraph 143 of the NPPF in that the amendments provide clearly define boundaries, using physical features that are readily recognisable and likely to be permanent.

In summary the green belt review evidence base shows that the changes to the green belt at BAEZ and Faraday Way are better served in meeting green belt policy as contained in NPPF21 by the new boundaries as adjusted.

2. Have reasonable alternatives to the release of GB sites been adequately explored, and have all reasonable options for meeting the CS requirements been fully examined?

2.1 The release of Green Belt in the south of the Borough is intrinsically linked with the delivery of the BAEZ which was designated in 2015 and became operational in April 2016. (refer to response to Q4 below). Therefore, the BAEZ being in the location that it is, confines the opportunities that BAEZ has to successfully bring forward the BAEZ and the employment benefits it confers.

2.2 In terms of looking at alternative development scenarios within the BAEZ ([SD002d](#) refers), other land opportunities within the BAEZ boundary that could deliver suitably sized plots, responding to business demand and providing the necessary land receipts required to underpin the economic viability of the BAEZ are not available. The operational airport land in the west of the BAEZ, some of which is also in the green belt, does not provide

appropriate development opportunities to meet Phase 1 of the Delivery Plan¹, alongside the need to ensure current air related activities are not compromised. The existing employment areas within the BAEZ (formerly Blackpool Business Park, Sycamore Trading Estate and Squires Gate Industrial Estate) also have limited opportunities for raising the necessary revenue. The importance of the land currently designated as greenbelt in the south east corner of BAEZ to the economic viability of the BAEZ is emphasised in the 18 June 2018 Executive Report (submitted to the Examination Library).

3. Has the Council appropriately considered land that has been previously developed and or is well-served by public transport, before concluding it is necessary to release GB land for development?

3.1 The release of Green Belt in the south of the Borough is intrinsically linked with the delivery of the BAEZ. Therefore, it is not reasonable to consider land that has been previously developed and or is well-served by public transport elsewhere in the Borough. The BAEZ being in the location that it is, confines the opportunities that BAEZ has to successfully bring forward the BAEZ and the employment benefits it confers. Response to Q2 above relates.

4. To what extent can it be demonstrated that exceptional circumstances exist sufficient to alter GB boundaries as proposed?

4.1 NPPF 2021 Paragraph 140 states: “Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.” The Council sets out below what it considers to be the exceptional circumstances necessary to justify releasing land located within the BAEZ from the Green Belt for economic and housing development (please refer to response to Matter 4 Issue (ix) Q.7 re housing development); and the amendments to the green belt boundary at Faraday Way to align with green belt policy in NPPF. In this respect the Council will rely on the following matters:

- **The Importance of the BAEZ and the economic development it confers;** and
- **The green belt evidence base**

¹ Refer to Executive Report – Blackpool Airport Enterprise Zone: Delivery Plan 18 June 2018 – Submitted to the Examination Library

The Importance of the BAEZ and the economic development it confers

4.2 The [NPPF](#) at paragraph 81 states planning policies should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. In addition, NPPF 2021 paragraph 142 states “When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account”.

4.3 To provide some background with respect to business and employment development in Blackpool, Policy CS3 of the Core Strategy sets the strategic policy in relation to Economic Development and Employment. Point 1c of the policy promotes 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. At paragraph 5.42 of the supporting text to CS3 it is acknowledged that developing lands along the Blackpool Airport corridor and surrounding existing business areas to deliver sustainable development is critical to capitalise on this major economic asset.

4.4 Specifically relating to employment growth in South Blackpool, Core Strategy policy CS24: South Blackpool Employment Growth supports:

- Redevelopment of existing employment sites within South Blackpool to provide high quality modern business/industrial facilities (Class B uses)
- Proposals for major new business/industrial development (Class B uses) in principle at sustainable locations within wider lands at South Blackpool to support sub-regional economic growth, including, Blackpool Airport Corridor.

4.5 Blackpool is intensely developed and has a tightly constrained boundary, which means there is a demonstrable lack of future development land. Opportunities for further employment expansion within the Borough are therefore extremely limited. In particular, the Core Strategy recognises that Blackpool could not accommodate its own employment land requirement on lands within the Blackpool boundary (further background is found within the [Employment Land Technical Paper \(2014\)](#)). The outcome of co-operation between Blackpool and Fylde Councils on this issue means that Fylde has provided 14 hectares of additional employment which has been added to Fylde’s requirement over their Local Plan period to 2032 (Fylde Local Plan-adopted 2018).

Blackpool Airport Enterprise Zone

4.6 In recognition of the need to support economic growth within Blackpool, the Fylde sub-region and the wider Lancashire in 2014 the then DCLG (now Department of Levelling Up, Housing and Communities) invited the Lancashire Economic Partnership (LEP) supported by Blackpool and Fylde Councils to submit a bid for Enterprise Zone status at Blackpool Airport and adjacent employment areas. This bid was successful with the Government announcing the designation of the BAEZ on 12th November 2015. The BAEZ became operational in April 2016 with the aim of being a centre of excellence for the energy sector, boosting the local economy, attracting greater inward investment, delivering 3000 new jobs over its 25 year lifespan and providing an opportunity to secure the long term future of Blackpool Airport.

4.7 Following April 2016, initial work focused on securing approval of enabling funding of £1.6m by Blackpool Council and completion of the BAEZ Masterplan and Delivery Plan. The latter a requirement of a Memorandum of Understanding (MoU) between the LEP, DCLG, Blackpool Council and Fylde Borough Council, signed on 9 November 2016.²

4.8 In March 2017 Mott McDonald consultants were commissioned to produce the BAEZ Masterplan which was subject to public consultation during October to December 2017. On 5 February 2018 the Masterplan was approved by Blackpool Council's Executive and on the 7 February by Fylde Council Planning Committee. ([EL1.002e](#) refers).

4.9 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**

² MOU submitted to Examination Library

→ **Policies CS1:** Strategic Locations for Development; **CS3:** Economic Development and Employment and **CS24:** South Blackpool Employment Growth of the adopted Core Strategy (Refer paragraphs 4.3 and 4.4 above).

4.10 Proposed housing allocation HSA1.13 is included in the BAEZ Masterplan ([EL1.002e](#) and [EL1002d](#) refer). The inclusion of this allocation is considered to be enabling development in accordance with adopted Core Strategy Policy CS3 which states at paragraph 5.38 of the supporting text *'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'*.

4.11 The land receipts from the delivery of the housing site will contribute to the anticipated lifetime costs for enabling infrastructure and delivery at the BAEZ, in particular the new link road from Common Edge Rd. and other associated infrastructure, which will provide enhanced accessibility to the employment sites on the eastern side of the BAEZ.

4.12 The importance of the development of former playing field land at Common Edge Rd., (made available due to the relocation of some of the playing fields to land within the green belt south of Division Lane West), enables land receipts from the sale of the released land for additional employment plots and a housing site (document [EL1.002d](#) and Site Allocation [HAS1.13](#) refer) 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 2018.³

4.13 The June 2018 Executive report explains the Delivery Plan background, the basis on which it had been prepared, the likely level of outputs, the potential levels and timing of expenditure required to deliver the essential infrastructure, the estimated growth and timing in business rate income to support the expenditure, and to seek approval to an initial 3 year allocation of capital funding to ensure the overall objectives of the BAEZ are achieved.

4.14 The report highlighted the overall estimated lifetime cost of £72.0m (plus Prudential Borrowing costs funded at the prevailing treasury management pooled rate) for delivering BAEZ to its end date in 2041. The estimated capital cost for the first three years is £28.82m (plus Prudential Borrowing costs funded at the prevailing treasury management pooled rate) for the delivery of essential infrastructure and associated support for the three years 2018/19 to 2020/21. Paragraph 4.22 below highlights the progress made so far with the implementation of the BAEZ Masterplan.

³ Executive Report 18 June 2018 - Blackpool Airport Enterprise Zone: Delivery Plan 18 June 2018 – Submitted to the Examination Library

4.15 The report highlights that because much of the investment required to deliver the essential infrastructure to create the opportunities for business rate growth is inevitably required up front, in order to maximise the benefits, it is necessary for Blackpool Council, as accountable body to prudentially borrow against the future growth in order to ensure that it occurs and the benefits of investment and jobs are realised.

4.16 Genecon consultants were appointed to help produce the Delivery Plan. Infrastructure costs and potential business rates income were re-assessed building on the foundation of the Masterplan. These new projections were combined to form an Investment Plan for the Enterprise Zone that highlights expenditure requirements, revenue income from business rates and capital receipts from plot sales and any other funding sources (for example, Football Foundation grants).

4.17 The Masterplan approved in February 2018 ([EL1.002e refers](#)) was used to define the full potential of the Enterprise Zone to deliver floorspace from which job numbers, economic impacts and the revenue potential from business rates growth, together with related property transactions on land sales, has been more accurately estimated and the full extent of enabling infrastructure and its cost assessed.

4.18 Overall these revised estimates identify:

- an increased level of potential employment with approx. 5,000 additional jobs estimated.
- a cumulative Gross Valued Added total over the five years of £232m and £2.08bn over the Enterprise Zone lifetime.
- significantly increased infrastructure and delivery costs as the full extent of required infrastructure is understood, and additional elements including strategic land acquisitions and allowance for contributions to the cost of developing alternative operational airport infrastructure to release land for development have been included.
- higher potential income from retained business rates growth adjusted to allow for optimism bias on potential take up and displacement of firms locally.

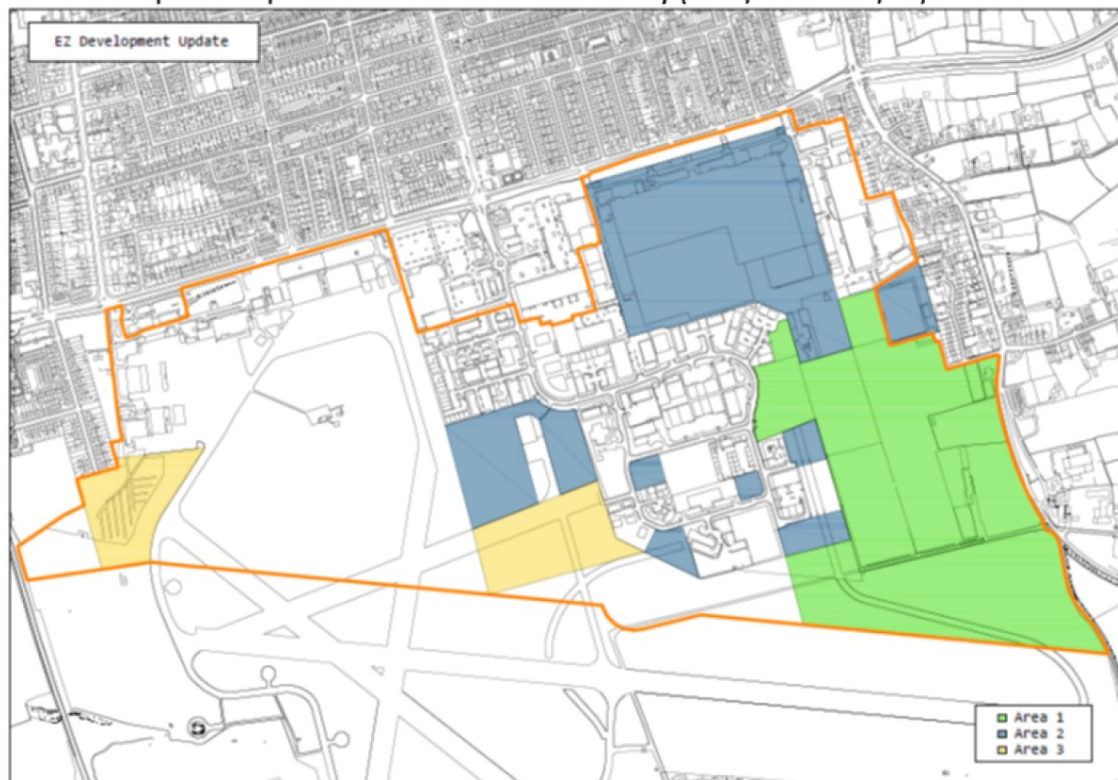
4.19 The Masterplan 2018 identified the key activities to progress the full implementation of the Enterprise Zone and it identified three broad time-related phases of infrastructure activity to open up development plots. Some elements will take several years to fully implement and for this reason, the first three years, which is the minimum level of commitment necessary to optimise early delivery, will involve various works some of which are preparatory for delivering benefits in later years.

4.20 At paragraph 5.14 the Executive report sets out the first 3 year (2018/19 to 2020/2021) commitments subject to all necessary approvals and includes:

- the relocation of existing Common Edge Sport pitches and provision of enhanced sporting facilities;
- a new housing site to be released and sold to private developers;
- a new access road and gateway entrance linking Common Edge Road to Amy Johnson Way, to relieve existing traffic congestion at the single point of entry to Blackpool Business Park and opening up large serviced development plots on the former Common Edge playing fields, providing development opportunity following completion of the ongoing local plan process which will inter alia release the land from its present greenbelt status;
- construction of the first of several bespoke design and build developments on the Common Edge site.

4.21 Paragraph 5.16 of the Executive Report states that the phasing of delivery over the first 3 years will be led by Council development/activity within Area 1 (shown in Green in Plan 1 below) and highlights that these areas lead delivery as they are the key to unlocking land and sites for disposal and hence revenue.

Plan 1 – Proposed Implementation - First 3 Years Only (2018/19 – 2020/21)



4.22 It needs to be emphasised that the BAEZ Delivery Plan is a live document which needs to respond to evolving circumstances and specific accommodation requirements. Hence an annual review of progress and expenditure on the Delivery Plan is required to appraise Blackpool Council Executive and the LEP, as the responsible bodies, of progress. In relation to this, the detail of the key elements of Phase 1 have evolved since the original 2018 timetable in response to the impact of the Covid pandemic; the need to realign the location of the new Eastern Gateway link road in response to detailed transport assessments; the subsequent need to acquire third party property; and the negotiations with third parties to secure the new sporting facilities. Notwithstanding the challenges, progress of the implementation of the BAEZ Masterplan continues apace and includes the following:

- **Relocation and enhancement of existing playing fields and sporting facilities.**
Permission was granted in August 2020 ([Application 20/0108](#) refers) for 12 new grass playing pitches located south of Division Lane West. This proposal has been implemented and the new playing fields are available for play October 2021. In addition permission has also been granted in August 2021 ([Application 20/0564](#) refers) for improved sports pitches and new changing facilities to the north of Division Lane West. Together both developments provide for a significant enhanced offer of playing field and sporting facilities with some £7m of investment increasing the playing field area from 99,600 sqm to 100,100 sqm.
- **Significant progress with the provision of the new link road and eastern gateway** to serve the Common Edge and core business park area, with property acquisitions in excess of £1m secured to enable junction improvements at the junction of Common Edge Rd and School Lane to facilitate the new Eastern Gateway link road for the BAEZ;
- **Detailed highway design is underway with the appointment of Wilde Consulting** - initial £330,000 contract. Outline planning application for the new highway works including a significant upgrade to Common Edge/Queensway, new junctions at School Road and for the Eastern Gateway access road expected to be submitted in late November 2021 following public engagement with local residents.
- **Architects and quantity surveyors engaged** by the EZ are presently progressing detailed design feasibility studies for the following enquiries :-
 - 75,000 sq.ft. floorplate Drinks and additives manufacture
 - 30,000 sq.ft. floorplate Chimney Engineering company
 - 25,000 sq.ft. floorplate spring manufacturer
 - 30,000 sq.ft. Floorplate Spring manufacturer (separate company)

The above to be accommodated on land to be released at Common Edge by the new highway. The intention being to progress construction in parallel with the construction

of the new Eastern Gateway access. All the enquiries being secured on the basis of reactive response to occupier need following generic marketing of the EZ.

- **Discussions are progressing with Electricity North West for the provision of a new Primary Sub-station** to be located at Common Edge – alongside the new Eastern Gateway access road.

Across the BAEZ

- **A new Transatlantic Telecommunications 48 pair fibre optic cable has been installed by Acquacomms** – which provides communication to the United States in less than 0.64 Milliseconds – making the EZ extremely attractive location for digital and data industries. An extensive local fast fibre network has been installed in the existing business park – and through the common Edge Playing fields in anticipation of future development – the cable ducting traversing Common Edge also includes the Trunk cabling used by ZAYO to connect to major exchanges in Manchester, London, Newcastle and onward to the Nordics and mainland Europe .
- **a total of 1803 gross jobs have been recorded on the EZ since commencement in April 2016 (circa 1400 net)**. The figure includes for FT Equivalent construction jobs;
- **more than 250 enquiries** including 7 current data centre requirements, a 75,000sq.ft requirement for a drink manufacturer; and three engineering companies for whom proposals are in preparation.
- **There have been a number of new developments completed** since the commencement of the EZ these include (but not exclusive to) :-
 - Blackpool and the Fylde College Energy HQ (30,000 SQ FT)
 - Dakota Court (20,000 sq.ft.) (4 units)
 - Enterprise Court (Planning consent for 64,000 sq.ft.) constructed circa 16,000 sq.ft.
 - ARC (20,000 sq.ft. (with an additional 14,000 sq.ft. planned)
 - Hunter House (20,000 sq.ft. two units)
 - Lockheed Court (circa 16,000 sq.ft. 5 units)
 - Multiply neXus Building -- (40,000 sq.ft.)
 - Acquacomms base station (1000 sq.ft.)

- **The total expenditure to date by the BAEZ is circa £21m.**

4.23 With the continued progress of the BAEZ the overarching key financial elements in term of the need for land receipts from Phase 1 to fund essential infrastructure remains crucial to delivering the objectives and outputs of the BAEZ.

Summary

4.24 As highlighted in the information above, the release of green belt within the BAEZ at Common Edge Rd. is fundamental to the delivery of the BAEZ, and the Council considers that exceptional circumstances therefore exist with respect to economic development in order to make a minor amendment to the Green Belt boundary at this location to accommodate Blackpool and the wider Fylde Coast's business and employment needs. With respect to exceptional circumstances and economic development, we would respectfully like to draw attention to the South Ribble Local Plan where the alteration to the green belt boundary was accepted in order to accommodate development in the Salmesbury Enterprise Zone ([CD2.26.1 - Inspectors South Ribble Final report June 2015.pdf](#) (southribble.gov.uk)).

The green belt evidence base

Blackpool Airport Enterprise Zone (BAEZ)

4.25 The Local Green Belt Review Assessment (November 2019) ([EB021](#) refers) highlights the green belt designation in the BAEZ, just north of Division Lane West, comprising some 13.93ha of Green Belt which includes land at South Shore Cricket, Squash and Rugby Club, Spirit of the Youth Football Club and a remediated waste lagoon associated with airport operations.

4.26 The green belt at this location appears to 'punch' into the existing urban area and is surrounded to the west and north by established business/industrial development and to the east by the B52619 (Common Edge Road), a key transport route between Blackpool and St Annes to the south, with fronting housing and a commercial garden centre (refer to Plan 2 below). This parcel of land is not considered to meet the specific purpose of the Green Belt as set out under paragraph 138 of NPPF21.

Plan 2 - Green Belt at the Blackpool Airport Enterprise Zone – aerial Image



Land at Faraday Way

4.27 The Local Green Belt Review Assessment (November 2019) (pages 21 to 31 of [EB021](#) refer) shows that the two locations for change to the boundary of the green belt at Faraday Way are better served in meeting green belt policy contained in NPPF, as the new boundaries as adjusted provide for the following:

(i) **Northern Area at Faraday Way**

The changes to the green belt boundary at Faraday Way northern area has resulted in a net gain of green belt designated land at this location of some

0.254 hectares. The amended boundary follows physical features on the ground in a way that the existing boundary does not;

(ii) **Southern Area at Faraday Way**

The changes to the green belt boundary at Faraday Way southern area has resulted in a net gain of green belt designated land at this location of some 0.142 hectares. The amended boundary following physical features on the ground in a way that the existing boundary does not;

4.28 The minor changes to the green belt boundary at Faraday Way do not compromise the purpose of the green belt as set out under paragraph 138 of NPPF. The changes correct anomalies and ensure the boundary accords with paragraph 143 of NPPF 2021, in particular point (f). While changes to the Green Belt should normally take place where exceptional circumstances have been demonstrated, the limited extent of these changes and the net gain of green belt overall of some 0.396 hectares in total at Faraday Way mean that they have no material impact on the function of the Green Belt at this location. They are only proposed to ensure that the boundary on the ground is consistent with the final bullet of paragraph 143 of the NPPF in that the amendments provide clearly define boundaries, using physical features that are readily recognisable and likely to be permanent.

4.29 In summary the green belt review evidence base shows that the changes to the green belt at the BAEZ and Faraday Way are better served in meeting green belt policy as contained in NPPF21 by the new boundaries as adjusted.

Issue (viii): Is the Council's approach to safeguarded land and compensatory improvements to the GB justified and consistent with national policy?

Questions:

1. Is the approach to safeguarded land in Policy SLA1 justified and consistent with national policy? Why is it necessary to identify an area of safeguarded land in order to meet longer-term development needs? Would the land identified in SLA1 meet longer-term development needs stretching well beyond the plan period? What specific development needs would it meet?

1.2 The minor changes to the Green Belt that are proposed at Faraday Way to correct anomalies and ensure the boundary accords with paragraph 143 of NPPF 2021, in particular point (f) have led to the need to safeguard the land identified in Policy SLA1. This is to ensure a plan-led approach is taken to any development that comes forward on the land.

1.3 Blackpool is intensely developed and has a tightly constrained boundary, which means there is a demonstrable lack of future development land. Opportunities for further housing and employment expansion within the Borough beyond the plan period are therefore extremely limited. It is therefore considered reasonable to identify this land to be safeguarded as it will potentially be required to meet development needs beyond the current plan period to 2027.

2. Does the SADMP make the status of the safeguarded land it identifies clear, in accordance with paragraph 143(d) of the NPPF?

2.1 Paragraph 143 of NPPF 2021 states '*When defining Green Belt boundaries, plans should:*

..... (d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;

2.2 Policy SLA1 is clear and states that development will not be permitted on the Safeguarded Land shown on the Policies Map until a review of the Local Plan is undertaken. The supporting text to the policy reiteration that land at Faraday Way between the existing urban area and the Green Belt is safeguarded for future development needs beyond the plan period. It refers to NPPF highlighting that planning permission for the permanent development of safeguarded land will only be granted following a Local Plan Review.

3. Does the SADMP adequately set out ways in which the impact of removing land from the GB (including safeguarded land) can be offset through compensatory improvements to the environmental quality and accessibility of the remaining GB land, and how such improvements could be secured?

3.1 Yes. With respect to compensatory improvements to the environmental quality and accessibility at the BAEZ, the Council considers that Policy DM8: Blackpool Enterprise Zone adequately sets out the requirements. Point 3d of the policy requires the enhancement of the existing playing fields; and point 5 requires a design framework to include landscaping, green infrastructure, sustainable urban drainage and incorporating cycle and pedestrian connectivity setting out the design principles for the site and taking into account the objectives of the Blackpool Green and Blue Infrastructure Strategy and Action Plan ([EB019](#) and [EB021](#) refer) .

3.2 In relation to point 3d of the policy DM8 and the enhancement of existing playing fields, planning application reference 20/0108 providing 12 new playing pitches within the Green Belt south of Division Lane West received permission in August 2020 and has been implemented. The new playing fields are available for play in October 2021. In addition permission has also been granted in August 2021 (Application 20/0564 refers) for improved sports pitches and new changing facilities to the north of the relocated pitches. Together both applications provide for an enhanced offer of playing field and sporting facilities at this location increasing the playing field area from 99,600 sqm. To 100,100 sqm.

3.3 With respect to the design framework, (point 5 of DM8 refers) Cassidy and Ashton consultants have been commissioned to assist in developing the framework and in addition an Expression of Interest has been submitted to the Design Code Pilot Phase 2 the outcome of which is awaited. Planning applications will have to adhere to the Design Framework when submitting proposals for development in the BAEZ.

3.4 With respect to land at Faraday Way, the proposed minor amendments to the Green Belt boundary result in a net gain in Green Belt in this location and this detailed in Section 4 of the Local Green Belt Review Assessment ([EB021](#)). Access to the Green Belt land at this location has not been compromised.