

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

**Matter 4: Are the sites allocated for housing and employment  
justified and deliverable?**

**Blackpool Council Statement**

November 2021



## 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](#)
- [Housing Topic Paper \(EB003\)](#)
- [Blackpool Local Plan Part 1: Core Strategy \(Adopted January 2016\) \(AD004\)](#)
- [Strategic Housing Land Availability Assessment Update 2019 \(EB004\)](#)
- [Local Plan Viability Assessment \(EB002\)](#)
- [Viability Practice Planning Guidance](#)
- [Deliverable Five Year Housing Land Supply Statement \(1 April 2021 – 31 March 2026\) \(EB005\)](#)
- [National Planning Policy Framework 2021](#)
- Housing supply and delivery' [Planning Practice Guidance](#)
- [Blackpool Open Space Assessment November 2019 \(EB0022\)](#)
- Letter of Comfort from Sport England ([EL004a](#))
- [Application 20/0810](#)
- [Application 20/0564](#)
- Employment Land Update Paper ([EB013](#))
- Blackpool Airport Enterprise Zone Masterplan 2018 ([EL.002e](#))
- [Blackpool Airport Enterprise Zone Masterplan Plan 2020 \(EL1.002d\)](#)
- Enterprise Partnership's Lancashire Advanced Manufacturing and Enterprise Cluster ([LAMEC](#)) programme
- 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 Employment Land Study 2013](#)
- Executive Report – Blackpool Airport Enterprise Zone: Delivery Plan 18 June 2018 (Submitted to the Examination Library)

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## **Matter 4: Are the sites allocated for housing and employment justified and deliverable?**

### Position of the Council regarding Matter 4

#### **Issue (ix): Is the SADMP's approach to the provision of housing justified and deliverable?**

#### Questions:

##### **1. Was the methodology used to assess and select the proposed site allocations appropriate? Were reasonable alternatives considered and tested? Are the reasons for selecting the preferred sites and rejecting others clear?**

1.1 The Council considers the methodology used to assess and select the proposed site allocations is appropriate. The approach taken to the identification of sites for housing allocations is set out in detail in Section 4 of the Housing Topic Paper ([EB003](#)).

1.2 The SHLAA is the key source of potential sites for the housing allocations in the SADMP. 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 ([EB004](#)) process to see to see whether they were still appropriate for inclusion as potential housing sites.

1.3 The sources of housing sites are set out in Table 3 (pages 17 and 18 refer) of the Housing Topic Paper. Alternatives were also considered and these are discussed in Section 4 of the Housing Topic Paper.

1.4 The reasons for selecting the preferred sites and rejecting others are clearly set out in Section 4 of the Housing Topic Paper. Paragraphs 4.42-4.47 specifically discuss the sites not proposed for allocation and the reasons why they were rejected. Furthermore, Appendix 4 identifies site suggestions received through the Call for Sites Process and highlights whether they are included or not and reasons why.

**2. Does Schedule 1 of the SADMP adequately identify site specific requirements such as infrastructure and mitigation? Are the key development considerations for each site allocated for housing set out in schedule 1 of the SADMP justified by evidence? Have site specific key development considerations and any site specific infrastructure and mitigation been appropriately considered in the Council’s viability assessment?**

2.1 The site proformas in Schedule 1 of the SADMP are considered to adequately identify requirements for infrastructure and mitigation within the ‘Highways Considerations’ and ‘Key Development Considerations’ sections. Furthermore, Section 5 of the Housing Topic Paper ([EB003](#)) discusses Transport Impact.

2.2 The sites have been assessed in terms of archaeological potential, ecology and highways and although additional ecological survey work and mitigation measures are likely to be required on some sites at planning application stage, these constraints should not prevent the development of housing on the sites, or mean that the site should not be allocated.

2.3 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.

2.4 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. The LPVA looked at a broad range of site typologies identified in Figures 7.2 and 7.3 of the Assessment which is an accepted methodology. The [Viability Planning Practice Guidance](#) confirms that it not necessary to viability test every site. Plan makers can use site typologies to determine viability at the plan making stage. It is not considered that more detailed assessments were necessary as Blackpool does not have any key sites on which delivery of plan particularly relies.

**3. To what extent would housing sites anticipated to come forward in the next five years be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years?**

3.1 The approach taken to the identification of sites for the housing allocations in HSA1 is set out in detail in Section 4 of the Housing Topic Paper ([EB003](#)). The Site Assessment section discusses availability, suitability and achievability at pages 22-26.

3.2 In terms of availability, the proposed housing allocations are all on sites that are considered to be available for development over the plan period. Six of the proposed allocations without permission are owned by private landowners/developers who have expressed an intention to develop, or sell, the site for housing over the course of the plan period. The other eight proposed allocations are on land that is owned and controlled by the Council, where housing development is actively being pursued.

3.3 The Council's current five year supply position is set out in the Deliverable Five Year Housing Land Supply Statement (Five Year Supply Paper) (1 April 2021 – 31 March 2026) ([EB005](#)).

3.4 The following site allocations in HSA1 are included within the current five year supply:

HSA1.2	HSA1.16
HSA1.6	HSA1.23
HSA1.13	HSA1.17
HSA1.14	HSA1.19
HSA1.15	HSA1.25

3.5 These have been identified in line with [NPPF](#) and the 'Housing supply and delivery' [Planning Practice Guidance](#) which states that to be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. NPPF advises that sites which do not involve major development and have outline planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years. Further detail on each site with respect to the above housing allocations can be found in Appendix 1 of the Five Year Supply Paper.

**4. For sites scheduled later in the plan period, are these in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged?**

4.1 The approach taken to the identification of sites for the housing allocations in HSA1 is set out in detail in Section 4 of the Housing Topic Paper ([EB003](#)). The Site Assessment section discusses availability, suitability and achievability at pages 22-26.

4.2 In terms of availability, all of the proposed housing allocations are on sites that are considered to be available for development over the plan period. Six of the proposed allocations without permission are owned by private landowners/developers who have expressed an intention to develop, or sell, the site for housing over the course of the plan period. The other eight proposed allocations are on land that is owned and controlled by the Council, where housing development is actively being pursued.

4.3 In terms of suitability, the proposed allocations scheduled later in the plan period are all on sites that are considered to be suitable for housing development. They are on sites located within the identified urban area, so are in conformity with the spatial strategy set out in [Core Strategy](#) Policy CS2.

4.4 Although the sites are subject to a variety of constraints, none have been identified that would prevent their development. They have been assessed in terms of archaeological potential, ecology and highways and although additional ecological survey work and mitigation measures are likely to be required on some sites at planning application stage, these constraints should not prevent the development of housing on the sites, or mean that the site should not be allocated.

4.5 For each pro-forma within Schedule 1, ([SD001](#) refers) there is a 'Housing Delivery' section which provides detail on site ownership and confirms the development will be delivered over the plan period.

**5. Is the loss of public open space associated with HSA1.2 and HSA1.5 justified and consistent with national policy as set out in paragraph 99 of the NPPF? Should mitigation measures be more clearly specified?**

5.1 With respect to site allocation HSA1.2, Schedule 1 recognises within the 'key development considerations' section that development of the open space within the site will require compensatory measures including the provision of improved quality meeting the required standards. It is also acknowledged that the public open space on the western section of the site is classified as poor quality in the Blackpool Open Space Assessment 2019 ([EB022](#) refers). Overall, open space provision in Greenlands ward exceeds the proposed Borough standard of 4ha per 1000 (5.45ha), as set out in this Assessment.

5.2 With respect to site allocation HSA1.5, Schedule 1 recognises within the 'key development considerations' section that parts of the sites are public open space. Overall, open space provision in Park ward exceeds the proposed Borough standard of 4ha per 1000 (5.79ha) as set out the 2019 Blackpool Open Space Assessment. The open space at Chepstow Road is classified as fair quality in this assessment and the open space at Bathurst

Avenue is classified as good. Development of any open space will require compensatory measures including the provision of improved quality meeting the required standards.

5.3 For both sites, it is clearly set identified in the Open Space Assessment that there is a surplus open space within the sites' respective wards which aligns with Paragraph 99(a) of [NPPF 2021](#) and that development of the site will require compensatory measures which aligns with Paragraph 99(b) of NPPF 2021.

5.4 It is not considered that mitigation measures should be more clearly specified. Schedule 1 provides a sufficient hook to secure mitigation through the development management process. The precise details of the mitigation could vary dependant on whether or not the public open space was to be lost and to what extent. For example, a current application for housing on site allocation HSA1.2 retains the public open space so mitigation is not required.

## 6. Should site HSA1.7 specify heritage mitigation measures?

6.1 With respect to site allocation HSA1.7, Schedule 1 recognises that the site is adjacent to the Town Centre Conservation Area and has been subject to a Heritage Impact Assessment which can be found in the Housing Topic Paper at Appendix 5 ([EB003](#)). The mitigation measures are set out in detail in the Heritage Impact Assessment.

6.2 Main Modification ref MainMod28 ([EL1.002b](#)) now requires that the development of the site should be carried out **in accordance with the heritage impact assessment which includes** to an appropriate height and design to enhance those views. This was the result of a representation received from Historic England.

6.3 Subject to the inclusion of MainMod28, it is not considered necessary for site HSA1.7 to specify heritage mitigation measures. The proposed modification provides a sufficient hook to secure mitigation, ensuring any development accords with the Heritage Impact Assessment.



**7. Is the loss of public open space associated with site HSA1.13 justified? Should mitigation measures be more clearly specified? Are exceptional circumstances fully evidenced to justify altering the Green Belt boundaries as proposed? Should Green Belt compensatory improvements be identified? What is envisaged the development of this site would enable for the BAEZ and how would such be secured?**

**Is the loss of public open space associated with site HSA1.13 justified?**

7.1 With respect to site allocation HSA1.13, Schedule 1 ([SD001](#) refers) recognises within the key development considerations that the site currently has designations including protected playing fields and public open space. The playing fields and football club will be relocated to the south as identified in the BAEZ masterplan ([EL1.002d](#) refers).

7.2 It is not considered that mitigation measures should be more clearly specified. Blackpool Council has worked closely with Sport England on the matter and the re-provision of sporting facilities is detailed in the Playing Pitch Strategy (PPS) Update Draft - December) 2020. Furthermore, a letter of comfort from Sport England ([EL1.004a](#)) confirms there are no outstanding issues with respect to the loss of playing fields issue.

7.3 In terms of the enhancement of existing playing fields, it is worth noting that permission was granted in May 2020 for the relocation of the existing playing fields ([Application 20/0810](#) refers). Permission has also been granted in August 2021 ([Application 20/0564](#) refers) for new changing facilities and social room to support the playing pitches at this location as well as a new 3G sports pitch, grass rugby pitch and training area, reconfiguration and extension to existing car park; improvement works to the access from Common Edge Road/Queensway including the creation of a new footway and cycleway and associated infrastructure and landscaping.

**Are exceptional circumstances fully evidenced to justify altering the Green Belt boundaries as proposed?**

7.4 Please refer to the response to Matter 3 Issue (vii) Question 4 which references the evidence to justify altering the green belt.

**Should Green Belt compensatory improvements be identified?**

7.5 With respect to compensatory improvements, the Council considers that these will be provided by the requirements of Policy DM8 point 3d which requires the enhancement of the existing playing fields; and point 5 which requires a design framework to include landscaping, green infrastructure, sustainable urban drainage and incorporating cycle and

pedestrian connectivity setting out the design principles for the site and taking into account the objectives of the Blackpool Green and Blue Infrastructure Strategy and Action Plan.

7.6 In relation to point 3d of 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.

**What is envisaged the development of this site would enable for the BAEZ and how would such be secured?**

7.7 The land receipt from the housing site is fundamental to the delivery of the BAEZ as a whole, as set out in the Council's response to Matter 3, Issue (vii) Q4. Land in the Enterprise Zone is owned by the Council and the receipts from the delivery of the housing on this site will contribute to the anticipated lifetime costs for enabling infrastructure and delivery. The importance of land receipts to underpinning the economic viability of the BAEZ is contained in 18 June 2018 Executive Report.<sup>1</sup>

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<sup>1</sup> Submitted to Examination Library - Executive Report – Blackpool Airport Enterprise Zone: Delivery Plan 18 June 2018

## **Issue (x): Is the SADMP's approach to the provision of employment justified and deliverable?**

### Questions:

#### **1. Is Policy DM8 seeking to allocate new employment land for development? If so, is this explicitly clear in the policy? Are the uses specified in the policy justified?**

1.1 The additional employment land to be allocated at the BAEZ is identified in policy DM7: Provision of Employment Land and Existing Employment Sites, with further explanation provided at paragraphs 3.3 and 3.4 of the Employment Land Update Paper ([EB013](#)). Policy DM8 is a criteria based policy to guide development to support the delivery of BAEZ.

1.2 It is considered that the uses specified in Policy DM8 in the policy are justified. The uses align with the uses set out in the Enterprise Zone Masterplan ([EL002e refers](#)) and with Policy EC4 - Blackpool Enterprise Zone in the Fylde Local Plan which was adopted October 2018. The BAEZ straddles the borough boundary with Fylde Borough Council therefore it is important to ensure that the policies in the both plans align to ensure the objectives of the BAEZ are delivered.

1.3 The target sector uses highlighted in point 3a of the policy link to the Lancashire Enterprise Partnership's Lancashire Advanced Manufacturing and Enterprise Cluster ([LAMEC](#)) programme. This programme comprises three Zones across four sites in Lancashire including BAEZ, collectively creating an investor offer of Northern Powerhouse significance capable of supporting 10,000 new jobs in the advanced engineering and manufacturing, energy and chemical sectors. In addition the target sectors were also considered in the Business Case (2015) and informed the inclusion of the Blackpool Airport Corridor in the Lancashire Enterprise Zone. (Section 3.0 refers).

1.4 Ancillary small scale uses of convenience retail and café/sandwich shop along with a day nursery, highlighted at point 3c, align with the aspiration of the Masterplan to serve the day to day needs of the business community across the EZ and their inclusion is considered reasonable and appropriate. Likewise the relocation of the existing grass playing pitches within the EZ boundary alongside enhancement of the sporting facilities also align with the Masterplan. It is worth noting that permission was granted in May 2020 for the relocation of the existing playing fields (Application 20/0810 refers). Permission has also been granted in August 2021 for new changing facilities and social room to support the playing pitches at this location as well as a new 3G sports pitch, grass rugby pitch and training area, reconfiguration and extension to existing car park; improvement works to the access from

Common Edge Road/Queensway including the creation of a new footway and cycleway and associated infrastructure and landscaping.

**2. Does Policy DM8 clearly set out the requirements for developers?**

**Are exceptional circumstances fully evidenced to justify altering the Green Belt boundaries as proposed at the BAEZ? Should Green Belt compensatory improvements be identified? Why is enabling housing required, what would it enable and how would such enabling be secured? Does the policy appropriately deal with biodiversity net gain?**

**Does Policy DM8 clearly set out the requirements for developers?**

2.1 It is considered that DM8 clearly sets out the requirements for developers in terms of the role and purpose of the Enterprise Zone; identifying the acceptable uses on the site; that other policy in the SADMP and Core Strategy will guide development where appropriate as will the EZ Masterplan, Design Framework and the Green and Blue Infrastructure and Action Plan. The Design Framework is currently in the process of being developed by Cassidy and Ashton Consultants. The policy is supported by further detail at paragraphs 3.93 to 3.97.

**Are exceptional circumstances fully evidenced to justify altering the Green Belt boundaries as proposed at the BAEZ?**

2.2 Exceptionally circumstances are fully evidenced in the Council's response to Matter 3, Issue (vii), Question 4.

2.3 The release of green belt is fundamental to the delivery of the Enterprise Zone. Taking account of the evidence provided in response to Matter 3, the Council considers that exceptional circumstances therefore arise with respect to economic development in order to make a minor amendment to the Green Belt boundary to accommodate Blackpool and indeed the wider Fylde Coast's business and employment needs. With respect to exceptional circumstance 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 \(southribble.gov.uk\)](#)).

**Should Green Belt compensatory improvements be identified?**

2.5 With respect to compensatory improvements, the Council considers that these will be provided by the requirements of Policy DM8. 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.

2.6 In relation to point 3d of policy DM8 and the enhancement of existing playing fields, planning application ref 20/0108 providing for 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 increasing the playing field area from 99,600sq.m to 100,100sq.m.

**Why is enabling housing required, what would it enable and how would such enabling be secured?**

2.7 Proposed housing allocation HSA1.13 is included in the BAEZ Masterplan (EL1.002d refers). It 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'*.

2.8 The land receipt from the housing site is fundamental to the delivery of the BAEZ as a whole, as set out in the Council's response to Matter 3, Issue (vii) Q.4. Land in the Enterprise Zone is owned by the Council and the receipts from the delivery of the housing on this site will contribute to the anticipated lifetime costs for enabling infrastructure and delivery. The importance of land receipts to underpinning the economic viability of the BAEZ is contained in 18 June 2018 Executive Report.<sup>2</sup>

**Does the policy appropriately deal with biodiversity net gain?**

2.9 It is considered that Policy DM8 appropriately deals with biodiversity net gain. Biodiversity net gain in the first instance is set out in Policy DM35 of the SADMP and this policy would need to be taken into account as appropriate in relation to development at the

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<sup>2</sup> Submitted to Examination Library - Executive Report – Blackpool Airport Enterprise Zone: Delivery Plan 18 June 2018

Enterprise Zone. Whilst it is not considered necessary to repeat issues that are covered by policy elsewhere in the plan, as the plan should be read as a whole, in response to a representation from the Environment Agency at Publication consultation stage, the Council has proposed [Main Modification 02](#) at point 5 of the policy. This main modification proposes a reference to the '**opportunities for biodiversity net gain**' in relation to the development of a Design Framework, to be included alongside reference to building, landscape, green infrastructure and sustainable urban drainage required by the policy.

### **3. Are the appropriate use classes set out in Policy DM7 justified and clear?**

3.1 It is considered that the appropriate use classes set out for each employment area identified in policy DM7 are clear and justified. The policy states that proposals for new development or redevelopment of existing premises will be permitted in accordance with the specified uses for each employment area. The table within the policy sets out the appropriate uses as defined by the current Use Class Order which are commonly understood.

3.2 The characteristics of the employment areas are reviewed in detail in Section 4 of [Blackpool Employment Land Study 2013](#) which formed part of the evidence base for the Core Strategy underpinning strategic policy CS3: Economic Development and Employment and informs the uses set out in Policy DM7.