BLACKPOOL LOCAL PLAN

PART 1: CORE STRATEGY

BLACKPOOL COUNCIL STATEMENT

MATTER 6

QUALITY OF DESIGN AND HERITAGE

APRIL 2015

CONTENTS

Matter 6 – Quality of Design and Heritage
(Policies CS7, CS8)
Participants: Blackpool BC

Introduction

This Statement has been produced by Blackpool Council to outline its response to the Matters and Questions raised by the Inspector for the Hearings into the Blackpool Local Plan Part 1: Core Strategy Development Plan Document (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 Core Strategy. To assist document numbers are referenced where appropriate.

Position of the Council regarding Matter 6

6.1   Is reference to the natural environment, biodiversity and ecological networks in policy CS7 necessary to the soundness of the plan?

6.1.1   The Council does not consider that reference to the natural environment, biodiversity and ecological networks in Policy CS7 is necessary to the soundness of the plan.

6.1.2   Policy CS7 sets out the design requirements for new development. The Council expects high quality, well designed developments that contribute positively to the character and appearance of the local, natural and built environment.

6.1.3   With respect to the natural environment, biodiversity and ecological networks, paragraph 5.119 of the supporting text to Policy CS7 specifically highlights that new development must provide adequate green infrastructure in conjunction with Policy CS6: Green Infrastructure. Policy CS6 sets out how green infrastructure will be protected, enhanced, created and connected, with all new development incorporating new or enhanced green infrastructure. Policies in the Core Strategy are to be read as a whole in conjunction with one another. It is considered that the natural environment, biodiversity and ecological networks are appropriately covered in Policy CS6 and that it is not necessary to repeat these issues in Policy CS7.

6.2   Is the plan based on adequate, up-to-date evidence about the historic environment, in line with paragraph 169 of the NPPF?

6.2.1   With respect to the historic environment, the Council considers the Core Strategy is based on adequate, up-to-date evidence, in line with paragraph 169 of the NPPF.

6.2.2   Paragraph 169 requires Local Planning Authorities to have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to their environment. They should also use it to predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

6.2.3   Policy CS8: Heritage has been informed by a robust and up-to-date evidence base including:
- Blackpool Heritage Characterisation Studies (2009)(EB021)
- Draft Built Heritage Strategy for Blackpool (2014)(EB020)

6.2.4   Nine Heritage Characterisation Studies (EB021) were carried out looking at various parts of the Borough:

- Town Centre
- Layton
- Central Promenade
- South Beach
- Raikes
- North Shore
- North Promenade
- Bloomfield
- Marton Moss

6.2.5   These studies, funded by English Heritage, assess the significance of the town's heritage assets and identify buildings which have a positive heritage character. They recommend that a number of buildings that should be 'locally listed' in recognition of their heritage value and contribution to the streetscene.   In response to this, the Council's Built Heritage Team has undertaken a project to 'locally list' a vast number of properties across the Borough, including within the Inner Area.   Details of these can be found at https://www.blackpool.gov.uk/Residents/Libraries-arts-and-heritage/Blackpool-heritage/Conservation-areas-and-listed-buildings/Locally-listed-buildings.aspx. The Council have also used the studies as a basis to review the current conservation areas and as a result have adopted two new conservation areas and extended the Town Centre Conservation Area.

6.3   Does the plan provide a positive strategy for the conservation and enjoyment of the historic environment in line with paragraph 126 of the NPPF?

6.3.1   The Core Strategy sets out a positive approach to the conservation and enjoyment of the historic environment in line with paragraph 126 of NPPF.

6.3.2   The importance of Blackpool's historic environment is recognised throughout the Plan (further discussed in the Council's response to Question 6.4). Embedded in Paragraph 126

of NPPF is Goal 1 Objective 5 which sets out the priority to create well-designed places for people to enjoy whilst conserving Blackpool's rich heritage which underpins the spatial vision. The objective is to be delivered through a number of policies in the plan as set out in Appendix C Table 1: Delivering the Core Strategy spatial vision, goals and objectives.

6.3.3   Policy CS8 provides the overarching strategic policy for development in relation to Heritage. The policy is positive and supports developments that conserves and enhances the historic environment, consistent with paragraph 126 of NPPF:

- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation is recognised in CS8 (2), supporting text at paragraph 5.124 and also Policy CS18: Winter Gardens

- The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring is recognised in CS8(1) and also Policy CS18 : Winter Gardens

- CS8(1) and (3) and also Policy CS12(1e) relate to the desirability of new development making a positive contribution to local character and distinctiveness;

- Opportunities to draw on the contribution made by the historic environment to the character of a place is inherent in policy CS8

6.3.4   As illustrated above, a key strand of the Core Strategy is to conserve and enhance the historic environment and this is summed in paragraph 5.129 of the Plan which states 'It is vital that Blackpool provides the quality desired by the modern visitor whilst cherishing and promoting the heritage assets, which have helped bring about the resorts' past success'.

6.3.5   In addition to the Core Strategy, the Council is actively pursuing a positive approach through the development of the Built Heritage Strategy and its actions and other conservation initiatives discussed in the response to question 6.2.

6.4   Do Chapters 2 and 3 of the plan underplay the value of the town's historic environment and is a more detailed, evidence-based assessment of, and vision/goals for, the historic environment necessary to the soundness of the plan?

6.4.1   Chapters 2 and 3 of the Core Strategy are not considered to underplay the value of the town's historic environment.

6.4.2   The importance of Blackpool's built heritage is recognised throughout the Core Strategy. Paragraph 2.4 of the overview of Chapter 2 - Spatial Portrait sets out the historical context and recognises Blackpool's high quality Victorian architecture including Blackpool Tower, the Winter Gardens and piers.

6.4.3   The Environment section of the Spatial Portrait (paragraph 2.23) recognises the town's 'rich social and built heritage which continues to maintain a national profile, including the iconic Blackpool Tower, Winter Gardens, Pleasure Beach and Piers'.

6.4.4   Built heritage is recognised as a key overarching issue at the end of the Spatial Portrait. Paragraph 2.37, bullet 6 again identifies Blackpool's key iconic resort building and structures are culturally rich in heritage which remain important to the Town's future.

6.4.5   Within Chapter 3 – Vision and Objectives, a key objective of the Core Strategy (Goal 1, Objective 5) is to 'create well designed places for people to enjoy with high quality buildings, streets and spaces, whilst conserving and enhancing Blackpool's rich heritage and natural environment'.

6.4.6   As illustrated above, the Council considers it has made an appropriate emphasis on the historic environment and recognises its importance throughout the plan and in various core strategy policies. It does in no way underplay the value of the historic environment.

6.4.7   NPPF states that Local Plans should be informed by a <u>proportionate</u> evidence base. The Council considers that evidence on Blackpool's historic environment is proportionate and in line with NPPF Paragraph 169. Details of the evidence base are set out in the Council's response to Question 6.2. A more detailed, evidence-based assessment of, and vision/goals for the historic environment is therefore not necessary to the soundness of the plan.

6.5   **Is policy CS8 appropriate as a Core Strategy policy? Should it more specifically refer to Blackpool's particular historic heritage features or is that the role of Development Management policies?**

6.5.1   Policy CS8 is appropriate as a Core Strategy policy and provides the strategic policy framework in relation to heritage.

6.5.2   In providing the overarching strategic policy, it is not considered necessary to specifically refer to Blackpool's particular heritage features in detail. An overview of Blackpool's heritage assets is set out in the policy's supporting text at paragraphs 5.121 - 5.123.

6.5.3   Further detailed Development Management policies can be found within the current adopted Local Plan (AD007). Policies LQ9 'Listed Buildings' and LQ10 'Conservation Areas' will continue to be saved once the Core Strategy is adopted. These policies will be updated as part of the Local Plan Part 2: Site Allocations and Development Management Policies Document.

6.6   Is it sufficiently clear how policy CS8 will be applied in the light of the emerging Built Heritage Strategy?

6.6.1   The Built Heritage Strategy provides a detailed plan prepared by Council with regards to the historic environment. It looks at the heritage assets of Blackpool and sets out a plan for monitoring, protecting and managing them over the next six years.

6.6.2   The Strategy aims to:

- Bring about and understanding of the significance of Blackpool's built heritage in a local, regional and national context and to create a framework of protection for these important assets.
- Bring about a general awareness of the meaning of 'heritage asset' in the context of the Strategy and to affirm the Council's commitment to protecting existing and potential assets that together comprise the built heritage of the town.
- Promote a general awareness of legislation, planning policy and the important responsibilities and roles of owners, the local authority and national bodies and organisations in built heritage matters.
- To promote active community participation in heritage issues and to encourage local groups already involved in heritage to offer practical support in delivering the objectives of the strategy by working in partnership with the Council and other agencies.

6.6.3   A number of themes are identified within the Strategy. Theme 1 'Protecting and conserving built heritage' is relevant to planning and deals with the protection, management and enhancement of heritage buildings and how best to protect them from inappropriate development and aligns with Policy CS8 of the Core Strategy.

6.6.4   The Built Heritage Strategy does not affect the application of Core Strategy policy CS8. It complements the policy with the Actions aligning to the Core Strategy and National Policy.

6.6.5   Proposed Modification MM015 provides further clarification on the Built Heritage Strategy in the supporting text to CS8.

6.7   Are the detailed wording changes proposed in MM012, MM013 and MM020 appropriate and necessary to the soundness of the plan?

6.7.1   Minor modifications MM012, MM013 and MM020 enable the wording of policies CS8 and CS12 to more appropriately align with Section 12 of the National Planning Policy Framework and responds to representations received from English Heritage.

6.8   Is policy CS8 (5) (even as proposed to be modified by MM014) effective? Should the policy's clauses (1) – (4) be modified to take account of/refer to the local heritage assets?

6.8.1   Part 5 of the policy (as amended by MM014) refers to the Council's local list of heritage assets reflecting a commitment by the Council to protect locally important buildings, structure and parks of historic value. The protection of these identified locally important building will be delivered through parts 1-4 of policy CS8**.**

6.8.2   It is not considered that any modifications are required to parts 1-4 of policy in relation to Locally Listed Buildings.   These would apply to all heritage assets whether they are designated or non-designated.   A detailed Development Management Policy relating to Locally Listed Buildings will be prepared as part of the Local Plan Part 2: Site Allocations and Development Management Policies Document.

6.9   Does the plan provide adequate guidance on the role and the conservation/enhancement of the Tower and the piers?

6.9.1   The Core Strategy provides the strategic policy approach in relation to heritage. It is not considered appropriate at this stage to go into detail regarding specific heritage assets. The supporting text to CS8 highlights the importance of these assets in paragraphs 5.121-5.123.

6.9.2   Further detailed Development Management policy can be found within the current adopted Local Plan (AD007). Policy LQ9 'Listed Buildings' (which will continue to be saved once the Core Strategy is adopted) applies to development proposed for the Tower and North Pier (the only listed pier).   This policy will be updated as part of the Local Plan Part 2: Site Allocations and Development Management Policies. We will continue to work closely with the Council's Built Heritage Team in developing policies for Part 2 of the Local Plan.

6.10   Is reference to the historic environment in other policies of the plan necessary to its soundness – in particular CS6, CS10, CS11, CS12, CS16 and CS21?

6.10.1 It is not considered necessary to make reference to the historic environment in other policies of the plan. The policies of the Core Strategy are not read in isolation. A variety of policies can apply to a particular proposal. It is considered unnecessary repetition to make reference to the historic environment in all of the policies identified.