# Strategic Environmental Assessment For

# The Marton Moss Neighbourhood Plan

Environmental Report to accompany Regulation 16 Neighbourhood Plan

July 2022

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# 1. Non-Technical Summary

# 1.1 What is strategic environmental assessment?

A strategic environmental assessment has been undertaken to inform the Marton Moss Neighbourhood Plan (MNP). This process is required by the SEA Regulations. Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability / environmental objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental and socioeconomic effects through the Neighbourhood Plan and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

# What is the Marton Moss Neighbourhood Plan?

The MNP presents a plan covering the designated Marton Moss Neighbourhood area for the period 2020-2030. Prepared to be in general conformity with the Blackpool Core Strategy (Local Plan Part 1) and having regard to the emerging Blackpool Local Plan Part 2, it sets out a vision and a range of policies for the Neighbourhood Plan area. These relate to a range of topics, including, but not limited to, housing, open space, recreation, and community amenities.

# Purpose of the Environmental Report

This Environmental Report, accompanies the Regulation 16 of the MNP. It is the second iteration of the SEA Environmental Report (previous version was produced to accompany the Regulation 14 draft of the MNP). The first document was the SEA Scoping Report (May 2021), which includes information about the Neighbourhood Plan area's environment and community.

The purpose of the Environmental Report is to:

- Identify, describe and evaluate the likely significant effects of the MNP and alternatives; and
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

#### The Environmental Report contains:

- An outline of the contents and main objectives of the MNP and its relationship with other relevant policies, plans and programmes;
- Relevant aspects of the current and future state of the environment and key sustainability / environmental issues;
- The SEA Framework of objectives against which the MNP has been assessed;
- The appraisal of alternative approaches for the MNP;
- The likely significant environmental effects of the MNP;

- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the MNP; and
- Potential monitoring measures.

# Scoping

The scoping stage involves the collection of information relating to:

- the state of the environment in the plan area; and
- relevant objectives and targets set out within plans, policies and programmes.

This information allowed for a range of key issues to be identified, and to establish what topics should be the focus of the SEA. The scoping process led to the following topics being scoped in or out of the SEA. These topics then formed the basis of a SEA Framework, which is the basis for appraising the Plan (and reasonable alternatives).

- Air Quality Scoped out
- Biodiversity Scoped in
- Climatic factors; adaptation and resilience Scoped in
- Historic environment Scoped in
- Landscape Scoped in
- Land, soil and water resources –Scoped out
- Population and housing Scoped in
- Health and wellbeing Scoped out
- Transportation Scoped out

# Assessment of alternative approaches for the MNP

The NP proposes to allocate 21 sites for housing development. The MNP Forum identified a range of site options, the majority of which, were then appraised as part of the site selection process in the Site Options and Assessment document (SOA). The highest performing / ranking sites selected for allocation are listed below followed by sites considered suitable for allocation subject to appropriate mitigation.

**Table 1-1 Highest performing housing sites** 

SOA Site	MNP Site	O'. N	Indicative
reference	reference	Site Name	capacity <sup>1</sup>
MM13	Н	Carandaw Farm, School Road, Blackpool, FY4 5EJ	3 - 6
MM14a	Q	The Hollies/Dean Nurseries, Chapel Road, Blackpool, FY4 5HU	1
MM14b	Р	The Hollies/Dean Nurseries, Chapel Road, Blackpool, FY4 5HU	6
MM16	N	Plot of Land, was "Marina Nurs", New Hall Avenue	2
MM17b	0	Former Baguleys Site, Midgeland Road	5
MM18	G	442 Midgeland Road	5 - 8
MM20	D	Land at Sandy Lane	2
MM21	F	Land north of Worthington Road	1
MM22	I	Land at School Road	1
MM23	J	Land west of St Nicholas Road	2
MM24	L	Fishers Lane, Marton Moss	2
MM26	С	Land off School Road, near Common Edge Rd junction	7-11
MM27	Е	Land to the South of Worthington Road	1
MM30	U	Land on corner of Jubilee Lane N and Stockydale Road	2
MM31	Т	Land to the East of Jubilee Lane N	3
	The followi	ng sites were assessed as suitable subject to approp	riate mitigation
MM5	S	Runnell Farm, Chapel Road, Blackpool	15
MM10	R	1 Runnell Villas, Chapel Road, Blackpool	2
MM19	В	Common Edge Road (B)	4
	Additional sit	es identified in the Reg. 14 Consultation	
-	V	Grazing Land Jubilee Lane North	1
-	W	41 Stockydale Rd	2
-	Х	Amarella school Rd	4
	Total dwelling	gs (suitable sites + suitable with mitigation)	71-81

 $<sup>^{\</sup>rm 1}$  Capacity figures from MNP policy MM4.

#### Assessment of the MNP

The plan is predicted to have positive effects for all five SEA topics. The main benefits of the Plan relate to population and housing, as the plan seeks to deliver quality designed, new homes at a level that substantially exceeds the indicative housing requirement figure for the NP area.

The Plan also scores positively with respect to Landscape and the historic environment due to the inclusion of policies seeking to protect the landscape character, heritage assets, archaeology and the Marton Moss Conservation Area.

The high growth alternative scores less well when compared to the MNP; scoring significant negatives on biodiversity, the historic environment and landscape, primarily due to development on sites within Major Open Land and sites of high archaeological potential. It also performs less well in terms of effects on climate change. However, significant positive effects are predicted with respect to population and housing as this option has the potential to meet and exceed the locally assessed housing need for Marton Moss.

Table 1-2 Appraisal of reasonable alternatives

	Biodiversity	Climate change	Historic Environment	Landscape	Population and housing
MNP	Minor positive	Minor positive	Minor positive	Minor positive	Significant positive
High growth Alternative	Significant negative	Minor negative	Significant Negative	Significant negative	Significant positive

#### Recommendations

Through the SEA process, a number of recommendations are revealed to enhance the positive effects of the plan and mitigate any negatives. The first iteration of the SEA (accompanying the Regulation 14 draft MNP) made the following recommendations:

- The inclusion of a requirement to the investigation archaeological potential and take appropriate protective action.
- To include the requirement for an ecological survey of site considered for redevelopment in policy MM6 to avoid potential harm to established biodiversity.

Both of the above recommendations are now implemented in the Regulation 16 MNP through additions to policies MM1 and MM6 and there are no further recommendations.

#### Monitoring

There is a requirement to present measures that could be used to monitor the effects of the Plan identified through the SEA. It is anticipated that monitoring of effects of the

Neighbourhood Plan will be undertaken by Blackpool Council as part of the process of preparing its Annual Monitoring Report (AMR).

The SEA has not identified any potential for significant negative effects that would require closer monitoring.

Significant positive effects have been predicted, and it is important to monitor these to track whether or not they arise in practice. This allows for remedial action to be taken should the positive effects not occur as anticipated.

**Table 1-3 Monitoring of significant effects** 

Significant Effects	Proposed monitoring measures
Population and housing	Monitor annual net housing completions
Significant positive	Monitor affordable housing delivery

#### 2. Introduction

# 2.1 Background

AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Marton Moss Neighbourhood Plan (MNP).

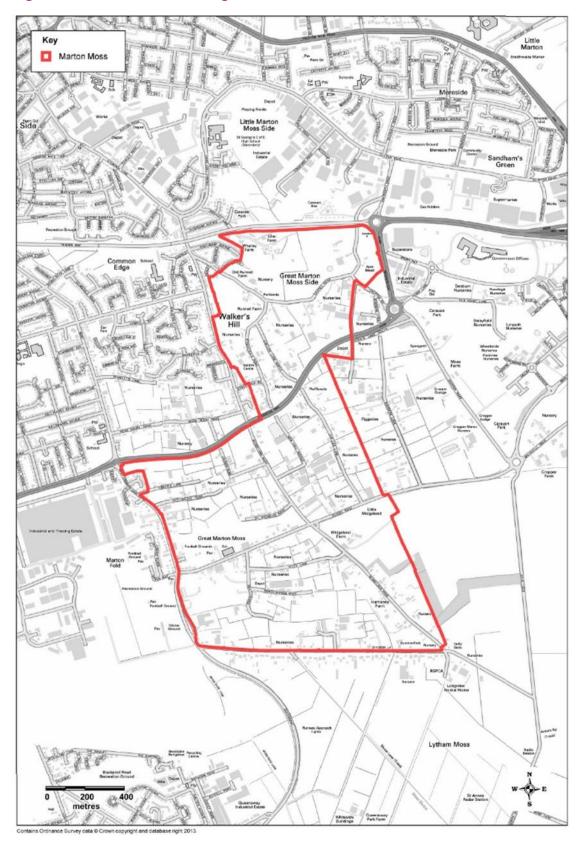
The Neighbourhood Plan area covers the designated Marton Moss Neighbourhood area (Figure 2.1) and is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2012. The NP is being prepared in general conformity with the Blackpool Core Strategy (Local Plan Part 1) and having regard to the emerging Blackpool Local Plan Part 2.

A Regulation 14 Consultation on the draft Plan concluded in April 2022. A HRA Screening Report was produced by Arcadis in November 2020 which concluded that no significant effects are likely. However Natural England subsequently concluded in writing to Blackpool Council 'We disagree with the conclusions of the Habitats Regulation Assessment (HRA) of no likely significant effect' and asked for an additional assessment to be carried out as part of the HRA process. The need for HRA (appropriate assessment) triggers a full SEA according to Regulation 5 (3) of the SEA Regulations. The findings of the SEA process are set out in this Environmental report (ER). Key information relating to the MNP is presented in **Table 2.1.** 

Table 2.1: Key facts relating to the Marton Moss Neighbourhood Plan

Name of Qualifying Body	Marton Moss Neighbourhood Forum
Title of Plan	Marton Moss Neighbourhood Plan (MNP)
Subject	Neighbourhood planning
Purpose	Marton Moss Neighbourhood Plan is being prepared as a Neighbourhood Development Plan under the Neighbourhood Planning (General) Regulations 2012.  The MNP is being prepared in general conformity with the Blackpool Core Strategy (Local Plan Part 1) and having regard to the emerging Blackpool Local Plan Part 2.
Timescale	2020 – 2030
Area covered by the plan	The MNP will be used to guide and shape development within the designated Marton Moss NP area.
Summary of content	The MNP will set out a vision, strategy and range of policies for the Neighbourhood Plan area.
Plan contact point	Stephen Woodhouse, Email: chairman@martonmossforum.org

Figure 2-1 Marton Moss Neighbourhood Plan Area



# 2.2 SEA explained

SEA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and reasonable alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding or mitigating negative environmental effects and maximising positive effects. Through this approach, the SEA for the MNP seeks to maximise the emerging Neighbourhood Plan's contribution to sustainable development.

The SEA has been prepared in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive<sup>2</sup>.

The SEA Regulations require that a report is published for consultation alongside the draft plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.

In line with the SEA Regulations this Environmental Report must essentially answer four questions:

- What is the scope of the SEA?
- What has plan-making/SEA involved up to this point?
- 'Reasonable alternatives' must have been appraised for the plan.
- What are the appraisal findings at this stage?
- i.e. in relation to the draft plan.
- What happens next?

These questions are derived from Schedule 2 of the SEA Regulations, which present 'the information to be provided within the report'. **Table 2.2** presents the linkages between the regulatory requirements and the four SEA questions.

<sup>&</sup>lt;sup>2</sup> Directive 2001/42/EC

# 2.3 Structure of this Environmental Report

This document is the Environmental Report for the MNP and hence needs to answer all four of the questions listed above with a view to providing the information required by the SEA Regulations.

Each of the four questions is answered in turn within this report, as follows:

Table 2.2: Questions that must be answered by the Environmental Report in order to meet regulatory<sup>3</sup> requirements

Environmental Report question		In line with the SEA Regulations, the report must include <sup>4</sup>
	What is the plan seeking to achieve?	<ul> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
	What is the sustainability 'context'?	<ul> <li>The relevant environmental protection objectives, established at international or national level</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
What's the scope of the SEA?	What is the environmental 'baseline'?	<ul> <li>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> <li>The environmental characteristics of areas likely to be significantly affected</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
	What are the key issues & objectives?	Key problems/issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment

<sup>&</sup>lt;sup>3</sup> Environmental Assessment of Plans and Programmes Regulations 2004

<sup>&</sup>lt;sup>4</sup> NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

Environmental Report question	In line with the SEA Regulations, the report must include <sup>4</sup>	
What has plan-making/SEA involved up to this point?	<ul> <li>Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>The likely significant effects associated with alternatives</li> <li>Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the draft plan.</li> </ul>	
What are the assessment findings at this stage?	<ul> <li>The likely significant effects associated with the draft plan</li> <li>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan</li> </ul>	
What happens next?	The next steps for plan making/SEA process.	

#### 3. Local Plan context and vision for the MNP

#### 3.1 Local Plan context for the MNP

The Marton Moss NP Forum took the decision to prepare a Neighbourhood Plan to enable the local community to influence the shape of development in their area. The NP Forum felt that if development was going to have to happen in Marton Moss, then its residents deserved the opportunity to say what this development should look like and to be involved in shaping the future of the area in which they live.

The NP Forum has been able to incorporate into the Neighbourhood Plan, the views, opinions and aspirations of residents and businesses in Marton Moss.

The Marton Moss NP area is within Blackpool Council (BC) and will therefore be required to be in general conformity with the adopted Blackpool Core Strategy (Local Plan Part 1) and also having regard to the emerging Blackpool Local Plan Part 2 (BLP2). Following examination in 2021, BC is currently consultation on the proposed Main Modifications (27 July to 7 September 2022).

Marton Moss is identified in the Blackpool Local Plan as an area where a neighbourhood planning approach will be followed (BLP1 Policy CS26). The policy states that the character of the remaining lands at Marton Moss is integral to the local distinctiveness of Blackpool and as such is valued by the local community. A neighbourhood planning approach will be promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character, whilst identifying in what circumstances development including residential may be acceptable. The policy will remain in place until neighbourhood policies which support the retention and enhancement of the distinctive character of the area are developed through the Marton Moss Neighbourhood Plan. Therefore, until the NP is 'made', Policy CS26 restricts residential development in Marton Moss.

The Neighbourhood Forum considers that additional housing should be provided to meet general housing need arising in the neighbourhood area. The BLP does not set a statutory housing requirement for Marton Moss, and therefore the Neighbourhood Forum is not obliged to allocate sites in the Neighbourhood Plan. However, as the Forum intends to identify sites for residential development, Blackpool Council has indicated that the neighbourhood area's share of the borough's housing requirement looking ahead to 2030 would be 28 dwellings

# 3.2 Vision for the Marton Moss Neighbourhood Plan

The vision for the MNP, which was developed during earlier stages of plan development, is as follows:

#### Table 3-1 Vision of the MNP:

The Forum's view of what Marton Moss will be like by 2030:

Marton Moss has stayed mainly open and green in appearance with well-maintained public spaces and attractive main thoroughfares. It is a place that is easy to walk, cycle and horse ride through in safety on well connected-up signed routes and off-road paths that provide for healthy recreation. Midgeland Farmhouse and its associated original buildings are partially retained and land nearby is a community park popular with local people.

The housing built over the 2020 – 2030 period has been in keeping with the character of the Moss and provides accommodation for a range of needs. The other significant buildings constructed over the Plan period are also well designed and respectful of the area. The development provided is well adapted to climate change by having minimal impact, including in terms of greenhouse gas emissions and energy use. The natural environment is home to a wider range of wildlife than it was in 2020. The area is now well drained with a very low risk of flooding.

To support the Neighbourhood Plan's mission statement, the MNP sets out a number of Neighbourhood Plan policies. The latest iteration of these policies has been appraised in Chapter 5 of this Environmental Report.

# 4. The Scope of the SEA

# 4.1 SEA Scoping Report

The SEA Regulations require that: "When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the `consultation bodies". In England, the consultation bodies are Natural England, the Environment Agency and Historic England.<sup>5</sup> These authorities were consulted on the scope of the MNP SEA for a 5 week period commencing the 1<sup>st</sup> June 2021.

The purpose of scoping was to outline the 'scope' of the SEA through setting out:

- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
- Baseline data against which the Neighbourhood Plan can be assessed;
- The key sustainability / environmental issues for the Neighbourhood Plan; and
- An 'SEA Framework' of objectives against which the Neighbourhood Plan can be assessed.

All three statutory consultees provided a formal response to the Scoping Report within the five week consultation period. The comments received and how they have been considered and addressed, are presented in **Table 4.1** below.

<sup>&</sup>lt;sup>5</sup> In-line with Article 6(3).of the SEA Directive, these consultation bodies were selected because 'by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programme'.

#### Table 4-1: Consultation responses received on the SEA Scoping Report

# Consultation response

# How the response was considered and addressed

# Environment Agency

Emphasised the need to consider improving / enhancing the environment through a minimum 10% biodiversity net gain. The EA recommended that opportunities to enhance ecological networks to achieve biodiversity net gains (para. 3.5.3 of the SEA scoping report) is investigated further with particular regard to understanding opportunities in relation to net gains for the aquatic environment.

The EA response also emphasised the importance of considering the impact of climate change on future flood risk, adding that a sequential approach should be taken when allocating sites for development. Areas currently benefitting from flood defences could be at risk in the future if defences are not improved to take account of climate change.

Both of the above issues (part of the SEA scoping report) have been taken into consideration in the preparation of the SEA.

# Natural England

The response referred to NE's response to the initial SEA and HRA carried out by Arcadis.

AECOM has since completed a new HRA, the findings of which (along with the NE's initial response to previous SEA/HRA) are taken into account in this SEA process.

# Historic England

The response did not highlight specific issues but referred to Historic England Advice Note 8 for guidance;

<a href="https://historicengland.org.uk/images-">https://historicengland.org.uk/images-</a>

books/publications/sustainability-appraisal-and-strategicenvironmental-assessment-advice-note-8/> . The guidance has informed the SEA process.

# 4.2 Key sustainability / environmental issues

The full Scoping Report is attached as **Appendix A** to this report. This section sets out a summary of the key issues that were identified through scoping.

Drawing on the review of the policy context and baseline information, the SEA Scoping Report was able to identify a range of sustainability / environmental issues that should be a particular focus of SEA. These issues are as follows, presented through eight environmental themes:

The selected environmental themes incorporate the 'SEA topics' suggested by Annex I(f) of the SEA Directive<sup>6</sup>. These were refined to reflect a broad understanding of the anticipated scope of plan effects (drawing from the screening opinion and local knowledge).

The scoping process allowed for some sustainability topics to be 'scoped out'; as it was considered the Plan is unlikely to have significant effects on certain factors.

#### 4.2.1 Air quality

- There are no Air Quality Management Areas within the Neighbourhood Plan Area and no exceedance of the national air quality objectives has been reported here.
- Whilst additional development in the NP area has the potential to increase vehicular emissions, the scale of the development proposed in the NP is such that it is unlikely to have a significant effect on air quality.

#### Scoped out

#### 4.2.2 Biodiversity

- There are several international, national and local designated biodiversity sites in the vicinity of the NP area, including;
- The Marton Mere SSSI, the Ribble Estuary SSSI and the Lytham St. Anne's Dunes SSSI.
- The Liverpool Bay and the Ribble and Alt Estuaries SPAs
- Ribble and Alt Estuaries Ramsar
- Ribble estuary National Nature Reserve
- Marton Mere Local Nature Reserve.

#### Scoped in

#### 4.2.3 Climatic factors

 Mitigation of and adaptation to climate change are national and local priorities that the NP should seek to contribute towards. However, the MNP has limited scope to address Climate Change Mitigation.

<sup>&</sup>lt;sup>6</sup> The SEA Directive is 'of a procedural nature' (para 9 of the Directive preamble) and does not set out to prescribe particular issues that should and should not be a focus, beyond requiring a focus on 'the environment, **including on issues such as** biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors' [our emphasis]

• Whilst the MDP area falls predominantly within flood zone 1, there are some areas of flood zone 2 and 3 to east and centre of the plan area.

Climate Change mitigation Scoped out

Climate Change adaptation Scoped in

#### 4.2.4 Historic environment

- The MNP area contains two Grade II listed buildings and ten locally listed heritage assets. The majority (around two thirds) of the NP area is within the Marton Moss Conservation Area. These could be affected by policies and proposals within the plan (either positively or negatively).
- An inappropriate approach that does not seek to conserve and enhance heritage assets could result in the erosion of the townscape quality.
- There is potential for significant effects upon the setting of heritage assets and the character of the built and natural environment.

#### Scoped in

#### 4.2.5 Landscape

• There is potential for future development to impose significant effects upon the character of landscapes and the open setting of the area.

#### Scoped in

#### 4.2.6 Land, soil and water resources

- The topic of land, soil and water resources has been scoped out, as the Plan is unlikely to have a significant effect on soil / agricultural land and water quality.
- There are important soil resources in the Plan area that ought to be avoided as much as possible. However, the total loss of land is unlikely to exceed 10 ha (given the scale of growth likely to be involved in any site allocations), and so a significant effect upon soil resources is considered unlikely in any event.
- Higher quality agricultural land should be protected, and such principles will need to be addressed through the site assessment process.
- It is unlikely that significant effects upon water quality would occur as a result of
  the plan as the scale of growth is not major, and changes to land use would not
  be anticipated to increase nitrate pollution. With regards to waste water
  treatment and drainage, the scale of growth would not be expected to cause
  issues. For these reasons, soil, water and waste are scoped out.

Soil - Scoped out

Water - Scoped out

Waste - Scoped out

#### 4.2.7 Population and community

 Population trends in the MNP area show an ageing population with the proportion of the 65 plus age groups rising rapidly and 0-15 and 25-44 groups declining. Given the large proportion of older residents in the NDP area, it is likely that population may flatline as younger age-groups decline. Conversely, the substantial growth in the proportion of 65+ age group is likely to engender a need for specialist housing and smaller dwellings, better suited to older residents' needs.

#### Scoped in

#### 4.2.8 Health and Wellbeing

The Plan has the potential to engender effects on health and wellbeing, as
development on allocated sites could lead to benefits with regards to affordable
housing access, or negatives in terms of amenity disturbance. However, given
the small scale of development proposed within the draft MNP; this is unlikely to
produce significant effects on health and wellbeing.

#### Scoped out

#### 4.2.9 Transportation

• New development is likely to result in higher amounts of traffic and congestion on the local road network. A greater local population through the delivery of new housing and consequent demand for public transport could provide opportunities to increase bus provision. However, Marton Moss is unlikely to experience the scale of growth that would be likely to add significant congestion to the local road network or make major improvements to public transport viable.

#### Scoped out

#### 4.3 SEA Framework

The SEA framework has been established through the identification of key issues and environmental objectives as part of the scoping exercise. This draws upon the baseline position and policy context that has been prepared for a range of SEA topics.

The framework consists of a set of headline objectives and ancillary questions, which has been used to appraise the environmental effects of the draft Plan (and any reasonable alternatives).

Table 4.2 below outlines the full SEA Framework, which focuses on those issues that have been identified as the most important to consider in the preparation of the Plan; but acknowledging the limited influence that the Plan can/will have in some areas.

These issues were subsequently translated into an 'SEA Framework', which provides a methodological framework for the appraisal of likely significant effects on the baseline.

Table 4-2: SEA Framework for the Marton Moss Neighbourhood Plan

OF A Objective	Comments and the second	
SEA Objective	Supporting questions (Will the option/proposal help to)	
	<ul> <li>Support connectivity between habitats in the Plan area?</li> </ul>	
1. Biodiversity: Protect, maintain and enhance biodiversity habitats and species; achieving a net environmental gain and stronger ecological networks.	<ul> <li>Avoid significant impacts on designated sites in the vicinity of the NP area including; the Marton Mere, Ribble Estuary and Lytham St Anne's Dunes SSSIs?</li> </ul>	
	<ul> <li>Support continued improvements to the designated sites in and around the NP area?</li> </ul>	
	Achieve a net gain in biodiversity?	
	• Support access to, interpretation and understanding of biodiversity?	
	<ul> <li>Increase the resilience of biodiversity in the NP area to the effects of climate change?</li> </ul>	

### **SEA Objective**

### Supporting questions (Will the option/proposal help to...)

### Climate Change Adaptation:

Avoid and manage flood risk and support the resilience of the Marton Moss Neighbourhood Plan area to the potential effects of climate change.

- Improve green infrastructure networks in the plan area to support adaptation to the potential effects of climate change?
- Sustainably manage surface water run-off, ensuring that the risk of flooding is not increased (either within the plan area or downstream) and where possible reduce flood risk?
- Ensure the potential risks associated with climate change are considered through new development in the plan area?
- Avoid placing development in areas that are at the greatest risk of flooding.

# 3. Historic Environment:

Protect, enhance and manage the integrity, distinctive character and setting of heritage assets and the wider built environment

- Conserve and better reveal the significance of and enhance heritage assets, their setting and the wider historic environment?
- Contribute to better management of heritage assets?
- Identify and protect/ enhance features of local importance?
- Support access to, interpretation and understanding of the historic environment?
- Consider the impact on setting in a manner proportionate to the significance of the heritage asset affected.
- Promote heritage-led regeneration?'
- Lead to the repair and adaptive re-use of a heritage asset and encourage high quality design?
- Protect and enhance the Marton Moss Conservation Area.

SEA Objective	Supporting questions (Will the option/proposal help to)
	Conserve, better reveal the significance of and enhance landscape assets?
4. <b>Landscape:</b> Protect, enhance	Contribute to better management of landscape assets?
and manage the distinctive character	Identify and protect/ enhance features of local importance?
and appearance of landscapes.	Support access to, interpretation and understanding of the surrounding landscape?
	Improve linkages to open space and the countryside?
5. Population and Housing: Provide everyone with the opportunity to live in good quality, affordable housing which meets the needs of occupiers throughout their lives.	<ul> <li>Support the provision of a responsive range of house types and sizes to meet identified needs of all community groups?</li> <li>Support the provision of affordable housing in the NP area?</li> <li>Create sustainable new communities with good access to a range of local services and facilities?</li> </ul>
6. Health and Wellbeing: Protect and improve the health and wellbeing of residents by enhancing the quality and accessibility of open space, facilities for recreation and health.	<ul> <li>Promote accessibility to a range of leisure, health and community facilities, for all age groups?</li> <li>Provide and enhance the provision of community access to green infrastructure, in accordance with Accessible Natural Greenspace Standards?</li> <li>Promote healthy and active lifestyles?</li> </ul>

# 5. What has plan making / SEA involved to this point?

#### 5.1 Introduction

In accordance with the SEA Regulations the Environmental Report must include:

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.

The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, this section explains how preparation of the current version of the MNP has been informed by an assessment of alternative site options.

### 5.2 Overview of plan making / SEA work undertaken

The MNP Forum has gathered a range of evidence, and undertaken consultation with communities and other key stakeholders to identify the issues and opportunities that need to be addressed in the Neighbourhood Plan.

The SEA process is being delivered by AECOM as part of the Locality Technical Support Programme.

The first step in the SEA Process was the development of a Scoping Report, which was published for Statutory Consultation in May 2021.

AECOM worked alongside the MNP Forum to identify and appraise any reasonable alternatives, to ensure that the SEA helps to inform the approaches and policies within the draft Plan.

The Regulation 14 consultation on the draft MNP (accompanied by the SEA) was completed on the 19<sup>th</sup> April 2022. Subsequently a revised Regulation 16 MNP was produced and shared with AECOM. This SEA environmental report appraises the Regulation 16 Plan 'as a whole', taking into account each of the individual policies in combination. As part of this process, it is important to consider 'reasonable alternatives'.

# 5.3 Assessment of reasonable alternatives for the Neighbourhood Plan

A key element of the SEA process is the appraisal of 'reasonable alternatives' for the MNP. The SEA Regulations<sup>7</sup> are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of

<sup>&</sup>lt;sup>7</sup> Environmental Assessment of Plans and Programmes Regulations 2004

the 'plan and reasonable alternatives taking into account the objectives and geographical scope of the plan'.

The following sections therefore describe how the SEA process to date has informed the development strategy for the Neighbourhood Plan area. Specifically, this chapter explains how the MNP's plan policies relating to housing and site allocations have been dealt with in the SEA.

#### 5.3.1 Housing Strategy

Overall District level housing numbers (targets) are primarily the responsibility of the Local Planning Authority; Blackpool Council (BC). The Neighbourhood Plan policies and site allocations must be in accordance with the strategic policies of the adopted Local Plan and have regard for policies of the emerging Local Plan.

The currently adopted Local Plan is the Blackpool Core Strategy. Policy C26 (Marton Moss); states that a neighbourhood planning approach will be promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character, whilst identifying in what circumstances development including residential may be acceptable. The policy will remain in place until neighbourhood policies which support the retention and enhancement of the distinctive character of the area are developed through the Marton Moss Neighbourhood Plan. Therefore, until NP is 'made', Policy CS26 restricts residential development in Marton Moss. However, the MNP Forum intends to identify sites for residential development.

Blackpool Council has indicated that the neighbourhood area's share of the borough's housing requirement would be 28 dwellings (over the MNP period). However, this does not take account of any completions that have already taken place at Marton Moss over the earlier years in the Core Strategy plan period. There have been 83 completions at Runnell Farm, which is located in the Neighbourhood Area, as well as a small number of other completions elsewhere. If taken into account in the Marton Moss Neighbourhood Plan, these completions exceed what would be required under the Core Strategy, apportioned to Marton Moss.

On a local level; a Housing Needs Assessment (HNA) for Marton Moss was prepared by AECOM in January 2020. The HNA does not provide a total housing need figure for Marton Moss (as this has been provided by Blackpool Council). However, it did estimate a need for 4.7 affordable dwellings per annum (dpa) equating to 47 units over MNP period. It also concluded that there is substantial need for affordable housing in the MNP area on the basis of Marton Moss's share of Blackpool's need, particularly for social/affordable rent. The assessment noted that it will be important to maximise the provision of new affordable homes, in line with Blackpool's Local Plan, when new housing developments are delivered in the NP area. In practice the number of new homes delivered in the NA over the plan period is likely to be limited given Blackpool's indicative requirement of 28 homes. Furthermore, if new homes are delivered on small sites (e.g. as infill developments) they may fall below affordable housing thresholds. The HNA also assessed a potential need for 31-51 dwellings by end of the plan period to

meet the needs of older people. With respect to younger residents and families the HNA identified around 51 newly forming households, adding that 'the neighbourhood planners may wish to consider policies which support these newly forming households and allow them to access suitable and affordable accommodation, particularly given the ageing of the population in Marton Moss and the decline in the number and proportion of younger households'.

#### Are there any other reasonable alternatives?

The MNP envisages a capacity to deliver up to 81 new homes, on sites proposed to be allocated, to meet some of the locally identified needs.

In terms of housing numbers; the potential alternatives identified are as follows:

- 1- Not to provide any additional housing at neighbourhood level as the indicative housing requirement figure of 28 dwellings, provided by Blackpool Council, has already been met and exceeded through new completions since the start of the adopted Local Plan (Core Strategy 2012-2027).
- 2- To allocate the MNP's identifiable capacity for up to 81 new homes to contribute to the strategic housing targets and fulfil locally assessed need. This level of growth corresponds to the estimated total capacity of the sites assessed to be suitable for residential development in the NP area.
- 3- To pursue a higher growth strategy; by allocating more housing through the MNP to meet more of the locally assessed need (in the HNA) and to enable delivery of more affordable homes and older persons housing.

The adopted BLP Core Strategy does not allocate sites for housing development within Marton Moss, leaving this to the remit of the MNP (once made). However, given the HNA's findings, the option of not providing any further housing (alternative 1) would not promote sustainability in Marton Moss and is therefore not considered to be reasonable. This leaves two alternatives to be tested through the SEA; the NP envisaged growth capacity of up to 81 new dwellings and a higher growth level that would go further toward meeting the assessed demand. Given the HNA's findings with respect to the lack of affordable housing and the need for new dwellings suited for older residents and newly forming households, pursuing a higher growth rate seems a reasonable alternative to test.

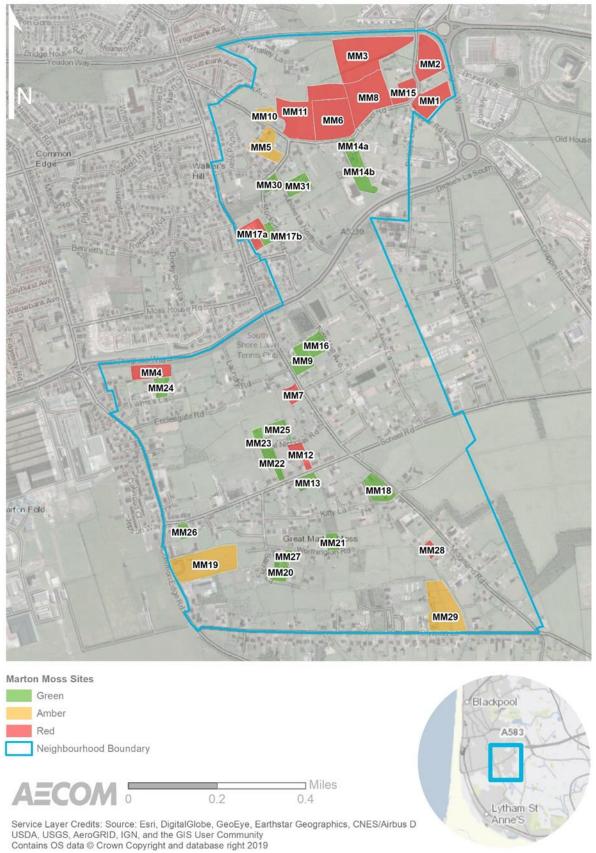
In conclusion two reasonable alternatives have been considered:

- 1. The draft MNP's proposed level of housing growth.
- 2. A higher growth alternative which allocates a greater amount of housing development.

#### 5.3.2 Site allocations

A key starting point is the Site Options and Assessment (SOA, 2020), which examines 33 sites, classifying the suitability of each for development on a three point (redamber-green) scale.

Figure 5-1 RAG rating of all the Marton Moss Sites assessed in the SOA.



#### 5.3.3 Site assessment methodology

#### Identifying sites

The first task was to identify which sites should be considered as part of the assessment. This included sites assessed in the Blackpool Strategic Housing Land Availability Assessment (SHLAA), prepared in 2014 to support the Local Plan, and sites identified through the Marton Moss Call for Sites, conducted by the MNP Forum between late 2019 and early 2020. The conclusions reached by the Local Planning Authority Sites in the SHLAA were reviewed to ensure that they were appropriate to be carried forward to the Neighbourhood Plan site assessment. New sites identified through the Call for Sites and the regulation 14 consultation process were appraised using AECOM's site assessment pro-forma.

#### Gathering information for site assessments

A site appraisal pro-forma was developed by AECOM to assess potential sites for allocation in the MNP. It is based on the Government's National Planning Practice Guidance, the Site Assessment for Neighbourhood Plans: A Toolkit for Neighbourhood Planners (Locality, 2015)<sup>8</sup> and the knowledge and experience gained through previous Neighbourhood Planning site assessments. The pro-forma enabled a consistent evaluation of each site against an objective set of criteria. The pro-forma recorded a range of information such as location, context, planning history, type of site (greenfield/brownfield), community facilities/ services and suitability with respect to environmental, heritage and other constraints. To avoid duplication, the SEA process has made use of the broader site assessments, as the criteria are appropriate with regards to the SEA Framework.

#### Assessment results

The site pro-formas were completed through a combination of desk top assessment and site visits. A 'traffic light' rating of all sites was given based on whether the site is an appropriate candidate to be considered for allocation in the Neighbourhood Plan. The traffic light rating indicates 'green' for sites that show no constraints and are appropriate as site allocations, 'amber' for sites which are potentially suitable if issues can be resolved and 'red' for sites which are not currently suitable. The judgement on each site is based on the three 'tests' of whether a site is appropriate for allocation – i.e. the site is suitable, available and achievable.

#### Indicative housing capacities

If landowners/developers have put forward a housing figure, this has been used if appropriate. If a site has been granted planning permission but the site has not yet been started or completed, then this capacity figure has been used. Where there are no estimated figures provided or where the proposed figure is considered inappropriate, an indicative capacity has been calculated, taking into account the net

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<sup>&</sup>lt;sup>8</sup> The Site Assessment for Neighbourhood Plans: A Toolkit for Neighbourhood Planners

developable area of the site and any identified constraints. In accordance with the recommendations in the Marton Moss Neighbourhood Plan Design Code, the indicative capacity is based on an assumed density of 8 dph for all sites within the Marton Moss Conservation Area, and 15 dph for sites outside the Conservation Area. Where sites are considered unsuitable for residential development, no indicative capacity is provided.

#### 5.3.4 Summary of Site Appraisals

In all, 33 sites were assessed, all of which were submitted to MNP Call for sites consultation. The Blackpool SHLAA assessed two sites within the MNP designated area, both of which have planning permission which has been implemented, therefore these were not assessed as they were no longer available for development. The assessment concluded that 17 sites are suitable for development and 4 sites are potentially suitable subject to mitigation of identified constraints. The remaining sites were considered unsuitable for development.

The results of the assessment are shown in Figure 5.1. and Table 5.1. The 'traffic light' rating for each site, indicates whether the site is appropriate for proposing for allocation. Red indicates the site is not appropriate for allocation, green indicates the site is appropriate for allocation and amber indicates the site is less sustainable or may be appropriate for allocation through the Neighbourhood Plan if certain issues can be resolved or constraints mitigated.

Following the Regulation 14 consultation in April 2022, four additional sites were identified and assessed by the MNP Forum, these are also included in Table 5.1 (sites V, W, X and the Stan's Mowers site)

Of the sites identified in Table 5.1, sites MM9, MM25 and MM29 (shown crossed out in Table 5.1) were discounted at the Reg. 14 consultation stage due to flooding concerns expressed by United Utilities and the Environment Agency. Of the newly identified sites, the Stan's Mowers site was discounted following the Environment Agency's advice that the site is entirely within a flood zone 2.

Table 5-1 Suitable/ Potentially suitable sites

MNP site reference (SOA Site reference) & RAG rating	Site address	Indicative capacity <sup>9</sup>	
M (MM9)	Field between 231-245 Midgeland Road	2	
H (MM13)	Caradaw Farm, School Road	3-6	
Q (MM14a)	The Hollies/Dean Nurseries, Chapel Road	1	
P (MM14b)	Dean Nurseries, Chapel Road	6	
N (MM16)	Plot of Land, was "Marina Nurs", New Hall Avenue	2	
O (MM17b)	Former Baguleys Site, Midgeland Road	5	
G (MM18)	442 Midgeland Road	5-8	
D (MM20)	Land at Sandy Lane	2	
F (MM21)	Land north of Worthington Road	1	
I (MM22)	Land at School Road	1	
J (MM23)	Land west of St Nicholas Road	2	
L (MM24)	Adjacent to 9 Fishers Lane	2	
<del>K (MM25)</del>	Land off St Nicholas Rd	1	
C (MM26) <sup>10</sup>	Land off School Road, near Common Edge Rd junction	7-11	
E (MM27)	Adjacent to Lemmington House, Worthington Road	1	
U (MM30)	Land on corner of Jubilee Lane N and Adjacent to 58 Stockydale Road	2	
T (MM31)	Adjacent to Moss Lodge, east of Jubilee Lane N	3	
	Total capacity on suitable sites : 43-53 dwellin		
S (MM5)	Runnell Farm, off Magnolia way	15	
R (MM10)	Adjacent to 1 Runnell Villas, Chapel Road	2	
B (MM19)	Adjacent to 322 Common Edge Road	4	
A (MM29)	Land North of Division Lane	4	
	Total capacity on potentially suitable sites :	21 dwellings	

 $<sup>^{\</sup>rm 9}$  from MNP Policy MM4  $^{\rm 10}$  Includes additional site suggested to MNP through the Reg. 14 consultation process.

MNP site reference (SOA Site reference) & RAG rating	Site address	Indicative capacity <sup>9</sup>		
	Total capacity on all sites :	64-74 dwellings		
	New sites from the Reg 14 consultation (not assessed in the SoA)			
V	Grazing Land Jubilee Lane North	1		
W	41 Stockydale Rd.	2		
X	Amarella Rd.	4		
Stan's Mowers <sup>11</sup>	New Hall Avenue	1		
	Total capacity of sites of new sites identified following Reg. 14 consultation.	7		
	Total capacity all sites above	71-81		

The higher growth alternative necessitates allocating more of the sites considered through the AECOM sites assessment. These were rated red, therefore, for the purposes of assessing the reasonable alternative of allocating a higher level of growth, it is necessary to revisit the list of sites assessed and include those sites for further consideration (Table 5.2). As these additional sites are not allocated in the MNP there are no MNP references for them, therefore, we have given them new site references beginning with SEA. This also serves to avoid confusion with the MNP policy numbers which also start with MM.

Of the sites in Table 5.2, SEA7 is in entirely within a flood zone 2, SEA12 is not available for development (part of the site has extant planning permission for a residential traveller caravan site) and SEA17a has planning permission and therefore not appropriate for allocation in the MNP. This leaves 9 red rated sites that can be included (on top of the green and amber sites) as part of the high growth alternative. These additional sites total around 13.25 ha in area or approximately 214 additional dwellings<sup>12</sup>.

<sup>&</sup>lt;sup>11</sup> The site suggestion was published at the Regulation 14 stage but was confirmed as being wholly within a flood zone 2 by the EA hence its Red rating.

<sup>&</sup>lt;sup>12</sup> Based on the Marton Moss NP Design Codes which recommends a density of 8 dwellings per hectare within the conservation area and 15 dph outside the conservation area.

Table 5-2 List of potential additional sites for the high growth alternative

SOA Site reference/ SEA ref. & RAG rating	Site address	Area ha	Indicative capacity
MM1/ SEA1	Land on north side of Cropper Road, Blackpool	1.1	16
MM2/SEA2	Land on east side of Chapel Road (south of Yeadon Way), Blackpool	1.28	19
MM3/SEA3	Land on west side of Chapel Road (south of Yeadon Way), Blackpool	2.76	41
MM4/SEA4	Land at Progress Way, Blackpool	0.8	30
MM6/SEA6	Land (east) at Runnell Farm, Chapel Road, Blackpool	2	30
MM7 SEA7	334-336 Midgeland Road, Blackpool, FY4 5HZ (CA)	0.4	NA
MM8/SEA8	Field on Chapel Road, Blackpool	2.05	31
	Land (west) at Runnell Farm, Chapel Road, Blackpool	2.4	36
MM12/SEA12	Land adjacent to "Derryn", School Road, Marton Moss, Blackpool, FY4 5EL (CA)	0.39	NA
MM15/SEA15	Corner Plot (Adjacent to Rose Villa) Chapel Road, Marton, Blackpool, FY4 5HU	0.63	9
MM17a/SEA17 a	Former Baguleys Site, Midgeland Road 0.69		NA
	Land to the rear of Harrisons farm, Midgeland Road (CA)	0.23	2
	Total capacity on available sites :	13.25	214 dwellings

Table 5.3 below summarises the housing numbers and sites required for each of the two alternatives considered;

**Table 5-3 Summary of Alternatives** 

Alternative	Rationale	Growth	Sites involved (MNP ref. / SEA ref.)
1. Proposed plan approach	Reflects community consultation and outcomes of the site assessment.	71-81 dwellings in total	H, Q, P, N, O, G, D, F, I, J, L, C, E, U, T, S, R, B, V, W, X
2. Additional site allocations (High growth)	This approach seeks to deliver a greater proportion of assessed housing need through the NP.	Up to 214 additional dwellings or up to 295 in total, utilising some of the sites assessed as less suitable (rated Red in the SOA)	All the above in addition to:  SEA1, SEA2, SEA3, SEA4, SEA6, SEA8, SEA11, SEA15

#### **Table 5-4 Site assessment summary table**

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
MM1 (SEA1)	Land on north side of Cropper Road, Blackpool	1.1 ha	N/A	<ul> <li>Greenfield site, currently used as a grazing field.</li> <li>Site falls within the Marton Mere SSSI Impact Zone for residential planning.</li> <li>Suitable access along Chapel Road</li> <li>Not within flood zone 2 or 3.</li> <li>Entirely within area identified as Major Open Land.</li> <li>Some loss of agricultural land (Grade 3).</li> <li>No impact on heritage assets.</li> <li>Potential noise and air pollution from A5320.</li> <li>Site does not relate well (in terms of scale and character) to the settlement of Marton Moss.</li> <li>Relatively open site with limited surrounding development.</li> <li>The site is considered unsuitable for development. While it is relatively free of environmental and physical constraints, it is poorly located for local services and development of the site has the potential to alter the existing open, rural character</li> </ul>	

<sup>&</sup>lt;sup>13</sup> These are the site references allocated in the SOA along with the MNP site reference (where site has been allocated in the MNP) and we have used the SEA reference (see table 5.1) where there is no site reference in the MNP (site not allocated for development)

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
				of the surrounding area. The site is entirely within an open area of land identified in the Neighbourhood Plan Major Open Land Study and development would have a significant negative impact on the openness of this part of the neighbourhood area.	
MM2 (SEA2)	Land on east side of Chapel Road (south of Yeadon Way), Blackpool	1.28 ha	N/A	<ul> <li>Site is a greenfield site, currently used as a grazing field.</li> <li>Site falls within the Marton Mere SSSI Impact Zone for residential planning.</li> <li>Suitable access along Chapel Road</li> <li>Not within flood zone 2 or 3.</li> <li>Entirely within area identified as Major Open Land.</li> <li>Some loss of agricultural land (Grade 3).</li> <li>No impact on heritage assets.</li> <li>Site does not relate well to the settlement of Marton Moss.</li> <li>Relatively open site with limited surrounding development.</li> <li>The site is considered unsuitable for development. While it is relatively free of environmental and physical constraints, it is poorly located for local services and development of the site has the potential to alter the existing open, rural character of the surrounding area. The site is entirely within an open area of land identified in the Neighbourhood Plan Major Open Land Study and development would have a significant negative impact on the openness of this part of the neighbourhood area.</li> </ul>	

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
MM3 (SEA3)	Land on west side of Chapel Road (south of Yeadon Way), Blackpool	2.76 ha	N/A	<ul> <li>Greenfield site, currently used as a grazing field.</li> <li>Site falls within the Marton Mere SSSI Impact Zone for residential planning.</li> <li>Suitable access along Chapel Road</li> <li>Not within flood zone 2 or 3.</li> <li>Entirely within area identified as Major Open Land.</li> <li>Some loss of agricultural land (Grade 3).</li> <li>High archaeological potential.</li> <li>Potential noise and air pollution from Yeadon Way which is elevated to the north of the site.</li> <li>Site is crossed by a public footpath.</li> <li>High voltage power lines cross site.</li> <li>Site does not relate well to the settlement of Marton Moss.</li> <li>Relatively open site with limited surrounding development.</li> <li>The site is considered unsuitable for development. While it is relatively free of environmental and physical constraints, it is poorly located for local services and development of the site has the potential to alter the existing open, rural character of the surrounding area. The site is entirely within an open area of land identified in</li> </ul>	

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
				the Neighbourhood Plan Major Open Land Study and development would have a significant negative impact on the openness of this part of the neighbourhood area.	
MM4	Land at	0.8	N/A	Small greenfield site, currently overgrown grazing land.	
(SEA4)	Progress Way, Blackpool	ha		Site falls within the Lytham St Anne's Dunes SSSI Impact Zone for residential planning.	
				Currently no suitable access, however owner states that access is possible through new traffic lights on Progress Way at Redwood Point.	
				Not within flood zone 2 or 3.	
				Low landscape sensitivity.	
				No loss of agricultural land.	
				No impact on heritage assets.	
				Potential air quality and noise issues due to proximity to Progress Way.	
				Site relates fairly well to the existing residential area.	
				The site is not considered suitable due to the lack of suitable access. However, if this could be overcome through discussions with the highways authority, this could result in the site becoming potentially suitable for development.	

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
MM5 (S)	Runnell Farm, Chapel Road, Blackpool	1 ha	6	<ul> <li>Site is a mixed site, currently occupied by a barn and storage units and partially used for grazing.</li> <li>Suitable access from the new residential estate on Magnolia Way. Access from Chapel Road or Stockydale Road is narrow.</li> <li>Not within flood zone 2 or 3.</li> <li>BAP Priority Habitat covers part of site.</li> <li>Low landscape sensitivity.</li> <li>Some loss of agricultural land (Grade 3).</li> <li>High archaeological potential.</li> <li>Site is adjacent to new residential development (Magnolia Point)</li> <li>The site is considered potentially suitable, although development of the whole site has the potential to negatively affect the character of Marton Moss, as well has having negative effects on the priority habitat in the northern part of the site adjacent to Chapel Road. Development of a smaller portion of the site could minimise these impacts, particularly if it were limited to the southern part of the site (approx. 0.5 ha, adjacent to Stockydale Road) which connects to the adjacent residential estate.</li> </ul>	

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
				Although access could be established from Stockydale Road or Chapel Road, these are narrow roads and are unlikely to be able to support a significant amount of development. It is therefore considered more appropriate for access to be established from Magnolia Way in the recently completed residential estate to the west.	
MM6 (SEA6)	Land (east) at Runnell Farm, Chapel Road, Blackpool	2 ha	N/A	<ul> <li>Greenfield site, currently used as a grazing field.</li> <li>Site falls within the Marton Mere SSSI Impact Zone for residential planning.</li> <li>Existing access unsuitable.</li> <li>Not within flood zone 2 or 3.</li> <li>Biological Heritage Site (hedgerow) on southern edge of site.</li> <li>Entirely within area identified as Major Open Land.</li> <li>Some loss of agricultural land (Grade 3).</li> <li>High archaeological potential</li> <li>Site is not well related to existing residential development.</li> <li>Relatively open site with limited surrounding development.</li> <li>The site is considered unsuitable for development. Although it has few constraints, it is entirely within an open area of land identified in the Neighbourhood Plan Major Open Land Study and development would have a significant negative impact on</li> </ul>	

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
				openness. Development has the potential to significantly alter the character of this part of the neighbourhood area and may represent an unsympathetic expansion of the existing residential area. Access is also a possible constraint, since the existing field access is close to a sharp bend, and the hedgerow on the southern edge of the site is a Biological Heritage Site which would limit opportunities to establish alternative access.	
MM7 (SEA7)	334-336 Midgeland Road, Blackpool, FY4 5HZ	0.4 ha	2	<ul> <li>Small greenfield site currently used as a paddock and stables.</li> <li>Suitable access along Midgeland Road.</li> <li>Site lies within flood zone 2.</li> <li>Low landscape sensitivity.</li> <li>No loss of agricultural land.</li> <li>Some potential impact on historic environment, as the site lies within Marton Moss Conservation Area.</li> <li>Site relates fairly well to the existing residential area.</li> <li>Overall, the site is considered unsuitable for development as it is entirely in flood zone 2, where development should be avoided unless the sequential test has been met.</li> </ul>	

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
MM8 (SEA8)	Field on Chapel Road, Blackpool	2.05 ha	N/A	<ul> <li>Greenfield site, currently used as a grazing field.</li> <li>Site falls within the Marton Mere SSSI Impact Zone for residential planning.</li> <li>Suitable access along Chapel Road</li> <li>Not within flood zone 2 or 3.</li> <li>Entirely within area identified as Major Open Land.</li> <li>Site includes a pond with ecological potential.</li> <li>Some loss of agricultural land (Grade 3).</li> <li>High archaeological potential.</li> <li>Site is not well-related to the existing residential area.</li> <li>Relatively open site with limited surrounding development.</li> <li>The site is considered unsuitable for development. Although it has few constraints, it lies entirely within open area of land identified in the Major Open Land Study and recommended for protection through the Neighbourhood Plan. Development of the site has the potential to significantly alter the character of this part of the neighbourhood area and may represent an unsympathetic expansion of the existing residential area.</li> </ul>	

MM9 (M)	Field	0.8	5	Site is a small greenfield site, currently used as a paddock.	
(.,,)	between 231 – 245	ha		Suitable access along Midgeland Road.	
	Midgeland Road,			Site lies partially within flood zone 2, however if small scale development occurred, this part of the site could be avoided.	
	Blackpool			Low landscape sensitivity.	
				No loss of agricultural land.	
					Some potential impact on historic environment, as the site lies within Marton Moss Conservation Area.
				Site relates well to the existing residential area.	
			fl. p. R. w. R. U. lie	Overall, the site is considered suitable for infill development, subject to mitigation of flood risk. However, development of the whole site may result in an out of character pattern of development given the linear nature of the housing along Midgeland Road. It may therefore be more appropriate for development to be limited to the western half of the site fronting the road.	
				Regulation 14 Consultation update: Updated	
				United Utilities (UU) and the Environment Agency (EA) advised that most of the site lies within flood zone 2 – therefore the site is no longer considered suitable for allocation in the MNP.	

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
MM10 (R)	1 Runnell Villas, Chapel Road, Blackpool	0.4 ha	1-2	<ul> <li>Currently in use as a garden for adjacent residential property.</li> <li>Site falls within the Marton Mere SSSI Impact Zone for residential planning.</li> <li>Potential to create new access directly onto Chapel Road, or to widen existing driveway serving adjacent residential property.</li> <li>Not within flood zone 2 or 3.</li> <li>BAP Priority Habitat covers part of site.</li> <li>Low landscape sensitivity.</li> <li>Site is entirely within area identified as Major Open Land.</li> <li>No loss of agricultural land.</li> <li>High archaeological potential.</li> <li>Site relates fairly well to neighbouring properties and nearby higher-density residential areas.</li> <li>Residential development is already occurring on nearby sites between Midgeland Road and Chapel Road.</li> <li>The site is considered potentially suitable for development, subject to appropriate access being established onto Chapel Road. Development of the site could form a</li> </ul>	
				coherent cluster with neighbouring properties, although the narrowness of roads leading to the site is likely to limit the site's capacity to 1 or 2 dwellings, as is the	

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
				need to preserve the priority habitat. Although the site falls within an area of Major Open Land identified in the open land study, it is a small site which is effectively screened from the wider landscape and its contribution to openness is considered to be limited.	
MM11 (SEA11)	Land (west) at Runnell Farm, Chapel Road, Blackpool	2.4 ha	N/A	<ul> <li>Greenfield site, currently used as a grazing field.</li> <li>Site falls within the Marton Mere SSSI Impact Zone for residential planning.</li> <li>Suitable access along Chapel Road</li> <li>Not within flood zone 2 or 3.</li> <li>Site is entirely within area identified as Major Open Land.</li> <li>Some loss of agricultural land (Grade 3).</li> <li>High archaeological potential.</li> <li>Relatively open site with limited surrounding development.</li> <li>The site is considered unsuitable for development. Although it has few constraints it is entirely within an area of Major Open Land identified in the open land study as an area that should be preserved through the Neighbourhood Plan. Development therefore has the potential to significantly alter the open character of this part of the neighbourhood area and may represent an unsympathetic expansion of the existing residential area.</li> </ul>	

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
MM12 (SEA12)	Land adjacent to "Derryn", School Road, Marton Moss, Blackpool, FY4 5EL	0.39 ha	1	<ul> <li>Site is partly previously developed, currently used for caravan parking, with a field in the northern half, fronting St. Nicholas Road.</li> <li>Site falls within the Lytham St Anne's Dunes SSSI Impact Zone for residential planning.</li> <li>Suitable access along School Road.</li> <li>Not within flood zone 2 or 3.</li> <li>Low landscape sensitivity.</li> <li>No loss of agricultural land.</li> <li>The site lies within Marton Moss Conservation Area, and mitigation would be required to minimise heritage impact.</li> <li>Site relates well to surrounding residential development.</li> <li>Overall, the site is considered suitable but unavailable for development. Although it has no significant constraints, the southern half of the site fronting School Lane has planning permission for use as a residential traveller caravan site and is therefore considered to be unavailable. While infill development of this part of the site has the potential to continue the linear pattern of development along School Road, development at the rear would represent an uncharacteristic extension into fields which separate School Road properties from those along St Nicholas Road.</li> </ul>	

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
MM13 (H)	Carandaw Farm, School Road, Blackpool, FY4 5EJ	0.4 ha	3	<ul> <li>Mixed brownfield/greenfield site, used as a paddock with outbuildings.</li> <li>Site falls within the Lytham St Anne's Dunes SSSI Impact Zone for residential planning.</li> <li>Suitable access along School Road.</li> <li>Not within flood zone 2 or 3.</li> <li>Low landscape sensitivity.</li> <li>No loss of agricultural land.</li> <li>The site lies within Marton Moss Conservation Area, and mitigation would be required to minimise heritage impact.</li> <li>Site relates well to surrounding residential development.</li> <li>The site is considered suitable for development, with few constraints, and has the potential to continue the linear pattern of development along School Lane while maintaining separation from properties along Kitty Lane to the south.</li> </ul>	
MM14a (Q)	The Hollies/Dea n Nurseries, Chapel Road,	0.2 ha	2	<ul> <li>Site is a brownfield site, currently occupied by a residential dwelling.</li> <li>Site falls partially within the Marton Mere SSSI Impact Zone for residential planning.</li> <li>Suitable access along Chapel Road.</li> </ul>	

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
	Blackpool, FY4 5HU			<ul> <li>Not within flood zone 2 or 3.</li> <li>Low landscape sensitivity.</li> <li>No loss of agricultural land.</li> <li>No impact on heritage assets.</li> </ul> The site is considered suitable for redevelopment with few constraints. It is already occupied by residential buildings, and could accommodate a replacement dwelling and an additional home with little impact on the character of the surrounding area.	
MM14b (P)	The Hollies/Dea n Nurseries, Chapel Road, Blackpool, FY4 5HU	1.0 ha	4-6	<ul> <li>Site is a greenfield site, forming part of the gardens of the adjacent residential dwelling.</li> <li>Not within flood zone 2 or 3.</li> <li>Low landscape sensitivity.</li> <li>No loss of agricultural land.</li> <li>No impact on heritage assets.</li> <li>Potential noise pollution from adjacent employment uses and the A5320.</li> <li>The site is considered suitable for development, subject to establishing suitable access either directly onto Chapel Road or through the adjacent site (MM14a) which forms part of the same submission. It is relatively enclosed and although it is a greenfield site, development is unlikely to have a noticeable impact on the</li> </ul>	

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
				surrounding area, however the developable area is likely to be limited by the design code's recommendation that culs-de-sac should not exceed 60m in length.  Mitigation may be required to minimise potential noise from the A5320 (existing screening vegetation) and employment uses to the east and west.	
MM15 (SEA15)	Corner Plot (Adjacent to Rose Villa) Chapel Road, Marton, Blackpool, FY4 5HU	0.63 ha	N/A	<ul> <li>Greenfield site, currently used as a grazing field.</li> <li>Site falls within the Marton Mere SSSI Impact Zone for residential planning.</li> <li>Suitable access along Chapel Road</li> <li>Not within flood zone 2 or 3.</li> <li>Site is entirely within area identified as Major Open Land.</li> <li>Some loss of agricultural land (Grade 3).</li> <li>High archaeological potential.</li> <li>Relatively open site with limited surrounding development.</li> <li>The site is considered unsuitable for development. Although it has relatively few constraints, it is poorly related to the settlement, having a relatively open setting with relatively little development in the surrounding area. It lies entirely within an area of Major Open Land identified in the open land study as an area that should be preserved through the Neighbourhood Plan. It is poorly located for local services and facilities, and development has the potential to alter the character of this part of the neighbourhood area.</li> </ul>	

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
MM16 (N)	Plot of Land, was "Marina Nurs", New Hall Avenue	0.6 ha	3	<ul> <li>Greenfield site, currently used as a paddock/grazing land.</li> <li>Access from New Hall Road.</li> <li>Site partially falls within flood zone 2.</li> <li>Low landscape sensitivity.</li> <li>No loss of agricultural land.</li> <li>Public footpath crosses site.</li> <li>Some potential impact on historic environment, as the site lies within Marton Moss Conservation Area – mitigation possible.</li> <li>The site is considered suitable for limited low-density development, avoiding the small part of the site which lies in flood zone 2. New Hall Road, used to access the site via the existing field gate, is narrow and would not support large-scale development. Development along New Hall Road is characterised by detached homes fronting the road with large gardens behind, and it is considered that this pattern of development would be most appropriate on this site.</li> </ul>	

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
MM17a (NA)	Former Baguleys Site, Midgeland Road	0.69 ha	12 dwellin gs (Plannin g Ref: 18/064 2)	Site has planning permission and is under construction. Considered suitable in principle for development, but not appropriate for allocation in the Neighbourhood Plan.	
MM17b (O)	Former Baguleys Site, Midgeland Road	0.38 ha	5	<ul> <li>Former industrial site, now unused field with no structures present.</li> <li>Poor access from Stockydale Road but potential to establish access from adjacent development to the west.</li> <li>Low landscape sensitivity.</li> <li>No loss of agricultural land.</li> <li>No impact on heritage assets.</li> <li>Refused permission for 4 dwellings (18/0077).</li> <li>The site is considered suitable for low-density development. A previous application for 4 dwellings was refused on the grounds of unsuitable access from Stockydale Road, and it is unlikely that access could be taken from this narrow road. However, there is potential to establish access from the residential development to the west.</li> </ul>	

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
MM18 (G)	442 Midgeland Road	0.79 ha	5	<ul> <li>Site is a mixed site, partially occupied by a residential property and garden and partially used for grazing.</li> <li>Established access from Midgeland Road and Kitty Lane.</li> <li>Not within flood zone 2 or 3.</li> <li>Low landscape sensitivity.</li> <li>No loss of agricultural land.</li> <li>Some potential impact on historic environment as the site lies within Marton Moss Conservation Area, but is relatively well screened.</li> <li>Refused permission for 19 retirement dwellings (19/0168).</li> <li>The site is considered suitable for limited development reflecting its low-density surroundings and location within the Conservation Area. A previous application for 19 dwellings was refused on the grounds of over-development and impact on local character. Development fronting Midgeland Road may be more in keeping with the existing character than a small residential estate covering the whole site, particularly since the existing access from the narrow Kitty Lane has poor visibility and is unlikely to be appropriate to serve new homes. Any development on the site should also be sympathetic to the land at Midgeland Farm on the opposite side of Midgeland Road, identified as important open land in the Major Open Land Study, particularly if proposals involve removal of the existing hedgerow.</li> </ul>	

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
MM19 (B)	Common Edge Road	2.14 ha	4-8	Mixed-use site. A small part of the site is currently occupied by a residential dwelling and garden, the larger part of the site is a greenfield used as grazing land.	
				Site falls within the Lytham St Anne's Dunes SSSI Impact Zone for residential planning	
				Suitable access off Common Edge Road.	
				Not within flood zone 2 or 3.	
				Low landscape sensitivity.	
				Some potential loss of agricultural land.	
				Some potential impact on historic environment as the site lies within Marton Moss Conservation Area.	
		Overall, the site is considered potentially suitable, subject to a sn site being developed, as development of the whole site would re uncharacteristic extension into open fields. Surrounding residen generally linear, and it is considered that development of a small western edge of the site could minimise these impacts. The site vary according site design and consideration of the Design Code recommendations on culs-de-sac within the Conservation Area.	Overall, the site is considered potentially suitable, subject to a smaller part of the site being developed, as development of the whole site would represent an uncharacteristic extension into open fields. Surrounding residential development is generally linear, and it is considered that development of a smaller portion of the western edge of the site could minimise these impacts. The site capacity is likely to vary according site design and consideration of the Design Code recommendations on culs-de-sac within the Conservation Area. If two access points can be established this may increase the developable area.		

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
MM20 (D)	Land at Sandy Lane	0.43 ha	1-2	<ul> <li>Site is a mix of greenfield and previously developed land, currently occupied by stables and grazing, with a temporary dwelling (mobile home).</li> <li>Site falls within the Lytham St Anne's Dunes SSSI Impact Zone for residential planning</li> <li>Private access road to the site along Sandy Lane.</li> <li>Not within flood zone 2 or 3.</li> <li>Medium landscape sensitivity with limited screening.</li> <li>No loss of agricultural land.</li> <li>Some potential impact on historic environment as the site lies within Marton Moss Conservation Area.</li> <li>The site is suitable for development, although the narrow access is unsuitable to allow for significant residential development which could generate unsustainable traffic movements. There may be some impact on views of the site from Sandy Lane and also Division Lane to the south due to the lack of existing screening.</li> </ul>	

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
MM21 (F)	Land north of Worthingto n Road	0.26 ha	1	<ul> <li>Mix of previously developed land (outbuildings associated with plant nursery) and horticultural land.</li> <li>Site falls within the Lytham St Anne's Dunes SSSI Impact Zone for residential planning.</li> <li>Single access track along Worthington Road.</li> <li>Not within flood zone 2 or 3.</li> <li>Low landscape sensitivity.</li> <li>No loss of agricultural land.</li> <li>Some potential impact on historic environment as the site lies within Marton Moss Conservation Area.</li> <li>The site is considered suitable for small-scale development (1 dwelling). Site capacity is limited by the narrow access along Worthington Road, and the immediate surroundings are characterised by low-density development, mainly of detached houses and agricultural buildings.</li> </ul>	

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating			
MM22 (I)	Land at School Road	0.44 ha	2	<ul> <li>Site is a green field site, currently used as a private woodland.</li> <li>Site falls within the Lytham St Anne's Dunes SSSI Impact Zone for residential planning.</li> </ul>				
				Access along School Road.				
				Not within flood zone 2 or 3.				
				Low landscape sensitivity.				
				No loss of agricultural land.				
				Some potential impact on historic environment as the site lies w     Moss Conservation Area.			Some potential impact on historic environment as the site lies within Marton Moss Conservation Area.	
				The site is suitable for infill development along School Road, subject to mitigation to address any loss of mature trees. Development is likely to be more appropriate on the southern edge of the site, with the rear of the plot maintained as woodland in order to preserve the character of the site and to avoid reducing separation between properties on School Road and those on St Nicholas Road to the north.				

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
MM23 (J)	Land west of St Nicholas Road	0.28 ha	2	<ul> <li>Site forms part of the garden of adjacent residential property.</li> <li>Site falls within the Lytham St Anne's Dunes SSSI Impact Zone for residential planning.</li> <li>Access along St Nicholas Road (single track).</li> <li>Not within flood zone 2 or 3.</li> <li>Low landscape sensitivity.</li> <li>No loss of agricultural land.</li> <li>Some potential impact on historic environment as the site lies within Marton Moss Conservation Area.</li> <li>The site is suitable for small-scale infill development, as it is surrounded by linear development along St Nicholas Lane. Access is narrow, limiting the capacity of the site to 1 or 2 dwellings. Any development on the site would require sensitive design due to potential impact on the Conservation Area.</li> </ul>	
MM24 (L)	Fishers Lane, Marton Moss	0.37 ha	1-2	<ul> <li>Site is a brownfield site, with existing residential dwellings, caravan storage and greenhouses.</li> <li>Site falls within the Lytham St Anne's Dunes SSSI Impact Zone for residential planning.</li> <li>Access along Fisher's Lane (single track).</li> </ul>	

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
				<ul> <li>Not within flood zone 2 or 3.</li> <li>Low landscape sensitivity.</li> <li>No loss of agricultural land.</li> <li>Some potential impact on historic environment as the site lies within Marton Moss Conservation Area.</li> <li>The site is considered suitable for replacement of the existing dwellings and small-scale infill development continuing the linear pattern of development along the north side of Fisher's Lane. To maintain the existing character of the area, development along the road would be more appropriate than on the northern half of the site, and it is unlikely that the existing narrow access would support significant intensification of the site.</li> </ul>	

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
MM25 (K)	Land off St Nicholas Rd	0.37 ha	1	<ul> <li>Site is a former market garden to the rear of dwellings.</li> <li>Site falls within the Lytham St Anne's Dunes SSSI Impact Zone for residential planning.</li> <li>Single track access to the south-eastern corner of site from St. Nicholas Road.</li> <li>Within flood zone 2.</li> <li>Low landscape sensitivity.</li> <li>No loss of agricultural land.</li> </ul>	
				<ul> <li>Some potential impact on historic environment as the site lies within Marton Moss Conservation Area.</li> <li>The site is suitable for development as it is relatively free of constraints. However, access to the site along St Nicholas Road is narrow and it would not be capable of supporting large-scale development. The surrounding properties follow a linear pattern along the road and development of this site would be uncharacteristic. Sensitive design would be required should the site be developed.</li> <li>Regulation 14 Consultation update:         <ul> <li>Updated</li> </ul> </li> <li>United Utilities (UU) and the Environment Agency (EA) advised that most of the site lies within flood zone 2 – therefore the site is no longer considered suitable for</li> </ul>	

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
MM26 (C) <sup>14</sup>	Land off School Road, near Common Edge Rd junction	0.24 ha	1	<ul> <li>Greenfield site currently used as a paddock</li> <li>Site falls within the Lytham St Anne's Dunes SSSI Impact Zone for residential planning.</li> <li>Currently no access off School Road, but potential to establish, subject to consultation with the highways authority.</li> <li>Not within flood zone 2 or 3.</li> <li>Low landscape sensitivity.</li> <li>No loss of agricultural land.</li> <li>Some potential impact on historic environment as the site lies within Marton Moss Conservation Area.</li> <li>The site is relatively free of constraints and is considered suitable for infill development, continuing the linear pattern along School Road. Access from School Road could be established, ideally at the eastern edge of the site to increase distance from the B5261 (Common Edge Road) junction. Alternatively, the site could be accessed from the lane leading off Common Edge Road which leads to the southwest corner.</li> </ul>	

<sup>&</sup>lt;sup>14</sup> This site was extended (Land at Corner of Common Edge Road and School Road) following the Regulation 14 consultation.

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
MM27 (E)	Land to the South of Worthingto n Road	0.11 ha	1	<ul> <li>Greenfield site, formerly a market garden.</li> <li>Site falls within the Lytham St Anne's Dunes SSSI Impact Zone for residential planning.</li> <li>Access off Worthington Road (single track) could support 1 or 2 dwellings.</li> <li>Not within flood zone 2 or 3.</li> <li>Low landscape sensitivity.</li> <li>No loss of agricultural land.</li> <li>Some potential impact on historic environment as the site lies within Marton Moss Conservation Area.</li> <li>Overall, the site is considered suitable for development of a single dwelling or pair of dwellings. Access along Worthington Road is narrow, limiting the overall capacity of the site, and any development should be sensitively designed to minimise impact on the Conservation Area.</li> </ul>	

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
MM28 (SEA28)	Land to the rear of Harrisons farm, Midgeland Road	0.23 ha	N/A	<ul> <li>Site is a greenfield site - currently used as a paddock</li> <li>No suitable access off Midgeland Road.</li> <li>Not within flood zone 2 or 3.</li> <li>BAP Priority Habitat (Traditional Orchard)</li> <li>Low landscape sensitivity.</li> <li>No loss of agricultural land.</li> <li>Some potential impact on historic environment as the site lies within Marton Moss Conservation Area.</li> <li>The site is considered unsuitable for development. Although it is relatively free of constraints, there is no existing access to the site, and it is not considered likely that this can be established since the site does not adjoin the highway. The surrounding area is characterised by linear development along Midgeland Road – development of this site is likely to result in uncharacteristic backland development, making it unsuitable even if access could be established. The presence of a priority habitat also acts as a potential restriction on development.</li> </ul>	

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
MM29 (A, partial/ southern half of site only)alloc ated)	Land North of Division Lane	1.73 ha	4	<ul> <li>Greenfield site comprising several smaller fields/paddocks.</li> <li>Not within flood zone 2 or 3.</li> <li>Low landscape sensitivity.</li> <li>No loss of agricultural land.</li> <li>Some potential impact on historic environment as the site lies within Marton Moss Conservation Area.</li> <li>The site is considered potentially suitable for small-scale development on the southern edge of the site (along Division Lane), in keeping with the loose linear development which characterises the surrounding area. Development of the northern part of the site would result in an uncharacteristic extension into open land and has the potential to adversely impact the rural character of the neighbourhood area.</li> <li>Regulation 14 Consultation update: Updated</li> <li>United Utilities (UU) advised there is a high risk of sewer discharge / flooding – therefore the site is no longer considered suitable for allocation in the MNP.</li> </ul>	
MM30 (U)	Land on corner of Jubilee Lane N and	0.24 ha	1-2	<ul> <li>Site occupied by existing dwelling and garden.</li> <li>Not within flood zone 2 or 3.</li> <li>Low landscape sensitivity.</li> </ul>	

SOA Site reference (MNP ref. or SEA ref.) <sup>13</sup>	Site name / location	Area (ha)	Indicative capacity	AECOM site assessment conclusion summary and updates where necessary to reflect latest Reg. 14 Consultation representations.	RAG rating
	Stockydale Road			<ul> <li>No loss of agricultural land.</li> <li>No impact on heritage assets.</li> <li>The site is considered suitable for re-development/replacement of the existing dwelling and creation of an additional dwelling. Access is narrow and would be unable to support significant intensification of the site.</li> </ul>	
MM31 (T)	Land to the East of Jubilee Lane N	0.58 ha	3	<ul> <li>Site occupied by existing dwelling and garden.</li> <li>Not within flood zone 2 or 3, however pond covering part of the site.</li> <li>Low landscape sensitivity.</li> <li>No loss of agricultural land.</li> <li>No impact on heritage assets.</li> <li>The site is considered suitable for low-density development. Capacity is limited by the narrow access along Jubilee Lane North, and high-density development would be out of character with surrounding properties, which are generally detached and in large grounds.</li> </ul>	

New sites identified through the Regulation 14 consultation process – assessed by the MNP Forum using the Locality Site Assessment template.

MNP site	Site name/	Area	capacity	MND cito accommon cummary	RAG
reference	location	(ha)	Capacity	MNP site assessment summary	rating
V	Grazing Land, Jubilee La. North	0.36	1	<ul> <li>Currently in use for grazing</li> <li>Neighbouring uses: residential</li> <li>No environmental or heritage constraints</li> <li>Low flood risk</li> <li>Low landscape sensitivity</li> <li>A mix of greenfield and previously developed land</li> <li>Adjacent to build area / existing settlement</li> </ul>	
W	41 Stockydale Rd.	0.29	2	<ul> <li>Site comprises garden and previously developed land (hen/ animal enclosures)</li> <li>Neighbouring residential use</li> <li>No environmental or heritage constraints</li> <li>Low flood risk</li> <li>Site crossed by United Utilities sewer</li> <li>Low landscape sensitivity</li> <li>Adjacent to existing built area</li> </ul>	

X	Amarella, School Rd.	0.53	4	Currently comprises field and gardens – site previous planning permission for garage, dormers and an extension.	
				Neighbouring area is in residential use	
				No environmental constraints	
				In Marton Moss Conservation Area	
				Low flood risk	
				Low landscape sensitivity	
				Within / adjacent to existing built-up area	
Stan's	Stan's	0.26	6 1	Currently in business use (Nurseries and Mower repairs)	
Mowers	Mowers, New Hall Avenue			Neighbouring uses: Garage, Horse stables, Vehicle recovery	
				In Marton Moss Conservation Area	
				No environmental constraints	
				Low landscape sensitivity	
				Within existing settlement boundary	
				Black Pool Council advised that the site comprises a flood zone 2	
				Regulation 14 Consultation:	
				United Utilities (UU) and the Environment Agency (EA) advised that the entire site lies within a flood zone 2 – therefore the site is not considered suitable for allocation in the MNP.	

## 5.3.5 Outline reasons for selecting the preferred sites option

The decision relating to the allocation of preferred sites is based primarily on the outputs from the site assessment exercises. This demonstrates that the preferred sites perform well overall compared to the discounted site options (when considered across the full range of criteria).

The SOA concluded that there are no significant constraints associated with 17 of the sites (green sites in Table 5.1). However, during the regulation 14 consultation the EA expressed concerns regarding flood risk issues for 2 of these sites (MM9 and MM25) which were subsequently discounted. Four of the sites (S, R, B and A) were considered to be potentially suitable, subject to the mitigation of identified constraints. These sites were rated Amber in in the SOA but the identified constraints can potentially be mitigated (See Table 5.4 for details).

## 6. What are the appraisal findings at this current stage?

## 6.1 Introduction

The aim of this chapter is to present appraisal findings and recommendations in relation to the Regulation 16 version of the MNP.

## 6.2 Current approach in the NP and the development of policies

Table 6.1 lists the MNP policies under 5 categories.

## **Table 6-1 Marton Moss Neighbourhood Plan Policies**

Housing	and the built environment policies
MM1	Building Design
ММЗ	School Road/ Midgeland Road Junction
MM4	Housing Site Allocations
MM5	Windfall Housing
Natural a	and historic environment policies
MM2	Open Land Character
MM9	Local Green Space
Commun	nity facilities policies
MM8	Midgeland Farm
Transpo	rt
MM10	Footpaths, Bridleways and Cycle Routes
Employm	nent
MM6	Market Gardening
MM7	Horse Stabling and Riding Activities

# 6.3 Approach to the appraisal

The appraisal is structured under each of the SEA Objectives that are set out in the SEA Framework.

For each Objective, 'significant effects' of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.

Prepared for the Marton Moss NP Forum

<sup>&</sup>lt;sup>15</sup> Environmental Assessment of Plans and Programmes Regulations 2004

The higher growth alternative is also appraised in a text box under each section. This is based on the constraints identified at the site assessment stage and their likely effects on the SA topics considered. The site specific issues are also addressed in combination to ensure that the cumulative effects of a higher growth option are identified.

Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

## 6.4 SEA Objective 1 Biodiversity

Protect, maintain and enhance biodiversity habitats and species; achieving a net environmental gain and stronger ecological networks.

## Appraisal findings: Site Allocations

The MNP proposes to allocate 21 sites for residential development, across the NP area. The overall quantum of development envisaged is around 71-81 dwellings (depending on type/ size of housing) with the largest site allocated for up to 15 dwellings. Of the 21 sites, 15 were rated Green in the SOA indicating these are unlikely to have significant adverse effects on biodiversity.

Three of the allocated sites were Amber rated (S, B and R<sup>16</sup>), sites S and R partially overlap BAP Priority habitats but the SOA concludes that potential impacts can be mitigated by developing smaller areas of the sites. Site B (Common Edge Rd.) lies within the Lytham St Anne's Dunes SSSI Impact Risk Zone for residential preproposals of 10 or more dwellings. Impact Risk Zones (IRZs) define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. Therefore, these sites would require consultation with Natural England for advice on the nature of any potential SSSI impacts and how they might be avoided or mitigated. However, the MNP is proposing a development of up to 4 homes on this site which is well below the 10 threshold.

The HRA<sup>17</sup> for the MNP notes that Moss NP area lies within 5km of the Ribble Estuary SPA/Ramsar site and it is therefore possible residents (from the 81 new dwellings) might visit the SPA/Ramsar site potentially leading to increased risk of recreational pressure on some of the protected areas which are already under pressure from the

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<sup>&</sup>lt;sup>16</sup> The site references used in this part of the report are those given in the MNP policy MM4.

<sup>&</sup>lt;sup>17</sup> AECOM report: Habitat Regulations Assessment: Marton Moss Neighbourhood Plan (July 2022)

existing local population. However, the HRA concludes that 'the degree of risk from Marton Moss is likely to be considerably less than from areas closer to the SPA/Ramsar'.

Site C (includes SOA site MM26) has now been expanded to include the adjacent plot on Common Edge Rd. (allocated for up to 7 additional dwellings). In the regulation 14 consultation, Natural England (NE) recommended consideration was given to potential recreational pressure impacts on the SPA/Ramsar site.

Site R was originally included in the Major Open Land area but subsequently excluded from this designation following the options consultation in the summer of 2020. This relatively small site is allocated for 2 dwellings and sits at the edge (to the west) of the Major Open Land area. The SOA noted that the site is 'well screened from the wider landscape and its contribution to openness is considered to be limited'. Therefore, it is not envisaged to have significant effects on Major Open Land.

No environmental constraints have been identified for the 3 additional sites (V, W and X) identified by the MNP through the reg. 14 consultation process.

Overall, provided appropriate mitigation is followed to reduce potential recreational pressures on the Ramsar/ SPA site, the MNP site allocations are predicted to have **neutral effects** on biodiversity as the majority of sites are relatively free of environmental constraints and the scale of development is unlikely to engender significant effects on biodiversity. This is echoed in the HRA<sup>18</sup> which assessed the potential effects of the MNP site allocations and concluded that: *'it is quite possible that adverse effects from recreation on the integrity of the European site of relevance to the Marton Moss Neighbourhood Plan area can be reasonably concluded not to arise.'* 

## Appraisal findings: Draft MNP Policies

#### Housing and the built environment

Policies MM1 and MM5 address design code, open space and housing development. Of the group, Policy MM1 is likely to have the most prominent effects on biodiversity, requiring that all new development proposals retain existing trees and hedgerows and therefore likely to have beneficial effects on biodiversity by maintaining well established habitats. The policy also includes the provision of nature conservation information packs to the occupiers of new residential development and commits to wildlife habitat creation within new developments. The homeowner packs will (coupled with the requirements of Blackpool Local Plan policy) will serve to protect the European sites regarding all other Marton Moss allocations (including the additional 7 dwellings to be built on the extended site C/ MM26).

Policy MM4 allocates 71 to 81 new dwellings over the plan period. The effects are discussed under the site allocations section above.

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<sup>&</sup>lt;sup>18</sup> Ibid para. 5.20

Policy MM5 supports housing development on Windfall sites. These will be limited to small infill sites and / or on previously developed land and would be expected to meet the same levels of sustainability as Policy MM1.

Overall, this set of policies is likely to have a neutral effects on biodiversity due to the limited scale of growth proposed and the retention of exiting habitats such trees and hedgerows. Having said that the MNP presents an opportunity to deliver gains for the NP area's habitats, such as grasslands, and linear habitats such as hedgerows/ lines of trees and water courses, along the lines suggested in the Small Sites Metric draft guidance<sup>19</sup>. In this context Policy MM1 which requires wildlife habitat creation within development sites could help achieve biodiversity net gain as part of new development. However, the effects will depend largely upon the detailed design of developments and how 'green space' is interpreted. Small non-functional pieces of 'greenery' should be discouraged in favour of larger spaces and stepping stones that can perform a useful function for biodiversity.

#### Natural and historic environment

Marton Moss has an open rural character, low-density development is prevalent, and areas of open land contribute to the overall rural feel. The Marton Moss Design Code<sup>20</sup> identify the following as Major Open Land to be protected:

- Land between Chapel Road and Yealdon Way
- South of Ecclesgate Road
- East of sandy Lane and Worthington Road
- The report also states that any future development within the Midgeland Farm site should be designed such that it retains the openness of the landscape.

Policy MM2 seeks to maintain the openness of the above areas by supporting development proposals on Major Open Land provided these maintain the open character of the area. The policy also supports local nature recovery measures. The Major Open Land Study<sup>21</sup> notes that these Major Open Land areas include marshy grassland, rare plant species such as the Common Meadow Rue (a protected habitat), a water attenuation area and a pond which may potentially support newts. The Study concludes that these 'tracts are important as wildlife corridors in the local ecological networks that can support priority habitats and overall offer opportunities for improving biodiversity'. Therefore, allowing development on Major Open Land, can potentially have adverse effects on biodiversity due to disturbance and / or loss of existing habitats and species. However, the effects are counteracted to some extent by the Policy's requirement that the open nature of the area is retained and by its support for nature recovery measures. Therefore, only minor negative effects on biodiversity are anticipated.

<sup>&</sup>lt;sup>19</sup> Natural England Joint Publication JP040 "Small Sites Metric"

<sup>&</sup>lt;sup>20</sup> AECOM report: Marton Moss Neighbourhood Plan Design Code (2020)

<sup>&</sup>lt;sup>21</sup> Marton Moss Major Open Land study (July 2020)

Policy MM9 is concerned with local green space, designating an area of open space North of St Nicholas School as Local Green Space where only *minor buildings or similar structures ancillary to and essential for the open recreational enjoyment of this land will be permitted.*' The areas include semi-wild grassland, bushes and small trees with numerous regularly mown pathways and includes small water bodies. The tract also forms part of a major tract of open land. Overall, this policy is predicted to have minor positive effects on biodiversity as it serves to protect this tract of land securing the existing habitats and maintaining its function as a biodiversity link.

### Community facilities

Policy MM8 proposes to safeguard the Midgeland Farm site as a community park. This is to include provision for footpaths, cycle paths and horse riding. The site was identified as Major Open Land and retaining it as open green space in the form of a community park is likely to be minor positive with respect to biodiversity as it is likely to maintain existing habitats and ensures this tract of land continues to serve as a biodiversity link. MM8 has the potential to improve recreational capacity within the NP area thus significantly reducing the need for residents to travel outside the area or to the SPA/Ramsar for recreation.

#### **Transport**

Policy MM10 is primarily concerned with the provision of footpaths and cycle routes as part of new development. The policy is generally beneficial as it may encourage residents to switch to walking or cycling for more of their shorter journeys thus helping to protect biodiversity. The seeks to protect biodiversity by requiring that improvements of access to existing footpaths and bridlepaths should be contingent on them not exacerbating recreational pressure issues at designated biodiversity sites. Overall, effects are unlikely to be significant therefore neutral effects are predicted.

#### **Employment**

Policies MM6 and MM7 support market gardening and equestrian activities respectively. This may involve the re-use of existing land and structures (such a disused greenhouses) and / or redeveloping land previously used for such activities. Positive effects are likely to result from these policies as they help maintain the open and rural character of the area which helps to reduce habitat fragmentation. However, this is counterbalanced by the potential loss of biodiversity on sites where development involving new structures may harm previously undisturbed, established biodiversity (e.g. on disused or derelict areas). It may be possible to implement appropriate mitigation based on ecological surveys of such sites prior to redevelopment. However, there remains an uncertainty at this stage therefore uncertain / minor negative effects remain at this stage.

#### Overall (cumulative) effects

Whilst some aspects of the plan policies can potentially have minor negative effects (e.g. allowing certain types of development on Major Open land) these are counterbalanced by the beneficial effects expected through policies seeking to

protect major Open Land areas and Local Green space. These areas connect with other open spaces on the Moss constituting a linked network of habitats and wildlife corridors. The plan also supports local nature recovery opportunities and biodiversity net gain. Overall, this set of policies is likely to have minor positive effects on biodiversity due to the limited scale of growth proposed, the retention of trees and important areas of green space and the support for nature improvement and biodiversity net gain measures as part of new development.

## Appraisal of the high growth alternative (295 dwellings)

Collectively the additional sites included in the high growth scenario (table 4.1) would deliver up to 214 dwellings. When added to the housing sites in the draft MNP, the total growth would total up 295 dwellings. Apart from sites SEA4 and SEA28, all remaining sites are entirely within Major Open Land. Therefore, developing these sites would result in the loss of most of these important tracts of open, green space with their associated habitats and their function as important ecological links (discussed above). Site SEA28 contains an area of traditional orchard, an important Priority Habitat and therefore adverse effects are potentially likely on this site. Overall, additional development on this collection of sites has the potential for significant negative effects on biodiversity due to the loss of Major Open Land. Furthermore, the substantial additional development proposed would engender significant pressures on biodiversity through the disruption of primarily rural habitats due to recreational pressures including noise, light and domestic animals and through fragmentation. Though it is important to point out that some of the positive effects of the plan policies are also likely to apply to the high growth alternative.

# 6.5 SEA Objective 2: Climate change

Avoid and manage flood risk and support the resilience of the Marton Moss Neighbourhood Plan area to the potential effects of climate change.

## Appraisal findings: MNP Site Allocations

The limited scale of growth proposed is not considered likely to lead to significant effects in relation to climate change mitigation. In terms of adaptation to climate change, the majority of sites are located in areas at low risk of flooding. Small areas of site N are within flood zone 2 but as noted in the SOA this can be mitigated by avoiding development on the vulnerable areas. Therefore, given that majority of sites are located in areas at low risk of flooding and the potential to mitigate risk on site N, neutral effects are envisaged in terms of flood risk.

## Appraisal findings: Draft MNP Policies

#### Housing and the built environment

Within this group of policies, Policy MM1 (Building design) is of relevance when considering potential impacts on climate change adaptation, particularly with respect to flood risk. The policy is anticipated to have beneficial effects on reducing flood risk as it requires new development to incorporate sustainable drainage systems (SuDS). This should help improve permeability and reduce the velocity and volume of run off from new development.

#### Natural and historic environment

Policies MM2 (Open land character) and MM9 (Local green space) seek to safeguard areas designated in the MNP as; Major Open Land and Local Green Space. These areas are part of the green infrastructure (GI) of Marton Moss. GI is widely recognised as an effective tool to combat the impacts of climate change. For example, GI networks act as natural flood defences; improving flood water retention / attenuation; they also reduce heat islands in urban areas and help species migrate. Green spaces also act as a carbon sinks helping to reduce CO<sub>2</sub>. Therefore, this this set of policies is predicted to have a minor positive effect on climate change adaptation as it seeks to preserve the GI within the NP area and its associated climate change benefits.

#### Community facilities

Policy MM8 relates to the Midgeland farm site, safeguarding it as a park with appropriate tree planting and landscaping. This is likely to produce beneficial effects with respect to climate change as the park would serve to retain / attenuate potential flooding, reduce urban heat island effects and act as a CO<sub>2</sub> sink. Therefore, minor positive effects are predicted.

#### **Transport**

Policy MM10 seeks to improve walking and cycling networks requiring new development to improve existing pedestrian and cycle routes and / or provide new

ones. This is likely to be helpful in terms of climate change mitigation as it will encourage active travel potentially leading to a reducing in the number of car journeys and associated emissions.

## **Employment**

Minor positive effects are predicted from Policies MM6 and MM7 with respect to climate change resilience as they help maintain the open and rural character of the area thus retaining the flood mitigation properties of such areas.

## Overall (cumulative) effects

From a resilience / adaptation point of view, the allocated sites are not within major flood risk zones and several policies seek to protect and enhance open space and green spaces and Gl. This can have benefits with regards to urban cooling, strengthening networks for wildlife, and managing wider flood risk. In terms of mitigation, the Plan supports the enhancement of existing walking and cycling routes and provision of new ones. Overall, the Plan policies are predicted to have a minor positive effects on the climate change SEA theme.

## Appraisal of the high growth alternative (295 dwellings)

In terms of flood risk; the additional sites involved in the high growth scenario are located in areas at low risk of flooding. However, some of the sites (SEA1, SEA2, SEA3 and SEA15) involved are somewhat remote from existing settlement and local services. Developing these is likely to lead to more and/or longer car journeys to access services. Most of the sites involved in the high growth scenario are entirely within Major Open Land. As discussed above, these tracts of open green space provide important flood mitigation and CO2 capture services. Therefore, developing them would result in the loss of the important climate change resilience and mitigation they provide. In conclusion, whilst the additional sites are located in low flood risk areas, the loss of important open green spaces (Major Open Land) combined with the relatively remote locations of some of the sites is likely to generate minor negative effects in the long term.

# 6.6 SEA Objective 3: Historic Environment

Protect, enhance and manage the distinctive character and setting of heritage assets and the built environment

## <u>Appraisal findings: Site Allocations</u>

The delivery of housing within Marton Moss has the potential to impact heritage assets and their settings if inappropriately located and designed. The NP area contains several Grade II listed buildings which have been designated by Historic England as being of special interest by way of their historic and architectural value. However, there are likely to be numerous other non-designated buildings or features within the area that have local historic or architectural merit.

Designated in 2019, the Marton Moss Conservation Area is bounded by the southern edge of Progress Way to the north, east side of Common Edge Road to the west (running at the rear of modern buildings as necessary), along the middle of Division Lane to the south, and the borough boundary with Fylde to the east. The Marton Moss Conservation Area Appraisal describes it as 'one of small piecemeal post - medieval enclosure surrounded by busy arterial routes. It consists of the earliest cobbled buildings through to modern detached bungalows. Within the busy communication infrastructure it is an enclosed leafy landscape based around lanes, rectangular fields and drains with views limited to gaps in hedgerows on the narrow lanes, and across open paddocks.'

In terms of housing allocated in the MNP sites S and R overlap ancient enclosures with high archaeological potential. Therefore, these would require appropriate surveys and mitigation. Several sites (A to N) fall within the Marton Moss Conservation and mitigation would be required to minimise impacts on the historic environment.

In conclusion, with appropriate mitigation and sensitive development in accordance with the MNP's Design Code, the majority of sites allocated for housing in the MNP are unlikely to give rise to significant effects on the historic environment. However, potentially minor negative effects are possible due to the archaeological potential associated with sites S and R.

#### <u>Appraisal findings: Draft MNP Policies</u>

#### Housing and the built environment

Within this set of policies, Policy MM1 (Building design) requires that new development be informed by the Marton Moss Design Code 2020 to ensure that new development is in keeping with the local character and vernacular styles. For example, it states that cul-de-sac layouts are not appropriate in the Conservation Area and that new development should front onto existing roads. It also requires that developments use appropriate materials and be of appropriate density (not to exceed 8 dwellings per hectare in the Conservation Area). The policy also seeks to protect archaeology stating that land with high archaeological potential would be fully assessed and appropriate action taken to protect and record important features (of particular relevance to sites

S and R). Potentially minor positive effects are predicted from this set of policies as they seek to preserve the existing character within the Marton Moss Conservation Area and address potential impacts pertaining to sites S and R.

#### Natural and historic environment

Policy MM2 (Open Land Character) is of particular relevance to this SEA theme as it seeks to maintain an important feature of the NP area, namely the areas identified as Major Open Land which form an important part of Marton Moss's heritage and character. Minor positive effects are anticipated as the policy serves to protect these areas from inappropriate development seeking to preserve their open, pastoral character.

#### Community facilities

Policy MM8 (Midgeland Farm) seeks to partially retain the historic Midgeland Farmhouse site and its remaining original buildings. The site dates back to the 16<sup>th</sup> century. The buildings remaining on site today include a 19<sup>th</sup> century farmhouse, stables, barn and shippons. These are currently in a poor state of repairs due to many years of disuse. The site is closed to the public and the buildings are at risk of further disrepair as they become more exposed to the elements. The policy seeks to safeguard the land that's within the NP boundary (11 ha) as a community park to include a range of paths for walkers, joggers, cyclists and horse riders and room for significant landscape planting. This would be particularly valuable to the NP area as there are no public parks within the area and limited public rights of way paths that are in good condition. The policy is likely to have minor positive effects on the historic environment as it seeks to partially retain the structures and to provide interpretative material describing the heritage aspects associated with the area.

## <u>Transport</u>

No significant effects on this SEA theme are expected from the transport policies.

#### **Employment**

Policy MM6 supports the continuation (where possible) of horticultural businesses and future alternative uses of structures, such as glasshouses, associated with them. Market gardening forms part of the NP area's heritage. This has left an imprint on the vernacular architecture of older houses and scale and of plots. Horse riding is a popular activity within the NP area and many of the former market gardening plots are now used for the grazing, exercising and stabling of horses. The continuation of these activities is supported in Policy MM7 (Horse stabling and riding activities). By seeking to preserve and facilitate the re-use of some of the dis-used structures previously associated with market gardening the policies are likely to generate positive effects on the historic environment.

#### Overall (cumulative) effects

The potential adverse effects of sites S and R are counteracted by MNP policy MM1 which seeks to protect archaeology requiring that the archaeological potential of these sites be fully assessed, and appropriate action taken to protect and record important features. Positive effects are anticipated as a result of other MNP policies seeking to protect the character of the Marton Moss Conservation Area and to safeguard/partially retain local heritage assets and structures associated with Marton Moss's market gardening heritage (e.g. at Midgeland Farm) leading to minor positive effects overall.

# Appraisal of the high growth alternative (295 dwellings)

In terms of development site locations, several of these additional sites are within areas of high archaeological potential (SEA3, SEA4, SEA8, SEA11 and SEA15) and therefore potential adverse effects are possible as is the case for the preferred option discussed above, although in this case there is greater potential harm due to the 5 additional sites involved. Furthermore, five of the sites are on locations within Major Open Land and would result in a significant change to the historic landscape character of the area. Therefore, significant negative effects on the historic environment are predicted under the high growth scenario.

# 6.7 SEA Objective 4: Landscape

Protect, enhance and manage the distinctive character and appearance of landscapes.

## Appraisal findings: Site Allocations

The majority of housing sites allocated were assessed in the SOA as having low sensitivity in terms of landscape. Site R is adjacent to Major Open Land but as noted in the SOA, it is a relatively small site and effectively screened from the wider landscape and its contribution to openness is considered to be limited. Overall, with appropriate mitigation for site R, the allocated sites are predicted to have **neutral effects** on landscape as they are predominately in areas of low landscape sensitivity.

## Appraisal findings: Draft MNP Policies

## Housing and the built environment

Policy MM1 (Building Design) is potentially positive, requiring new development schemes to minimise their impact on the appearance of the wider area by retaining existing trees and hedgerows and including appropriate landscaping and garden layouts.

Policy MM3 (School Road/ Midgeland Road Junction) seeks to improve the appearance of the School Road/ Midgeland Road crossroads which serves as gateway to the NP area. This area around the crossroads has a poor appearance and includes a former bus turnaround/layby and unsightly, dilapidated fencing. The policy supports development here provided it maintains the open character associated with Major Open Land (Policy MM2). The policy adds that an appropriately designed art installation will also be supported here. This is likely to have beneficial effects on the landscape as it seeks to improve the appearance of this location whilst maintain the open character of the landscape associated with Major Open Land.

Policy MM5 (Windfall Housing) supports development on land not allocated within the Plan provided it is in a small gap in a built up street frontage or on land currently or recently occupied by a building. The policy also requires that such development would not significantly reduce the open character of the area.

Overall, this set of policies is predicted to have minor positive effects on landscape as it seeks opportunities to enhance the gateway into the NP area and the housing sites allocated are in areas assessed to be of low landscape sensitivity.

#### Natural and historic environment

Policy MM2 (Open Land Character) is expected to have positive effects on the landscape as it seeks to protect an important feature of the NP area, namely the areas identified as Major Open Land which form an important part of Marton Moss's landscape character.

## Community facilities

Policy MM8 (Midgeland Farm) is also likely to produce positive effects on the landscape as it seeks to at least partially retain the Midgeland Farmhouse structures and safeguarding the site as a community park with significant landscape planting. This would be particularly valuable to the NP area as there are no public parks within the area.

#### Transport

Policy MM10 (Footpaths, bridleways and cycle routes) is anticipated to have minor positive effects on landscape within the NP area. This is due to improvements sought to footpaths, bridleways, cycle and walking routes. These features contribute to the landscape and countryside (and access to them), so such improvements/ enhancements should have a positive effect on the landscape.

# **Employment**

Policies MM6 and MM7 support the re-use of structures and buildings associated with market gardening and equestrian activities. This is to involve the re-use of existing land and structures (such a disused greenhouses) and /or redeveloping land previously used for such activities. The policies require development to be appropriate in terms of scale and to relate well to extensive open land. These policies are predicted to have minor positive effects on landscape as they seek to re-use some of the disused structures thus helping to improve the appearance of the area whilst preserving the historical landscape character including its openness.

#### Overall (cumulative) effects

Overall, the MNP is expected to have minor positive effects on Landscape as the allocations are mostly located in areas of low landscape sensitivity and the Plan seeks to preserve the open character of Major Open Land, enhance a gateway location into Marton Moss and reuse existing land and buildings.

# Appraisal of the high growth alternative (295 dwellings)

Five of the additional sites (SEA6, SEA8, SEA11 and SEA15) were assessed in the SOA as being highly sensitive to development with respect to landscape. These are located within the Major Open Land area. Of the remaining sites, four were assessed as being of medium sensitivity and the rest at low sensitivity. Development at these additional sites, particularly one's within Major Open Land will substantially alter the rural, open, landscape to one more urban in character. Therefore, the high growth alternative is predicted to produce significant negative effects on landscape.

# 6.8 SEA Objective 5: Population and Housing

Provide everyone with the opportunity to live in good quality, affordable housing which meets the needs of occupiers throughout their life

## Appraisal findings: Site Allocation

Generally, the sites allocated for housing in the MNP are within or adjacent to existing built up areas, in locations accessible to services and facilities present in the NP area. This is likely to have positive effects as accessibility to services and facilities is a key influence on the quality of life of residents and community cohesion.

The Housing Needs Assessment (HNA) concluded that there is substantial need for affordable housing in the NA (at least 20 units) based on Marton Moss's share of Blackpool's need. Therefore, it will be important to maximise the provision of new affordable homes, in line with Blackpool's Local Plan, when new housing developments are delivered in the NA. However, in practice the number of new homes delivered in the NA over the plan period is likely to be limited given Blackpool's indicative housing requirement for the area of 28 homes. Furthermore, if new homes are delivered on small sites (e.g. as infill developments) they may fall below affordable housing thresholds. The HNA also suggests there might be 32-51 dwellings required by the end of the plan period to meet the needs of older people. It is important to stress, that some of these people are already living in mainstream housing within Marton Moss and their needs are being met through care and support in the home. Some may have made adaptations to their dwellings to improve accessibility of other features.

Over 83 completions have taken place in Marton Moss over the earlier years of the Core Strategy plan Period. When taken into account the completions exceed what would be required under the Core Strategy, apportioned to the NP area.

The MNP proposes to allocate up to 81 new dwellings across the NP area to contribute to the locally assessed housing need and to contribute to the strategic housing targets. The Housing Needs Assessment (HNA) identified a need for 20 affordable homes over the Plan period. The plan also seeks to provide smaller, more affordable properties for first time buyers and older residents looking to downsize in the form of terraced housing. This should help attract and retain younger residents maintaining the vitality and the sustainability of the villages and will also help local workers find homes locally.

#### Appraisal findings: Draft MNP Policies

#### Housing and the built environment

Policy MM4 allocates 21 sites for housing with a capacity of up to 81 new homes in total. As discussed above this exceeds the indicative housing requirement figure. In this context the policy is positive as it provides a greater number of housing which this is likely to improve choice in the market terms of type and size of dwelling as well as helping to provide more affordable housing.

Policy MM1 (Building design) requires that new development be informed by the Marton Moss Design Code 2020 to ensure that new development is in keeping with the local character and vernacular styles. It also seeks to ensure that new development of is of high quality and of appropriate density.

Policy MM5 (Windfall housing) supports the provision of housing on windfall sites which likely to be beneficial as such sites make an important contribution to housing supply particularly in semi-rural areas such as Marton Moss.

This set of policies is predicted to have positive effects on population and housing as it seeks to provide substantial new, well designed housing, exceeding the indicative housing requirement for the NP area.

## Natural and historic environment

This set of policies is generally positive with respect to population as it seeks to protect the openness of Major Open Land areas and designate local green space, thus helping to maintain the attractiveness of the NP area as a place to live.

## Community facilities

No significant effects are predicted on the population and housing theme though Policy MM8 is generally positive as it seeks to safeguard and potentially re-use the Midgeland Farm site which is likely to produce benefits to the community.

#### <u>Transport</u>

Policy MM10 (Footpaths, bridleways and cycle routes) seeks to improve accessibility via foot paths and cycle routes requiring development to consider opportunities for creating multi-modal paths and improve connectivity. This is predicted to have positive effects as it helps reduce social isolation, allows residents to walk / cycle for work or pleasure and to access services and facilities.

## **Employment**

No significant effects are predicted on the population and housing theme though this set of policies may help provide local employment opportunities through support for horticultural and equestrian businesses.

#### Overall (cumulative) effects

Overall, the plan is predicted to have **significant positive effects** on population and housing. The policies are supportive of improving housing supply and accessibility, protection of green spaces and community facilities; all of which are important to the community's well-being and social value. In particular, the allocation of housing sites will contribute towards meeting housing needs (including affordable housing), helping to maintain the local population in suitable accommodation.

# Appraisal of the high growth alternative (295 dwellings)

Some of the sites included under the high growth scenario are somewhat remote from existing built up areas and may therefore reduce access to amenities and services. On the other hand, developing the additional sites would provide substantial new housing (up to 295 new homes) which will meet and exceed the assessed housing need. It is also likely to deliver more affordable housing. Overall, this scenario is likely to have significant positive effects on housing and population.

## 6.9 Conclusions

# 6.9.1 Summary of effects

This section summarises the overall effects of the Plan against each of the SEA Topics. It is important to differentiate between significant effects, which are predicted to lead to changes in the baseline position, and those effects that are broadly positive or negative, but are less likely to lead to substantial changes.

Table 6.1 summarises the overall effects of the policies within the draft MNP for each SEA topic.

**Table 6.1: Summary of overall effects for each SEA Topic.** 

	Biodiversity	Climate change	Historic Environment	Landscape	Population and housing
MNP	Minor positive	Minor positive	Minor positive	Minor positive	Significant positive
High growth Alternative	Significant negative	Minor negative	Significant Negative	Significant negative	Significant positive

The plan is predicted to have positive effects for all five SEA topics. The main benefits of the Plan relate to population and housing, as the plan seeks to deliver quality designed, new homes at a level that substantially exceeds the indicative housing requirement figure for the NP area.

The Plan also scores positively with respect to Landscape and the historic environment due to the inclusion of policies seeking to protect the landscape character, heritage assets, archaeology and the Marton Moss Conservation Area.

The high growth alternative scores less well when compared to the MNP; scoring significant negatives on biodiversity, the historic environment and landscape, primarily due to development on sites within Major Open Land and sites of high archaeological potential. It also performs less well in terms of effects on climate change. However, significant positive effects are predicted with respect to population and housing as this option has the potential to meet and exceed the locally assessed housing need for Marton Moss.

#### 6.10 Recommendations

Through the SEA process, a number of recommendations are revealed to enhance the positive effects of the plan and mitigate any negatives. The first iteration of the SEA (accompanying the Regulation 14 draft MNP) made the following recommendations:

- The inclusion of a requirement to the investigation archaeological potential and take appropriate protective action.
- To include the requirement for an ecological survey of site considered for redevelopment in policy MM6 to avoid potential harm to established biodiversity.

Both of the above recommendations are now implemented in the Regulation 16 MNP through additions to policies MM1 and MM6 and there are no further recommendations.

# 6.11 Monitoring

There is a requirement to present measures that could be used to monitor the effects of the Plan identified through the SEA. It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by Blackpool Council as part of the process of preparing its Annual Monitoring Report (AMR).

Significant positive effects have been predicted, and it is important to monitor these to track whether or not they arise in practice (Table 6.2). This allows for remedial action to be taken should the positive effects not occur as anticipated.

**Table 6.2: Monitoring measures** 

Significant Effects	Proposed monitoring measures	
Population and housing	Monitor annual net housing completions	
Significant positive	Monitor affordable housing delivery	

# 7. What are the next steps?

This updated Environmental Report should accompany a Regulation 16 version of the Marton Moss Neighbourhood Plan for consultation.

Following that consultation, the MNP will be submitted to the Local Planning Authority, Blackpool Council (BC), with this updated Environmental Report. This version will be the formal version submitted under Regulation 15 of the Neighbourhood Plans General Regulations 2012.

BC will consider whether the plan is suitable to go forward to Independent Examination in terms of the MNP meeting legal requirements and its compatibility with the Local Plan.

Subject to BC's agreement, the MNP will then be subject to independent examination. The Examiner will consider whether the plan is appropriate having regard to national policy and whether it is in general conformity with local policies.

The Examiner will be able to recommend that the MNP is put forward for a referendum, or that it should be modified or that the proposal should be refused. BC will then decide what should be done in light of the Examiner's report. Where the report recommends modifications to the plan, BC will invite the MNP Forum to make modifications to the plan, which will be reflected in an updated Environmental Report. Where the Examiner's Report recommends that the proposal is to be refused, BC will do so.

Where the examination is favourable, the MNP will then be subject to a referendum, organised by BC.

If more than 50% of those who vote agree with the plan, then it will be passed to BC with a request it is 'made'. Once 'made', the MNP will become part of the Development Plan for the Borough.

# **Appendix A: Scoping Report**