

Blackpool Borough Council
Development Plans & Projects
PO Box 77
Blackpool
Lancashire
FY1 1AD

Our ref: CE/2007/100763/BD-
01/IC1-L01
Your ref:
Date: 24 December 2007

Dear Sir/Madam

**LOCAL DEVELOPMENT FRAMEWORK & FOXHALL AREA ION PLAN
SUSTAINABILITY SCOPING REPORTS**

Thank you for referring the above to us. We are generally in agreement with the scope of the report but have the following comments:-

In SA Objective 15, it refers to groundwater and coastal waters. We feel that reference should also be made to non-coastal surface water. The indicator for this is given as compliance with Bathing Water Directive. This, of course, does not apply to groundwater and is only of limited use when applied to non-coastal surface water.

SA Objective 17 refers to managing flooding. Paragraph E5 of PPS 25 (Development and Flood Risk) requires that a Strategic Flood Risk Assessment (SFRA) needs to be undertaken to inform the Council's knowledge of flooding, refine the information on the Flood Map and determine the variations in flood risk from all sources of flooding across and from the Council's area. These should form the basis for preparing appropriate policies for flood risk management for these areas. The PPS says that the SFRA should be used to inform the Sustainability Appraisal (incorporating the SEA Directive) of the Local Development Framework and will provide the basis from which to apply the Sequential Test and Exception Test in the allocation of sites. The Draft Practice Guide to PPS 25 (published February 2007). gives advice on the preparation of the SFRA in sections 2.28 to 2.47. We would be pleased to discuss this with you.

In SA Objective 20, we would like to see water resources included.

In relation to the Foxhall area, most of this is within Flood Zone 3 (High probability having a 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year) in our Flood

Environment Agency
PO Box 519, Lancashire, South Preston, PR5 8GD.
Customer services line: 08708 506 506
Email: enquiries@environment-agency.gov.uk
www.environment-agency.gov.uk
Cont/d..

Maps, issued in September 2007 (see attached map). An SFRA, as discussed above, is, therefore required.

Yours faithfully

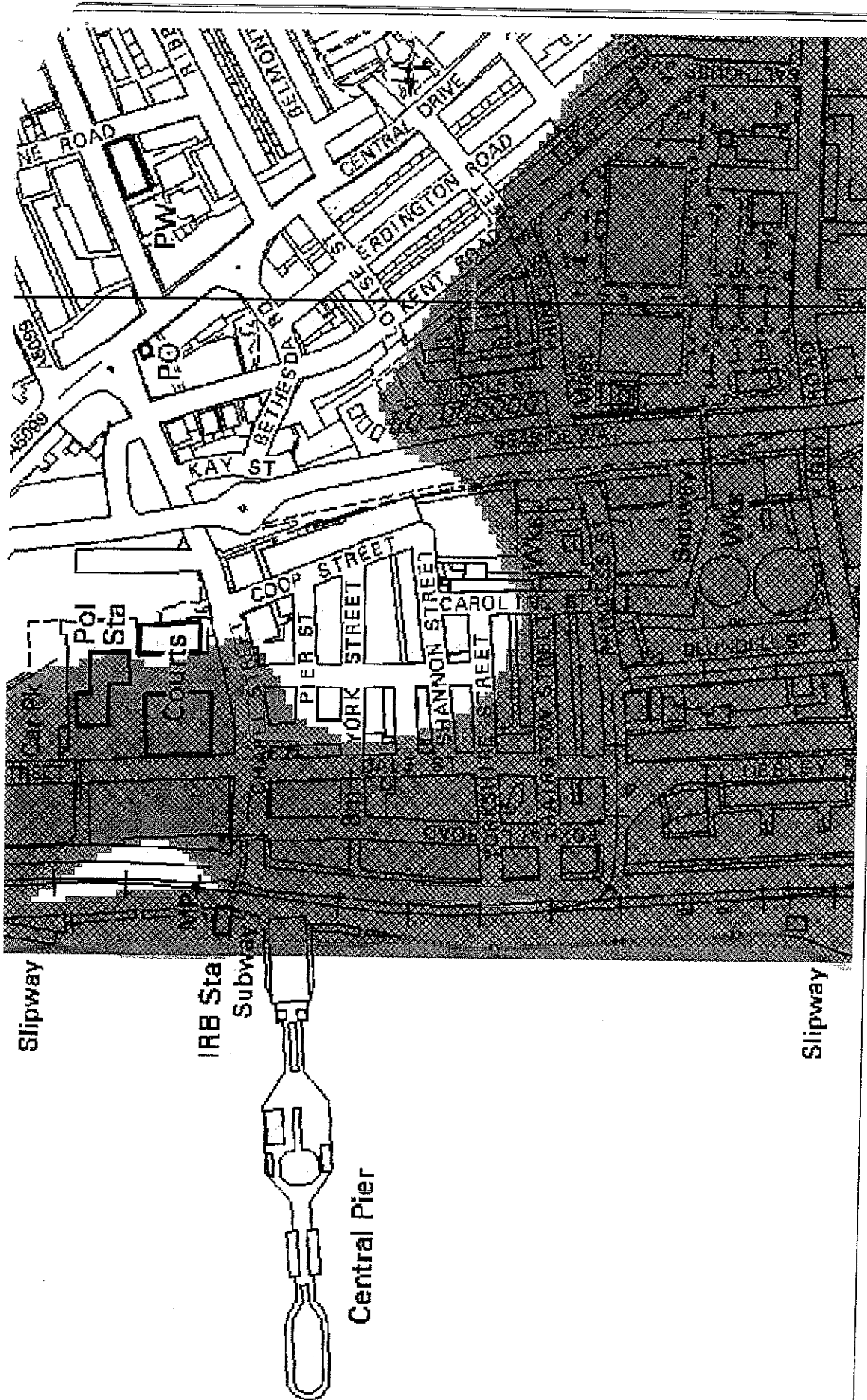
IAN SOUTHWORTH
Planning Liaison Officer

Direct dial 01772 714043

Direct fax 01772 697032

Direct e-mail ian.southworth@environment-agency.gov.uk

End



Note:
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Scale 1:3,876

Flood Zone 2 (Medium Probability comprising land assessed as having between a 1 in 100 and 1 in 1000 annual probability of river flooding (1% - 0.1%) or between a 1 in 200 and 1 in 1000 annual probability of sea flooding (0.5% - 0.1%) in any year) - Blue Area

Flood Zone 3 (High probability having a 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year) - Hatched Area



ENVIRONMENT
 AGENCY

Figure

Date: 13 December 2007
Our ref: JFB/NW/
Your ref:



Mr. T. Brown,
Chief Planning Officer,
Blackpool Council,
Municipal Buildings,
Corporation Street,
Blackpool,
FY1 1LZ

Regional Advocacy &
Partnerships (NW)
3rd Floor
Bridgewater House
Whitworth street
Manchester
M1 6LT

T 0161 237 1061
F 0161 237 1062

Dear Sirs,

**BLACKPOOL COUNCIL
LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY AND
FOXHALL AREA ACTION PLAN (AAP) SUSTAINABILITY APPRAISAL
(SA) SCOPING REPORT**

Natural England has been formed by bringing together English Nature, the landscape, access and recreation elements of the Countryside Agency and the environmental land management functions of the Rural Development Service. We are working towards the delivery of our purpose to conserve, enhance and manage the natural environment for the benefit of current and future generations.

Thank you for your consultation received on 20 November 2007 attaching a copy of the Sustainability Appraisal Scoping Report for the Core Strategy and the Foxhall AAP as detailed above. We welcome this opportunity to comment and whilst attending to consultation questions on the specific documents we have also provided comment concerning Habitats Regulations Assessment and the Biodiversity Duty.

Core Strategy Sustainability Appraisal Scoping Report

Habitats Regulations Assessment (HRA)

Amendments are being made to the Habitats Regulations to reflect recent clarification of the status of land-use plans as 'plans or projects' under Article 6(3) & 4 of the Habitats Directive. Natural England is awaiting further guidance on how Habitats Regulations assessment procedures will need to be applied specifically in the case of Local Development Frameworks. In general terms, this means that if a land-use plan is likely to have a significant effect, alone or in combination, on one or more European sites (SACs, SPAs) it must be subject to an 'appropriate assessment'.

We recommend that consideration be given to Habitats Regulations Assessment requirements at an early stage in the development of your

Natural England
Head Office
1 East Parade
Sheffield S1 2ET

Core Strategy, and look forward to your consultation on the screening report in due course. We will be pleased to discuss this further if required.

Biodiversity Duty

Biodiversity is a core component of sustainable development, underpinning economic development and prosperity, and has an important role to play in developing locally distinctive and sustainable communities. From 1 October 2006, all local authorities and other public authorities in England and Wales have a Duty to have regard to the conservation of biodiversity in exercising their functions. The Duty aims to raise the profile and visibility of biodiversity, to clarify existing commitments with regard to biodiversity and to make it a natural and integral part of policy and decision making. Guidance is available in Defra publication, Guidance for Local Authorities in Implementing the Biodiversity Duty, <http://www.defra.gov.uk/wildlife-countryside/pdfs/biodiversity/la-guid-english.pdf>

The Duty is set out in Section 40 of the Natural Environment and Communities Act (NERC) 2006 and states that:

“Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”. This is a new duty for Local Authorities and we would expect to see references to it in all relevant planning documents including the Core Strategy and its SA.

Review of Relevant Plans, Policies and Programmes

We welcome and acknowledge inclusion of PPS1; PPS9; PPG17 and PPS22 in the list.

We also suggest that you consider inclusion of the following documents within the list of relevant plans/policies and programmes (Appendix A) in the Scoping Report:

- Conservation (Natural Habitats & C) Regulations 2006
- Natural Environment and Communities Act (NERC) 2006
- Guidance for Local Authorities on Implementing the Biodiversity Duty. (Defra, 2007) <http://www.defra.gov.uk/wildlife-countryside/pdfs/biodiversity/la-guid-english.pdf>
- PPS 7 Sustainable Development in Rural Areas;
- PPS9's accompanying Good Practice Guide;
- North West Green Infrastructure Guide 2007. North West Green Infrastructure Think Tank
- Accessible Natural Green Space Standards in Towns and Cities. (2003) Natural England (English Nature) <http://www.english-nature.org.uk/pubs/publication/PDF/526.pdf>

Baseline Information

We would like to take this opportunity to share with you the information and indicators that are available from us. In relation to our environmental interests and the baseline information this includes:

- Protected Landscapes - boundaries of National Parks, Areas of Outstanding Natural Beauty (AONBs) and the location of Heritage Coasts;
- State of the Countryside information; and Countryside Quality Counts, including the boundaries of Character Areas of England;
- National Trail and Access information; and
- Nature Conservation, Biodiversity and Geodiversity.

There are various information sources for this data and links can be found from our web site at www.naturalengland.org.uk. Another useful source is www.magic.org.uk, which is a web-based interactive map, bringing together geographic information on key environmental schemes and designations in one place.

Natural England has a statutory duty under the Countryside and Rights of Way Act 2000 to prepare maps of all open countryside and registered common land in England, which have new rights of open access. Further information on this process, and copies of maps, can be found at www.openaccess.gov.uk.

You may also find useful the following web site: www.natureonthemap.org.uk. This is one of Natural England's interactive map sites. In the *MAPS* tab you will discover a choice of maps about nature, including National Nature Reserves, other kinds or protected sites and areas of semi-natural habitats.

National and Regional State of the Countryside Reports may help and are available via links on-line at www.naturalengland.org.uk. The State of the Countryside Reports provides facts and trends about the social, economic and environmental issues encountered in England's countryside. They present evidence against 20 key indicator themes, which include a number on environment and recreation:

- The state of natural resources – air quality, river quality;
- Biodiversity – wild birds, SSSI condition, Biodiversity Action Plans (BAPs);
- Sustainable land management – areas of woodland under sustainable management, woodland areas by species, countryside stewardship schemes, organic farmers, farm income trends;
- How people use the countryside – day visitors' activity, visitors' social characteristics, residents of the countryside, travel and transport use, trip expenditure, domestic tourism, tourism trip expenditure, tourism activities.

Countryside Quality Counts (CQC) may also be useful; the CQC project has developed an indicator of change in countryside quality based on

landscape character, in response to the 2000 Rural White Paper call for monitoring of changes in the countryside. Information on CQC is available via www.countryside-quality-counts.org.uk. Within the CQC project a set of Character Area Profiles for the Character Areas of England have been constructed which set out the key elements that give each area its sense of local distinctiveness, as well as the threats and opportunities facing those areas. The Character Area Profiles will be updated and extended to ensure that the information about the Character Areas, the threats and opportunities that exist in relation to sustaining their qualities, continue to be relevant to policy makers at national, regional and local scales.

If we can be of assistance in relation to baseline information do not hesitate to contact our web site as a first source of information
<http://www.naturalengland.org.uk/>

We welcome the information; and issues and opportunities raised concerning biodiversity in cited in 5.3.8, in particular, the desire to afford high levels of protection to all sites of potential nature conservation value. We would also welcome specific reference to the biodiversity values of brownfield sites and urban green spaces in this very urban borough.

5.3.10 covers landscape and we consider that it ought to make reference to townscape too. The report touches upon some areas of town being poor in condition and run down. Enhancement of these areas should be locally distinctive and respectful of local character, this should be reflected in the report as an issue and opportunity too, along with other relevant points including high standards of design and materials; and sustainable design and construction for all the Borough. We would welcome a landscape/townscape character approach to policy and we do consider that landscape and townscape data is lacking.

Appropriate text concerning the provision and accessibility of green space should be expanded in key issues and opportunities to support the text 'Urban greenspace is a key element in the regeneration of the borough and achieving renaissance'. The proximity of dwellings to good quality open space may also be an appropriate issue too. Our publication 'Accessible Natural Greenspace Standards in Towns and Cities' is relevant to this and may be useful. Missing is an opportunity to conserve and enhance green spaces for biodiversity, recreation, and mitigation of impacts of climate change.

The Core Strategy is an ideal opportunity for the Borough to move on and show that Blackpool is a leader of sustainable development and wants to improve the general quality of life in the Town.

Developing the Sustainability Appraisal Framework

We have the following comments to make concerning the Framework:

We welcome the reference to access to green space as a sub-objective to objective 3. We would also advise that provision of green space be included as a separate objective as well as being included as a sub-objective to Objective 12. Our 'Accessible Natural Greenspace Standards'

publication would provide guidance for indicators for the accessibility of green space.

We welcome SA Objective 12 but suggest that the word 'wildlife' be omitted from the second sub-objective and that 'legally protected species' be included too.

We are pleased to see inclusion of Objective 13 concerning landscape and townscape character and quality; however in the 3rd sub objective we do not consider that 'sensitive' is the correct choice of word. We consider that 'appropriate' would be a better term to use but a further sub objective relating to promotion of high quality design and materials; and locally distinctive design and materials ought to be included too. Again, we would welcome a landscape/townscape character approach to policy, and a local character assessment would establish a local baseline and provide useful indicators and targets for Table 6-3. There are indicators and targets needed for assessing the quality of development, this too could relate to the character assessments mentioned above.

Objective 22, sustainable transport, could also relate to Objective 8, (Tourism) and should develop joint indicators and targets relating to the use of public transport by visitors.

References to English Nature need to be omitted and Natural England quoted instead.

Foxhall AAP Sustainability Appraisal Scoping Report

We have no specific comments to make concerning this part of the document over and above our comments on the Core Strategy SA Scoping Report, as it relates to urban centre redevelopment and would not significantly affect our environmental interests. We note that some of the sub-objectives for the two documents are different. We would recommend that the wording of Objectives and Sub-objectives be consistent for all Sustainability Appraisal documents, even though we appreciate that not all objectives will need to be considered for all Development Plan Documents.

This concludes our comments at this stage. We should be pleased to offer any further assistance or information if required. We look forward to further opportunities to be involved in your work.

Yours faithfully,

Mrs Janet Belfield
Planning & Advocacy Team (North West)

☎ 0161 234 0218

✉ janet.belfield@naturalengland.org.uk

cc: Mandy North, Natural England, Government Team for Cheshire to Lancashire, Wigan Office.

Chris Blackburn

From: NELSON, Judith [Judith.Nelson@english-heritage.org.uk]
Sent: 20 December 2007 13:00
To: Chris Blackburn
Subject: LDF SA scoping report
Attachments: final draft v4.doc

Chris

I am afraid that I am unable to read in detail and respond to your above consultation by the deadline of 24th December. However I attach so far unpublished guidance which English Heritage has prepared on SEA/SA and the historic environment. I hope you find this useful and if in the New Year there is anything you would like to follow up on please contact me.

Judith

Judith Nelson
Regional Planner
English Heritage
Canada House
3 Chepstow Street
Manchester
M1 5FW

telephone 0161 242 1423



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