

Blackpool Council

Core Strategy Preferred Option

Consultation May-July 2010

Schedule of Representations



Chapter 1: Introduction

Resp No	Name/Company	Address	Comment	Council Response
Context				
0060	Fylde Borough Council	Town Hall Lytham St Annes	<p>Page 5, Figure 1: Request that St Annes and Lytham should be shown separately.</p> <p>Also, in trying to demonstrate the strong spatial linkages that exist to Wyre and Fylde suggests that the 'Blue route' should be shown on this figure.</p>	<p>Point accepted. Maps produced for the Revised Preferred Option show these places separately.</p> <p>Figure 1 is an introductory context plan showing the boundaries, main settlements, and major features of the existing transport network of the Sub-Region. The Core Strategy subsequently refers to ambitions for a number of additions and enhancements to the transport network, but the introductory plan is appropriately focused on existing key features and it is not appropriate to include a specific proposal. Reference to the proposal is included in policy (CS5 'Connectivity' and CS28 'South Blackpool Transport and Connectivity' in the Revised Preferred Option), along with the other key strategic improvements to the sub-regional transport network supported by Blackpool Council.</p>
Evidence Base				
0031	Sport England	Building 3 Universal Square Devonshire Street Manchester	<p>Appears that the evidence base in relation to open space, sport and recreation is currently incomplete. The evidence base for the Core Strategy on the Council's website does not include an open space, sport and recreation audit / assessment of needs.</p>	<p>The 2009 Audit will be made available on the Council's Core Strategy Evidence Base webpage. The detailed audit, as stated, sets out the quantum, quality, and accessibility of recreation open space provision across Blackpool, and provides a basis for but does not comprise a full assessment of current and future need in accordance with a PPG17 compliant assessment. The focus of the policy is appropriately informed by this detailed audit; and the focus of the Core Strategy</p>

Resp No	Name/Company	Address	Comment	Council Response
			Considers that the Core Strategy is weakened by its relationship to the saved policies in the Local Plan.	<p>on inner area regeneration and South Blackpool growth and enhancement is not compromised by its current limitations.</p> <p>Core Strategy policy provides an overarching statement of the Council's intent and commitment to protect, improve and enhance the quality and value of existing greenspace in Blackpool. The Core Strategy is supported by an appropriate evidence base and there is no conflict with saved Local Plan policies - which continue to provide further detail on the Council's consideration of development proposals for open space, sports and recreation.</p>
Sustainability Appraisal				
0060	Fylde Borough Council	Town Hall Lytham St Annes	<p>Page 47, Para 4.3.3 of the Sustainability Appraisal Report (SAR) states 'The proposals for substantial development near the terminus of the M55 motorway have been developed in conjunction with neighbouring Fylde Borough Council.' Fylde Borough Council officer representation on the M55 Hub Conceptual Master Plan Client Group has been purely part of a technical exercise which will be used to inform our Core strategy's preparation. Fylde Borough Council has not formally considered or agreed to develop proposals for substantial development near the terminus of the M55 motorway.</p> <p>The SAR acknowledges that the M55 Hub section within the Core Strategy 'contains the greatest number of policies that are potentially in conflict</p>	<p>This level of development is no longer being pursued by the Council. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>A number of amendments were made to the Core Strategy following the SA report and were incorporated in the document. However, this level of</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>with the SA Objectives' In recognition of the permanent adverse impacts the SA recommends that a number of mitigation measures be provided within the Core Strategy. No mitigation has been provided within the Preferred Option and I am not aware that an Infrastructure Plan has been prepared.</p> <p>The Preferred Option acknowledges that the main flood risk to Blackpool is from excessive storm-water events. This is combined with page 102, Para 2 which states 'the cumulative impact of further new development on the current combined system would have an adverse impact on the current network'. The seriousness of the adverse impact upon waste water management is not however quantified. It is recommended that you re-consult the Environment Agency (EA) on this matter as I understand the EA consider the potential adverse impact upon the waste water system to be a serious issue. If the Preferred Option is to be deliverable then more evidence is required to demonstrate how this impact is to be mitigated.</p> <p>I understand that Hyder undertook the Sustainability Appraisal (SA) on the basis that the M55 Hub would comprise a residential capacity of approximately 7,000 dwellings and 50 ha of employment land. Their appraisal considers the M55 Hub in Blackpool's terms given that it</p>	<p>development is no longer being pursued by the Council. A revised Sustainability Appraisal Report is being undertaken which reflects changes and will reassess the Revised Preferred Option of the Core Strategy. An Infrastructure and Delivery Plan is being prepared and will be completed in support of the Pre Submission edition of the Core Strategy.</p> <p>The level of development set out in the Preferred Option is no longer being pursued by the Council. Infrastructure limitations with respect to surface water and waste water are highlighted in Policy CS26 'South Blackpool Housing Growth' of the Revised Preferred Option, which sets out that housing development in South Blackpool needs to address surface water and waste water issues.</p> <p>The Infrastructure and Delivery Plan will set out the maximum information available from engagement with the EA and UU, and from the ongoing work on the Blackpool Surface Water Management Plan and the Central Lancashire and Blackpool Growth Point Water Cycle Study.</p> <p>The level of development set out in the Preferred Option is no longer being pursued by the Council. A Sustainability Appraisal will be undertaken for the Revised Preferred Option.</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>delivers the associated community facilities, district centre, schools, etc. It is now assumed a reduced number of dwellings are now proposed as referred to in the DLA Draft Final Report, whereby the critical mass which will deliver the associated facilities is diminishing too. I consider that the SAR would need to further consider the reduced outputs which may question whether the M55 Hub would remain as the most sustainable option based upon a reduced scale of development with less social infrastructure.</p>	

Chapter 2: Blackpool Issues and Influences

Resp No	Name/Company	Address	Comment	Council Response
Key Issues				
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade, Blackpool	Support the key issues to be addressed in the Core Strategy.	Comment noted.
0031	Sport England	Building 3 Universal Square Devonshire Street Manchester	There is no direct reference to open space issues on page 11. Given that final paragraph of the Mini Spatial Profile on page 9 states that much of the intensively built up inner area has little or no open space, is this lack of open space not regarded as an issue, or is it simply not seen as a key issue?	The Core Strategy recognises the lack of open space, particularly within the inner area and also the limited opportunities to directly address this, given the intensively built up existing urban area. Whilst this issue was set out in the Preferred Option, it is now specifically included as one of the key issues in the Revised Preferred Option. Policy CS6 'Green Infrastructure' is the key policy which aims to address this issue.
	Blackpool, Fylde & Wyre Economic Development Company		Identify additional key issues: <ul style="list-style-type: none"> - Low productivity being the primary threat to the successful economic growth and competitiveness of Blackpool and the Fylde Coast - Relatively low proportion of the Working Age Population in Blackpool - Low level of employment in higher GVA generating sectors 	It is agreed these are all key issues underlying Blackpool's economy as detailed in the supporting evidence base. The spatial portrait of Blackpool's economy has been redrafted in the Revised Preferred Option to include more detail and these issues are now encapsulated. Policy CS3 'Economic Development and Employment' is the key policy which aims to address these issues.
0038	Natural England	Hornbeam House Electra Way Crewe Business Park Crewe	Support the key issues however, raise concerns over the use of the term 'balancing' which suggests positive and negative effects. Would welcome change being managed in such a way as to secure development ensuring no net losses for the natural environment.	Comment noted, although Blackpool's geographical constraints means it must balance the need to plan for development against its tightly defined boundary and intensely built-up urban area. The Core Strategy identifies Blackpool's important natural landscape and proposes policies which ensure that any development protects - and where appropriate enhances - this character.

Resp No	Name/Company	Address	Comment	Council Response
0050	The Noble Organisation	1a Dukes way Court Team Valley Trading Estate Gateshead	The plan needs to recognise that new quality attractions must complement and not undermine existing facilities.	Comment noted. This issue regarding sustaining a high quality, year round visitor offer includes providing new high quality attractions, but does not exclude existing attractions which are also important to strengthen the resort appeal; indeed important existing tourist attractions are also supported in Core Strategy policy.
Linkages and Planning Policy Context				
0031	Sport England	Building 3 Universal Square Devonshire Street Manchester	This section would benefit from revision following the revocation of regional strategies.	This is recognised and the policy context is re-drafted in the Revised Preferred Option.
Spatial Profile				
0008	Ms Angelia Hinds	21 Moss House Road, Blackpool	Borough boundary is incorrect on Spatial Profile diagram (page 10)	Comment noted. All maps to be revised for the Revised Preferred Option.
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	Pleasure Beach appears to be omitted from the Main Tourist Areas designation in the Existing Spatial Profile. Unclear as to what the significance of this designation is, as it is not specifically referred to elsewhere in the document, with the possible exception of a reference on Page 59 in relation to movement within the resort.	The Plan is only an indicative illustration of the pattern of land uses within Blackpool, focused on the areas of holiday accommodation, and has no wider implications. It is superseded in the Revised Preferred Option with other, more focused plans. The Pleasure Beach is included in the Key Diagram.
0031	Sport England	Building 3 Universal Square Devonshire Street Manchester	Suggests that the Spatial profile is too limited in terms of the information it presents and should include information on the resident and visitor population of Blackpool, and how they are projected to change. Without this information it is difficult to assess the scale of change facing the area, or to get a handle on the impact that the visitor population has. Information on projected population change would allow the proposed	The Spatial Profile has been re-drafted in the Revised Preferred Option and now includes more detail on Blackpool's population, economy, housing and neighbourhoods, environment and transport issues. Issues are also identified in supporting documents and the evidence base.

Resp No	Name/Company	Address	Comment	Council Response
			levels of housing growth in the core strategy be set into context.	
0050	The Noble Organisation	1a Dukesway Court Team Valley Trading Estate Gateshead	Coral Island should specifically be identified in figure 2 in the Main Tourist Area as one of the resorts main attractions.	Figure 2 is only an indicative illustration of the pattern of land uses within Blackpool; no attractions are identified, It is superseded in the Revised Preferred Option with other, more focused plans.
0060	Fylde Borough Council	Town Hall Lytham St Annes	Page 10, Figure 2: The Borough Boundary is wrong between Squires Gate Lane and Yeadon Way.	Point accepted. Maps produced for the Revised Preferred Option show the correct boundary.

Chapter 3: The Spatial Development Framework: Vision and Objectives

Resp No	Name/Company	Address	Comment	Council Response
Spatial Objectives				
0001	Rashmi Pandav Blackpool Congregation of Jehovah's Witnesses	9 Lowthorpe Crescent Preston	4th objective, 2nd bullet point would benefit with the word "community" added. This would then read "meeting needs and aspirations for residents for new services and community facilities"	The objectives have been re-drafted in the Revised Preferred Option to provide greater clarity, including this particular objective which is now objective 8 and includes reference to 'community'.
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	Generally support the Spatial Objectives which the Council will seek to achieve by 2026. However, consider that the 4th bullet point under 'Sustainable regeneration, diversification and growth' should be amended from: 'Promoting integrated transport, travel and communications across Blackpool' to 'Promoting integrated transport, travel and communications across Blackpool and to maximise ease of access to Blackpool'	Comment noted. The objectives have been re-drafted in the Revised Preferred Option to provide greater clarity, including this particular objective which is now objective 4 and includes reference to 'enable easier and sustainable journeys within Blackpool and the Fylde Coast'. This objective is supported primarily by policies CS5 (Connectivity), CS21 (Arrival and Movement) and CS22 (Key Resort Gateways) in the Revised Preferred Option.
0015	Bourne Leisure		With regards to the Spatial Objectives, Bourne Leisure considers that planning policy is needed to support the enhancement of existing tourism accommodation and facilities as well as new tourism developments. The wording of the second spatial objective should be amended accordingly.	Comment noted. Core Strategy policy supports new tourist development as well as important existing attractions and accommodation. The objective has been re-drafted in the Revised Preferred Option to state ' <i>including new high quality attractions</i> ' - it does not exclude existing attractions which are also seen as important to strengthen the resort appeal
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	Maintains its support for the Spatial Objectives, however, considers they could be strengthened. Further emphasis should be placed on delivering a sustainable integrated transport system and reference should also be made to supporting a reduction in the need to travel particularly via the	Support noted. The objectives have been re-drafted in the Revised Preferred Option to provide greater clarity and local distinctiveness, including this particular objective - which is now objective 4 - and references integrating transport systems and promoting sustainable modes of travel.

Resp No	Name/Company	Address	Comment	Council Response
0038	Natural England	Hornbeam House Electra Way Crewe Business Park, Crewe	private car. Support these objectives particularly objective 4.	Support noted.
0050	The Noble Organisation	1a Dukesway Court Team Valley Trading Estate Gateshead	Suggests that leisure and entertainment should be specifically identified to the objective under 'Sustainable regeneration, diversification and growth' as it is fundamental to achieving this objective. Under the 'maximising regeneration' objective, reference should be made to the traditional family based leisure offer that the resort depends on. Disappointed no reference is made to the important role amusement arcades play and that they should be supported and improved.	'Sustainable regeneration, diversification and growth' was the over-arching objective in the Preferred Option (now the overarching goal in the Revised Preferred Option). Agree that leisure and entertainment has a key role and this is reflected throughout the Core Strategy; including objectives 14 and 15 of the Revised Preferred Option. Their importance is fully understood and accepted, but it is not appropriate to identify more detailed specific uses such as amusement arcades, any more than many other important leisure attractions.
Spatial Vision				
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	Support the Spatial Vision of a New Blackpool to be delivered by the Core Strategy.	Comment noted.
0015	Bourne Leisure Ltd		Bourne Leisure supports the spatial vision for Blackpool. Suggests that reference should be made to Blackpool being the main tourism centre of the Fylde Coast.	Comment noted. Blackpool's tourism status is considered of national significance and this is strengthened in the re-drafted vision for the Revised Preferred Option.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	General support for the Vision. Welcomed the reference to providing safe and easy access through the provision of an integrated transport system, but recommended that this should be strengthened by referring to a 'sustainable' integrated transport system. This amendment	Support noted. The vision now includes reference to 'sustainable' integrated transport system.

Resp No	Name/Company	Address	Comment	Council Response
			would strengthen the sustainability credentials of the Vision.	
0031	Sport England	Building 3 Universal Square Devonshire Street Manchester	Supports the objective 'of meeting sport and recreational needs' under A Balanced Healthier and Greener Blackpool. However, recommend in light of this aim that that the vision is also altered to explicitly reference sport	Support noted. The vision now includes reference to 'sport'.
0035	Blackpool, Fylde & Wyre Economic Development Company		States the vision could better acknowledge the need to diversify Blackpool's economy placing slightly less emphasis on the visitor economy and more on growing vibrant, knowledge-based sectors for the future. Suggest that reference to 'state of the art conferencing facilities' is replaced with terms like 'modern' and 'contemporary'. States there needs to be more emphasis on people and skills	The vision references the importance of the visitor economy as well as a more diverse economy. The importance of economic diversification has been strengthened in the re-drafted vision to reflect this balance better. State of the art is replaced with the terms 'quality' and 'innovation'. The vision makes reference to skills and aspiration; which has been strengthened.
0038	Natural England	Hornbeam House Electra Way Crewe Business Park, Crewe	Do not consider enough is said about the natural environment. Vision should identify that all environments both urban and natural are conserved and enhanced.	Reference to the natural environment, climate change and sustainable development is strengthened in the re-drafted vision.
0046	Wyre Borough Council	Civic Centre Breck Road Poulton-le-Fylde	Suggest the opportunity is made to take a much more positive approach to the role of tourism and the resort, and to stress its national importance as the number one seaside resort in the UK. This could include a context map showing Blackpool's position within the UK and its accessibility from all corners of the country.	The Core Strategy recognises Blackpool's national tourism status; although it is agreed that including it in the vision would reinforce and this positive attribute.

Resp No	Name/Company	Address	Comment	Council Response
Spatial Vision/Objectives				
0058	North West Regional Development Agency	Renaissance House Centre Park Warrington	<p>Welcomes and supports the spatial vision and objectives however does not consider the separate vision set out in Chapters 5 and 6 to be necessary and suggest they are incorporated in the overarching spatial vision.</p> <p>Suggests that the word 'stable' is removed from the sentence 'Blackpool will have a stable and growing population' as the two words are contradictory.</p>	<p>Support noted. Whilst these separate visions describe specifically the aspirations for resort regeneration and supporting growth on the edge of Blackpool, it is agreed they should be brought together in one overarching spatial vision.</p> <p>Blackpool's circumstances of inner area decline, housing market imbalance, social and economic deprivation and high levels of transience, means there is a need to address these issues. In these terms, these aspirations are not contradictory. However, this will be articulated better in the re-drafted vision to avoid confusion.</p>

Chapter 4: The Spatial Strategy: Regeneration, Diversification and Growth

Resp No	Name/Company	Address	Comment	Council Response
Key Diagram				
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	<p>The area shown defined as ‘Inner Area Regeneration’ is rarely referred to elsewhere in the Core Strategy and where it is referred to it is not clear if this is specifically referring to this specific area of the town as it is never capitalised elsewhere in the document.</p> <p>The focus on Key Resort Gateways is supported. However, the three gateways referred to on the Key Diagram are all directed away from Pleasure Beach and South Beach. Request the inclusion of a fourth Key Resort Gateway from Yeadon Way to Pleasure Beach/South Beach, reflecting the importance of Pleasure Beach as an attraction within Blackpool and the need to enhance the visitor experience on arriving in Blackpool and travelling to this destination by car, public transport or on foot.</p> <p>Are pleased to see ‘Blackpool Pleasure Beach’ specifically identified on the Key Diagram. However, this does not appear to be carried through to any specific policies or objectives.</p>	<p>The Key Diagram reflects the main focus on Regeneration and Supporting Growth, however clarity on “inner area regeneration” will be provided in <i>Policy CS1: Strategic Location of Development</i> of the Revised Preferred Option. In addition the key and map will be amended to provide further clarification.</p> <p>Central Corridor is one of the key resort gateways referred to as a key strategic gateway to Blackpool. It includes Seasiders Way and car parking close to the Pleasure Beach and adjacent to the area defined as South Beach. The Core Strategy promotes improved vehicular and pedestrian linkages through the Corridor and improved parking and reception facilities; and this is considered sufficient to address this issue.</p> <p>The Pleasure Beach is identified on the Key Diagram reflecting its key role as an anchor attraction. Whilst there are no specific policies or objectives related to the Pleasure Beach itself, its overwhelming importance is integral to - and is recognised - in a number of policies, including leisure and business tourism (CS20) and arrival and movement (CS21).</p>
0036	Closelink Ltd		Consider the diagram should show the full extent of the suggested strategic allocations in both Blackpool and Fylde areas	The Key Diagram can only reflect strategic allocations within the Blackpool Borough. Allocations within Fylde will be determined by Fylde Council. Blackpool’s Core Strategy will need to align with the policy framework

Resp No	Name/Company	Address	Comment	Council Response
				of neighbouring authorities and the Council will co-operate with them on strategic planning issues as required by the Duty to Co-operate.
0038	Natural England	Hornbeam House Electra Way Crewe Business Park Crewe	Concerned regarding the lack of environmental data in the diagram. Would welcome revisions to show parks and green space, rights of way, designated sites, local nature reserves, and data from the Biodiversity Action Plan.	The Key Diagram focuses on the strategic priorities of the Core Strategy, including the broad locations that will be the main focus for strategic development. Some contextual information is included; and we will consider adding a layer to illustrate Blackpool's green infrastructure; although this must not detract from the strategic priorities. A separate green infrastructure map will be included in the Revised Preferred Option to provide more detailed information; in addition, this detail is shown on the Proposals Map.
0050	The Noble Organisation	1a Dukesway Court Team Valley Trading Estate Gateshead	Town Centre Leisure Frontage and Promenade Frontage should be shown on the key diagram.	The Key Diagram focuses on the strategic priorities of the Core Strategy. This includes the resort core and town centre. Whilst the Town Centre Leisure Frontage and Promenade Frontage are located within these areas, it is not appropriate to specifically show them on the Key Diagram. Furthermore, both the Town Centre Leisure Frontage and Promenade Frontage are shown on the Proposals Map.
Policy S1: Strategic Direction and Location of Development				
0001	Rashmi Pandav Blackpool Congregation of Jehovah's Witnesses	9 Lowthorpe Crescent Preston	In the paragraph commencing 'Tourism and leisure.....' Suggests the paragraph should expressly state the need for 'community facilities' Suggests reference is made to the secondary use of surplus/unused/derelict industrial or commercial land for community uses.	This is a key strategic policy which deals with the dual strategy focus on regeneration and supporting growth. Other policies adequately deal with the provision of community facilities including Policy CS11: Sustainable Neighbourhoods in the Revised Preferred Option. The Core Strategy proposes to continue to safeguard existing industrial / business land for employment uses due to the overriding shortage of employment sites in

Resp No	Name/Company	Address	Comment	Council Response
				the Borough. However, outside these defined areas, saved Policy DE4 of the Blackpool Local Plan (2006) permits the appropriate re-use of existing industrial buildings where this would result in wider environmental / community benefits; this could include community uses. New community uses are also promoted by a number of Core Strategy and saved Local Plan policies.
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	<p>Clarification required as to whether 'town centre and resort core' is a reference to Inner Area Regeneration on the adjacent Key Diagram. Suggest that 'town centre and resort core' in Policy S1 should be replaced with 'Inner Area Regeneration, as defined on the Key Diagram' to provide clarity to investors.</p> <p>This area should include the Pleasure Beach, which will be a major catalyst of resort regeneration.</p>	<p>The Key Diagram illustrates Policy S1 (re-numbered Policy CS1 in the Revised Preferred Option) and the dual strategy focus on regeneration and supporting growth. Both the key diagram and policy have been amended to provide clarity and the terminology used is now consistent.</p> <p>The Inner Area Regeneration focus comprises (amongst other things) the main resort attractions within the Resort Core, which includes the Pleasure Beach; and this is shown on the Key Diagram.</p>
0020	Lancashire County Council	County Hall PO Box 100 Preston	The overall approach is welcomed and reflects that set out in our response to the Issues and Options consultation. The success of the Core Strategy will be dependent on linking the regeneration of Blackpool's urban core to the planned growth at M55 Hub	Comment noted. Whilst the Revised Preferred Option no longer proposes housing on remaining lands at Marton Moss, it remains important to link the delivery of new development in South Blackpool with resort regeneration to create more sustainable housing markets, and provide a complementary offer to avoid competition within Blackpool's housing market.
0025	Mr John Ashworth	Runnell Farm Chapel Road Blackpool	The redevelopment of Inner Blackpool is supported and this can be assisted financially by a contribution from the developers at Marton Moss.	Comment noted. Whilst the Review Preferred Option no longer proposes housing on remaining lands at Marton Moss, it remains important to link the delivery of new housing development in South Blackpool with regeneration, including commuted sums payments.

Resp No	Name/Company	Address	Comment	Council Response
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	<p>Supportive of providing new development within the existing centre and resort core, where existing sustainable transport networks and services are already present and where the need to travel, particularly by private car is minimised.</p> <p>Has greatest concern in terms of the M55 Hub proposals for the sustainable accessibility of the area as it is currently poor and the scale of development proposed is likely to generate a significant number of trips, which given the sites proximity to Junction 4 of the M55, could be detrimental to the safe and efficient operation of the Strategic Road Network.</p> <p>Considers that it is even more critical that the potential impact of development is assessed and the delivery and requirements of infrastructure are determined to ensure that the strategy as a whole is not compromised by undeliverable and unsustainable strategic development.</p> <p>The Agency is aware of the modelling work being undertaken in order to test the development impact and consider the scale and type of associated transport provisions and expect that this information will be made available to review as soon as possible and particularly prior to consultation on the Publication draft.</p>	<p>Comments noted.</p> <p>The level of development now proposed at South Blackpool is reduced; and does not include any housing allocation on remaining lands at the Moss. A neighbourhood planning approach is now being promoted for the Moss which will support the retention and enhancement of the distinctive Moss character whilst identifying those circumstances where development may be acceptable.</p> <p>The Revised Preferred Option will be subject to a Sustainability Appraisal (SA) which will assess the potential individual and cumulative impacts of the level of development proposed. Infrastructure issues will be dealt with through the Infrastructure and Delivery Plan or the Duty to Co-operate.</p> <p>Notwithstanding the above, specific further work was undertaken to test the impact of various levels of development in South Blackpool in conjunction with the Highways Agency and Lancashire County Council.</p>
0033	National Grid		Support the identification of the M55 Hub as a focus for growth and expansion.	Noted. Lands at Junction 4 of the M55 will continue to be identified as a focus for sub-regional growth

Resp No	Name/Company	Address	Comment	Council Response
0036	Closetlink Ltd		<p>Fully support this policy specifically reference to the M55 Hub as a strategic location for growth and expansion.</p> <p>Cross boundary recognition should be made.</p>	<p>through the Duty to Co-operate.</p> <p>Noted. Lands at Junction 4 of the M55 will continue to be identified as a focus for sub-regional growth through the Duty to Co-operate.</p> <p>Reference is made to cross-boundary issues in the Introduction, Chapter 8, and Policy CS5: Connectivity (which focuses on key strategic improvements to the sub-regional transport network).</p>
0038	Natural England	Hornbeam House Electra Way Crewe Business Park Crewe	<p>Welcome a specific policy that directs development to particular parts of Blackpool.</p> <p>Broadly support policies to promote urban concentration. However, not supportive of policies that may lead to loss of urban gardens and other greenspace.</p> <p>The requirement for on site Public Open Space should only be relaxed where there is a clear plan to provide new open space in a suitably accessible location. Would welcome a link to the green infrastructure policy</p>	<p>Comment noted.</p> <p>Policy CS6: Green Infrastructure aims to protect, enhance, expand and connect green infrastructure and biodiversity networks in Blackpool; Policy CS7: Quality of Design requires new development to provide appropriate green infrastructure, including green spaces, landscaping and quality public realm.</p> <p>Comment noted. As the Core Strategy policies will be read as a whole and not in isolation, it is not necessary to repeat specific reference to green Infrastructure in this Policy.</p>
0050	The Noble Organisation	1a Dukesway Court Team Valley Trading Estate Gateshead	<p>State that the policy is too vague and should not be applied to frustrate the improvement of existing facilities.</p>	<p>The policy introduces the overarching dual strategy focus of the Core Strategy; further detail of this dual focus is provided in Chapters 7 (Regenerating Blackpool Town Centre and Resort Core) and 8 (South Blackpool Growth and Enhancement) which include policies to support the enhancement of existing facilities.</p>

Resp No	Name/Company	Address	Comment	Council Response
			All development needs to be realistic and deliverable.	The Infrastructure and Delivery Plan produced for the Pre-Submission document will address this issue.
0055	Gillian Wilsden	82 Withnell Road Blackpool	Concerned that there is very limited open space, and there is a danger that very soon Blackpool will have no green areas at all, and eventually there will be no distinguishing areas between destinations. Whilst I appreciate that more housing is required, it seems a shame that existing areas cannot be utilised instead of Green Belt disappearing for ever.	The Revised Preferred Option does not allocate any development on Green Belt or on the remaining undeveloped lands at Marton Moss. With respect to green open space, Policy CS6: Green Infrastructure aims to protect, enhance, expand and connect green infrastructure networks.
Policy S2: City of the Beach				
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	Clarification is required with regards to 'town centre', 'resort core' and 'inner area holiday and residential' with regards to the key diagram and the Pleasure Beach included in the 'resort core'. Supports the need to sustain a year round town centre and resort offer and the need for new attractions etc whilst support existing attractions and facilities.	This policy is now merged with Policy S1 (re-numbered Policy CS1 in the Revised Preferred Option). The Key Diagram illustrates Policy CS1 and the dual strategy focus on regeneration and supporting growth. Both the key diagram and policy are amended to provide clarity. The Inner Area Regeneration focus comprises (amongst other things) the main resort attractions within the Resort Core, which includes the Pleasure Beach; and this is shown on the Key Diagram. Support noted.
0015	Bourne Leisure Ltd		Whilst Bourne Leisure accepts the need to rebrand Blackpool, the company strongly considers that policies for regeneration, diversification and growth should recognise the importance of tourism outside those which are defined in Policy S2 and should recognise the contribution of these other areas to Blackpool's tourism profile and the local economy.	The focus of Policy S2 is on the town centre and resort core. Policy CS20: Leisure and Business Tourism recognises the value of outdoor leisure facilities away from the resort core, including the Marton Mere Caravan Park, which complement Blackpool's overall tourism offer.
0042	Mr Christian Cox	6 Ravenwood	Supportive of this policy. Wants to see a more	Support noted.

Resp No	Name/Company	Address	Comment	Council Response
		Avenue Blackpool	vibrant upmarket town for the 21st Century.	
0050	The Noble Organisation	1a Dukesway Court Team Valley Trading Estate Gateshead	Should recognise and support the traditional amusement offer which will continue to be a mainstay of the resort.	This policy provides an overarching spatial focus on the resort core and town centre. It is now combined with CS1 and includes reference to attractions. Further detail of this spatial focus is provided in other policies, including Policy CS20: Leisure and Business Tourism, which supports the improvement and enhancement of important existing tourist attractions. It is unnecessary and inappropriate to refer to specific attractions in either Policy. Furthermore, the important role of amusements is detailed in supporting text to Saved Policy RR4 of the Blackpool Local Plan (2006)
0052	North and Western Lancashire Chamber of Commerce	1-2 Lockheed Court Amy Johnson Way Blackpool	Raises concerns regarding the amount of funding required to deliver the transformational change set out in the Core Strategy.	Point noted. The impact of public funding priorities is recognised may impact on the scale of regeneration that can be delivered. The Core Strategy period is to 2027, and the aspiration remains to maximise such change. Market provision will potentially also increase with the pace of Blackpool's wider regeneration.
0054	Ms Vicki Gale	22 Alexandra Road Blackpool	Supports the objective however, states that it will require the quality of the connection between the town centre and the roads leading off to the front to be maintained. Concerned that this may not happen if key roads such as Crystal, Alexandra, Shaw and others are removed from the holiday area without a guarantee of alternatives to retain the quality of that link.	Support noted. Policy R17 (re-numbered CS22) focuses on the need for improvement and remodelling of key resort gateways leading to the town centre and seafront. Policies R18, R19, and R20 (re-numbered CS23 and CS24) aim to enhance the holiday accommodation offer in the resort; as well as manage change and restore confidence to create mixed residential and holiday neighbourhoods.
Policy S3: Housing Need				
0013	Blackpool LSP Environment Sub Group	Lutra House Dodd Way Walton Summit	Given that the regional housing targets have been scrapped with the cancellation of the Regional Strategy, the group question whether this level of	The main focus, in terms of housing numbers, is on regeneration and on sites within the existing urban area. The housing numbers have been reviewed and a

Resp No	Name/Company	Address	Comment	Council Response
		Preston	<p>housing provision to 2026 is still required. They raise concerns that the development industry will choose to develop the 'easy' (Greenfield) sites in preference to the regeneration of the urban core. Future housing provision must be delivered in accordance with Policy S4 to ensure that the regeneration of the urban core takes place.</p> <p>Would like to see a commitment that existing permissions and regeneration/SHLAA sites are developed before further development takes place at Marton Moss beyond 2016.</p>	<p>substantial reduction made to the proposed level of new housing in Blackpool following the Government's announcement of the proposed end of regional housing targets and this also reflects the realities of the current housing market.</p> <p>The level of housing development for the Moss set out in the Preferred Option is no longer being pursued by the Council.</p> <p>The Revised Preferred Option has been fully redrafted and no longer includes policy S4.</p>
0020	Lancashire County Council	County Hall PO Box 100 Preston	Provision for housing has been based on the annual provision set out in the revoked RSS. If these figures are to form the basis of the Core Strategy taken forward to examination stage, then they will to be supported by an appropriate evidence base.	The figures have been reviewed following the Government's proposed revocation of RSS housing targets and the revised figures are supported by an ongoing and updated evidence base.
0024	Hay Hill Ltd	18-22 Wigmore Street London	Concern raised in relation to the accuracy of draft housing figures which were contained in the now revokes NWRSS	The figures have been reviewed following the Government's proposed revocation of RSS housing targets and the revised figures are supported by an ongoing and updated evidence base.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	The Agency was previously supportive of delivering new residential development in line with RSS requirements and it is expected that whatever local housing target is taken forward, either based on existing provisions, reverting back to Option 1 Figures, or a new approach, that it is based on robust evidence and is commensurate with an identified level of need and able to be sustainably delivered.	The figures have been reviewed following the Government's proposed revocation of RSS housing targets. The revised figures are supported by an ongoing and updated evidence base.

Resp No	Name/Company	Address	Comment	Council Response
			<p>The Agency's main concern is that new housing development is sustainably accessible and is therefore generally supportive of providing new residential development within the Central Blackpool inner area, where there is best access to a variety of sustainable transport options, employment opportunities, services and facilities. The Agency is also supportive of focussing higher density housing development along the main sustainable transport corridors and at key transport hubs and interchanges.</p> <p>The proposal for 2,700 new dwellings at the M55 Hub provides greatest concern for the Agency given its proximity to the Strategic road network (SRN). The scale of housing proposed considered independently could have the potential to generate a significant number of trips and cumulatively with other proposals such as new employment opportunities, this is only going to exacerbate this issue. It is therefore important to ensure that any measures such as new or improved sustainable transport provisions or infrastructure are sufficient to accommodate or mitigate the potential cumulative impacts of development. The Agency will be able to provide further detailed comment as and when the traffic modelling work is made available for review.</p>	<p>The level of housing development for the Moss set out in the Preferred Option is no longer being pursued by the Council. The key emphasis in the Revised Preferred Option is that of maximising regeneration in the Inner Areas.</p> <p>Although the Council is no longer proposing the levels of housing on the Moss as for the Preferred Option, a traffic impact assessment was undertaken to test the impact of the development previously proposed in consultation with the Highways Agency and Lancashire Council.</p>
0031	Sport England	Building 3 Universal Square Devonshire Street	It is likely some potential locations and / or sites include playing fields or other land and buildings used for sport and recreation.	The requirements are noted in relation to the potential future development of all sites; however PPG17 has now been superseded by the National

Resp No	Name/Company	Address	Comment	Council Response
		Manchester	<p>Sport England emphasise here that PPG17 states that existing open space, sports and recreational buildings and land should not be built upon unless an assessment has been undertaken which has shown the land or buildings to be surplus to requirements, or replacement open space, sport or recreational facilities are provided. With regards to playing fields, PPG 17 and Sport England's Playing Field Policy oppose development of playing fields in the absence of a PPG17 compliant robust assessment of need unless the requirements of specific exceptions are met.</p> <p>The exact impact of the protection offered by PPG17 to locations identified in the core strategy and sites included within the various supporting studies is unclear without reviewing each individual site. Unfortunately, we do not have the resource to undertake such a task. In light of this, Sport England would make the point that some locations and sites which have been identified for development, say to meet employment or housing land requirements, might themselves need replacement provision, and that land requirements for such replacement provision should be made explicit either in the studies, and / or in broad terms in the core strategy.</p>	Planning Policy Framework.
0035	Blackpool, Fylde & Wyre Economic Development Agency		State the proposed figures appear to based on NWRSS 2008 requirements which have now been revoked. An alternative methodology will need to	The figures have been reviewed following the Government's proposed revocation of RSS housing targets and the revised figures are supported by an

Resp No	Name/Company	Address	Comment	Council Response
			be identified.	ongoing and updated evidence base.
0036	Closetlink Ltd		Fully support the inclusion of the M55 Hub as a strategic development site and the reference to the number of dwellings to be accommodated. However they re-iterate the cross boundary nature of the development.	Comment noted. The level of development now proposed at South Blackpool is reduced and does not include any housing allocation on remaining lands at the Moss. However, lands at Junction 4 of the M55 will continue to be identified as a focus for sub-regional growth; supported through the Duty to Cooperate which will address cross-boundary issues.
0037	Muse Developments Ltd		States that the Talbot Gateway redevelopment including an element of new housing will not only assist the Council in achieving its housing targets but will also contribute to achieving the wider objective of re-using Brownfield sites.	Comments noted.
0057	Government Office Northwest	City Tower Piccadilly Plaza Manchester	<p>Notes that Policy S3 includes a 1000 windfall allowance for conversions, for dwellings expected to be created as a consequence of Blackpool's declining guest house areas.</p> <p>PPS3 para 59 states that allowances for windfalls should not be included in the first 10 years of land supply unless LPAs can provide robust evidence of genuine local circumstances that prevent specific sites being identified.</p> <p>In these circumstances, an allowance should be included but should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends.</p> <p>We recommend that, if there are genuine local circumstances that prevent specific sites being</p>	The basis for a conversions windfall allowance is fully justified given the specific and unique characteristics of Blackpool's housing market. The allowance made has full regard to a detailed analysis of historic delivery rates and expected future trends, with evidence set out in Blackpool's Housing Monitoring Report and other supporting documents.

Resp No	Name/Company	Address	Comment	Council Response
			identified in years 5 to 10, you provide more justification, in line with PPS3 para 59.	
0058	North West Regional Development Agency	Renaissance House Centre Park Warrington	The Council will need to have regards the revocation of the RSS figures in restabilising the level of housing provision required.	The figures have been reviewed following the Government's proposed revocation of RSS housing targets and the revised figures are supported by an ongoing and updated evidence base.
0060	Mr M Evans Fylde Borough Council	Town Hall Lytham St Annes FY8 1LW	<p>RSSNW is no longer relevant and it is recommended that emerging policies be reviewed in light of the forthcoming national planning policy framework. There is an opportunity for Blackpool Council to review the level of growth it was striving to accommodate. In particular the revocation of top-down regional housing targets require housing need to be justified both locally and in a sub-regional context. This clearly has implications for the M55 Hub Growth Point.</p> <p>Policy S3 provides for 10,800 dwellings against a requirement of 10,200 dwellings. Whilst being mindful of Blackpool's tight boundary, there appears to be no justification for the uplift of 600 dwellings.</p>	<p>The figures have been reviewed following the Government's proposed revocation of RSS housing targets and the revised figures are supported by an ongoing and updated evidence base.</p> <p>With regard to the potential for wider development at the M55 Hub, the Core Strategy fully recognises this is a matter to be determined by Fylde Borough Council as part of its own evolving Core Strategy process and in accordance with the 'Duty to Co-operate. Reflecting the wider impact of the housing market downturn, as well as Fylde Borough Council's expressed concerns, the presentation of the revised and updated Blackpool Core Strategy proposals has been revised to much more clearly refocus the proposals on South Blackpool itself, as against reference to the "M55 Growth Point" in the Preferred Option document.</p>
Policy S4: Phased and Balanced Housing Market				
0020	Lancashire County Council	County Hall PO Box 100 Preston	<p>This approach is welcomed although it needs to be reflected in policy G5, which appears to suggest that affordable housing should be provided on site.</p> <p>Overall the relationship between the edge of</p>	<p>Comments noted. Policy G5 refers in the supporting text to the alternative of a commuted sum contribution in part or in full in lieu of on-site provision Further clarification has been made in Revised Core Strategy policy CS13 'Affordable Housing'.</p> <p>The main focus, in terms of housing numbers, is on</p>

Resp No	Name/Company	Address	Comment	Council Response
			town growth and urban regeneration needs to be set out further within the LDF, possibly through the proposed joint DPD with Fylde Council regarding the hub proposal.	regeneration and on sites within the existing urban area. The housing numbers have been reviewed and a reduction made to the proposed level of new housing in Blackpool following the Government's announcement of the proposed end of regional housing targets, and also reflecting the realities of the current housing market.
0026	Highways Agency		The Agency considers that in addition to phasing the future release of housing sites in accordance with Blackpool's dual focus on regeneration and growth, that new housing sites are appropriately phased and aligned with the delivery of new or improved infrastructure / sustainable transport provisions which are required to support the delivery of new housing sites. This is particularly essential for the new housing growth proposed for the edge of Blackpool and in particular at the M55 Hub strategic development sites where new physical infrastructure and improvements may be required (subject to the findings of the associated modelling work) and where new supporting sustainable transport provisions and other community facilities and services will need to be delivered to support the proposed housing growth.	This level of development is no longer being pursued by the Council in the Revised Preferred Option. The Council is no longer proposing housing development on Marton Moss/M55 Hub. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
0046	Wyre Borough Council		Consideration needs to be given to the phasing mechanism and how this relates to previously developed land indicative targets as identified in Table 7.1 of the adopted Regional Spatial Strategy. This is a joint indicative target of 65% between Blackpool, Fylde and Wyre, which should	As stated in the Preferred Option, it was recognised the 65% brownfield target was for the Fylde Sub-Region (Blackpool, Fylde and Wyre) as a whole. At the Examination in Public and following earlier representations on the Regional Spatial Strategy the figure of 65% was eventually determined having

Resp No	Name/Company	Address	Comment	Council Response
			<p>also be referenced as an indicator in section 8 (Delivery and Implementation Plan) of the Core Strategy.</p>	<p>regard to Blackpool’s circumstances of its limited choice of sites and constrained boundary. It was understood the percentage of brownfield development within Blackpool itself would potentially be below this level, counter-balanced by higher levels elsewhere in the Sub-Region.</p> <p>Notwithstanding the impending revocation of the RSS, Regeneration of inner Blackpool is a key priority for the Council as set out in Revised Preferred Option Policy CS1: Strategic Location for Development. Of the revised housing provision of 4500 new dwellings in Policy CS2, around 76 % is focused on brownfield including the Devonshire Road hospital site and other inner area regeneration sites.</p> <p>Properly planned greenfield development remains a key element towards meeting national housing needs, with development at Whyndyke within Blackpool sought to be developed as a sustainable urban extension to the existing urban area.</p> <p>The Government’s subsequent proposed revocation of RSS targets and the fact that development is no longer proposed for Marton Moss now also means that the level of proposed development on brownfield sites is expected to comply with the earlier RSS target – irrespective of its proposed revocation.</p>
0057	Government Office North West		<p>Regarding the 'phased potential' boxes on page 33, GONW would like to see an explanation of how the Council proposes to adhere to these</p>	<p>The main housing focus is on regeneration and sites within the existing urban area. Housing numbers have been reviewed and a substantial reduction made to</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>figures in order to maintain the dual focus of “regeneration and growth,</p> <p>What action will be taken if resort regeneration sites do not come forward as envisaged here, but Marton Moss sites do?</p> <p>Suggest it would be useful if more information were included in Policy S4 to explain how the dual focus aim will actually be implemented.</p> <p>A housing trajectory should be included in the Core Strategy.</p>	<p>proposed housing in Blackpool following the proposed end of regional housing targets and to reflect the realities of the housing market.</p> <p>The focus in the Revised Preferred Option is on seeking to ensure a complementary mix and financial support between the range housing on the Moss House Road and Whyndyke sites and regeneration sites, which represent different dimensions of Blackpool’s need for new housing. The redirection of developer contributions and New Homes Bonus will support inner area development.</p> <p>Core Strategy policy represents a realistic way forward to support an appropriate mix of housing to meet Blackpool’s needs.</p> <p>A housing trajectory will be included in the Core Strategy Pre Submission version based upon the housing monitoring update to be undertaken in 2012.</p>
0060	Mr M Evans Fylde Borough Council		On page 33 queries why the three phasing boxes total to 8,600 over the period 2011 - 2026 when the requirement expressed in the trajectory above is 8,000 dwellings over the same period.	The difference in these figures relates to the total ‘requirement’ (in line with RSS) as against the projected delivery of the Policy S3 sites (which included some flexibility over and above these figures). These figures have now all be revised in the Revised Preferred Option in line with the Government’s proposed revocation of RSS.
Policy S5: Employment Development and Economic Diversification				
0010	Mr Alan Marshall	Foxes Farm Flat 7 Fairfield Road	Suggests there is a need to include specific ideas to re-balance and grow the local economy sustainably.	Comments noted. Policy CS3 ‘Economic Development and Employment’ of the Revised Preferred Option supports sustainable economic development to grow

Resp No	Name/Company	Address	Comment	Council Response
		Poulton-le-Fylde	<p>Puts forward idea to expand food products, processing and distribution industry.</p> <p>Suggests Council needs to develop mechanisms to attract existing companies and encourage start-up businesses through imaginative land development/lease schemes and low business rates.</p>	<p>the local economy and support a more balanced employment market. Supporting text identifies opportunities for securing inward investment through partnership working. Any further detail, in terms of identifying which economic sectors Blackpool should target for expansion, which could include food processing, and mechanisms for actively encouraging inward investment are more appropriate to be covered by an Economic Strategy / Action Plan.</p>
0011	Blackpool Airport Ltd	Squires Gate Lane Blackpool	<p>States that the Airport is fundamentally important as a key driver of the local and sub regional economy and should be given greater acknowledgement in the Core Strategy.</p> <p>Text should be amended to refer specifically to the fundamental importance of the Airport on the economy rather than 'another' driver of the economy.</p> <p>The policy should specifically refer to the merits and opportunities which development at the Airport will bring to the economy.</p>	<p>Blackpool Airport is recognised in the supporting text as a key driver in supporting the sub-regional economy; and that employment growth opportunities on lands around the airport will be critical in capitalising on this asset. Reference to future growth and development of the Airport is made in the supporting text to Policy CS23 'South Blackpool Employment Growth' and the Council is working with the Airport, Fylde Borough Council and other stakeholders to identify appropriate opportunities.</p>
0026	Highways Agency	City Tower Piccadilly Plaza	<p>Generally supportive of the approach to focus new employment development towards the town centre, whilst safeguarding and enhancing existing employment sites.</p> <p>Raises some concerns, particularly with regards to expanding employment opportunities at the M55 Hub. The Agency appreciates the sustainability benefits of co-locating housing and employment</p>	<p>Comment noted.</p> <p>The level of development now proposed at South Blackpool is reduced; and does not include any housing allocation on remaining lands at the Moss. The Revised Preferred Option will be subject to a</p>

Resp No	Name/Company	Address	Comment	Council Response
			development, particularly with regards to reducing the need to travel, given the scale of development proposed and its proximity to the SRN, the cumulative impact of the proposals at the M55 Hub could potentially be detrimental to the operation and safety on the network. As referred to in response to Policy S3, the traffic modelling work currently being undertaken is likely to provide further evidence regarding the specific impact of the proposed developments and the Agency will be able to provide further detailed comment as and when it or its findings are made available for review.	Sustainability Appraisal (SA) which will assess the potential individual and cumulative impacts of the level of development now proposed. Notwithstanding the above, specific work was undertaken to test the impact of various levels of development in South Blackpool in conjunction with the Highways Agency and Lancashire County Council.
0033	National Grid		Support this policy as it promotes the M55 hub as a main focus for securing new employment generation development of previously undeveloped land.	Comment noted. Whilst the level of development now proposed at South Blackpool is reduced; lands at Junction 4 of the M55 will continue to be identified as a focus for sub-regional growth through the Duty to Co-operate.
0037	Muse Developments Ltd		Agree with focusing development at Talbot Gateway as a means of strengthening the Town Centre and also assisting to meet the wider objectives of delivering the employment development needs of Blackpool. Support the statement that the Talbot Gateway forms a 'critical component' of Town Centre regeneration.	Comments noted.
0052	North and Western Lancashire Chamber of Commerce	1-2 Lockheed Court Amy Johnson Way	Reference to potential for growth in the civil service and public sectors may need to be revised in light of the current financial spending constraints.	The supporting text has been revised to reflect this – but while funding cuts may adversely impact on current opportunities, there remains potential for longer term growth, including possible further

Resp No	Name/Company	Address	Comment	Council Response
0054	Ms Vicki Gale	Blackpool 22 Alexandra Road Blackpool	There needs to be a skills and jobs strategy to accompany the Core Strategy. There will be a need for diverse smaller, good quality residential units to make Blackpool vibrant and prosperous. There is a need to attract the volume of public/Government or private sector investment. New homes need to be appealing to a higher skills and professional market - such as has fuelled regeneration in Manchester. Without it there is a risk the properties the Council may acquire could become poor-quality HMOs.	Government office relocation. The Revised Preferred Option refers to a Local Economy Action Plan being developed which will identify priorities to grow the local economy and improve employment prospects for Blackpool's residents. A future Economic Strategy for Blackpool or the Fylde Coast (currently in draft format) would also cover these issues. The Core Strategy emphasis on housing regeneration proposals is focused on improving the inner area housing offer, uplifting quality, and conversely seeking to reduce the numbers of poor quality multi-rented properties.
0057	Government Office North West	City Tower Piccadilly Plaza Manchester	The evidence base will need to provide full justification for the requirement for 70 hectares of new employment land to 2026. Note that around 50 ha of the combined requirement figure is to meet joint needs around the M55 Hub on the edge of Blackpool on lands in Fylde. Asks where the supply is for the remaining 20 ha is envisaged.	The Revised Preferred Option no longer proposes a combined requirement of future employment land for Blackpool and lands on the urban edge within Fylde; it proposes a revised figure to meet Blackpool's needs and this is justified in the supporting text and separate Employment Technical Paper produced in May 2012. Due to Blackpool's geographical constraints and shortage of development land, the Policy focuses on strengthening existing assets, including Blackpool town centre and existing employment locations; and recognises the important role of lands on the edge of Blackpool in Fylde (identified as a sustainable location for sub-regional economic growth) as contributing towards meeting future longer term needs. This reliance on lands outside the Borough Boundary is dependent on the co-operation with neighbouring Fylde through the Duty to Co-operate.

Resp No	Name/Company	Address	Comment	Council Response
				A Fylde Coast Sub-Regional Employment Land Statement has been revised and updated for the three authorities of Blackpool Fylde and Wyre.
0058	Northwest Regional Development Agency	Renaissance House Centre Park Warrington	Supporting text to this policy refers to the combined requirement of 70 hectares of employment in Blackpool and Fylde however the policy itself does not quantify the scale of provision within Blackpool.	The Revised Preferred Option no longer proposes a combined requirement of future employment land for Blackpool and lands on the urban edge within Fylde; it proposes a revised figure to meet Blackpool's needs and this is justified in the supporting text and separate Employment Technical Paper produced in May 2012.
0060	Mr M Evans Fylde Borough Council		<p>The lowercase text to Policy S5 includes reference to 'a combined Blackpool/Fylde requirement of 70 ha of new employment land of which around 50 hectares are required to meet needs around the M55 Hub on the edge of Blackpool on lands in Fylde'.</p> <p>These figures are not agreed as set out in correspondence previously. The Fylde Coast MAA includes an aspiration to work towards joint employment provision at the M55 Hub, but this has not been agreed through the LDF process, nor established that Fylde Borough Council will meet its own employment land needs in this location. It is not the role of Blackpool's Core Strategy to plan for lands in Fylde.</p>	<p>It is fully recognised that allocations within Fylde will be determined by Fylde Council; and that Blackpool's Core Strategy will need to align with the policy framework of neighbouring authorities and the Council will co-operate with them on strategic planning issues as required by the Duty to Co-operate.</p> <p>The Revised Preferred Option no longer proposes a combined requirement of future employment land for Blackpool and lands on the urban edge within Fylde; it proposes a revised figure to meet Blackpool's needs and this is justified in the supporting text and separate Employment Technical Paper produced in May 2012. Due to Blackpool's geographical constraints and shortage of development land, as well as focusing on strengthening existing assets, including Blackpool town centre and existing employment locations, the Policy recognises the important role of lands on the edge of Blackpool in Fylde (identified as a sustainable location for sub-regional economic growth) as contributing towards meeting future longer term needs. This reliance on lands outside the Borough</p>

Resp No	Name/Company	Address	Comment	Council Response
				boundary is dependent on the co-operation with Fylde Borough Council through the Duty to Co-operate.
Policy S6: Quality of Place				
0013	Blackpool LSP Environment Sub Group	Lutra House Dodd Way Walton Summit Preston	Support Policy S6. Open space provide opportunities for wildlife and to reduce habitat fragmentation. Recognition of the intense urban nature and lack of countryside emphasis. Need to protect/ and enhance Blackpool's ecology / habitat.	Comment noted. This is now incorporated in policy CS6 of the Revised Preferred Option 'Green Infrastructure'.
0013	Blackpool LSP Environment Sub Group	Lutra House Dodd Way Walton Summit Preston	Concerned with the term 'as far as practicable' within the statement on landscape and biodiversity in Policy S6. Feel that this is too vague and does not commit to the conservation of biodiversity. Also raises concerns that the desk top survey work already undertaken is insufficient to identify what needs to be done to protect and enhance the biodiversity on the Moss.	Comment noted. This is now incorporated in policy CS6 'Green Infrastructure'. This level of development is no longer being pursued by the Council with the emphasis now being on supporting the retention and enhancement of Marton Moss.
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	Support this policy which aims to improve the quality of Blackpool's environment for residents and visitors. However, the reference to the need for design and access statements in the second paragraph is not necessary as these are a statutory requirement.	Comment noted. Reference to design/ access statement will be amended accordingly.
0017	English Heritage	Suites 3.3 and 3.4 Canada House 3 Chepstow Street Manchester	Support the preparation of Character Area Appraisals with reference made to Blackpool's historic Townscape Characterisation.	Support noted. The Revised Preferred Option will promote the conservation and improvement of Blackpool's Built Heritage through Policy CS8.
0020	Lancashire County	County Hall	The main area of growth at the M55 Hub is	Comment noted. This level of development is no

Resp No	Name/Company	Address	Comment	Council Response
	Council	PO Box 100 Preston	promoted on the basis that it will provide green infrastructure through the provision of SUDS and other open spaces.	longer being pursued by the Council with the emphasis now being on supporting the retention and enhancement of Marton Moss.
0023	Environment Agency	Lutra House PO Box 519 Preston	Are uncomfortable with the term 'as far as practicable' within the statement 'ensuring new developments as far as practicable retain and provide appropriate new landscape and biodiversity benefits'. Would like the policy to be rephrased to state 'Ensuring new developments retain and provide appropriate new landscape and biodiversity benefits.'	Point accepted and statement will be amended in line with comment.
0034	Head of Heritage		Supports the policy particularly where it acknowledges that heritage contributes to 'quality of place' Suggest reference could be made stating : 'Protecting, conserving and enhancing the heritage in line with World Heritage principles'	Comment noted. The Revised Preferred Option will promote the conservation and improvement of Blackpool's Built Heritage through Policy CS8.
0038	Natural England	Hornbeam House Electra Way Crewe Business Park Crewe	Fully support this policy. Welcome references to high standards of design, enhancing the local distinctiveness, retaining and enhancing biodiversity in new development, sustaining and enhancing biodiversity, safeguarding Blackpool's identity and preventing merger with neighbouring settlements and safeguarding, improving and creating an enhanced network of GI. Does the Council have a strategy for development of GI that can feed into the Core Strategy and be more explicit? Can specific sites be identified for conservation, enhancement or inclusion in the GI network? Again a link to the later GI policy would be helpful here.	Comment noted. The Revised Preferred Option will promote biodiversity and Green Infrastructure through Policy CS6. The saved policies of the Blackpool Local Plan and the LDF Proposals Map form part more explicitly identify specific conservation sites.

Resp No	Name/Company	Address	Comment	Council Response
			<p>Comment that geodiversity has been omitted from the Core Strategy. Consider that the Core Strategy would not meet soundness tests.</p> <p>Indicators identified for this policy include the number of listed buildings, conservation areas and characterisation studies. The number on its own does not represent the quality or condition of such areas and we would welcome further development of indicators to include a condition assessment.</p>	<p>This has been incorporated into policy CS6 'Green Infrastructure'.</p> <p>Comment noted. The indicators have been reviewed in the Revised Preferred Option.</p>
0047	Lancashire Wildlife Trust	The Barn Berkeley Drive Preston	Query the use of the Indicator 'Changing biodiversity of safeguarded conservation sites' as it is extremely ambiguous in its current wording. We assume that the indicator means improved biodiversity but changing biodiversity could mean a decline, so we would suggest that the wording be amended to reflect the Council's true intent.	Comment noted. This indicator has been amended to reflect the AMR Core Indicator.
Policy S7: Climate Change and Sustainable Development				
0010	Alan Marshall	Foxes Farm Flat 7 Fairfield Road Poulton-le-Fylde	Supports the use of sustainable energy generation in particular CHP. Suggests the Delivery and Implementation Plan needs to be developed in this area to include more specific ideas.	Comments noted. The Delivery and Implementation Plan has been updated in the Revised Preferred Option. It highlights the indicators that the Council will monitor to support this policy (now CS9 – Energy Efficiency and Climate Change).
0013	Blackpool LSP Environment Sub Group	Lutra House Dodd Way Walton Summit Preston	Extremely supportive of this policy.	Comment noted.
0020	Lancashire County	County Hall	The requirement in the supporting text for	Comment noted.

Resp No	Name/Company	Address	Comment	Council Response
	Council	PO Box 100 Preston	<p>recycling facilities to be incorporated into new developments and the uptake of wider waste minimisation measures is supported.</p> <p>There may be benefit in referring applicants to the Lancashire Minerals and Waste Development Frameworks supplementary planning document on Minimising and Managing our Waste in New Developments. Given this, community recycling facilities could be explicitly mentioned in Policy P01 Planning Obligations</p>	<p>Reference is now made in policy CS9 'Energy Efficiency and Climate Change' of the Revised Preferred Option.</p> <p>Community recycling facilities have been added to Policy CS10 'Planning Obligations' of the Revised Preferred Option.</p>
0023	Environment Agency	Lutra House PO Box 519 Preston	Supportive of this policy	Comment noted.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	<p>Generally supportive of this policy, but suggests that consideration should be given to the environmental implications of transport and in particular that associated with traffic congestion. The Agency considers that the sustainable location of development and effective traffic management can help to reduce the need to travel, particularly by private car, which would not only help to reduce congestion but also the resultant carbon emissions as a consequence.</p>	<p>Comment noted.</p> <p>Policies CS5 'Connectivity' and CS11 'Sustainable Neighbourhoods' of the Revised Preferred Option support this principle.</p> <p>The choice of development locations within Blackpool is limited, both in terms of redevelopment opportunities, available land, and its tightly constrained boundary. The Core Strategy focus is on inner area regeneration, where opportunities to reduce the need to travel are maximised.</p>
0038	Natural England	Hornbeam House Electra Way Crewe Business Park Crewe	<p>Would welcome a stronger policy that:</p> <p>Promote low carbon technologies alongside renewables;</p> <p>Develops a criteria based policy in line with PPS22,</p>	<p>The policy has been significantly re-drafted in the Revised Preferred Option and is now policy CS9 'Energy Efficiency and Climate Change'. It refers to the incorporation of energy efficiency measures and decentralised and renewable or low-carbon energy</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>and consider identifying suitable areas for renewable and low-carbon energy sources, and supporting infrastructure; Plan for a proportion of the energy supply of new development to be secured from A target would also be useful here to provide a means of monitoring progress.</p> <p>Suggests the policy could be expanded to include sustainable building practices and clear guidance of the Council's requirements in respect of new developments towards meeting clear targets, such as the Code for Sustainable Homes.</p> <p>Would welcome Sustainable Drainage matters being explicitly included in the policy wording rather than just in the supporting text.</p> <p>Would also welcome links here to sustainable living, GI and links to active and healthy lifestyles through walking, cycling, sustainable transport, etc.</p>	<p>sources.</p> <p>In line with the recommendations of the AECOM Climate Change and Renewable Energy Study, further clarification will be provided in relation to the 15% reduction in CO₂ emissions, with specific reference made to energy efficiency measures, and the incorporation of on-site low carbon and renewable technologies and directly connected heat. Policy CS9 of the Revised Preferred Option identifies the requirements for developments to relevant Code for Sustainable Homes. Reference is also made to the promotion of secondary and recycled materials in new developments.</p> <p>Now included in policy CS9 of the Revised Preferred Option.</p> <p>The focus of the climate change policy is on sustainable resource management and is complemented by Policy CS5 'Connectivity' which promotes sustainable transport and development, and by wider policies on Green Infrastructure and sustainable neighbourhoods in the Revised Preferred Option.</p>
0057	Government Office North West	City Tower Piccadilly Plaza Manchester	Note that Policy S7 states that the Council will ensure that development proposals incorporate renewable energy sources in appropriate new developments. Recommend that consideration needs to be made to the feasibility of setting out,	Comments noted and in line with the recommendations of the AECOM Climate Change and Renewable Energy Study, clarification has been provided in policy CS9 in relation to the 15% reduction in CO ₂ emissions, with specific reference made to

Resp No	Name/Company	Address	Comment	Council Response
			in the Core Strategy, a target percentage in line with the provisions of PPS1.	energy efficiency measures, and the incorporation of on-site low carbon and renewable technologies and directly connected heat.
Policy S8 - Connectivity				
0008	Ms Angelia Hinds	21 Moss House Road Blackpool	Asks where funding will be provided for improvements to rail links and local bus services identified in the Core Strategy.	The various schemes that were set out in Policy S8 are key strategic improvements to the sub-regional transport network which will be supported and pursued by Blackpool Council. The Government has announced plans for rail improvements. Funding for other schemes will be dependent on the success of grant bids and future central Government funding decisions. Funding of local level improvements to bus, cycle and pedestrian networks will in part be funded by future major development proposals.
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	<p>Support all of the schemes listed within this policy; however object to the policy as currently worded.</p> <p>The following schemes should be promoted within the Core Strategy:</p> <p>'No loss of car parking in the Yeadon Way/Central Corridor or in the car parks in the vicinity of Blackpool Pleasure Beach, and the implementation of environmental improvements in and around these car parks'</p> <p>Improvement of links between Yeadon Way/Seasiders Way and Blackpool Pleasure Beach, either through the use of the railway alignment between Blackpool South and</p>	<p>Comments noted.</p> <p>The schemes set out in Policy S8 related to key strategic improvements to sub-regional transport infrastructure. Specific reference to enhancement focused on the town centre and resort core was made in the supporting text to Policy S8 and in Policy R4. These have now been rewritten for the Revised Preferred Option and comprise policy CS5 'Connectivity', CS21 'Arrival and Movement and CS22 'Key Resort Gateways'.</p> <p>Reference is made to providing high quality and conveniently located car parking provision in Policy CS21 of the Revised Preferred Option Consistent with wider enhancement and improvements, a policy setting out no loss of parking along the Corridor</p>

Resp No	Name/Company	Address	Comment	Council Response
			Blackpool Pleasure Beach stations or by the improvement of the main pedestrian routes between the main car parks and Pleasure Beach'	<p>cannot realistically be committed in the Core Strategy. Changes in parking provision need to be considered as part of an overall parking strategy to accommodate visitor and resident needs related to all forms of travel, which is to be prepared by the Council.</p> <p>The fourth bullet of the supporting text on "Quality of Arrival" in Policy R4 generally addressed this issue.</p> <p>The Revised Preferred Option has been amended with the Central Corridor also identified as a key strategic gateway to Blackpool within the amended "Key Resort Gateways" with improved links within and across the area. Improved connectivity between the Central Corridor, the seafront, Blackpool Pleasure Beach and adjoining areas is also promoted.</p>
0015	Bourne Leisure		Whilst Bourne Leisure recognises the overall objective of improving Blackpool's connectivity and reducing car travel, it should be recognised that there is often no feasible alternative to the private car for reaching tourist-related developments including holiday parks in more remote and/or rural areas. The approach taken in policy R4 is therefore preferred.	Comment noted. As recognised in Policy R4, maximising both visitor numbers and the ease and quality of their arrival and movement is essential for Blackpool.
0020	Lancashire County Council	County Hall PO Box 100 Preston	<p>Welcomes the references to the upgrading of the rail gateways and improvements to the north and south gateways.</p> <p>Reference should be made to the M55 Hub and how connectivity will be addressed by means other than car.</p>	<p>Comment noted.</p> <p>The reduced housing numbers in Blackpool, and uncertainty about the future development of wider lands in Fylde do not support specific reference in</p>

Resp No	Name/Company	Address	Comment	Council Response
			Consideration should therefore be given to future development of Blackpool Airport within this policy.	<p>Policy S8. Policy M7, which specifically relates to the M55 Hub, sets out the need to develop a comprehensive public transport improvement strategy, and to optimise pedestrian and cycle connectivity between homes, jobs, and supporting community facilities.</p> <p>Blackpool Airport itself is outside of the Blackpool boundary, and its future development is a matter for Fylde Borough Council as Local Planning Authority. Reference to the future development of the Blackpool Airport Corridor is considered in the context of the revised South Blackpool focus of the Core Strategy.</p>
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	<p>Generally supportive of the proposed schemes, particularly with regards to the key strategic sustainable transport improvements, such as to the main rail and tram gateways and lines.</p> <p>However, the Agency notes that there are no bus related improvements identified. The supporting text states that there needs to be a strong emphasis placed on increasing use of the bus and also promotes the provision of a high quality bus network. However, this does not appear to be reflected in the policy. This gap should be addressed as the provision of sustainability to many of the proposed developments / areas of development are likely to be best served by extended, enhanced or new bus services.</p> <p>Welcomes in the supporting text the need for the</p>	<p>Support noted.</p> <p>A further bullet will be added which fully reflects the emphasis required to high quality bus network improvements.</p> <p>Support noted.</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>integration of development and transport in order to support economic growth and reduce the need to travel by car and welcomes the promotion of delivering a modal shift from car borne visitors to the use of public transport such as coach and rail.</p> <p>In relation to the stated improvements at the A585(T), the Agency considers that further clarification should be provided as to the detail of the scheme. The Agency presumes that this relates to those improvements being delivered through the Thornton AAP DPD of the Wyre LDF, however if this is not the case, further details for the scheme should be provided to the Agency.</p>	Comment noted.
0033	National Grid		Supports this policy and the need to improve north-south links to and from the M55. Supports measures to enhance sustainable transport patterns and improvement to connectivity and which will be essential to the success of the M55 hub.	Support noted.
0037	Muse Developments Ltd		Supports this policy and believe that the Talbot Gateway scheme can assist the Council in its aim of improving and creating connectivity through the creation of a new transport interchange and alteration at Blackpool North station.	Support noted.
0038	Natural England	Hornbeam House Electra Way Crewe Business Park Crewe	Welcomes this policy; however it makes no mention of bus and coach transport. Again, if the Council has evidence to plan for particular routes they should be included in the Core Strategy.	Point accepted. A further bullet will be added which fully reflects the emphasis required to high quality bus network improvements.
0044	Sustrans	St Pauls Centre	In favour of the public transport improvements	Support noted.

Resp No	Name/Company	Address	Comment	Council Response
		Hightown Crewe	for rail, and the tramway and connecting the two modes of transport. Would also like to see the Council continuing with its Cycle Town Demonstration work.	
0058	North West Regional Development Agency	Renaissance House Centre Park Warrington	The supporting text to this policy and the delivery and implementation plan provides little information as to how the transport schemes identified in the policy are going to be delivered. Further clarification required.	Point noted and the Infrastructure and Delivery Plan will provide further information.
0060	Mr Mark Evans Fylde Borough Council	Town Hall Lytham St Annes	<p>Page 42, Policy S8 refers to the tramway extension in its 5th bullet point. The associated lowercase text does not however provide sufficient explanation as to what this is likely to entail, nor does it demonstrate the strong spatial linkages with Fylde. If this is the SINTROPHER project which is being referred to then further explanation is needed. The same can be said for the 6th bullet point of Policy S8, which refers to the 'Blue Route'.</p> <p>Page 43, para 4, refers to poor rail access to Fleetwood. Whilst this is true as it is non existent, was this statement intended?</p>	<p>Further clarification will be provided within the supporting text to Policy S8 and in the Infrastructure and Delivery Plan being prepared in conjunction with the Core Strategy.</p> <p>Reference is relevant given the longer term potential for the re-opening of the rail link to Fleetwood.</p>
General Comments				
0058	North West Regional Development Agency	Renaissance House Centre Park Warrington	Suggest consideration is given to moving policy R1 to Chapter 4 and substituting R1 in place of S2 as there appears to be some overlap.	The Revised Preferred Option is Resort Renaissance and City have now been removed but the content of the policies is now contained in

Chapter 5: Town Centre and Resort Renaissance

Resp No	Name/Company	Address	Comment	Council Response
The Vision				
0034	Head of Heritage		<p>Supportive of the vision and reference made to major heritage assets, The historic significance of the Promenade should be identified as the main artery of the resort.</p> <p>Mention should be made to the first phase improvement planned for the Winter Gardens and Tower.</p>	<p>Comment noted. Whilst the Vision for the Town Centre has now been incorporated into the overarching Core Strategy Spatial Vision, reference to heritage assets including the Promenade, Tower and Winter Gardens remains.</p> <p>This is referred to in the Heritage Policy (re-numbered CS8 in the Revised Preferred Option), the Winter Gardens Policy (CS17) and will also be included in the supporting Infrastructure and Delivery Plan.</p>
Policy R1: Resort Renaissance				
0012	Blackpool Holiday Trades Association	Queen Victoria Hotel 60 Station Road Blackpool	Supports the inner regeneration strategy and the need to reinvigorate the adjoining holiday and residential neighbourhoods. Pleased that the major new development projects at the Tower and Winter Gardens will be implemented through the Core Strategy.	Comment noted.
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	<p>We strongly support the inclusion of this policy. However, to be effective, we would suggest the following amendments:</p> <p>Reference to Blackpool's resort and town centre core to be clarified. This is similar to a number of other designations used,</p>	<p>Comment noted.</p> <p>Clearer and consistent reference to the Town Centre and Resort Core will be set out in the Key Diagram and in the Revised Preferred Option.</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>but again differs and is not referred to in the Key Diagram. The Pleasure Beach should fall within this area.</p> <p>The second bullet point refers to identifying and promoting opportunities for major new attractions and visitor accommodation focussed on the town centre and core of the resort. Again, this designation should be clarified, ideally with reference to the Key Diagram, and the Pleasure Beach should fall within this area.</p> <p>The supporting paragraphs refer to the 'resort core' and 'inner areas', which are undefined.</p> <p>The Pleasure Beach does, however, support the focussing of investment and development in the resort core, where the Pleasure Beach is included within this area.</p>	<p>The town centre, resort core and inner area regeneration focus, as shown on the Key Diagram, does include the Pleasure Beach, and will be amended to reflect this.</p>
0015	Bourne Leisure Ltd		<p>State that Policy R1 should not apply only to the resort and town centre core but also to the wider resort area. It is particularly important in this regard that holiday parks such as Marton Mere that are situated outside of these narrowly defined areas have a positively worded policy context within which to promote</p>	<p>The focus of Policy R1 and Section 5 is on the town centre and resort core strategic focus for change and development, but the value of supporting tourist facilities elsewhere is fully recognised which complement attractions and accommodation in the resort core.</p> <p>Policy CS20 – Leisure and Business Tourism of the Revised Preferred Option recognises and reflect</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>their enhancement and where appropriate, their expansion.</p> <p>Identify the need for a new policy in the Core Strategy which applies to existing holiday parks and which would both help to address the identified need for investment and reflect the positive economic benefits of reinvestment.</p>	<p>the importance of other sites outside the resort core, and include specific reference to the Marton Mere Caravan Park.</p> <p>Policy CS20 – Leisure and Business Tourism identifies and embraces a wide ranging focus to support the future regeneration and development of the resort. It is not considered there is any requirement for a separate policy for holiday parks.</p>
0021	Ms Anne Frith	Runnell Cottage Chapel Road Blackpool	Encouraged to see improvements to the Town Centre. Would like to see improvements to the traditional character properties.	Comment noted.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	Generally supportive of the approach proposed to regenerate the resort and town centre core, particularly as a location to support major development opportunities, given its general sustainability credentials, existing infrastructure and sustainable transport provisions and the provisions of Policy R4: Arrival and Movement.	Comment noted.
0034	Head of Heritage	Blackpool Council	Supports this policy. Pleased to see reference is made to heritage and its role in maintaining the towns distinctive character.	Comment noted.
0050	The Noble Organisation	1a Dukesway Court Team Valley Trading Estate Gateshead	Supports the safeguarding and enhancement of long standing attractions and building on the resorts heritage however, suggests specific	Comment noted. Policy R1 provided the overarching Core Strategy policy for the renaissance of the resort. No mention is made of the Tower, Piers or other specific attractions in this

Resp No	Name/Company	Address	Comment	Council Response
			mention should be made to those facilities that define these features such as Coral Island.	policy, and it is inappropriate and unnecessary to do so.
0058	North West Regional Development Agency	Renaissance House Centre Park Warrington	Suggests that R1 provides a more appropriate strategic policy framework for the resort and town centre than Policy S2 Delivery partner should not be identified as the NWDA.	These sections have been redrafted and restructured in the Revised Preferred Option. Reference to NWDA as a “delivery partner” will be deleted.
Policy R2: Conference, Events and Festivals				
0015	Bourne Leisure Ltd		Supportive of this policy.	Comment noted.
0028	The Theatres Trust	22 Charing Cross Road London	Supports the content of this policy with no further comments.	Comment noted.
0034	Head of Heritage	Blackpool Council	Supports the policy, however would like to see specific reference to the Winter Gardens’ historical significance.	Support noted. Specific reference to the important need to capitalise on the historic legacy of the Winter Gardens is included Policy CS17 ‘Winter Gardens’ and Policy CS8 ‘Heritage’.
0042	Mr Christian Cox	6 Ravenwood Avenue Blackpool	Although agrees that there is a place for conference trade Blackpool, it should be ancillary rather than the centrepiece. Supportive of new events and festivals.	Support noted. Policy CS20 ‘Leisure and Business Tourism’ sets out Blackpool’s continued involvement in conferencing which remains an important part (but not a centrepiece) of the resort’s appeal. The Winter Gardens and supporting hotel based conference facilities provide a distinctive Blackpool offer.
Policy R3: Resort Heritage				
0025	Mr John Ashworth	Runnell Cottage Chapel Road Blackpool	With good guidelines in place Blackpool should be able to accommodate groups of young people (such as on stag and hen weekends) and families side by side. Prefers traditional seaside fun in the	Comment noted.

Resp No	Name/Company	Address	Comment	Council Response
0034	Head of Heritage		<p>future of Blackpool than Casinos.</p> <p>Supports this policy but would like to see reference to Blackpool's current World Heritage Status bid reflecting the Council's commitment.</p> <p>Also like reference to completion of characterisation studies for whole borough.</p>	<p>Comment noted. The Core Strategy is fully supportive of exploiting the principles of Blackpool's mass appeal as the world's first seaside resort but the Council's unsuccessful bid is not relevantly specifically referred to in the Core Strategy.</p>
0050	The Noble Organisation	1a Dukesway Court Team Valley Trading Estate Gateshead	<p>The first bullet point should be amended to recognise the important role of existing major attraction such as Coral Island.</p>	<p>The Resort Heritage policy focuses on the older and iconic listed buildings and predominantly Victorian origins of many of the resort's entertainment facilities. It makes no specific reference within the policy to particular attractions, and it would not be relevant to include specific reference to Coral Island in this policy.</p>
Policy R4: Arrival and Movement				
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	<p>Support this policy, subject to amendments.</p> <p>The reference to 'providing sufficient, high quality parking to support the retail and wider economy' should be amended to state: 'providing sufficient, high quality and conveniently located parking to support retail, major visitor attractions and the wider economy, with no loss of spaces where parking serves the main resort core'.</p>	<p>Third bullet of policy will be amended in line with comment. The general focus of Core Strategy policy is to provide sufficient high quality parking, and it is not realistic or appropriate to include a specific statement that there will be "no loss of spaces where parking serves the main resort core"</p> <p>The supporting text to the policy sets out that the Council will promote strategic parking within the town centre and central corridor, and 'increased parking at Blackpool Pleasure Beach', and these</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>The supporting text on Quality of Arrival does not fully reflect the issues faced by operators of attractions.</p> <p>Accessibility from Yeadon Way to South Beach and the Pleasure Beach needs to be identified as a significant issue with a clear commitment to address it.</p> <p>Supports the general strategy is to minimise cross town movements by locating car parks at main arrival points into the resort and town centre but direct access from Yeadon Way to car parks in the vicinity of Pleasure Beach and an improved visitor experience for pedestrians are much needed</p> <p>Unsure whether the reference to approximately 2,000 spaces at central corridor is an increase or a decrease over current capacity. Objects to any decrease</p>	<p>issues will be dealt with in more detail within the council’s proposed parking strategy. The aim is to ensure optimal provision for visitors and residents by a range of modes of travel, as part of a coordinated strategy which best addresses and eases access and movement for all.</p> <p>The fourth bullet of the supporting text on “Quality of Arrival” generally addresses this issue, but will be amended to refer to access to the town centre, promenade, Pleasure Beach, and other resort and adjoining residential areas.</p> <p>The reference to 2,000 spaces on the central corridor relates to the area to the south of the town centre/ Chapel Road and is in line with the existing level of provision.</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>to this level of parking and would ask that the existing level of parking is protected, with improved pedestrian links.</p> <p>Request part of the policy is reworded so that the council promotes: 'increased parking both at and within walking distance of Blackpool Pleasure Beach and improved links to parking in the Central Corridor'.</p>	As above, reference is specifically made to the need for increased parking and improved connectivity with the Pleasure Beach which reflect this point.
0015	Bourne Leisure Ltd		Support is given to this policy however it is necessary for some visitors to be car borne in order to access the more remote tourist attractions/facilities.	Support and point noted.
0044	Sustrans	St Pauls Centre Hightown Crewe	Supports public transport proposals and improvements for residents and visitors. Suggest that changes need to be made to Blackpool North Station to make it more attractive and easily accessible by foot or bike.	Support and point noted.
Policy R5: Blackpool Town Centre Strategy				
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	Suggests clarification of the first bullet point. This states that Blackpool town centre will be the location for 'all major retail development'. Requests rewording this to: 'it being the location for all major non-tourism retail development'. This will allow for Pleasure Beach to continue to widen its appeal and extend the periods in which it is open.	Strengthening the retail offer with new retail development is a fundamental part of the Council's strategy for Blackpool Town Centre; and this approach is consistent with the retail hierarchy (Policy CS4: Retail) which identifies the Town Centre as being the focus for major retail development (in line with national policy). This does not prevent appropriate supporting retail development elsewhere, with Policy CS4 setting

Resp No	Name/Company	Address	Comment	Council Response
				out the approach for retail provision across Blackpool.
0020	Lancashire County Council	County Hall PO Box 100 Preston	<p>In principle, the location of all major retail proposals and the development of office space within the town centre is welcomed and in line with PPS4.</p> <p>They note that the evidence on which the Town Centre Strategy is based consists of the Roger Tym and Partners: Preston Tithebarn Study which is yet to be published.</p> <p>State that consideration should be given to reduce the 20 policies or combining some of these policies or referring to future or existing DPD's.</p>	<p>Support noted.</p> <p>The revised Fylde Coast Retail Study embraces this evidence and is being published and made available with the Revised Preferred Option.</p> <p>Policies R5, R6, R9, and R11, and also Policies R12 – R16 of the Preferred Option have been combined/reduced, reflecting this point.</p>
0028	The Theatres Trust	22 Charing Cross Road London	Supports the content of this policy - no further comments.	Support noted.
0030	Sainsburys Supermarkets Ltd		Supports this policy, particularly the aspiration to strengthen the prime retail area of the town centre.	Support noted.
0035	Blackpool, Fylde & Wyre Economic Development Company		<p>The wide boundary for the area could mitigate against the commerciality of achieving the stated aspirations for Blackpool Town Centre.</p> <p>Suggest an alternative approach consolidating the area around genuine</p>	<p>It is proposed to amend the town centre boundary so that all three strategic sites (Winter Gardens, Central Business District and Leisure Quarter) are included within the town centre; to help drive economic growth and enable the sites to integrate more closely with the town centre.</p> <p>Delivering the three strategic sites will act as a catalyst for further regeneration, investment and</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>existing opportunities in the short to medium term whilst retaining the longer term aspirations. Greater clarity regarding the priority, phasing and character of development of the key sites could help address this issue.</p> <p>A robust regime for neighbourhood and streetscape management is critical to achieving the spatial aspirations for Blackpool Town Centre.</p>	<p>development within the town centre; complementing and supporting development the principal retail core and the commerciality of the town centre as a whole. The Infrastructure and Delivery Plan published for the Pre-Submission document will provides further information on the priority, phasing and character of development of these strategic sites.</p> <p>Point agreed. The supporting text to the Town Centre Policy refers to a Town Centre Strategy being developed; this will identify appropriate management measures and accountability.</p>
0037	Muse Developments Ltd		Supports the potential contribution that the redevelopment of Talbot Gateway could have on the Town Centre. Consider that the delivery of Talbot Gateway will assist in attracting increased numbers of visitors to the Town Centre and the creation of new jobs.	Support noted.
Policy R6: Prime Retail Area				
0037	Muse Developments Ltd		Support the inclusion of Talbot Gateway in the Town Centre boundary. Clarity is required for the Principal Retail Core as its boundary is not clearly defined.	Comment noted. This policy has now been incorporated into policy CS16 of the Revised Preferred Option. The boundary of the principal retail core remains as shown in the saved policy of the existing adopted Local Plan and will be shown for information on the revised Town Centre plan in the Core Strategy.
0042	Mr Christian Cox	6 Ravenwood Avenue Blackpool	Supportive of this policy. Would like to see improved retail provision, promotion of the night time economy.	Comment noted.

Resp No	Name/Company	Address	Comment	Council Response
0050	The Noble Organisation Ltd	1a Dukesway Court Team Valley Trading Estate Gateshead	Principal retail core is ill defined in figure 7 and should show the frontages it relates to.	The boundary of the principal retail core remains as shown in the saved policy of the existing adopted Local Plan and will be shown for information on the revised Town Centre plan in the Core Strategy.
Policy R7: Winter Gardens Strategic Site				
0034	Head of Heritage	Blackpool Council	Suggest reference should be made to the fact that the Winter Gardens are the most complete Victorian all weather complex in the world.	Amendment made in line with comment.
0028	The Theatres Trust	22 Charing Cross Road London	Supports the content of this policy with no further comments.	Comment noted.
0042	Mr Christian Cox	6 Ravenwood Avenue Blackpool	Supports the re-use of the Winter Gardens and would particularly like to see a mixed use retail/leisure/entertainment use similar to the Printworks in Manchester.	Comment noted, with mixed use the focus of the Winter Gardens Policy.
0050	The Noble Organisation Ltd	1a Dukesway Court Team Valley Trading Estate Gateshead	The policy refers to potential use for a casino. States that Blackpool has no right under current legislation to any casino licenses and there can be no reasonable prospect during the life of the Core Strategy and therefore the reference to casino use should be deleted.	There is no proposal for casino use. The Winter Gardens policy refers to a range of potential uses for which development may be permitted. The legislation referred to relates to regional casino developments and, whether or not this is reviewed, there remains potential for a local casino as part of a wider multi-purpose complex, which it remains relevant to include as part of a wide range of potential uses.
Policy R8: Talbot Gateway Town Centre Strategic Site				
0008	Ms Angelia Hinds	21 Moss House Road Blackpool	Asks if any alternative proposals will be put forward for Talbot Gateway if government funding is no longer available.	The substantial progress to date in assembling the site and developing the proposals for the Talbot Gateway/CBD has led to major developer interest in the site. First phase major development will

Resp No	Name/Company	Address	Comment	Council Response
				come forward to provide the foodstore, council offices and supporting development. The pace and extent of further phases will follow but their timing and precise format will be subject to review.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	The Agency is generally supportive of the redevelopment of the Talbot Gateway site to provide a mixed use strategic site capable of accommodating new major office and residential development, and supporting retail and community facilities. The Agency particularly welcomes that this development would be underpinned by an improved public transport interchange and gateway at the station, providing improved sustainable connectivity within and to outside of the Borough.	Comment noted.
0030	Sainsburys Supermarkets Ltd		Supports the aim of the Council to provide Talbot Gateway as an anchor to the development of the northern Town Centre redevelopment.	Comment noted.
0037	Muse Developments Ltd		Supports this policy, however, raises concerns with its wording. Request the re-wording of the policy from 'will include' to 'may include' to provide flexibility in the future. Suggest that figure 8 is misleading as it is only an indicative phasing plan. The phasing of the development will be	Comment noted. The balance and precise mix of uses set out to be incorporated in the development very accurately reflects the strategy for the site, but not all elements will be as readily deliverable as others. To this extent, reflecting this point, the wording has been amended. Figure 8 is stated is only an indicative phasing plan. This will be removed in the Revised Preferred Option.

Resp No	Name/Company	Address	Comment	Council Response
			considered in more detail at the reserved matters application stage.	
0042	Mr Christian Cox	6 Ravenwood Avenue	Strongly supports this policy but disappointed to see that the bus station will not be demolished as part of the scheme.	Comment noted. Scheme viability would not support redevelopment. The bus station will be subject to a major facelift to transform its current appearance and impact, so it can become an asset to rather than constraint on wider development.
Policy R9: St John's, Abingdon Street and the Lanes				
0025	Mr John Ashworth	Runnell Cottage Chapel Road Blackpool	Supportive Blackpool Town Centre's 'café culture' and would like to see this in South Shore.	Comment noted. This policy has now been removed and incorporated in the Town Centre policy in the Revised Preferred Option.
0042	Mr Christian Cox	6 Ravenwood Avenue Blackpool	Supports this policy, particularly the reuse of the Post Office.	Comment noted. This policy has now been removed and incorporated in the Town Centre policy in the Revised Preferred Option.
Policy R10: Former Central Station/Promenade Town Centre Strategic Site				
0008	Ms Angelia Hinds	21 Moss House Road Blackpool	Asks if there are any alternative proposals put forward in the event of funding becoming unavailable to relocate the courts and police station.	<p>The two elements both require major and costly relocations, and will very much depend on the successful marketing and extent of developer interest in the future provision of a major new landmark attraction on the central station site. If the funding (public and private) required to enable such relocation is not forthcoming, the alternative in terms of these uses is that they will remain in their current location.</p> <p>There are no current proposals for the central station site. Substantial publicity has been given to the potential for a major new leisure development, and the Council has signed an 'exclusivity agreement' to enable the prospective developer to undertake a detailed viability assessment of the</p>

Resp No	Name/Company	Address	Comment	Council Response
				<p>proposal.</p> <p>The Council has prepared a development brief Supplementary Planning Document (SPD) to set out further details of the Council's requirements for the future development of the site – whether in terms of the current developer interest or, alternatively, as part of a wider remarketing of the site in accordance with the requirements of Policy R10.</p> <p>Other alternative options were set out in the Core Strategy Preferred Option, but the Council's focus of any future development remains in accordance with Policy R10, now Policy CS19 of the Revised Preferred Option.</p>
0016	Brunswick Property Development Ltd	209 Church Street Blackpool	<p>Many sites fronting the Promenade already represent a vibrant family orientated leisure offer.</p> <p>The approach from the Town Centre to the football ground to central car park is in need of regeneration as a priority</p> <p>Comment that some of the buildings within this site are relatively new and their replacement is not necessary</p>	<p>The policy focus is to “provide compelling new reasons to visit Blackpool”. As such the transformation sought is one which would enhance Blackpool's appeal to visitors, and complement and support its existing attractions.</p> <p>The regeneration need for the improvement of the approach to the site is fully recognised and supported in the Arrival and Movement and Connectivity policies in the Revised Preferred Option.</p> <p>No proposal can be progressed without full consultation and discussion with all landowners, which is vital to progress further development of</p>

Resp No	Name/Company	Address	Comment	Council Response
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	without any discussion with landowners. Given the general sustainable nature of the Former Central Station site, the Agency has no particular concerns regarding its redevelopment for major new leisure attractions provided that the proposals in Policy R4 help to ensure good sustainable transport connectivity to and from the site.	the site. Comment noted.
0032	Silcock Leisure (Northwest) Ltd	Pier Forecourt Promenade Southport	States that it is important to ensure that this new comprehensive development is well integrated into other attractions in the area and does not provide a one stop destination to visitors to the detriment of other Promenade businesses. Silcocks would not wish to see any redevelopment which includes or replicates those leisure facilities which are already available within Fun Palace and the Carousel. Further, Silcocks would not want any expansion of their own business be prejudices by the Councils future proposals for the Central Station Site.	Comment noted. The whole policy focus is to “provide compelling new reasons to visit Blackpool” and “physically and functionally integrate the site” with the adjoining town centre shopping and seafront uses. As such the transformation sought is one which would enhance Blackpool’s appeal to visitors, and complement and support its existing attractions.
0035	Blackpool, Fylde and Wyre Economic Development Company		State the policy needs to take account of the ongoing work to develop a Planning Brief for this site.	The policy has been updated to reflect the now adopted Planning Brief SPD.
0042	Mr Christian Cox	6 Ravenwood Avenue	Supportive of the redevelopment of this	Comment noted.

Resp No	Name/Company	Address	Comment	Council Response
		Blackpool	site for a major tourist attraction rather than a conference centre. Does not support option R10A.	
0050	The Noble Organisation	1a Dukesway Court Team Valley Trading Estate Gateshead	<p>Supports the general aim of major leisure development subject to it:</p> <p>a) not competing with existing businesses and attractions b) physically integrating with existing leisure attractions c) maintaining good access and car parking</p> <p>First bullet of policy should be amended to '. . . Ensuring new facilities do not undermine existing' (attractions)</p> <p>Second bullet should be amended to say 'where necessary' at the end of the sentence.</p> <p>Third bullet: 'requiring full integration with Coral Island.</p>	<p>Comment noted.</p> <p>The whole focus of Policy R10 is to “provide compelling new reasons to visit Blackpool” and “physically and functionally integrate the site” with the adjoining town centre shopping and seafront uses. As such the transformation sought is one which would enhance Blackpool’s appeal to visitors, and complement and support its existing attractions.</p> <p>Policy R4 similarly sets out the essential need to provide ease of access between all key resort and town centre facilities, supported by sufficient and high quality parking and gateway arrival facilities.</p> <p>The intents of the second and third bullets are similarly part of the strategic focus of Policy R10. It is unnecessary to specifically refer to Coral Island which is an important part of the seafront and town centre, which are directly referred to in the policy.</p> <p>In these terms, it is not considered relevant to make these further qualifications to the policy.</p>
Policy R11: Town Centre Promenade Leisure Frontage				
No Comments Received.				

Resp No	Name/Company	Address	Comment	Council Response
Policy R12: Resort Neighbourhoods				
0001	Mr Rashmi Pandav Blackpool Congregation of Jehovah's Witnesses	9 Lowthorpe Crescent Preston	Suggest that 2nd bullet point should include 'associated Community Facilities'.	The focus of Policy R12 (now CS11 'Sustainable Neighbourhoods') was on creating a better balanced community in the resort neighbourhoods with higher quality holiday accommodation and a better mix of housing. The wider essential components of a better quality of life in the priority neighbourhoods is relevantly set out in Policy G1, (now CS11 of the Revised Preferred Option) includes reference to the provision of an appropriate, high quality of community facilities.
0025	Mr John Ashworth	Runnell Cottage Chapel Road Blackpool	Supports the reduction in bed spaces.	Comment noted.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	<p>Previously provided comments on consultation drafts of the Foxhall AAP and South Beach AAP.</p> <p>It was generally considered that both areas benefited from good accessibility from public transport, in particular via bus and tram and would be supportive if these linkages were to be enhanced to improve sustainable accessibility for local residents, workers and visitors.</p> <p>Based on the level of information provided in the drafts and the supporting documents, it was not possible to determine any specific impacts resulting from the proposals and whilst it is</p>	Comments noted. The Council is no longer pursuing the AAPs for North Beach, South Beach and Foxhall.

Resp No	Name/Company	Address	Comment	Council Response
			unlikely that individual proposals within the AAPs would have a significant impact on the safety or operation of SRN, it was advised that consideration should be given to the cumulative impact of the developments proposed across the resort and the AAP areas.	
Policy R13: Rigby Road Strategic Site				
0007	Mrs P Hawkins	14 Dunes Avenue Blackpool	Suggest that the Rigby Road strategic site would be suitable for a residential development with a mixture of family, social and affordable housing.	The Rigby Road site was previously put forward in the Core Strategy Preferred Option when it was proposed and fully envisaged it would be redeveloped for the relocation of the main Blackpool and Fylde College campus. In the absence of Government funding, a substantial focus for regeneration of the site will be on residential development. It is not now considered to be a 'Strategic Site'.
0016	Brunswick Property Company Ltd	209 Church Street Blackpool	The principle of regenerating this area is supported as it currently represents a poor approach to the town. The Council's efforts should be targeted in this area.	Comment noted.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	The Agency recognises that the site is generally sustainable in nature and well located in terms of good public transport accessibility and therefore utilising the site for strategic development presently should not be a concern.	Comment noted.
0035	Blackpool, Fylde and Wyre Economic Development Company		This site could be identified within the context of a wider opportunity including adjacent sites such as the former gas works and the tram depot. The core	In the absence of Government funding, which originally provided the fundamental reason for its earlier identified designation, the Rigby Road site will not specifically be defined as a strategic site

Resp No	Name/Company	Address	Comment	Council Response
			strategy will be important in promoting future mixed-use development of the site.	with detailed boundaries in the revised edition of the Core Strategy. The policy will be retained and amended to more broadly relate to the wider opportunities which exist on this site and adjoining land to promote future mixed use development of this area, in line with this comment.
0057	Government Office North West	City Tower Piccadilly Plaza Manchester	Comment that the policy does not contain sufficient information regarding the proposals for the site beyond the rather vague intention to comprehensively re-develop it. The supporting text sheds no further light on this.	The Rigby Road site was proposed as a strategic site in the Core Strategy Preferred Option when it was envisaged it would be redeveloped for the relocation of the main Blackpool and Fylde College campus. The Government's 2010 decision ended hopes of funding and the basis for this proposal, and it is accepted the subsequent late amendment provided insufficient information to justify its continued identification, and it will not be defined as a strategic site in the revised Plan.
0059	Karen Taylor	Themis Chambers Suite 14067 145-147 St Johns Street London	Raises concerns this site could be sold as a hotel development.	<p>Comment noted. No decision has been taken on the future development of the site, but the focus is expected will be on residential use as part of a wider mixed use development of the site and adjoining lands.</p> <p>There are no proposals and no need for further major new hotel development at this location, with the focus of future provision remaining on the town centre and main holiday areas closer to the seafont.</p>
Policy R14: Foxhall Resort Neighbourhood				
0024	Hay Hill Ltd	18-22 Wigmore Street London	The aspiration to comprehensively improve, redevelop and transform this 'declining resort area' to a thriving mixed	Comment noted. The Council's priorities have now changed with regards to Foxhall. The Council is no longer pursuing an AAP for the area. The

Resp No	Name/Company	Address	Comment	Council Response
			<p>use neighbourhood is welcomed. However, the Council has recently refused applications inconsistent with this statement.</p> <p>Queries the sentence referring to the Council 'seeking substantial redevelopment and a transformation of other parts of Foxhall. This is at odds with the Foxhall Preferred Option which refers to 'comprehensive improvement'.</p> <p>R14 should allow for individual conversions/developments in the current economic climate.</p>	<p>relevant policies in the Revised Preferred Option are CS11 'Sustainable Neighbourhoods' CS24 'Off Promenade Holiday Accommodation'</p> <p>Reference to substantial redevelopment related to the continuing aspiration for new housing. Current proposals are being progressed for redevelopment at Tyldesley Road, but in the absence of wider funding Policy R14 has been replaced by a more broadly based policy in the Revised Preferred Option placing emphasis on the continued need for comprehensive improvement and change across the wider neighbourhoods.</p>
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	Based on the level of information provided in the Foxhall AAP, it was not possible to determine any specific impacts resulting from the proposals and whilst it is unlikely that individual proposals within the AAP would have a significant impact on the safety or operation of SRN, it is advised that consideration should be given to the cumulative impact of the developments proposed across the borough.	Comment noted. The Council is no longer pursuing an AAP for the Foxhall area.
0034	Head of Heritage	Blackpool Council	Support this policy	Comment noted.
0040	Mr A Coldwell	6 Coop Street Blackpool	Considers this area to be an eyesore in need of regeneration. Suggests the redevelopment of the entire area with the retention of two heritage streets that	Comment noted. Major redevelopment potential is limited by market realities, and viability issues. The identification of Yorkshire Street and Birstow Street as part of the Foxhall Village Main Holiday

Resp No	Name/Company	Address	Comment	Council Response
			would be utilised as a working Victorian Museum.	Accommodation Area, (in accordance with Policy R19) provides a basis to capitalise on their Victorian heritage, whilst seeking to deliver high quality accommodation and meets the needs of today's visitor.
0041	Mr David Wilmot	225 Central Promenade Blackpool	Concerned regarding the uncertainty of plans in Foxhall and lack of funding for regeneration.	Current proposals are being progressed for redevelopment of Tyldesley Road and were approved in January 2011 by the Council, which provide clarification of the current redevelopment priority and focus of the Council. In the absence of wider funding Policy R14 has been replaced by a more broadly based policy in the Revised Preferred Option placing emphasis on the continued need for comprehensive improvement and change across the wider resort neighbourhoods.
0057	Government Office North West	City Tower Piccadilly Plaza Manchester	Clarification required to confirm whether the Neighbourhood Plans is (or will be) Development Plan Documents.	In the context of new national planning policy including the Localism Act, and constraints with funding, the future of neighbourhood planning in these areas remains a priority, but the appropriate way forward will be through supporting Supplementary Planning Documents or potentially through community led plans. Reference in policy CS11 of the Revised Preferred Option only generally refers to neighbourhood plans.
0058	North West Regional Development Agency	Renaissance House Centre Park Warrington	The area is unclear on the key diagram. A more detailed map should be provided.	Policy R14 has been replaced by a more broadly based neighbourhood policy in the Revised Preferred Option and places emphasis on continuing improvement and change across the resort and inner area neighbourhoods. With no current certainty in terms of the future preparation of a Foxhall Neighbourhood Plan, it is

Resp No	Name/Company	Address	Comment	Council Response
				inappropriate to include a more detailed Foxhall plan, but an inset plan will be included in the revised Core Strategy showing the defined wider inner area boundary and resort neighbourhoods.
Policy R15: South Beach Resort Neighbourhood				
0012	Blackpool Holiday Trades Association	Queen Victoria Hotel 60 Station Road Blackpool	<p>Comments that whilst some of the hotel accommodation in the area may be described as 'low quality', much of it is not. The quality of the accommodation is mixed and it is mixed throughout the neighbourhood. Poor quality accommodation is not concentrated in one place.</p> <p>Raise concerns about current proposals to 'de-zone' part of the neighbourhood, as this area targeting would blight some good quality accommodation.</p> <p>Suggest that reducing the amount of holiday accommodation should be implemented on the basis of one-to-one negotiations with owners, rather than changing the status of whole blocks of streets.</p> <p>Suggest s process of gradual renewal combining small scale redevelopment</p>	<p>It is accepted the quality is mixed, with a range of accredited accommodation across the resort which will continue o be supported and remain an important part of Blackpool's overall holiday accommodation offer.</p> <p>Policies R18 - R20 (these have been replaced by policies CS 23 and CH24 in the Revised Preferred Option) set out the overall focus of Core Strategy policy to enhance and improve the quality of holiday accommodation across the resort neighbourhoods. The proposals have no impact on the existing use of properties, but provide the basis for decisions on future planning applications to support a mix of holiday and housing uses.</p> <p>There is a need to reduce the amount of holiday accommodation and to promote and manage change in the holiday areas. The detailed application of these policies is set out in the Supplementary Planning Document (adopted March 2011) on Holiday Accommodation which has been subject to full public consultation in parallel with the Core Strategy and defines the boundaries of the main holiday accommodation</p>

Resp No	Name/Company	Address	Comment	Council Response
			and refurbishment could deliver a neighbourhood which has a complementary mix of good quality holiday accommodation and a diversified, higher quality housing stock.	areas. The emphasis elsewhere remains on uplifting holiday accommodation, but also provides businesses the flexibility to convert to quality residential use. Further supporting guidance approved by the Council sets out required new standards to ensure higher quality conversions.
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	<p>Support the policy.</p> <p>However, consider that the fifth bullet point should be reworded. Its current wording is:</p> <p>'Improved connectivity between the Central Corridor lands, seafront and adjoining areas'</p> <p>This should be amended as follows: 'Improved connectivity between the Central Corridor lands, seafront, Pleasure Beach and adjoining areas, and no loss of existing parking capacity'.</p> <p>Fourth paragraph of the supporting text makes reference to South Beach being a strategically located 'gateway' to the town and resort. Consider that South Beach is itself a destination for visitors travelling to Blackpool via the M55/Yeadon Way and Blackpool South and should therefore be identified as such in the supporting text.</p>	<p>Comments noted.</p> <p>Policy R14 has been replaced by a more broadly based neighbourhood policy in the Revised Preferred Option (CS11) which continues to place emphasis on the need for regeneration and change.</p> <p>Policy CS22 of the Revised Preferred Option 'Key Resort Gateways' fully recognises the importance of the central corridor and its connectivity to adjoining areas. The policy recognises and identifies the Central Corridor as a key strategic gateway to Blackpool from the M55, with reference to improved links and enhancements required.</p> <p>Reference to the important role of improved parking at the Central Corridor is made in the revised Key Resort Gateways policy. Further details of parking provision are dealt with in Policy R4.</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>It needs to be made clear that parking south of Waterloo Road supports the South Beach attractions and that development proposals must retain at least the same level of parking or enhance provision. It should also state that the Council will support proposals which improve the linkages between this parking area and Pleasure Beach. Such improvements would increase the usage of the parking areas and enable increased investment to improve its appearance.</p> <p>This policy may also be an appropriate place to make specific reference to the aspirations for the further development and enhancement of Pleasure Beach, with reference to the designation on the Key Diagram. The following wording is suggested</p> <p>“Although well established, the future development and success of Pleasure Beach will have a major direct impact on the ability of Blackpool to refresh its offer and continue to act as a mass tourism destination.</p> <p>“Development at and adjoining Pleasure Beach that would complement the main</p>	<p>Policy CS20 ‘Leisure and Business Tourism’ of the Revised Preferred Option highlights the importance of the existing tourist attractions and that the Council will support future improvement and enhancement.</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>amusement park use would create significant regeneration benefits for Blackpool as a whole, particularly as the continuing success of Pleasure Beach is central to the ongoing attractiveness and viability of Blackpool as a visitor destination. It will also help to secure the long term financial viability and sustainability of the amusement park and create significant operational benefits, as well as employment opportunities for local residents within any new facilities.</p> <p>“Complementary tourism-related development (primarily entertainment and leisure, tourism retailing and accommodation) is necessary to create a more dynamic international destination that will appeal to a wider range of visitors (i.e. across wider social classes and wider geographical area) for larger proportions of the year.”</p> <p>The Core Strategy should specifically recognise the following:</p> <ul style="list-style-type: none"> • The flexibility for BPB to enhance the range of attractions on the site to enable it to compete with other regional and national attractions (such uses to include amusement park rides 	

Resp No	Name/Company	Address	Comment	Council Response
			<p>and attractions, entertainment, retail, hotel, casino, food and drink); and</p> <ul style="list-style-type: none"> A transport strategy that promotes improved linkages between Pleasure Beach and the central car parking corridor and facilitates an increase in off-site car parking in the vicinity of Pleasure Beach and other South Beach attractions. 	
0012	Blackpool Holiday Trades Association	Queen Victoria Hotel 60 Station Road Blackpool	Concerned that the development of the South Shore District Centre is too focussed on Waterloo Road and Lytham Road. The statement should be changed to read 'Waterloo Road, Lytham Road and Bond Street', to reflect the definition of the centre in the 2009 Issues and Options Report of the evolving Neighbourhood Plan. Fully support the proposal to enhance the District Centre as the commercial heart of the area.	Comment noted. The policy has now been integrated with other policies in the Revised Preferred Option in policy CS11 'Sustainable Neighbourhoods'. Policy CS4 'Retail and Town Centre Uses' identified South Shore District Centre in the retail hierarchy. The detailed boundaries of all Local and District Centres will be re-assessed in the Site Allocations and Development Management DPD.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	Based on the level of information provided in the South Beach AAP, it was not possible to determine any specific impacts resulting from the proposals and whilst it is unlikely that individual proposals within the AAP would have a significant impact on the safety or operation of SRN, it is advised that consideration should be given to the cumulative impact of the developments	Support noted. The Council is no longer pursuing the South Beach AAP.

Resp No	Name/Company	Address	Comment	Council Response
0057	Government Office North west	City Tower Piccadilly Plaza Manchester	proposed across the borough. Clarification required to confirm whether the Neighbourhood Plans are (or will be) Development Plan Documents.	In the context new national planning policy including the Localism Act, and with constraints on funding, the future neighbourhood planning of these areas remains a priority, but the appropriate way forward will be through supporting Supplementary Planning Documents (SPDs), or potentially through wider based community led plans. Reference in the revised Core Strategy will accordingly only generally refer to neighbourhood plans.
0058	North West Regional Development Agency	Renaissance House Centre Park Warrington	The area is unclear on the key diagram. A more detailed map should be provided.	Policy R15 has been replaced by a more broadly based neighbourhood policy in the Revised Preferred Option and places emphasis on continuing improvement and change across the resort and inner area neighbourhoods. With no current certainty in terms of the future preparation of a South Beach Neighbourhood Plan, it is inappropriate to include a more detailed South Beach plan, but an inset plan will be included in the revised Core Strategy showing the defined wider inner area boundary and resort neighbourhoods.
Policy R16: North Beach Resort Neighbourhood				
0057	Government Office North West	City Tower Piccadilly Plaza Manchester	Clarification required to confirm whether the Neighbourhood Plans are (or will be) Development Plan Documents.	In the context of new national planning policy including the Localism Act, and with constraints on funding, the future neighbourhood planning of these areas remains a priority, but the appropriate way forward will be through supporting Supplementary Planning Documents (SPDs), or potentially through wider based community led plans. Reference in the revised Core Strategy will

Resp No	Name/Company	Address	Comment	Council Response
				accordingly only generally refer to neighbourhood plans.
0058	North West Regional Development Agency	Renaissance House Centre Park Warrington	The area is unclear on the key diagram. A more detailed map should be provided.	Policy R16 has been replaced by a more broadly based neighbourhood policy in the revised Core Strategy and places emphasis on continuing improvement and change across the resort and inner area neighbourhoods. With no current certainty in terms of the future preparation of a North Beach Neighbourhood Plan, it is inappropriate to include a more detailed North Beach plan, but an inset plan will be included in the revised Core Strategy showing the defined wider inner area boundary and resort neighbourhoods.
Policy R17: Key Resort Gateways				
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	Objects to the exclusion of a Key Resort Gateway that directs visitors to Pleasure Beach. Consider that an additional Gateway should be identified linking Yeadon Way/Waterloo Road parking to Pleasure Beach and South Beach. This would then act as a catalyst to improving connectivity and enhancing the environment in this area, which does not present an attractive approach to one of the UK's most popular tourist attractions.	Central Corridor is one of the key resort gateways identified which includes Seasiders Way and a number of resort car parks close to the Pleasure Beach and adjacent to the area defined as South Beach. The Policy promotes improvements to vehicle and pedestrian linkages through the Corridor and improved parking and reception facilities, and this is considered sufficient to improving connectivity and enhancing the environment in this area. In addition, Policy CS21: Arrival and Movement supports improvements to enhance the quality of experience on arrival and the quality of movement within the resort.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	Generally supportive.	Support noted.
0035	Blackpool, Fylde &		Suggest the addition of Talbot Road	Whilst Talbot Road is dealt with in the Town Centre

Resp No	Name/Company	Address	Comment	Council Response
	Wyre Economic Development Company		could also be described as a key resort gateway.	policies, including the Central Business District (Talbot Gateway) Policy, it is agreed that it forms a key resort gateway to the town centre, and therefore the Revised Preferred Option proposes to include it .
Policy R18: The Promenade				
0034	Head of Heritage Heather Morrow	Blackpool Council	Supports this policy. Comments that by retaining and enhancing the quality and vibrancy of the Promenade ensures that it continues and guarantees its original purpose as the main artery of the resort.	Comment noted. This policy has been removed from the Revised Preferred Option and is now included within other policies.
0037	Muse Developments Ltd		Talbot Gateway proposes up to 4 new hotels which will assist the Council in achieving its aim of improving visitor accommodation within the Town Centre. Supports the focusing of hotels to existing established resort areas and within the Town Centre.	Comment noted.
0059	Karen Taylor	Themis Chambers Suite 14067 145-147 St Johns Street London	Opposed to this policy as it promotes new hotel development. Asks how the Core Strategy on one hand seeks to decrease the number of bed spaces whilst still making provision for new hotels.	There is a generally accepted need across the resort to reduce the amount but to uplift the quality of resort holiday accommodation. The Core Strategy sets out the range of policies to seek to provide for this to happen. New hotels provide a different offer and promoting opportunities for new development in parallel with improvements to existing stock is fundamental to providing Blackpool with a more successful holiday future.
Policy R19: Main Holiday Accommodation Areas				
0002	Mr D E Askham	Crystal Lodge Holiday Apartments 10-12 Crystal Road	In favour of Policy R19A. Current Resort Neighbourhood Areas should be retained but planning relaxed across the whole	There is strong support to continue to retain holiday accommodation use and resist change in areas where this is realistic and it continues to be

Resp No	Name/Company	Address	Comment	Council Response
		Blackpool	<p>area to allow conversion to residential accommodation.</p> <p>Key issue is the prevention of HMOs.</p> <p>All new hotels must be accredited to a minimum of 4 stars.</p>	<p>the dominant use. This is supported by the Council, with the reduced areas defined in the adopted Holiday Accommodation SPD.</p> <p>The Council could not legally enforce all new hotels to be 4 star standard. The need is for a full range of good quality accommodation whether 1, 2, 3 or 4 star.</p>
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	<p>Support this policy in principle.</p> <p>Request that the Core Strategy makes clear that further high quality hotel development at Pleasure Beach will be supported. This can act as a catalyst to the upgrading and redevelopment of hotels elsewhere in Blackpool.</p>	<p>Comment noted.</p> <p>Revised Preferred Option policy CS20 'Leisure and Business Tourism' supports new hotel development in the town centre, resort core and adjacent holiday areas which includes the potential for further high quality hotel development at the Pleasure Beach which is located within the Resort Core.</p>
0015	Bourne Leisure Ltd		<p>Consider that additional holiday areas outside the main resort area, such as Marton Mere should be identified as important holiday areas, with planning policies put in place to support their enhancement and long term future. It will be important for the Council to ensure that tourism companies are allowed to invest in their businesses, through positive planning policies in order to improve the overall tourism offer, promote facilities and extend the visitor season.</p>	<p>The policy focus of the Core Strategy is on retention, improvement and provision of new holiday accommodation in the town centre and resort core. However, it is accepted that the specific accommodation provided at Marton Mere Caravan Park is a further complementary, distinctly different and important element of Blackpool's supporting holiday accommodation offer. Policy CS20 of the Revised Preferred Option reflects this and the Council's wider policy towards new tourist facilities outside the main resort and town centre.</p>
0034	Head of Heritage	Blackpool Council	Suggests that reference should be made	Comment noted. While there is a strong frontage

Resp No	Name/Company	Address	Comment	Council Response
			to the detailed information gained from the historic characterisation studies to ensure that those building with historical significance will be safeguarded and protected.	<p>of key hotels of historic importance and heritage interest along the main seafront promenade, Revised Preferred Option policy CS8 'Heritage recognises and specifically refers to the wider need (informed by the characterisation studies) to identify a local list of historic buildings across the resort which should be conserved and safeguarded.</p> <p>It is not appropriate to make further reference under holiday accommodation policies as this point relates to a wider focus, and is not specific to holiday accommodation.</p>
0043	Mr Chris Wood	46 Palatine Road Blackpool	<p>Deeply concerned about the proposals in the Core Strategy particularly relating to the Holiday Areas, specifically his property being outside of the proposed Main Holiday Accommodation Area.</p> <p>Raises concerns that properties outside the Main Holiday Accommodation Area will turn into HMOs.</p> <p>States it is too costly to convert from holiday to permanent accommodation.</p>	<p>The policies outside the proposed main holiday areas provide owners with greater flexibility to retain properties in holiday use or convert to residential use, and are focused on uplifting quality and resisting poor quality HMO residential uses.</p> <p>The specific issue regarding the detailed boundaries in Policies R19 and R20 was not a matter for the Core Strategy and has been dealt with as part of the detailed consultation on the Supplementary Planning Document on Holiday Accommodation, in parallel with consultation on the Core Strategy.</p> <p>The Council has put many measures in place to deals with HMOs including the Selective Licensing Project, Proposed Article 4 Direction and Residential Conversions SPD.</p>

Resp No	Name/Company	Address	Comment	Council Response
0056	Mr Richard De Longa	4 Pleasant Street Blackpool	Proposes the Lord Street Main Holiday Accommodation Area be extended to include Pleasant Street, between Dickson Road and Braithwaite Street.	The specific issue regarding the detailed boundaries in Policies R19 and R20 was not a matter for the Core Strategy and has been dealt with as part of the detailed consultation on the Supplementary Planning Document on Holiday Accommodation, in parallel with consultation on the Core Strategy.
0058	North west Regional Development Agency	Renaissance House Centre Park Warrington	States that it is not possible to identify these areas thoroughly on the key diagram.	The detailed boundaries are not a matter for the Core Strategy and have been defined in the Supplementary Planning Document on Holiday Accommodation, in parallel with consultation on the Core Strategy.
0059	Karen Taylor	Themis Chambers Suite 14067 145-147 St Johns Street London	<p>In disagreement with this policy.</p> <p>Suggests that many businesses will be excluded purely on a postcode basis. Consider this to be unreasonable.</p> <p>Asks whether there is any financial support for those businesses excluded from the areas.</p> <p>Ask whether future funding will be available to those holiday accommodation properties outside the new proposed holiday areas.</p> <p>Queries the justifications behind the designation of the 6 holiday areas.</p>	<p>The specific issue regarding the detailed boundaries in Policies R19 and R20 was not a matter for the Core Strategy and has been dealt with as part of the detailed consultation on the Supplementary Planning Document on Holiday Accommodation, in parallel with consultation on the Core Strategy.</p> <p>The Core Strategy policy relates to the future use rather than potential funding support for the holiday areas. Policies R19 and R20 clarify the Council, will continue to support and promote existing holiday accommodation whether inside the main holiday accommodation or in mixed (holiday accommodation/ residential) neighbourhoods.</p> <p>The basis for the justification of the six holiday areas is set out in the Fylde Coast Accommodation</p>

Resp No	Name/Company	Address	Comment	Council Response
				Study, referred to in the supporting text to Policy R12 (Resort neighbourhoods) and which forms an important element of the evidence base of the Core Strategy. The justification is also set out in the adopted Holiday Accommodation SPD.
Policy R20: Mixed Neighbourhoods				
0012	Blackpool Holiday Trades Association	Queen Victoria Hotel 60 Station Road Blackpool	Consider that the Council's control of the spread of multi-occupation in the neighbourhood has been very weak to date, therefore having a negative effect. The transition to a 'good quality residential neighbourhood' will not be possible without effective control of the volume and management of HMOs.	The adopted "New Homes from Old Places" Supplementary Planning Document has been will provides strict guidance to developers who want to convert from holiday to permanent accommodation. Change to residential use will only be permitted which conforms to the Council's revised higher standards. In parallel the Council fully recognises the need and is taking a stronger and more pro-active approach to dealing with problem HMOs.
0054	Ms Vicki Gale	22 Alexandra Road Blackpool	<p>Raises concerns with this policy.</p> <p>States that if significant numbers of hotels, guest houses and ex-hotels are to be removed that requires a strategy to replace them with viable alternatives. Conversion to single dwelling seen as an unrealistic solution. There has to be a strategy for supporting and maintaining properties in the mixed areas.</p>	<p>The policies outside the proposed main holiday areas provide owners with greater flexibility to retain properties in holiday use or convert to residential use, while uplifting quality and resisting poor quality HMO residential uses.</p> <p>The Core Strategy Policies R19 and R20 (CS23 and 24 in the Revised Preferred Option) provide the basis for consideration of future planning applications and continue to support and promote existing holiday accommodation whether inside the main holiday or in mixed use neighbourhoods. The policy does not require conversions from hotel</p>

Resp No	Name/Company	Address	Comment	Council Response
				<p>use, but gives more flexibility to do so.</p> <p>It should be noted, following public consultation on the detailed boundaries in the Supplementary Planning Document on Holiday Accommodation, that Alexandra Road is now included within the South Beach Main Holiday Accommodation Area in the SPD.</p>
0055	Gillian Wilsden	82 Withnell Road Blackpool	<p>Concerns regarding the Main Holiday Accommodation Areas and Mixed Neighbourhood</p> <p>Suggests the enforcement of en-suite accommodation, as this would reduce the amount of bedrooms by approximately one third, and considerably upgrade the standards in the process.</p> <p>Concerns raised over the conversion of properties out on the holiday areas to HMOs.</p>	<p>The Council cannot legally enforce to require en-suite accommodation in terms of existing properties, but sets out the policy basis whereby proposals for improvements, change of use, and new accommodation which did not meet sufficient quality standards would not be permitted.</p> <p>Change to residential use will only be permitted which conforms to the Council's revised higher standards. In parallel the Council fully recognises the need and is taking a stronger and more proactive approach to dealing with problem HMOs.</p>

Chapter 6: M55 Hub Growth Point

Resp No	Name/Company	Address	Comment	Council Response
Marton Moss/M55 Hub General Comments				
0020	Lancashire County Council	County Hall PO Box 100 Preston	Support the approach of regeneration of the Urban Core and the promotion of the M55 Hub of the growth point in principle. Note that the planned growth set out is dependant on the support of Fylde Borough Council, which at the time of publication has not been confirmed.	Comment noted. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option. Subsequent changes to the Core Strategy seek to further ensure an appropriate scale and focus of integrated development within and on the edge of Blackpool (Moss House Road and Whydyke)
			A small area of Common Edge referred to in Chapter 6 is covered by the minerals and waste development framework's emerging policy on mineral safeguarding areas. There may be an opportunity for prior extraction of any mineral resource should the development proposal result in significant redevelopment.	Comment noted.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	Whilst the Agency has some concerns regarding the scale of development proposed at the M55 Hub and the potential impact on the operation and safety of the SRN, the sustainability	The scale of proposals in the Blackpool Core Strategy has been re-focused on a reduced level of development within South Blackpool(Whydyke Farm and Moss House Road), reflecting both the realities of the housing market and concerns over

Resp No	Name/Company	Address	Comment	Council Response
			aspirations are supported, particularly with regards to providing community facilities within walk able distance from jobs and homes and improving bus services and sustainable patterns of movement.	development of the Moss. The proposed housing is considered to be more readily integrated with the existing urban area, including sustainable transport linkages. Specific further work is being undertaken to test the impact of the development now proposed in consultation with the Highways Agency
0030	Sainsburys Supermarkets Ltd		Acknowledge that this is a concept masterplan and has not yet been agreed by Blackpool and Fylde Councils but support the aspiration for this sustainable urban extension. Sainsbury's believe this is a key forthcoming area of development that will assist Blackpool in achieving its aspired status and growth.	Comment noted, however, the Revised Preferred Option no longer allocates any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
0048	Lancashire County Council	County Hall Po Box 26 Lancashire	Major landowner within M55 hub. Site suitable and available for development within 5 years. Actively investigating options to facilitate the completion of the M55-Heyhouses link.	Comment noted – with it understood the major landholding relates to lands in Fylde.
0049	Mrs Kathryn Rooney	12 Hardwicke Road Narborough	Queries the use of phasing for housing development at the Moss/Hub.	The Revised Preferred Option no longer allocates any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is

Resp No	Name/Company	Address	Comment	Council Response
			<p>Suggests the costs to improve the sewers and drainage could be shared between several developers as it in other areas in the country.</p> <p>Asks whether limiting development by 1200 dwellings until 2021 or beyond will not meet the required housing targets. Most of the land on Marton Moss is fallow land and is no longer used for agricultural purposes.</p> <p>Supportive of a Park and Ride system which would reduce traffic congestion and encourage people to purchase</p>	<p>reflected in Policy CS27 of the Revised Preferred Option.</p> <p>With a reduced level of housing now proposed within South Blackpool, there is no phasing requirement.</p> <p>This issue is to be considered in the Infrastructure and Delivery Plan, and addressing how best to provide required infrastructure, including sewers and drainage.</p> <p>The Government has proposed the end of regional housing targets and the Revised Preferred Option has reviewed Blackpool's proposed housing targets.</p> <p>The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>Comment noted.</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>property in this area.</p> <p>Suggests there is a shortage of 'executive' housing in Blackpool and developing land on the Moss would facilitate expanding this type of housing.</p>	<p>Comment noted and this is fully recognised as part of the need for development on the Moss</p>
0052	North and Western Lancashire Chamber of Commerce	1-2 Lockheed Court Amy Johnson Way Blackpool	<p>Fully supportive of the aims and objectives. Improvements need to be made to Yeadon Way gateway.</p>	<p>Comment noted.</p>
0058	North West Regional Development Agency	Renaissance House Centre Park Warrington	<p>Policies in Chapter 6 focus on residential development and supporting community facilities with little emphasis on employment.</p> <p>The SA focuses on the implementation of providing 2700 houses at the M55 Hub, rather than its potential economic benefits. Would be helpful if the Core Strategy provided some indication of the amount of employment land that could be provided as part of the overall mix of uses both within Blackpool and in the M55 Hub as a whole.</p>	<p>In conjunction with the reduced housing figures, the Revised Core Strategy gives increased emphasis to employment provision in south Blackpool. The nature of the lands on the Moss within Blackpool mean it is not itself appropriate for employment development</p> <p>The Revised Preferred Option no longer allocates any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>Policy CS4 of the Revised Preferred Option prioritises for a strengthened town centre and the south Blackpool employment focus is highlighted in policies CS3 and CS25 of the Revised Preferred</p>

Resp No	Name/Company	Address	Comment	Council Response
				Option.. The Sub-Regional Employment Land Statement reflects the latest position and has been revised and updated for Blackpool, Fylde and Wyre.
0059	Karen Taylor	Themis Chambers Suite 14067 145-147 St Johns Street London	<p>Comment that there is no need for housing development on Marton Moss. Disagree with the use of greenbelt for housing with no justification.</p> <p>Consider that any development on the Moss would conflict with policies S6 and S7 and that any housing development would not sustain/enhance the biodiversity of protected habitats and species, would not minimize waste generation, noise or energy consumption.</p> <p>Suggests it conflicts with the recommendations made by Hyder in the Sustainability Appraisal.</p>	<p>The Revised Preferred Option no longer allocates any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>Notwithstanding the above, the earlier recommendations in the Hyder Sustainability Appraisal caveated support for substantive housing development on the Moss with the need to ensure it formed part of a wider sustainable new community which addressed impacts and provided new jobs and supporting community facilities as well as homes. The refocused proposals in the Revised Preferred Option have also been subject to independent reassessment as part of the continuing Sustainability Appraisal process. The revised proposals reflect both the realities of the housing market and the previous representation received.</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>Suggests the development of housing on the Moss will result in housing in the resort being empty.</p> <p>Ask why there is a complete change of policy compared with the current adopted local plan which protects this area from any form of development.</p>	<p>The development at South Blackpool is complementary to and will be supportive of development in the inner area of Blackpool. While seeking to widen the mix of housing both in South Blackpool and in the inner areas, the two locations effectively address and will meet the needs of substantially different elements of the Blackpool housing market. Policies M3 and G5 of the Preferred Option set out the basis of this approach.</p>
0060	Fylde Borough Council	Town Hall Lytham St Annes	<p>Do not support the preferred option. Acknowledges the health warnings on pages 95 and 96 which respectively state 'in Fylde Council's terms' but does not imply any acceptance; and has not been agreed. If the M55 Hub is to be an option at all for Fylde it will have to be considered alongside a number of other spatial options. Fylde Borough Council is intending to publish its Issues and Options Paper later this year. Fylde do not support or commit to the Joint SPD referred to on page 94.</p> <p>Notes that page 93, para 7 states 'viewed separately the proposed development of the lands in Blackpool still represents a logical and deliverable extension of the existing Blackpool urban area on lands within the boundary.' However, there is a somewhat contradictory footnote on Page 6 which states that 'the alignment</p>	<p>The Revised Preferred Option no longer allocates any housing on the remaining lands at the Moss or development at the M55 Hub. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>The focus of the proposal in the Blackpool Core Strategy Preferred Option was on lands in Blackpool, but presentation did focus on the potential for the Moss to also come forward as part of a potential wider development. In the event, the Government's announcement of its proposed ending of regional housing targets, the continuing realities of the housing market downturn, and wider representations on the proposed development on Marton Moss, as well as Fylde Borough Council's own concerns, have all</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>of any Core Strategy proposals for development on the edge of Blackpool is also dependent on the decisions of Fylde Council'.</p> <p>In addition to the above there is also conflict between the Preferred Option and David Lock Associates (DLA) 'M55 Hub Conceptual Master Plan' Draft Final Report (May 2010) which you are aware of. Para 6.2 of DLA's Draft Final Report states 'The M55 Hub can only be delivered in the comprehensive manner advocated if the policy frameworks for both Councils are aligned. This section on Delivery & Implementation makes the assumption that a consistent and comprehensive policy framework will be put in place.'</p> <p>Understands that the of the M55 Hub is one which is dependant upon a critical mass of development taking place if it is to be considered at all viable. The DLA Draft Final Report now shows an indicative residential capacity of approximately 5,000 dwellings, not 7,000. Questions if there may be a further reduction in both housing numbers and employment land requirements. If either the 'Blackpool</p>	<p>been reflected in a substantial reduction in the scale of housing now proposed within South Blackpool</p> <p>The flexibility remains to in future accommodate potential decisions of Fylde Borough Council for adjoining lands in consultation with Blackpool Council.</p> <p>Notwithstanding the above, the jointly commissioned David Lock Associates (DLA) Conceptual Masterplan questioned the deliverability of a wider new community and its associated benefits without a sufficient scale of new homes and jobs. The concerns remain that without such wider provision what would result would be a series of ad hoc incremental developments rather than the comprehensive nature of development previously considered in the masterplan.</p> <p>The alternative, as set out in the DLA report, would therefore be for a substantially reduced more organic scale and form of housing development which can be more readily integrated with the existing Blackpool urban area. The proposals for the potential development of a further 900 homes in Blackpool, beyond those with existing planning permission, and confined to the lands between</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>Only' version of growth at the end of the M55 or a significantly reduced Blackpool / Fylde Hub were to proceed, then this is unlikely to deliver the associated community facilities, district centre, schools, etc. In any event the final Conceptual Master Plan shows the majority of community facilities as being beyond Blackpool's boundary. (Please refer to specific comments in relation to Figure 11 below). If a 'Blackpool Only' version of growth at the end of the M55 was to happen I think this is more likely to result in a series of ad-hoc, incremental developments rather than the comprehensive nature of development illustrated in the Conceptual Master Plan.</p> <p>In view of the above it is my opinion that the Preferred Option does not adequately demonstrate that lands in Blackpool at the M55 Hub can be delivered in isolation.</p>	<p>Yeadon Way and Progress Way specifically provide for this way forward, linked to the wider opportunities within the existing south Blackpool urban area. The eventual decisions of Fylde Borough Council, in the absence of pursuit of a wider new community at the Hub, will need to have similar regard to ensure they can be readily integrated, aligned and complement proposals in Blackpool to avoid the concerns raised by Fylde Borough Council's representations.</p>
			<p>Page 96, Figure 11: Suggests the area on the Fylde side should be shown as either hatching or not at all, rather than a detailed master plan which should be shown on the Blackpool side. If shown as per page 25, Figure 5, this would help to draw a distinction between the two parts</p>	<p>The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where</p>

Resp No	Name/Company	Address	Comment	Council Response
			given the fact that the M55 Hub concept has not yet been agreed as an option in Fylde. If, as suggested at page 93 Para 7, a 'Blackpool Only' version of the growth at the end of the M55 can be delivered then my suggestion is even more pertinent.	development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option. A revised South Blackpool has been prepared for the Revised Preferred Option.
Policy M1: Strategic Allocations				
0001	Rashmi Pandav Blackpool Congregation of Jehovah's Witnesses	9 Lowthorpe Crescent Preston	Welcomes and support the reference made in Area D to community uses at Whyndyke Farm. However, notes that Areas A-C will require an allocation of community uses and timescales.	Comment noted. The community use referred to in policy M1 was a Mental Health Unit which now has planning permission. Any development on the wider Whyndyke lands will be dealt with through the Fylde Council development management process or core strategy process, whichever comes first. With regards to community facilities. The Council is no longer pursuing housing development on the Moss. The neighbourhood planning process will allow for new community uses if desired by the community.
0006	Mr D Challinor	8 Glencross Place Blackpool	Opposed to the proposals for Marton Moss because: 1. Contradicts current trends for green policy and will lead to the removal of one of Blackpool's few green areas. 2. No plan for where the new population will find employment. 3. It would be wiser to utilise redundant hotels to reach the required housing	The Council is no longer pursuing housing development on the Moss.. The reduced scale of development proposed is also aligned with an increased focus on complementary employment opportunities in south Blackpool. The major focus of the Core Strategy is on inner area regeneration, with a range of policies which address issues regarding the current over provision

Resp No	Name/Company	Address	Comment	Council Response
0008	Ms Angelia Hinds	21 Moss House Road Blackpool	<p>numbers.</p> <p>In the light of recent Government changes and revocation of the RSS housing figures, it is unlikely that Fylde Council will continue with their Core Strategy. Asks if the Blackpool Core Strategy will be revised to include alternative proposals, such as the inclusion of additional schools and employment areas?</p> <p>Also asks when the joint SPD with Fylde will be produced.</p>	<p>of holiday accommodation in Blackpool.</p> <p>The Council is no longer pursuing housing development on the Moss.. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>The reduced scale of development proposed is also aligned with an increased focus on complementary employment opportunities in south Blackpool. Future proposals for schools will need to be aligned with the reduced scale of development proposed in the Revised Preferred Option</p> <p>Reflecting the focus on lands within Blackpool, reference in the revised Preferred Option is made to the potential for a neighbourhood plan for Marton Moss. There is now no intention to prepare a joint SPD with Fylde Council.</p>
0008	Ms Angelia Hinds	21 Moss House Road Blackpool	<p>All housing figures from the RSS will have to be revisited in the Core Strategy and SHLAA and reasoning behind the proposed development at Marton Moss and the M55 Hub.</p>	<p>The approach taken in the Revised Preferred Option substantially reduces the scale of proposed housing in Blackpool. The reduced scale of development proposed is also aligned with an increased focus on complementary employment opportunities in south Blackpool..</p>

Resp No	Name/Company	Address	Comment	Council Response
0009	Lesley M Bosworth	36 Haig Road Blackpool	Objects to the proposals for Marton Moss: 1. Building on Marshy land can be disastrous. 2. This green area should be protected. 3. Large amount of objections by local population.	The Council is no longer proposing housing development on Marton Moss. For the case of lands at Whyndyke Farm and Moss House Road, Policy CS26 'South Blackpool Housing Growth' recognises and highlights the need to address drainage and surface water management issues .
0018	Kensington Developments Ltd	94 Park View Road Lytham	Support the broad locations for development. The number of dwellings should reflect the capacity of the sites rather than being an arbitrary figure.	Comment noted, however the Council is no longer proposing housing development on Marton Moss
0019	Mr Joe Chabba		Supports proposals for the M55 hub provided: Housing has green areas and off street parking. Scenery is retained Developers have an interest in the local community The roads should be widened There should not be any compulsory purchases	Comments noted. The Council is no longer proposing housing development on Marton Moss. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
0020	Lancashire County Council	County Hall PO Box 100 Preston	The lettering/notation of the various sites is not clear for policies M1 and M2.	The Council is no longer proposing housing development on Marton Moss A revised plan illustrating South Blackpool will be provided in the Revised Core Strategy.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	The development proposed at Marton Moss / M55 Hub is likely to have the most significant impact for Agency out of	The scale of proposals in the Blackpool Core Strategy has been re-focused with the Council no longer proposing housing development on Marton

Resp No	Name/Company	Address	Comment	Council Response
			<p>all the development proposed within the strategy, given the proximity to Junction 4 of the M55 and the generally unsustainable location with regards to existing levels of sustainable accessibility and the lack of sustainable transport provisions.</p> <p>The Agency expects that the implications for transport and infrastructure, particularly with regards to the increase in trip generation and the requirements and deliverability of supporting infrastructure will have been identified and appropriately assessed. At the time of this response the traffic modelling being undertaken in support of the Hub was not available for the Agency to review. The Agency will expect that this information will be made available as soon as possible and particularly prior to consultation on the Publication draft.</p>	<p>Moss</p> <p>Specific further work has been undertaken to test the impact of the various development now proposed (Whyndyke and Moss House Road) in consultation with the Highways Agency.</p>
0031	Sport England	Building 3 Universal Square Devonshire Street Manchester	Policy M1 identifies four sites to be allocated for residential development which include existing sports facilities such as football pitches, school playing fields, tennis courts, and equestrian facilities. Whilst the text following the policy makes clear that the intention is not for comprehensive redevelopment of these areas, the policy itself would	The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred

Resp No	Name/Company	Address	Comment	Council Response
			<p>appear to suggest that the principle of residential use on a site which is currently used for sport would be acceptable.</p> <p>In Sport England's experience, housing allocations which have not made explicit reference to existing sports facilities have proved to be contentious. In light of this Sport England would wish to see the policy amended to make explicit that existing sports facilities would be safeguarded.</p>	<p>Option.</p> <p>Existing sports facilities are located south of Progress Way. Revised Core Strategy policy CS6 'Green Infrastructure' refers to the protection of existing green infrastructure including sports pitches, playing fields etc.</p>
0036	Closetlink Ltd		<p>Supportive of reference to site D. Suggest that more emphasis should be placed on the fact that it is a cross boundary site with the smaller percentage being located in Blackpool's boundary. The allocation of site D in isolation does not portray the full picture.</p> <p>Reference should be made to residential on site D in conjunction with development of a mental care hospital. No figure is identified for the potential number of dwellings on the site, which should read as 100 for site D.</p>	<p>Policy CS26 'South Blackpool Housing Growth' identifies that the land at Whyndyke is mainly in Fylde. A map showing South Blackpool identifies the wider Whyndyke land that it within Fylde's boundary.</p> <p>Reference is made in the Revised Preferred Option policy 'South Blackpool Housing Growth' to proposed housing development at Whyndyke Farm.</p> <p>Decisions on the future development potential of the wider remaining lands will require and depend on close co-operation between Blackpool and Fylde Councils.</p>

Resp No	Name/Company	Address	Comment	Council Response
0054	Ms Vicki Gale	22 Alexandra Road Blackpool	Concerned that the scale of the Council's proposals for development on the outskirts of the town – especially Marton Moss. Consider them unwise environmentally and economically and risk diverting resources and focus on the need to regenerate Central Blackpool rather than planning communities focused rather on shopping and spending towards Preston than in Blackpool.	The Council is no longer proposing housing development on Marton Moss. The overriding focus of the Core Strategy is on the regeneration of central Blackpool, with a reduced proposed level of supporting growth on South Blackpool. The important balance between homes and jobs is fully recognised, with the provision of a mix of quality homes within Blackpool itself being an important element of meeting resident needs within a balanced community. The proportion of people who live and work within Blackpool is high compared to many areas, and will be supported by its regeneration and development of better shopping and supporting facilities in central Blackpool. Its successful long term future must also be supported by a balanced mix of new housing.
Policy M2: Phased Release of housing sites at Marton Moss/M55 Hub				
0008	Ms Angelia Hinds	21 Moss House Road Blackpool	Queries whether Area A should be included in the policy as the land has now received outline planning permission.	The area is excluded from the strategic site allocations in the Revised Preferred Option. It is recognised in policy 'South Blackpool Housing Growth'.
0008	Ms Angelia Hinds	21 Moss House Road Blackpool	Queries whether inner regeneration needs to keep pace with development on the periphery. Suggests conflicting statements have been made in the document.	Inner area regeneration and development on the periphery are proposed as fundamental supporting elements of uplifting the overall range and mix of Blackpool's housing offer. The type and format of development, funding linkages and pace of development will be complementary and coordinated, but ultimately it is acknowledged the extent of co-ordination and pace of development will also be dependent on the housing market, public funding, and the wider progress of

Resp No	Name/Company	Address	Comment	Council Response
0013	Blackpool LSP Environment Sub-Group	Lutra House Dodd Way Walton Summit Preston	<p>A Surface Water Management plan is being prepared; however, as yet no plans have been produced that show significant infrastructure capacity issues with regards to foul and surface waters can be resolved.</p> <p>Whilst mention is made in Policy M2 of a phased approach to the development at Marton Moss, unless a plan is in place to deliver improvements to the drainage network, all that will be achieved is gradual further deterioration of water quality from illegal discharges from the sewerage network. In order to avoid this and a significant deterioration in bathing water quality (and resulting impact on tourism) the group considers that the issues around foul and surface water capacity must be resolved before any commitment is given for a large scale expansion of Blackpool. We would wish to see the proposed solutions from the Surface Water management Plan agreed and a commitment to deliver these as part of any plans to expand Blackpool. These must be in place before the Core Strategy is submitted to the Secretary of State.</p>	<p>regeneration.</p> <p>The Council is no longer proposing housing development on Marton Moss.</p> <p>Notwithstanding this, the Infrastructure and Delivery Plan which will be published alongside the Pre-Submission version of the Core Strategy will set out the latest progress of ongoing studies and consultation on these issues. Information from the Surface Water Management Plan, Water Cycle Study in conjunction with ongoing modelling work of United Utilities will identify the necessary measures required to be undertaken to support the future level of development now proposed in South Blackpool.</p>

Resp No	Name/Company	Address	Comment	Council Response
			No mention is made in the Core Strategy to the Water Framework Directive, which requires all water bodies to reach good ecological status/potential.	A range of Core Strategy Policies safeguard water quality and habitats, and extensive reference is made to water quality issues in the supporting evidence base. This relates to both bathing waters and other water bodies which are safeguarded and protected by Blackpool's wider Local Development Framework policies.
0018	Kensington Developments Ltd	94 Park View Road Lytham	<p>Not supportive of strict phasing. Consider that development of sites B and C post 2016 would adversely impact on the continued supply of housing.</p> <p>The ban on conversions and infill is considered to be contrary to national guidance and contrary to the stated output from such conversions in Policy S3. Such small scale development would not, if submitted, prejudice the principles of the M55 Hub.</p>	<p>The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>The opportunity will be to explore with the community the potential for landscape and built enhancement which could include a relaxation in the restrictions on conversions, replacement dwellings and the scale of extensions is appropriate. This will be considered as part of a future neighbourhood planning process, following adoption of the Blackpool Core Strategy.</p>
0021	Ms Anne Frith	Runnell Cottage Chapel Road Blackpool	It is important to develop new areas for housing to keep a community in Blackpool. There is a transient population in Blackpool and areas such as Marton Moss and South Shore provide	Comment noted, however the Council is no longer proposing housing development on Marton Moss.

Resp No	Name/Company	Address	Comment	Council Response
			stability. Many parts of the Moss are neglected. Development would provide improvements to the area.	
0023	Environment Agency	Lutra House PO Box 519 Preston	State that although phasing of sites may help in the provision of infrastructure and it may not be the solution. The Environment Agency do not want to see an increase in volumes of surface water discharged into the combined system and if the system is intended to accept increases in fould sewage, then it will be necessary to reduce the volumes of surface water discharging to the system	The Council is no longer proposing housing development on Marton Moss. These issues will however be addressed in the Infrastructure and Delivery Plan (to be published at Pre-Submission stage). More detailed assessments are being undertaken through the Surface Water Management Plan and the Water Cycle Study, together with ongoing modelling work by United Utilities. This will identify necessary measures required to be undertaken to support the future level of development now proposed at South Blackpool, reduce the volume of surface water discharged into the system and reduce the risk of spills to the Irish Sea adversely impacting on bathing water quality.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	Consideration needs to be made when phasing new housing development as to how it will be coordinated with the delivery of supporting infrastructure. The Agency therefore considers that it is essential to identify how new housing sites will be phased and aligned with the delivery of new or improved physical infrastructure / sustainable transport provisions which are required to support the delivery of new housing sites. This is particularly pertinent for the M55 Hub strategic development sites where new	The Revised Preferred Option no longer allocates any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option. However, the Infrastructure and Delivery Plan will be informed by traffic impact assessments of

Resp No	Name/Company	Address	Comment	Council Response
			and improved physical infrastructure may be required and where new supporting sustainable transport provisions and other community facilities and services need to be delivered to support the sustainable delivery of the proposed housing growth.	potential development at South Blackpool in consultation with the Highways Agency to ensure proposals are supported by required highways and transport infrastructure improvements.
0036	Closetlink Ltd		<p>This policy does not refer to the Whyndyke Farm site in the phasing schedule and fails to reflect the fact that the sustainable extension must be considered holistically.</p> <p>Any phasing of development must be considered for the M55 Hub Growth Point as a whole and be agreed by both Councils.</p>	<p>The re-focus on reduced housing numbers within Blackpool, and the approval of the mental health hospital mean this site is now included in policy CS26 'Housing Growth' in the Revised Preferred Option.</p> <p>Reference will continue to be made in the supporting text to cross boundary issues, including the potential for future development of this site.</p> <p>The Core Strategy sets out no strict phasing of proposed development on future lands within Blackpool.</p>
Policy M3: New Neighbourhood Development: Housing Mix				
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	The Agency would wish to ensure that point (iii) in relation to providing for Blackpool's needs is ensured rather than the housing at the hub becoming an area where those who choose to live there are those who work in areas external or distant from the site, and by virtue make increased journeys by use of the SRN. As such appropriate connectivity issues should be considered to ensure the ease	The Council is no longer proposing housing development on Marton Moss/M55 Hub. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is

Resp No	Name/Company	Address	Comment	Council Response
			at which movements between the area and the Blackpool core are strengthened.	reflected in Policy CS27 of the Revised Preferred Option.
Policy M4: New Neighbourhood Development: Community				
0008	Ms Angelia Hinds	21 Moss House Road Blackpool	Questions whether a primary school will be required for the pre 2016 development.	<p>The Council is no longer proposing housing development on Marton Moss/M55 Hub. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>However, monies towards the provision of a new primary school are required as part of the existing planning permission for Moss House Road. Further funding will be provided from any future planning permissions. An application has been submitted for Whyndyke Farm which includes a new primary school,</p>
0020	Lancashire County Council	County Hall PO Box 100 Preston	State that evidence needs to be provided to support the Core Strategy in order to demonstrate how community, social and green infrastructure will be delivered.	<p>The Council is no longer proposing housing development on Marton Moss/M55 Hub. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the</p>

Resp No	Name/Company	Address	Comment	Council Response
				Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	The Agency is supportive of requiring new housing development at the M55 Hub to provide community facilities, services and schools to support the sustainable delivery of the proposed housing growth. The provision of such community infrastructure, particularly where it is provided within a walk-in catchment should help to reduce the need to travel.	<p>The Council is no longer proposing housing development on Marton Moss/M55 Hub. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>The neighbourhood planning process for Marton Moss will allow for new community uses if desired by the community.</p>
0031	Sport England	Building 3 Universal Square Devonshire Street Manchester	<p>Supports this policy as it recognises that the proposed development would create additional need for infrastructure. However, Sport England would recommend that bullet point iv) of the policy is amended to read "Open space, sport and recreation facilities".</p> <p>State that a PPG 17 compliant audit of provision / assessment of current and future needs are considered essential to</p>	<p>The Council is no longer proposing housing development on Marton Moss/M55 Hub. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>appropriately identify the nature and level of open space, sport and recreation provision required.</p> <p>It would appear that the intention is to retain some existing sports facilities within the sites allocated for housing (as the text on page 106 refers to integration with existing facilities such as South Shore Lawn Tennis Club, Squires Gate FC and Blackpool Wren Rovers FC). This intention to retain such facilities is not made clear in policy M1 though (see comments above) which allocates the broader areas the facilities sit within for housing.</p>	<p>Option.</p> <p>The Core Strategy is informed by the Council's 2009 Audit of Sports and Recreation Facilities</p>
Policy M5: Neighbourhood Character, Marton Moss/M55 Hub				
0013	Blackpool LSP Environment Sub-Group	Lutra House Dodd Way Walton Summit Preston	<p>Within Policy M5, mention is made of a biodiversity strategy for the M55 Hub / Marton Moss and it is vital that this strategy must (not should) be implemented as part of any development of the Moss.</p> <p>The strategy must be developed in advanced of any development and should aim to provide a step change increase in biodiversity. The strategy could look to expand the Local Nature reserve status around Marton Mere to include other adjacent important sites</p>	<p>The Council is no longer proposing housing development on Marton Moss/M55 Hub. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>Protecting biodiversity is covered by policy CS6</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>for biodiversity. The biodiversity strategy needs to be designed as a comprehensive plan for the whole of the Moss to ensure that its implementation can be phased in as the development of the Moss progresses through to 2026.</p> <p>The biodiversity strategy for the M55 Hub / Marton Moss mentioned in Policy M5 should be extended to cover Blackpool as a whole.</p>	<p>'Green Infrastructure' of the Revised Preferred Option.</p> <p>Blackpool Council supports the Lancashire Biodiversity Action Plan and the measures it promotes across Blackpool</p>
0017	English Heritage	Suites 3.3 and 3.4 Canada House 3 Chepstow Street Manchester	More specific reference should be made Marton Moss Characterisation Study.	Specific reference is made to the Study in the Revised Preferred Option.
0021	Ms Anne Frith	Runnell Cottage Chapel Road Blackpool	Agree with keeping the neighbourhood character of the Moss including the lanes, dykes and hedgerows. Green spaces should be retained for leisure and allotments provided.	Comment noted. The emphasis for Marton Moss in the Revised Preferred Option is the retention and enhancement of its existing character.
0023	The Environment Agency	Lutra House Po Box 519 Preston	Raises concerns about drainage issues relating to the M55 Hub development. Complete evidence base is necessary prior to preparation of the submission draft document which needs to include a Surface Water Management Plan and Water Cycle Study.	The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.

Resp No	Name/Company	Address	Comment	Council Response
			Evidence is also required from the Water Company to understand potential pressures of further development on infrastructure that is already at capacity and identify appropriate attenuation measures.	Drainage issues will be addressed in the Infrastructure and Delivery Plan. More detailed assessments have been undertaken through the Water Cycle Study, together with ongoing modelling work being carried out United Utilities. This will identify necessary measures required to be undertaken to support the future level of development now proposed in the South Blackpool to, reduce the volume of surface water discharged into the system and reduce the risk of spills to the Irish Sea adversely impacting on bathing water quality.
0023	The Environment Agency	Lutra House PO Box 519 Preston	This area has a diverse range of legally protected and UK BAP species and habitats including water voles. In addition to providing a detailed drainage strategy, the protection of habitats and species within the proposed development will be required to ensure the biodiversity levels are protected and enhanced. It will need to be demonstrated that any increase in surface water does not negatively impact on the habitats present. In particular the drainage ditches which are habitat for species such as water voles and great crested newts. Developers should be aware that detailed designs for developments should aim to retain habitat and increase habitat where possible. Habitat fragmentation is not	<p>The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>Policy CS27 of the Revised Preferred Option requires the neighbourhood planning process to conserve and enhance existing natural features and habitats.</p>

Resp No	Name/Company	Address	Comment	Council Response
			acceptable under Planning Policy Statement 9 and Section 40 of the NERC Act.	
0023	The Environment Agency	Lutra House Po Box 519 Preston	Identify that whilst the policy encouraged SUDS, it still needs to be demonstrated that surface water from the new development can be properly dealt with, without causing or exacerbating problems downstream of the development.	Policy CS9 of the Revised Preferred Option deals with this issue.
0025	Mr John Ashworth	Runnell Cottage Chapel Road Blackpool	Supportive of the redevelopment of Marton Moss providing done in a way that complements its existing character the area.	Support noted.
0027	Mrs E R Ashworth	Runnell Cottage Chapel Road Blackpool	Supports the sensitive and original approach to the development of Marton Moss.	Support noted.
Policy M6: Extension to the South Blackpool Green Belt				
0011	Blackpool Airport	Squires Gate Lane Blackpool	The proposals for green belt should be undertaken considering the wider issues in relation to the role of greenbelt as the majority fall within the Fylde Borough boundary. Decision on Policy M6 cannot be made in the absence of the advancement of Fylde's Core Strategy.	In the context of the reduced housing focus, the public consultation response, and issues raised related to the proposed Green Belt, this approach is no longer pursued in the Revised Preferred Option.
0013	Blackpool LSP Environment Sub-Group	Lutra House Dodd Way Walton Summit Preston	Support the proposal to extend the green belt to the South of Blackpool under Policy M6.	In the context of the reduced housing focus, the public consultation response, and issues raised related to the proposed Green Belt, this approach is no longer pursued in the Revised Preferred Option.
0018	Kensington	94 Park View Road	Policy is objected to. The green belt	In the context of the reduced housing focus, the

Resp No	Name/Company	Address	Comment	Council Response
	Developments Ltd	Lytham	amendment should form part of an overall review of the green belt around Blackpool. Such an amendment is contrary to the advice contained in PPG2	public consultation response, and issues raised related to the proposed Green Belt, this approach is no longer pursued in the Revised Preferred Option.
0057	Government Office North West	City Tower Piccadilly Plaza Manchester	Careful consideration should be given to the policy's permanence. Where would future development in Blackpool, post 2026, be provided?	In the context of the reduced housing focus, the consultation response, and issues raised relating to the proposed Green Belt, this approach is no longer pursued in the Revised Preferred Option.
Policy M7: M55 Hub Transport and Connectivity				
0020	Lancashire County Council	County Hall Po Box 100 Preston	Provision of public transport is a critical element within the M55 Hub proposals. This policy is welcomed; however consideration should be given as to how the proposals will be taken forward as the proposal develops, possibly through the proposed joint SPD or as part of an infrastructure plan. Links from the M55 hub to Kirkham station to provide connections to Preston should be considered.	The Council is no longer proposing housing development on Marton Moss. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	The Agency is particularly supportive of this policy and the provision of a comprehensive transport improvement strategy for the M55 Hub. The proposals to optimise pedestrian and cycle connectivity between homes and employment are particularly supported. In respect of the principle of extension of bus routes and services, without the benefit of having seen any of the	Comment noted. The Council is no longer proposing housing development on Marton Moss/M55 Hub. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy

Resp No	Name/Company	Address	Comment	Council Response
			<p>modelling work (or its outcomes), the Agency is of the opinion that the scale of development being proposed at the Hub would warrant this policy to be strengthened such that new bus services of a high quality, rather than extended services, are referenced.</p> <p>With regards to the provision of a Park and Ride facility within the Hub, the Agency recognises the benefits this could have towards reducing congestion and car usage within the Borough particularly from visitors however, it could potentially have implications for the SRN. Further, consultation regarding the requirements and potential impact of a Park and Ride facility in this location, would be welcomed by the Agency as and when proposals are developed.</p>	<p>CS27 of the Revised Preferred Option.</p> <p>The need to promote sustainable patterns of travel for new residents in conjunction with the lower levels of proposed development at Whyndyke and Moss House Road is fully recognised in the Core Strategy.</p> <p>Policy SC28 'South Blackpool Transport and Connectivity' identifies a priority to 'creating direct rapid transport connections' with town centres. The viability and deliverability of such improvements will significantly depend on the scale of any wider proposed development which comes forward to support such provision. Generally, the viable improvement of services will be maximised by extending routes/ improving frequencies of existing services.</p>
0044	Sustrans	St Pauls Centre Hightown Crewe	Highlight that it will be challenging to make the M55 Hub sustainable in travel terms due to its location.	The Council is no longer proposing housing development on Marton Moss. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.

Chapter 7: Balanced, Healthy and Greener Blackpool Council

Resp No	Name/Company	Address	Comment	Council Response
Policy G1: Neighbourhood Regeneration				
0001	Rashmi Pandav Blackpool Congregation of Jehovah's Witnesses	9 Lowthorpe Crescent Preston	<p>Suggests paragraph 1 would be enhanced by adding "faiths", thereby reading:</p> <p>"A balanced and healthy community should include a mix of age groups, incomes, faiths and lifestyles in a safe and clean environment, with a full range of community facilities available to all."</p> <p>This would conform to and be in the spirit of "Diversity and Equality in Planning", where page 11 paragraph 1 states "Planning should aim to improve the lives of the widest cross section of society. Society today is made up of diverse individuals of varying faiths"</p>	A mix of age groups, incomes, and lifestyles are seen as an essential part of a balanced and healthy community. While it is understood that a mix of faiths can further enrich communities, it is not essential. The policy and indeed the Core Strategy as a whole are focused on securing a better quality of life for residents for all sections of Blackpool's community, irrespective of faith and other diversities.
0024	Hay Hill Ltd	18-22 Wigmore Street London	Concerned that the Council's proposals must be viable and realistic having regards to the current and foreseeable economic reality.	Comment noted.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	The Agency is supportive of this policy particularly with regards to permitting development and investment which provides easy access to jobs, shops and transport services and reduces the adverse traffic impacts resulting from development.	Comment noted.

Resp No	Name/Company	Address	Comment	Council Response
Policy G2: Town-wide Shopping and Community Facilities				
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	The Agency is supportive of this policy and the focus for providing major retail and community facilities within the town centre. The Agency particularly welcomes that proposals for new facilities will have to be readily accessible by sustainable transport modes.	Comment noted.
0037	Muse Developments Ltd		Supports this policy as it includes Talbot Gateway within the Town Centre Boundary.	Comment noted.
0046	Wyre Borough Council	Civic Centre Breck Road Poulton-le Fylde	<p>The second bullet of the policy makes reference to the Council's hierarchy of town, district and local centres. Whilst the district centres are listed in the policy, they contradict those shown on the key diagram on page 25 (Red Bank Road, South Shore and Waterloo Road are inconsistent).</p> <p>There is no indication in the Core Strategy of what the local centres are or what up to date evidence base has been used to establish the centre hierarchy. These matters need to be rectified.</p>	<p>The key diagram will be amended consistent with the Core Strategy retail policy (i.e. Bispham and South Shore).</p> <p>Policy G2 – now CS4 will supersede the currently saved Policies BH11 and BH12 of the Blackpool Local Plan, and set out the Council's overall approach to the future provision of town-wide shopping and facilities. The local and district centre boundaries will be re-assessed through the Site Allocations and Development Management DPD.</p> <p>The expanded Town Centre strategic site boundary is shown in the Revised Preferred Option and on</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>The Preferred Options document does not give an indication of the overall amount of retail floor space that should be provided, which is important given the removal of the needs test for applications by PPS4. It may be most appropriate to incorporate a flexible statement indicating that a certain amount of floor space will be provided by say 2017, as evidenced from the 2008 Fylde Coast Shopping Study, which will subsequently be reviewed and updated.</p> <p>It would also be appropriate to cross refer to Policies R5: Blackpool Town Centre Strategy and M4: New</p>	<p>the Key Diagram. The district centres are also shown on the Key Diagram. The Core Strategy maintains the hierarchy of District and Local Centres in Saved Policies BH13 and BH14 of the Blackpool Local Plan, as defined on the Proposals Map.</p> <p>The saved policies provide an appropriate criteria based policy framework which seeks to safeguard and enhance the role of local shopping centres. The detailed review and definition of local centres is not appropriate in the Core Strategy, but further reference will be made in the Policy and supporting text to the range of local centres.</p> <p>Reference is made in the Revised Preferred Option to the latest Fylde Coast Retail Study which reviews and affirms the hierarchy identified in the Blackpool Core Strategy and sets out the latest findings and conclusions on capacity. .</p> <p>Comment noted.</p>

Resp No	Name/Company	Address	Comment	Council Response
			Neighbourhood Development Community Infrastructure as they would also benefit from reference to floor space figures.	
0050	The Noble Organisation	1a Dukesway Court Team Valley Trading Estate Gateshead	The supporting text to the policy refers to leisure activities requiring a sequential approach as it is a type of activity that attracts a lot of visitors. The list within the policy itself therefore needs to include leisure facilities.	The Revised Preferred Option now includes a specific Leisure and Business Tourism policy.
0057	Government Office North West	City Tower Piccadilly Plaza Manchester	The Policy refers to the Council's hierarchy of Town Centre, District and Local Centres, but only sets out the main district centres. The Council's hierarchy should be defined in the Publication version of the Core Strategy.	Blackpool's hierarchy of Town Centre, District and Local Centres will be set out in the Policy. The expanded Town Centre strategic site boundary is shown in Figure 4 of the revised Core Strategy and on the Key Diagram. The district centres are also shown on the Key Diagram. The Core Strategy maintains the hierarchy of District and Local Centres in Saved Policies BH13 and BH14 of the Blackpool Local Plan, as defined on the Proposals Map. The saved policies provide a criteria based policy framework which seeks to safeguard and enhance the role of local shopping centres. The detailed definition of local centres is not appropriate in the Core Strategy, but further reference will be made in the Policy and supporting text to the range of local centres.
Policy G3: Health and Education				
0008	Ms Angelia Hinds	21 Moss House Road Blackpool	Questions whether there are alternative sites for a new secondary school if the	The level of development proposed in South Blackpool in the Revised Preferred Option is

Resp No	Name/Company	Address	Comment	Council Response
			school is not built in Fylde.	significantly reduced from the Preferred Option and is unlikely to require new high school provision..
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	The Agency is supportive of providing new facilities to support new and existing communities which currently lack sufficient provisions, particularly where it can help to reduce the need to travel	Comment noted.
0031	Sport England	Building 3 Universal Square Devonshire Street Manchester	<p>Given recent announcements by the Coalition Government with regards to BSF, this section would benefit from revision.</p> <p>Suggests the policy be amended to support dual / shared use of school facilities (including sports facilities). Opening up school sites for wider community use can increase accessibility to facilities, and also contribute towards sustainable development objectives by making more intensive and efficient use of resources. In addition, using school sites in this way can benefit young people by strengthening the links between their involvement in sport during school time and continued participation in their own time.</p> <p>State there is potential for new primary</p>	<p>The DfeS Building Schools for the Future programme remains appropriately referred to in the Policy - school rebuilding is continuing, even though the full scale of the programme has been curtailed. Amendments made to policy and supporting text to reflect these points.</p> <p>Amendments made to policy and supporting text in the Revised Preferred Option.</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>care facilities to incorporate other community facilities including sport and recreation facilities. Indeed the text on page 121 refers to such a centre. The policy could be amended by seeking to support such co-located / integrated uses. Such facilities can help contribute to more active lifestyles, and also be used directly for physical activity referrals by healthcare professionals. There are opportunities to use the findings of a PPG17 audit and needs assessment to help shape the nature and location of such facilities. Likewise, there are opportunities for more efficient use of land and potential for reducing journeys by combining facilities on accessible sites.</p>	
Policy G4: Housing Mix, Density and Standards				
0018	Kensington Developments Ltd	94 Park View Road Lytham	Consider that the introduction of imposed housing mixes is arbitrary. It should be for the market to decide the exact mix of house types.	<p>This policy (now CS12 in the Revised Preferred Option) continues to provide substantial flexibility for the market to decide the mix of house types. Major flexibility exists on all sites below 2 hectares. The mix on larger sites reflects the need to better balance Blackpool's overall housing offer, informed by the findings of the Fylde Coast Strategic Housing Market Assessment, and Blackpool Housing Monitoring Reports.</p> <p>National guidance sets out that the proposed mix on larger sites should reflect the requirements for</p>

Resp No	Name/Company	Address	Comment	Council Response
				<p>different types and size of households, and should contribute towards the required mix on smaller sites.</p> <p>Reflecting the concerns raised, amendment has been made to the proposed mix on larger sites to allow some increased flexibility for market variation.</p>
0020	Lancashire County Council	County Hall PO Box 100 Preston	Fully support this policy.	Comment noted.
0024	Hay Hill Ltd	18-22 Wigmore Street London	<p>Housing density figures are now out of date following the publication of the Amended PPS3 in June 2010.</p> <p>Comment that the Housing Mix policy is overly prescriptive and undeliverable particularly if it is applied on a case by case basis. Needs to be consistent with the Housing Needs survey and re-evaluated in light of the revocation of the RSS and amended PPS3.</p>	<p>The policy has been amended to reflect the change in national policy. It does not set out a prescriptive minimum density, but aims to achieve a net density above 30 dwellings per hectare, while fully recognising and providing flexibility, particularly on smaller sites, where location, design and site characteristics considerations may outweigh density considerations.</p> <p>The policy continues to provide substantial flexibility for the market to decide the mix of house types. Major flexibility exists on all sites below 2 hectares. The mix on larger sites reflects the need to better balance Blackpool's overall housing offer, informed by the findings of the Fylde Coast Strategic Housing Market Assessment, and Blackpool Housing Monitoring Reports.</p> <p>National guidance sets out that the proposed mix on larger sites should reflect the requirements for</p>

Resp No	Name/Company	Address	Comment	Council Response
				<p>different types and size of households, and should contribute towards the required mix on smaller sites.</p> <p>Reflecting the concerns raised, amendment has been made to the proposed mix on larger sites to allow some increased flexibility for market variation.</p>
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	The Agency is generally supportive of focusing higher density housing provision within the main centres which provide the most sustainably accessible location and along key public transport corridors where they are well served by regular and efficient public transport services.	Comment noted.
0057	Government Office North West	City Tower Piccadilly Plaza Manchester	Justification needs to be provided for the house size (i.e. numbers of bedrooms) requirements which are out in this Policy.	The mix on sites reflects the need to better balance Blackpool's overall housing offer, informed by the findings of the Fylde Coast Strategic Housing Market Assessment, and Blackpool Housing Monitoring Reports.
Policy G5: Affordable and Supported Needs Housing				
0008	Ms Angelia Hinds	21 Moss House Road Blackpool	Comments that the strategy should commit to provide the necessary contributions towards affordable housing otherwise regeneration of the inner town will not occur.	It is a priority for the Council to ensure that there is an adequate supply of good quality affordable housing across the Borough. The Affordable Housing Policy and a supporting Supplementary Planning Document aims to maximise affordable housing provision to support Blackpool's regeneration objectives.
0018	Kensington Developments	94 Park View Road Lytham	Accept that obligation to provide an element of affordable housing however there is no basis put forward for the 30%	The Fylde Coast Strategic Housing Market Assessment (SHMA) supports a 30% affordable housing provision in Blackpool on sites of 15

Resp No	Name/Company	Address	Comment	Council Response
			<p>minimum.</p> <p>Insufficient recognition of the importance of the viability of developments is given in this policy. Provision of affordable housing should not prejudice the deliverability of schemes and should be explicitly stated in the justification of the policy.</p>	<p>dwellings or more as well as a contribution to off-site provision on smaller developments. An Affordable Housing Viability Appraisal has been undertaken in line with the requirements of national guidance, which demonstrates this is viable and will be made available as a public document. The appropriate size, type and tenure of affordable housing to be provided will be determined by a number of factors, which recognises the need to have direct regard to the economic viability of provision. An emerging Affordable Housing Supplementary Planning Document will provide more detailed guidance.</p>
0038	Natural England	Hornbeam House Electra Way Crewe Business Park Crewe	<p>Would welcome inclusion of a standard for access to green space in line with our own Natural England Accessible Greenspace Standards.</p> <p>Suggests inclusion of links to standards for Sustainable Drainage, even if in the supporting text.</p>	<p>Reference to the Natural England Accessible Greenspace Standards is made in the supporting text to policy CS6 of the Revised Preferred Option</p> <p>Policy S7 (re-numbered CS9 in the Revised Preferred Option) requires the Council to ensure that development proposals minimise flood risk and incorporate appropriate sustainable drainage systems and water retention methods.</p>
0046	Wyre Borough Council	Civic Centre Breck Road Poulton-le-Fylde	<p>Distinguishing between requirements for social rented and intermediate housing by area is commendable, subject to this approach being clearly evidenced.</p>	<p>Point noted. The approach is supported by the SHMA and is further evidenced by the assessment undertaken to inform an emerging Affordable Housing Supplementary Planning Document.</p>
0057	Government office North West	City Tower Piccadilly Plaza Manchester	<p>States this Policy needs to set an overall (target for the amount of affordable housing to be provided, in accordance with PPS3 para 29.</p>	<p>The SHMA update is due to be published in Summer 2012 and this will provide an overall affordable housing target for Blackpool which will be detailed in the Pre-Submission Policy.</p>

Resp No	Name/Company	Address	Comment	Council Response
			The policy will also need to justify the 30% target for affordable housing. Its economic viability will need to be supported by a viability assessment, in the light of the Blyth Valley case. Notes that an SPD is being prepared and that it will include a detailed basis for an informed assessment of the economic viability of the targets for affordable housing and the thresholds set out in the Policy. Logically, the economic viability assessment should inform the Policy's target and thresholds; presumably the timing of the SPD/assessment will enable this to happen by the Reg 27 Publication stage.	An Affordable Housing Viability Appraisal has been undertaken and will be published as an evidence base document; this has informed the Core Strategy Policy and the emerging Affordable Housing Supplementary Planning Document.
Policy G6: Gypsy and Travellers, and Travelling Showpeople				
0046	Wyre Borough Council	Civic Centre Breck Road Poulton-le-Fylde	The policy requires amendment to be consistent with national advice. Paragraph 31 of Circular 1/2006 Planning for Gypsy and Traveller Caravan Sites, states: "The core strategy should set out criteria for the location of gypsy and traveller sites which will be used to guide the allocation of sites in the relevant DPD. These criteria will also be used to meet unexpected demand."	The RSS Partial Review draft policy was based on a comprehensive assessment of need across the North West. The findings of the Panel after the Examination in Public confirmed and supported this position. Reflecting this, Policy G6 did not set out any requirement for additional provision of Gypsy and Traveller sites in Blackpool. Following the Government's proposed cancellation of Regional Strategies, the introduction of the Localism Act, and the new national planning policy for traveller sites, the policy has been amended, and replaced by a new criteria based policy which reflects these changes appropriate to Blackpool's

Resp No	Name/Company	Address	Comment	Council Response
0047	Lancashire Wildlife Trust	The Barn Berkeley Drive Preston	Supports the recommended change in wording to Policy G6 outlined in the Habitats Regulations Screening Assessment document produced by Bowland Ecology (March 2010) as part of the Council's Evidence Base.	specific circumstances. Following the Government's proposed cancellation of Regional Strategies, the introduction of the Localism Act, and the new national planning policy for traveller sites, the policy has been amended, and replaced by a new criteria based policy which reflects these changes appropriate to Blackpool's specific circumstances.
0057	Government Office North West	City Tower Piccadilly Plaza Manchester	In accordance with Circular 01/2006, the Core Strategy should set out criteria, for the location of gypsy and traveller sites, which will be used to guide the allocation of sites in the relevant DPD. These criteria will also be used to meet unexpected demand.	The RSS Partial Review draft policy was based on a comprehensive assessment of need across the North West. The findings of the Panel after the Examination in Public confirmed and supported this position. Reflecting this, Policy G6 did not set out any requirement for additional provision of Gypsy and Traveller sites in Blackpool. Following the Government's proposed cancellation of Regional Strategies, the introduction of the Localism Act, and the new national planning policy for traveller sites, the policy has been amended, and replaced by a new criteria based policy which reflects these changes appropriate to Blackpool's specific circumstances
0060	Fylde Borough Council	Town Hall Lytham St Annes	Suggest that the Preferred Option fails to address the provision of additional Gypsy and Traveller Accommodation. Following the revocation of RSS, Central Government has advised that local planning authorities may wish to use existing GTAAs as a starting point if they	The RSS Partial Review draft policy was itself based on the GTAA comprehensive assessment of need across the North West. The findings of the RSS Partial Review Examination in Public confirmed and supported Policy G6 which did not set out any requirement for additional provision of Gypsy and Traveller sites in Blackpool. This remains a material part of the evidence base, and the specific

Resp No	Name/Company	Address	Comment	Council Response
			wish to review levels of provision. You will also be aware that Fylde Borough Council lodged an objection to the levels of provision set out in the partial review of RSSNW which sought to redistribute the need established in the GTAA across the wider Fylde peninsula.	circumstances in Blackpool which justified this approach also remain the same. Following the Government's proposed cancellation of Regional Strategies, the introduction of the Localism Act, and the new national planning policy for traveller sites, the policy has been amended, and replaced by a new criteria based policy which reflects these changes appropriate to Blackpool's specific circumstances.
Policy G7: Protected Green Space				
0008	Ms Angelia Hinds	21 Moss House Road Blackpool	The development of the Moss goes against this policy and will go no way to safeguarding the remaining areas of open land and attractive landscaping which exists in the Borough.	As stated the requirement is to balance the requirement for new development with the need to protect nature conservation, greenspace or other environmental interests. The Council is no longer pursuing the level of development on the Moss that was set out in the Preferred Option. The emphasis in the Revised Preferred Option is on protection and enhancement delivered through a neighbourhood planning approach.
0023	Environment Agency	Lutra House Po Box 519 Preston	Support of this policy. However wildlife provisions should be incorporated such as wildlife corridors and 'stepping stones' such as ponds. Green corridors will link sites together allowing connectivity and species movement. Suggest the bullet point 'Other urban green space' be changed to 'Other urban green space and wildlife corridors and habitat'.	Part 1 (d) of Revised Core Strategy policy CS6 takes this into account.
0031	Sport England	Building 3	The objective of policy G7 strongly	Part 2 of Revised Core Strategy policy CS6 takes

Resp No	Name/Company	Address	Comment	Council Response
		<p>Universal Square Devonshire Street Manchester</p>	<p>supported. However, it is unclear by what mechanism improvements would be secured. There is, for example, no reference to developer contributions being sought for such improvements.</p> <p>The importance of an up to date PPG17 compliant audit and assessment, supported or incorporating a playing pitch assessment / strategy should also be emphasised again as without such evidence it will not be possible to assess the appropriate quality, quantity and accessibility of such provision.</p> <p>Expresses that there is a degree of confusion between the relation of policy G7 and the existing Local Plan policies. Appendix C shows Local Plan policies BH5 and BH7 as being saved (i.e. not superseded), yet the role of these policies would appear to be to protect open spaces, playing fields and sports grounds like core strategy policy G7.</p> <p>Furthermore, Appendix C shows policy G7 as replacing Local Plan Policy BH6. Policy BH6, however, allocates areas for open space. Unclear how policy G7,</p>	<p>this into account. Also policy CS10 'Planning Obligations' refers to play areas, parks and spaces, ecology and nature conservation and sports facilities.</p> <p>The Blackpool Open Space, Sport and Recreation Audit and Position Statement (2009) sets out the quantum, quality, and accessibility of recreation open space provision across Blackpool. The audit provides a basis for assessing current and future need and recognises the priority to improve, enhance and remodel existing parks and open spaces.</p> <p>Policy G7 (now CS6) provides an overarching Core Strategy statement of the Council's intent and commitment to protect, improve and enhance the quality and value of existing greenspace in Blackpool. There is no conflict between saved Local Plan policies and Policy CS6. Policy CS6 does not replace Policies BH5 and BH7 which continue to provide further detail as to the Council's specific approach to its consideration of development proposals for existing public open spaces, playing fields and sports grounds.</p> <p>Local Plan policy BH6 is a site specific policy which will no longer be relevant to save as some sites have been implemented (and thus relevantly replaced by Revised Core Strategy policy CS6 (was</p>

Resp No	Name/Company	Address	Comment	Council Response
			which protects space, can replace a policy which allocates open space.	G7) which protects existing space) or are no longer being pursued. The Highfield Road/ Yeadon Way site (Policy BH6) is a council owned site and has not been implemented. Policies G7 and G8 have been combined into a single policy on 'Green Infrastructure' – CS6 in the revised Preferred Option.
0038	Natural England	Hornbeam House Electra Way Crewe Business Park Crewe	Welcomes this strong policy to protect and improve key green spaces within the borough. We would appreciate these sites being identified on any key diagrams.	Support noted. Existing green spaces are not a focus of the Core Strategy. While the importance of these sites was fully recognised in Policy G7 (now CS6), in the Blackpool context these sites are too numerous and detailed to be shown on the Key Diagram (the strategic focus of which needs to remain on the twin Core Strategy priorities of inner area regeneration and supporting South Blackpool growth). Reflecting its importance as the town's main park, Stanley Park will be identified on the Key Diagram.
0047	Lancashire Wildlife Trust	The Barn Berkeley Drive Preston	Would like to see clarification of the term 'sites of local nature conservation interest'. Perhaps distinguishing between statutory (e.g. SSSI) and non-statutory sites (Biological and Geological Heritage Sites), and including Local Nature Reserves (LNR) such as Marton Mere.	Part 3 of Revised Preferred Option policy CS6 deals with this.

Policy G8: Green Infrastructure

Resp No	Name/Company	Address	Comment	Council Response
0013	Blackpool LSP Environment Sub-Group	Lutra House Dodd Way Walton Summit Preston	Supportive of this policy.	Comment noted.
0015	Bourne Leisure Ltd		Supportive of Policy G8, however the need to protect designated areas should be balanced with economic considerations and benefits. Policies on Green Infrastructure and their supporting text should recognise there is scope for appropriate development in designated sites such as nature reserves provided that commensurate mitigation measures are impacted to minimise both direct and indirect impacts.	<p>Comment noted. The policy appropriately sets out the overarching priority for the protection, enhancement and improvement of Green Infrastructure as an integrated component of Blackpool's regeneration and of future major developments.</p> <p>National Planning Policy and existing saved policies of the Blackpool Local Plan (Policies NE4 and NE5) will continue to provide further detail and set out the need for mitigation. However, this is only in exceptional circumstances and specifically it is not appropriate to generally balance economic considerations and benefits on the minority of lands which are specifically identified as designated sites.</p>
0023	Environment Agency	Lutra House PO Box 519 Preston	Supports this policy	Comment noted.
0031	Sport England	Building 3 Universal Square Devonshire Street Manchester	This policy is supported in so far as it seeks to protect, enhance and increase provision of Green Infrastructure. However, it is somewhat unclear as to whether the protection element of this policy duplicates Policy G7. That is to say do all Green Spaces constitute Green Infrastructure? If so, there is perhaps a	The emphasis of Policy G7 is on safeguarding existing greenspace - whereas the Policy G8 priority focus is on new provision, as well as the improvement and enhancement of existing parks and spaces. Whereas there is a distinction in emphasis between safeguarding and conservation, rather than a more active focus on recreation and green infrastructure development, it is accepted

Resp No	Name/Company	Address	Comment	Council Response
			<p>question as to whether policy G7 is needed.</p> <p>Further detail is needed on how the policy would operate. Specifically, the text of the policy itself simply states that “... enhancement and increased provision of Green Infrastructure will be promoted and pursued as an integral component of ... future major development”. Greater clarity would result from indicating that this would be achieved through on-site provision, off-site provision, financial contributions, a mixture of approaches etc.</p> <p>The final bullet point of the policy text seeks an expansion of community use of indoor and outdoor school recreation facilities. Whilst Sport England supports this policy aim, it appears to sit awkwardly under policy G8. That is to say indoor facilities, such as sports halls, would not be regarded by some as Green Infrastructure. Policy G3 might be a more appropriate location for this policy objective. I would also recommend that “recreation facilities” is amended to read “sport and recreation facilities”.</p>	<p>there is overlap. Policies G7 and G8 have now been combined into a single policy on ‘Green Infrastructure’ in the Revised Preferred Option of the Plan.</p> <p>Part of Revised Preferred Option policy CS2 deals with this issue.</p> <p>Revised Preferred Option policy CS14 ‘Health and Education’ now deals with this issue.</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>The text supporting the policy also refers to a Blackpool Open Space, Sport and Recreation 2009 Audit and Position Statement. This document is not available on the Core Strategy Evidence Base web page, though. Furthermore, the name implies that only an audit of provision has taken place and not an assessment of current and future need.</p> <p>The adequacy of existing and future provision (in terms of quantity, quality and accessibility) cannot be assessed in the absence of need.</p>	<p>The 2009 Audit will be made available on the Council's Core Strategy Evidence Base webpage in advance of the next stage public consultation. The detailed audit, as stated, sets out the quantum, quality, and accessibility of recreation open space provision across Blackpool, and is accepted provides a basis for but does not comprise a full assessment of current and future need in accordance with the NPPF. Policy on Green Infrastructure is appropriately informed by this detailed audit.</p> <p>The focus of the key proposals of the Core Strategy on inner area regeneration and supporting development in south Blackpool is not compromised by these limitations. The requirement is for the Core Strategy to be supported by an appropriate evidence base. The insufficiencies of green infrastructure within the inner areas is extreme and obvious, as are the limitations to address it in terms of available sites, and fully support the policy approach which is reflected throughout the document, and specifically in policy CS6 of the Revised Preferred Option.</p>
0038	Natural England	Hornbeam House Electra Way Crewe Business Park Crewe	<p>Generally supportive of this policy.</p> <p>We would like to see the supporting text make links between GI and climate change</p>	Revised Preferred Option policy CS6 now deals with this issue.

Resp No	Name/Company	Address	Comment	Council Response
0044	Sustrans	St Pauls Centre Hightown Crewe	Support this policy. Would like to see consideration made to providing greenways for shared pedestrian/cycle use as well as enhancing the walking network.	Part 1(d) of Revised Preferred Option policy CS6 now deals with this issue.
0047	Lancashire Wildlife Trust	The Barn Berkeley Drive Preston	Welcomes the priority afforded to Green Infrastructure. State that it is important that North - South linkages are developed and maintained, particularly with regards to coastal habitats. Such networks should be protected from development, and, where possible, strengthened by or integrated within it.	Comment noted.
Policy G9: Energy Requirements of New Development				
0013	Blackpool LSP Environment Sub-Group	Lutra House Dodd Way Walton Summit Preston	Supportive of this policy	Comment noted.
0018	Kensington Developments	94 Park View Road Lytham	The policy is aspirational and not measurable.	Policy G9 (now CS9) requires new or replacement buildings to achieve a 15% reduction in CO2 emissions <i>after</i> Building Regulations (Part L) compliance, which can be measured through the completion of design and as-built Building Control Compliance documentation clearly showing the Target Emission Rate (TER) and Dwelling Emission Rate (DER) /Building Emission Rate (BER).
0020	Lancashire County Council	County Hall PO Box 100 Preston	Supportive of this policy. The SA summary for the M55 hub	Comment noted. The Council is no longer pursuing development at

Resp No	Name/Company	Address	Comment	Council Response
			proposal argues that given its urban edge location its sustainability is dependant on how rigorously sustainable design solutions are implemented. This could be reflected in the above policy through the use of lower thresholds and targets.	the M55 hub. However, the thresholds identified were based on recommendations provided within the AECOM Climate Change and Renewable Energy Study (2010) which assessed the local circumstances. The scope of thresholds identified in this policy apply to all new development across the borough.
0023	Environment Agency	Lutra House PO Box 519 Preston	Supports this policy	Comment noted.
0035	Blackpool, Fylde and Wyre Economic Development Company		Fully support the aspiration of this policy; however the requirement for additional 15% reduction in CO2 emissions (beyond Building Regs compliance) in all new and replacement buildings could potentially stifle development investment in the immediate future. Suggest that some flexibility is provided to enable otherwise viable development whilst maximising energy performance.	As identified in the supporting text relating to policies G9, G10 and G11 (now CS9), exceptionally where a 15% CO2 reduction cannot cost effectively be achieved on site it may be accepted for a developer to make a commuted sum payment into to a carbon buyout fund for off-site CO2 reduction and energy provision.
0038	Natural England	Hornbeam House Electra Way Crewe Business Park Crewe	Supports this policy	Comment noted.
0057	Government Office North West	City Tower Piccadilly Plaza Manchester	Paragraph 26 of the Climate Change Supplement to PPS1 states that LPAs should have an evidence-based understanding of the local feasibility and potential for renewable and low-carbon technologies, including micro generation,	Comments noted and in line with the recommendations of the AECOM Climate Change and Renewable Energy Study, further clarification is provided in Revised Core Strategy policy CS9 in relation to the 15% reduction in CO ₂ emissions, with specific reference made to energy efficiency

Resp No	Name/Company	Address	Comment	Council Response
			<p>to supply new development in their area, and that this may require them to make their own assessments.</p> <p>Drawing from this evidence base, LPAs should set out a target percentage of the energy to be used in new development to come from decentralised and renewable or low-carbon energy sources where it is viable. Paragraph 33 of the Supplement states that any policy relating to local requirements should be set out in a DPD.</p>	<p>measures, and the incorporation of on-site low carbon and renewable technologies and directly connected heat.</p>
Policy G10: Sustainable Design, Layout and Construction				
0013	Blackpool LSP Environment Sub-Group	Lutra House Dodd Way Walton Summit Preston	<p>Requirement for Code level 3 not aspirational enough and would prefer to see Code level 4 as a minimum.</p> <p>Acknowledge commitment to produce an SPD but would like scope of the document to be extended to include</p>	<p>The PPS1 Supplement allows local authorities to require levels of building sustainability in advance of those set nationally where local circumstances warrant them. Where local requirements go beyond national requirements, including Building Regulations, the evidence base must justify this based on local circumstances. The requirement for Code Level 3 is based on the recommendation of the AECOM Climate Change and Renewable Energy study which is based on an assessment of the local circumstances in Blackpool. To require code level 4, a further financial and technical feasibility assessment would be required.</p> <p>In terms of water efficiency, from April 2010 Building Regulations (Part G) requires that new dwellings limit potential consumption of</p>

Resp No	Name/Company	Address	Comment	Council Response
			measures to improve water efficiency.	wholesome water to 125 litres per person per day. In addition to this, policy C9S now refers to measures to improve water efficiency.
0020	Lancashire County Council	County Hall Po Box 100 Preston	Supportive of this policy. The SA summary for the M55 hub proposal argues that given its urban edge location its sustainability is dependant on how rigorously sustainable design solutions are implemented. This could be reflected in the above policy through the use of lower thresholds and targets.	Comment noted. This level of development at the M55 hub is no longer being pursued by the Council with the emphasis now being on supporting the retention and enhancement of Marton Moss.
0023	Environment Agency	Lutra House Po Box 519 Preston	Supports this policy	Comment noted
0038	Natural England	Hornbeam House Electra Way Crewe Business Park Crewe	Supports this policy.	Comment noted
Policy G11: Strategic Site and Energy Requirements				
0020	Lancashire County Council	County Hall Po Box 100 Preston	Supportive of this policy. The SA summary for the M55 hub proposal argues that given its urban edge location its sustainability is dependant on how rigorously sustainable design solutions are implemented. This could be reflected in the above policy through the use of lower thresholds and targets.	Comment noted. This level of development is no longer being pursued by the Council with the emphasis now being on supporting the retention and enhancement of Marton Moss. The scope of thresholds identified in G10 applies to all new development across the borough.
0038	Natural England	Hornbeam House Electra Way	Supports this policy but would like to see them cross referenced to earlier policies	Revised Core Strategy CS6 'Green Infrastructure' makes cross reference to Climate Change

Resp No	Name/Company	Address	Comment	Council Response
		Crewe Business Park Crewe	/ supporting text in the document. Would welcome references in G11 to landscape character and quality; and biodiversity considerations being particularly relevant in scenarios considering such energy requirements.	Detailed criteria for the development of decentralised, renewable and low carbon energy will be developed as part of the Site Allocations and Development Management Development Plan Document.
0047	Lancashire Wildlife Trust	The Barn Berkeley Drive Preston	Supports the recommended change in wording to Policy G11 in relation to Wind Turbines as outlined in the Habitats Regulations Screening Assessment document produced by Bowland Ecology (March 2010) as part of the Council's Evidence Base.	Part 3 of Revised Preferred Option policy CS6 reflects this issue.

Chapter 8: Delivering the Vision

Resp No	Name/Company	Address	Comment	Council Response
Policy PO1: Planning Obligations				
0015	Bourne Leisure Ltd		Bourne Leisure considers that this supporting text should distinguish between the level of charges for different land uses. For example Tourism land uses should be charged less as they should not have to contribute to certain infrastructure such as education.	<p>Policy PO1 set out the Council's commitment and provides the statutory planning policy basis in the Core Strategy for developments to only be permitted where the additional needs arising from developments are met.</p> <p>The Core Strategy recognises this is a priority, but it is the future detailed guidance which will determine the level of charges/ required provision for different land uses.</p>
0018	Kensington Developments	94 Park View Road Lytham	Reference to CIL is premature, given the new coalition government stated intention to abandon it. The principle of planning obligations to provide "required as opposed to desired" infrastructure is accepted.	The reference to CIL has been updated to reflect the latest position in the Revised Preferred Option.
0023	Environment Agency	Lutra House PO Box 519 Preston	Acknowledge that this policy will help delivery of new infrastructure; there still needs to be a practical solution identified to the drainage problems in the Borough.	Comment noted.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	The Agency is supportive of this policy and welcomes the use of the CIL as a mechanism for obtaining contributions from developers towards the cost of new or improved infrastructure, particularly where existing infrastructure is not sufficient to accommodate the proposed	Comment noted.

Resp No	Name/Company	Address	Comment	Council Response
0028	The Theatres Trust	22 Charing Cross Road London	development. Would like the last bullet point on P141 to read 'other community and cultural facilities' to include arts and leisure.	'Leisure and Arts' has been added as a separate bullet to the list of examples of facilities funded via planning obligations.
0031	Sport England	Building 3 Universal Square Devonshire Street Manchester	Supportive of this policy. However, states that it is not entirely clear how it will be determined if existing infrastructure etc. is already sufficient (and therefore no obligation would be needed) or how additional need arising from the development would be assessed. The text following the policy states that new detailed guidance would be produced to implement a Community Infrastructure Levy. Prior to this, the intention is to continue to use planning obligations to meet infrastructure needs. However, there is no reference to what types of development would be required to contribute, what thresholds (if any would apply), how onsite / offsite provision and / or level of contributions would be determined. Is the intention to create supplementary planning documents to address such matters?	Support noted. Prior to new detailed guidance to implement a CIL, Planning Obligations would be used, with reliance on assessing individual planning applications against Policy PO1 and supporting policies of the Plan. All developments would be required to consider their wider impacts and be supported by appropriate measures to address consequent infrastructure, services and amenity requirements. There will be continuing reliance on the Council's existing SPG11 which sets out thresholds and how contributions would be determined to support future sports and recreational provision. This guidance will be revised and updated, and CIL implementation will address these issues and wider issues arising from any development.
0052	North and Western Lancashire Chamber of Commerce	1-2 Lockheed Court Amy Johnson Way Blackpool	Suggests the range of partners involved in delivering the vision needs to be revised in light of current spending	Point noted. The Infrastructure and Delivery Plan will revise and review partners and implementation priorities of the Core Strategy.

Resp No	Name/Company	Address	Comment	Council Response
			restrictions. Budget proposals and ranking of priority activity would be helpful	
0057	Government Office North West	City Tower Piccadilly Plaza Manchester	<p>After April 2014 (or after the earlier introduction of CIL by a LPA) contributions via S106 agreements can be sought to fund relevant infrastructure, as long as they meet the tests in Reg 122 of the CIL Regulations 2010; but planning obligations should relate to a particular development, whereas CIL contributions are for general infrastructure need.</p> <p>Third and fifth paragraphs on page 141 will need to be amended.</p> <p>PINS note of July 2009, following Shelagh Bussey's advisory visit, emphasised the importance of focusing on delivery. Where delivery might be uncertain, the Core Strategy Publication (Reg 27) document will need to demonstrate flexibility and set out what contingency plans are in place.</p> <p>Also, in the third paragraph of the Policy, we recommend that you change the word "sought" to "imposed", in relation to planning conditions.</p>	<p>The Revised Preferred Option has been amended in line with the CIL Regulations 2010.</p> <p>The Core Strategy document will demonstrate appropriate flexibility and set out further details in the Infrastructure and Delivery Document and supporting evidence.</p> <p>The policy wording will be amended to refer to planning contributions and/or CIL charges being sought (rather than planning conditions) to ensure requirements are met.</p>

Other Comments

Resp No	Name/Company	Address	Comment	Council Response
Other comments				
0003	The Coal Authority	200 Lichfield Lane Berry Hill Nottinghamshire	No Specific Comment on the Core Strategy as a whole.	Comment noted.
0004	Mr Malcolm Hicks	4 Princes Road Lowestoft	Fully supportive of plans to regenerate Blackpool for the 21st Century. However, objects to any potential closure of Blackpool South Station.	Comment noted. There is no intention to close the station in the Core Strategy, which emphasises the priority to improve the south Fylde line.
0005	4NW	Wigan Investment Centre Waterside Drive Wigan	Advise that there is now no obligation to consult 4NW on Local Development Frameworks and therefore no comments to make.	Comment noted.
0008	Ms Angelia Hinds	21 Moss House Road Blackpool	No detail provided on the Council's strategy to attract employment to Blackpool.	Policy S5 of the Preferred Option set out the Council's strategic priorities for employment development and economic diversification. Much of the focus of the resort regeneration and town centre policies of the Core Strategy will strengthen employment opportunities. Further enhancement of the focus for expanded employment opportunities in south Blackpool is now included in the Revised Preferred Option.
			Although the Preferred Option states that all areas of the town should desirably be accessible to significant and accessible areas of green space, the Council is not seeking to rectify the issue.	Revised Core Strategy Policy CS6 'Green Infrastructure' sets out priorities for the provision for Green Infrastructure with the intensely built up nature of Blackpool also necessitating a focus on improving quality and accessibility of provision.
			Asks if the Core Strategy will be revised due to the abolishment of the Regional	The Revised Preferred Option fully reflects the proposed abolition of the Regional Spatial Strategy.

Resp No	Name/Company	Address	Comment	Council Response
			<p>Spatial Strategy.</p> <p>The scale of new housing that can be met in the Inner Area is limited by the level of public funding potentially available.</p> <p>Strategic sites in the resort core are critical to the delivery of a new Blackpool but are costly to deliver and can only realistically come forward if supported by substantial public funded interventions and private sector investment.</p> <p>Asks whether the Council intends to introduce Private Finance Initiatives which have been used in other areas as an alternative source of funding.</p>	<p>The extent to which the quantum of regeneration may be affected by reduced availability of public funding is recognised and acknowledged in the Core Strategy. Further market based regeneration sites may come forward in line with the pace of Blackpool's regeneration.</p> <p>There is no awareness of any intention to introduce PFI initiatives for future housing sites.</p>
0010	Mr Alan Marshall	Foxes Farm Flat 7 Fairfield Road Poulton-le-Fylde	Comments that the Delivery and Implementation Plan does not have sufficient depth to convince the reader that the policy will achieve its objectives.	A much more detailed Infrastructure and Delivery Plan is being produced alongside the Pre-Submission edition of the Core Strategy.
0012	Blackpool Holiday Trades Association	Queen Victoria Hotel 60 Station Road Blackpool	A dual strategy should be implemented to halt and reverse the decline of the Inner Neighbourhoods and not just concentrate on the strategic projects within the Town Centre.	This need for a dual focus is fully supported and reflected throughout the Core Strategy.
0013	Blackpool LSP Environment Sub-Group	Lutra House Dodd Way Walton Summit Preston	Delivery and Implementation - Note in the indicator of success for Policy S6 a reference to 'changing biodiversity of safeguarded conservation sites'. Consider that this is too vague and should be changed to a measure of	This indicator has been amended in the Revised Preferred Option to reflect the AMR Core Indicator.

Resp No	Name/Company	Address	Comment	Council Response
			success that increases the number and diversity of species across the whole of Blackpool not just in designated conservation sites.	
0015	Bourne Leisure Ltd		Supports the recognition of Blackpool as a major tourism destination. Also supports the identified challenge to "develop a unique 21st century resort offer" (page 12) but would add that a further challenge to be addressed, is the need to ensure a range of good quality tourism accommodation including Holiday Parks.	Comment noted, with the need to ensure a range of good quality tourism accommodation a clear priority of the Core Strategy. Policy CS20 of the Revised Preferred Option further reflects this need.
			Strongly supports the need for the enhancement of existing tourism accommodation and facilities, including Holiday Parks.	Comment noted.
0018	Kensington Developments	94 Park View Road Lytham	Figure 2 should include in the "Main Industrial Areas" the location of Whitehills Business Park giving a fuller picture of the existing spatial profile of the Borough and its opportunities notwithstanding its location outside of Blackpool. The principles of the Council's intentions for the M55 Hub are supported, but will be difficult to achieve without the support of Fylde BC who to date have not been unequivocal in their support. Until	The importance of Whitehills Park is recognised in the Core Strategy and specifically referred to in the supporting text. The focus of the Core Strategy as a statutory plan remains on the local authority area of Blackpool, and illustrative maps reflects this. Comment noted. The figures have been reviewed following the Government's proposed revocation of RSS housing targets and the revised figures are supported by an ongoing and updated evidence base.

Resp No	Name/Company	Address	Comment	Council Response
			that support is given, there continues to be doubt over the deliverability of the development and thus there must be questions as to whether the residential elements meet the current requirements of Government advice.	The potential for wider development of lands in Fylde remains a matter to be determined by Fylde Borough Council as part of its own evolving Core Strategy process. The revised Blackpool Core Strategy proposals are clearly focused on South Blackpool itself, as against the wider "M55 Growth Point" in the Preferred Option document.
0020	Lancashire County Council	County Hall PO Box 100 Preston	The M55 Hub Masterplan needs to be reviewed and another option brought forward if the Masterplan was significantly changed.	The Council is no longer pursuing the M55 Hub. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
0022	Network Rail		No issues. Network Rail is currently pursuing initial design discussion to improve its facility however raise concerns that the station's operation must not be compromised by the Council's desire the regenerate the wider area. The desired additions of a Tram link are understood but reserve their position to its acceptance subject to further studies.	Comment noted.
0023	Environment Agency	Lutra House Po Box 519	The Water Framework Directive is not considered in the Preferred Option.	Comment noted.

Resp No	Name/Company	Address	Comment	Council Response
		Preston	Spatial planning bodies can help deliver the Directives objectives by adopting policies that contribute to or support measures that need to be put in place to achieve 'good status'.	
0024	Hay Hill Ltd	18-22 Wigmore Street London	<p>Comment that some of the documents forming the evidence base are out of date specifically:</p> <ul style="list-style-type: none"> - the AMR, last updated Dec 09 - the SHLAA, last updated May 09 - the Visitor Accommodation Study Aug 09 <p>The draft policies have not taken into account changes to PPS4, PPS3, and PPS5.</p>	<p>The evidence base is continually being updated as appropriate and relevant to the development of the Core Strategy policies and proposals. The AMR, HMR, SHLAA have been updated annually, Other elements of the evidence base have also since been revised or completed.</p> <p>Changes in national planning guidance been reflected as appropriate in the Revised Preferred Option.</p>
0025	Mr John Ashworth	Runnell Cottage Chapel Road Blackpool	Fully supportive of the aims of the Core Strategy. Supportive of regeneration within Inner Blackpool and housing growth on Marton Moss/M55 Hub.	Comment noted.
0029	United Utilities	Thirlmere House Lingley Mere Warrington	<p>States that there are no supply/demand issues in the Blackpool area for water.</p> <p>For wastewater issues in Blackpool our scheme at Fleetwood waste water treatment works will be completed in November 2010. Any additional foul flows to the works once the scheme has been completed will not cause capacity problems however additional surface water flows to the works would cause</p>	This position is understood. The Infrastructure and Delivery Plan will set out the latest detailed information available on this matter.

Resp No	Name/Company	Address	Comment	Council Response
			<p>flooding problems and capacity problems at the works.</p> <p>This does not necessarily mean that we could not service development but surface water should not enter the combined sewer without causing further flood risk and pollution. If there was no opportunity to dispose of surface water to a soak away, watercourse or surface water sewer, then combined sewer Capacity may not be available.</p>	
0031	Sport England	Building 3 Universal Square Devonshire Street Manchester	Enquires as to the status of neighbourhood plans.	The status of future neighbourhood plans will be considered with regard to the evolving localism agenda, with flexibility to deliver plans most suited to different neighbourhoods as appropriate.
0033	National Grid		Identify a site on Clifton Road that is currently occupied but will be available for redevelopment during the plan period in line with PPS4.	The site on Clifton Road is allocated for industrial/business use by saved Policy DE1 of the Blackpool Local Plan post adoption of the Blackpool Core Strategy. Proposals for new development will be considered in the future when the site becomes available for redevelopment. The Revised Preferred Option will give increased emphasis to employment opportunities, including this location, as a focus for new development to meet needs within south Blackpool.
0035	Blackpool, Fylde & Wyre Economic Development Company		Given the social and economic impacts of the quality of new housing delivered in the town, there needs to be an explicit policy commitment to new housing design guidance. This will sit alongside	Policy CS7 of the Revised Preferred Option 'Quality of Design' specifically refers to the Council's intention to prepare a new housing design guide SPD.

Resp No	Name/Company	Address	Comment	Council Response
			the new guidance on residential conversions to provide comprehensive coverage in ensuring high standards for all new development.	
0039	Mr Brian Summers	5 Village Way Blackpool	<p>Supports the Core Strategy as a whole but questions whether it is realistic and deliverable.</p> <p>Concerned about the use of the Blackpool & Fylde College site being used for housing without reference to reappraising and upgrading the road network.</p> <p>Supporting of the aim to define 'holiday areas'</p> <p>Does not support the concept of shared space.</p>	<p>Comments noted. The Infrastructure and Delivery Plan will provide further details to support the deliverability of major new developments.</p> <p>The Blackpool and Fylde College (Bispham site) is no longer proposed for housing. The lack of funding means the potential relocation of the College closer to Blackpool town centre is no longer a possibility.</p>
0045	Mr Simon Marley	16 Leyfield Close Blackpool	Support of the Core Strategy as a whole particularly regeneration of the Inner neighbourhoods.	Comment noted.
0046	Wyre Borough Council	Civic Centre Breck Road Poulton-le-Fylde	Policies R7, R8, R10, R13, M1, M2, and M6 all identify strategic sites. Consideration could be given to reducing the number of strategic sites, particularly in view of doubts over the deliverability of aspirations for some sites.	The Revised Preferred Option reviewed these policies to reflect the deliverability and importance of strategic sites.
0047	Lancashire Wildlife trust	The Barn Berkeley Drive	The Trust supports the recommended change in wording to Policies S1/S3/S5	Comment noted.

Resp No	Name/Company	Address	Comment	Council Response
		Preston	outlined in the Habitats Regulations Screening Assessment document produced by Bowland Ecology (March 2010) as part of the Council's Evidence Base.	
0050	The Noble Organisation	1a Dukesway Court Team Valley Trading Estate Gateshead	The Core Strategy will need to be reviewed in light of the revocation of the RSS in particular with relation to casino uses.	RSS currently remains – but it is fully accepted there is a need to ensure its content is reviewed in line with evolving policy and changing national guidance.
0051	Mr Paul McEvoy	16 Silverwood Avenue Blackpool	Broadly agrees with the intentions of the Preferred Option. States there needs to be a focus on increased green spaces, sustainable homes and businesses and an attractive resort.	Comment noted.
0052	North and Western Lancashire Chamber of Commerce	1-2 Lockheed Court Amy Johnson Way Blackpool	Supports plans to develop the concept of a Central Business District to help reverse the drift of businesses away from the town centre.	Comment noted.
0053	Mr Lea	12 Strathdale Blackpool	<p>Raises concerns over the deliverability of the Vision.</p> <p>Suggests there is no need for any more large scale developments due to the revocation of the RSS.</p> <p>Amendments need to be made to the Core Strategy in light of recent government changes.</p> <p>Question where the employment opportunities are for people moving into</p>	Comments noted. The Revised Preferred Option has reviewed the strategic level of housing development to meet Blackpool's future needs, and provides further details of related employment opportunities.

Resp No	Name/Company	Address	Comment	Council Response
			<p>the proposed housing.</p> <p>Suggests that Blackpool should not rely on the large scale Tourism as it has done in the past</p>	
0057	Government Office North West	City Tower Piccadilly Plaza Manchester	<p>Strategic sites:</p> <p>The Core Strategy will need to be clear, in relation to the five strategic sites, on how the development will be delivered, such as by a masterplan and/or SPD. It will not, though, be appropriate to devolve all question of implementation down to a masterplan or SPD.</p> <p>If a strategic site is not shown in the Core Strategy to be deliverable, there is a question mark over the achievement of the Core Strategy.</p> <p>Recommend that the Core Strategy or its supporting evidence should indicate how much development is proposed at each strategic site, what the mix of land uses will be, together with information on constraints, infrastructure and phasing. The level of detail will in practice depend on when the site is expected to come forward. For a site anticipated in the early years of the Core Strategy there is an expectation that the detailed delivery</p>	<p>The Revised Preferred Option has reviewed all the strategic sites in line with these requirements – with further information on constraints, infrastructure and phasing set out in the Infrastructure and Delivery Plan which will be published alongside the Pre-Submission version of the Core Strategy.</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>matters such as availability and infrastructure requirements will have been resolved.</p>	
			<p>Housing Allocations:</p> <p>State that if Blackpool Council is still not proposing to prepare an Allocations DPD, the Core Strategy will need to explain how the LDF will fulfil the requirement of PPS3 paras 54 and 55 to identify a specific supply of housing land for the first 10 years and at least broad locations thereafter.</p>	<p>The Council will be preparing a Site Allocation and Development Management DPD on the adoption of the Core Strategy.</p>
			<p>Wording of policies:</p> <p>GONW recommend that, before prior to Publication stage, the policies are revisited as some are currently expressed as objectives. Consideration should be made to reword, combine with other policies or delete. Some examples (but not an exhaustive list) of such policies are S1, S2 and R6 - and see below re R2 and R4.</p> <p>States that Policy R2 is an example of a policy whose wording is rather aspirational/promotional. Recommend that wording is revisited before Publication stage, in a way which makes clear how and when the transformation</p>	<p>The Revised Preferred Option has reviewed the inclusion and wording of all policies.</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>is to come about.</p> <p>States that as well as being expressed as an objective, Policy R4 is worded in a rather vague way. Appreciate that the supporting text expands on the Council's priorities, but the Policy itself will need to be worded in a way which is deliverable and capable of implementation.</p>	
			<p>SA Summaries:</p> <p>It is unclear whether or not the recommendations from the SA have been taken up in the document. Recommends that this is considered in the Submission Document.</p>	<p>Recommendations have been considered and taken forward in the Core Strategy document. The Revised Preferred Option and supporting reports will further clarify and reflect the revised SA undertaken.</p>
			<p>Interface with Fylde Core Strategy:</p> <p>GONW note that close alignment through joint working with Fylde Borough Council is considered to be important in determining a coordinated development strategy for lands on the Blackpool/Fylde boundary.</p> <p>States the publication document will need to make clear what the contingency plan is if proposals for M55 Hub lands do not come forward as expected.</p>	<p>The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>The approach now taken is not dependent on any advance commitment or decisions of Fylde Borough Council about the future development of its lands.</p>

Resp No	Name/Company	Address	Comment	Council Response
0059	Karen Taylor	Themis Chambers Suite 14067 145-147 St Johns Street London	Suggest the Council has prioritised funding and regeneration on the town centre to the detriment of the inner neighbourhoods.	The major focus of the Core Strategy is on maximising regeneration across the resort, town centre, and inner area neighbourhoods. Deliverability of specific development proposals and programmes of improvements remain very much dependent on securing public funding. Every effort is being made across the board to deliver on all fronts. The Council sees these as complementary, rather than competing priorities. A regenerated town centre and resort can only benefit inner area regeneration and vice versa.
Area Based Policies				
0038	Natural England	Hornbeam House Electra Way Crewe Business Park Crewe	<p>We would welcome an element of the following in each policy:</p> <p>To conserve and enhance local landscape and townscape character and quality;</p> <p>To conserve and enhance biodiversity and geodiversity (including soils as a natural resource);</p> <p>To conserve and enhance GI resources and provide links between them; and</p> <p>Promoting walking and cycling routes within the urban centres (including the proposed M55 Hub), within Blackpool and beyond.</p>	<p>In general terms the broad requirement to conserve and enhance landscape and townscape character and quality; to conserve and enhance biodiversity; and to conserve and enhance Green Infrastructure resources are addressed in the overarching Policy CS6 of the Revised Preferred Option 'Green Infrastructure'.</p> <p>Reference to geodiversity has added to Policy CS6 of the Revised Preferred Option 'Green Infrastructure'.</p> <p>Similarly the Revised Preferred Option Policy CS5 (Connectivity) includes the need to promote provision of a network of cycle and pedestrian friendly routes across Blackpool.</p> <p>These themes are also reflected in the area based policies focused on South Blackpool, including</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>In any supporting text we would welcome reference to ecological data to alert developers to possible protected species and the need for ecological surveys being submitted with planning applications.</p>	<p>Policies CS27 (Marton Moss) and CS28 (South Blackpool Transport and Connectivity).</p> <p>Reference has been added to the supporting text to Policy CS27 'Marton Moss' to refer to the Phase 1 Habitats Survey ecological assessment that was completed in 2009 to identify species and habitats of importance on Marton Moss.</p>