

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

Sustainability Appraisal - Post Adoption Statement

FEBRUARY 2023

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

### Sustainability Appraisal - Post Adoption Statement

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### **Version Control**

Version	Date	Author	Checker	Reviewer	Approver	Changes
V1	February 2023	cw	ST	SN	FH	First draft for client review
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This report dated 27 February 2023 has been prepared for Blackpool Council (the "Client") in accordance with the terms and conditions of appointment dated 14 June 2022 (the "Appointment") between the Client and Arcadis Consulting (UK) Limited ("Arcadis") for the purposes specified in the Appointment. For avoidance of doubt, no other person(s) may use or rely upon this report or its contents, and Arcadis accepts no responsibility for any such use or reliance thereon by any other third party.

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### 1 Introduction

## 1.1 What is the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies?

- 1.1.1 Blackpool Local Plan Part 1: Core Strategy (2012 2027) was adopted in January 2016. It is a key planning document for Blackpool. It sets out where new housing, employment, retail and leisure development should be located to meet Blackpool's future needs to 2027.
- 1.1.2 The Blackpool Local Plan Part 2: Site Allocations and Development Management Policies (SADMP) is a key planning document which allocates sites for development, as well as setting out a suite of development management policies to guide appropriate development. Blackpool Council ('The Council') submitted the SADMP to the Planning Inspectorate for independent Examination on 18<sup>th</sup> June 2021. The Examination Hearings were held between 6<sup>th</sup> and 9<sup>th</sup> December 2021, and the Inspector recommended a series of Main Modifications that, should they be implemented, would make the plan 'sound'. These were appraised within the Sustainability Appraisal Addendum: Main Modifications in July 2022. The SADMP was Adopted in February 2023.
- 1.1.3 This Post Adoption Statement has been prepared by Arcadis Consulting (UK) Ltd ('Arcadis') on behalf of the Council as part of a combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA).

### 1.2 What is the Sustainability Appraisal and Strategic Environmental Assessment?

- 1.2.1 SA is the process of identifying the social, economic and environmental effects of a plan to ensure that sustainable development is at the heart of the plan-making process. It applies a holistic assessment of the likely effects of the plan on social, economic and environmental objectives. Section 19 of the Planning and Compulsory Purchase Act 2004¹ requires a local planning authority (LPA) to carry out SA of a Plan. The Town and Country Planning (Local Planning) (England) Regulations 2012² dictate that, after adopting a Plan, the Local Planning Authority must make the SA Report available.
- 1.2.2 Strategic Environmental Assessment (SEA) is a legal requirement set out in The Environmental Assessment of Plans and Programmes Regulations 2004³ (the SEA Regulations).
- 1.2.3 National Planning Policy Guidance (NPPG)<sup>4</sup> states that SA should incorporate the requirements of SEA into one coherent process. This SA Report satisfies the requirements of an SEA Environmental Report. The SA has been applied as an iterative process during the preparation of the Plan to help contribute towards the objective of achieving sustainable development.

<sup>&</sup>lt;sup>1</sup> Available at: https://www.legislation.gov.uk/ukpga/2004/5/contents [Accessed: 12/01/23]

<sup>&</sup>lt;sup>2</sup> Available at: http://www.legislation.gov.uk/uksi/2012/767/contents/made [Accessed: 12/01/23]

<sup>&</sup>lt;sup>3</sup> Available at: http://www.legislation.gov.uk/uksi/2004/1633/contents/made [Accessed: 12/01/23]

<sup>&</sup>lt;sup>4</sup> Available at: https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal [Accessed: 12/01/23]

### 1.3 SA and Local Plan process so far

- 1.3.1 The SA process commenced in January 2017, when the SA Scoping Report prepared by Arcadis was published for consultation. The Scoping Report established the appropriate scope and level of detail of the SA. The Final SA Scoping Report<sup>5</sup> was published in March 2017 following the consultation to take into account representations received from the statutory bodies: the Environment Agency, Natural England and Historic England. This constituted Stage A of the SA process.
- 1.3.2 In early 2019 an Interim SA Report was prepared in order to accompany a Local Plan Informal Consultation Paper of the SADMP. This presented the results of Stage B of the SA Process. The Interim SA Report was first published in July 2019, and the final version published in November 2020<sup>6</sup>. The Interim SA Report was published for consultation between February and April 2021.
- 1.3.3 The Publication SA Report was then finalised taking into consideration changes to the SADMP and representations received during the consultation period. The Publication SA Report was published in April 2021<sup>7</sup>.
- 1.3.4 The SADMP was submitted to the Secretary of State on 18<sup>th</sup> June 2021. The Examination Hearings were held between 6<sup>th</sup> and 9<sup>th</sup> December 2021. During the Examination, including the hearing sessions, the Planning Inspector has identified a number of Main Modifications that were necessary to make the Plan sound.

Table 1-1: Plan and SA/SEA process to date

Plan Stage	SA & SEA Stage	Completed
Evidence Gathering and Issues and Options – Regulation 18 Scoping Document	Stage A. Setting the context and objectives, establishing the baseline and deciding on the scope	SA Scoping Report consulted on January – March 2017 and finalised following responses
Draft Site Allocations and Development Management Policies – Informal Consultation	Stage B. Developing, refining and appraising alternatives and assessing effects Stage C. Preparing SA Report	Stage B: Mostly completed in the Interim SA Report February 2019 with limited number of new assessments completed in November 2020 Stage C: Completed in November 2020
Publication of Plan Regulation 19	Stage C. Update and amend SA Report in light of changes to SADMP Stage D. Consultation on SA Report	Completed in April 2021
Examination and Publication of Modifications	Stages C & D. Update and amend report in light of any Modifications to the SADMP	Examination Hearings held December 2021 Assessment of Main Modifications July 2022
Adoption	Stage E. Adoption Statement	This SA Report

<sup>&</sup>lt;sup>5</sup> Available at: https://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Documents/FINAL-SA-Scoping-Blackpool-LP-Part-2-FINAL-27-03-17.pdf [Accessed: 23/01/23]

<sup>6</sup> Available at: https://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Documents/Local-plan-2021/blackpool-publication-sa-main-report-november-2020-combined.pdf [Accessed: 23/01/23]

<sup>&</sup>lt;sup>7</sup> Available at: https://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Documents/Local-plan-2021/SD005-Sustainability-Appraisal-Update-Apr-21.pdf [Accessed: 23/01/23]

### 1.4 Purpose of the Post Adoption Statement

- 1.4.1 This Post Adoption Statement represents the conclusion of the SA process and fulfils the plan and programme adoption requirements of the SEA Regulations. In accordance with Regulation 16 (4) of the SEA Regulations, this statement sets out the following:
  - How environmental considerations have been integrated into the plan or programme (Chapter 2 of this document);
  - How the environmental report has been taken into account (Chapter 2 of this document);
  - How opinions expressed in response to the consultation on the SA Reports have been taken into account (Chapter 3 of this document);
  - The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with (Chapter 4 of this document); and
  - The measures that could be taken to monitor the significant environmental effects of the implementation of the plan or programme (Chapter 5 of this document).

# 2 How the environmental considerations have been integrated into the Plan?

### 2.1 Overview

- 2.1.1 The purpose of the SA is to integrate sustainability considerations into the plan and help it to achieve its key objectives. This is accomplished using a collaborative and iterative relationship between those carrying out the SA and the plan-makers, based on a phased approach at key stages throughout its development.
- 2.1.2 The National Planning Practice Guidance (NPPG)<sup>8</sup> specifies five stages to the SA Process as follows:
  - Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope (Scoping)
  - Stage B: Developing and refining alternatives and assessing effects
  - Stage C: Prepare the SA Report
  - Stage D: Seek representations on the SA Report from consultation bodies and the public (Consultation)
  - Stage E: Post adoption reporting and monitoring
- 2.1.3 The SA of the Local Plan was undertaken in accordance with this guidance. The following subsections set out how the SA has influenced the Local Plan at each of these key stages.

### 2.2 Scoping

- 2.2.1 Scoping represents the initial stage in the SA process for the emerging Plan and sets the scope for the remainder of the process. The output of this stage was a Scoping Report that formed the basis for consultation with statutory bodies on the proposed scope of the SA (Stage A.5).
- 2.2.2 Stage A: Scoping commenced in November 2016, with an SA Scoping Report prepared by Arcadis, with input from the officers at Blackpool Council and, from 9<sup>th</sup> January to 13<sup>th</sup> February 2017, with the statutory SEA bodies, which are:
  - The Environment Agency (EA);
  - Natural England; and
  - · Historic England.
- 2.2.3 A final Scoping Report was produced for in March 2017. The Scoping Report:
  - Reviewed other relevant programmes, plans and strategies that have an influence on sustainability to establish the policy context of the Plan and the SA;
  - Detailed the characteristics of the current environmental baseline in Blackpool;
  - · Identified key sustainability issues in the Borough; and
  - Set out a Sustainability Appraisal Framework for assessing policies and policy options and the overall predicted effects of the plan.

<sup>&</sup>lt;sup>8</sup> Available at: https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal [Accessed: 12/01/23]

### Stage A.1: Identifying other relevant policies, plans and programmes and SA objectives

2.2.4 Relevant plans, programmes and sustainability objectives were identified during the Scoping stage. A comprehensive review of plans and programmes at a national, regional, county and local level was undertaken to identify implications for future Local Plan policies and the SA Objectives. The list of relevant legislation and policies also sets out how proposals in the SADMP will take these objectives into account.

### Stage A.2 and A3: Collecting baseline information and identifying sustainability issues and opportunities

- 2.2.5 Baseline information detailing a range of social, economic and environmental data was obtained from a number of sources, the findings of which are set out in Appendix B of the SA Publication Report. Collectively this data was used as the baseline to provide the basis for identifying issues and determining objectives for the SADMP.
- 2.2.6 Based on the baseline information, the SA Scoping Report identified key sustainability issues of relevance for the Borough. These are presented in Appendix B of the SA Publication Report. The identified key sustainability issues were grouped under the themes of:
  - Population;
  - · Education and qualifications;
  - Human health;
  - Water:
  - Soil and land quality;
  - Air quality;
  - · Climatic factors and energy;
  - Biodiversity, flora and fauna;
  - · Cultural heritage;
  - Landscape;
  - Minerals and waste;
  - Transportation;
  - Economy;
  - · Deprivation; and
  - Housing.

### Stage A.4: Developing the SA Framework

- 2.2.7 The SA Framework, as set out in Table 2-1, emerged from the SA Scoping stage. It is comprised of 22 SA Objectives that are based around the key sustainability issues in Blackpool. Contributing towards achieving each of these Objectives would be seen as helping tackle the key sustainability issues in the Borough.
- 2.2.8 Every proposal in the SADMP, and all reasonable alternatives, are assessed against every SA Objective of this Framework to elicit meaningful information that helped to inform the Plan preparation. The Objectives generally focus on outcomes, such as improvements to air quality, rather than outputs, such as improvements to bus lanes. The Framework considers topics in a holistic way rather than focussing on one designation and aims for enhancement above conservation or preservation.

2.2.9	For each SA Objective a range of indicators have been identified that help to guide the assessment.
	Each SA Objective also has 'targets' which, if met, would constitute a significant contribution towards
	achieving the SA Objective. The assessment results are presented in a tabular format, with the
	predicted effects described and evaluated for each SA Objective alongside recommendations for
	avoiding or mitigating potential negative impacts, or for enhancing positive impacts, on each SA
	Objective.

Table 2-1: SA Framework

SA Objective and Sub-Objectives	Indicators	Targets
1. To reduce crime, disorder and fear of crime		
To reduce levels of crime To reduce the fear of crime To reduce alcohol and drug misuse To reduce levels of anti-social behaviour To encourage safety by design	<ul> <li>Number and distribution of wards with LSOAs in the bottom 10% most deprived for crime deprivation.</li> <li>Crime rates per 1,000 of the population for key offences. Number of new developments actively incorporating safety by design principles.</li> <li>Number of new initiatives implemented to tackle anti-social behaviour.</li> </ul>	Reduce the number of crimes per 1,000 population.
2. To improve levels of educational attainment for all a	ge groups and all sectors of society	
To improve access to lifelong learning opportunities and other adult education To increase levels of participation and attainment in education for all members of society To increase the percentage of young people who progress into further and higher education and workbased training	<ul> <li>Location and number of educational establishments in Blackpool.</li> <li>Number and distribution of wards with LSOAs in the bottom 10% most deprived for education, skills and training deprivation.</li> <li>Percentage of 15-year-old pupils in local authority schools achieving 5 or more GCSEs at Grades A* - C or equivalent.</li> <li>Percentage of people aged 16-74 achieving National Vocational Qualification (NVQ) level 4 or above.</li> <li>Percentage of resident adults with no qualifications.</li> <li>Percentage of 16-19-year olds continuing into higher education.</li> </ul>	At least 95% of adults to have basic skills in both functional literacy and numeracy. At least 90% of adults to hold at least level 2 qualifications or equivalent. At least 40% of adults to hold at least level 4 qualifications or equivalent. Increase access to education facilities.
3. To improve physical and mental health for all and re	duce health inequalities	
To improve access to health and social care services To reduce health inequalities amongst different groups in the community To promote healthy lifestyles To increase/improve access to greenspace	<ul> <li>Percentage of the resident population who consider themselves to be in good health.</li> <li>Number of wards with LSOAs in the bottom 10% most deprived for health deprivation and disability.</li> <li>Life expectancy at birth for males and females.</li> <li>Percentage of working-age population with a long-term limiting illness.</li> <li>Percentage of adults (16+) taking part in sport and active recreation at least three times a week).</li> <li>Number and distribution of sports facilities and recreational space.</li> </ul>	Increase the number of adults and young people participating in sport and physical activity through increasing accessibility to sport facilities and recreational space. Increase access to health services. Reduce Health Inequalities.  Maintain and increase number of people claiming to be in good health.
4. To ensure housing provision meets local needs		
To reduce the number of unfit homes To reduce multi-occupancy and improve the quality of rented accommodation To increase the availability of decent quality affordable housing for all To reduce levels of homelessness	<ul> <li>Average house price.</li> <li>Percentage of homeowners.</li> <li>Percentage of homes deemed unfit.</li> <li>Percentage of housing vacant.</li> <li>Number of affordable housing completions per annum.</li> </ul>	Increase the number of affordable homes provided in the Borough in accordance with housing targets. Increase the number of empty properties brought back into use. Increase percentage of homeowners.

SA Objective and Sub-Objectives	Indicators	Targets
5. To protect and enhance community spirit and cohes	ion	
To improve relations between all social groups To develop opportunities for community involvement	<ul> <li>Percentage of people in Blackpool who are happy where they live.</li> <li>Percentage of people in Blackpool who take part in decision making and leisure activities within the community.</li> </ul>	Increase the percentage of residents who are happy where they live. Increase the percentage of residents who take part in decision making and leisure activities within the community.
6. To improve access to basic goods, services and ame	enities for all groups	
To improve access to cultural and recreational facilities To maintain and improve access to essential services and facilities	<ul> <li>Number of LSOAs in the bottom 10% most deprived for barriers to housing and services provision.</li> <li>Number of essential services and facilities within local settlements.</li> </ul>	Increase access to basic services and amenities. No net loss of basic services and amenities.
7. To encourage sustainable economic growth and bus	iness development across the Borough	
To increase levels of employment and to increase the range of local employment opportunities To encourage economic growth To encourage new business formation To strengthen Blackpool as a Sub-Regional Centre	<ul> <li>Location of key industries and major employers.</li> <li>Economic activity rate.</li> <li>Employment by sector.</li> <li>Number of VAT registered businesses.</li> <li>Visitor numbers and tourist revenue data.</li> </ul>	Increase number of VAT registered businesses. Provision of sufficient employment land to meet economic needs. No net loss in employment land provision. Increase the visitor spend on tourism. Decrease the numbers of employed people currently working outside of the Borough
8. To promote sustainable tourism		
To encourage sustainable tourism To support the preservation and or development of high quality built and natural environments within the Borough To modernise the tourism industry	<ul> <li>The number of tourists per year in Blackpool.</li> <li>Built and natural environment within the Borough.</li> </ul>	Increase in the number of staying tourists a year in Blackpool. To enhance the built and natural environment within the Borough.
9. To encourage economic inclusion		
To reduce levels of unemployment in areas most at need Improve household earnings	<ul> <li>Number of wards with LSOAs in the bottom 10% most deprived for employment deprivation.</li> <li>Number of wards with LSOAs in the bottom 10% for income deprivation.</li> <li>Percentage of unemployed working-age population.</li> <li>Location of employment areas relative to housing.</li> </ul>	Increase accessibility to employment areas in particular for LSOAs exhibiting higher levels of employment and income deprivation.
10. To deliver urban renaissance		
Improve vitality and vibrancy of the town centre To improve access to public transport in urban areas	<ul> <li>The LSOA values for all deprivation areas within the town centre.</li> <li>Number of people who travel to work by transport.</li> </ul>	Decrease the number of areas with LSOA values below 10% for all deprivation areas within the town centre.

SA Objective and Sub-Objectives	Indicators	Targets
		Increase the percentage of residents who travel to work by public transport rather than drive.
11. To develop and market the Borough as a place to li	ve, work and do business	
To support the preservation and/or development of high quality built and natural environments within the Borough To promote the area as a destination for short- and long-term visitors and new residents  To enhance the Borough's image as an attractive place to do business	<ul> <li>The number of wards with LSOA values in the bottom 10% for economic deprivation.</li> <li>The number of wards with LSOA values in the bottom 10% for educational deprivation.</li> </ul>	Reduce number of LSOA's in the bottom 10% for health deprivation and disability. Improve the overall education of Blackpool's population.
12. To protect, maintain and enhance green infrastruct	ure, biodiversity and geodiversity	
To protect, maintain and enhance designated sites of nature conservation importance To protect, maintain and enhance sites of green infrastructure To protect, maintain and enhance wildlife especially rare and endangered species To protect, maintain and enhance habitats and wildlife corridors To provide opportunities for people to access wildlife and open green spaces To protect, maintain and enhance sites of geodiversity importance	<ul> <li>Number and distribution of designated sites including SSSI's.</li> <li>Condition of SSSIs.</li> <li>Proportion of the population that has full access to the requirements of the Accessible Natural Green Space Standard Number of habitats created, protected or enhanced.</li> </ul>	Maintain and improve number of SSSIs in favourable condition. Increase access to greenspace per head.
13. To protect and enhance the Borough's landscape a	nd townscape character and quality	
To protect and enhance landscape character and quality To protect and enhance townscape character and quality To promote sensitive design in development	<ul> <li>Number, location, size and character of conservation areas.</li> <li>Amount of development in the Borough conservation areas at risk.</li> </ul>	No inappropriate development in the Borough. No net loss of conservation areas. No increase in conservation areas at risk.
14. To protect and enhance the cultural heritage resou	rce	
To protect and enhance historic buildings and sites To protect and enhance historic landscape/townscape value	<ul> <li>Number and distribution of Listed Buildings, Scheduled Monuments, conservation areas and Registered Parks and Gardens.</li> <li>Percentage of listed buildings or other assets on the English Heritage at risk register.</li> <li>Number of permissions granted against English heritage advice.</li> </ul>	No increase in heritage at risk as a result of new development.
15. To protect and enhance the quality of water feature		
To protect and enhance ground and surface waters To protect and enhance coastal waters	Distribution of areas at risk of fluvial and tidal flooding (Environment Agency).	To introduce SuDs into new development.

SA Objective and Sub-Objectives	Indicators	Targets
To encourage the inclusion of flood mitigation measures To encourage the sustainable use of water resources	<ul> <li>Percentage of rivers with good/fair chemical and biological water quality.</li> <li>Number of planning applications granted permission contrary to Environment Agency advice Compliance with Bathing Water Directive.</li> </ul>	No planning permissions granted against EA advice. To meet minimum requirements or better of the Bathing Water Directive at all monitoring points.
16. To guard against land contamination and encourag	e the appropriate re-use of brownfield sites within the urban boundary	y and to protect soil resources
To reduce the amount of derelict, contaminated, and vacant land To encourage development of brownfield land where appropriate To protect soil functions To prevent the contamination of controlled waters	<ul> <li>Percentage of housing completions on previously developed land.</li> <li>Percentage of employment development on previously developed land.</li> </ul>	100% of new and converted dwellings on previously developed land. Greater than 51% of employment land permitted for development on previously developed land [Annual Monitoring Report].
17. To limit and adapt to climate change		
To reduce or manage flooding To reduce greenhouse gas emissions To encourage the inclusion of SuDS To promote the development of multifunctional green infrastructure	<ul> <li>Total carbon dioxide (CO<sub>2</sub>) emissions per capita per year.</li> <li>Number of SuDS implemented across Blackpool.</li> <li>Number of planning applications granted permission contrary to Environment Agency advice regarding flooding.</li> <li>Number of GI projects implemented across Blackpool.</li> </ul>	To reduce per capita CO2 emissions each year.  No planning applications permitted contrary to EA advice on flooding.  Number of new developments where SuDS are appropriately used to increase each year.
18. To protect and improve air quality		
To protect and improve local air quality	<ul> <li>Number and distribution of AQMAs.</li> <li>Combined Air Quality.</li> <li>Indicator Scores for LSOAs in Blackpool.</li> </ul>	No new AQMAs to be designated in Blackpool or increase the area or size of the existing AQMA.
19. To increase energy efficiency and require the use of	f renewable energy sources	
To increase energy efficiency To increase the use of renewable energy To reduce the use of energy	<ul> <li>Total carbon dioxide (CO<sub>2</sub>) emissions per capita per year.</li> <li>Annual average domestic gas and electricity consumption per consumer.</li> <li>Annual gas and electricity consumption in the commercial/industrial sector.</li> <li>Number of applications for renewable energy developments and details of their location.</li> </ul>	To reduce per capita CO <sub>2</sub> emissions each year. Include more developments with renewable energy systems implemented into the design.
20. To ensure sustainable use of natural resources		
To reduce the demand for raw materials To promote the use of recycled and secondary materials in construction	<ul> <li>Incorporation of secondary and recycled materials in new development projects.</li> <li>Number of sustainable design schemes implemented.</li> <li>Use of BREEAM4 in new developments.</li> </ul>	Increase use of secondary and recycled materials in construction for new developments. Increase use of water efficiency schemes in new developments.

SA Objective and Sub-Objectives	Indicators	Targets
21. To minimise waste, increase re-use and recycling		
To increase the proportion of waste recycling and reuse To reduce the production of waste To reduce the proportion of waste landfilled	<ul> <li>Levels of composting and recycling achieved.</li> <li>Amount of household waste landfilled.</li> </ul>	Increase the percentage of municipal waste recycled from. Decrease the amount of fly-tipping.
22. To promote the use of more sustainable modes of	transport	
To reduce the use of private car To encourage walking, cycling and the use of public transport Encourage the uptake of ICT	<ul> <li>Journey to work by mode.</li> <li>Public transport patronage.</li> <li>Percentage of dwellings approved and located within 400m of an existing or proposed bus stop or within 800m of an existing or proposed railway station.</li> </ul>	To increase use of sustainable transport and reduce private car dependence. To increase access to broadband internet across the Borough (for residential and employment uses).

# 2.3 Developing and refining alternatives, assessing effects and preparing the SA Report

### **Overview**

2.3.1 Stage B is the primary assessment stage of the SA process. There was interaction between the planmaking and SA teams during Stage B with SA being undertaken at the Draft SADMP stage and again at Publication stage. This enabled potential adverse effects of the Plan to be avoided/minimised and potential sustainability benefits maximised. Assessment results and recommendations were fed back to the plan-making team on an iterative basis. The key elements of the SADMP that were assessed through the SA process are outlined in the following subsections.

### The SA of the Core Strategy

- 2.3.2 The Core Strategy replaces many of the policies in the Blackpool Local Plan 2001 2016. The following components of the Local Plan 2012 2027 have been finalised and adopted:
  - A Spatial Vision for the Borough until 2027;
  - Strategic Objectives for the emerging Local Plan;
  - A Spatial Strategy for where future development should take place in the Borough; and,
  - Core Policies and other policies by topics to provide key development principles.
- 2.3.3 Each of the above was appraised in various iterations of SA Reports for the Blackpool Core Strategy. The full results of the SA of the Core Strategy are documented in the May 2014 Sustainability Appraisal of the Proposed Submission Core Strategy, Sustainability Appraisal Report that is available online alongside the adopted Core Strategy document<sup>9</sup>.
- 2.3.4 The purpose of this SA Report is to document the findings of the SADMP and its accompanying SA process. The SA of the Core Strategy assessed the following elements and reasonable alternatives:
  - Spatial Vision
  - Goals and Strategic Objectives
  - Core Policies

### DM Policies in the SADMP

- 2.3.5 DM Policies are designed to help guide development in the Borough. The SADMP proposes 42 DM Policies, as listed in Table 2-5 These policies are spread across seven themes. Arriving at these proposals set out in the SADMP has been a robust, lengthy and evidence-led process, including an iterative relationship between the Plan-making and SA to enable the Council to factor the sustainability performance of options into their decision making. This is explained further in Chapter 4 of this Post Adoption Statement.
- 2.3.6 Each DM policy has been assessed for its likely impacts on each SA Objective. These results are presented in their entirety in Appendix C of the November 2020 SA Report, where an assessment table is provided for each of the seven themes.

<sup>&</sup>lt;sup>9</sup> Available at: https://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan/Corestrategysubmission.aspx [Accessed: 09/02/23]

- 2.3.7 Within the assessment tables, the following is presented for each policy for each SA Objective:
  - A score for the overall effect on the SA Objective;
  - An indication of the uncertainty, timescale, reversibility of each effect;
  - A description of the positive or adverse effect; and
  - Recommendations for enhancing or mitigating effects.
- 2.3.8 The SA Scores recorded for each Policy have been brought together in Table 2-2. The assessments of DM policies identified predominantly neutral or positive impacts for the majority of SA Objectives. Policy DM7 allocates and safeguards land for employment purposes these were assessed in the sites assessments.
- 2.3.9 A very limited number of potential adverse effects were identified during the appraisal of DM policies and none of these adverse effects are significant either alone or cumulatively. For example, minor adverse effects were identified for Policy DM8 against three SA Objectives, namely those related to energy, natural resources and waste, as the Policy promotes new economic development that would be likely to lead to a net increase in energy and resources consumption with a subsequent production of waste. However, DM8 would also be likely to lead to positive impacts on a range of SA Objectives, particularly as the land proposed for new economic development at the Airport Enterprise Zone is predominantly brownfield.
- 2.3.10 Minor adverse effects were also identified for Policy DM32 Wind Energy as it is thought to be likely that the installation of wind turbines would pose a risk to local character, views or setting. However, it is essential that the Council proceeds towards increasing the local supply of renewably sourced energy, such as wind energy, in order to contribute towards local and national efforts to combat the causes of climate change. The HRA accompanying the Publication SADMP has ruled out a significant effect on a SAC or SPA as a result of the installation of wind turbines.
- 2.3.11 Overall, it is expected that DM policies proposed in the SADMP will build positively on the adopted Core Strategy and help to ensure that future development, including that allocated in the Plan itself, can be sustainable.

### **Site Allocations**

- 2.3.12 Table 2-6 lists sites proposed in the SADMP for allocation for various types of development. Each of these have been appraised for their likely effects on each SA Objective, the results of which are set out in the assessment tables in Appendix D of the November 2020 SA Report. Each assessment table presents the assessment results for multiple sites at a time the sites have been 'clustered' or grouped together in this way because the clustered sites are in proximity with one another, and the proposed allocations would be dealing with similar environmental constraints. This 'cluster' approach allows for more efficient and readable assessment results and lends itself to an effective cumulative effects assessment process.
- 2.3.13 The overall effect of each site on each SA Objective is symbolised using the scores from Table 2-3. For each site, and for each Objective, an 'Initial Score' and a 'Residual Score' is provided. The Initial Score is the likely overall effect of the Site on the SA Objective based on the current situation (including the influence of Core Strategy Policies). The Residual Score factors in the likely effect of recommendations made to the Council as well as the DM Policies proposed in the SADMP. There is therefore a greater degree of uncertainty with determining Residual Scores.

- 2.3.14 The Core Strategy has been adopted by the Council and within it are policies that would be expected to help ensure development in Blackpool is sustainable. As these policies are now in effect, any new development in the Borough would need to accord with their requirements. In many cases, the Core Strategy Policies would be likely to help ensure potential adverse effects on the environment are avoided or mitigated and to help enhance positive effects. When assessing site allocations, the likely effects of each site have therefore been considered in light of the likely influence of Core Strategy Policies. Table D-4 in Appendix D of the November 2020 SA Report sets out the Core Policies most likely to notably influence effects against each SA Objective.
- 2.3.15 The SA Scores recorded for each site allocation against each SA Objective are presented in Table 2-3. The significant majority of the identified effects are positive. Significantly positive effects were frequently identified for the Crime, Education, Health, Housing, Access and Transport SA Objectives. Effects on the Tourism, Economic inclusion, Urban renaissance, Attractive place to live and work, Biodiversity, Landscape and Cultural heritage objectives were also overwhelmingly positive. Effects on the Land resource Objective were positive for the majority of sites, although where development has been proposed on previously undeveloped sites a minor adverse score was recorded. The only significant adverse effects identified in the assessments were for site allocations that contain Grade 3 Agricultural Land Classification (ALC) soils. It is unknown if these are Grade 3a, which are some of the best and most versatile soils in the Borough, or Grade 3b, which are less versatile and productive.
- 2.3.16 For SA Objectives on climate change, water, energy, natural resources and air quality, the majority of sites were recorded as having minor adverse effects. This is because these sites are currently vacant or unused and the proposed development at these site allocations would result in the site being home to new residents or employees. These residents or employees would be expected to consume water, energy and natural resources and to follow lifestyles that result in some degree of air pollution and GHG emissions. The operation of businesses, or the lives of local residents, is likely to be relatively sustainable in Blackpool given the proximity of people to jobs and services and the excellent public transport modes on offer. Various policies in the Core Strategy would also be expected to help ensure that new development is energy and water efficient. However, a net increase in relation to current levels at each site is not going to be entirely avoided or mitigated and so in each case a minor (not significant) adverse effect was recorded.

### **Cumulative Effects**

- 2.3.17 An important element of SA is the consideration of cumulative effects. Cumulative effects arise, for instance, where several proposals each have insignificant effects but together have a significant effect, or where several individual effects of the proposal have a combined effect. Synergistic effects interact to produce a total effect greater than the sum of the individual effects, so that the nature of the final impact is different to the nature of the individual effects.
- 2.3.18 Table 6-1 of the Publication SA Report<sup>10</sup> November 2020, presents an assessment of the likely cumulative effects of all proposals in combination against each SA Objective. This is presented in this report, as Table 2-4. This process naturally involves a large degree of uncertainty and assumptions have to be made in each case. Best efforts have been made to provide an indication of the overall uncertainty of effects and to identify likely significant effects.
- 2.3.19 The assessment of cumulative effects is spread across eleven themes, each of which is a combination of one or more SA Objectives. This assessment factors in the influence of the adopted

<sup>&</sup>lt;sup>10</sup> Available at: https://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Documents/Local-plan-2021/blackpool-publication-sa-main-report-november-2020-combined.pdf [Accessed: 07/02/23]

Core Strategy as any development in Blackpool would need to accord with its various requirements. The Local Plan would be expected to help Blackpool maximise its growth opportunities, particularly through the enhancement of the visitor experience, economic inclusion and the provision of skills learning. The delivery of high-quality housing, the excellent accessibility of healthcare facilities and the anticipated improvement to rates of employment would strengthen the resilience of communities in the Borough.

### Consultation

2.3.20 Consultation with statutory bodies and the public was undertaken throughout the iterative Plan development process. Chapter 3 describes how the opinions expressed during consultation were taken into account and influenced the development of the Plan throughout the process.

Table 2-2: SA Scores recorded for each DM policy against each SA Objective

Positive + Neutral O											Adve	erse	-									
Major	Positi	ve +	+	F	ositive	/Advers	e +/	-		Maj	or Adve	erse										
Policy	SAO1 Crime	SAO2 Education	SAO3 Health	SAO4 Housing	SAO5 Community	SAO6 Access	SAO7 Economy	SAO8 Tourism	SAO9 Employment	SAO10 Urban Ren.	SAO11 Market dev.	SAO12 Biodiversity	SAO13 Landscape	SAO14 Cultural Heritage	SAO15 Water	SAO16 Land	SAO17 Climate Change	SAO18 Air quality	SAO19 Energy	SAO20 Natural Resources	SAO21 Waste	SAO22 Transport
Housing Policies																						
DM1	+	+	+	++	+	+	+	0	0	+	+	+	+	+	+	0	+	+/-	0	0	+	+/-
DM2	0	0	+	+	+	+	+	0	0	+	+	+	+	+	0	+	0	+	0	0	+	+
DM3	0	0	+	++	+	+	0	0	0	+	+	+	+	+	0	0	+	+	0	0	0	+
DM4	0	+	+	++	+	+	0	0	0	+	+	0	+	+	0	0	+	+	0	0	0	+
DM5	0	0	+	+	+	+	+	0	+	+	+	0	+	+	0	0	0	+	0	0	0	+
DM6	0	0	0	+	+	+	+	+	0	+	++	0	+	+	0	+	+	+	0	0	0	+
Economy	Policies	•																				
DM7	Assesse	ed as ind	ividual s	te alloca	ations																	
DM8	0	+	++	+	+	0	++	+	++	+	+	+	+	+	0	+	+/-	+/-	-	-	-	+/-
DM9	0	0	0	0	0	0	+	++	+	+	+	0	+	+	0	0	0	0	0	0	0	0
DM10	+	0	0	0	+	0	+	++	+	+	++	0	+	+	0	0	0	0	0	0	0	0
DM11	0	0	0	+	+	+	+	+	+	+	++	0	+	0	0	0	0	0	0	0	0	+
DM12	0	0	0	+	+	+	+	+	+	+	++	0	+	+	0	0	0	0	0	0	0	+
DM13	+	0	+	0	+	0	+	+	+/-	+	++	0	+	+	0	0	0	0	0	0	0	0
DM14	0	0	0	0	+	+	+	+	+	+	++	0	+	+	0	+	+	+	0	0	0	+
DM15	0	0	0	0	0	+	+	+	+	+	+	0	+	+	0	0	0	0	0	0	0	0

Policy	SAO1 Crime	SAO2 Education	SAO3 Health	SAO4 Housing	SAO5 Community	SAO6 Access	SAO7 Economy	SAO8 Tourism	SAO9 Employment	SAO10 Urban Ren.	SAO11 Market dev.	SAO12 Biodiversity	SAO13 Landscape	SAO14 Cultural Heritage	SAO15 Water	SAO16 Land	SAO17 Climate Change	SAO18 Air quality	SAO19 Energy	SAO20 Natural Resources	SAO21 Waste	SAO22 Transport
DM16	0	0	++	0	+	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0
Design Po	licies																					
DM17	+	0	0	0	+	0	+	+	0	+	+	0	++	++	0	0	0	0	0	+	+	0
DM18	0	+	0	0	+	+	+	0	+	0	0	0	0	0	0	0	+	+	0	0	0	+
DM19	0	0	0	0	0	0	0	0	0	0	0	0	++	++	0	0	0	0	0	0	0	0
DM20	0	0	0	+	+	0	0	0	0	+	0	0	+	+	0	0	0	0	0	0	0	0
DM21	+	0	+	0	+	+	+	+	+	+	+	++	+	+	+	0	+	+	0	0	0	0
DM22	0	0	0	0	0	0	+	+	+	+	+	0	+	+	0	0	0	0	0	0	0	0
DM23	+	0	0	0	0	0	0	0	0	0	+	0	+	+	0	0	0	0	0	0	0	0
DM24	0	0	0	0	0	0	+	+	+	+	+	0	+	+	0	0	0	0	0	0	0	0
DM25	0	0	+	+	0	0	+	+	+	+	+	0	+	0	0	0	0	0	0	0	0	0
Heritage F																						
DM26	0	+	0	0	+	0	0	++	0	+	+	0	++	++	0	0	0	0	0	0	0	0
DM27	0	+	0	0	+	0	0	++	0	+	+	0	++	++	0	0	0	0	0	0	0	0
DM28	0	+	0	0	+	0	0	++	0	+	+	0	++	++	0	0	0	0	0	0	0	0
DM29	0	+	0	0	+	0	0	+	0	0	+	0	+	++	0	0	0	0	0	0	0	0
DM30	0	+	0	0	++	0	0	++	0	0	+	0	+	++	0	0	0	0	0	0	0	0
Environme																						
DM31	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	+	0	0	0	0	0	0
DM32	0	0	0	0	0	0	0	0	0	0	0	0	-	+	0	0	+	0	+	0	0	0
DM33	0	0	+	0	+	0	0	++	0	+	+	++	+	+	+	+	+	+	0	0	0	0

Policy	SAO1 Crime	SAO2 Education	SAO3 Health	SAO4 Housing	SAO5 Community	SAO6 Access	SAO7 Economy	SAO8 Tourism	SAO9 Employment	SAO10 Urban Ren.	SAO11 Market dev.	SAO12 Biodiversity	SAO13 Landscape	SAO14 Cultural Heritage	SAO15 Water	SAO16 Land	SAO17 Climate Change	SAO18 Air quality	SAO19 Energy	SAO20 Natural Resources	SAO21 Waste	SAO22 Transport
DM34	0	0	+	0	+	0	0	+	0	+	+	++	++	+	+	+	+	+	0	0	0	0
DM35	0	0	+	0	+	0	0	+	0	+	+	++	++	+	+	+	+	+	0	0	0	0
DM36	+	0	+	0	+	0	0	0	0	0	+	+	+	+	0	++	+	+	0	0	0	0
Communit	y Polici	es																				
DM37	+	+	++	0	++	++	+	+	0	0	0	+	+	++	0	0	0	0	0	0	0	+
DM38	0	0	+	0	+	+	0	0	0	0	+	++	+	+	+	+	+	+	0	0	0	0
DM39	0	0	++	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+
DM40	0	++	0	0	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	+
Transport	Policies	5																				
DM41	+	0	+	0	0	++	+	+	+	0	0	0	0	0	0	0	+	+	0	0	0	++
DM42	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0

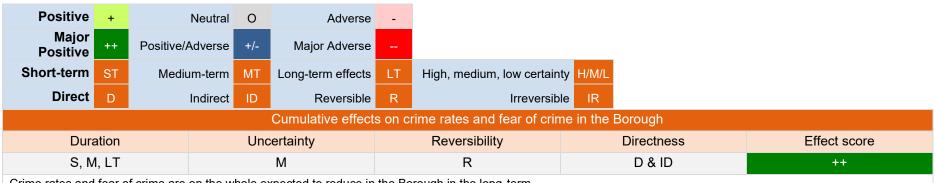
Table 2-3: ISA Scores recorded for each site allocation against each SA Objective

			Р	ositive	+				Neutral	0				,	Adverse	-						
IV	lajor P	ositive	(signi	ificant)	++		F	ositive/	Adverse	+/-		Maj	jor Adve	erse (sig	nificant)							
SA Object	ctive																					
Site ref	SAO1 Crime	SA02 Education	SAO3 Health	SA04 Housing	SAO5 Community	SAO6 Access	SAO7 Economy	SAO8 Tourism	SAO9 Employment	SAO10 Urban Ren.	SAO11 Market dev.	SAO12 Biodiversity	SAO13 Landscape	SAO14 Cultural Heritage	SAO15 Water	SAO16 Land	SAO17 Climate Change	SAO18 Air quality	SAO19 Energy	SAO20 Natural Resources	SAO21 Waste	SAO22 Transport
									New	housin	g site al	location	S									
HSA1.1	+	++	+	+	++	+	+	+	+	+	+	+	+	0	0	+	0	0	0	0	0	++
HSA1.2	+	+	++	++	-	++	+	+	+	+	-	-	-	0	-	-	-	-	-	-	-	++
HSA1.3	+	++	++	+	+	++	+	0	+	+	+	-	0	0	0	0	0	0	0	0	0	++
HSA1.4	+	++	++	+	+	++	+	0	+	+	+	-	0	0	0	0	0	0	0	0	0	++
HSA1.5	+	++	++	++	+	++	+	0	+	+	+	-	-	0	-	-	-	-	-	-	-	++
HSA1.6	++	+	++	+	+	++	+	+	+	+	+	+	+	0	0	+	0	0	0	0	0	++
HSA1.7	+	+	++	+	+	++	+	+	+	+	+	+	+	0	+	0	-	0	0	0	0	++
HSA1.8	++	+	++	+	+	++	+	+	+	+	+	+	+	+	-	+	-	-	-	-	-	++
HSA1.9	+	+	++	+	+	++	+	+	+	+	+	+	+	+	0	+	0	0	0	0	0	++
HSA1.10	+	++	++	+	+	++	+	+	+	+	+	+	+	0	0	+	0	0	0	0	0	++
HSA1.11	+	++	++	+	+	++	+	0	+	+	0	-	0	0	0	-	0	0	0	0	0	+
HSA1.12	+	++	++	+	+	++	+	0	+	0	+	-	0	0	0	-	0	0	0	0	0	++
HSA1.13	+	+	+	+	+	++	+	0	+	0	+	-	0	0	0	-	0	0	0	0	0	++
HSA1.14	+	+	++	+	+	++	+	+	+	+	+	+	+	0	-	+	-	-	-	-	-	+

SA Objective																						
Site ref	SAO1 Crime	SA02 Education	SAO3 Health	SAO4 Housing	SAO5 Community	SAO6 Access	SAO7 Economy	SAO8 Tourism	SAO9 Employment	SAO10 Urban Ren.	SAO11 Market dev.	SAO12 Biodiversity	SAO13 Landscape	SAO14 Cultural Heritage	SAO15 Water	SAO16 Land	SAO17 Climate Change	SAO18 Air quality	SAO19 Energy	SAO20 Natural Resources	SAO21 Waste	SAO22 Transport
HSA1.15	+	+	+	+	+	++	+	0	+	+	-	-	-	0	-	-	-	-	-	-	-	++
HSA1.16	+	+	+	+	+	++	+	0	+	+	-	-	-	0	-		-	-	-	-	-	++
HSA1.17	+	++	++	+	+	++	+	0	+	+	+	-	0	0	0	0	0	0	0	0	0	++
HSA1.18	+	++	++	+	+	++	+	0	+	+	+	-	0	0	0	0	0	0	0	0	0	++
HSA1.19	++	+	++	+	+	++	+	+	+	+	+	+	+	+	0	+	0	0	0	0	0	++
HSA1.20	++	+	++	+	+	++	+	+	+	+	+	+	+	0	-	+	-	-	-	-	-	++
HSA1.21	++	+	++	+	+	++	+	+	+	+	+	+	+	0	0	+	0	0	0	0	0	++
HSA1.22	++	+	++	+	+	++	+	+	+	+	+	+	+	+	0	+	0	-	0	0	0	++
HSA1.23	+	+	++	++	+	++	++	+	++	++	++	+	+	+	-	++	-	-	-	-	-	++
HSA1.24	+	+	++	+	+	++	+	+	+	+	+	-	+	0	-	+	-	-	-	-	-	+
HSA1.25	+	++	++	+	++	+	+	+	+	+	+	+	+	0	-	+	-	-	-	-	-	+
HSA1.26	+	++	++	+	+	++	+	+	+	+	+	+	+	0	0	+	0	0	0	0	0	++
HSA1.27	+	++	++	+	+	++	+	0	+	+	+	+	+	0	-	+	-	-	-	-	-	++
HSA1.28	++	++	++	+	+	++	+	+	+	+	+	+	+	0	0	+	-	-	-	-	-	++
HSA1.29	++	+	++	+	+	++	+	+	+	+	+	+	+	0	-	+	-	-	-	-	-	++
Employment land under safeguarded under Policy DM7																						
DM7	+	+	+	0	+	++	++	+	++	++	++	+	+	+	-	++	-	-	-	-	-	++
	Allotment Allocation																					

SA Obje	ctive																					
Site ref	SAO1 Crime	SAO2 Education	SAO3 Health	SA04 Housing	SA05 Community	SAO6 Access	SAO7 Economy	SAO8 Tourism	SAO9 Employment	SAO10 Urban Ren.	SAO11 Market dev.	SAO12 Biodiversity	SAO13 Landscape	SAO14 Cultural Heritage	SAO15 Water	SAO16 Land	SAO17 Climate Change	SAO18 Air quality	SAO19 Energy	SAO20 Natural Resources	SAO21 Waste	SAO22 Transport
ASA1	0	0	+	0	+	0	0	0	0	0	0	+	+	0	+	+	+	0	0	0	0	0
										Mixed-u	se Alloc	ation										
MUSA1	+	0	0	0	+	+	+	+	+	+	?	0	-	-	-	+	-	-	-	-	-	-

Table 2-4: Cumulative and synergistic effects assessment of proposals in the Local Plan 2012 – 2027 (including Part 1 and Part 2)



Crime rates and fear of crime are on the whole expected to reduce in the Borough in the long-term.

This is particularly the case within the inner urban areas due to the overall regeneration and high-quality living and working environments (proposed through all elements of the Local Plan) improving aspirations.

The substantial provision of a broad range of new employment opportunities in accessible locations, including for those in the most need, would make a major contribution towards combatting crime rates.

The protection and provision of community facilities, along with high-quality public realms and development designs that encourage high rates of natural surveillance, would be expected to contribute towards a reduced risk of crime as well as a lowered fear of crime.

Cumulative effects on educational and skills attainment within the Borough's population											
Duration	Duration Uncertainty Reversibility Directness Effect score										

S, M, LT L R D & ID ++
------------------------

Levels of educational and skills attainment for local people have the potential to improve in the long-term.

Site allocations in the SADMP would help to ensure residents have excellent access to a range of educational facilities and opportunities. Policies in both the Plan Parts 1 and 2 would contribute towards an improved offering and accessibility of high-quality educational facilities and opportunities, including at primary and secondary schools as well as colleges and Blackpool University. The proposed range of policies, particularly in those in the Core Strategy, would also be likely to contribute towards an improved quality of life and improved aspirations. The proposed provision of new and diverse employment land would also help to provide skills training opportunities for local people.

Cumulative effects on the health of the Borough's population									
Duration Uncertainty Reversibility Directness Effect score									
S, M, LT	L	R	D & ID	++					

Levels of health and well-being have the potential to improve in the long-term.

The Core Strategy as well as the proposed DM Policies would help to significantly regenerate and improve environmental quality within Blackpool and would deliver new, accessible, high-quality, and affordable housing and employment development whilst enhancing GI and the quality of the public realm. These provisions would cumulatively contribute towards improved living standards and a better quality of life for local people. The provision of a broad range of high-quality jobs, homes and leisure facilities would make a major contribution towards facilitating improvements to the physical and mental wellbeing of local people.

The various provisions to improve green networks and pedestrian / cyclist networks within the Borough would encourage increased physical activity and healthier lifestyles. Site allocations are situated in locations that would provide residents with excellent access to health facilities, including GP surgeries, Blackpool Victoria Hospital, and green spaces. The excellent access to the coastline afforded to most residents in the Borough is likely to be beneficial to their mental wellbeing.

# Cumulative effects on housing provision Duration Uncertainty Reversibility Directness Effect score S, M, LT L R D ++

Housing will be provided to meet the identified Borough requirement. The Local Plan provides for an increased range, quality, and affordability of housing to meet current and future needs. There is a very clear focus upon the need to rationalise existing housing and accommodation stock to raise standards. In so doing the Plan would help to significantly reduce rates of homelessness, deprivation, poverty, inequality and crime.

	Cumulative effects on community spirit in the Borough									
Duration Uncertainty Reversibility Directness Effect score										
S, M, LT	M	R	D & ID	++						

Community spirit has the potential to improve within the inner areas of the Blackpool Borough. The reduced level of development in South Blackpool, particularly at Marton Moss, could help to preserve the existing community spirit and cohesion in these areas in the long-term. Targeted development and regeneration within the resort core and town centre, including the provision of high-quality housing and employment opportunities of improved accessibility, would help to deliver urban renaissance and associated improvements to community spirit and pride through improved aspirations and social wellbeing.

Adopting a neighbourhood planning approach in South Blackpool to development at Marton Moss is also likely to offer benefits for community spirit and cohesion by actively engaging the community in the future evolution of this area.

The Plan provides protection to community facilities throughout Blackpool. New and existing residents in the Borough would be expected to have excellent access to various communal spaces, such as shopping area, pubs and parks. The high-quality development delivered through the Plan would also be expected to help protect and enhance the local sense of place and distinctive character.

	Cumulative effects on access to goods and services in the Borough									
Duration Uncertainty Reversibility Directness Effect score										
S, M, LT	L	R	D	++						

Access to services and facilities for local people would be expected to significantly improve by 2027.

The Core Strategy aims to provide employment, education and housing provision for all in accessible locations. Improved connectivity within the borough is a key feature of the Core Strategy, particularly through sustainable travel. The SADMP would help to ensure new residents are situated in locations where they have excellent access to a broad range of services and facilities and can reach them quickly and easily via walking, cycling and public transport. Various policies would also help to ensure that the accessibility of homes and communities, including walking, cycling and public transport routes, are protected and enhanced.

	Cumulative effects on sustainable economic growth and tourism									
Duration Uncertainty Reversibility Directness Effect score										
S, M, LT	L	R	D	++						

Employment creation, business development and economic growth would be ensured through the Local Plan. Both Parts 1 and 2 would directly contribute towards sustainable economic growth (particularly through sustainable tourism), employment provision and economic inclusion. They would also contribute towards an improved natural and built environment, together with improved connectivity and housing provision, and this would help to market the Blackpool borough for increased investment. The focus on regeneration within the resort core and the town centre facilitates the provision of a diverse range of employment opportunities. Directing the majority of new employment development towards the south of Blackpool would expand upon existing employment development already there and would capitalise upon sites that are situated on the Blackpool/Fylde border. This demonstrates the need for continued collaboration between the authorities to maximise the potential of this area. The range of employment sites and the types of businesses permitted in these locations would be expected to help diversify the Borough's economy over the Plan-period and to ensure it can adapt and compete regionally and nationally.

	Cumulative effects on economic inclusion in the Borough									
Duration Uncertainty Reversibility Directness Effect score										
S, M, LT	L	R	D	++						

Sustainable economic development and employment sites will be focused within the urban areas, which are the most economically deprived locations. This would ensure economic inclusion and a reduction in unemployment in the areas most at need. The range of employment, retail and mixed-use site allocations proposed in the SADMP

would help to situate this development in highly accessible locations that will benefit the employment opportunities of Blackpool's residents whilst also enhancing the commercial viability of this development.

Improved accessibility within the Borough, with improved public transport and walking / cycling opportunities, together with the location of jobs and homes within close proximity, should ensure easy access to employment for all. The protection and enhancement of GI, as set out in Core Strategy and DM Policies, would help to encourage higher rates of footfall in central areas of the Borough and this would be expected to help businesses here operate successfully. Diversification of the economy would be encouraged, which would also aid the skills development of local people. This is further supported by the training and mentoring schemes sought through the Core Strategy.

Cumulative effects on biodiversity								
Duration	Uncertainty	Reversibility	Directness	Effect score				
S, M, LT	Н	R	D	+				

The Core Strategy seeks to provide protection for biodiversity resources within Blackpool and sets out clear guidelines for this purpose. CS Policies seek to protect and enhance the GI network extending throughout the Borough and this would be likely to benefit biodiversity and wildlife in Blackpool and adjacent areas. It is also expected that the change of approach at Marton Moss within the Core Strategy (i.e. a focus upon retention and enhancement of its distinctive character) will also positively contribute to protecting biodiversity resources.

Various DM Policies in the SADMP would help to protect and enhance areas, designations, and features of biodiversity value from harm caused by development.

The majority of development would be on brownfield sites and this will help to limit the loss of greenfield land. However, a minor net loss of greenfield land remains likely as there are a limited number of small sites containing greenfield land.

Development on brownfield sites is an opportunity to enhance the biodiversity value within the sites, this is also a chance to improve local habitat connectivity such as by incorporating new GI elements into proposals as required in various Core Strategy policies. It is somewhat uncertain the extent to which there would be a coherent GI network extending throughout Blackpool and if this would be proactively and effectively managed. This could potentially have a minor adverse effect on local habitat connectivity, although it is also expected that proposals would replace any lost GI elements as much as is considered to be feasible. For example, there is a requirement in the Core Strategy for any proposal that would result in the loss of a tree to replace this tree with two of similar maturity and species. It may therefore be feasible for the SADMP to lead to a net increase in tree canopy in the Borough which, if achieved, is an indicator of a more coherent ecological network for wildlife. Blackpool is considered to have a tree canopy cover of approximately 4.4% which is the second lowest in the country behind only Fleetwood (which has approximately 4.3% tree cover and is just north of Blackpool). Greater tree canopy cover can provide significant benefits to local biodiversity and habitat connectivity and the Local Plan is an opportunity to ensure that new developments provide appropriate levels of new planting.

Cumulative effects on townscape and landscape quality in the Borough										
Duration Uncertainty Reversibility Directness Effect score										
S, M, LT	Н	R	D	+						

CS and DM Policies seek to provide protection and enhancement for the historic townscape and cultural heritage of the Borough by helping to ensure development avoids or mitigates any potential adverse effects. The regeneration of the resort core and the town centre would help to generate benefits for the townscape through an enhanced environmental and built quality. The Core Strategy specifically promotes high standards of design in all developments to maintain the integrity of the existing character / built

quality and contribute to the distinctiveness of the Borough. Sites allocated in the SADMP generally situate development in locations where they would be in-keeping with the existing setting e.g. residential development is typically directed towards predominantly residential areas. In some cases, the proposed development in the SADMP would be likely to regenerate and revitalise empty plots of land and in so doing could help to enhance the local character as well as the setting of nearby heritage assets. Although the Core Strategy seeks to respect the separate identities of Fylde and Blackpool, potential negative impacts could be experienced within the more rural areas (within the Fylde and Blackpool boroughs) adjacent to the M55, through increased visual intrusion. There is also a risk that some sites allocated in the SADMP could lead to the loss of open spaces or GI and this could adversely impact the local character as well as the setting of any nearby heritage assets.

	Cumulative effects on waste and natural resources						
Duration	Duration Uncertainty Reversibility Directness Effect score						
S, M, LT	Н	R	D	+/-			

The Core Strategy makes provisions for sustainable development and design, incorporating energy efficiency and the use of renewable energy, the prudent use of natural resources, and the use of SuDS. However, it is considered to be likely that the cumulative effect of all development in Parts 1 and 2 of the Plan in-combination would be a net increase in the consumption of water, energy and natural resources as well as a net increase in the generation of waste sent to landfill.

There are recognised constraints in the South Blackpool area relating to sewerage capacity.

	Cumulative effects on sustainable transport						
Duration	Duration Uncertainty Reversibility Directness Effect score						
S, M, LT	Н	R	D	+/-			

Parts 1 and 2 of the Local Plan have a heavy focus on development in urban locations which allow for efficient movements and high rates of walking, cycling and public transport, as well as a focus on protecting and enhancing walking, cycling and public transport routes. There is a national trend in the UK of transport becoming increasingly low-emission and the Local Plan would be expected to help facilitate this transition. However, not all new residents would adopt low-emission or sustainable forms of transport and it is expected that the jobs and population growth facilitated by the Plan would lead to a net increase in the number of local people relying on personal car usage for various purposes including commuting to work. This may be a particular risk in Blackpool where the concentrated regeneration and new development in inner urban areas is partially adjacent to the M55.

Cumulative effects on climate change mitigation and air quality							
Duration	Duration Uncertainty Reversibility Directness Effect score						
S, M, LT	S, M, LT H R D -						

A net increase in private car use caused by new residents and workers in Blackpool would be expected to have an adverse impact on local air quality and would exacerbate the Borough's contribution towards the causes of climate change as a result of air pollutants and GHG emissions associated with road transport.

Many of the policies in the Plan would be expected to help ensure that new development in Blackpool is low-emission and energy efficient. The Core Strategy makes provisions for sustainable development and design and incorporates requirements related to energy efficiency and the use of renewable energy. It is somewhat uncertain

the extent to which new developments would be energy efficient or permit low carbon lifestyles as some of the energy efficient standards are encouraged rather than enforced, although major new build residential schemes outside of the inner area would be required to use renewable and/or low carbon energy sources and this would make a major contribution towards reducing the carbon footprint of these developments.

Overall, the Local Plan seeks to deliver significant quantities of new development in Blackpool, much of which is situated on currently vacant land. A cumulative effect of all new residential and economic development in-combination would be a likely net increase in GHG emissions and energy consumption. This impact is likely to be relatively negligible on a site by site basis but, when considered all development sites in-combination, it may make it increasingly difficult to achieve GHG emissions reduction and air quality improvement targets. This may only be avoidable when new development taking place in the Borough is carbon neutral, which is unlikely to take place in the short- or medium-term.

In the centre of Blackpool is an Air Quality Management Area (AQMA). The anticipated rise in local car use could pose a risk to the air quality at the AQMA and make it increasingly difficult to achieve air quality improvement targets here.

	Cumulative effects on climate change adaptation						
Duration	Duration Uncertainty Reversibility Directness Effect score						
S, M, LT	S, M, LT H R D +						

The Local Plan specifically seeks to direct new development away from land at risk of flooding and this is mostly successfully achieved. Given that most new development is situated on brownfield land, there is unlikely to be a significant risk of altering overland flow rates due to replacing permeable surfaces with hard cover. The Core Strategy makes provisions for sustainable development and design, incorporating the use of SuDS.

The potential for the Plan to lead to a net increase in tree canopy would be expected to help protect and enhance the important climate cooling services provided by tree cover.

### **Examination and Main Modifications**

- 2.3.21 The SADMP was submitted to the Secretary of State on 18<sup>th</sup> June 2021. The Examination Hearings were held between 6<sup>th</sup> and 9<sup>th</sup> December 2021.
- 2.3.22 At this time, the Inspector requested the Council to prepare additional evidence relating to employment land supply and delivery over the plan period and exceptional circumstances associated with the Blackpool Airport Enterprise Zone (BAEZ) and the proposed Green Belt release. The Inspector published the Post Hearings Letter (March 2022) which confirmed the Main Modifications required to make the SADMP sound and legally compliant. The main matters considered by the Inspector as part of the Post Hearing Letter related to the BAEZ and the associated Green Belt release. The Inspector found that without the release of land from the Green Belt, for development in the BAEZ in the specific location proposed, critical infrastructure and access improvements could not be achieved, and they advised the following: "... I am satisfied, having considered the evidence, exceptional circumstances exist to justify altering the Green Belt boundaries in respect of the proposed employment and enabling housing development in the BAEZ. However, exceptional circumstances do not exist with regard to the land proposed to be used for recreational purposes". (Par. 8). The Inspector thereby indicated that evidence did not justify other Green Belt alterations other than that which relates to the BAEZ.
- 2.3.23 A total of 44 Main Modifications and 19 Additional Modifications have been proposed by the Council, taking into consideration representation received on the Publication version of the SADMP and the Inspectors' recommendations. The proposed Additional Modifications have also been reviewed and were determined to be very minor amendments which did not need to be re-assessed as part of the SA process.
- 2.3.24 Following the incorporation of the Main Modifications, the contents of the SADMP has altered slightly. Tables 2-5 and 2-6 set out the policies and site allocations of the SADMP and incorporate the Main Modifications. The policies and site allocations that have been removed through the Main Modification process have been highlighted with a 'strikethrough' and policies that have been amended are highlighted in green. Changes to the site allocations are set out in Table 2-6 below, with deleted text signified with a 'strikethrough' and new or amended text 'underlined'.
- 2.3.25 There are no new policies or site allocations proposed through the Main Modifications.

Table 2-5: Policies of the SADMP incorporating Main Modifications

#### **Site Allocations**

Policy HSA1: Housing Site Allocations

Policy MUSA1: Town Centre Mixed Use Site

Policy ASA1: Allotment Site

Policy SLA1: Land Safeguarded for Future Development Needs

#### Housing

Policy DM1: Design Requirements for New Build Housing Developments

Policy DM2: Residential Annexes

Policy DM3: Supported Accommodation and Housing for Older People

Policy DM4: Student Accommodation

Policy DM5: Residential Conversions and Sub-divisions

Policy DM6: Residential uses in the Town Centre

### **Economy**

Policy DM7: Provision of Employment Land and Existing Employment Sites

Policy DM8: Blackpool Airport Enterprise Zone

Policy DM9: Blackpool Zoo

Policy DM10: Promenade and Seafront

Policy DM11: Primary Frontages

Policy DM12: Secondary Frontages

Policy DM13: Betting Shops, Adult Gaming Centres and Pawnbrokers in the Town Centre

Policy DM14: District and Local Centres

Policy DM15: Threshold for Impact Assessment

Policy DM16: Hot Food Takeaways

#### Design

Policy DM17: Design Principles

Policy DM18: High Speed Broadband for New Developments

Policy DM19: Strategic Views

Policy DM20: Extensions and Alterations

Policy DM21: Landscaping

Policy DM22: Shopfronts

Policy DM23: Security Shutters

Policy DM24: Advertisements

Policy DM25: Public Art

### Heritage

Policy DM26: Listed Buildings

Policy DM27: Conservation Areas

Policy DM28: Non-Designated Heritage Assets

Policy DM29: Stanley Park

Policy DM30: Archaeology

### **Environment**

Policy DM31: Surface Water Management

Policy DM32: Wind Energy

Policy DM33: Coast and Foreshore

Policy DM34: Development in the Countryside

Policy DM35: Biodiversity

Policy DM36: Controlling Pollution and Contamination

### Community

Policy DM37: Community Facilities

Policy DM38: Allotments and Community Gardens

Policy DM39: Blackpool Victoria Hospital

Policy DM40: Blackpool and the Fylde College - Bispham Campus

#### **Transport**

Policy DM41: Transport requirements for new development

Table 2-6: Site allocations proposed in the SADMP incorporating the Main Modifications

Site Ref.	Site Address	Site Area (ha)	Existing Land Use	Proposed Use
Residential s	site allocations			
HSA1.1	Former Mariners Public House, Norbreck Road	0.20	Brownfield – vacant plot and car parking spaces	<del>35</del> <u>34</u> homes
HSA1.2	Former Bispham High School & land off Regency Gardens	9.13	Site of the closed down school Bispham High as well as four fields of grass and scrub	176 homes
HSA1.3	Land at Bromley Close	0.22	Greenfield, scrub area	12 homes
HSA1.4	Land rear of 307-339 Warley Road	0.33	Greenfield, scrub area	14 homes
HSA1.5	Land at Chepstow Road/Gateside Drive and land at Dinmore Avenue/Bathurst Avenue, Grange Park	5.5	2 parcels of land, one being 1.4ha of brownfield and the other being approximately 4.1ha of greenfield	<del>160</del> <u>131</u> homes
HSA1.6	Land at Coleridge Road/George Street	0.14	Brownfield – vacant	44 <u>8</u> homes
HSA1.7	190-194 Promenade	0.12	Greenfield, scrub area	15 homes
HSA1.8	South King Street	0.65	Greenfield, scrub area	47 homes
HSA1.9	Bethesda Road Car Park	0.13	Brownfield – parking spaces	13 homes
HSA1.10	Whitegate Manor, Whitegate Drive	0.31	Brownfield – buildings	16 homes
HSA1.11	Land off Kipling Drive	0.27	Greenfield – behind residential properties	14 homes
HSA1.12	Land at Rough Heys Lane	0.67	Greenfield	27 homes
HSA1.13	Land at Enterprise Zone, Jepson Way	1.42	Half brownfield, half greenfield including sports pitch	57 homes
HSA1.14	Site B, Former NS & I Site, Preston New Road	3.31	Brownfield – incomplete development	90 homes
HSA1.15	Land at Warren Drive	3.12	Greenfield	<del>86</del> <u>71</u> homes
HSA1.16	Land at Ryscar Way	2.06	Greenfield	47 homes
HSA1.17	Land at 50 Bispham Road	0.09	Greenfield, scrub area	12 homes
HSA1.18	41 Bispham Road and land to the rear of 39-41 Bispham Road	0.36	Greenfield, scrub area	16 homes
HSA1.19	Kings Christian Centre, Warley Road	0.12	Brownfield – site of demolished derelict church	15 homes
HSA1.20	Land off Coopers Way	<del>1.9</del>	Brownfield residential and vacant	45 homes
HSA1.21	Land at Coleridge Road/ Talbot Road	0.29	Brownfield vacant. Site now has permission and is under construction.	25 homes
HSA1.22	7-11 Alfred Street	0.04	Brownfield – vacant furniture showroom building	14 homes
HSA1.23	Foxhall Village Phases 2(S), 3 & 4	2.97	Brownfield – partially completed development	192 homes, 190m2 commercial/community space
HSA1.24	Site A, Former NS & I Site, Preston New Road	5.11	Brownfield – incomplete development	83 homes

Site Ref.	Site Address	Site Area (ha)	Existing Land Use	Proposed Use
HSA1.25	Site of Co-operative Sports and Social Club, Preston New Road	1.57	Brownfield – incomplete development	4 <del>5</del> <u>22</u> homes
HSA1.26	9-15 Brun Grove (Blackpool Trim Shops)	0.17	Brownfield – parking and building	10 homes
HSA1.27	Waterloo Road Methodist Church, Waterloo Road	0.14	Brownfield – old church building	12 homes
HSA1.28	Land at 200 210 Watson Road	0.89	Brownfield vacant plot	<del>39 homes</del>
HSA1.29	585 – 593 New South Promenade and 1 Wimbourne Place	0.40	Brownfield – vacant buildings	88 homes
Employment	site allocations			
DM7	Blackpool Airport Enterprise Zone	<del>16.1</del> <u>14.15</u>	Brownfield in an commercial/ industrial/ business focussed area	B2, B8, E(g)
DM7	Vicarage Lane	0.2	Brownfield in an commercial/ industrial/ business focussed area	B2, B8, E(g)
DM7	Clifton Road	2.5	Brownfield in an commercial/ industrial/ business focussed area	B2, B8, E(g)
DM7	Preston New Road	0	Greenfield – residential gardens	E(g)
DM7	Chiswick Grove	0	Brownfield in an commercial/ industrial/ business focussed area	B2, B8, E(g)
DM7	Mowbray Drive	0.3	Brownfield in an commercial/ industrial/ business focussed area	B2, B8, E(g)
DM7	Devonshire Rd / Mansfield Rd	0	Brownfield in an commercial/ industrial/ business focussed area	B2, E(g)
DM7	Moor Park	0	Brownfield in an commercial/ industrial/ business focussed area	B2, B8, E(g)
DM7	North Blackpool Technology Park	2	Brownfield in an commercial/ industrial/ business focussed area	B2, E(g)
DM7	Warbreck Hill	0	Brownfield in an commercial/ industrial/ business focussed area	E(g)(i)
Mixed Use s	ite allocation			
MUSA1	Land at Church Street (former Syndicate site)	0.24	Brownfield – car parking	Mixed use including discount food retailer and multi storey car park.
Allotment sit	e allocation			
ASA1	Land to the north of the Golf Driving Range	1.4	Greenfield	Allotments

2.3.26 The assessment of the Main Modifications is presented in the SA Addendum. The proposed Main Modifications are considered necessary for soundness but would not alter the overall vision for Blackpool compared to the aim of the approach of the Publication SADMP and assessed through the Publication SA Report.

- 2.3.27 There are no reasonable alternatives for the Council to consider to the Main Modifications as they were proposed by the Inspector or required to reflect changes that have occurred since the Publication SADMP. Alternatives to these proposed Main Modifications are not considered reasonable, as alternatives have the potential to result in the SADMP being found to be unsound.
- 2.3.28 The proposed Main Modifications have primarily been procedural changes to take into consideration the recommendations from the Inspector following the Examination Hearings and the representation received during the consultation period, such as changes to policy wordings, explanatory text and proposals maps which are considered necessary to demonstrate soundness of the SADMP. Amendments to the SADMP also seek to provide further clarity to policies and reduce repetition. The proposed Modifications include the deletion of four site allocations (HSA1.20, HSA1.21, HSA1.24 and HSA1.28), the reduction in the number of dwellings proposed at five sites (HSA1.1, HSA1.5, HSA1.6, HSA1.15 and HSA1.25) and amendments to Policy DM7 to reflect a reduction in available land for employment development at the BAEZ.
- 2.3.29 The amendments to the policies further support the positive benefits previously identified in the SA by providing further clarification. The Main Modifications would not be expected to significantly alter the scores identified for each SA Objective. Overall, the proposed Main Modifications have led to positive clarifications for the SADMP policies, even though the overall cumulative effects have not altered.

### 2.4 Monitoring

2.4.1 The SEA Regulations require that the plan is monitored to test the actual significant effects of implementing the plan against those predicted through the assessment. This process helps to ensure that any undesirable environmental effects are identified, and remedial action is implemented accordingly. Based on the assessment conducted on the options and identification of potential significant environmental effects, a monitoring framework has been prepared and is presented in Chapter 5 of this report.

### 2.5 How the findings of the SA have been taken into account

- 2.5.1 The SA Reports have appraised spatial, strategic, development management and site policy options throughout the plan-making process.
- 2.5.2 The SA of the SADMP has been an iterative process of collecting information, defining alternatives, identifying environmental effects, developing mitigation measures and revising proposals in the light of predicted environmental effects. Mitigation involves putting in place measures to prevent, reduce or offset any identified adverse sustainability effects. Measures may also include recommendations for enhancing positive effects. The first priority should, however, be avoidance of adverse effects. Only when all alternatives that might avoid an adverse effect have been exhausted, should mitigation be sought to reduce the harmful effect.
- 2.5.3 Incorporated within the assessment tables for all policies and site allocations of the SADMP is a box of recommendations. Within this, the SA has provided recommendations for avoiding, mitigating or enhancing effects. Over the course of the SA process the Council has reviewed these recommendations and, in some cases, incorporated them into the Plan in order to enhance the sustainability of options.

- 2.5.4 The SA has recommended the following measures to the Council, which have been incorporated into the SADMP:
  - Ecological surveys of some sites may be appropriate prior to development being granted permission as the sites contain existing structures such as trees or hedgerow and could potentially be of a high biodiversity value;
  - Where development proposals incorporate green infrastructure elements, the proposals should demonstrate how this green infrastructure would be comprised of a diverse range of native species (where feasible) and how it is connected to the green infrastructure and ecological network extending throughout the Borough and beyond into neighbouring authorities. This measure, which has been incorporated into Policy DM21: Landscaping, would be expected to make a meaningful contribution towards conserving and enhancing the connectivity of the ecological network in Blackpool, helping to enable the free and safe movement of wildlife, and reducing the risk of isolated or island habitats;
  - The SADMP makes a relatively efficient use of land with a significant portion of development directed towards previously developed land. Where development is allocated for previously undeveloped land a permanent loss of ecologically and potentially agriculturally valuable soils is likely. In such cases, proposals should demonstrate that they will adopt best practice measures for sustainable soil management during the construction phase in order to avoid any unnecessary excavation, erosion, contamination, or compaction of soils. Where possible, proposals should seek to enhance environmental conditions. This measure, which has been incorporated into Policy DM36: Controlling Pollution and Contamination, would be expected to help preserve soil stocks in Blackpool, which would subsequently help to preserve the various ecosystem services the Borough's soil provides including carbon storage, nutrient cycling, biodiversity enhancement, flood risk alleviation and water filtering; and
  - The SA has recommended that proposals should demonstrate that materials used for development are, wherever possible, re-used, recycled, re-usable and recyclable. The Council have incorporated this into Policy DM17: Design Principles. The construction industry is a significant consumer of raw materials and generator of waste, much of which is not re-recycled. This measure would be expected to help minimise this and to enhance the sustainability of the construction development allocated in the SADMP.

# 3 How the opinions of the Consultation Bodies have been taken into account?

### 3.1 Consultation on the SADMP

3.1.1 The development of the SADMP has been informed by ongoing public engagement and consultation, in accordance with the Town and Country Planning Regulations. Table 3-1 sets out the key consultations that took place during the SADMP's development.

Table 3-1: Local Plan documents and where to find them

SADMP Documents	Where to find them	Consultation held
Regulation 18 Scoping Document	Blackpool Council planning policy   Local plan   Site allocations (blackpool.gov.uk)	12 <sup>th</sup> June to 24 <sup>th</sup> July 2017
Informal consultation paper, February 2019	Blackpool Council planning policy   Local plan   Site allocations (blackpool.gov.uk)	Close 21 <sup>st</sup> February 2019
SADMP publication consultation (Regulation 19) January 2021	Blackpool Council planning policy   Local plan   Site allocations (blackpool.gov.uk)	19 <sup>th</sup> February to 2 <sup>nd</sup> April 2021
Main Modifications to the SADMP	Blackpool Council planning policy   Local plan   Site allocations (blackpool.gov.uk)	27 <sup>th</sup> July to 7 <sup>th</sup> September 2022

### 3.2 Consultation on SA Reports

3.2.1 The SA Reports that have been prepared, and where they can be accessed online, are set out in Table 3-2. This also includes reference to where further information on responses to each consultation are recorded and how opinions of the consultation bodies have been taken into account.

Table 3-2: SA Reports and where to find them

SA Reports	Where to find them
SA Scoping Report March 2017	FINAL SA Scoping Blackpool LP Part 2 FINAL 27-03-17 (blackpool.gov.uk)
Regulation 19 SA Report November 2020	Blackpool Publication SA Main Report_November 2020 COMBINED (blackpool.gov.uk)
Submission SA Report April 2021	SD005 Sustainability Appraisal Update Apr 21 (blackpool.gov.uk)
Sustainability Appraisal Addendum: Main Modifications July 2022	Sustainability Appraisal Addendum Main Modifications July 2022 (blackpool.gov.uk)

3.2.2 The opinions expressed throughout the consultation outlined above have informed the scope of the SA, helping to in turn shape the development of the SADMP.

# 4 The reasons for choosing the adopted SADMP in light of the reasonable alternatives considered

### 4.1 Overview

- 4.1.1 SEA Regulation 12 (2) requires that "an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated".
- 4.1.2 Information to be provided includes "an outline of the reasons for selecting the alternatives dealt with" (SEA Regulations Schedule 2 (8)) and an overview of types of alternatives considered (development scenarios, site allocations etc.).
- 4.1.3 In 'R (on the application of Friends of the Earth England, Wales and Northern Ireland Ltd) v Welsh Ministers [2015] Env LR 1', Hickinbottom J found the following, with regards to reasonable alternatives:
  - "iv) "Reasonable alternatives" does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.
  - v) Article 5(1) refers to "reasonable alternatives taking into account the objectives... of the plan or programme...". "Reasonableness" in this context is informed by the objectives sought to be achieved. An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan, is not a "reasonable alternative". An option which will, or sensibly may, achieve the objectives is a "reasonable alternative". The SEA Directive admits to the possibility of there being no such alternatives in a particular case: if only one option is assessed as meeting the objectives, there will be no "reasonable alternatives" to it.
  - vi) The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process".

# 4.2 Appraisal of Alternatives and Justification of Preferred Approach

4.2.1 The Council has identified a preferred approach in the SADMP comprising 42 DM Policies (see Table 2-5) and numerous site allocations (see Table 2-6). Arriving at these proposals set out in the SADMP has been a robust, lengthy and evidence-led process, including an iterative relationship between the Plan-making and SA to enable the Council to factor the sustainability performance of options into their decision making.

- 4.2.2 The SADMP has been informed by responses received from stakeholders during the Regulation 18 Scoping consultation held during the summer of 2017 as well as the informal consultation held in early 2019. It has also been guided by various evidence studies and supporting documents, including the accompanying SA and HRA<sup>11</sup>.
- 4.2.3 Crucially, the development management policies in the SADMP conform with Government policy; conform with the Plan strategy adopted through the Plan Part 1; would enable the local development needs, including the housing requirement, to be met; are focussed on achieving socially, environmentally and economically sustainable development in Blackpool; tackle key local issues; and are proportionate and manageable. The Council has considered that any alternative to this approach would risk making the Plan discordant with the Plan Part 1, discordant with national planning policy, fail to satisfy Blackpool's housing need or lead to unsustainable development, and therefore would not be reasonable. The Council has therefore not considered reasonable alternatives to the proposed DM policies.
- 4.2.4 Blackpool has a challenging housing market, rooted in the town's changing fortunes as a major UK seaside holiday resort. The decline in overnight visitors has resulted in the conversion and subdivision of a significant number of holiday accommodation premises to permanent residential use. There is a significant oversupply of poor-quality flats and Houses in Multiple Occupation (HMOs) in the inner areas in building stock that is in need of investment and renewal. This has resulted in a dysfunctional and unbalanced housing supply despite the housing stock outside of the inner areas being of a generally better standard, comprising predominantly semi-detached and terraced housing. Overall, Blackpool has an oversupply of smaller properties, a limited choice of larger properties suitable for family occupation and a significant demand for good quality affordable housing.
- 4.2.5 Core Strategy Policy CS2 sets out the housing requirement for Blackpool over the period 2012 2027 and was adopted in January 2016. It sets out that provision will be made for the delivery of 4,200 (net) new homes between 2012 and 2027. A significant proportion of the 4,200 new homes required have already been built or have planning permission. Policy CS2 also states that new homes will be located on:
  - Identified sites within the existing urban area, including major regeneration sites;
  - · Identified sites within the South Blackpool Growth area; and
  - Windfall sites.
- 4.2.6 Through the SADMP the Council has sought to allocate all reasonable sites in the Borough where these homes could be located. For sites to be reasonable, they would need to be viable, available, deliverable, achievable, relatively sustainable (e.g. not within a SSSI) and would need to conform with the Plan strategy set out in the Plan Part 1. Whilst very small sites make a valuable contribution towards Blackpool's housing supply, it is not considered practical to allocate them for housing in the SADMP. Instead, these sites will contribute towards the housing supply through the windfall allowance. For the purposes of housing allocation in the SADMP, a minimum site size threshold of ten units has been used, which accords with the site size threshold in Planning Policy Guidance.
- 4.2.7 A formal 'Call for Sites' exercise was undertaken at the same time as the SADMP: Regulation 18 consultation during summer 2017. This was targeted at everybody on the Council's Local Plan database. The 'Call for Sites' process remained open beyond the summer of 2017 and the Council encouraged the submission of sites with development potential for consideration for allocation in the

<sup>&</sup>lt;sup>11</sup> Available: https://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning-policy/Blackpool-local-plan/Site-allocations-and-development-management-policies.aspx [Accessed: 09/02/23]

- SADMP. In addition, existing employment sites and allocations have been considered in terms of their potential for re-use for housing. However, the Core Strategy identified a shortfall in employment land supply in Blackpool.
- 4.2.8 The NPPF requires local authorities to take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including sites held in public ownership. Reflecting national policy, the Council has been proactive in the selection of sites and has identified land in both public and private ownership for potential allocation. Vacant and derelict land and buildings and additional opportunities in established uses have also been considered as part of the process.
- 4.2.9 A filtering exercise was undertaken on all sites to eliminate any sites that were not suitable for development. Additionally, sites that were not capable of delivering five or more dwellings, including the smallest SHLAA sites, were also eliminated. The 'Call for Sites' resulted in the submission of a number of potential housing sites on land outside of the existing urban area at Marton Moss, which is subject to Core Strategy Policy CS26. A neighbourhood planning approach is being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the area's distinctive character, whilst identifying in what circumstances development, including residential, may be acceptable. Prior to developing a local policy framework through the neighbourhood planning process, Policy CS26 strictly limits development on the remaining lands of the Moss. It does not propose any housing development in this location unless this emerges through the neighbourhood planning process from the community. The Marton Moss Neighbourhood Forum are currently preparing a Neighbourhood Plan for the area. The Marton Moss Neighbourhood Forum submitted their Submission Draft Marton Moss Neighbourhood Plan to the council. Comments were invited on the documents below during the consultation period 17th October to 28th November 2022. Therefore, the site suggestions received on land at Marton Moss are being considered as part of the emerging neighbourhood plan.
- 4.2.10 The remaining sites were assessed by the Council in terms of their availability, suitability and achievability for housing allocation. PPG states that a site is considered available for development when, on best information available there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships. Site suitability has been guided by policies in the Core Strategy, the saved policies in the Local Plan 2001 2016 and emerging plan policy in the SADMP, as well as national policy. PPG states that a site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. It advises that this is essentially a judgement about the economic viability of a site and the capacity of the developer to complete and let or sell the development over a certain period. Policy CS13 in the Core Strategy sets out the Council's approach to residential densities. It sets out that new residential development will be required to make efficient use of land, with an optimum density appropriate to the characteristics of the site and its surrounding area. It states that higher densities will be supported in main centres and on public transport corridors.
- 4.2.11 Following this process, the Council was able to propose their preferred site allocations for various types of development in the draft SADMP consulted on in early 2019. This list of site allocations has been refined further to arrive at the site allocations proposed in the Publication version of the Plan. The full set of sites, and reasonable alternatives considered during the Plan making process, have all been assessed to the same level of detail in order to inform the Council's selection process.
- 4.2.12 The Council's approach to reasonable alternatives is considered to be legally compliant in light of the requirements of the SEA Regulations as well as relevant case law.

# 5 Measures to monitor significant environmental effects

- 5.1.1 The SA has identified the likely effects of the SADMP on SA Objectives. An indication of the certainty and timescales of these effects has also been predicted. However, there is a risk that the sustainability effects of the SADMP, including the effects of specific aspects or the cumulative effects of SADMP in-combination, are different to those anticipated due to unforeseen circumstances.
- 5.1.2 The SEA Regulations require that potential significant effects which may occur as a result of the implementation of the strategy be monitored. The SEA Regulations state that: "The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action".
- 5.1.3 It is anticipated that the Council will be monitoring the implementation and effects of the SADMP postadoption to feed into future plan review and revision. Table 5-1 suggest a possible list of indicators that could be considered in developing the SADMP Monitoring Framework.

Table 5-1: Proposed Monitoring Framework

SA Objective	Effect to be monitored	Indicators	Targets (Source)	Frequency
1. Crime	The Plan will be likely to help contribute to a reduction in local rates of crime	<ul> <li>Crime rates per 1,000 of the population for key offences.</li> <li>Number of new developments actively incorporating safety by design principles</li> </ul>	<ul> <li>Reduce the number of wards with LSOAs in the bottom 10% most deprived for crime deprivation (Index of Multiple Deprivation (IMD))</li> </ul>	Every 3 years
2. Education	The Plan will help to ensure new and existing residents have good access to education facilities with capacity, and this will facilitate improvements in local educational attainment	<ul> <li>Skills, qualifications, and GCSE performance of Blackpool's residents</li> <li>Percentage of working age people with no qualifications</li> </ul>	<ul> <li>To increase the percentage of pupils in local authority schools achieving 5 or more GCSEs at grades A*-C or equivalent (source: Blackpool Council Authority Monitoring Reports (AMR)). The Council could potentially aim to achieve levels at or above national levels.</li> <li>Reduce the number of wards with LSOA values in the bottom 10% for educational deprivation.</li> </ul>	Every 3 years
3. Health	The Plan will help to ensure residents have good access to health facilities and can live active and healthy lifestyles	<ul> <li>Percentage of the resident population who consider themselves to be in good health</li> <li>Male and Female life expectancy</li> <li>Number of LSOAs in the bottom 10% for health deprivation and disability</li> </ul>	<ul> <li>Reduce the number of LSOAs in the bottom 10% for health deprivation and disability (IMR)</li> <li>To increase life expectancy to at or above national levels over the plan period (AMR)</li> </ul>	Every 3 years
4. Housing	The Plan will help to ensure housing satisfies the local need	<ul> <li>Number of net completions per annum against the phased housing requirement</li> <li>New build completions by dwelling type</li> <li>New build completions by dwelling size</li> <li>Number of affordable housing completions</li> <li>Total provision of Gypsy/Traveller pitches/plots</li> </ul>	Reduce number of wards with LSOAs in bottom 10% for living environment deprivation (IMD)	Annual
5. Community Cohesion	The Plan would help to ensure residents can access community facilities and that new development avoids harming community cohesion	<ul> <li>Amount (sqm) of new community facilities provided in each neighbourhood</li> <li>Percentage of people in Blackpool who are happy where they live</li> <li>Percentage of people who find it easy to access key local services</li> </ul>	Targets to be established through AMR.	Every 3 years
6. Access	The Plan will help to ensure new and existing residents can access to necessary services and facilities	<ul> <li>Percentage of new residential development within 30 minutes public transport time of a GP, primary school, secondary school, major health centre and employment area/site</li> <li>Number of LSOAs in the bottom 10% most deprived for barriers to housing and services provision</li> </ul>	<ul> <li>To reduce number of wards with LSOAs in bottom 10% for levels of barriers to housing and services (IMD)</li> <li>Ensure that there is at least one 20ha natural green space site within 2km of people's homes (as per Lancashire County Council and in line with Natural England's 'Nature Nearby')</li> </ul>	Every 3 years

SA Objective	Effect to be monitored	Indicators	Targets (Source)	Frequency
7. Economic growth	The Plan will be likely to encourage economic growth, higher employment rates and the formation of new businesses.	<ul> <li>Economic activity rate</li> <li>Employment by sector</li> <li>Number of VAT registered businesses</li> <li>Visitor numbers and tourist revenue data</li> </ul>	To diversify the local economy and attract more skilled jobs (AMR)	Every 3 years
8. Tourism	The Plan will be likely to help support and improve the local tourism industry.	<ul> <li>The number of tourists per year in Blackpool.</li> <li>Amount (sqm) of completed leisure development over 500m2 by location</li> <li>Amount (sqm) of new visitor accommodation by location</li> <li>Number of visitors to the resort</li> </ul>	<ul> <li>To maintain jobs in the tourism sector</li> <li>To increase the amount of accredited accommodation</li> <li>Contribute towards a 10% increase (6.3 million) in Lancashire's visitor numbers by 2020 (source: Lancashire Visitor Economy Strategy and Destination Management Plan 2016 – 2020).</li> <li>Contribute towards achieving a ratio of 80:20 between day and staying visitors (source: Lancashire Visitor Economy Strategy and Destination Management Plan 2016 – 2020).</li> <li>Targets related to Tourism post-2020 should be updated to reflect the targets set out in the new Lancashire Visitor Economy Strategy and Destination Management Plan</li> </ul>	Every 3 years
9. Economic inclusion	The Plan will make a major contribution towards increasing the number of residents in employment	Economic activity/employment rates of Blackpool's residents	<ul> <li>To reduce number of wards with LSOAs in bottom 10% for employment and income deprivation (IMD)</li> </ul>	Every 3 years
10. Urban renaissance	The Plan will help to improve the vitality and vibrancy of town centres as well as access to public transport in urban areas.	<ul> <li>Amount (sqm) of completed other town centre uses and percentages completed in the defined Town Centre, District Centres and Local Centres</li> <li>The number of areas with LSOA values below 10% for all deprivation areas within the town centre</li> <li>The percentage of residents who travel to work by public transport rather than drive.</li> <li>Town Centre pedestrian flows/footfall</li> <li>State of the Town Centre environmental quality</li> </ul>	To expand the role of Blackpool town centre as the principal retail centre of the Fylde Coast	Every 3 years
11. Market the Borough	The Plan will help to promote Blackpool as a destination for short- and long-term visitors and new residents and to enhance the Borough's image as an attractive place to do business.	<ul> <li>Position of Blackpool Town Centre in the National (UK) retail rankings (linked to the number of national multiple retailers)</li> <li>The number of wards with LSOA values in the bottom 10% for economic deprivation</li> <li>Number of vacant retail units in the Town Centre</li> </ul>	<ul> <li>To expand the role of Blackpool town centre as the principal retail centre of the Fylde Coast</li> <li>To reduce number of wards with LSOAs in bottom 10% for employment and income deprivation (IMD)</li> </ul>	Every 3 years

SA Objective	Effect to be monitored	Indicators	Targets (Source)	Frequency
12. Biodiversity and geodiversity	The Plan will help to enhance the biodiversity value or many brownfield sites in the Borough but there are some greenfield sites where local biodiversity value could be diminished. No significant effects on a biodiversity designation are likely.	<ul> <li>Number of green spaces managed to 'Green Flag' award standard</li> <li>Amount (sqm) of public open space lost to other uses</li> <li>Amount (£) invested in Green Infrastructure and where</li> <li>Percentage of new development providing open space (or developer contributions for off-site provision) in accordance with the Council's approved standards</li> <li>Tree canopy in the Borough</li> <li>Change in the areas and populations of biodiversity importance including: I. Change in the priority habitats and species by type II. Change in the priority habitats and species for their intrinsic value, including sites of international, national, regional and subregional significance</li> <li>Condition of SSSIs</li> </ul>	<ul> <li>Review Management Plan for SSSI/Local Nature Reserve every 5 years. Prepare Management Plans for all Council owned sites of designated conservation value within 5 year (AMR)</li> <li>Ensure that there is at least one 20ha natural green space site within 2km of people's homes (as per Lancashire County Council and in line with Natural England's 'Nature Nearby') (AMR)</li> <li>Achieve consistent net gains in tree canopy. In 2016, the tree canopy of Blackpool was calculated at 4.4%, the second lowest in the UK behind only Fleetwood at 4.3% (which sits just north of Blackpool). May require new Tree Canopy Reports prepared by the Council.</li> <li>Achieve steady net increase in total tree canopy in Blackpool.</li> </ul>	Every 5 years
13. Landscape and townscape	New development in Blackpool will help to protect and enhance the townscape character of the Borough.	<ul> <li>Number of Planning Permissions refused on poor design grounds</li> <li>Amount of public realm improved (ha)</li> </ul>	<ul> <li>All development &gt; 1ha to provide open space on site. 24 sqm. open space per person (AMR)</li> </ul>	Every 5 years
14. Cultural heritage	New development in Blackpool will help to protect and enhance the setting of the Borough's historic environment.	<ul> <li>Number of Conservation Areas</li> <li>Number of: I. Listed Buildings II. Locally listed buildings of architectural and/or historic interest</li> <li>Number of Listed Buildings on the 'At Risk' register</li> </ul>	<ul> <li>Protect Conservation Areas from inappropriate development, and seek improvements to the character and appearance of the area wherever possible (AMR)</li> </ul>	Every 5 years
15. Water and flooding	New development in Blackpool would be likely to led to a net increase in the consumption of water. New development is unlikely to alter local flood risk and new residents are likely to be situated away from land at risk of flooding.	<ul> <li>Number of planning permissions granted contrary to the advice of the Environment Agency on flood defence grounds or water quality</li> <li>Compliance with the standards of the EU bathing water directive</li> <li>Number of planning permissions granted that incorporate Sustainable Drainage Solutions (SuDS)</li> <li>Number and type of Sustainable Drainage Systems (SuDS) approved by the SuDS Approval Body (including retro fitted SuDS)</li> </ul>	<ul> <li>Avoid permitting any development contrary to EA advice</li> <li>To achieve compliance with Directive's Guideline Standard at all monitoring points (EU Bathing Water Directive) - maintain annually</li> </ul>	Annual
16. Land resource	The Plan will make a relatively efficient use of land by situating the majority of new development on previously developed land	Proportion of gross completions on Previously Developed Land (PDL) and Greenfield sites	<ul> <li>To reduce the amount of vacant floor space (AMR)</li> <li>Continue to focus on re-using previously developed land (PDL)</li> </ul>	Every 3 years

SA Objective	Effect to be monitored	Indicators	Targets (Source)	Frequency
17. Climate change	The Plan would be likely to lead to an increase in GHG emissions due to the proposed development	<ul> <li>Number of planning permissions granted for developments that incorporate renewable and low- carbon energy into their schemes</li> <li>Total carbon dioxide (CO<sub>2</sub>) emissions per capita per year</li> </ul>	Reduction of UK carbon emissions by at least 26% by 2020 and at least 80% by 2050, compared to 1990 levels	Every 3 years
18. Air quality	The Plan could contribute towards a reduction in air quality in some locations of the Borough due to an increase in local congestion.	<ul><li>Number and distribution of AQMAs</li><li>Combined Air Quality</li></ul>	<ul> <li>To reduce the percentage of journeys made by private car</li> <li>To ensure no new AQMAs needed</li> </ul>	Every 3 years
19. Energy	The Plan could help to ensure new development is relatively energy efficient and that there is an increasing generation and use of renewable energy	<ul> <li>Number of new non-residential development over 1,000m² completed to BREEAM 'very good' standard or above</li> <li>Number of renewable and low carbon energy generation schemes installed and operational</li> <li>Annual average domestic gas and electricity consumption per consumer</li> </ul>	<ul> <li>Reduction of UK carbon emissions by at least 26% by 2020 and at least 80% by 2050, compared to 1990 levels</li> </ul>	Every 3 years
20. Natural resources	The scale of development proposed in the Plan will lead to a net increase in the use of resources	<ul> <li>Number of new non-residential development over 1,000m2 completed to BREEAM 'very good' standard or above</li> <li>Incorporation of secondary and recycled materials in new development projects</li> </ul>	Increase use of secondary and recycled materials in construction	Annual
21. Waste	The scale of development proposed in the Plan could lead to a net increase in the generation of waste sent to landfill	<ul> <li>Levels of composting and recycling achieved.</li> <li>Amount of household waste landfilled</li> </ul>	<ul> <li>Recycle and compost 61% of household waste by 2020 (Lancashire Waste Management Strategy 2008 - 2020)</li> </ul>	Annual
22. Transport	The Plan will help to ensure new and existing residents can travel sustainably to access services, facilities, homes and places of employment	<ul> <li>Percentage of new residential development within 30 minutes public transport time of a GP, primary school, secondary school, major health centre and employment area/site</li> <li>Number and type of transport improvements including extensions and enhancements to cycle and pedestrian routes (length of new dedicated routes)</li> <li>The percentage of residents who travel to work by public transport rather than drive</li> <li>Journey to work by mode</li> </ul>	To reduce the percentage of journeys made by private car	Every 3 years

### 6 Conclusion

- 6.1.1 This report satisfies the requirements of a Post Adoption Statement as per the SEA Regulations. The Blackpool SADMP, at each iteration, has been appraised for its likely significant effects against each of the SA Objectives within the Framework. The SA is a process that has been highly integrated with the development of the SAMDP, involving a close working relationship between the SA team and Council. The SA has provided a structured way of considering the impacts of a wide range of options.
- 6.1.2 The SA is used as a tool for consultation, providing the general public and statutory bodies with a breakdown of how the SADMP has been developed in a way that will ensure that it can contribute to more sustainable development. The consultation, involvement and engagement process has given stakeholders the opportunity to provide feedback and suggestions towards enhancing the overall sustainability of the SADMP.
- 6.1.3 Throughout the process, the SA has provided recommendations which could help avoid or mitigate potential negative effects or enhance positive effects. Recommendations made to the Council have been a key feature of the SA process from its inception. Key recommendations made, and the responses to these, are presented in previous SA Reports and in this document. The Council has proved highly receptive to measures for enhancing the sustainability performance of the SADMP and subsequently made enhancements and amendments throughout.



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