

BLACKPOOL LOCAL PLAN

PART 1: CORE STRATEGY

BLACKPOOL COUNCIL STATEMENT

MATTER 1

LEGAL REQUIREMENTS, DUTY TO CO-OPERATE AND OVERARCHING MATTERS

APRIL 2015

Blackpool Council



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Matter 1 – Legal Requirements, Duty to Co-operate and Overarching Matters

(Policy NPPF1)

Participants: Blackpool BC, Home Builders Federation

Introduction

This Statement has been produced by Blackpool Council to outline its response to the Matters and Questions raised by the Inspector for the Hearings into the Blackpool Local Plan Part1: Core Strategy Development Plan Document (SD001).

The Statements form the main basis for the Council's submission to the Hearings. Where appropriate the Statements draw upon and cross reference to the main sources of information used in the preparation of the Core Strategy. To assist document numbers are referenced where appropriate.

Position of the Council regarding Matter 1

- 1.1 Has the Council satisfactorily discharged its Duty to Co-operate in preparing the plan and does the strategy adequately take account of and respond to the plans, strategies and needs of neighbouring authorities? Is this adequately documented?**
- 1.1.1 The Council considers that it has complied with the Duty to Co-operate in full accordance with section 110 of the Localism Act (2011) and met the objectives contained within paragraphs 178 to 181 of the National Planning Policy Framework and the Town and Country Planning (Local Planning (England) Regulations 2012.
- 1.1.2 The Council's Statement of Compliance with the Duty to Co-operate (DC001) sets out an overview of the co-operation and joint working that the Council has undertaken. The Core Strategy has been prepared through constructive, active and ongoing engagement with Fylde and Wyre Borough Councils and Lancashire County Council and relevant organisations, including close co-operation with infrastructure providers.
- 1.1.3 Table A of the document (page 10) clearly sets out the cross boundary issues where they exist, documenting with whom the Council has collaborated and the policy outcomes. Joint evidence base is highlighted as well as the sub – regional meeting groups and forums that have informed Core Strategy preparation and development.
- 1.1.4 The Statement of Compliance (DC001) was subject to consultation at the time of the Proposed Submission Core Strategy consultation (Regulation 19). No objections were raised to the Statement of Compliance in response to this consultation from 'prescribed bodies' and other key bodies with respect to meeting the requirements of the Duty to Co-operate.

(Specific letters in response to the consultation on the draft Statement of Compliance can be found at Appendix 1 to Document DC001).

(a) Is the August 2013 Memorandum of Understanding between Blackpool, Fylde, Wyre and Lancashire County Councils up to date and still formally agreed?

1.1.5 The August 2013 Memorandum of Understanding (MOU) (DC002) at paragraph 4.8 recognises that the Memorandum will be reviewed and updated as appropriate in recognition that the Duty to Co-operate is an ongoing iterative process.

1.1.6 The August 2013 (MOU) has been updated as of March 2015 and has been formally agreed by the Joint Member and Officer Steering Group (30 March 2015) and recommended to constituent authorities for approval. As Purdah commences on 30 March 2015 the latter approvals will take place post the elections of 7 May 2015.

1.1.7 There are no significant changes in the March 2015 update (refer Appendix A to this Statement) compared to the August 2013 MOU (DC002). The update:

- refreshes the evidence base including referencing the updated Fylde Coast Strategic Housing Market Assessment (December 2013 Published February 2014) and the Fylde Coast Gypsy, Traveller and Travelling Showpeople Assessment September 2014;
- refreshes the strategic issues, refining the wording particularly relating to housing and transport matters. With respect to the latter, to more closely align with the Fylde Coast Highways and Transport Masterplan;
- refreshes the governance arrangements; and
- includes some minor textual changes to improve clarity.

(b) In the context of a jointly prepared SHMA for the Fylde Coast is there an obligation on Blackpool to ensure that the minimum indicated figure for objectively assessed housing need in the Fylde Coast area as a whole is met, notwithstanding statements from the partner authorities that they do not need to rely on Blackpool to help meet their housing needs?

1.1.8 The objectively assessed housing need (OAN) for the Fylde Coast is set out in the Fylde Coast Strategic Housing Market Assessment (SHMA) published February 2014 (EB004) and SHMA Addendum (November 2014) (EB005). These documents have provided evidence for the Blackpool, Fylde and Wyre Councils as to how many dwellings of different tenures may be needed over the next 15 years and beyond in their respective areas. The approach undertaken in the SHMA conforms with the requirements of paragraph 159 of NPPF and PPG section ID2a, which sets out what Local Authorities need to do to have a clear understanding of the housing needs in their area.

- 1.1.9 The Blackpool Local Plan Part 1: Core Strategy (SD001) sets out the housing target as 280 new dwellings per annum between 2012 and 2027. This figure lies above the minimum OAN for Blackpool in the SHMA (published February 2014) which is assessed as being 250. The reasoned justification for the Council proposing a figure of 280 new dwellings is set out in the Blackpool's Housing Requirement Technical Paper June 2014 (EB003).
- 1.1.10 Paragraph 47 of NPPF states that '*...local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area...*'. Paragraph 007 in the Approach to Assessing Need section of the PPG states that 'Local planning authorities should assess their development needs working with the other local authorities in the relevant housing market area or functional economic market area in line with the duty to cooperate'. In taking forward the recommendations in the SHMA and finalising Blackpool's housing requirement Blackpool Council is meeting its own OAN for new housing in full and has co-operated with neighbouring authorities in defining this target. There is no evidence to indicate neighbouring authorities cannot accommodate their own needs, so the Council is of the view that there should be no obligation on Blackpool to ensure that the minimum indicated figure for objectively assessed housing need in the Fylde Coast area as a whole is met. The Council is not in a position to ensure that Fylde and Wyre Councils meet the minimum indicated figure for their authorities as set out in the SHMA and as stated above there is no evidence that they are unable to.
- 1.1.11 With respect to meeting the minimum indicated figure for OAN, both Fylde and Wyre Borough Councils are not at as an advanced stage of their Local Plan preparation as Blackpool Council and have yet to set out in the next stage of their plans a definitive housing requirement figure. That said both authorities have published Decisions on the SHMA (December 2013) published February 2014 and the SHMA Addendum (November 2014) accepting these documents as evidence to inform their local plans and that the Local Plans for both authorities will be progressed on the SHMA findings to formal public Consultation in 2015. This provides a clear commitment by both authorities to meeting the minimum indicated figure for OAN as set out in the SHMA.
- 1.1.12 The Council considers therefore that it is meeting the requirement of paragraph 47 of the NPPF together with paragraph 007 of the PPG on assessing housing need, as Blackpool is meeting in full its share of the housing market area OAN as established in the SHMA and SHMA Addendum. In the absence of any evidence to suggest Blackpool should be accommodating additional need from elsewhere in the Fylde Coast, there is no reason to believe that Blackpool's approach will undermine the ability of the three authorities to meet the needs of the housing market area in full. More information on this is set out in Section 7 of Blackpool's Housing Requirement Paper (EB003).

(c) Do the Core Strategy proposals in respect of new comparison shopping floorspace in Blackpool appropriately align with the evidence concerning the Fylde Coast as a whole? (see also Matter 4)

- 1.1.13 The Core Strategy proposals in respect of new comparison shopping floorspace in Blackpool are considered to appropriately align with the evidence concerning the Fylde Coast as a whole.
- 1.1.14 Policy CS4 along with policies CS1 and CS17 have been informed by the findings of the Joint Fylde Coast Retail Study 2011 and Appendices (EB010); work undertaken on the Blackpool Town Centre Strategy; and policy in the National Planning Policy Framework. The Fylde Coast Retail Study (FCRS) provides a quantitative and qualitative assessment of the key towns and centres across the Fylde Coast and provides an assessment of options and recommended strategy for improving the Fylde Coast's sub-regional offer (EB010 page 93 to 99). It also establishes the hierarchy of centres within the study area of which Blackpool is the sub-regional centre for the Fylde Coast and centres within Fylde and Wyre are at a lower level in the retail hierarchy. The study highlights that Blackpool Town Centre is underperforming as a sub-regional centre and that in the interests of the Fylde Coast sub-regional as a whole that Blackpool Town Centre's position as a strong sub-regional centre should be restored thereby reducing the unsustainable leakage of expenditure that currently flows to out of centre locations within the Fylde Coast and to competing centres outside the Fylde Coast.
- 1.1.15 An update of the 2011 FCRS was commissioned by Fylde Borough Council and Wyre Borough Council in September 2013. The purpose of this report was to address quantitative issues and to extend the study period to 2030 (the end of the current development plan period for the two authorities). These revised figures are to be used to update the distribution of floorspace requirements within the centres of the two authorities.
- 1.1.16 The 2011 FCRS provided three forecasts of the quantitative need for additional comparison goods floorspace (paragraphs 6.37 and 6.38) – a 'Static Retention' scenario, whereby current shopping patterns remain unchanged over the course of the period to 2026 (i.e. the current retention rate of 75 per cent stays the same), a 'Moderate Increase in Retention' scenario, whereby a modest increase in the retention rate from 75 per cent to 80 per cent is achieved by 2026, and a 'Significant Increase in Retention' scenario whereby a more significant increase in the retention rate from 75 per cent to 82 per cent is achieved by 2026. The conclusion reached in the FCRS was that there was justification to plan for a moderate increase in the retention level, so as support the performance of Blackpool Town Centre as the sub-regional centre for the Fylde Coast and to reduce the level of unsustainable shopping trips to destinations beyond the catchment area.
- 1.1.17 However, in updating figures for Fylde and Wyre, the consultant reconsidered the approach to retention rates. The 2013 Update is therefore presented on the basis of static retention rates for convenience and comparison goods expenditure. The 2011 FCRS distributed comparison floorspace requirements on the basis of a moderate increase in retention rates

from 75 per cent to 80 per cent. The consultants considered the static retention scenario to be more robust for the case of the lower order centres in Fylde and Wyre given that the higher order centres of Preston and Lancaster will continue to draw trade from the sub-region and that parts of the boroughs of Fylde and Wyre clearly fall within the established catchment areas of these centres. The moderate increase in comparison goods expenditure retention envisaged by the FCRS was intended to support Blackpool Town Centre. This consideration is less relevant to updating floorspace requirements for Fylde and Wyre where centres would not necessarily benefit from increased retention as a result of improvements to Blackpool's offer.

1.1.18 As far as Blackpool Council are concerned, the modest rate of retention is the most appropriate approach for Blackpool Town Centre with the identified need to reduce the level of unsustainable shopping trips to destinations beyond the catchment area. The approach recognises the need for Blackpool Town Centre to increase its market share within the Fylde Coast sub-catchment, thereby clawing back some of the expenditure which is currently being lost to competing destinations. The Core Strategy policy supports this approach to strengthen Blackpool Town Centre's role as the sub-regional centre for the Fylde Coast, improving its vitality and viability by focussing new retail development on the town centre to strengthen the retail offer and improve the quality of the shopping experience.

1.1.19 As and when appropriate, the Retail Study will be updated to inform the future preparation of Local Plan Documents.

(d) Do the Core Strategy proposals in respect of South Blackpool Growth and Enhancement appropriately align with, but not prejudice, those emerging in Fylde and Wyre boroughs? (see also Matter 8)

1.1.20 Chapter 8 of the Blackpool Core Strategy (CD001) sets out the policy approach to South Blackpool Growth and Enhancement recognising the important role this area has to play in strengthening the local economy and contributing to rebalancing the housing offer, (refer Figure 18 Core Strategy (page 107)).

1.1.21 In economic terms, Policy CS24 supports the redevelopment of existing employment sites as well as proposals for major new business and industrial development in principle at sustainable locations including Blackpool Airport Corridor and lands close to Junction 4 of the M55. As highlighted in Figure 18 of the Core Strategy and supporting text on pages 109-110, these locations include existing employment sites within Blackpool at Squire Gate Industrial Estate; Blackpool Business Park; Preston New Road and Clifton Road Sites. In addition there is recognition of the importance of employment land at Whitehills in Fylde Borough to supporting the growth of the sub-regional economy of the Fylde Coast.

1.1.22 The Core Strategy evidence base (Employment Land Technical Paper June 2014 (EB011) and Employment Land Study June 2014 (EB012)) identifies lands on the Blackpool/Fylde

boundary as the most appropriate locations to attract major new economic development providing sustainable jobs for Fylde Coast residents and supporting sub-regional employment growth.

1.1.23 Blackpool Council is working jointly with neighbouring authorities Fylde and Wyre to promote sustainable locations within South Blackpool, to support business and industrial growth for Blackpool and the Fylde Coast sub-region. This is to ensure that development in the area will support the strategic objectives set out in each authority's Local Plan.

1.1.24 Co-operating on economic issues and employment land requirements is embedded in the Memorandum of Understanding (MOU) to ensure alignment of proposals in each local plans. In particular the MOU (DC002 page 9) identifies the strong links between the Fylde Coast Authorities in term of travel to work patterns and employment and highlights that crucial to economic growth is the provision of quality development sites to support new business, capitalising on particular assets, strengths and opportunities of the sub-regional as a whole.

1.1.25 The following are highlighted in MOU as key issues:

- To undertake joint consideration of future employment development for the sub-region in response to the strong links between the FCAs in terms of travel to work patterns and employment;
- To work together to agree the sub-regional employment land requirement;
- To work together to agree the strategic priorities for land around junction 4 of the M55 – Fylde/Blackpool boundary with the aim of attracting major new economic development to help strengthen the Fylde Coast economy;
- To work together to promote the sustainable development of the following key strategic sites/corridors:

- Blackpool Airport corridor – Blackpool/Fylde boundary;
- The Enterprise Zone at BAE Systems – Warton – Fylde;
- Land at Thornton – Cleveleys (Hillhouse) – Wyre;
- Central Business District – Blackpool Town Centre;
- Whyndyke Farm – Fylde/Blackpool boundary
- A6 Corridor/Garstang Wyre

1.1.26 In terms of housing policy in South Blackpool, Policy CS26 identifies land at Whyndyke Farm (Mythop Road) and land at Moss House Road to provide around 750 new dwellings. Planning permission has been granted for around 600 dwellings at Moss House Road and land at Mythop Road (Blackpool) forms a small part of the much larger Whyndyke site, the majority of which lies in Fylde. The two authorities are currently co-operating in consideration of a major mixed use application on Whyndyke for 1500 dwellings and around 20 hectares of business and industrial use to ensure the proposals aligns with the Blackpool Core Strategy and emerging policy in the Fylde Local Plan.

- 1.1.27 The last iteration of the Fylde Local Plan that was formally consulted upon was Part 1 - Preferred Options (summer of 2013). This document identifies strategic locations for development on lands in Fylde on the Blackpool periphery including Whyndyke for mixed use (housing and employment) and land at Whitehills and Blackpool Airport for employment use. This aligns with the proposals and policy in the Blackpool Core Strategy. Whilst Fylde Borough Council are currently revisiting their housing requirement figures, the strategic importance of lands on the Blackpool/Fylde boundary for housing and employment remains inherent in the planning approach being adopted by Fylde and is confirmed by the updated MOU.
- 1.1.28 Responses from Fylde and Wyre Borough Councils to the Blackpool Core Strategy Proposed Submission consultation raised no objection to the proposals and policies set out in the document with regard to South Blackpool Growth and Enhancement. Copies of Fylde and Wyre's representations are contained in Submission Document SD011¹. Fylde Borough Council state that it is not considered necessary to raise any objection to the Core Strategy and that their response includes points of clarification and correction of factual inaccuracies to improve clarity without altering the substance of proposals in the plan. Similarly Wyre Borough Council makes observations which also include points of clarification and corrections to improve clarity. Neither authority raises any substantive issues regarding the policies and proposals in the Core Strategy.
- 1.1.29 Blackpool Council has responded to the points raised by both authorities and has proposed minor modifications to text to address the issues raised where appropriate (refer Schedule of Minor Modifications (SD003) and Summary of Representations (SD010 page 29 onwards).
- 1.1.30 In particular, with respect to Fylde Borough's comments relating to Chapter 8 – South Blackpool Growth and Enhancement, paragraphs 8.3 and 8.7 - a minor modification is proposed to address the issue raised; and with respect to paragraph 8.16 proposed minor modifications (MM030) removes the reference to 14 ha of employment land close to Junction 4 of the M55, so as not to prejudge the location in Fylde Borough of Blackpool's 14 ha shortfall of employment land which Fylde Borough Council has agreed to accommodate. Confirmation to accommodate Blackpool's shortfall of 14 ha is in the Statement of Compliance with the Duty to Co-operate (DC001 – Appendix 1)).
- 1.1.31 With respect to Wyre Borough Council whilst raising no substantive issues in their representation, with respect to South Blackpool they observed that policy needs to reflect a range of sub-regional matters that may affect Wyre including transport and highway matters and ensuring that any proposals do not undermine the established Hillhouse International Business Park. With respect to these observations as highlighted previously in this matter, key economic cross boundary issues are set out in the agreed MOU including a commitment to work together to promote the sustainable development of the key strategic sites/corridors across the Fylde Coast, including Hillhouse.

¹ Fylde Borough Council Response Ref 04 – page 7
Wyre Borough Council Response Ref 09 – page 30

1.1.32 Likewise in the MOU and Statement of Compliance transport and highways matters are identified as cross boundary issues and the three authorities and LCC are cooperating on these issues in particular through the development of the Fylde Coast Highways and Transport Masterplan.

1.2 Does the plan adequately provide for mitigation against significant adverse environmental, social and economic effects and is this adequately and accurately addressed in the Habitats Regulations Assessment and the Sustainability Appraisal (SA)?

1.2.1 The Habitats Regulations Assessment (HRA) (SD007) has assessed the impact of the Core Strategy on Natura 2000 sites from all development proposed in the Core Strategy. A HRA has been undertaken at various stages of the Core Strategy with the Council making amendments to the plan in line with any recommendations. The overall outcome of the HRA for the Core Strategy Proposed Submission (SD007) was that there were no requirements for an Appropriate Assessment of any of the Core Strategy policies.

1.2.2 A number of Sustainability Appraisals have been undertaken during the preparation of the Core Strategy. These are:

- Sustainability Appraisal of the Local Development Framework Scoping Report (October 2007)
- Assessment of Strategic Options (April 2008)
- Sustainability Appraisal of the Preferred Option (April 2010)
- Sustainability Appraisal of the Revised Preferred Option (May 2012)
- Sustainability Appraisal of the Proposed Submission (May 2014)

1.2.3 The Council has responded to any recommendations and made changes to policies within the plan as appropriate.

1.2.4 The Council's Response to the Proposed Submission Sustainability Appraisal (SD006) outlines the Council's response to the Sustainability Appraisal (SA) undertaken for the Blackpool Core Strategy Proposed Submission. It summarises the SA recommendations and identifies changes made to the document where appropriate. Where the Council does not consider changes are necessary, this is fully justified.

(a) Should the SA consider the full range of figures indicated in the SHMA as the objectively assessed need for housing?

1.2.1 The Council is committed to preparing a Core Strategy that contributes to sustainable development to achieve a balance between economic growth, social progress and environmental quality. Consequently, the SA (incorporating the requirements of the SEA Directive) has been undertaken on the Core Strategy throughout its development to ensure

the principles of sustainable development are inherent throughout the preparation of the plan and that it complies with the relevant planning guidance.

- 1.2.2 Table 1-1 in the SA of the Proposed Submission Core Strategy (May 2014) report demonstrates that a highly iterative approach has been adopted for the development of Blackpool's Core Strategy, with assessments of its sustainability performance having been completed and feedback provided. This is to encourage the selection of the most sustainable options and to ultimately improve the sustainability of the development that is brought forward.
- 1.2.3 A requirement of the SEA Directive is to consider "reasonable alternatives taking into account the objective and the geographical scope of the plan or programme" and to "give an outline of the reasons for selecting the alternatives dealt with".
- 1.2.4 The 2013 SHMA (EB004) identifies Blackpool's objectively assessed needs (OAN) as falling within a range of 250-400 dpa over the period 2011-30. Further analysis to identify an appropriate housing figure within this range is developed and considered in the Housing Requirement Technical Paper (June 2014) (EB003). This paper also considers the impact of delivering high, medium and low housing growth scenarios within the recommended range of OAN on economic, social and environmental change, together with achievement of Local Plan objectives and whether the alternatives are realistic to deliver. A summary of the paper, and the reasons for its conclusions in this regard, is found at 3.4 of the SA (May 2014). It was not necessary therefore for any additional analysis of the figures, over and above this, to be provided in the SA.
- 1.2.5 As 3.4 of the SA explains, by reference to the paper, in considering the benefits and disbenefits of the alternative levels of housing provision, on balance the Council does not believe that the high and low growth alternatives will deliver sustainable development that reflects the needs, vision and aspirations of the local community which are underpinned in the Core Strategy, the current Blackpool Council Plan and in wider economic, housing and health strategies being delivered across Blackpool. As such delivering these alternative levels will not achieve the Local Plan objectives. Detrimental environmental, social and/or economic impacts were also identified. Furthermore in considering constraints to delivery and the geographical scope of the plan they are not considered to be realistic to deliver, which is in conflict with paragraph 154 of the NPPF which requires Local Plans to be aspirational yet realistic. Therefore, for these reasons they are not considered to be reasonable alternatives for the purpose of the SEA Regulations and consequently have not been assessed further in the SA.
- 1.2.6 Only the medium growth scenario of 280 dpa is considered to achieve an optimum balance between each of the economic, social and environmental dimensions of sustainable development, and net gains across all three (paragraph 152 of the NPPF); to meet the Local Plan objectives; and to be aspirational yet realistic and deliverable. This level of housing growth, as proposed in Policy CS2, has been assessed as part of the SA and performs well against the SA objectives:

“Policies CS2 and CS3 ensure that housing targets for 2012 – 2027 reflect the assessed need of the future population, ensure housing targets are realistic to deliver (i.e. take account of market signals and challenging issues associated with viability etc.) and ensure housing growth is aligned to economic prosperity. The latter is considered important in order to address a number of challenges regarding Blackpool’s current housing market and the dynamics of its local economy. All of the above would ensure positive effects against the economic and social SA Objectives.”

1.2.7 Further detail can be found in the 2014 Core Strategy Proposed Submission Sustainability Appraisal report (SD004) as well as pages 34 to 37 of the 2014 Housing Requirement Technical Paper.

(b) Is the HRA Screening Assessment of the Core Strategy satisfactory in respect of Marton Moss?

1.2.8 The Council considers that the HRA Screening Assessment is satisfactory in respect of Marton Moss. Bowland Ecology was commissioned by Blackpool Council to undertake the Habitat Regulations Screening Assessments (HRA) for the Core Strategy. An HRA has been undertaken at various stages of the Core Strategy with the Council making amendments to the plan in line with any recommendations. The overall outcome of the HRA for the Core Strategy Proposed Submission (SD007) was that there were no requirements for an Appropriate Assessment of any of the Core Strategy policies.

1.2.9 The HRA has assessed the impact of the Core Strategy on Natura 2000 sites from all development proposed in the Core Strategy. The HRA makes reference to Marton Moss in Section 3: Recommendations. It states *‘A parcel of land to the South of Blackpool has been identified for the development of a Neighbourhood Plan, which could lead to development in this area. However, impacts of this plan on the Natura 2000 sites will be assessed on production of the Neighbourhood Plan rather than through the Core Strategy’*

1.2.10 HRA screening will be carried out on any proposals that are put forward through a Neighbourhood Plan or within the Site Allocations and Development Management Policies DPD. There is specific reference at Paragraph 8.27 in the supporting text to Policy CS26 Marton Moss that *‘The neighbourhood planning process will need to conserve and enhance the existing natural features and habitats. In particular, any future development must not have a significant impact upon the foraging/ roosting habitat of any of the “Annex 1” listed bird species that visit ‘Natura 2000’ sites (Morecambe Bay and Ribble and Alt estuaries). A biodiversity strategy for Marton Moss will be required to ensure that consideration is given to biodiversity throughout the development process, including appropriate ecological surveys and mitigation measures. In addition, any proposals may require licensed mitigation in accordance with existing best practice and legislative requirements to protect wildlife.’*

1.2.11 Appendix 4 of the HRA provides an assessment of the Core Strategy policies in relation to impact on Natura 2000 Sites. With respect to Policy CS26 Marton Moss, the assessment

highlights the supporting text to the policy which recognises the need for impacts upon Annex 1 bird species and subsequent Natura 2000 sites to be taken into account. However the assessment highlights that any development that may occur will be a result of a neighbourhood planning process rather than at this strategic level.

- 1.2.12 Appendix 3 of the HRA provides a classification between 1 and 9 of the potential impacts upon Natura 2000 sites. Classifications 1-7 set out the reasons that a policy will have no effect on a European Site. Classification 8 sets out the reasons why a policy could have a *potential* impact and Classification 9 sets out why a policy would be likely to have a *significant* affect. Policy CS26: Marton Moss has been classified as 2 and details that the policy makes provision for a quantum/type of development but the location of the development is to be selected following consideration of options in recognition that development will be determined in lower tier plans.
- 1.2.13 HRA screening will be carried out on any proposals that are put forward through a Neighbourhood Plan or within the Site Allocations and Development Management Policies DPD.
- 1.2.14 In further correspondence(see Appendix B), Natural England has confirmed that, subject to a further modification, the HRA Screening Assessment of the Core Strategy is satisfactory in respect of Marton Moss. A further modification of the supporting text to policy CS26 is therefore proposed to provide additional clarification:

8.27 The neighbourhood planning process will need to conserve and enhance the existing natural features and habitats. In particular, any future development must not have a significant impact upon the foraging/roosting habitat of any of the “Annex 1” listed bird species that visit ‘Natura 2000’ sites (Morecambe Bay and Ribble and Alt estuaries). **A Habitats Regulations Assessment will be undertaken as part of the neighbourhood planning approach to ensure that there no likely significant effects on designated sites.** A biodiversity strategy for Marton Moss will **also** be required to ensure that consideration is given to biodiversity throughout the development process, including appropriate ecological surveys and mitigation measures. In addition, any proposals may require licensed mitigation in accordance with existing best practice and legislative requirements to protect wildlife.

(c) Is the HRA Screening Assessment clear that the Proposed Submission Core Strategy is unlikely to give rise to significant effects on Natura 2000 sites and thus Appropriate Assessment is not necessary?

- 1.2.14 The Council considers the HRA is clear that the Proposed Submission Core Strategy is unlikely to give rise to significant effects on Natura 2000 sites and that Appropriate Assessment is not necessary. An Appropriate Assessment is required when policies identified at the screening stage potentially have a likely significant effect on a Natura 2000 site.

1.2.15 Appendix 3 of the HRA provides a classification between 1 and 9 of the potential impacts upon Natura 2000 sites. Classifications 1-7 set out the reasons that a policy will have no effect on a European Site. Classification 8 sets out the reasons why the policy could have a potential impact and Classification 9 sets out why the policy would be likely to have a significant affect. The Core Strategy policies are assessed in Appendix 4 of HRA and all receive a classification of between 1 and 8. There are no policies assessed in Appendix 4 that have been classified as a 9 and would therefore require Appropriate Assessment.

1.3 Is it appropriate for the plan to take the form of a Core Strategy and to devolve key matters, including site allocations, to a future Site Allocations and Development Management Policies document? Is there a clear justification for this and does it accord with national policy?

1.3.1 As set out in the NPPF (paragraph 153) and the online resource Planning Practice Guidance (PPG), Government's preferred approach for planning authorities is to prepare a single Local Plan for its area (or a joint document for neighbouring areas). PPG clarifies that while additional Local Plans can be produced, for example a separate Site Allocations or Area Action Plan, there should be clear justification in doing so.

1.3.2 In 2012 following the publication of the NPPF the Council took the decision to progress a two Part Local Plan, Part 1: Core Strategy and Part 2: Site Allocations and Development Management Policies Development Plan Document (DPD). The Core Strategy at this time had progressed to beyond the Preferred Option Stage, the majority of development management policies had been saved in the adopted Local Plan and work had yet to commence to review the saved polices. It was therefore considered that preparing a 2 part plan would enable the Council to bring forward the Council's strategic priorities and key sites without further delay providing a clear direction and increased certainty for developer, investors and the community with regard to future investment and development avoiding further delay in having an adopted strategic planning framework which could potentially undermine key regeneration and development projects. The programme for progression of the Local Plan parts 1 and 2 is set out in the Council's Local Development Scheme (SD014). The aim is to commence the preparation of the Site Allocations and Development Management Policies DPD in the summer of 2015 with Publication Consultation programmed for April/May 2017, Submission to the Secretary of State in October 2017, Examination in February 2018 followed by adoption in June 2018 (SD014 pages 9 – 10).

1.4 Is the plan period (2012 – 2027) soundly based and does it accord with national policy? Should the plan period be extended to 2030 to align with housing forecasts and to allow for a 15 year post-adoption life span?

1.4.1 It is considered that the plan period 2012 – 2027 is soundly based, underpinned by an appropriate and proportionate evidence base. Whilst the updated Strategic Housing Market Assessment covers the period to 2030 other supporting evidence relates to the plan period and the Council therefore considers 2012 to 2027 remains an appropriate time scale for the plan to cover.

1.4.2 The Council's current timetable envisages adoption of the new Local Plan by July 2015. The end date of the Plan (2012) is 31st March 2027. This means that upon adoption it will cover a period of just less than 12 years. This time period still allows sufficient time to secure long term investment in the Borough. The Strategic Housing Land Availability Assessment (SHLAA) (EB007 page 17) shows a reasonable buffer of sites beyond what is required over the plan period. Only around 67% of the 3979 dwellings identified in the SHLAA would need to come forward in the plan period to achieve Blackpool's housing requirement.

1.4.3 In addition The Infrastructure Delivery Plan has been closely developed with infrastructure providers and the level of proposed growth is not dependent on major infrastructure projects for delivery. There is no indication from statutory providers that the infrastructure that is required cannot be delivered in the plan period.

1.4.4 With respect to NPPF and the plan period, the Framework at paragraph 157 does not require the plan period to extend 15 years post adoption. The paragraph states that a plan should *'be drawn up over an appropriate time scale, preferably 15 year time horizon'*. Hence the framework is merely stating a preference as opposed to a specific requirement.

1.5 Has the preparation of the plan empowered local people to shape their surroundings and does it set out a positive vision for the future of the area? Has the plan been derived from an open and transparent process which demonstrates how and why its strategy was selected, in consultation with the public and other stakeholders, in preference to the identified alternative options? Is the plan compliant with:

- (a) the Local Development Scheme?**
- (b) the Statement of Community Involvement?**
- (c) the Public Sector Equality Duty?**
- (d) the 2004 Act and the 2012 Regulations?**

1.5.1 Community and stakeholder engagement has played an important role in the development of the Core Strategy. Consultation was undertaken at various stages which has shaped the development of the various policies in the Core Strategy in accordance with the **2012 Local**

Plan Regulations (and preceding Local Plan Regulations) and the 2004 Planning and Compulsory Purchase Act.

- 1.5.2 At the outset, consultation has taken place to develop Blackpool's key issues, the vision and objectives and the policies to deliver the vision and objectives. The Council arrived at its preferred approach through a transparent process which is set out in various reports that can be found in the appendices to the Statement of Consultation (SD012).
- 1.5.3 All Core Strategy consultations have been in accordance with the current **Statement of Community Involvement** (SD013) and its predecessor (AD023) and the **Local Development Scheme** (SD014) which was updated in June 2014. This is illustrated in the Statement of Consultation (SD012) which provides details of how consultation has taken place during the various stages of the plan preparation. The Statement of Consultation also identifies the representations received during each consultation stage and how these have been considered and incorporated into the plan (if appropriate). The Summary of Representations to Proposed Submission Core Strategy - Regulation 22 (1) (c) (v) Statement (SD010) sets out how consultation took place on the Proposed Submission Core Strategy. It also summarises the representations made to the Proposed Submission and the Council's response to these with links to any minor modifications suggested by the Council where appropriate.
- 1.5.4 The **Public Sector Equality Duty** requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities. An Equality Analysis (SD008) has been undertaken for the Core Strategy to ensure the document takes account of all relevant and appropriate equality considerations. This analysis provides a detailed assessment of the potential implications of the Core Strategy on achieving greater equality for affected groups and documents how these considerations have been incorporated into the evolving proposals and policy content of the Core Strategy.
- 1.6 Do the plan's policies logically flow from Vision and the Strategic Objectives and those in turn from the Spatial Portrait of Blackpool and the Summary of Overarching Issues?**
- 1.6.1 Chapter 2 'A Spatial Portrait of Blackpool' sets out where the borough is today summarising the town's main social, physical and economic characteristics. From the Spatial Portrait, a summary of overarching issues is provided. The Spatial Vision is informed by the Spatial Portrait and sets out where Blackpool aspires to be in 2027. It responds to the key issues and characteristics summarised in the Spatial Portrait.
- 1.6.2 The Spatial Vision is underpinned by four goals. Each goal is supported by a number of strategic objectives. The aim is to achieve these objectives through the implementation of Core Strategy policies. The cross linkages between the objectives and policies are illustrated in Appendix C Table 1 of the Core Strategy which provides a comprehensive table of how each of the Core Strategy policies relates to the relevant goals and objectives.

1.7 Are the Vision and the Strategic Objectives clear, realistic and in accordance with national policy and do they adequately reflect the Blackpool Sustainable Community Strategy?

1.7.1 The Vision and Strategic Objectives are set out in Chapter 3 of the Core Strategy- Proposed Submission (SD001 pages 22-24). The Spatial Vision is underpinned by four goals each supported by a number of strategic objectives. The principle of sustainable development underpins and cross-cuts each of the four goals and objectives and is integral to transforming Blackpool. How the policies in the Core Strategy are linked to the goals and objectives is set out in Appendix C of the Core Strategy. It is the Council's view that the Vision and Strategic Objectives are clear and realistic and that they are in accordance with NPPF.

1.7.2 The Blackpool Sustainable Community Strategy (SCS) 2008-2028(FEB001) was prepared by the Blackpool Strategic Partnership which brought together a wide range of organisations from public, private, voluntary and community sectors. The SCS identified key issues and challenges facing Blackpool and from this set out four defined goals which would help to achieve Blackpool's Vision set out in the SCS. In the Core Strategy Preferred Option (April 2010)(AD013) pages 14-15 refers to the SCS stating that the Core Strategy aligns with the SCS and is supportive of the vision and goals. Further detail is set out in Appendix B of the Preferred Option which aligns the policies in the Core Strategy with the SCS goals.

1.7.3 The intention to repeal the statutory duty on local authorities to prepare a SCS (Deregulation Bill – Clause 54) was announced in April 2011 with Royal Assent received in March 2015. With the appointment of a new administration in Blackpool in May 2011, the SCS was replaced by a new Mission, Vision and Priorities Statement (2012). The vision and nine priorities in the Statement informed the Council Plan 2013-2015² which identifies three key areas – **encouraging ambition and aspiration; improving people's health and well-being; and create a prosperous town.** In developing the Revised Preferred -Option Core Strategy (AD009) the vision and priorities in the Statement were reviewed to ensure the Core Strategy goals and objectives aligned where appropriate as referenced on page 2 of the document (AD009).

1.8 Is a Glossary of Terms necessary to the soundness of the plan?

1.8.1 Whilst it is acknowledged that a glossary can be useful in providing explanation of key planning terms, it is not considered necessary to the soundness of the plan. However, if the

²<https://www.blackpool.gov.uk/Your-Council/The-Council/Council-constitution-and-plans/Council-values,-vision-and-priorities.aspx>

Inspector is minded to suggest a modification to the plan, the Council will support the inclusion of a Glossary.

1.9 Are adequate provisions in place to ensure satisfactory monitoring of the plan's effectiveness?

- 1.9.1 The Council considers that adequate provisions are in place to ensure satisfactory monitoring of the plan's effectiveness.
- 1.9.2 The Core Strategy Monitoring and Implementation Plan at Appendix C of the Core Strategy (SD001) sets out how the Council is intending to measure the effectiveness of the Core Strategy in meeting its spatial vision, goals and objectives and that it can deliver the intended outcomes.
- 1.9.3 The Monitoring and Implementation Plan sets out key indicators, targets or intended policy outcomes, potential risks to delivery, contingencies to address changes or shortfalls, and also identifies the implementation and delivery mechanisms and partners that will help to achieve the Core Strategy Spatial Vision to 2027.
- 1.9.4 It is important that the effectiveness of the Core Strategy can be monitored to establish if the policies contained within it are achieving the intended spatial vision, goals and objectives. The performance and effects of the Local Plan policies will be monitored and reported on annually as part of an Authority Monitoring Report.
- 1.9.5 For each policy a number of potential risks and contingencies have also been identified to demonstrate how the Core Strategy can deal robustly with changing circumstances. Where necessary, the Authority Monitoring Report may identify any actions or contingencies that need to be taken to address issues identified as part of the monitoring process in order to improve the implementation and delivery of the Core Strategy. It may be the case that the process of monitoring may highlight the need for a timely partial or full review of the Core Strategy.

DUTY TO CO-OPERATE

MEMORANDUM OF UNDERSTANDING

BETWEEN

BLACKPOOL COUNCIL,

LANCASHIRE COUNTY COUNCIL,

FYLDE BOROUGH COUNCIL AND

WYRE BOROUGH COUNCIL

April 2015

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1.0 PURPOSE OF THE MEMORANDUM OF UNDERSTANDING

- 1.1 This Memorandum of Understanding (MOU) updates the first MOU dated August 2013 between Blackpool Council, Fylde Council, Wyre Council (to be referred to as the Fylde Coast Authorities (FCAs) for the purpose of this MOU) and Lancashire County Council (LCC).
- 1.2 This update refreshes the evidence base; the strategic issues, in particular with reference to housing and transport matters; the governance arrangements; and also includes some minor textual changes to improve clarity.
- 1.3 The MOU provides for those strategic planning issues which require cross boundary co-operation and collaboration to ensure the requirements of the Government's 'Duty to Cooperate' are met and that the local plans of the FCAs are sustainable, deliverable and found 'sound' at examination. It formalises the ongoing dialogue and co-operation that currently exists between the four authorities.
- 1.4 The MOU will also guide the approach that the FCAs and LCC take with respect to responding to strategic planning applications and nationally significant infrastructure projects.
- 1.5 The following sections of the MOU provide:
 - Context on the Government's requirement regarding the Duty to Cooperate;
 - Background on the Fylde Coast Peninsula and its geographical and economic characteristics;
 - Cross Boundary Issues - highlighting strategic areas of agreement, including existing co-operation and collaboration between the FCAs and LCC and areas for continued and future co-operation, to fulfil the Duty to Co-operate;
 - Governance arrangements.

2.0 CONTEXT

- 2.1 The Government introduced through the Localism Act and the National Planning Policy Framework (NPPF) a 'Duty to Co-operate' on strategic planning and cross boundary issues.
- 2.2 The Duty to Co-operate applies to all local planning authorities, County Councils and a number of other public bodies and requires a continuous process of engagement and cooperation on planning issues that cross administrative boundaries. This is to ensure strategic priorities across local boundaries are properly coordinated and the process should also involve consultation with Local Enterprise Partnerships and Local Nature Partnerships.
- 2.3 Local planning authorities are expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their plans are submitted for examination. If this is not achieved the Government has indicated that authorities run the risk of their Local Plans being found 'unsound' at Examination.
- 2.4 In particular, the Duty:
- relates to sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council;
 - requires that councils set out planning policies to address such issues;
 - requires that councils and other bodies engage constructively, actively and on an ongoing basis to develop strategic policies in the preparation of local plan documents and activities that can reasonably be considered to prepare the way for such documents;
 - requires councils to consider joint approaches to plan-making.
- 2.5 Paragraphs 178 -181 of the NPPF gives further guidance on 'planning strategically across local boundaries' and highlights the importance of joint working to meet development requirements that cannot be wholly met within a single local planning area, through either joint planning policies or informal strategies such as infrastructure and investment plans.
- 2.6 The NPPF requires that each local planning authority should ensure that the Local Plan and decision-making is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. As part of our approach to working cooperatively, the authorities will consider the best means of gathering information and intelligence on a strategic cross-boundary basis to ensure consistency of data and its interpretation and application to development planning.

3.0 THE FYLDE COAST PENINSULA – SUB REGIONAL FUNCTIONALITY

- 3.1 The Fylde Coast sub-region encompasses the area covered by the unitary authority of Blackpool Council and the two-tier area covered by Lancashire County Council and the district councils of Fylde and Wyre. The area stretches from the Ribble Estuary in the south to Morecambe Bay in the north and the Forest of Bowland moorlands in the east. The area covers 384 sq km and is home to 327,400 residents.
- 3.2 The Fylde Coast sub-region demonstrates a high level of self-containment in terms of housing markets, travel to work patterns and economic functionality.
- 3.3 The Fylde Coast housing market area is broadly determined by patterns of local migration and travel to work patterns. There are strong local connections within that part of the Fylde Coast housing market area comprising Blackpool and west Fylde and Wyre. The remaining areas of Wyre relate to a wider rural housing market with the A6 corridor and eastern Fylde relating more strongly to Preston.
- 3.4 The economic functionality of the Fylde Coast is apparent through the strong travel to work patterns and employment with a shared tourism and cultural offer; regionally and nationally significant advanced manufacturing (BAE Systems at Warton and nuclear processing at Westinghouse, Springfields); the Department for Work and Pensions; and a shared infrastructure including Blackpool Airport, coastal tramway and strategic highway and rail networks.
- 3.5 This economic coherence was reflected in the establishment of the Multi Area Agreement in April 2009 and the Blackpool, Fylde and Wyre Economic Development Company in April 2010 (rebranded the Blackpool Bay Company in 2011), to support local authority partnership working, co-ordinate and drive forward shared objectives and deliver a co-ordinated programme of capital investment.
- 3.6 The landscape across the sub-region is broadly similar, largely falling within the Lancashire and Amounderness Plain National Character Area (NCA), but with a portion of the North Wyre coast within the Morecambe Coast and Lune Estuary NCA. The sub-region encompasses part of the Forest of Bowland AONB.

4.0 CROSS BOUNDARY ISSUES

Context

- 4.1 Paragraph 156 of the NPPF sets out strategic issues where co-operation might be appropriate including:
- the homes and jobs needed in the area;
 - the provision of retail, leisure and other commercial development;
 - the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - the provision of health, security, community and cultural infrastructure and other local facilities; and
 - climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape/habitats and the importance of European sites.
- 4.2 The priority given to these issues will depend on local circumstances and strategic approaches may not be required in every situation.
- 4.3 Working together on strategic planning issues is not new to the FCAs and LCC. Engagement on issues of common concern with respect to housing, employment land and transport infrastructure have been ongoing for many years.
- 4.4 Currently, the spatial planning policies of the FCAs are being reviewed through the development of local plans. Whilst the Duty to Co-operate proposes that neighbouring authorities should consider joint approaches to plan making, the authorities have decided to develop separate Local Plans, albeit closely aligned, due to the different stages of the local plan process at which each authority finds its self and having regard to the unitary status of Blackpool Council.
- 4.5 To undertake a joint local plan would further delay the adoption of an up to date plan for each authority. The coalition government has advised local planning authorities to ensure that they get up to date local plans in place as soon as possible. Without an up to date plan, development decisions will be made on the basis of the NPPF, with the presumption being 'yes' to sustainable development unless 'any adverse impacts would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or specific policies in the Framework indicate development should be

restricted'. This could result in development being approved which does not have the support of the authorities.

- 4.6 Lancashire County Council (LCC) is responsible for the delivery of transport infrastructure and services within Fylde and Wyre districts directed by the Local Transport Plan and Fylde Coast Highways and Transport Masterplan; as well as education and social care provision and new responsibilities relating to flood risk and health. This also involves working with Blackpool at a strategic level to ensure a co-ordinated approach to infrastructure and service delivery. LCC's involvement is therefore critical in the development and delivery of the FCAs' local plans.
- 4.7 With respect to waste management and the provision of minerals, LCC and Blackpool Council as minerals and waste authorities have a long standing relationship of working together in preparing; monitoring and reviewing the Joint Minerals and Waste Local Plan and Municipal Waste Management Strategy for Lancashire. The Local Plan is currently being reviewed and an Onshore Oil and Gas Supplementary Planning Document (SPD) is under preparation.
- 4.8 The FCAs and LCC acknowledge that addressing cross-boundary issues is essential if sustainable development is to be delivered at a local level and economic growth and social and environmental well-being for the sub-region is to be achieved. Those strategic issues which are considered to need cross boundary co-operation are set out below. The 'Key Issues' which are highlighted at the end of each section are not exclusive. The Duty to Co-operate is an ongoing process, as issues and the policy approach are agreed other issues will arise which will need to be addressed. This memorandum will be reviewed and updated as appropriate in accordance with the governance arrangements set out at the end of this document.

Housing

- 4.9 The housing offer on the Fylde Coast has an important role in supporting the sub-region's economy. The Fylde Coast housing market area (HMA) as a whole offers a wide range of housing and neighbourhoods, including some very attractive areas, but there are also some major concentrations of poor quality homes in very unattractive neighbourhoods. These neighbourhoods contribute to the underperformance of the local economy, whilst in the attractive areas it is difficult for local people on modest incomes to be able to afford to buy or rent a suitable home.
- 4.10 To achieve a more balanced housing market the FCAs have undertaken a joint approach to addressing housing issues unrestricted by local authority boundaries. This has included appointing a Fylde Coast Housing Strategy Manager in October 2007 to develop and manage the sub-regional approach to housing and inform policy development.

4.11 Joint housing studies have been produced to inform policy development, including the need for new and affordable housing:

- the **Fylde Coast Housing Market Assessment Study (December 2013) published February 2014** (including Addendums)- to provide a robust evidence base to inform the policy approach to be adopted in the individual local plans. This study is a key document in the Local Plan evidence base and updates the previous 2008 Fylde Coast SHMA. It is accompanied by two Addendums which relate to the 2012 ONS Population and Household projections which were released in October 2014 and February 2015 respectively
- the **Fylde Coast Housing Strategy 2009** - to provide a common understanding, vision and set of priorities for housing across the Fylde Coast housing market area to provide a wider understanding of issues and priorities that enables public and private sector partners to develop their work in a clear strategic context.

4.12 In considering housing need and requirements, the FCAs also need to address the accommodation requirements of Gypsies, Travellers and Travelling Showpeople. The Government's Planning Policy for Travellers (March 2012) sets out the broad approach to be adopted and requires all local authorities to provide for a 5 year supply of sites where a such need is identified. In response to this the FCAs jointly commissioned consultants Opinion Research Services to undertake a Gypsy and Traveller Accommodation Assessment and the findings were published in October 2014. The assessment established a need for additional sites across the Fylde Coast including 81 traveller pitches and 14 plots for Travelling Showpeople to 2031.

We will work together to:

- **reach a consensus on housing provision across the Fylde Coast sub-region;**
- **establish a more balanced and wider housing choice in the Housing Market Area;**
- **promote a strong and distinctive sustainable pattern of settlement growth that supports each area's needs;**
- **reach a consensus on the accommodation needs of Gypsy, Traveller and travelling Showpeople communities across the Fylde Coast sub-region;**
- **agree complementary/joint approaches to the delivery and accessibility of affordable housing.**

Economy – Business and Industrial Development

- 4.13 There are strong links between the FCAs in terms of travel to work patterns and employment, which warrant the joint consideration of future employment development for the sub region.
- 4.15 The size of the Fylde Coast economy is around £4.8bn – some 2% of the North West economy but productivity per head significantly underperforms the Lancashire and England average, reflecting the predominance of the tourism sector. However the sub-region does contain significant specialism in advanced manufacturing in Fylde - aerospace at Warton, identified in 2012 as an Enterprise Zone, nuclear processing at Springfields, accounting for almost half the industrial business lands in the sub-region and advanced chemical manufacturing at Hillhouse, Thornton.
- 4.16 Other strengths exist in food processing and environmental technologies. Environmental technology including Global Renewables at Thornton and fish processing associated with Fleetwood docks contribute significantly to employment in Wyre. The public sector and government agencies are also substantial providers of jobs in the sub-region along with insurance providers Axa and Aegon in Fylde.
- 4.17 Decline in GVA and employment has been a shared experience across the FCAs. However they recognise the need to strengthen, promote and enhance the tourism offer whilst at the same time further develop the other key sectors referred to above, with a need to persuade existing businesses in these sectors to grow and to provide the right conditions for other firms to invest.
- 4.18 Crucial to this is the provision of quality development sites to support new business growth. The peripheral location of the Fylde Coast within the North West makes it critical to provide a portfolio of sustainable employment opportunities to improve economic performance. The FCAs have recognised the need to capitalise on the particular assets, strengths and opportunities of the sub region as a whole. In 2010 a Fylde Sub Region Employment Land Review was agreed by Blackpool, Fylde and Wyre which sets out the current position in terms of employment land availability. Updating this in 2012 Fylde Council commissioned consultants to carry out an Employment Land and Premises Study and Wyre Council undertook an Employment Land and Commercial Leisure Study. In 2015 Wyre commissioned an update of the employment land elements of the Employment Land and Commercial Leisure Study. Blackpool Council has undertaken an updated Employment Land Study which was published in June 2014. Additionally BE Group were jointly commissioned in 2013 by Fylde and Blackpool Councils to undertake an employment land appraisal study relating to land on the Fylde/Blackpool boundary around Whitehills and Junction 4 of the M55 and specific sites in south Blackpool.

- 4.19 The Blackpool Bay Company (BBC) has commissioned Genecon consultants to develop the Blackpool, Fylde and Wyre Local Growth Accelerator Strategy focused on delivering economic change at the sub-area level across the Fylde Coast in line with the Lancashire Enterprise Partnership Growth Plan and Strategic Economic Plan.

We will work together to :

- **undertake joint consideration of future employment development for the sub-region in response to the strong links between the FCAs in terms of travel to work patterns and employment;**
- **agree the sub-regional employment land requirement;**
- **agree the strategic priorities for land use with the aim of attracting major new economic development to help strengthen the Fylde Coast economy;**
- **to promote sustainable solutions at key strategic sites and corridors:**
 - **Blackpool Airport corridor – Blackpool/Fylde boundary including newly designated Enterprise Zone;**
 - **The Enterprise Zone at BAE Systems – Warton – Fylde;**
 - **Hillhouse International Business Park – Wyre;**
 - **Central Business District – Blackpool Town Centre;**
 - **Junction 4 of the M55 – Fylde/Blackpool boundary;**
 - **A6 Corridor/Garstang – Wyre**

Retail

- 4.20 Retailing is a key strategic issue over which the FCAs collaborate and in September 2007 White Young Green were commissioned by Blackpool, Fylde and Wyre authorities to carry out the first sub-regional retail study for the Fylde Coast. The study, which was published in June 2008, was undertaken to provide an in-depth analysis of the retail provision within the main centres of the Fylde Coast Sub-Region, including an assessment of the extent to which the centres were meeting the retail needs of the local population and the role of the local shopping network and the sub-regional shopping hierarchy.
- 4.21 This 2008 study was updated by Roger Tym and Partners – the ‘Joint Fylde Coast Retail Study 2011’ in order to reflect significant changes since the first study. These include major new developments, in particular the extension to the Houndshell Shopping Centre in Blackpool; economic changes; forecast retail expenditure growth rates; and changes in national guidance at the time with respect to the publication of PPS4 (December 2009) and the test of soundness for Local Plan Documents in PPS12 (June 2008), now superseded by the NPPF.
- 4.22 The 2011 study provides evidence to inform the local plans of the FCAs with respect to:
- a. the retail role of towns within the Fylde Coast and their position in the retail hierarchy;
 - b. potential future development needs for each authority; and
 - c. definition of the town centres within the Sub-Region which are Blackpool, Lytham, St Annes, Kirkham, Fleetwood, Cleveleys, Poulton-le-Fylde and Garstang.
- 4.23 The 2011 study has been endorsed by each of the FCAs to be used as appropriate evidence base on which to inform policy in their local plans.
- 4.24 To address over-trading issues of particular convenience stores highlighted in the 2011 study, Fylde and Wyre jointly commissioned Peter Brett Associates (formerly Roger Tym and Partners) to undertake additional work to assess the impact on future convenience expenditure capacity in their areas. It also provided the opportunity to extend the consideration of future floorspace needs for an additional 4 years to 2030 to reflect Fylde and Wyre’s Local Plan periods.

We will work together to:

- **reach a consensus on the retail hierarchy and roles of towns within the Fylde Coast Sub-Region;**
- **provide evidence to effectively resist retail applications which are not in accordance with the retail hierarchy contained in the development plans of the FCAs.**

Transport

- 4.25 Developing a more sustainable and efficient transport network across the Fylde Coast is vital for our economic prosperity and our social and environmental well being. Our sub-regional transport infrastructure needs to support our economic priorities and effectively integrate with future development locations to reduce the need to travel, making it safe and easy for Fylde Coast residents to access jobs and services; for visitors to access and enjoy the tourism and cultural offer; and for business to be attracted to invest in the sub-region.
- 4.26 The transport infrastructure of the Fylde Coast comprises road, rail, tram, air and potential port links supported by a comprehensive network of footpaths, canal, cycle routes and bridleways.
- 4.27 At the heart of the transport network is the M55 linking Blackpool with the M6 north of Preston. This is supported by the principal road network including the key routes of the A583 (Preston-Kirkham- Blackpool), the A584 (Freckleton/Warton –Lytham St. Annes-Blackpool), the A585(T) (M55 Junction 3 to Fleetwood), A6 (Preston – Garstang – Lancaster), the A586 (A6 to A585) and A588 (A585 through Wyre East Rural to Lancaster).
- 4.28 The North Fylde line connects Blackpool North, Poulton-le-Fylde and Kirkham with frequent and fast services to Preston. This line has recently been electrified which will increase the potential; for modal shift to relieve the road network enhance and may see through services by using Pendolino trains by 2017. There are a total of twelve railway stations in the sub-region, most of which are situated on the south Fylde line which connects to Blackpool South station and the Pleasure Beach and serves Lytham and St. Annes with an hourly service to Preston.

- 4.29 The Blackpool Tramway system runs for some 11 miles along the coast from Starr Gate in south Blackpool to north Fleetwood linking to Blackpool North and South stations although the interchange between the two is currently poor. The tramway has seen recent significant investment with a comprehensive upgrade completed in 2012, providing a modern accessible transport system which carried some 4.3 million passengers in the year ending October 2013. Through Sintropher funding, work has been undertaken to assess the development of tram services linked to the national rail network. The Blackpool North Tram option proposes a 700m extension from the promenade at North Pier along Talbot Road to Blackpool North rail station. The intention is to create an interchange between the tram and rail, increasing accessibility and connectivity between destinations along the Fylde Coast tramway and the national rail network.
- 4.30 Until October 2014, Blackpool Airport operated regular charter and scheduled flights throughout the UK and to various European destinations. In addition, whilst the Port of Fleetwood ceased ferry services in 2010 it maintains its capacity for ferry Roll On-Roll Off (RORO) and has potential as a maintenance base for the off-shore energy sector, including wind turbines.
- 4.31 Whilst the transport infrastructure for the Fylde Coast could be considered as comprehensive there are major strategic challenges which need to be addressed to improve our economic competitiveness. These include:
- The A585(T) corridor which presents a significant bottleneck at Singleton crossroads and other local problems for connectivity between the M55 and Fleetwood
 - Congestion on the A585 between the M55 and Fleetwood could undermine future economic development activity of the Fleetwood -Thornton Development Corridor (to which the adopted Fleetwood-Thornton Area Action Plan, is applicable)
 - The A6 corridor and in particular junction 1 on the M55 is close to capacity which could limit future growth along the A6 corridor beyond planned growth in North Preston
 - In the south access to the BAE Systems site at Warton needs to be improved to allow redundant brownfield land to be suitable for future development. Such connectivity issues act as a barrier to communities accessing employment. In response to this the Central Lancashire Highways and Transport Masterplan proposes a Western Distributor road around Preston linked to a new Junction 2 on the M55 to accommodate significant housing development in northwest Preston and improve access to the Enterprise Zone site

- Access to the Warton Enterprise Zone from the wider Fylde Coast can be problematic in particular from Wyre, trips taking around 50 minutes from
- Fleetwood to Warton outside peak holiday season and significantly longer within season. In addition public transport is also limited
- Public transport connectivity is relatively poor with limited rail connectivity between some of the key urbanised areas and coastal and market towns of Wyre and Fylde and the wider North West. Heavy rail connectivity to St Annes and south Blackpool is restricted by a single track line with trains only running once every hour in both directions. The propensity of those in the South Fylde rail line catchment area to use rail is well below the national average. There is a real need to increase service frequency and reliability, meeting transport demand from Lytham St Annes and supporting regeneration in south Blackpool. In addition, a lack of suitable interchange means the tram system is currently disconnected from the rail infrastructure. At Preston, interchange between services is made more difficult by poor platform access between main line platforms and those serving the Fylde Coast
- Blackpool Airport, now designated within an Enterprise Zone is a considerable sub-regional asset and there is a need to ensure that the economic potential of this asset is maintained. Currently public transport access to the airport is relatively poor. There is no rail station and at present no buses directly serve the site. If the airport is to truly appeal, there needs to be investment in transport infrastructure to the site from not only across the Fylde Coast but also from places such as Preston

4.32 Local transport planning priorities for Lancashire and Blackpool captured in the Fylde Coast Highways and Transport Masterplan will play an important part in addressing these strategic challenges. As well as the strategic issues presented above, this will consider important issues of rural connectivity, bus infrastructure and coach travel and the promotion of cycling.

We will work together to:

- **identify and carry forward a programme of cost effective viable improvements along the A585, working with the Highways Agency to remove the last remaining pinch-points along the route;**
- **consider the need for and the means to provide new direct, high standard road links between the M55 motorway north to Norcross and south to St. Annes to relieve road congestion and improve connectivity to potential areas of growth and development;**
- **to identify and deliver necessary improvements along the A6 corridor to support new growth and development;**
- **support the sustainable development of Blackpool Airport including working to explore the potential to develop commercial aeronautical activity and improvements to surface access by public transport;**
- **Support improvements to Preston Station, Blackpool North and other stations and maximise the opportunities presented by rail electrification and HS2 for rail travel and commuting;**
- **support further improvements to and better integration of the sub-regions train and tram networks to assist north-south movements along the coast from Fleetwood to Starr Gate and south to Lytham and St. Annes;**
- **Consider the opportunities presented by significant new road infrastructure in Central Lancashire, including the prospect for a new road crossing of the River Ribble;**
- **seek a common approach to parking standards across the sub-region.**

Surface Water Drainage and Waste Water

- 4.33 Water infrastructure capacity is a key cross boundary issue which will directly affect the delivery of built development across the Fylde Coast. The main issues relate to surface water drainage; the capacity of the existing sewage network and the need to ensure that proposals for new development have no adverse effect on the bathing water quality along the Fylde Coast. This is a vital issue as the quality of our beaches and bathing water underpins our tourism offer and our future economic prosperity.
- 4.34 Recent studies have been undertaken to inform the evidence base including the Central Lancashire and Blackpool Outline Water Cycle Study completed in April 2011. Whilst this study covers those authorities in Central Lancashire and Blackpool which were included in the Growth Point area, the study provides an assessment of the flood risk planning data, foul drainage, surface water management water resources and infrastructure issues including information on the wider Fylde Coast area. In addition, as part of its role as a Lead Local Flood Authority, Blackpool has recently produced a Blackpool Surface Water Management Plan researching and aligning all data, information and legislation, in liaison with United Utilities and the Environment Agency on critical capacity issues, with a focus on existing assets, identifying flood risks, mitigation measures and with the view to developing an on-going implementation plan. This plan will include wider consideration of cross-boundary surface water infrastructure and drainage issues along the coastal belt in order to generate and develop sustainable drainage measures. Lancashire County Council is the Lead Flood Authority for the Fylde and Wyre area and works closely with the FCA's to identify and address Blackpool Flood Risk Management Strategy for 2014 to 2017.
- 4.35 From the evidence base it is clear that the main cross boundary issues relate to network capacity issues which are contributing to surface water flooding and spills of untreated waste water into the Irish Sea, putting at risk Fylde Coast bathing waters under the new bathing water legislation due to come into force in 2015.
- 4.36 It is therefore imperative that the FCAs and LCC agree a supportive approach to surface water and waste water management to ensure that the economic prosperity of the Fylde Coast is not compromised and that the future development requirements of the sub-region can be accommodated. This includes the approach to ad hoc development not compromising the delivery of required infrastructure improvements to address the capacity issues of the Fylde Coast.
- 4.37 In recognition of the issues surrounding water management the Fylde Peninsula Water Management Group (FPWMG) was set up in April 2011. The Group is a partnership comprising the Environment Agency, United Utilities, the FCAs, Lancashire County Council and Keep Britain Tidy. The purpose of the group is to provide a sustainable and integrated approach to the management of coastal protection; water quality (including bathing waters), surface water drainage (including flooding) and development.

- 4.38 The Partnership established a set of guiding principles to work towards:
- Work together to develop a strong evidence base so we can prioritise what is important for the area;
 - Use this evidence to demonstrate how environmental improvements can deliver real and lasting social and economic outcomes;
 - Cooperate to identify and deliver innovative solutions;
 - Unlock new funding streams and align investment plans to deliver real value for money;
 - Develop an agreed programme of works that delivers real and lasting change.
- 4.39 The FPWMG has also produced a ten point action plan which sets out the work that is needed to deliver long term improvements to bathing water quality across the Fylde Peninsula.”

We will work together to:

- **agree a common approach to surface water and waste water management, including the approach adopted to ad hoc development, to ensure the delivery of required infrastructure improvements needed to accommodate future development requirements is not compromised.**

Natural Environment

- 4.40 The Fylde Coast sub-region is characterised by a wide variety of natural environmental assets, from intertidal mudflats to the high Bowland fells, and including all of Lancashire's surviving natural sand dune systems. There is a range of overlapping wildlife designations including sites of international, National and local importance which seek to conserve natural habitats and/or species. Six designated sites of international importance (including Ramsar, Special Protection Areas (SPA) and Special Areas of Conservation (SAC)) fringe the coastline. There are ten nationally designated Sites of Special Scientific Interest (SSSIs) which include Morecambe Bay, Ribble Estuary, River Wyre. Offshore there is a Marine SAC (Liverpool Bay) and Marine SPA (Shell Flat and Lune Deep) and a Nationally important Marine Conservation Zone (Fylde). There are also 111 locally important Biological Heritage Sites (BHSs), five Local Geo-diversity Sites

and pockets of ancient woodland. Part of the Forest of Bowland Area of Outstanding Natural Beauty lies within the sub region.

- 4.41 The sub-region is covered by two Local nature partnerships: Morecambe Bay LNP and Lancashire LNP. In addition, the Morecambe Bay Nature Improvement Area (NIA) was one of twelve designated in 2012, with the aim of improving the landscape for nature, the community and visitors.
- 4.42 A core planning principle of the NPPF relates to conserving and enhancing the natural environment. This should be considered at a strategic level as landscape-scale networks of biodiversity and green infrastructure cross administrative boundaries and development in one area can have a potential effect upon natural assets in another. Green infrastructure is defined by Natural England as a strategically planned and delivered network comprising the broadest range of high quality green spaces and other environmental features. An ecological network for Lancashire, including the whole of the sub region, has been identified on behalf of the Lancashire LNP and made available through LERN. LERN, which is hosted by the County Council, supports the environmental information and intelligence needs of public, private and third sector organisations operating in Lancashire, as well as members of the public. Access to LERN data and services is covered by a separate MoA.
- 4.43 To determine the environmental impact and effect on European designated sites, the Strategic Environmental Assessment (SEA) Directive 2001/42/EC and the Habitats Directive respectively require assessments of plans and projects of neighbouring authorities to be considered, so requiring co-ordination and sharing of information at the Fylde Coast sub-regional level.
- 4.44 The sub-region is also characterised by relatively small but strategically important areas of Green Belt between i) Fleetwood, Thornton and Cleveleys ii) Thornton, Cleveleys, Poulton-le-Fylde and Blackpool iii) South Blackpool and St Anne's, iv) Lytham and Warton, v) Freckleton and Kirkham and vi) Staining and Blackpool / Poulton-le-Fylde. Any substantial strategic changes to Green Belt boundaries would need to be undertaken as part of a holistic sub-regional review and there is not currently any evidence of a requirement for such a review to take place.

We will work together to:

- **conserve and enhance natural habitats, ecological networks and landscapes of importance; and**
- **develop a strategic network of green and blue infrastructure across the sub-region.**

5.0 GOVERNANCE

5.1 The Duty to Co-operate requires that councils engage constructively, actively and on an ongoing basis. There is therefore a need to establish governance arrangements and protocols to ensure that the requirements of the Duty to Co-operate are met and that the FCAs can demonstrate at examination of their Local Plans that appropriate and constructive co-operation has taken place to ensure sustainable outcomes to strategic planning issues.

5.2 Governance arrangements under this MOU will comprise:

A Joint Member and Officer Advisory Steering Group to oversee the work under the Duty to Co-operate. The Terms of Reference for the Group are as follows:

- a) **To facilitate the Fylde Coast Authorities in meeting their Duty to Cooperate by discussing matters of common interest in relation to strategic planning on the Fylde Coast as a whole and to make recommendations to each Local Planning Authority and the County Council as necessary;**
- b) **To review as necessary and keep up to date the Memorandum of Understanding between the Fylde Coast Authorities;**
- c) **To collaborate on the development of planning, economic development and transport policy where appropriate to achieve consistency of approach**
- d) **To commission joint studies relating to strategic matters and the development of planning policy in each individual Local Authority and ensure that the evidence base remains up to date;**
- e) **To discuss and resolve as far as is possible cross boundary issues to make recommendations to each individual authority and the County Council as necessary;**
- f) **To keep each Local Planning Authority and the County Council informed on the development and review of planning, economic and transport policy in each individual Authority area;**

- 5.3 The group will be chaired on a rotational basis by a Member of one of the four authorities. The Council Leaders and Chief Executives will have the remit to appoint up to two appropriate representative to act on their behalf as necessary. All meetings will be minuted to provide an ongoing evidence of co-operation
- 5.4 An Officer Working Group will provide support to all joint working arrangements as appropriate to ensure constructive engagement, good communications and transparency, seeking innovative sustainable solutions to strategic issues

Appendix B: Further Correspondence from Natural England

From: Wheeler, Kate (NE) <kate.wheeler@naturalengland.org.uk>
Sent: 22 April 2015 12:15
To: Helen Del Piano
Subject: RE: Natural England Representation to the Blackpool Core Strategy
Attachments: ATT2172042.txt

Dear Helen

Thank you for your email. Natural England has previously raised concern with two aspects of the Blackpool Core Strategy, firstly with respect to development around Marton Moss (Policy CS26) and how this relates to Neighbourhood planning, and secondly with regard to residential and employment development areas to the South of Blackpool (Policy CS24 & CS25).

Neighbourhood Plan relationship and Policy CS26

As you have explained no decision has been made as to what type and scale of development is appropriate (if any) the Marton Moss area (policy CS26). Natural England notes that you propose to develop further detailed policy and site allocations as part of *The Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Document* in consultation with the community.

Natural England agrees that a modification to the supporting text in paragraph 8.27 to outline the current status of the Neighbourhood Plan would be beneficial, however we appreciate that Policy CS26 does not promote development around Marton Moss one way or the other but acknowledges that the Neighbourhood Plan process, if promoting development in this area, would need to accord with the Habitats Regulations in that likely significant effects must be ruled out before a Neighbourhood Plan can progress.

Subject to this modification Natural England confirms that the HRA Screening Assessment of the Core Strategy is satisfactory in respect of Marton Moss.

Policy CS25 (South Blackpool Growth)

We are aware that there is a live planning application relating to this area (OUT/11/314, Whyndyke Farm), which is still pending and Natural England has provided comments on this application with respect to designated sites. A shadow Habitats Regulations Assessment (HRA) was undertaken as part of the application process and was able to rule out likely significant effects on the basis of the mitigation measures proposed. The HRA also took into account functional linked land, which was a concern we raised in our 2014 response to the Core Strategy (our reference 125331). In this particular case pink footed geese and whooper swan were recorded as using fields 1km away from the development site. However due to this distance and because of specific measures to reduce disturbance (noise barriers and the retention of woodland to minimise visual disturbance), likely significant effects could be ruled out. Natural England also highlighted that the scheme would benefit from significant Green Infrastructure (GI) to help reduce pressure on designated sites. We are aware that onsite GI, including green corridors, will be provided. The planning application process with respect to this site has overtaken the plan process slightly and therefore the issues we identified in our 2014 letter have in most part been resolved through the mitigation measures presented in the planning application.

It would be beneficial if Appendix 4 of the Core Strategy HRA (Assessment of Policies) was updated to reflect the outcomes of the HRA set out under section 3 of the report, i.e. the Appendix 4 table still indicates likely significant effects with respect to some policies and it would be useful to update the table to reflect where policies updates or down the line assessment will rule out effects, thereby ensuring no likely significant effects remain at the Core Strategy level.

I hope this clarifies the situation. Please contact me if you have any further questions.

Thank you

Kate Wheeler
Lead Adviser
Cheshire, Greater Manchester, Merseyside & Lancashire Area

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