

BLACKPOOL CORE STRATEGY THE NEED FOR NEW HOMES TO 2026

Introduction

The Blackpool Core Strategy Preferred Option was subject to public consultation from May to July 2010 and set out the Council's proposed sites and opportunities to meet the needs for new homes in Blackpool to 2026.

Policy S3 “Housing Need: Blackpool Strategic Housing sites 2010-2026” sets out proposals for 6,800 new homes (see overleaf).

The Council's Preferred Option is based on providing a balanced approach to meet future development needs in Blackpool, with an overriding focus on maximising regeneration, alongside some supporting housing growth to create a wider and improved housing offer.

Section 1 summarises the housing issues raised in **public consultation** on the Blackpool Core Strategy Preferred Option.

Sections 2 to 4 of this report go on to review Blackpool's housing development proposals with respect to three further specific influences and important considerations:

- **The revocation of Regional Spatial Strategies** - on July 6th the Secretary of State for Communities and Local Government announced the end of regional housing requirement targets (for Blackpool the target was 444 dwellings).
- **The Fylde Coast Strategic Housing Market Assessment** - at the sub-regional level, the Fylde Coast 'SHMA' sets out a comprehensive evidence base for local housing need. The approved Fylde Coast Housing Strategy reflects these findings with new house-building a key element in shaping the overall balance and quality of housing available in the area.
- **Recent Housing Trends** – At the local level updated figures are now available from the Housing Monitoring Report to 1st April, 2010 of housing completions, planning permissions and land availability within Blackpool. These trends also needs to be seen and informed by wider national housing and economic trends which directly impact on housing markets across the country as a whole.

This report therefore seeks to review Blackpool's need for new housing following the end of regional housing targets, fully informed by the latest available information and by the public consultation response to the proposals in the Blackpool Core Strategy Preferred Option to meet that need.

Finally, **Section 5** considers their impact and the way forward for Blackpool, and sets out **recommendations** on the need for new homes and changes to the Blackpool Core Strategy.

Policy S3: Housing Need: Blackpool Strategic Housing Sites 2010-2026

To identify sites and opportunities for the development of 6,800 new homes to meet Blackpool's need between 2010 and 2026:

Central Blackpool inner area development sites: (through regeneration/ housing intervention/ market uplift)	2,000
Strategic Development Site at M55 Hub/ Marton Moss	2,700
Other housing development sites identified in SHLAA including:	1,700
<ul style="list-style-type: none"> • Talbot Gateway • Blackpool and the Fylde College (Bispham site) • Former Devonshire Road Hospital • Leys Nursery • Ryscar Way 	
Windfall allowance for conversions	1,000
Total	7,400 dwellings
Completed dwellings 2003-2010	2,000 dwellings
Sites under construction or with planning permission at 1 st April 2010	1,400 dwellings
Overall Total	10,800 dwellings

The above figures accord with the adopted North West Regional Spatial Strategy requirement for 10,200 dwellings, with some flexibility for uplift beyond this figure limited by land constraints and Blackpool's tight knit boundary.

NB *These figures are accurate to 2009 and comprise the estimated position forecast at April 1st 2010 - with these figures to be finalised by time of completion of consultation document*

1 Blackpool Core Strategy Public Consultation

- 1.1 Consultation on the Blackpool Core Strategy Preferred Option commenced on 10th May and continued until the end of July 2010. The Core Strategy, was made available to view at Council Offices, all libraries, and online. Extensive publicity was given in the local press (Evening Gazette) and in 'Your Blackpool'; letters were sent to all statutory consultees and other interested stakeholders; and summary leaflets provided.
- 1.2 Council planning officers were also present at the seven July Area Forum 'Market Places'. The Cherry Tree Area Forum meeting specifically focussed on the proposals for Marton Moss, which was the major item on the agenda. A drop-in exhibition and consultation event was also held and leaflet prepared specifically dealing with housing development issues at Marton Moss.
- 1.3 To encourage feedback, responses were invited in a range of formats including letters, emails, comments forms, questionnaires and online.

Summary of Consultation Responses

- 1.4 Consultation on the Core Strategy attracted substantial interest in the local press, and at the exhibition events and Area Forums. A further report will provide a full analysis of the consultation responses on the wider Core Strategy. This report specifically focuses on those responses which raised issues with direct regard to "The Need for New Homes to 2026".
- 1.5 In total 30 written responses and 10 questionnaires were received from residents, statutory consultees and interested parties specifically relating to housing development issues.
- 1.6 Respondent's concerns were largely focused on the scale of housing proposed, and the balance between regeneration and proposed development on the edge of Blackpool.
- 1.7 There was overwhelming support for the broad strategic policy approach to maximise regeneration. Proposals for some level of supporting growth to create a better balanced mix of housing to meet needs on the edge of Blackpool received some support, but also raised substantial objections.
- 1.8 The main concerns raised were:
 - The need for the revision of the proposed scale of housing following the end of regional housing targets
 - The urgent need for regeneration in the inner areas and to prioritise focus on the former holiday areas – but questions about the availability of funding to support inner area regeneration
 - A significant level of support for the rebalancing and growth of the local economy through wider growth at the Hub from public sector bodies and other organisations, as well as from developers and some local residents on the Moss
 - Equally many asked questions about where the need for new homes was from and there was substantial local resident opposition to proposed development on Marton Moss.

- The need for greater detail in terms of infrastructure, implementation and delivery to support these proposals, including concerns about foul and surface water capacity issues and sustainable transport provision.
- Recognition that any wider development strategy was dependent on the support of Fylde Borough Council, and that careful consideration needs to be given to meet economic development needs as well as new housing.
- Support for the development of high quality homes on the Moss as a driver for wider improvements and a more stable community
- Concerns about the alignment of proposals for edge of Blackpool development with regeneration proposals, but also developer concerns that strict phasing would adversely impact on the supply of housing
- Support for retaining the neighbourhood character of the Moss, including lanes, dykes and hedgerows, and to keep open space for allotments and large gardens.
- Views that infill development should be permitted, that owners should be able to develop their own lands, and that neglected areas of the Moss are in need of development to improve the area.
- Concerns raised by numerous responses regarding the need to safeguard remaining areas of land, and about loss of green space
- The need to protect the biodiversity of the Moss, and to involve wider partners in preparing a biodiversity strategy as part of the phased implementation of any development
- Some residents also raised issues about building on marshy and potential contaminated land
- The need to protect existing sports facilities at Marton Moss/ M55 Hub
- The need to give careful consideration to the permanence of a proposed extension of the Green Belt in south Blackpool
- Detailed justification would be needed of local circumstances to justify a high windfall conversions allowance in the first ten years
- Other specific issues were raised were about the Fylde Coast 65% brownfield target, the lack of reference to Whyndyke in the phasing policy, and the need to consider a sustainable extension holistically.

1.9 *Generally, there was a notably marked difference between the written representations in direct response to the Core Strategy consultation, compared to the feedback from the questionnaires and consultation events which were overwhelmingly against further development on the Moss.*

1.10 A more detailed summary of the responses received during public consultation on the scale and direction of future housing development proposals is set out at Appendix 1.

1.11 Public consultation on the Core Strategy ultimately coincided with the Government's announcement of its revocation of regional housing targets. This has enabled the review of the need for new homes in Blackpool in this report to be undertaken taking full account of both issues.

2 The Revocation of Regional Spatial Strategies

- 2.1 The Ministerial Statement of 6th July 2010 announced the revocation of Regional Spatial Strategies and changed the future policy basis for meeting housing needs from central targets to more locally based planning decisions.
- 2.2 An accompanying letter contained advice on how local authorities should proceed until more detailed national policy is produced. It restated the Government's commitment to housing growth and its intent to replace regional targets with powerful local incentives to encourage new house-building. Continued importance remains attached to the ongoing preparation and implementation of Local Development Framework Core Strategies.
- 2.3 The Government therefore promotes pressing ahead, but reviewing as soon as possible the targets set out in the regional plans. Local planning authorities are now responsible for establishing the right level of housing provision in their area, and identifying the long term supply of housing land without the burden of regional housing targets.
- 2.4 The Government's planned new legislation will shortly spell out in more detail its new policy framework for the introduction of strong incentives for local housing development. The ministerial guidance also makes clear that Local Authorities should continue:
- to justify the housing numbers in plans and to collect and use reliable data.
 - to identify enough viable land in their Local Development Framework Documents to provide a five year supply of deliverable sites.
 - to identify broad areas of development to deliver their housing ambitions for at least 15 years from the date the plan is adopted.
- 2.5 The need is therefore to continue to assess the new housing required based on the latest available information, data and research.

Projections and Forecasts of Housing Requirements

- 2.6 The total number of households in the Fylde Coast area has risen over the last 30 years and is predicted by the Office for National Statistics to rise at a much faster rate still over the coming decade. Predicted household growth forecasts for Blackpool and on the Fylde Coast are based on the combined impact of:
- *Natural population change* – a loss of several hundred people each year as a result of an excess of deaths over births.
 - *Net in-migration* – a larger net increase in household numbers from in-migration.
 - *Smaller average household size* – most importantly growth in local resident household numbers is a result of general trends towards smaller families, most particularly linked to an ageing population.

2.7 At the regional level, housing forecasts remain available from two main sources:

- Ministerial guidance advises that Local Authorities may initially wish to continue to base housing targets on the figures submitted to and supported by Councils at the original Regional Spatial Strategy Examination - supplemented by more recent local information. The originally agreed "option 1" figure for Blackpool was the subsequently adopted Regional Spatial Strategy total of 8,000 dwellings between 2003 and 2021 (annual average 444 dwellings per annum).
- More recent forecasts of housing requirements were made to inform the preparation of the now abandoned planned review of the Regional Strategy for the North West, ("RS 2010"). These provide six alternative housing growth scenarios to meet needs to 2030, based on varying assumptions of job and economic growth and provide initial advice to help inform future housing targets across the North West, as set out below.

	Alternative Scenarios 2006-2030 Forecast Housing Requirements	Blackpool	Annual Figure	Fylde Coast
1	Current RSS Distribution	10,600	444	22,900
2	4NW REFP Workplace based projection	10,400	433	31,700
3	4NW REFP Resident based job growth	10,200	425	27,600
4	ONS Demographic Trends	13,900	579	42,800
5	NHPAU Lower range	12,200	508	26,200
6	NHPAU Higher range	13,800	575	29,700

1 = North West Regional Spatial Strategy based needs to 2030

2/ 3 = Regional Economic Forecasting Panel

4 = Office of National Statistics

5/ 6 = National Housing Planning and Advice Unit

2.8 It is not relevant to go into these figures in any detail, but it should be noted that:

- For Blackpool all the housing forecasts were either around or in excess of the past levels of planned provision of 444 dwellings per annum.
- Forecast requirements across the Fylde Coast were also all higher than the combined earlier RSS requirement (22,900).
- The housing land capacity limitations of Blackpool's constrained local authority boundaries were not reflected in the figures.
- The realities of recent housing market delivery also mean that the longer the current downturn continues, the stronger the likelihood that levels of delivery will fall short of these figures.

3 The Fylde Coast Strategic Housing Market Assessment

- 3.1 The Fylde Coast SHMA was undertaken to inform Blackpool, Fylde and Wyre Council's understanding of the sub-regional housing market and develop a coordinated policy framework. Undertaking an SHMA is a key requirement of Government planning for housing to support authorities in developing a strategic approach to housing need and demand across all sectors.
- 3.2 The Fylde Coast SHMA was completed in 2008 and covers a wide range of issues. It forms part of the evidence base supporting the preparation of the Blackpool Core Strategy.
- 3.3 The SHMA recognised many factors have combined to have a detrimental impact on the character of Blackpool's inner areas, with problems of health, worklessness and high benefit dependency. Although clearly fulfilling an important role in terms of affordable housing, the poor quality of the private rented stock has a wider detrimental impact on the perceived housing offer, economy and physical health of central Blackpool and the town as a whole.
- 3.4 Affordability is also a problem in Blackpool, as in the country as a whole. Despite the fact that prices are lower, incomes are too.
- 3.5 The SHMA identified the priority need for housing policies to deliver a better housing choice. It is essential for Blackpool's housing policy to react to rather than just reflect past trends – with strong integration between, housing, economic and community strategies. Action at the top end of the housing spectrum to increase development of better homes is seen as mutually supportive, promoting the economy and regeneration of adjacent failing parts of Blackpool.
- 3.6 The recommendations set out in the Fylde Coast SHMA informed the approved *Fylde Coast Housing Strategy*, key elements of which include:
- The overall need to provide a better balanced future housing offer, and a wider range of housing choices in the inner areas and the town as a whole.
 - The need to prioritise affordable housing provision in the inner areas to achieve a better balanced emphasis away from rented housing.
 - The need to develop a wider range of more aspirational housing in the town centre and along the seafront.
 - The need for more detached and family accommodation to create better choice on the edge of Blackpool to balance the housing market and support the local economy.
- 3.7 These priorities informed the policies set out in the **Core Strategy Preferred Option**, to reposition Blackpool's housing offer and support more balanced, sustainable and healthy communities by an overriding emphasis on maximising regeneration, with some level of supporting growth.
- 3.8 Blackpool's shortage of remaining lands, tight local authority boundary, its structural local need, and national priorities to use previously developed land all support the commitment to maximise regeneration.

4 Recent Housing Trends

Blackpool: Housing Development Trends 2010

- 4.1 A supply of suitable sites is the key to attracting higher quality accommodation both to town centre and seafront locations, as well as sites on the edge of Blackpool. The Blackpool Housing Monitoring Report (HMR) sets out the latest housing development data at 1st April 2010 which mirror the national economic downturn and depressed wider housing market, but also very much reflect the uniquely specific characteristics of the local housing market and the acute limitations on sites.
- 4.2 Over the last six years total 'new build' housing developments in Blackpool have decreased from an average of 273 dwellings (2004-7) to 106 new homes (2007-10) and just 57 in 2009-10, the lowest on record for many years.

Table 4: Total Net New Dwellings 1st April 2003 – 31st March 2010

Year	New Build	Conversions	Total New Dwellings
2003-04	112	122	234
2004-05	270	43	313
2005-06	290	109	399
2006-07	259	79	338
2007-08	183	81	264
2008-09	81	109	190
2009-10	57	66	123
2003-10	1252	609	1861

- 4.3 Three fifths of new build completed in the last 3 years has been flats. Alongside, the level of conversions has remained high, largely from holiday to residential use. The result is that Blackpool's housing development profile is becoming increasingly comprised of new flats and conversions, with a narrow range of other new dwellings.
- 4.4 The total of 1861 conversions and new build completions 2003-2010 was already almost a thousand below the level of provision required against the now revoked Blackpool housing requirement of 444 dwellings per annum. To 'catch up' with this figure would already have required new development to proceed from 2010 onwards at a rate in excess of 500 dwellings per annum.
- 4.5 Looking ahead, the narrow Blackpool new housing offer will be expected to improve as the housing market returns to more normal levels of growth. However, while the market momentum may be re-established, Blackpool's constraints on land will remain.
- 4.6 The 2010 HMR identified there were 953 new build dwellings with planning permission on which development had not started, again, almost three fifths of which are flats, and only 5% of which are detached dwellings, and 419 outstanding conversion planning permissions. Taken together these 1,372 new permissions thus remain dominated by flats and conversions.

- 4.7 In addition, the Council's *Strategic Housing Land Availability Assessment* (SHLAA) identifies potential wider capacity from other sites of over 5,000 dwellings within Blackpool, roughly equally divided between sites within the existing urban area (many of which remain in existing use) and potential sites on Marton Moss. Policy S3 of the Blackpool Core Strategy is informed by these figures.

The Wider Housing Market

- 4.8 The downturn in recent housing figures is also very much part of the wider national picture. Across the North West as a whole, figures in 2009-10 were 42% down on levels of new house-building three years ago in 2006-7. In England as a whole, figures were 32% down over the same period (69% in Blackpool).
- 4.9 Nationally there is a need for substantial improvements in affordability to stimulate the first time buyer market, but this is currently matched by a wide reluctance of existing home owners to sell properties in a falling housing market.
- 4.10 Changes in the wider housing market and economy will continue to impact on future levels of development for Blackpool and their potential delivery. While there is always a level of uncertainty regarding the future direction of the housing market, current speculation is almost entirely based around two main scenarios that either:
- spending cuts (supported by positive economic figures from certain economic sectors) will lay the foundations for longer term recovery and short term changes will be followed by a period of generally more stable house prices and a more stable future housing market, or
 - there could be further housing downturn and recession fueled by budget deficit, spending cuts and job losses that will impact across the UK.
- 4.11 The bottom line conclusion in terms of this report must be that future prospects for increasing the level of house-building activity in the short term remain uncertain. The Government's new policy framework will seek to incentivise a substantial upturn in development and how successful this is will become apparent in the future.
- 4.12 What does seem clear in October 2010, however, is that without predicting when economic recovery will provide for a more sustained housing market uplift, the best prospect in the foreseeable future is of a relatively more stable market. There seem no realistic prospects or any desire for a return to the pre-2006 scale of house-building, with a more risk averse borrowing and lending market.
- 4.13 In all these circumstances, the relevance for Blackpool and for the future review of the need for new homes to 2026 is that while housing needs and the strategic priorities of regeneration and supporting growth remain the same – the scale and pace at which this is likely to be delivered will be reduced.
- 4.14 There is already a substantial shortfall against the earlier housing targets. Looking further ahead, whether to 2013, 2016 or beyond, the recovery in house-building rates is not expected to significantly exceed the figures that Blackpool has achieved in the recent past or reach the now revoked target of 444 dwellings per annum. In the short term house-building will continue to be way below this figure.

5 Housing Overview and Response to Public Consultation

- 5.1 In all the above terms the need is to review Blackpool's needs for development of new homes to 2026 and the proposals set out in Policy S3 of the Blackpool Core Strategy Preferred Option.
- 5.2 The target set out in Policy S3 was for 444 dwellings per annum from 2003-2026 in line with the requirement of the North West Regional Spatial Strategy, which equated to 10,200 dwellings to 2026. Taking into account the 2,000 dwellings already completed (2003-10) this left a target of 8,200 dwellings (2010-2026).
- 5.3 The total provision set out in Policy S3, providing some limited flexibility for delivery beyond this figure, was for 8,800 dwellings. With 1,400 dwellings already with planning permission, Policy S3 identified provision for 7,400 dwellings from four main sources, each of which are examined in turn below:

Central Blackpool inner area development sites:	2,000
Other housing development sites identified in SHLAA	1,700
Windfall allowance for conversions	1,000
Strategic Development Site at M55 Hub/ Marton Moss	<u>2,700</u>
Sub- Total	7,400 dwellings
Sites under construction or with planning permission 1.4. 2010	1,400
Completions (2003-10)	<u>2,000</u>
Overall Total	10,800 dwellings

- 5.4 The starting point is that the target to find sites for 7,400 dwellings is no longer relevant. A realistic review is required of the need and opportunities for new housing based on Blackpool's own local assessment of what scale, types and locations of new homes are required.
- 5.5 The earlier RSS target previously supported by Blackpool Council (the Option 1 figure) was based on the capacity to deliver 8,000 dwellings to 2021. Projecting forward this required level of provision by a further 5 years to 2026 put increased pressure on delivery, requiring an additional 2220 homes on sites and opportunities within the tightly constrained local authority boundary.
- 5.6 National and local needs for substantial new homes remain, as evidenced by the regional projections, and by the priorities set out in the local Strategic Housing Market Assessment. However, the overriding consideration in Blackpool's circumstances is to realistically consider the potential capacity to respond to and deliver suitable opportunities in sustainable locations, with hard choices to make about remaining important areas of countryside. There is still a need to identify:
- Blackpool's housing requirement to 2027
 - A 5 year supply of readily available and deliverable sites
 - A 15 year supply of future sites post adoption of the Blackpool Core Strategy.

Blackpool Revised Core Strategy Housing Requirements to 2027

- 5.7 The more detailed re-assessment of potential sites from each of the identified above sources is set out in Appendix 2.
- 5.8 The first part of supply remains “*Sites under construction or with planning permission*”. Existing commitments from such sites will be updated to take account of actual changes –and is expected to increase to around 2,000 dwellings by 1.4.2011.
- 5.9 In summary the re-assessment of other potential future sites shows:

(i) Central Blackpool Inner Areas Development Sites

- 5.10 The allowance in Policy S3 of the Core Strategy was for 2,000 dwellings from central Blackpool inner area development sites (through regeneration/housing intervention/ market uplift).
- 5.11 The housing downturn will continue to have an impact both on the pace and scale of delivery of a new central Blackpool housing offer, with a reduced expectation of funding coming forward for housing intervention projects than was hoped for just twelve months ago.
- 5.12 However, a range of new housing opportunities can and will continue to come forward in central Blackpool, including private sector led development. The long term nature of the plan, the confidence that exists in the resort future, the overriding public support for change, and the fundamental need to maximize regeneration means the Core Strategy must continue to plan for substantial progress towards a new and better inner Blackpool housing offer.
- 5.13 *Conclusion: It is recommended the figure of 2,000 additional homes from resort regeneration should remain an outstanding target requirement and minimum aspiration of the Blackpool Core Strategy to deliver a longer term level of transformational change in its central core*

(ii) Other Housing Development Sites identified in the SHLAA

- 5.14 The allowance in Policy S3 of the Core Strategy was for 1,700 dwellings from other sites identified in the Strategic Housing Land Availability Assessment (SHLAA) within the existing urban area.
- 5.15 The opportunities available from these sites remain largely unchanged but, reflecting the current housing market downturn, in the short term delivery from such sites will continue to be lower than previously expected.
- 5.16 While expecting market uplift will bring a return to more normal levels of development from within the existing urban area, the longer the downturn continues the greater will be the impact in reducing completions from these sites in the period to 2027.
- 5.17 *Conclusion: It is therefore considered a slightly reduced allowance of 1,500 dwellings from such sites would be a reasonable and more realistic assessment of the dwellings expected to come forward from such sites at April 1st 2011.*

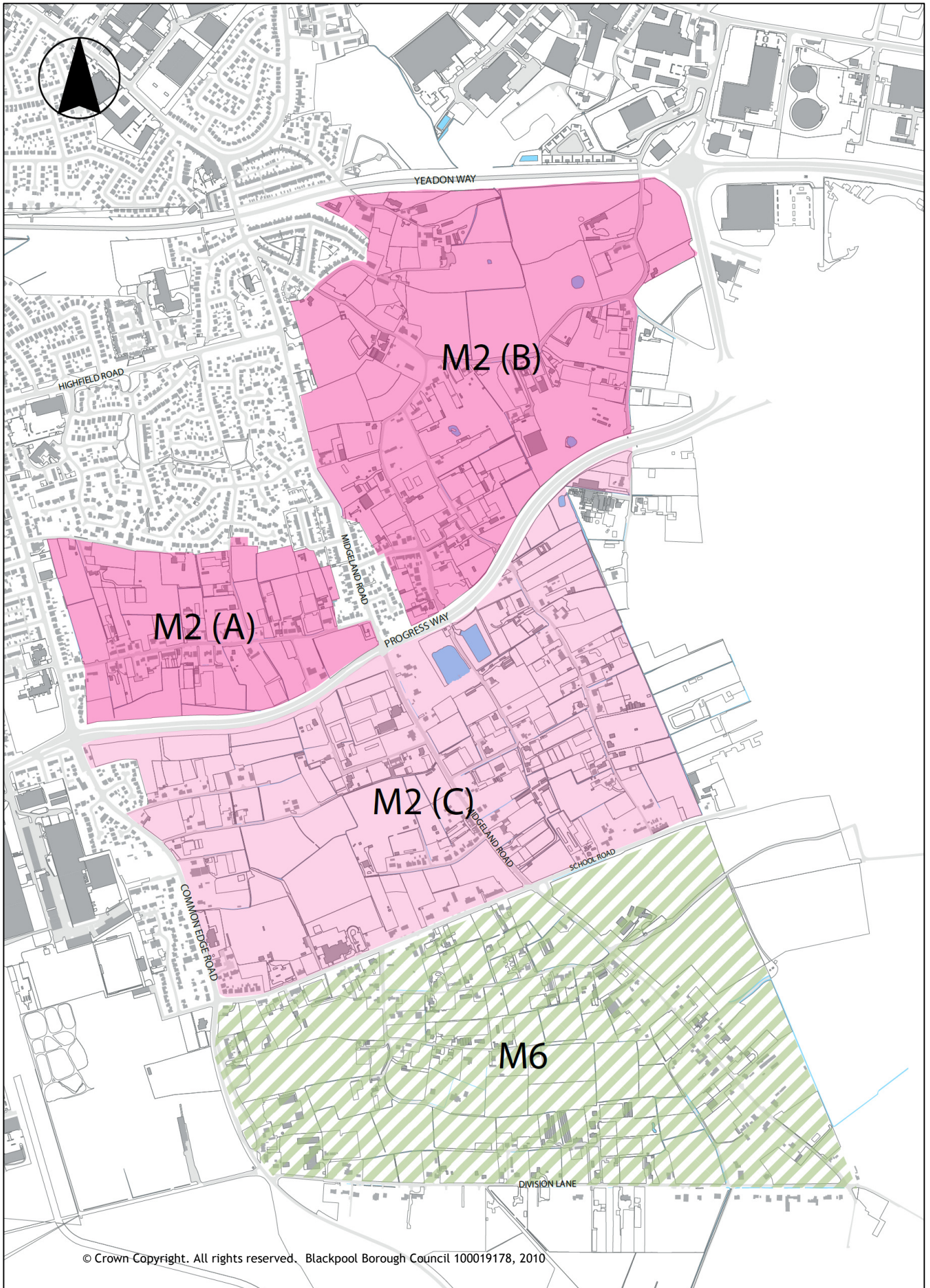
(iii) Windfall Allowance for Conversions

- 5.18 The allowance in Policy S3 of the Core Strategy was for 1,000 dwellings to come forward as a windfall allowance from conversions over and above existing commitments. No allowance for conversions is normally made in the first ten years of a Plan. The basis for an allowance in Blackpool is evidenced by the specific and very unique characteristics of its housing market.
- 5.19 The scale of recent conversions in Blackpool is largely a consequence of recent resort decline and therefore the allowance is more a forecast than a target need or requirement. However, while the Council is doing all it can to uplift the quality rather than the quantum of these dwellings, the scale of change in the inner areas will continue to include a substantial level of conversions.
- 5.20 *Conclusion: In these terms an allowance of 1,000 dwellings from conversions beyond the first five years of the plan should appropriately be maintained in the revised Policy S3 of the Blackpool Core Strategy*

(iv) Strategic Development Site at Marton Moss/ M55 Hub

- 5.21 The lands allocated in the Core Strategy Preferred Option at Marton Moss within Blackpool are shown on the plan overleaf, and comprise:
- Lands between Bennetts Lane and Progress Way to be included in the first phase of development to 2016.
 - Lands between Yeadon Way and Progress Way, east of Midgeland Road, to be included in Phase 2 post 2016,
 - Land between Progress Way and School Road to only be developed beyond 2021 in accordance with the on-going review of the Core Strategy.
 - Lands south of School Road to be included as an extension to the Green Belt in south Blackpool.
 - Lands at Whyndyke Farm in Blackpool allocated for mixed residential/ community use
- 5.22 The Core Strategy approach sought to meet Blackpool's need for the phased residential development of the lands between Yeadon Way and School Road in a way which recognises the specific qualities of Marton Moss, keeping the main infrastructure of quiet lanes and retaining the overall field pattern to develop small housing clusters which will enhance the future environment of the Moss.
- 5.23 Marton Moss is the only major area of undeveloped land within the Blackpool local authority boundary. If Blackpool is to provide the new homes it needs and provide a re-balancing of its overall housing market, some development of lands on the Moss is a necessity. However, this is the only substantive safeguarded remaining area of open countryside in Blackpool. Its importance in its own right has been emphasised in many of the public consultation comments, and clearly presents difficult choices and ultimately decisions which need to be taken.

Figure 12 - Policy M1, M2 and M6: Marton Moss



- 5.24 Arising from the public consultation process, it is evident there is a range of diverse views and a clear conflict between those who support the benefits of development on the Moss, and those who fundamentally do not.
- 5.25 Whatever the balance of housing development pressures versus concerns to protect the environment of the Moss, it is crucial that any way forward is also based on a realistic view of what scale of development is appropriate and realistic to be built over the timescale of the plan to 2027.
- 5.26 The recent approval of proposed residential development between Bennetts Lane and Progress Way (subject to an application for judicial review) already provides major capacity for development on the Moss in the current housing market. The need in the plan is to identify further sites and opportunities for development for 2016 -2027. In doing so the plan for the Moss is for the medium and longer term. While the current fragility of the housing market will not persist, a more cautious market for both buyers and lenders is the prospect.
- 5.27 On balance it is considered a substantial reduction in the proposed number of new homes would be more realistic given the current housing market and economic downturn; better meet and align Blackpool's own future need for homes and jobs - as well as enable a lower density, landscaped, greener and more organic format of development, focused on lands closest to and most readily integrated with the existing urban area.
- 5.28 However, it remains the case that some new development on the edge of Blackpool is fundamentally required to address the lack of wider quality new housing and provide better choice. A Moss approach to develop the areas of the Moss north of Progress Way will change its character to become part of the urban area rather than semi-rural, but the overall benefits of pursuing some sensitive and appropriate development on lands on the edge of Blackpool, rather than none, are considered to outweigh any disadvantages
- 5.29 The proposals in the Core Strategy Preferred Option relate to lands at Marton Moss within Blackpool, but also referred to wider scope for development at the "*M55 Hub Growth Point*" – with this a matter to be eventually determined by Fylde Borough Council as part of its own evolving Core Strategy process. Fylde Borough Council's public consultation response has expressed concerns it gave a higher level of commitment to wider development at the Hub than currently exists.
- 5.30 Wider responses from public consultation also commented on the need to ensure effective integration with employment expansion and economic development needs. Opportunities are already recognised in the Core Strategy of the potential provided by lands in the South Blackpool/ Airport strategic employment site.
- 5.31 Development on Marton Moss together with the supporting economic development opportunities from regeneration and continuing employment expansion of the Blackpool Business Park and other industrial estates close to the Airport within Blackpool represents a logical and deliverable way forward to form sustainable extensions to the existing Blackpool urban area
- 5.32 The Core Strategy included the allocation of lands at Whyndyke Farm within Blackpool for mixed residential/ community use. Much of this land has subsequently been granted outline approval for a new hospital and as such, in conjunction with the wider position related to lands in Fylde, is no longer required as a strategic allocation of the Blackpool Core Strategy.

- 5.33 *Conclusion: In response to public consultation, it is recommended that the revised Blackpool Core Strategy should more clearly focus and re-title its presentation of proposals within Blackpool as on "South Blackpool Sustainable Growth", instead of the "M55 Hub Growth Point".*
- 5.34 *Conclusion: The proposed number of new homes required on Marton Moss in the Core Strategy to be reduced from 2,700 to around 1,500 dwellings (including the existing land with planning permission), with Progress Way then providing a definitive, recognisable and clearly defined southern urban edge to Blackpool.*
- 5.35 *Conclusion: With outline approval of the new hospital development, the Whyndyke Farm lands within Blackpool to no longer be included as an allocation in the Blackpool Core Strategy*

South of Progress Way

- 5.36 The Core Strategy Preferred Option proposed the lands south of School Road as an extension to the South Blackpool Green Belt. A small number of public consultation responses support development south of School Road, but there was much wider general support for the extension of the Green Belt. However, there was also a substantial level of opinion, particularly from those who made more specific and detailed public consultation responses in support of some more limited freedom for development to support the improvement and regeneration of parts of the Moss.
- 5.37 The Moss lands whose lanes, hedgerows, remaining market gardens and grazing land are valued by many are seen by others as already very much undermined by the creep of urbanisation, encroaching roads, degradation, and traffic noise.
- 5.38 Alternative approaches for the lands south of Progress Way as a whole are:
- To continue the existing local Plan policy and longstanding allocation of the lands as countryside area
 - To propose some change in the development status of the lands in line with some of the representations to public consultation on the future of the Moss.
- 5.39 The longstanding policy basis for the allocation of the Moss as 'countryside area' and very restrictive approach towards new development was based on an absence of need for development – but awareness that the time would eventually come when a balanced judgement needs to be made about the long term need for development and/ or to protect some or all of the Moss. The Council has consistently been against a gradual piecemeal erosion of its remaining rural character, recognising the eventual need for a comprehensive planned strategy for the Moss at some time in the future.
- 5.40 The issue is whether it should continue to be safeguarded by a long term restrictive policy approach and review its status again at some time in the future, or whether - in conjunction with the development of lands to the north of Progress Way - there is a now a need to safeguard but also improve and enhance the appearance of the remainder of the Moss, rather than neglect the area until it is potentially developed at some date in the long term future.

5.41 *Conclusion* On balance in conjunction with the proposals for the lands north of Progress Way, the need is to pursue an approach to enhance and improve the appearance and support the long term future of the remaining lands south of Progress Way as part of a positive way forward for “Marton Moss” as a whole.

5.42 *Recommendations are made:*

To safeguard the predominantly more open green and distinctive character of the lands south of Progress Way

To maintain a restrictive policy towards the construction of new buildings

To relax the policy towards extensions and replacement of existing dwellings and the conversion of existing appropriate buildings which are consistent with its open and remaining rural character

To maintain open aspects across the Moss, remove eyesores, and pursue proposals for landscape and built enhancement which improve the interest and value of the Moss

5.43 Any such approach would need to be prepared and defined in more detail in the proposed Supplementary Planning Document (SPD) for the future implementation of new development across the Moss as a whole. Potentially, in terms of Policy S3, it is envisaged that around 200 dwellings could come forward from the lands south of Progress Way in the period to 2027.

BLACKPOOL CORE STRATEGY THE NEED FOR NEW HOMES TO 2026

APPENDICES

Appendix 1 Summary of Public Consultation

A total of 32 written responses and 10 questionnaire responses were received from residents specifically related to housing development issues. The issues raised by these responses are included in the main report, and the details of these responses are set out in more detail below.

- Appendix 1a Housing Development Issues Responses
- Appendix 1b Marton Moss Questionnaire responses

Appendix 2 Policy S3 Re-Assessment of New Homes to 2027

Name/Company	Address	Policy/Section	Comment
Blackpool Pleasure Beach	Ocean Boulevard Promenade Blackpool FY4 1EZ	S1	<p>Clarification required as to whether 'town centre and resort core' is a reference to Inner Area Regeneration on the adjacent Key Diagram.</p> <p>Suggest that 'town centre and resort core' in Policy S1 should be replaced with 'Inner Area Regeneration, as defined on the Key Diagram' to provide clarity to investors.</p> <p>This area should include the Pleasure Beach, which will be a major catalyst of resort regeneration.</p>
Lindsay Alder Highways Agency	City Tower Piccadilly Plaza Manchester M1 4BE	S1	<p>Supportive of providing new development within the existing centre and resort core, where existing sustainable transport networks and services are already present and where the need to travel, particularly by private car is minimised.</p> <p>Has greatest concern in terms of the M55 Hub proposals for the sustainable accessibility of the area as it is currently poor and the scale of development proposed is likely to generate a significant number of trips, which given the sites proximity to Junction 4 of the M55, could be detrimental to the safe and efficient operation of the Strategic Road Network.</p> <p>Considers that it is even more critical that the potential impact of development is assessed and the delivery and requirements of infrastructure are determined to ensure that the strategy as a whole is not compromised by undeliverable and unsustainable strategic development.</p> <p>The Agency is aware of the modelling work being undertaken in order to test the development impact and consider the scale and type of associated transport provisions and expect that this</p>

			information will be made available to review as soon as possible and particularly prior to consultation on the Publication draft.
		S3	<p>The Agency was previously supportive of delivering new residential development in line with RSS requirements and it is expected that whatever local housing target is taken forward, either based on existing provisions, reverting back to Option 1 Figures, or a new approach, that it is based on robust evidence and is commensurate with an identified level of need and able to be sustainably delivered.</p> <p>The Agency's main concern is that new housing development is sustainably accessible and is therefore generally supportive of providing new residential development within the Central Blackpool inner area, where there is best access to a variety of sustainable transport options, employment opportunities, services and facilities. The Agency is also supportive of focussing higher density housing development along the main sustainable transport corridors and at key transport hubs and interchanges.</p> <p>The proposal for 2,700 new dwellings at the M55 Hub provides the greatest concern for the Agency given its proximity to the SRN. The scale of housing development proposed when considered independently, could have the potential to generate a significant number of trips and when considered cumulatively with other development proposals such as new employment opportunities, this is only going to exacerbate this issue. It is therefore important to ensure that any measures such as new or improved sustainable transport provisions or infrastructure are sufficient to accommodate or mitigate the potential cumulative impacts of development. The Agency will be able to provide further detailed comment as and when the traffic modelling work is made available for review.</p>

		S4	<p>The Agency considers that in addition to phasing the future release of housing sites in accordance with Blackpool's dual focus on regeneration and growth, that new housing sites are appropriately phased and aligned with the delivery of new or improved infrastructure / sustainable transport provisions which are required to support the delivery of new housing sites. This is particularly essential for the new housing growth proposed for the edge of Blackpool and in particular at the M55 Hub strategic development sites where new physical infrastructure and improvements may be required (subject to the findings of the associated modelling work) and where new supporting sustainable transport provisions and other community facilities and services will need to be delivered to support the proposed housing growth.</p>
		M1	<p>The development proposed at Marton Moss / M55 Hub is likely to have the most significant impact for Agency out of all the development proposed within the strategy, given the proximity to Junction 4 of the M55 and the generally unsustainable location with regards to existing levels of sustainable accessibility and the lack of sustainable transport provisions.</p> <p>The Agency expects that the implications for transport and infrastructure, particularly with regards to the increase in trip generation and the requirements and deliverability of supporting infrastructure will have been identified and appropriately assessed. At the time of this response the traffic modelling being undertaken in support of the Hub was not available for the Agency to review. The Agency will expect that this information will be made available as soon as possible and particularly prior to consultation on the Publication draft.</p>

		M2	Consideration needs to be made when phasing new housing development as to how it will be co-ordinated with the delivery of supporting infrastructure. The Agency therefore considers that it is essential to identify how new housing sites will be phased and aligned with the delivery of new or improved physical infrastructure / sustainable transport provisions which are required to support the delivery of new housing sites. This is particularly pertinent for the M55 Hub strategic development sites where new and improved physical infrastructure may be required and where new supporting sustainable transport provisions and other community facilities and services need to be delivered to support the sustainable delivery of the proposed housing growth.
		M55 Hub	Whilst the Agency has some concerns regarding the scale of development proposed at the M55 Hub and the potential impact on the operation and safety of the SRN, the sustainability aspirations are supported, particularly with regards to providing community facilities within walkable distance from jobs and homes and improving bus services and sustainable patterns of movement.

Janet Belfield Natural England	Hornbeam House Electra Way Crewe	S1	<p>Welcome a specific policy that directs development to particular parts of Blackpool.</p> <p>However, not supportive of policies that may lead to loss of urban gardens and other green space.</p> <p>The requirement for on site public open space should only be relaxed where there is a clear plan to provide new open space in a suitably accessible location. Would welcome a link to the green infrastructure policy.</p>
National Grid		S1	Supports the identification of the M55 Hub as a focus for growth and expansion.
Richard Camp Lancashire County Council	County Hall PO Box 100 Preston PR1 0LD	S1	<p>The overall approach is welcomed and reflects that set out in their previous response to the Issues and Options consultation. The success of the Core Strategy will be dependent on linking the regeneration of Blackpool's urban core to the planned growth at M55 Hub.</p> <p>Support the approach of regeneration of the Urban Core and the promotion of the M55 Hub of the growth point in principle. Note that the planned growth set out is dependant on the support of Fylde Borough Council, which at the time of publication has not been confirmed.</p>
		S3	The provision for housing has been based on the annual provision set out in the revoked RSS. If these figures are to form the basis of the Core Strategy as it is taken forward to the examination stage, then they will be need to be supported by an appropriate evidence base.
		S4	This approach is welcomed although it needs to be reflected in policy G5, which appears to suggest that affordable housing should be provided on site. Overall the relationship between the edge of town growth and urban regeneration needs to be set out

			further within the LDF, possibly through the proposed joint DPD with Fylde Council regarding the hub proposal.
Closelink Ltd		M1	The lettering/notation of the various sites is not clear.
		S1	Fully support this policy specifically reference to the M55 Hub as a strategic location for growth and expansion. Cross boundary recognition should be made.
		S3	Fully support of the inclusion of the M55 Hub as a strategic development site and the reference to the number of dwellings to be accommodated. However they re-iterate the cross boundary nature of the development.
		M1	Supportive of reference to site D. Suggest that more emphasis should be placed on the fact that it is a cross boundary site with the smaller percentage being located in Blackpool's boundary. The allocation of site D in isolation does not portray the full picture. Reference should be made to residential on site D in conjunction with development of a mental care hospital. No figure is identified for the potential number of dwellings on the site, which should read as 100 for site D.
		M2	This policy does not refer to the Whyndyke Farm site in the phasing schedule and fails to reflect the fact that the sustainable extension must be considered holistically. Any phasing of development must be considered for the M55 Hub Growth Point as a whole and be agreed by both Councils.
Rashmi Pandav Blackpool Congregation of Jehovas Witnesses	9 Lowthorpe Crescent Preston PR1 6YE	S1	In the paragraph commencing 'Tourism and leisure.....'. Suggests the paragraph should expressly state the need for 'community facilities' Suggests reference is made to the secondary use of surplus/unused/derelict industrial or commercial land for

			community uses.
		M1	Welcomes and support the reference made in Area D to community uses at Whyndyke Farm. However, notes that Areas A-C will require an allocation of community uses and timescales.
The Noble Organisation	1A Dukesway Court Gateshead NE11 0PJ	S1	State that the policy is too vague and should not be applied to frustrate the improvement of existing facilities. All development needs to be realistic and deliverable.
Gillian Wilsden	82 Withnell Road Blackpool FY4 1HE	S1	Concerned that there is very limited open space, and there is a danger that very soon Blackpool will have no green areas at all, and eventually there will be no distinguishing areas between destinations. Whilst I appreciate that more housing is required, it seems a shame that existing areas cannot be utilised instead of Green Belt disappearing for ever.
Blackpool LSP Environment Sub Group	C/O J Marsh Lutra House Dodd Way Preston PR5 8BX	S3	Given that the regional housing targets have been scrapped with the cancellation of the Regional Strategy, the group question whether this level of housing provision to 2026 is still required. They raise concerns that the development industry will choose to develop the 'easy' (greenfield) sites in preference to the regeneration of the urban core. Future housing provision must be delivered in accordance with Policy S4 to ensure that the regeneration of the urban core takes place. Would like to see a commitment that existing permissions and regeneration/SHLAA sites are developed before further development takes place at Marton Moss beyond 2016.
		M2	A Surface Water Management plan is being prepared; however, as yet no plans have been produced that show significant infrastructure capacity issues with regards to foul and surface waters can be resolved. Whilst mention is made in Policy M2 of a phased approach to the development at Marton Moss, unless a plan is in place to deliver

			<p>improvements to the drainage network, all that will be achieved is gradual further deterioration of water quality from illegal discharges from the sewerage network. In order to avoid this and a significant deterioration in bathing water quality (and resulting impact on tourism) the group considers that the issues around foul and surface water capacity must be resolved before any commitment is given for a large scale expansion of Blackpool. Would wish to see the proposed solutions from the Surface Water management Plan agreed and a commitment to deliver these as part of any plans to expand Blackpool. These must be in place before the Core Strategy is submitted to the Secretary of State.</p> <p>No mention is made in the Core Strategy to the Water Framework Directive, which requires all water bodies to reach good ecological status/potential.</p>
Paul Daly Sport England	Building 3 Universal Square Devonshire Street Manchester M12 6JH	S3	<p>It is likely some potential locations and / or sites include playing fields or other land and buildings used for sport and recreation.</p> <p>Sport England emphasise here that PPG17 states that existing open space, sports and recreational buildings and land should not be built upon unless an assessment has been undertaken which has shown the land or buildings to be surplus to requirements, or replacement open space, sport or recreational facilities are provided. With regards to playing fields, PPG 17 and Sport England's Playing Field Policy oppose development of playing fields in the absence of a PPG17 compliant robust assessment of need unless the requirements of specific exceptions are met.</p> <p>The exact impact of the protection offered by PPG17 to locations identified in the core strategy and sites included within the various</p>

			supporting studies is unclear without reviewing each individual site. In light of this, Sport England make the point that some locations and sites which have been identified for development, say to meet employment or housing land requirements, might themselves need replacement provision, and that land requirements for such replacement provision should be made explicit either in the studies, and / or in broad terms in the core strategy.
		M1	<p>Policy M1 identifies four sites to be allocated for residential development which include existing sports facilities such as football pitches, school playing fields, tennis courts, and equestrian facilities. Whilst the text following the policy makes clear that the intention is not for comprehensive redevelopment of these areas, the policy itself would appear to suggest that the principle of residential use on a site which is currently used for sport would be acceptable.</p> <p>In Sport England's experience, housing allocations which have not made explicit reference to existing sports facilities have proved to be contentious. In light of this Sport England would wish to see the policy amended to make explicit that existing sports facilities would be safeguarded.</p>
Hay Hill Ltd	18-22 Wigmore Street London W1U 2RG	S3	Concerns raised in relation to the accuracy of draft housing figures which were contained in the now revoked NWRSS.
Mr Ade Alao Blackpool, Fylde & Wyre Economic Development Company		S3	States the proposed figures appear to be based on NWRSS 2008 requirements which have now been revoked. An alternative methodology will need to be identified.
		Spatial Vision	The Airport Corridor and M55 Hub will offer opportunities for diversification through balanced housing and employment growth.
Muse Developments Ltd		S3	States that the Talbot Gateway redevelopment including an

			<p>element of new housing will not only assist the Council in achieving its housing targets but will also contribute to achieving the wider objective of re-using Brownfield sites.</p>
<p>Phil Smith Government Office Northwest</p>	<p>City Tower Piccadilly Plaza Manchester M1 4BE</p>	S3	<p>Notes that Policy S3 includes a 1000 windfall allowance for conversions, for dwellings expected to be created as a consequence of Blackpool's declining guest house areas.</p> <p>PPS3 para 59 states that allowances for windfalls should not be included in the first 10 years of land supply unless LPAs can provide robust evidence of genuine local circumstances that prevent specific sites being identified.</p> <p>In these circumstances, an allowance should be included but should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends.</p> <p>Recommends that, if there are genuine local circumstances that prevent specific sites being identified in years 5 to 10, the Council need to provide more justification, in line with PPS3 para 59.</p>
		S4	<p>Regarding the 'phased potential' boxes on page 33, GONW would like to see an explanation of how the Council proposes to adhere to these figures in order to maintain the dual focus of "regeneration and growth".</p> <p>Enquires what action will be taken if resort regeneration sites do not come forward as envisaged here, but Marton Moss sites do.</p> <p>Suggest it would be useful if more information were included in Policy S4 to explain how the dual focus aim will actually be implemented.</p> <p>A housing trajectory should be included in the Core Strategy.</p>

Ian Wray Northwest Regional Development Agency	Renaissance House Centre Park Warrington WA1 1QN	S3	The Council will need to have regards to the revocation of the RSS figures in restabilising the level of housing provision required.
		M55 Hub	<p>Policies in Chapter 6 focus on residential development and supporting community facilities with little emphasis on employment.</p> <p>The SA focuses on the implementation of providing 2700 houses at the M55 Hub, rather than its potential economic benefits. Suggest it would be helpful if the Core Strategy provided some indication of the amount of employment land that could be provided as part of the overall mix of uses both within Blackpool and in the M55 Hub as a whole.</p>
Mr G Payne Wyre Borough Council	Civic Centre Breck Road Poulton-Le-Fylde FY6 7PU	S4	Consideration needs to be given to the phasing mechanism and how this relates to previously developed land indicative targets as identified in Table 7.1 of the adopted Regional Spatial Strategy. This is a joint indicative target of 65% between Blackpool, Fylde and Wyre, which should also be referenced as an indicator in section 8 (Delivery and Implementation Plan) of the Core Strategy.
Ms Angelia Hinds	21 Moss House Road Blackpool FY4 5JF	M1	All housing figures from the RSS will have to be revisited in the Core Strategy and SHLAA and reasoning behind the proposed development at Marton Moss and the M55 Hub.
		M1	<p>In the light of recent Government changes and revocation of the RSS housing figures, it is unlikely that Fylde Council will continue with their Core Strategy. Asks it the Blackpool Core Strategy will be revised to include alternative proposals, such as the inclusion of additional schools and employment areas?</p> <p>Also asks when the joint SPD with Fylde will be produced.</p>
		M2	Queries whether inner regeneration needs to keep pace with development on the periphery. Suggests conflicting statements have been made in the document.
		M2	Queries whether Area A should be included in the policy as the

			land has now received outline planning permission.
		G7	The development of the Moss goes against this policy and will go no way to safeguarding the remaining areas of open land and attractive landscaping which exists in the Borough.
D Challinor	8 Glencross Place Blackpool FY4 5AD	M1	<p>Opposed to the proposals for Marton Moss because:</p> <ol style="list-style-type: none"> 1. Contradicts current trend for green policy and will lead to the removal of one of Blackpool's few green areas. 2. No plan for where the new population will find employment. 3. It would be wiser to utilise redundant hotels to reach the required housing numbers.
Lesley M Bosworth	36 Haig Road Blackpool FY1 6BZ	M1	<p>Objects to the proposals for Marton Moss:</p> <ol style="list-style-type: none"> 1. Building on Marshy land can be disastrous. 2. This green area should be protected. 3. Large amount of objections by local population.
Kensington Developments	94 Park View Road Lytham FY8 4JE	M1	Support the broad locations for development. The number of dwellings should reflect the capacity of the sites rather than being an arbitrary figure.
		M2	<p>Not supportive of strict phasing. Consider that development of sites B and C post 2016 would adversely impact on the continued supply of housing.</p> <p>The ban on conversions and infill is considered to be contrary to national guidance and contrary to the stated output from such conversions in Policy S3. Such small scale development would not, if submitted, prejudice the principles of the M55 Hub.</p>
Mr Joe Chabba		M1	<p>Supports proposals for the M55 hub provided:</p> <ul style="list-style-type: none"> • Housing has green areas and off street parking.

			<ul style="list-style-type: none"> • Scenery is retained • Developers have an interest in the local community • The roads should be widened • There should not be any compulsory purchases
Ms Vicki Gale	22 Alexandra Road Blackpool FY1 6BU	M1	Concerned that the scale of the Council's proposals for development on the outskirts of the town – especially Marton Moss. Consider them unwise environmentally and economically and risk diverting resources and focus on the need to regenerate Central Blackpool rather than planning communities focused rather on shopping and spending towards Preston than in Blackpool.
Rachel Welsby Environment Agency	Lutra House PO Box 519 Preston PR5 8GD	M2	State that although phasing of sites may help in the provision of infrastructure and it may not be the solution. The Environment Agency do not want to see an increase in volumes of surface water discharged into the combined system and if the system is intended to accept increases in foul sewage, then it will be necessary to reduce the volumes of surface water discharging to the system
Ms Anne Frith	Runnell Cottage Chapel Road Blackpool FY4 5HS	M2	States that it is important to develop new areas for housing to keep a community in Blackpool. There is a transient population in Blackpool and areas such as Marton Moss and South Shore provide stability. Many parts of the Moss are neglected. Development would provide improvements to the area.

Sainsbury's Supermarkets Ltd		M55 Hub	Acknowledge that this is a concept masterplan and has not yet been agreed by Blackpool and Fylde Councils but support the aspiration for this sustainable urban extension. Sainsbury's believe this is a key forthcoming area of development that will assist Blackpool in achieving its aspired status and growth.
Lancashire County Council Estates Team	County Hall PO Box 26 Preston PR1 8RE	M55 Hub	Major landowner within M55 hub. Site suitable and available for development within 5 years. Actively investigating options to facilitate the completion of the M55-Heyhouses link.
Mrs Kathryn Rooney	12 Hardwicke Road Narborough LE19 3LW	M55 Hub	<p>Queries the use of phasing for housing development at the Moss/Hub.</p> <p>Suggests the costs to improve the sewers and drainage could be shared between several developers as it in other areas in the country.</p> <p>Asks whether limiting development by 1200 dwellings until 2021 or beyond will not meet the required housing targets. Most of the land on Marton Moss is fallow land and is no longer used for agricultural purposes.</p> <p>Supportive of a Park and Ride system which would reduce traffic congestion and encourage people to purchase property in this area.</p>

			Suggests there is a shortage of 'executive' housing in Blackpool and developing land on the Moss would facilitate expanding this type of housing.
Hugh Evans North and Western Lancashire Chamber of Commerce	1-2 Lockheed Court Amy Johnson Way Blackpool FY4 2RN	M55 Hub	Fully supportive of the aims and objectives. Improvements need to be made to Yeadon Way gateway.
Karen Taylor	Themis Chambers Suite 14067 145-147 St Johns Street London EC1V 4PY	M55 Hub	Comments that there is no need for housing development on Marton Moss. Consider that any development on the Moss would conflict with policies S6 and S7.
Mr John Ashworth	Runnell Farm Chapel Road Blackpool FY4 5HS	M55 Hub	Supportive of the redevelopment of Marton Moss providing it is done in a way that complements the existing character the area. The redevelopment of Inner Blackpool is also supported and this can be assisted financially by a contribution from the developers at Marton Moss.
Mrs E R Ashworth	Runnell Farm Chapel Road Blackpool FY4 5HS	M55 Hub	Supports the sensitive and original approach to the development of Marton Moss.
Mr M Evans Assistant Director: Planning Services Fylde Borough Council		S3	The RSSNW is now no longer relevant and consequently it is recommended that emerging policies be reviewed in light of the forthcoming national planning policy framework. There is now an opportunity for Blackpool Council to review the level of growth it was striving to accommodate. In particular the revocation of top-down regional housing targets require the borough housing need to be justified both locally and in a sub-regional context. This clearly has implications for the M55 Hub Growth Point.

			Policy S3 provides for 10,800 dwellings against a requirement of 10,200 dwellings. Whilst being mindful of Blackpool's tight boundary, there appears to be no justification for the uplift of 600 dwellings.
		S4	On page 33 queries why the three phasing boxes total to 8,600 over the period 2011 - 2026 when the requirement expressed in the trajectory above is 8,000 dwellings over the same period.
		M55 Hub	<p>Do not support the M55 Hub. If it is to be an option at all for Fylde, it would have to be considered as one amongst a number of other spatial options. Fylde Borough Council is yet to publish its Issues and Options Core Strategy Paper.</p> <p>Furthermore the Council cannot, at the time of writing, support the associated Joint SPD.</p> <p>States the M55 Hub is dependant upon a critical mass of development taking place if it is to be considered at all viable. The DLA Draft Final Report now shows an indicative residential capacity of approximately 5,000 dwellings, not 7,000. In view of the comments made previously in respect of the Spatial Strategy it may now be relevant to question if there may be a further reduction in both housing numbers and employment land requirements.</p> <p>Comment made that the Preferred Option does not adequately demonstrate that lands in Blackpool at the M55 Hub can be delivered in isolation.</p>
		M1	Page 90, Figure 11: Suggest the area on the Fylde side should be

			<p>shown as either hatching or not at all, rather than a detailed master plan which should be shown on the Blackpool side. If shown as per page 25, Figure 5, this would help to draw a distinction between the two parts given the fact that the M55 Hub concept has not yet been agreed as an option in Fylde. If, as suggested at page 93 para 7, a 'Blackpool Only' version of the growth at the end of the M55 can be delivered then my suggestion is even more pertinent.</p>
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Blackpool Council

Core Strategy Preferred Option and Marton Moss/M55 Hub

Public Exhibitions

Event Venue: Our Lady of The Assumption Church Hall, Common Edge Road

Date: Thursday 17th June 2010

Time: 2pm-8pm

Council Officers Present:

Planning

Graham Page (Core Strategy Manager)
Helen Duignan (Planning Officer)
Katie Invernion (Assistant Planner)
Keeley Briggs (Assistant Planner)
Keith Keeley (Neighbourhood Plans Manager)

Number of Attendees Recorded: 21

Public consultation/ Exhibition summary

The Marton Moss/M55 Hub consultation event specifically focussed on the proposals in the Core Strategy relating to new housing provision in Blackpool.

Generally there was little support for the proposals for new housing development on the Moss/M55 Hub

There was broad support for the

Summary of responses

Core Strategy

Against proposed new homes on Marton Moss. Prefers the upgrading of Foxhall and other rundown parts of the town.

Entrances into the town need to be enhanced to give a better approach.

The guesthouse era is finished and Blackpool needs to recognise this.

Agreement with the Green Belt extension

Would like to see more Park and Ride facilities and improved bus services

Agree that employment markets could be addressed on part of M55 Hub

Conferences can be counter-productive due to the cost of security and disruption to local facilities.

There is a need for new conference facilities.

Too many hard surface across Blackpool. We need more greenery

Supportive of plans to prevent HMO's

Short term solutions needed to 'tidy up' areas

There should be a mix of holiday and residential across all areas.

Open space should be provided north of school road

Marton Moss/M55 Hub

General agreement with the Green Belt extension.

Marton Moss is an important green area for people who live in the area.

Housing development would destroy the character of the Moss.

Inners area regeneration should be the priority

Where will the demand be for all the new houses?

Brownfield development should be explored before greenfield

Green areas should be retained

What about employment growth?

New housing is not required. It can be achieved without developing greenfield sites. There is a shortage of affordable and social housing only.

The land could be used for allotments, eco tourism and parks rather than housing.

Marton Moss Questionnaire responses

	Yes	No	No Answer
Q1 Do you agree there is a need for some new housing to meet the needs, over and above the range and scale of housing that can be provided in Blackpool's Inner Areas?	0	9	1
Q2 Do you agree with the reasons set out of why Blackpool needs supporting growth?	3	2	5
Q3 Where do you consider the needs for new housing should be best met?			
In the main towns and cities	9	0	1
On the edge of main towns and cities	1	6	3
In or on the edge of smaller towns and villages	2	5	3
In the countryside	0	7	3
In Green Belts or other areas with special protection	0	7	3
Q4 Within Blackpool, do you agree with the focus for new housing on the following areas?			
Central Blackpool inner area development sites	10	0	0
Other sites elsewhere in the urban area	7	3	0
Conversion of existing properties	10	0	0
New housing at Marton Moss/M55 Hub	0	10	0
Q5 Would you support the concept of wider development of the M55 Hub including lands outside Blackpool	1	9	0
Q6 On the Moss within Blackpool, do you support the development of:			
Lands between Bennetts Lane and Progress Way	0	9	1
Lands between Yeadon and Progress Way	0	9	1
Lands between Progress Way and School Road	0	9	1
Q7 Do you support the extension of the Greenbelt south of School Road?	7	3	0

Core Strategy Questionnaire Responses for Marton Moss

	Yes	No	No Answer
Q1 Do you agree with the Vision?	7	0	0
Q2 Is it realistic?	3	3	1
Q5 Do you agree with the following Plan aims?			
<i>Sustainable regeneration, diversification and growth</i>	5	0	2
<i>Maximising regeneration</i>	7	0	0
<i>A balanced Healthier and Greener Blackpool</i>	6	1	0
<i>Providing supporting growth</i>	2	4	1
Q7 Have the Town Centre major priorities been correctly identified?	5	2	0
Q8 Have the Resort Renaissance major priorities been correctly identified?	4	2	1
Q9 Have the M55 Hub/Marton Moss major priorities been clearly identified?	1	5	1
Q10 Do you think that there is too much holiday accommodation in Blackpool?	7	0	0
Q11 Do you support the safeguarding of the Key Promenade Hotels and Frontages (policy R18)?	6	1	0
Q12 Irrespective of the boundaries, do you agree with the policy approach for Holiday Accommodation areas (policy R19)?	5	1	1
Q13 Have the balanced and greener Blackpool priorities correctly identified?	2	3	2

Appendix 2

Policy S3 Re-Assessment of Sites for New Homes to 2027

Policy S3 identified provision for 7,400 dwellings from four main sources, each of which are examined in turn below:

Central Blackpool inner area development sites:	2,000
Other housing development sites identified in SHLAA	1,700
Windfall allowance for conversions	1,000
Strategic Development Site at M55 Hub/ Marton Moss	<u>2,700</u>
Sub- Total	7,400 dwellings

Sites under construction or with planning permission 1.4.2010	1,400
Completions (2003-10)	<u>2,000</u>
Overall Total	10,800 dwellings

Note: The first part of supply remains “*Sites under construction or with planning permission*” which at 1.4.10 comprised 1,400 dwellings.

This figure will be updated to take account of expected changes to 1.4. 2011 based on the latest information available, when the revised Core Strategy is finalised early in 2011. With low levels of completions and continuing planning permission coming forward – the total number of committed dwellings is expected to substantially increase to over 2,000 dwellings.

The review of the other future sources of supply as identified above is dealt with in turn in Appendix 2 below:

It will remain a matter for future funding bids and the response to them to determine what scale of housing led intervention projects may ultimately be delivered in Blackpool by 2027, and, balanced alongside this, private sector confidence will determine the extent to which market led schemes including potential seafront and town centre redevelopment schemes may come forward.

Even in the short term, however, there remains substantial prospects that a range of new housing opportunities can and will continue to come forward in central Blackpool. The demise of the proposed College relocation and potential changes in the delivery of the Talbot Gateway may lead to increased opportunities for a more substantive housing development on both these sites. The increased strength of interest in the potential for seafront and near seafront development also remains encouraging.

At the meeting of the Council's Executive on 11th March 2009, following a report which reviewed the priorities for new development within Blackpool's central area, it was concluded that the Core Strategy delivery of 2,000 new homes (as set out now in Policy S3) was the highest figure of net additional homes from inner area regeneration that could appropriately and tenably be put forward.

The initial longstanding bid of £35 million that has still not been secured from the HCA (Homes and Communities Agency) was appraised as funding no more than about 400 homes, and it was estimated that the potential delivery of around 2,000 additional new homes from regeneration in the resort core would require around £180 million public funding. These figures were drawn from the work done by GVA Grimley on behalf of the Council to assess the options and costs relating to housing intervention.

The current situation now faced at October 2010 is that there remains some hope and confidence that a level of funding will still be forthcoming to address Blackpool's priority needs. Equally there remains confidence a level of private sector led development will continue to come forward. The long term nature of the plan, the confidence that exists in the resort future, and the overriding public and wider support for change in the inner areas still means the Core Strategy should seek to progress towards this target and that, over the period of a 15-20 year plan, it should not be reduced.

Conclusion: To maintain the figure of 2,000 additional homes from resort regeneration as an outstanding target requirement and minimum aspiration of the Blackpool Core Strategy to deliver a longer term level of transformational change in its central core

(ii) Other Housing Development Sites identified in the SHLAA

The allowance in Policy S3 of the Core Strategy was for 1,700 dwellings from other sites identified in the Strategic Housing Land Availability Assessment (SHLAA) within the existing urban area. A substantial concentration of future development on existing urban sites was fully supported by public consultation.

A number of representations made comments about the Rigby Road site (previously proposed for the relocation of the Blackpool Fylde College Campus) which could deliver a significant level of residential development as part of any future scheme – but effectively the allowance made for this site directly replaces that previously made for potential redevelopment of the Blackpool and Fylde College (Bispham site).

In overall terms the identified capacity within the existing urban area from all such sites remains very much the same as a year ago – and no other major new previously unidentified “windfall” sites have subsequently come forward.

The identified capacity in the 1st April 2010 SHLAA of 6,334 dwellings includes the 953 new build dwellings with planning permission at this date and potential allowance for the development of a further 5,400 dwellings equally split between other existing urban sites and those sites on Marton Moss (2,700 dwellings) identified in the Core Strategy.

The SHLAA identifies potential housing sites and it does not imply that each of these sites will get planning permission or eventually be built. It includes a number of sites which are vacant, or underused, but also many sites which remain in existing use. It also specifically includes an allowance for (600 dwellings) from potential regeneration schemes within the existing urban area.

The Policy S3 figure of 1,700 dwellings to be provided from other SHLAA sites within the urban area represented the potential completion of over 80% of the around 80 such sites (for around 2,100 dwellings) identified in the SHLAA in the expectation that over the length of the plan period a majority of the identified sites would come forward for development, or potentially be replaced by new windfall sites identified in future.

The basic position remains the same, but in the continuing circumstances of the current housing market downturn, it is evident that many sites are being land-banked by developers until there is confidence there is an improved market for their delivery. Equally, the likelihood and attractiveness of redeveloping sites which remain in some level of existing use, such as backland commercial uses, has also decreased.

In all these terms it is considered that in the short term delivery from such sites will continue to be lower than previously expected. While expecting a market uplift will bring a return to more normal levels of development from within the existing urban area, the longer the downturn continues the greater will be the impact in reducing completions from these sites in the period to 2027.

Conclusion: It is therefore considered a slightly reduced allowance of 1,500 from such sites would be a reasonable and more realistic assessment of the dwellings expected to come forward from such sites at April 1st 2011.

(iii) Windfall Allowance for Conversions

The allowance in Policy S3 of the Core Strategy was for 1,000 dwellings to come forward as a windfall allowance from conversions over and above the existing conversions at 1.4.10 with planning permission.

Questions were raised by the Government Office in their consultation response that detailed justification would be needed to justify a high windfall conversions allowance, no allowance for which is normally made in the first ten years of a Plan.

While this is the case, the basis of national guidance on housing is precisely that - no allowance should *normally* be made. The specific and very unique characteristics set out in Blackpool's Housing Monitoring Report 2010 show the scale of new dwellings coming forward from conversions, and provide clear evidence of Blackpool's firm basis for making such an allowance.

The average level of conversions completed 2003-10 was 87 dwellings, with 148 further conversions granted permission in the last 12 months. In addition the Housing Monitoring Report shows high numbers of dwellings have come forward from certificates of lawful use (743 dwellings) and from evidence of other changes from council tax records, which have subsequently been viewed as permitted uses, but occurred without the benefit of planning permission.

In all these terms their scale of impact readily meets the exceptional circumstances to justify making an allowance for conversions. A continuation of existing trends, looking only at existing completions from planning permissions, making no allowance for certificates of lawful use, and making no allowance for the first 5 years 2010-15 (when the existing 419 outstanding planning permissions will potentially be implemented) remains the basis for an allowance of around 1,000 new dwellings from conversions.

Such a major impact could not previously be ignored as a main contribution towards meeting Blackpool's Core Strategy housing requirement. Despite the cancelling of the regional housing requirement, the conditions and statistical justification for these figures remains the same.

What is now open to question with the move towards local housing targets, is the extent to which "in terms of need" this should any longer be identified as a requirement. The scale of recent conversions in Blackpool is very largely a consequence of recent resort decline – but, while the Council is seeking higher standards, many conversions to date have been lower quality multi-flatted premises which have aggravated housing conditions and added to the problems of remaining holiday properties in the inner area.

To this extent the allowance for conversions is more a forecast than a target need or requirement. However, while the Council is doing all it can to uplift the quality rather than the quantum of the contribution these dwellings make to Blackpool's housing figures, the scale of change in the inner areas will continue to include a substantial level of conversions – with anticipated continued contraction in the holiday accommodation sector, which is generally recognised remains substantially above the level of provision needed to meet current visitor needs

Conclusion: In all these terms the specific allowance of 1,000 dwellings from conversions beyond the first five years of the plan is recommended should appropriately be maintained in the revised Policy S3 of the Blackpool Core Strategy

(iv) Strategic Development Site at Marton Moss/ M55 Hub

Wider Development

The outstanding issue therefore becomes the extent to which the Core Strategy should allow for further supporting development on the edge of Blackpool and specifically, given the clear constraints of the boundary, on lands at Marton Moss.

The approach in the Core Strategy Preferred Option also sought to provide the flexibility and scope for wider development at the M55 Hub on lands in Fylde – with this a matter to be eventually determined by Fylde Council as part of its own evolving Core Strategy process.

The Core Strategy Preferred Option was founded on the basis that whatever proposals are determined in Fylde, proposed development on lands on Marton Moss still represents a logical and deliverable extension of the Blackpool urban area - whether there was substantial or very limited development on the Fylde side of the boundary.

The two main reasons for this are:

- The lands at Marton Moss are not typical open countryside, and already have something of a Blackpool ‘urban fringe’ rather than rural character, with a multitude of ownerships, small plots of land, and existing dwellings dispersed across much of the Moss area. As such the proposed development lands are specifically allocated for “residential” development in Policy S3 of the Core Strategy Preferred Option as they:
 - comprise those closest to and most readily integrated to form a sustainable extension to the Blackpool urban area.
 - do not provide sufficient undeveloped open lands which realistically are available or can be considered for wider alternative uses.
- Secondly, detailed decisions on the allocated lands will be effectively coordinated with whatever decisions are made on the Fylde side of the boundary. The Core Strategy set out that no further development will be permitted until post 2016 and must be part of a comprehensive wider strategy based on a full assessment of the future required scale, nature, phasing and impacts of the wider M55 Hub as a whole.

The Core Strategy therefore set out the need for a detailed Supplementary Planning Document (SPD) to be prepared to deliver the necessary and desired wider development strategy.

Following the revocation of regional housing targets, Fylde’s Core Strategy has still not progressed and the precise shape and form of whatever proposals come forward as part of the Fylde Core Strategy remain uncertain. There is therefore no current commitment to wider development at the Hub and Fylde Borough Council, in considering its initial response to the revocation of regional housing targets on 5th August 2010 has approved that ongoing preparation of the Fylde Core Strategy should be based on developing “a housing need based solely on Fylde’s needs”.

Consistent with this, Fylde Borough Council’s public consultation response put forward the view that the Blackpool Core Strategy Preferred Option emphasis on a wider “*M55 Hub Growth Point*” including a conceptual illustrative plan of the wider

area, is inappropriate and potentially misleading. Irrespective of all the caveats, Fylde Borough Council's view is it appears to give a higher level of commitment to a wider level of development at the Hub than currently exists.

Recognising these concerns, it is considered that the revised Blackpool Core Strategy should more clearly re-focus its presentation of proposals within Blackpool. This represents no change in policy – which is already focused entirely on lands within Blackpool – but the re-titling of the section relating to the lands at Marton Moss within Blackpool (and how it is shown on the Key Diagram) should more accurately be shown as relating to '*South Blackpool*' rather than the *M55 Hub Growth Point*.

Public consultation responses from GONW, NWDA, and the Blackpool Fylde and Wyre EDC have also commented on the need to ensure effective integration with employment expansion and economic development needs.

Irrespective of what Fylde BC may determine in the future it remains the case that there is a commitment both in the Fylde Coast MAA and in the existing allocation of lands in the adopted Fylde Local Plan for further expansion and development at Whitehills Park, which provide a further key sub-regional site for some employment expansion.

Within Blackpool itself, however, the opportunity is also already recognised within the Core Strategy of the potential opportunity provided by lands in the South Blackpool/Airport strategic employment site (Policy S5) for regeneration and continuing expansion of the south Blackpool industrial estates close to the Airport. It is therefore considered that the basic strategic approach for some supporting edge of Blackpool development, it is therefore considered that the revised Blackpool Core Strategy should appropriately and more realistically relate to "*South Blackpool Sustainable Growth*" with a twin focus on employment lands as well as lands on Marton Moss within South Blackpool.

Lands at Marton Moss: Blackpool Core Strategy Preferred Option

The critical remaining issue raised substantially in the public consultation process, is the need to review the level of development proposed on the lands at Marton Moss within Blackpool.

The Executive resolved in February 2009 that development on Marton Moss should form part of the BCSP0. Subsequently the Council at its meeting in March 2009 in response to concerns over its future asked the Executive to prepare comprehensive research on the Moss which was reported to the meeting of the Executive of 15th July 2009 and included:

- A background paper prepared by the Council Planning Department setting out key development issues, demographic data and land use characteristics of Marton Moss.;
- The commissioning of Archaeo Environments to undertake a "characterisation" of the built and natural environment which looked at the historic development and the particular built and landscape characteristics of the Moss;

- The commissioning of Bowland Ecology to undertake a Phase 1 Habitats Survey identifying species or habitats of importance and the measures required to protect or enhance them.
- A 'Prospectus for Development' prepared by David Lock Associates, who had been commissioned by Blackpool and Fylde Councils to prepare a preferred concept master plan option for the wider M55 Hub lands (including Marton Moss) to inform the Core Strategy preparation of both Councils.

The final report by DLA drawing together the work undertaken on the Concept Masterplan has subsequently been completed and will be made available on the Council's website, but the potential for a more comprehensive way forward at the Hub remains dependent on decisions of Fylde Council. The report

On the basis of all the above findings extensive survey and analysis undertaken the recommended approach put forward in the Blackpool Core Strategy Preferred Option was subsequently confirmed. The lands allocated in the Core Strategy Preferred Option and the approach put forward in the plan as informed by the various studies is:

- Lands between Bennetts Lane and Progress Way to be included in the first phase of development to 2016. Planning permission has subsequently been granted for the development of 584 dwellings on this land in July 2010.
- Lands between Yeadon Way and Progress Way, east of Midgeland Road, to be included in Phase 2 post 2016,
- Land between Progress Way and School Road to only be developed beyond 2021 in accordance with the on-going review of the Core Strategy.
- Lands south of School Road to be included as an extension to the Green Belt in south Blackpool.

The scale of development proposed for 2,700 dwellings on the Moss met the outstanding requirement for development in the now revoked regional spatial strategy, and was also seen as a fundamental requirement to address the wider lack of quality new housing, attract higher income earning households, and provide sufficient choice for Blackpool resident population, particularly for family housing.

The approach towards development of the Moss in the Core Strategy sets out that development of sites post 2016 will only be permitted as part of a comprehensive wider strategy based on a full assessment of the future required scale, nature, phasing and impacts of development of the wider M55 Hub as a whole.

Core Strategy policy requires any new development to be provided as part of a sensitive and organic approach which draws on its heritage to create distinctive clusters of new housing appropriate to the existing character of the Moss, including:

- (i) Maintaining its horticultural character, and the provision of new allotment and community gardens.
- (ii) Strengthening the pattern of trees, and hedgerows
- (iii) Improving and extending the limited network of public footpaths.
- (iv) Providing sustainable drainage systems incorporating existing dykes

- (v) Retaining and supporting landscape and habitat diversity
- (vi) Retaining notable buildings of architectural or historical heritage.

The application of the above approach seeks to meet Blackpool's housing needs for development of these lands in a way which recognises the specific qualities of Marton Moss, keeping the man infrastructure of quiet lanes and retaining the overall field pattern to develop small housing clusters which will enhance the future environment of the Moss.

Lands at Marton Moss, Blackpool - The Way Forward

Marton Moss is the only major area of undeveloped land within the Blackpool local authority boundary. If Blackpool is to provide the new homes it needs and provide a re-balancing of its overall housing market, some development of lands on the Moss is a necessity. However, this is the only substantive safeguarded remaining area of open countryside in Blackpool. Its importance in its own right has been emphasised in many of the public consultation comments, and clearly presents difficult choices and ultimately decisions which need to be taken.

There is no consensus arising from the public consultation process, nor was it expected there could be. There is a range of diverse views and a clear conflict between those who support the benefits of development on the Moss, and those who fundamentally do not.

At one end of the scale there is support for the wider potential of lands on the Moss as part of a wider development at the Hub. Support through the public consultation process for a level of new development within Blackpool has come from a range of respondents including developers, residents and wider representative bodies and organisations.

At the other extreme – the main opposition to any substantial further development on the Moss has come from residents who live either on the Moss or nearby elsewhere in south Blackpool.

There is general understanding that whatever decisions are taken must be fully informed as part of a comprehensive wider strategy. It is also apparent there is strong recognition and support that any development of Marton Moss must seek to retain and embrace its own distinctive character.

While there is a substantial level of objection to further development on the Moss, there is also recognition of the need for development and change.

Whatever the balance of housing development pressures versus concerns to protect the environment of the Moss, it is crucial that any way forward is also based on a realistic view of where and what scale of development is appropriate on the Moss to be allocated and potentially built over the timescale of the plan to 2027.

The recent approval of proposed residential development on the lands between Bennetts Lane and Progress Way already provides major capacity for development on the Moss in the current housing market, and the need in the plan is to identify further sites and opportunities for development for 2016 -2027. In doing so the plan is

for the medium and longer term. While the current fragility of the housing market will not persist, a more cautious market for both buyers and lenders is the prospect.

In any normal terms based on past experience, a level of development take-up of around 50 dwellings per annum in Blackpool would be a rapid rate of development on any single site, and a take-up rate of 100 dwellings per annum is considered at the higher end of possible delivery that could be achieved across sites on Marton Moss within Blackpool.

With a mix of sites on the Moss providing around 100 dwellings per annum, there is no longer a need on this basis alone to allocate the scale of development that was proposed in the Core Strategy Preferred Option of 2,700 dwellings. This level of development post 2016 would only require the allocation of sufficient land for around 1,000 dwellings.

With less emphasis on housing dwelling numbers, the intimate and established existing character of the Moss would therefore favour a reduced development focus, with Progress Way potentially providing a definitive recognisable and already clearly defined southern urban edge to Blackpool.

The end of regional housing targets and parallel relaxation of housing density targets both also lend support to a more distinctive Moss approach, ensuring that a range of house types can be provided as part of a sensitive landscaped cluster of developments - and not at a cost of losing important landscape features of lanes, hedgerows, dykes and small fields patterns that make up the character of the Moss.

The lands between Yeadon and Progress Way still provide substantial and more realistic scope for development but would be a clear step back from any wider development of the M55 Hub to a lesser level of development more closely and readily integrated with the existing Blackpool urban area.

The principal re-focusing of the CS on south Blackpool, including the large remaining concentration of employment opportunities on the existing industrial estates and business parks within Blackpool on its southern boundary, also accords with an appropriate more integrated development focus - balancing the scale of residential development on the Moss with the main regeneration focus on the existing urban area, and similarly with a twin economic focus on south Blackpool and more central sites.

A substantial reduction in the proposed number of new homes on the Moss would thus better meet and align, Blackpool's own future need for homes and jobs, as well as enable a lower density landscaped format of development that would at least reduce if not address the concerns of those who most oppose any development on the Moss.

Conclusion The concerns of those that want no further development on the Moss will not be met, but it remains the case that some new development on the edge of Blackpool is fundamentally required to address the lack of wider quality new housing and provide better choice. A Moss approach to develop the areas of the Moss north of Progress Way will change its character to become part of the urban area rather than semi-rural, but the overall benefits of pursuing some sensitive and appropriate development on lands on the edge of Blackpool, rather than none, are considered to outweigh any disadvantages.

South of Progress Way

It is equally important to determine the appropriate future planning policy framework for the lands outside the main areas proposed for new development.

The Core Strategy Preferred Option for areas south of Progress Way encompassed two proposed policy approaches:

- Land between Progress Way and School Road proposed for residential development post 2021, subject to the on-going review of the Core Strategy.
- Land south of School Road was proposed as an extension to the South Blackpool Green Belt.

In line with the above assessment, there is no basis for lands between Progress Way and School Road any longer being required to make any substantive contribution towards meeting Blackpool's needs for new homes in the Core Strategy period to 2027.

The increasing development pressure on the lands north of School Road was seen in the Core Strategy Preferred Option as part of the justification for an extension to the Green Belt onto the lands to the south and up to the existing Borough boundary.

The response to public consultation draws attention to the need to ensure very careful consideration is given to the permanence of the proposed extension of the Green Belt – and that a detailed justification would be needed of the specific local circumstances to justify such an extension.

From the wider public response, it is apparent there is also some misunderstanding and misuse of the term 'Green Belt', which is often taken to mean just that land is kept open, green and safeguarded from major development – as against appreciating the full nature of the very restrictive policies and long term implications of a statutory allocation of the land specifically as "Green Belt".

While a small number of responses support development south of School Road, there was much wider support for the extension of the Green Belt. However, there was also a substantial level of opinion, particularly from those who made more specific and detailed public consultation responses (rather than give a yes/ no response to a questionnaire on this issue) in support of some more limited freedom for development to support the improvement and regeneration of parts of the Moss.

Given the essential permanence of Green Belt, the reduced development pressure on the lands, and a lack of convincing justification and strong public support it was the right way forward, it is recommended that an extension of the Green Belt in south Blackpool should no longer be pursued as a proposal of the Blackpool Core Strategy.

The alternative approaches for the lands south of Progress Way are:

- To continue the existing local Plan policy and longstanding allocation of the lands as countryside area
- To propose some change in the development status of the lands in line with some of the representations to the public consultation on the future of the Moss.

The longstanding policy allocation of the Moss as 'countryside area' with a very restrictive policy stance towards new development on the Moss was in essence based on:

- An absence of need for additional development land at that time
- The very specific character of the Moss and the need to avoid further intensification of development through infill development and conversions which are normally considered appropriate in other countryside areas.
- Awareness that the time would eventually come when a balanced judgement needs to be made about the long term need for development to protect some or all of the Moss.

The Council and successive Inspectors at Local Plan Inquiries have consistently taken the view that a gradual piecemeal erosion of the open and rural character of the Moss would have undermined the potential for and been worse than a comprehensive planned development that might eventually come forward at some time in the future.

With the need for potential development opportunities elsewhere, it is now essential the Council carefully considers the alternatives and seeks to determine the best long term future for the Moss as a whole.

The area is very different in character to more typical countryside areas. In many ways it is urban fringe land rather than a rural area, with plots on many of the main road frontages comprising existing residential properties and a mix of other uses. To the rear the land comprises a mix of many small plots of land which provide large garden curtilages, or small paddocks as well as remaining greenhouses. However, parts of the Moss also comprise untidy, under former horticultural land which in a number of instances are in a poor state of repair and exhibit few of the essential characteristics of more open countryside.

Thus lands whose lanes, hedgerows, remaining market gardens use and grazing land are valued by many as the character and historic environment of Marton Moss, are also seen by others as already very much undermined by the creep of urbanisation, busy encroaching roads, degradation, and traffic noise.

The crucial issue (together with the opportunities for more substantial development north of Progress Way), is therefore not whether to safeguard the lands south of Progress Way for itself, as it is today, but to determine whether:

- it should be safeguarded by a continuing long term restrictive policy approach which will enable the Council to again review its status at some time in the future

or

- there is now the need to safeguard but also improve the remainder of the Moss and remove eyesores, enhance its appearance, rather than leave or neglect the area until it is reconsidered at some time in the future.

The Core Strategy proposals for the development of lands north of Progress Way together will potentially encompass more than half the Moss, along with the original “80 acre” development brought forward in the 1980s around Highfield Road, and the recently approved development between Bennetts Lane and Progress Way.

Balancing the need for development against the recognised benefits of the Moss, it is clear that where substantial development takes place, the character of the Moss will become suburban rather than rural. Inappropriate development of too much of the Moss would effectively not only lose its remaining character, but potentially be counter productive in that it would to a substantial extent simply displace its pattern of uses to other existing lands outside the urban area, creating a new urban fringe elsewhere.

On balance it is considered that now is also the time to pursue a future for the remaining lands south of Progress Way as part of the re-appraisal of a positive way forward for Marton Moss as a whole.

Conclusion On balance in conjunction with the proposals for the lands north of Progress Way, the need is to pursue an approach to enhance and improve the appearance and support the long term future of the remaining lands south of Progress Way as part of a positive way forward for “Marton Moss” as a whole.

Recommendations are made:

- *To safeguard the predominantly more open green and distinctive character of the lands south of Progress Way*
- *To maintain a restrictive policy towards the construction of new buildings*
- *To relax the policy towards extensions and replacement of existing dwellings and the conversion of existing appropriate buildings which are consistent with its open and remaining rural character*
- *To maintain open aspects across the Moss, remove eyesores, and pursue proposals for landscape and built enhancement which improve the interest and value of the Moss*

Any such approach would need to be prepared and defined in more detail in the proposed Supplementary Planning Document (SPD) for the future implementation of a sensitive and distinctive approach to new development across the Moss as a whole, clearly distinguishing between the essential future emphasis on the development of a sustainable urban extension on lands to the north of Progress Way, as against continuing strict controls on future development south of Progress Way,

Conclusion Overall Summary Reassessment of Policy S3

It is recommended that the proposed changes to the Blackpool Core Strategy for the provision of new homes set out in this report are amended to reflect the following changes to meet requirements to 2027 from the four sources below as follows:

<i>Central Blackpool Inner Area Regeneration sites</i>	<i>2,000 dwellings</i>
<i>Other urban area SHLAA sites</i>	<i>1,500 dwellings</i>
<i>Windfall allowance for conversions</i>	<i>1,000 dwellings</i>
<i>- Strategic development site at Marton Moss (including site with existing planning permission)</i>	<i>1,500 dwellings</i>