



Blackpool Council

## Core Strategy

### Sustainability Appraisal and Strategic Environmental Assessment

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SA Report Addendum – Proposed Main Modifications



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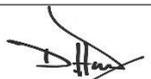


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### Core Strategy

# Sustainability Appraisal and Strategic Environmental Assessment

## SA Report Addendum – Proposed Main Modifications

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# CONTENTS

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1	INTRODUCTION .....	1
1.1	Background and Purpose of this Report.....	1
2	PROPOSED MODIFICATIONS TO THE UDP AND THEIR SUSTAINABILITY IMPACTS .....	1



# 1 INTRODUCTION

## 1.1 Background and Purpose of this Report

Blackpool Council has been developing its new Local Plan since 2008. Once adopted it will replace the existing Blackpool Local Plan adopted in June 2006.

During this period of development the emerging Local Plan has been subject to Sustainability Appraisal (SA) at a number of stages. In June 2014 an SA Report was produced to accompany the Proposed Submission Local Plan. This addendum report should be read in conjunction with that SA Report which provides full details of the SA process and findings up to that point.

Starting on May 11<sup>th</sup> 2015, The Blackpool Local Plan Part 1: Core Strategy, underwent an Examination in Public for four days. In response to the Inspector's request the Council has put forward a number of **Main Modifications** required to make the Core Strategy 'sound'.

This addendum report therefore presents the SA commentary alongside each of those proposed Main Modifications and determines if the findings of the published SA Report would be affected by these modifications.

## 2 PROPOSED MODIFICATIONS TO THE UDP AND THEIR SUSTAINABILITY IMPACTS

The proposed Main Modifications to the Local Plan are presented in Table 2-1 which also identifies the reasons for each proposed Main Modification and outlines whether or not it affects the assessment presented in the SA Report.

Table 2-1: SCHEDULE OF PROPOSED MAIN MODIFICATIONS

~~Strikethrough~~ - deleted text

**Bold Underline** – New or amended text

Modification Number	Page No.	Policy / Paragraph	Proposed Main Modification	Reason for Modification	SA Comment
MainMod01	35	CS2	Provision will be made for the delivery of <del>around</del> 4,200 new homes in Blackpool between 2012 and 2027.	For clarity and in response to Proposed Submission representations from Wyre Council and the Home Builders Federation and further discussion at the Hearing Sessions.	This is a minor modification which would not alter the assessment of the policy. Given the high-level nature of the SA it would not pick up significant differences between within 200 homes or so across the entire borough. <b>No further assessment required.</b>
MainMod02	36	5.11	<del>Identified sites within the existing urban area, including major regeneration sites, are expected to provide around 1,950 new homes in total (net). These are identified in the Strategic Housing Land Availability Assessment (SHLAA) and comprise sites committed for development; vacant, underused or derelict land considered suitable for housing; and major regeneration sites within the inner areas, priority neighbourhoods and resort core, including the seafront.</del>  Replace with:  <b><u>Identified sites within the existing urban area, including major regeneration sites, will be allocated in the Site Allocations and Development Management Policies document. These sites are likely to include some or all of those identified in the Strategic Housing Land Availability Assessment (SHLAA) which comprises sites</u></b>	Responding to discussion with the Inspector and HBF at the Hearing Sessions.	The principle of developing sites in the inner urban areas has been assessed in the SA. It has always been assumed that further detail and assessment would be undertaken at the next stage of plan-making. The minor modification to the text would not change the assessment. <b>No further assessment required.</b>

Modification Number	Page No.	Policy / Paragraph	Proposed Main Modification	Reason for Modification	SA Comment
			<b><u>committed for development; vacant underused or derelict land considered potentially suitable for housing; and major regeneration sites within the inner areas, priority neighbourhoods and resort core including seafront.</u></b>		
MainMod03	37	5.13	<p>In recognition of Blackpool's difficult housing market and the risks in delivering more challenging sites, the SHLAA will identify a reasonable buffer of sites (around 30% although this will be kept under review) beyond what is required over the plan period, to provide flexibility should some sites not come forward as anticipated, despite using the best information available.</p> <p>Replace with:</p> <p><b><u>The SHLAA identifies as potentially suitable for housing sites for around 30% more dwellings than are needed to meet the housing target of 4200 between 2012 and 2027. In recognition of Blackpool's difficult housing market and the risks in delivering more challenging sites the Site Allocations and Development Management Policies document is likely to include a buffer of allocated sites over and above the minimum requirement. The scale of the buffer of sites within the Site Allocations and Development Management document will be kept under review and will be informed by housing delivery monitoring work.</u></b></p>	Responding to discussion with the Inspector and HBF at the Hearing Sessions.	The minor modification to the text would not change the assessment. It simply provides further clarity to the text. <b>No further assessment required.</b>
MainMod04	38	CS2 supporting text	<p>New paragraph after 5.22:</p> <p><b><u>Meeting the housing needs of the Fylde Coast Sub-Region</u></b></p> <p><b><u>The SHMA identifies an Objectively Assessed Need for</u></b></p>	Responding to discussion with the HBF at the Hearing Sessions.	The addition of this paragraph would not affect any scores in the SA against this policy. It provides further clarity over working with neighbouring

Modification Number	Page No.	Policy / Paragraph	Proposed Main Modification	Reason for Modification	SA Comment
			<u>each of the Fylde Coast authorities within the housing market area. The Council will continue to work with the neighbouring authorities of Fylde and Wyre through the Duty To Co-operate to ensure the overall housing needs of the housing market area are met in full.</u>		authorities. <b>No further assessment required.</b>
MainMod05	38	CS2 supporting text	New paragraph after 5.22: <b><u>Consideration of planning applications for new dwellings prior to the adoption of the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies</u></b>  <b><u>The Council is very keen to ensure that the housing target of 4200 is delivered over the plan period and that an average of at least 250 new homes is completed in the years 2012 – 2017. Prior to the adoption of the Site Allocations and Development Management Policies document planning applications for new homes will be assessed against relevant policies in this plan, saved policies of the Blackpool Local Plan 2006 and the NPPF.</u></b>	Responding to discussion with the HBF at the Hearing Sessions.	The modification to the text would not change the SA. It simply adds clarity to the policy framework new housing applications which come forward will be assessed against before the adoption of the site allocations document. This was already assumed in the existing SA. <b>No further assessment required.</b>
MainMod06	41	5.35	5.35 In order to facilitate regeneration, redevelopment opportunities which introduce a suitable mixed-use development, including housing, will be considered <del>in exceptional circumstances on a small minority of sites where this would</del> <b>where it is exceptionally and robustly justified as necessary to</b> secure the future business/industrial use of the site. Any <b>such</b> enabling development <del>would need to be robustly justified and should</del> not conflict with wider plan objectives.	To ensure the policy appropriately aligns with NPPF paragraph 22 and 51.	Minor changes to the wording would not alter the SA – it strengthens the existing wording and provides clarity. <b>No further assessment required</b>
MainMod07	44	CS4 (3)	3. In edge of centre and out of centre locations, proposals for new retail development and other town	Responding to discussion with the Pleasure Beach at the Hearing	The modification to the policy would not change the SA

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			<p>centre uses will only be permitted where it can be demonstrated that:</p> <p><b><u>a. It is a tourism attraction located in the Resort Core in accordance with policy CS21; or</u></b></p> <p><b><u>b.</u></b> There are no more centrally located/ sequentially preferable, appropriate sites available for the development; <b><u>and</u></b></p> <p><b><u>c.</u></b> The proposal would not cause significant adverse impact on existing centres; <b><u>and</u></b></p> <p><b><u>d.</u></b> The proposal would not undermine the Council's strategies and proposals for regenerating its centres; <b><u>and</u></b></p> <p><b><u>e.</u></b> The proposal will be readily accessible by public transport and other sustainable transport modes.</p>	Sessions.	<p>assessment. It would, however, further strengthen the policy, particularly the positive score against SA Objective 8 'To promote sustainable tourism' – albeit not to a major positive score.</p> <p><b>No further assessment required.</b></p>
MainMod08	49	CS5 (5)	5. Addressing <del>town centre</del> parking capacity issues by providing sufficient, high quality and conveniently located car parks, to support the town centre and resort economy and address wider issues of parking provision across the Borough.	Responding to discussion with the Pleasure Beach at the Hearing Sessions.	<p>This is a minor modification which would not alter the SA as the policy still includes parking in town centre locations as well as other areas.</p> <p><b>No further assessment required.</b></p>
MainMod09	61	CS8	<p><b>Policy CS8: Heritage</b></p> <p>1. Development proposals will be supported which respect and draw inspiration from Blackpool's built, social and cultural heritage, complementing its rich history with new development to widen its appeal to residents and visitors.</p>	Request made by the Inspector to ensure wording reflects NPPF.	<p>The wording of the policy now reflects those in the NPPF and provides an update to the heritage baseline in Blackpool including greater clarity of wording although the principles of the original policy remain. These minor modifications do not</p>

Modification Number	Page No.	Policy / Paragraph	Proposed Main Modification	Reason for Modification	SA Comment
			<p>2. Proposals will be supported that:</p> <p>a. Appraise and improve the condition and safeguard the heritage of key buildings, attractions and infrastructure</p> <p>b. Retain, reuse or convert key heritage buildings</p> <p><b><u>a. Retain, reuse or convert, whilst conserving and enhancing, designated and non-designated heritage assets in a way that recognises their significance</u></b></p> <p><b><u>b.</u></b> Enhance the setting and views of heritage buildings <b><u>assets</u></b> through appropriate <b><u>design and</u></b> layout of new development and design of public realm</p> <p><b><u>c.</u></b> Strengthen the existing <b><u>townscape</u></b> character created by historic buildings</p> <p>3. Developers must demonstrate how the <b><u>any</u></b> development <b><u>affecting heritage assets (including conservation areas)</u></b> will complement <b><u>conserve</u></b> and enhance <b><u>the asset, its significance and its setting.</u></b> existing features of heritage significance including their wider setting, particularly for those developments affecting conservation areas, listed buildings and other identified heritage assets.</p> <p>4. The Council will seek to safeguard heritage assets from inappropriate development.</p> <p>5. The Council has identified and adopted a local list of heritage assets.</p> <p>5.121 Blackpool, as the world's first seaside resort for the</p>		<p>alter the SA.  <b>No further assessment required.</b></p>

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			<p>masses, has a rich and well recognised social and built heritage with the town’s past success founded on iconic and innovative Victorian landmarks. Blackpool’s heritage assets include the Tower, Winter Gardens, Piers, Grand Theatre, Illuminations and Tramway. At present, there are <del>38</del> <b>40</b> listed buildings (<b>designated heritage assets<sup>1</sup></b>), <del>two</del> <b>four</b> conservation areas, a grade 2* listed Historic Park (Stanley Park) and numerous locally listed buildings (<b>non-designated heritage assets<sup>1</sup></b>).</p> <p>5.122 The Illuminations are unique and differentiate Blackpool from other UK seaside resorts. New innovative projects are being implemented to strengthen, update and capitalise on this offer, bringing contemporary and traditional light shows synonymous with Blackpool into the town centre and on the new promenade headlands.</p> <p>5.123 The upgrade of the Victorian Tramway provides a fast and modern commuter route to better serve the residents as well as visitors. Alongside provision of modern new vehicles and supporting infrastructure, the historic appeal of vintage trams has been consolidated and enhanced as part of the visitor experience.</p> <p>5.124 The Council will support appropriate remodelling of <del>existing</del> heritage assets to secure their long term future and provide new reasons to visit. In 2010, Blackpool Council purchased the Tower and Winter Gardens to facilitate their improvement and help secure their long term future. Heritage led improvement</p>		

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			<p>schemes have been implemented for both of these attractions. The Winter Gardens has been sensitively restored and has the potential to widen its range of uses in the future (see also policy CS18: Winter Gardens). Blackpool Tower has been significantly improved and working in partnership with Merlin Entertainments is now home to the Blackpool Dungeon, Blackpool Tower Eye and Circus.</p> <p>5.125 Any new development will be required to protect and enhance the character, quality and setting of conservation areas and <del>notable buildings of heritage value</del> <b>heritage assets</b>. It is vital that these heritage assets are protected and enhanced to complement and strengthen the existing <b>townscape</b> character created by historic buildings.</p> <p>5.126 Features of buildings that make a contribution to historic character but are not specifically identified also have value and should be respected in new development.</p> <p><del>5.127 The importance of Blackpool's heritage is little understood outside key structures like the Tower, Winter Gardens and Grand Theatre. There is a need to critically appraise the current condition of key buildings, and safeguard and reinforce their heritage value.</del></p> <p>5.128 Detailed information has been gained from characterisation studies recently undertaken for various parts of the town. These studies <del>will inform</del> <b>have informed</b> future decisions to safeguard and protect local buildings of historic significance, <del>with the Council having prepared a Local List of heritage assets.</del> <b>The Council has recently adopted a Local List of heritage assets,</b></p>		

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			<p><b><u>reflecting the commitment to protect locally important heritage assets and has commenced preparation of a Built Heritage Strategy for the future conservation and enhancement of the town's historic environment in support of this policy.</u></b></p> <p>5.1298 It is vital that Blackpool provides the quality desired by the modern visitor whilst cherishing and promoting the heritage assets, which have helped bring about the resort's past success and provide a strong base for the town to reinvent itself to attract a new generation of families and visitors.</p> <p><sup>1</sup> <b><u>As defined in NPPF (Annex 2: Glossary)</u></b></p>		
MainMod10	63	CS9	<p><del>d. Ensure that there is no increase in the rate of surface water run-off from the site as a result of development;</del></p> <p><b><u>e. d. Where appropriate, not discharge surface water into the existing combined sewer network. If unavoidable, development must</u></b> Reduce the volume and rate of surface water run-off discharging from the site in to the combined sewer system by as much as is reasonably practicable;</p>	Responding to the Proposed Submission representation from United Utilities.	The revisions have the same effect in principle but are more specific in terms of utilities infrastructure. These minor changes to the wording of the policy would not alter the SA. <b>No further assessment required.</b>
MainMod11	65	5.142	<p>Landowners and developers should investigate every option before discharging surface water into the sewerage network, however where necessary surface water should discharge in the following order of priority:</p> <ul style="list-style-type: none"> <li>■ A soakaway or some form of infiltration system (using sustainable urban drainage principles); or</li> </ul>	Responding to the Proposed Submission representation from United Utilities.	The additional text regarding maintaining or improving greenfield run-off rates for new development in those locations is positive but would not be sufficient to affect the existing SA scores.

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			<ul style="list-style-type: none"> <li>■ An attenuated discharge to the watercourse (a discharge to groundwater or watercourse may require consent of the Environment Agency); or</li> <li>■ As a last resort, an attenuated discharge to the combined sewer system.</li> </ul> <p><b><u>On greenfield sites, applicants will be expected to demonstrate that the current natural discharge solution from a site is at least mimicked. On previously developed land, applicants should target a reduction of surface water discharge. Surface water should be managed at source and not transferred. Every option should be investigated before discharging surface water into a public sewer. A discharge to groundwater or watercourse may require the consent of the Environment Agency.</u></b></p>		<b>No further assessment required.</b>
MainMod12	66	CS10 and supporting text	<p><b>Sustainable Design and Renewable and Low Carbon Energy</b></p> <p>5.146 The Climate Change Act (2008) introduced legally binding targets to reduce UK carbon emissions by at least 80% by 2050 compared to 1990 levels. In order to help meet this target local authorities are required to reduce carbon emissions. These reductions are ambitious and building the infrastructure to deliver them will require taking an early lead to achieve the target in a cost effective way. Sustainable design and construction and the use of renewable and low carbon energy are key to achieving a reduction in carbon emissions.</p> <p>5.147 To mitigate the impacts of climate change,</p>	To reflect up to date government policy/guidance and respond to HBF.	Changes to CS10 and its supporting text are considered to be minor and simply reflect the current guidance. In particular, further detail is provided regarding wind energy developments and the need to consider these further at the next stage of plan-making. These changes are positive but were also assumed in the original SA, therefore, the changes would not significantly affect the assessment of CS10 or its scoring.

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			<p>renewable and low carbon energy will play an increasingly important role in the supply of energy. Furthermore, the generation of renewable and low carbon energy will reduce the effects of rising energy prices and reliance on imported and finite (non-renewable) fossil fuels, improve community health and well-being, create more desirable homes and places to live, and stimulate investment in new jobs and businesses.</p> <p><b><u>The Government’s Ministerial Statement dated 25th March 2015 announced the approach to energy performance requirements for new dwellings. This matter will be dealt with through the Building Regulations process.</u></b></p> <p><b>CS10: Sustainable Design and Renewable and Low Carbon Energy</b></p> <p>1. To mitigate the impacts of climate change, minimise carbon emissions and ensure buildings are energy efficient, <b>non-residential</b> developments must follow the principle of the energy hierarchy, which is to:</p> <p>a. Reduce the need for energy by taking all reasonable steps to locate and orientate buildings to incorporate passive environmental design for heating, cooling, ventilation, and natural day-lighting. <del>Buildings should be flexible enough to adapt to the effects of climate change over their lifetime;</del></p> <p>b. Minimise energy use by ensuring appropriate energy</p>		<p><b>No further assessment required.</b></p>

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			<p>efficient measures are integral to development proposals; and</p> <p><del>c. Meet residual energy requirements, where feasible and viable, through the use of renewable and low carbon energy generating technologies. In doing so, development should: i. Include renewable and low carbon energy provision, appropriate to the development and its surroundings ii. Investigate opportunities to incorporate or connect to decentralised renewable and low carbon energy networks.</del></p> <p><b><u>c. Investigate opportunities to include renewable and low carbon energy provision</u></b></p> <p><del>2. An Energy Strategy, including details on the phasing and location of energy centres and networks, will be required for all Strategic Sites.</del></p> <p><b><u>2.</u></b> The development of renewable, low carbon, or decentralised energy schemes, <u>excluding wind turbines particularly community led schemes</u>, will be supported where proposals:</p> <p>a. Are located appropriately and do not cause an unacceptable impact on surrounding uses or the local environment, landscape character or visual appearance of the area, taking into account the cumulative impact of other energy generation schemes; and</p> <p>b. Mitigate any potential noise, odour, traffic or other impacts of the development so as not to cause an unacceptable impact on the environment or local</p>		

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			<p>amenity.</p> <p><b><u>3. For development involving one or more wind turbine, planning permission will only be granted where:</u></b></p> <p><b><u>a. the development site is in an area identified as suitable for wind energy development in the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies DPD and;</u></b></p> <p><b><u>b. following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.</u></b></p> <p><b>4.</b> All new non-residential development over 1,000m2 will be required to achieve BREEAM ‘very good’ (or any future national equivalent).</p> <p>5.148 The sustainable design and construction of buildings is fundamental to achieving a reduction in carbon emissions, improving the environmental performance of buildings and increasing the resilience of communities by ensuring new developments are capable of adapting to the effects of climate change over their lifetime. To achieve this, Policy CS10 requires all <b><u>non-residential</u></b> developments to follow the principle of the energy hierarchy. That is, to improve the efficiency of a building and reduce the need for energy through design, <del>prior to meeting residual energy requirements through the installation of renewable and low carbon energy</del></p>		

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			<p>generation technology.</p> <p>5.149 Reducing the energy requirements of new development can be achieved through all stages of design, from the site layout and the orientation of buildings to the efficient design of the buildings themselves. Careful design of a building and the design and specification of built elements can balance heat loss and overheating in new buildings. Mitigation measures such as building orientation, external shutters, the correct shading of windows on south and west elevations, using passive stack or cross ventilation, green-roofs for thermal mass and the choice of materials and design of outer walls can all assist in reducing the need and use of energy.</p> <p>5.150 In addition to new development, opportunities to reduce energy use and carbon emissions in existing buildings and measures to improve the energy efficiency of such properties will be supported.</p> <p>5.151 The Borough’s location and dense urban form provides three main opportunities to contribute to the national reduction in carbon emission and increased supply of renewable and low carbon energy, which are:</p> <ul style="list-style-type: none"> <li>■ Improving the performance of existing buildings, through energy efficiency measures and inclusion of on-site low carbon and renewable energy technologies;</li> <li>■ Delivering energy efficient buildings as part of new development along with on-site low carbon and renewable energy technologies; and</li> </ul>		

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			<p>■ Wider community intervention for the development of renewable and low carbon energy systems on a strategic scale, such as the setting up of community-led district energy systems.</p> <p><del>5.152 A Supplementary Planning Document on energy efficiency will be prepared by the Council providing more guidance on the measures that should be considered and, where appropriate, provided to reduce energy use.</del></p> <p>5.153 The UK's energy supply currently relies heavily on fossil fuels such as coal, oil and gas which are finite resources and have a detrimental impact on the climate by releasing greenhouse gases. Renewable energy technology is powered by naturally occurring and naturally replenished energy and does not produce greenhouse gas emissions. Examples include the movement of wind and water (wind turbines and hydropower), energy from sunlight (solar power), and fuel from organic material such as plants and waste (biomass). Low carbon technologies generate electricity but emit significantly less carbon dioxide than traditional fossil-fuelled power generation. Examples include heat pumps, district heating and combined heat and power (CHP) systems.</p> <p>5.154 Reducing reliance on fossil fuels and increasing the supply of renewable and low carbon energy will ensure the UK has a secure and sustainable energy supply and will reduce greenhouse gas emissions to slow down climate change.</p> <p>5.155 The generation of renewable and low carbon energy combined with the incorporation of energy</p>		

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			<p>efficient measures as part of new developments is particularly important in Blackpool, which has the highest proportion of households in fuel poverty out of the 326 authorities across England (2013)<sup>23</sup>. It is therefore crucial that all developments incorporate 23 DECC (2013) Fuel Poverty Report measures that will address the significant levels of fuel poverty experienced in Blackpool to improve the health and wellbeing of communities and to meet the national requirements to reduce carbon emissions and increase the supply of renewable energy.</p> <p>5.156 Opportunities for renewable and low carbon energy generation and carbon reductions in the town are identified in the Blackpool Climate Change and Renewable Energy Study (2010) and as part of a Lancashire wide study (Renewable Energy Target Setting and Policy Development). These studies identify strategies and currently available technologies that would enable Blackpool to fulfil its potential for renewable and low carbon energy generation, with the town being able to provide around 29MW energy by 2030. <b><u>For the case of wind turbine development, as outlined in the Ministerial Statement dated 18<sup>th</sup> June 2015, planning permission will only be granted where the development site is in an area identified as suitable for wind energy development and following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing. Where areas are deemed to be suitable for wind energy development they will be set out in the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies DPD which will be informed by the Council's Climate Change and</u></b></p>		

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			<p><b><u>Renewable Energy Study (2010) and any further evidence base work undertaken.</u></b></p> <p>5.157 The Energy Opportunities Map set out in the Blackpool Climate Change and Renewable Energy Study identifies significant potential to implement district heating across large areas of Blackpool due to the dense urban form of the Borough. At present district heating systems can be made viable on a range of scales with most in the UK (85%) being classed as small scale, averaging 35 dwellings per network<sup>24</sup>. Therefore, where viable and feasible, developers should explore how district heating systems can be made to work on their site, considering community funding or the use of a local Energy Service Company to overcome the initial capital cost and realise longer term profits and other benefits.</p> <p>5.158 Mixed-use developments often present the best opportunities for district heating and CHP as they can provide a more balanced heat and energy use profile enabling significant reductions in carbon emissions. Beyond reducing emissions, community energy systems also generate income from Feed-in-Tariffs, Renewable Heat Incentives as well as the sale of heat and/or power to households to generate an income. <del>Many renewable energy and low carbon energy schemes are difficult to deliver on a conventional basis as the 24 DECC (2013) Summary Evidence on District Heating Networks in the UK returns, though considerable, are generated over a long period. For investors with a long term interest (which may include community groups or local authorities) this can be very attractive and the Council will support such measures.</del></p>		

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			<p>5.159 Blackpool's dense urban form and high proportion of older buildings which are not energy efficient presents an opportunity for the retro-fit of district heating networks, forming an extension to a newly installed district heating system. These can provide large areas of the town with highly efficient heating and hot water. Whilst they involve significant infrastructure investment, high up-front costs can be turned into profits over the long-term and savings to those who are connected. The Council will support retro-fitting measures where appropriate, as funding and opportunities arise. On a smaller scale, the installation of solar panels and heat-pumps on buildings will also be supported where appropriate.</p> <p><del>5.160 Due to their scale, strategic development sites provide good opportunities to install energy efficient power sources such as district heating and CHP systems. An energy strategy showing where energy centres and networks will be located and how they will be phased will enable the developer to demonstrate that every effort has been made to consider energy efficiency and renewable and low carbon energy measures made viable by the scale of development. This energy strategy will guide the development of low carbon infrastructure in a co-ordinated way and ensure that individual developments on the site can be taken forward in a carbon and cost efficient manner. As these sites are likely to be developed in phases, it is important that early phases do not prejudice the potential to install energy efficiency measures in those that follow.</del></p>		
MainMod13	73	CS12	e. Reflects the built heritage of the neighbourhoods and enhances the <del>appearance</del> <b>setting</b> of important existing	For clarity and in response to a representation from English	Minor modification to the wording of the Policy would not

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			buildings and their settings.	Heritage.	affect the SA scores. <b>No further assessment required.</b>
MainMod14	78	CS13(1)	1. Including a mix of house types and sizes, having regard to the specific character, <del>and</del> location <b>and viability</b> of the site. The <del>general</del> <b>normal</b> requirement is as follows:	Responding to discussion with the Inspector at the Hearing Session.	Minor modification to the wording of the Policy would not affect the SA scores. <b>No further assessment required.</b>
MainMod15	78	CS13(2)	2. Providing quality living accommodation, which meets the <b>relevant</b> standards in place for conversions or new build development.	To reflect up to date government policy/guidance	Very minor modification to the wording of the policy would not affect the SA scores. <b>No further assessment required.</b>
MainMod16	79	6.24 and 6.25	<p><b>Housing Standards</b></p> <p>6.24 In order to provide a choice of quality homes across the Borough and complement wider housing intervention programmes to improve the quality of Blackpool's existing housing stock, it is essential that all new housing being delivered will provide quality accommodation where people would choose to live. To ensure a consistent approach in achieving quality, new housing will be required to meet the <del>local</del> <b>relevant</b> standards <del>produced</del> for conversions and new build developments. <del>These will be based on relevant national standards and guidance where appropriate, including the Code for Sustainable Homes, Building for Life and Lifetime Homes standards; with the latter being particularly important to provide accessible homes to meet the future needs of Blackpool's older person households as evidenced in the SHMA.</del></p> <p>6.25 Current <b><u>New residential development will be required to meet the Government's Technical Housing Standards – nationally described space standard.</u></b> <b><u>Additional</u></b> guidance on the conversion or subdivision of</p>	To reflect up to date government policy/guidance and respond to HBF.	Minor modifications to the text provides a more up-to-date reflection of current best practice although the principles remain the same. The modifications would not affect the SA. <b>No further assessment required.</b>

Modification Number	Page No.	Policy / Paragraph	Proposed Main Modification	Reason for Modification	SA Comment
			properties for residential use is contained within the 'New Homes from Old Places Residential Conversion and Sub-Division SPD'. Costs associated with achieving these standards have been incorporated into relevant viability testing appraisals. <del>The intention is to produce a sustainable design SPD for new build developments, with the scope of this needing to reflect the outcome of the Government's latest consultation on local housing standards.</del>		
MainMod17	80	CS14 (1)	1. All market and specialist housing developments, including conversions, creating a net increase of <del>3</del> <b>11</b> dwellings or more will be required to provide affordable housing (either on-site or off-site) or make a financial contribution towards affordable housing provision. Developments within the defined inner area <b>(as identified on the Local Plan Policies Map)</b> are exempt from this requirement.	For clarity and to reflect the changes to NPPG in November 2014 in relation to tariff style contributions.	Minor modification to the wording of the policy would not affect the SA scores recorded. The modification simply reflects the most up to date information provided in the NPPG and makes more specific reference to the policies map for clarity. <b>No further assessment required.</b>
MainMod18	80	CS14 (2)	a. Where developments would comprise 15 dwellings or more, or on sites of 0.5 hectares or more, the <del>minimum</del> requirement is 30% of the total number of dwellings created. On-site provision will be sought where possible. Off-site provision, or a financial contribution of broadly equivalent value, will be considered instead of on-site provision where the site is unsuitable for affordable housing, or where this would be more effective in delivering affordable housing to support Blackpool's regeneration objectives;	To reflect the changes to NPPG in November 2014 in relation to tariff style contributions.	This minor modification to the wording of the policy would not affect the SA scores as the principle of ~30% has already been assessed. <b>No further assessment required.</b>

Modification Number	Page No.	Policy / Paragraph	Proposed Main Modification	Reason for Modification	SA Comment
MainMod19	80	CS14 (2)	b. Where developments are on sites less than 0.5 hectares and would comprise $\geq$ 11-14 dwellings, then a financial contribution towards off-site provision will be sought. This contribution level will be set out in the Affordable Housing Supplementary Planning Document (SPD), in accordance with the most recent viability assessment and the latest government guidance;	To reflect the changes to NPPG in November 2014 in relation to tariff style contributions.	The modification simply reflects the NPPG and increases the amount of housing needed to require offsite provision. This is considered to still meet latest guidance and hence needs. It may also encourage more developers to come forward. Minor modification to the wording of the policy would not affect the SA scores recorded. <b>No further assessment required.</b>
MainMod20	81	Para 6.30	Affordable housing need for Blackpool and its housing market area is evidenced in the Fylde Coast Strategic Housing Market Assessment (SHMA). The most recent SHMA was published in March 2014 and contains housing need analysis from 2013. <b><u>A further addendum to the SHMA was published in November 2014.</u></b> This calculates that the likely level of affordable housing required over the next 5 years is <del>264</del> <b>272</b> new homes per year in Blackpool, within the inner areas and elsewhere, based on the number of current and newly forming households in need (and subtracting the available/committed supply)	The figure now reflects the updated figure set out in the SHMA Addendum November 2014.	This minor modification would not affect the SA scores recorded. The change simply reflects most up to date information and only a minor change in housing requirements. <b>No further assessment required.</b>
MainMod21	81	Para 6.34	In Blackpool, a large proportion of new housing is expected to come forward from developments below the 15 dwellings threshold. These schemes are able to make an important contribution towards affordable housing provision and supporting	To reflect the changes to NPPG in November 2014 in relation to tariff style contributions.	The modification simply reflects the NPPG and increases the amount of housing needed to require offsite provision. This is considered to still meet latest

Modification Number	Page No.	Policy / Paragraph	Proposed Main Modification	Reason for Modification	SA Comment
			evidence shows the requirements would not render them unviable. Specifically, developments comprising <del>3</del> <b>11</b> -14 (net) dwellings, including conversions, will be required to make a financial contribution towards off-site affordable housing provision. The contribution required will be informed by, and be compatible with, the most recent viability assessment undertaken by the Council and the latest government guidance. The specific contribution level will be set out in the Affordable Housing SPD, in order to provide sufficient flexibility to take account of Blackpool's challenging market conditions and viability issues, the need to reflect a decision on whether or not to introduce CIL, and the possibility of emerging government guidance introducing minimum thresholds for affordable housing contributions.		guidance and hence needs. It may also encourage more developers to come forward. Minor modification to the wording of the text would not affect the SA scores recorded. <b>No further assessment required.</b>
MainMod22	82	6.35	Developments creating less than <del>3</del> <b>11</b> net units are exempt from making an affordable housing contribution, as are sites within the defined inner area <b>(as identified on the Local Plan Policies Map)</b> , including sites along the promenade which fall within the inner areas. Ensuring these schemes are viable will encourage conversions from modest guest houses into high quality homes to come forward, as well as regeneration schemes within the inner areas and along the seafront, which are an important element of future supply. This supports the Council's housing strategy and is also informed by the recent Viability Study (URS, 2014).	To reflect the changes to NPPG in November 2014 in relation to tariff style contributions.	Minor modification to the wording of the text would not affect the SA scores recorded as with the above modification. The modification simply reflects the NPPG. <b>No further assessment required.</b>

Modification Number	Page No.	Policy / Paragraph	Proposed Main Modification	Reason for Modification	SA Comment
MainMod23	90	CS17	c. <del>Exploiting</del> <b>Conserving and enhancing</b> key heritage and entertainment assets within the town centre and complementing these with new innovative development	For clarity and in response to Proposed Submission representations from English Heritage/Historic England and the Theatres Trust.	The revised choice of wording makes more sense but in principle is the same as was assumed in the original assessment. This would not alter the assessment of the policy. <b>No further assessment required.</b>
MainMod24	94	CS18	2. Proposals must be presented in the context of a comprehensive approach, <del>respect the character and</del> <b>sustain and enhance the</b> heritage of the Grade 2* Listed Building and conform to the Winter Gardens Conservation Statement <b>Conservation Management Plan.</b>	For accuracy and in response to a Proposed Submission representation from English Heritage/Historic England.	This greater clarity and improved choice of wording would not alter the assessment of the policy. <b>No further assessment required.</b>
MainMod25	94	CS18	3. The following <del>uses</del> will be supported: a. Improved <b>theatre,</b> conference and exhibition facilities <b>including maintenance of existing venues</b> b. Leisure and entertainment uses which could include cinema, casino, museum, restaurants and cafes c. <b>Limited</b> retail uses <b>that complement the role of the Winter Gardens and</b> <del>which</del> functionally integrate with the adjacent town centre retail core d. Hotel/Serviced Apartments e. Improved car and cycle parking	In response to Proposed Submissions representations from the Theatres Trust and English Heritage/Historic England and providing clarity around the retail that is supported by the Council as discussed at the Hearing Session.	Minor wording modifications to Policy CS18 add further clarity to the policy including specific reference to the Winter Gardens. A positive score is already recorded against SA Objective 14 'To protect and enhance the cultural heritage resource'. <b>No further assessment required.</b>
MainMod26	94	7.14	The Winter Gardens has great potential to strengthen and widen its range of uses through sensitive remodelling and enhancement. It offers exceptional opportunities to locate year round leisure uses in the heart of Blackpool Town Centre. <b>A number of retail uses currently exist along the Church Street and Coronation Street facades. The policy supports additional limited retail uses that complement the role of the Winter Gardens</b> and <del>to</del> physically and functionally integrates Blackpool's principal retail core with Abingdon Street and the north	Responding to a Proposed Submission representation from English Heritage/Historic England around retail uses supported for the Winter Gardens.	The minor modification simply adds additional detail and clarity to the text regarding retail use and context of Winter Gardens. The modification would not affect the assessment results. <b>No further assessment required.</b>

Modification Number	Page No.	Policy / Paragraph	Proposed Main Modification	Reason for Modification	SA Comment
			of the town centre.		
MainMod27	95	CS19 (2)	b. <del>Major foodstore and other supporting</del> Retail development <b><u>that supports the existing major foodstore</u></b> , including cafes and restaurants	Update regarding the completion of the foodstore.	This is a very minor modification to the policy which would not alter the assessment. <b>No further assessment required.</b>
MainMod28	96	CS20 (2)	b. Integrate with and support, <b><u>whilst not undermining</u></b> existing resort core uses and attractions	Responding to discussion with the Inspector and Blackpool Pleasure Beach.	This provides further clarity to the policy and extra strength although the overall assessment would not change significantly. <b>No further assessment required.</b>
MainMod29	99	7.31	Blackpool has a number of well-known visitor attractions which make an important contribution to the overall resort offer. Proposals for high quality tourism related development <b><u>including ancillary retail and food and beverage uses (A3 and A5) specifically related to marketing the existing tourism offer</u></b> will be supported which complements and reinforces the role of these existing important attractions, securing their long term future.	Responding to discussion with the Inspector and Blackpool Pleasure Beach at the Hearing Sessions and providing support for ancillary uses.	The addition of this text provides clarity as to what is meant by 'tourism related development'. This minor modification would not alter the scores recorded in the SA. <b>No further assessment required.</b>
MainMod30	100	CS22	Additional policy wording:  <b><u>4. Any change in parking provision as a result of major redevelopment must not undermine the resort's ability to accommodate visitor trips.</u></b>	Responding to discussion with the Inspector and Blackpool Pleasure Beach at the Hearing Sessions.	The addition of this policy wording further supports sustainable tourism in Blackpool. However, it would not change the assessment scores as a major positive is recorded against SA Objective 8 ' <i>To promote sustainable tourism</i> '. <b>No further assessment required.</b>

Modification Number	Page No.	Policy / Paragraph	Proposed Main Modification	Reason for Modification	SA Comment
MainMod31	101	7.39	A number of key development sites are located within or adjacent to resort gateways. These include the Central Business District (Talbot Road gateway) and the Leisure Quarter and Rigby Road sites (Central Corridor and Central Drive gateways). Major redevelopment of these sites will provide a catalyst for further intervention and investment along the respective resort gateways. The sites contain a significant portion of resort/town centre car park provision. Any change in parking provision as a result of major redevelopment must not undermine the resort's ability to accommodate visitor trips, <b><u>recognising the peaks and troughs of demand for car parking</u></b> . To facilitate major redevelopment the Council will provide assistance to assemble sites and properties where appropriate.	Responding to discussion with the Inspector and Blackpool Pleasure Beach at the Hearing Sessions.	As above, although this is welcome detail and is positive for both tourism and access, the addition of this text would not alter the assessment. <b>No further assessment required.</b>
MainMod32	111	CS25	2. The Council will work with Fylde Borough Council, the Environment Agency and utility providers to ensure that any housing development on adjoining lands around Junction 4 of the M55 <del>will not</del> <b><u>most appropriately manages the</u></b> impact on the existing surface water and waste water network within Blackpool.	In response to a Proposed Submission representation from United Utilities.	It is assumed that if surface water and waste water is appropriately managed and accommodated then it would not be an adverse impact. Therefore this amendment would not alter the assessment scores. <b>No further assessment required.</b>
MainMod33	111	CS25 supporting text	New paragraph after para 8.21:  <b><u>Any housing development must not have a significant impact upon the foraging/ roosting habitat of any of the "Annex 1" listed bird species that visit 'Natura 2000' sites (Morecambe Bay and Ribble and Alt estuaries). Any proposals may require licensed mitigation in accordance with existing best practice and legislative</u></b>	Responding the Inspector's issue raised at the hearing sessions	Although not an addition to Policy CS25, this addition to the supporting text makes the policy more robust and so a positive score should be recorded against SA Objective 12 'To protect and enhance biodiversity'. The SA currently records a neutral score

Modification Number	Page No.	Policy / Paragraph	Proposed Main Modification	Reason for Modification	SA Comment
			<u>requirements to protect wildlife.</u>		so this represents an improvement in terms of the robustness of ecological protection <b>No further assessment required.</b>
MainMod34	112	CS26	<p>Prior to developing a local policy framework through the neighbourhood planning process development on the remaining lands of the Moss will be limited to:</p> <p>a. Conversion or change of use of existing buildings for agricultural or horticultural purposes</p> <p>b. Outdoor recreational uses appropriate to a rural area</p> <p><del>c. New dwellings essential in relation to the agricultural or horticultural use of the land</del></p> <p><b><u>c. New homes that meet the requirements of NPPF paragraph 55</u></b></p> <p><del>3. d.</del> <b>d.</b> Extensions or replacements dwellings in keeping with the scale and character of the area and not exceeding 35% of the original ground floor footprint of the existing dwelling</p>	Responding to the Proposed Submission representation from CW Planning and suggested amendment from the Inspector to ensure the policy aligns with para 55 of NPPF.	Aligning the text with the NPPF would not change any scores recorded against Policy CS26 as these broad principles were already assumed in the assessment. <b>No further assessment required.</b>
MainMod35	-	Evidence Base – Habitats Regulations Assessment	Emphasise in conclusions to HRA that Appropriate Assessment is not required.	Responding the Inspector’s issue raised at the hearing sessions	Noted. <b>No further assessment required.</b>

