

# **Blackpool Local Plan 2012 – 2027**

## **Part 1: Core Strategy**

### **Statement of Compliance with the Duty to Co-operate**

**Final**

**November 2014**

Note:

This Statement of Compliance with the Duty to Co-operate covers the Proposed Submission version of the Blackpool Local Plan Part 1: Core Strategy 2012-2027 Development Plan Document (DPD), which is to be submitted to the Secretary of State for Examination on 19 December 2014.

A draft of this statement was issued alongside the Proposed Submission version of the Local Plan Part 1 to enable all neighbouring authorities and “prescribed” bodies under Section 33A of the Planning and Compulsory Purchase Act 2004<sup>1</sup> and all other interested parties to comment on this legal requirement should they wish, through representation to the Proposed Submission document.

That draft has now been updated to this final version of the Statement to reflect comments made by neighbouring authorities and “prescribed” bodies. Appendix 1 has also been added which provides the full responses of each neighbouring authority / “prescribed” body who chose to respond to the draft Statement of Compliance and these demonstrate that Blackpool Council’s neighbours and the “prescribed” bodies recognise that Blackpool Council have appropriately co-operated with them on the preparation of the Local Plan Part 1: Core Strategy.

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<sup>1</sup> As amended by Section 110 of the Localism Act 2011

## 1.0 Introduction

1.1 The Duty to Co-operate (the Duty) is set out in Section 33A of the Planning and Compulsory Purchase Act 2004 as amended by Section 110 of the Localism Act 2011<sup>2</sup>. This Duty applies to all local planning authorities (LPAs), county councils in England and a number of other “prescribed” bodies<sup>3</sup> requiring them to co-operate with each other to address strategic matters relevant to their areas in the preparation of a development plan document (DPD). The Duty requires ongoing constructive and active engagement on the preparation of DPDs and other activities relating to the sustainable development and use of land.

1.2 Paragraph 181 of the National Planning Policy Framework (NPPF) states that “*Local planning authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination*”. The paragraph also provides examples of how evidence of co-operation may be demonstrated, such as jointly prepared strategies or planning policies, joint committees with neighbouring authorities to make decisions or memorandums of understanding to agree how authorities and bodies will cooperate with each other as they prepare planning policy or strategy.

1.3 The NPPF provides further guidance on the Duty, focusing on “*planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156*”, (p37, NPPF). The NPPF is clear that LPAs and other public bodies should work collaboratively on these strategic priorities and reflect this in Local Plans. The strategic priorities highlighted in the NPPF are:

- the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including Landscape

1.4 It is these strategic priorities that provide the framework for this Statement of Compliance, and Table A on page 8 addresses the strategic priorities for Blackpool in turn.

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<sup>2</sup> Section 110 of the Localism Act 2011, which adds a new section (33A) into the Planning and Compulsory Purchase Act 2004 relating to the Duty.

<sup>3</sup> Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out who are the “prescribed” bodies.

## 2.0 The Blackpool Context

2.1 Blackpool is a unitary authority located within the Fylde Coast sub-region. Some 11.2 km of seafront comprises its western boundary with neighbouring two-tier authorities of Fylde and Wyre Borough Councils with Lancashire County Council (LCC) (as the upper tier authority) to the north, east and south of Blackpool.

2.2 The Fylde Coast sub-region demonstrates a high level of self-containment in terms of housing markets, travel to work patterns and economic functionality. The economic functionality of the Fylde Coast is apparent through the strong travel to work patterns and a shared tourism and cultural offer; regionally and nationally significant advanced engineering and manufacturing (AEM) sector at the Lancashire Enterprise Zone (BAE Systems at Warton and nuclear processing at Westinghouse, Springfields); the Department for Work and Pensions; and a shared infrastructure including Blackpool International Airport, coastal tramway and strategic highway and rail networks.

2.3 Blackpool itself is intensely urban and compact, largely built up to its boundaries. The local economy is underpinned by the tourism and service sectors, with a small manufacturing sector including local specialism in food, drink and plastics. The inner areas of the town are densely populated and experience a high concentration of acute deprivation leading to extreme health, social and economic inequalities. Open land in the east of the town has important landscape, nature conservation and amenity value. Designated Green Belt and Countryside Areas on the edge of Blackpool define the limit of urban development to retain separation between Blackpool, Fylde and Wyre.

## 3.0 Cooperation in the context of the Core Strategy

3.1 The following are the local planning authorities, county councils and “prescribed” bodies that are relevant within the context of the Duty to Co-operate for Blackpool:

Fylde Borough Council (as neighbouring authority)
Wyre Borough Council (as neighbouring authority)
Lancashire County Council (as a neighbouring transport authority, highway authority, education authority, public health authority and as waste and minerals authority)
Environment Agency
English Heritage
Natural England
Highways Agency
Civil Aviation Authority
Homes and Communities Agency
Blackpool Clinical Commissioning Group*
The National Health Service Commissioning Board (NHS England)*

The Office of Rail Regulation
Marine Management Organisation
Lancashire Local Enterprise Partnership (including Transport for Lancashire)
Local Nature Partnership

\*(Post 1 April 2013 the Primary Care Trust has been replaced and health responsibilities now lie with the above bodies and Blackpool Council as Public Health Authority)

3.2 Blackpool Council has also co-operated with several other bodies and organisations on strategic issues relevant to the Local Plan including Network Rail and various utility providers (See Table A).

3.3 Given its location within Lancashire, Blackpool Council has engaged and worked with local planning authorities across the area on specific issues (identified in Table A), not just those directly bordering Blackpool. This includes the following Lancashire authorities:

Lancaster	Rosendale
Ribble Valley	Hyndburn
Preston	Burnley
South Ribble	Pendle
Chorley	West Lancashire
Blackburn with Darwen (Unitary)	

**Memorandum of Understanding between Blackpool Council, Fylde and Wyre Borough councils and Lancashire County Council**

3.4 Working together with the neighbouring authorities of Fylde and Wyre and LCC on strategic planning issues is long established and pre-dates the Duty to Co-operate. Engagement on issues of common concern with respect to housing, employment land, transport infrastructure, minerals and waste, has been ongoing for many years. The Joint Lancashire Structure Plan adopted in 2005 was the result of Blackpool Council jointly working with LCC and Blackburn with Darwen Borough Council engaging with the district councils across Lancashire. The current Joint Lancashire Minerals and Waste Local Plan was produced through joint working with LCC, Blackpool Council and Blackburn with Darwen Council as the responsible bodies for Minerals and Waste in Lancashire supported by a Joint Advisory Committee. The three Fylde Coast authorities with LCC are currently collaborating on the Fylde Coast Highways and Transport Masterplan.

3.5 To assist in meeting the requirements of the Duty and in the context of the Fylde Coast it was agreed between the four authorities to establish a Memorandum of Understanding (MOU) (Appendix 2 refers) to formalise the ongoing dialogue and co-operation that currently exists for those strategic planning issues which require cross

boundary co-operation and collaboration to ensure the requirements of the Duty are met. The MOU has informed Table A (at page 10 of this document).

### **Strategic Issues and Collaboration**

3.6 Table A provides a summary of the collaborative work that Blackpool Council has undertaken in preparing the Core Strategy and who has co-operated on each aspect of that work. The Table takes into account the five strategic priorities set out in paragraph 156 of the NPPF and identifies strategic issues specific to Blackpool under each of these priorities where relevant. A summary of each of the strategic issues is then briefly set out, along with who is affected/obliged to co-operate on that issue, who has co-operated with whom, and how this was done, and finally the outcome of that co-operation for that strategic issue.

3.7 As well as the co-operation undertaken on the strategic issues set out in Table A, Blackpool Council has collaborated with several of the 'prescribed' bodies as a matter of course throughout the preparation of the Plan.

#### The Environment Agency, English Heritage, Natural England and Marine Management Organisation

3.8 These four organisations are statutory consultees in the DPD preparation process and therefore have been consulted at all stages of preparation of the Core Strategy DPD, as well as the Sustainability Appraisals (SA) and Habitat Regulations Assessments (HRA) at each stage of preparation.

3.9 In addition, the Environment Agency have co-operated with Blackpool Council on a number of matters relating to flood risk, drainage and waste water treatment throughout the preparation of the Local Plan, including the preparation of the Strategic Flood Risk Assessment (SFRA).

#### The Homes and Communities Agency (HCA)

3.10 The HCA have been consulted as a statutory consultee since 2009. They have co-operated mainly on matters relating to the inner area housing intervention including the Rigby Road development (Foxhall Village) and various sites and locations in Blackpool Town Centre including the Central Business District (Talbot Gateway) and the Leisure Quarter site (formerly Central Station).

#### Blackpool, Fylde and Wyre Primary Care Trust (PCT)

3.11 The PCT (prior to 1 April 2013) has been consulted as a statutory consultee throughout the preparation of the Core Strategy DPD. However, from 1 April 2013 the PCT has been replaced by the Blackpool Clinical Commissioning Group, NHS England and Blackpool Council as Public Health Authority.

### Transport and Highway Authorities

3.12 Blackpool Council as a Unitary authority has responsibility for transport and highways. Lancashire County Council (LCC), as transport authority and highway authority covering Fylde and Wyre have been consulted throughout the preparation of the Core Strategy DPD. This has informed all aspects of transport infrastructure provision in the Core Strategy and the potential impacts on transport infrastructure of the development proposals in the Core Strategy. In particular, LCC have worked closely with Blackpool in considering the highways / traffic and public transport issues of proposed development on the Fylde/Blackpool southern boundary and the A585. Continued collaboration with LCC, Fylde and Wyre is progressing the Fylde Coast Highways and Transport Masterplan which sets out the transport priorities for the area to 2030.

### Civil Aviation Authority

3.13 The Civil Aviation Authority has been consulted at all stages of the preparation of the Core Strategy.

### Lancashire Local Enterprise Partnership (LEP)

3.14 There is ongoing dialogue with the LEP and a representative is invited to attend the Fylde Coast Authorities and LCC MOU officer meetings on a quarterly basis. Blackpool Council has worked closely with the LEP and LCC in the development of the Strategic Economic Plan (SEP) submitted to Government in March 2014. The LEP Growth Plan and the priorities for Blackpool within the SEP align with the overall strategy set out in the Core Strategy. In addition and in line with the Growth Plan, a Fylde Coast Local Growth Accelerator Strategy and Action Plan is currently being developed by the Blackpool, Fylde and Wyre Economic Development Company.

### **Impact on Neighbouring Authorities**

3.15 The final column of Table A sets out where the Blackpool Core Strategy may have an impact on neighbouring authorities. This shows that there are some cross boundary strategic issues which require continued collaboration and monitoring to demonstrate the legal compliance aspect of the Duty and the soundness aspects of the Duty.

3.16 Paragraph 182 of NPPF describes how a plan that is positively prepared is one that also meets *“the unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development”*.

3.17 In relation to this no neighbouring authority has approached Blackpool Council to meet any unmet requirement. With respect to housing in Blackpool the Housing Requirement Technical Paper 2014 sets out Blackpool’s objectively assessed need which can be met on sites within Blackpool, therefore there has been no need to request any unmet housing requirement to a neighbouring authority. However, with respect to employment land, due to the highly constrained nature of Blackpool and

the lack of sites suitable for employment within the Borough, Blackpool Council requested Fylde Borough Council to provide around 14ha of Blackpool's employment land requirement. Fylde Borough Council has agreed to meet this unmet requirement through strategic land allocations in the emerging Fylde Local Plan (Part 1).

3.18 With respect to the retail hierarchy Blackpool is identified as the sub-regional centre for the Fylde Coast and will therefore serve the comparison needs of residents within neighbouring authorities commensurate with its sub-regional role. The future comparison floorspace growth of Blackpool Town Centre reflects the findings of the joint Fylde Coast Retail Study 2011 agreed by all three Fylde Coast Authorities in that the future growth of Blackpool is not capturing growth intended for the main centres in Fylde and Wyre.

3.19 While Table A provides a summary of the co-operation on strategic issues that Blackpool Council have facilitated or been a part of and the outcomes this cooperation has resulted in, further detail is provided below with respect to the co-operation with neighbouring authorities and "prescribed" bodies in relation to officer-level meetings referenced in Table A.

3.20 Blackpool Officers regularly meet on a 6 weekly basis with colleagues from Fylde and Wyre Borough Councils and Lancashire County Council (LCC) under the Duty to Co-operate Fylde Coast Authorities and LCC Officer Meetings to discuss strategic matters specific to the relationship between Blackpool and its neighbours. The Lancashire Enterprise Partnership and the Blackpool Fylde and Wyre Economic Development Company EDC are also invited to attend these meetings.

3.21 Blackpool officers are also part of the Lancashire Development Plans Officer Group where colleagues from across the county (including the 2 Unitary Authorities of Blackpool and Blackburn with Darwen) regularly meet every quarter to discuss matters that affect the whole county and that are cross-boundary and strategic in nature.

3.22 The Fylde Peninsula Water Management Group meets on a monthly basis to discuss a number of water management issues including surface water drainage, flooding and bathing water quality. The group includes representatives from neighbouring authorities LCC, the Environment Agency (EA) and United Utilities (UU) and other stakeholders.

3.23 In addition, the relationship with the EA and UU, who have met with Blackpool Council on many occasions to specifically discuss the Local Plan, has been important given the key infrastructure constraints with regard to surface water drainage and wastewater issues in the Borough. The EA and UU and Blackpool Council have co-operated fully and openly in order to achieve the best balance in resolving infrastructure constraints but still meeting development needs.

3.24 The Fylde Coast Strategic Transport Group meets on a 4 monthly basis and includes officers from the three Fylde Coast authorities, LCC and representatives from

the Highways Agency to discuss a range of strategic transport related matters including the Fylde Coast Highways and Transport Masterplan.

3.25 In relation to formal consultation, all neighbouring authorities and “prescribed” bodies have been consulted on the preparation of the Local Plan (in line with the relevant regulations at the time) and this is set out in the Council’s Statement of Consultation (June 2014) and the Summary of Representations to the Proposed Submission Core Strategy Regulation 22 (1) (c) (v) Statement (November 2014).

## **4.0 Summary**

4.1 Blackpool Council has demonstrated a high level of co-operation with other authorities and public bodies in the preparation of the Core Strategy. In particular it has established a Memorandum of Understanding with its neighbouring authorities and collaborated and prepared joint key evidence base documents and has worked closely with key infrastructure providers to ensure that the Core Strategy will deliver the infrastructure required.

4.2 This approach has resulted in a robust and sound evidence base for the Core Strategy which is reflected in the largely positive support the Core Strategy has received from neighbouring authorities and other bodies featured in this document.

4.3 Blackpool Council is not aware of any objections to the overall soundness by neighbouring authorities and other ‘prescribed bodies’ as reflected in the public representations and subsequent discussions and no concerns have been expressed by those same organisations regarding the level of co-operation undertaken by Blackpool Council.

**Table A: Duty to Co-operate - Strategic Issues for Blackpool and Evidence of Co-operation in preparing the Blackpool Local Plan Part 1: Core Strategy**

Terminology:

BC – Blackpool Council

Neighbouring authorities – Fylde Borough Council and Wyre Borough Council

LCC – Lancashire County Council

Lancashire Authorities – Lancaster, Ribble Valley, Preston, Sth. Ribble, Chorley, Blackburn with Darwen, Rossendale, Hyndburn, Burnley, Pendle West Lancashire

LEP – Lancashire Enterprise Partnership

HCA – Homes and Communities Agency

EDC - Blackpool Fylde and Wyre Economic Development Company

CCG – Clinical Commissioning Group (pre 1 April 2013 part of the PCT (Primary Care Trust))

DPOG – Development Plans Officer Group

DtC – Duty to Co-operate

MOU – Memorandum of Understanding between Blackpool Council, LCC, Fylde and Wyre Borough Councils

SHMA – Strategic Housing Market Assessment

SHLAA – Strategic Housing Land Availability Assessment

The Framework (NPPF) Strategic Priority (Para 156)	What is the nature of the strategic Issue?	Who is affected/ Obligated to Co-operate	Who has co-operated With whom and How was this done	Evidence	Outcome	Impact on Neighbouring authorities
<b>Homes and Jobs</b>	<b>Housing Delivery:</b> to meet identified needs in the context of the wider sub regional housing market and to establish a more balanced and wider housing choice in the housing market area (HMA)	BC and neighbouring authorities	<p>Blackpool has co-operated with neighbouring authorities in:</p> <ul style="list-style-type: none"> <li>Defining/refining the housing target proposed in the Core Strategy;</li> <li>ensuring a more balanced and wider housing choice in the HMA;</li> <li>promoting a strong and distinctive sustainable urban extension closely integrated with the surrounding areas on land on the Fylde/Blackpool boundary around Junction 4 of the M55</li> <li>agreeing the policy approach for lands comprising Marton Moss</li> <li>agreeing complementary/joint approaches to the delivery and accessibility of affordable housing</li> </ul> <p>Co-operation with neighbouring authorities has been through:</p> <ul style="list-style-type: none"> <li>the preparation of joint evidence documents for the Fylde Coast;</li> <li>formal dialogue through Fylde Coast DtC officer meetings;</li> <li>informal dialogue and formal consultation at each stage of preparation of the Blackpool Core Strategy and Fylde and Wyre Local Plans;</li> <li>consultation on the draft affordable housing SPD;</li> <li>involvement in the preparation of Blackpool’s Core Strategy Viability Study;</li> <li>agreeing a consistent approach to the SHLAA methodology and consultation on the draft SHLAA;</li> <li>consultation with Lancashire Authorities on the latest SHMA (published March 2014)</li> </ul>	<p>Core Strategy Policies CS1, CS2, CS12, CS13, CS14, CS25, CS26.</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>Fylde Coast Strategic Housing Market Assessment (published March 2014) superseding 2008 SHMA;</li> <li>Towards an objective assessment of Housing need in Blackpool (May 2014);</li> <li>Blackpool Local Plan and Community Infrastructure Levy – Viability Study Report Feb 2014;</li> <li>Blackpool 2013 SHLAA update as well as 2008 SHLAA and subsequent updates;</li> <li>Blackpool Housing Requirement Technical Paper May 2014 (superseding 2012 paper)</li> <li>Blackpool Council’s Affordable Housing SPD (Draft)</li> <li>Fylde coast Housing Strategy 2009</li> <li>Fylde Coast Local Investment Agreement 2011-2014</li> </ul> <p>Other:</p> <ul style="list-style-type: none"> <li>DtC MOU Officer Meetings (6 weekly basis);</li> <li>Development Plans Officers’ Group (DPOG quarterly meetings)</li> <li>Joint meetings with Blackpool and Fylde in respect of major planning application at Whyndyke Farm.</li> </ul>	<p>No objection made to each Fylde Coast Authorities derived housing requirement figure to date.</p> <p>No requests from neighbouring authorities for Blackpool to help to meet any of their housing requirement figure to date.</p> <p>No request form Blackpool for neighbouring authorities to help meet Blackpool housing requirement figure.</p> <p>No objection by Lancashire authorities to the Fylde Coast SHMA methodology or outcomes.</p>	<p>No impact on neighbouring authorities.</p> <p>The housing target proposed in the Core Strategy meets the objectively assessed needs of Blackpool (set out in the Housing Technical Paper 2014). The Core Strategy does not require neighbouring authorities to deliver any part of Blackpool’s housing requirement.</p> <p>In meeting its own housing requirement figure Blackpool is not able to accommodate any unmet need of neighbouring authorities if such a request is made.</p>

The Framework (NPPF) Strategic Priority (Para 156)	What is the nature of the strategic Issue?	Who is affected/ Obligated to Co-operate	Who has co-operated With whom and How was this done	Evidence	Outcome	Impact on Neighbouring authorities
	<p><b>Employment Land Delivery:</b> to meet identified employment land needs in the context of the wider sub-regional market area to strengthen, promote and enhance the economy</p>	BC, Neighbouring authorities, EDC	<p>Blackpool has co-operated with neighbouring authorities with respect to:</p> <ul style="list-style-type: none"> <li>▪ consideration of future employment development for the sub-region in response to the strong links between the FCAs in terms of travel to work patterns and employment;</li> <li>▪ agree the sub-regional employment land requirement;</li> <li>▪ agree the strategic priorities for land around junction 4 of the M55 – Fylde/Blackpool boundary with the aim of attracting major new economic development to help strengthen the Fylde Coast economy;</li> <li>▪ promote the sustainable development of the key strategic sites/corridors identified in the MOU. For Blackpool this includes: Blackpool International Airport corridor-Blackpool/Fylde boundary; Central Business District – Blackpool Town Centre; and Whyndyke Farm-Fylde/Blackpool boundary</li> </ul> <p>Co-operation with neighbouring authorities and the EDC has been through the preparation of evidence documents; formal dialogue through DtC MOU officer meetings; informal dialogue and formal consultation at each stage of preparation of the Blackpool Core Strategy and Fylde and Wyre Local Plans.</p>	<p>Core Strategy Policies CS3, CS19, CS24</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>▪ Blackpool Employment Land Study (2014), superseding 2007 employment land review and subsequent updates on land supply;</li> <li>▪ Blackpool Employment Land Technical Paper (2014) superseding 2012 paper;</li> <li>▪ Blackpool Local Economy Baseline Study (2011)</li> <li>▪ LEP Growth Plan 2013</li> <li>▪ LEP Strategic Economic Plan March 2014;</li> <li>▪ Growth Accelerator Strategy and Action Plan for Blackpool, Fylde and Wyre EDC (under preparation)</li> </ul> <p>Other:</p> <ul style="list-style-type: none"> <li>▪ DtC MOU officer Meetings (6 weekly basis);</li> <li>▪ Development Plans Officers’ Group (DPOG quarterly meetings)</li> <li>▪ Representations received from LCC, Wyre and Fylde Borough Council’s with respect to the supporting text</li> </ul>	<p>The Employment Land Study identified a requirement for 31.5ha of employment land over the plan period. Due to the highly constrained nature of Blackpool’s boundaries a realistic figure of around 17.8ha can be provided in Blackpool. BC has therefore requested Fylde to meet the remainder of this need (around 14ha) to which Fylde agreed and has included this in the emerging Fylde Local Plan: Part 1.</p> <p>No objection was received from neighbouring authorities to Blackpool’s employment land requirement figure.</p> <p>In response to representations from neighbouring authorities and LCC supporting text of Core Strategy amended accordingly.</p> <p>No requests from neighbouring authorities for Blackpool to help meet their employment land requirement.</p>	<p>Fylde Borough Council is accommodating around 14ha of employment land to help Blackpool meet its employment land requirement figure for the plan period to 2027.</p> <p>Because of Blackpool’s tightly drawn boundary and limited development land it is unable to accommodate any unmet need of neighbouring authorities if such a request is made.</p>
	<p><b>Commuting patterns:</b> Blackpool forms part of the Fylde coast travel to work area which shows that there is a close correlation between work and housing in the sub-region</p>	BC, LCC, Highways Agency, neighbouring authorities	<p>BC has consulted with neighbouring authorities and with LCC (as transport authority for the neighbouring authorities) and the Highways Agency regarding housing and employment land provision through informal meetings and dialogue and formal consultation at each stage of the Blackpool Core Strategy preparation and Fylde and Wyre Local Plans.</p>	<p>Policies CS5, CS27</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>▪ Blackpool Core Strategy Infrastructure Delivery Plan 2014</li> <li>▪ Fylde Coast Transport Study 2011 and 2012</li> <li>▪ Blackpool Local Transport Plan 2011</li> <li>▪ Blackpool Core Strategy Marton Moss/M55 Hub Traffic Impact Assessment 2011</li> <li>▪ Sub-Region Transport Framework for Lancashire 2009</li> <li>▪ Fylde Coast Highways &amp; Transport Masterplan (under preparation)</li> </ul> <p>Other:</p> <ul style="list-style-type: none"> <li>▪ Fylde Coast Strategic Transport Group meetings</li> <li>▪ Lancashire Development Plans Officer Group (DPOG)</li> </ul>	<p>While the Core Strategy proposes to deliver new employment land (and with it new employment opportunities) it is accepted that BC has close economic links with neighbouring authorities and this relationship will continue. This is highlighted by the ongoing collaboration on the development of the Fylde Coast Highways and Transport Masterplan.</p> <p>There is a clear working relationship between BC and LCC as the Transport Authority for Lancashire and the Highways Agency. The Blackpool Infrastructure</p>	<p>The Core Strategy confirms and continues Blackpool’s role as part of the Fylde Coast Travel to work area, balancing employment and housing provision avoiding any significant change in commuting patterns across the sub-area.</p>

The Framework (NPPF) Strategic Priority (Para 156)	What is the nature of the strategic Issue?	Who is affected/ Obligated to Co-operate	Who has co-operated With whom and how Was this done	Evidence	Outcome	Impact on Neighbouring authorities
					Delivery Plan has been informed by the various studies and transport plans. The Core Strategy policies require investment in sustainable transport infrastructure particularly with respect to South Blackpool Growth and Enhancement.	
	<b>Provision for Travellers:</b> Delivery of sites to meet the identified needs of Travellers in the wider sub-area context	BC, Neighbouring authorities and LCC and Lancashire Authorities.	<p>Blackpool has co-operated with neighbouring authorities to:</p> <ul style="list-style-type: none"> <li>▪ Identify and provide for the accommodation needs of Gypsy, Traveller and travelling Showpeople communities across the Fylde Coast sub-region.</li> </ul> <p>Co-operation with neighbouring authorities has been through the preparation of joint evidence documents for the Fylde Coast; formal dialogue through DtC MOU officer meetings; informal dialogue and formal consultation at each stage of preparation of the Blackpool Core Strategy and Fylde and Wyre Local Plans.</p>	<p>Core Strategy Policy CS16</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>▪ Joint Fylde Coast Authorities Gypsy and Traveller and Travelling Showpeople Accommodation Assessment Update 2014 (GTAA)</li> </ul> <p>Other:</p> <ul style="list-style-type: none"> <li>▪ DtC MOU officer Meetings</li> <li>▪ Lancashire Development Plans Officer Group (DPOG)</li> <li>▪ DPOG Sub Group - Traveller Forum</li> </ul>	<p>No objections received from neighbouring authorities to Policy CS16. Additional criteria added to Policy CS16 to address comments from Wyre Borough Council relating to CLG guidance.</p> <p>The GTAA 2014 identifies the future need in Blackpool, Fylde and Wyre for pitches and yards over the Local Plan timescale.</p> <p>For Blackpool, the site allocations for Gypsy and Travellers and Travelling Showpeople will be set out in the Site Allocations and Development Management Policies document (Part 2 of the Blackpool Local Plan) as programmed in the Local Development Scheme Update 2014</p>	BC will work with Fylde and Wyre Councils in meeting the needs of Travellers and Travelling Showpeople across the Fylde coast sub-region to ensure the requirements set out in the 2014 GTAA are met through the local plan preparation.

The Framework (NPPF) Strategic Priority (Para 156)	What is the nature of the strategic Issue?	Who is affected/ Obligated to Co-operate	Who has co-operated With whom and how was this done	Evidence	Outcome	Impact on Neighbouring authorities
<b>Retail, Leisure and other commercial development</b>	<b>Retail provision and sub-regional hierarchy of centres:</b> to establish the role of town centres within the Fylde Coast and their position in the retail hierarchy and future retail growth.	BC, neighbouring authorities.	BC has co-operated with neighbouring authorities to establish the retail hierarchy across the Fylde Coast and the appropriate retail needs in terms of future comparison and retail floorspace, through undertaking a Joint Retail Study for the Fylde Coast (2011)  Co-operation with neighbouring authorities has been through the preparation of joint evidence documents for the Fylde Coast; formal dialogue through DtC MOU officer meetings; informal dialogue and formal consultation at each stage of preparation of the Blackpool Core Strategy and Fylde and Wyre Local Plans.	Core Strategy Policies CS4, CS17  Documents: <ul style="list-style-type: none"> <li>▪ Fylde Coast Retail Study 2011</li> <li>▪ Blackpool Town Centre Strategy 2013</li> </ul> Others: <ul style="list-style-type: none"> <li>▪ DtC MOU officer meetings</li> <li>▪ Development Plans officer Group meetings (DPOG)</li> </ul>	The Core Strategy establishes Blackpool Town Centre as the sub-regional centre for the Fylde Coast and identifies retail growth of comparison goods to supports this sub-regional role.  Neighbouring authorities, LCC and Lancashire authorities have not raised any objection to the retail policies in the Core Strategy.  The Core Strategy confirms the status of the retail centres in Blackpool and proposes a proportionate approach to investment in retail provision in line with the role of Blackpool Town Centre and the findings of the Joint Retail Study.	Blackpool Town Centre as the sub regional centre for the Fylde Coast will serve the needs of residents across the sub-area.
<b>Infrastructure</b>	<b>Transport:</b> National and regional connectivity is important to Blackpool due to its reliance on the tourism economy as the UK's largest seaside resort therefore there is a need to manage the impact of development on the strategic transport network  <i>Strategic issues with respect to infrastructure requirements to support commuting patterns between homes and jobs are dealt with on page 9.</i>	BC, neighbouring authorities, LCC Highways Agency, Network Rail	BC has co-operated with neighbouring authorities and LCC to address: <ul style="list-style-type: none"> <li>▪ Improvements to the A585(T)</li> <li>▪ Safeguarding land (in Fylde and Wyre) for the M55 to Norcross Link Rd. to relieve long term road congestion</li> <li>▪ Sustainable development of Blackpool International Airport as an economic priority for the sub-area</li> <li>▪ Improvements to Preston Railway Station and accessibility to Fylde Coast towns</li> <li>▪ Further improvements to the tram network to assist north-south movements along the coast from Fleetwood to Starr Gate; links to the Central Business District (Talbot Gateway) and the airport and to integrate the tramway with other modes of transport including the potential of the South Fylde rail link.</li> </ul> BC has consulted with neighbouring authorities and LCC, the Highways Agency and Network Rail regarding the impact of policies in the Core Strategy on transport infrastructure. This has been through formal meetings (including DtC MOU officer meetings and Fylde Coast Strategic Transport Group meetings); informal dialogue and formal consultation at each stage of preparation of the Blackpool Core Strategy and Fylde and Wyre Local Plans.	Policies CS5 and CS27  Documents: <ul style="list-style-type: none"> <li>▪ Blackpool Core Strategy Infrastructure Delivery Plan 2014;</li> <li>▪ Fylde Coast Transport Study 2011 and 2012;</li> <li>▪ Blackpool Local Transport Plan 2011;</li> <li>▪ Blackpool Core Strategy Marton Moss/M55 Hub Traffic Impact Assessment 2011;</li> <li>▪ Sub-Region Transport Framework for Lancashire 2009;</li> <li>▪ Fylde Coast Highways and Transport Masterplan (under preparation)</li> </ul> Other: <ul style="list-style-type: none"> <li>▪ DtC MOU officer meetings</li> <li>▪ Fylde Coast Strategic Transport Group meetings</li> <li>▪ Lancashire Development Plans Officer Group (DPOG);</li> <li>▪ Blackpool Airport Infrastructure Planning and Development Liaison Group (includes representation from Blackpool Airport, BC, LCC, Fylde BC, Wyre BC, LCC and the Fylde Coast Economic Development Company</li> </ul>	Policies CS5 and CS27 identify proposals for new or improved strategic transport infrastructure with respect to road, public transport and air travel.  No objections from neighbouring authorities, transport authorities, Highways Agency or Network Rail to the transport policies in the Core Strategy however comments were received from Wyre Borough Council and LCC and Network Rail which have been responded to.  There is a clear working relationship between BC and LCC as the Transport Authority for Lancashire and the Highways Agency and this is highlighted by ongoing collaboration on the development of the Fylde Coast Highways and Transport Masterplan.	While the impact of the Core Strategy proposals on transport infrastructure will be most keenly felt within Blackpool, due to Blackpool's role as the UKs largest seaside resort there will be additional usage of the strategic transport infrastructure within neighbouring authorities but this will be in a manner consistent with existing travel patterns.  The Core Strategy supports wider strategic improvements to infrastructure in South Blackpool on the Blackpool/Fylde boundary benefiting sub-regional connectivity

The Framework (NPPF) Strategic Priority (Para 156)	What is the nature of the strategic Issue?	Who is affected/ Obligated to Co-operate	Who has co-operated With whom and How was this done	Evidence	Outcome	Impact on Neighbouring authorities
	<p><b>Water-related infrastructure</b> is a key cross boundary issue which directly affects the delivery of built development across the Fylde Coast.</p> <p>The main issues relate to surface water drainage; the capacity of the existing sewerage network and the need to ensure that proposals for new development have no adverse effect on bathing water quality along the Fylde Coast.</p>	<p>BC, neighbouring authorities, LCC, Environment Agency, United Utilities</p>	<p>BC has co-operated with neighbouring authorities, and LCC to :</p> <ul style="list-style-type: none"> <li>▪ Agree a common approach to surface water and waste water management to ensure the delivery of the required infrastructure improvements needed to accommodate future development requirements are not compromised.</li> </ul> <p>Throughout the Core Strategy preparation BC has engaged closely with/collaborated with neighbouring authorities, the Environment Agency (EA) and United Utilities (UU) in preparing various studies with respect to examining water supplies, surface water drainage and flood risk and bathing water quality.</p> <p>Fylde Peninsula Water Management Group is a partnership including, BC and LCC (Lead Local Flood Authorities), neighbouring authorities, EA and UU. The partnership aims to improve coastal protection, improve the quality of the Fylde Coast's bathing waters and beaches, and reduce the risk of surface water flooding.</p> <p>BC has also worked closely with EA and UU on the Infrastructure Delivery Plan</p>	<p>Core Strategy Policy CS9</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>▪ Central Lancashire and Blackpool Outline Water Cycle Study (December 2011)</li> <li>▪ Fylde Peninsular SUDS Study (Atkins 2013)</li> <li>▪ Beach Management Activities along the Fylde Coast – Possible Measures to Control Local Bathing Water Quality (January 2013)</li> <li>▪ An Action Plan to Improve Bathing Waters across the Fylde Peninsula (Draft Feb 2013)</li> <li>▪ Lancashire and Blackpool Local Flood Risk Management Strategy (2014)</li> <li>▪ Surface Water Management Plan (in preparation)</li> <li>▪ Blackpool Infrastructure Delivery Plan (2014)</li> </ul> <p>Other:</p> <ul style="list-style-type: none"> <li>▪ DtC MOU officer meetings</li> <li>▪ Fylde Peninsula Water Management Group</li> <li>▪ Lancashire Development Plans Officer Group (DPOG)</li> <li>▪ Officer meetings with respect to current major planning application at Whyndyke Farm</li> <li>▪ Comments received from the Environment Agency and United Utilities including formal representations to the consultation.</li> </ul>	<p>No objections to Policy CS9 were received from neighbouring authorities with respect to water management issues.</p> <p>Comments received from the Environment Agency and United Utilities have been responded to and policy rationalised to provide a new Policy CS9 which sets out the requirements with respect to managing flood risk, surface water, water quality and the efficient use of water resources</p>	<p>No impact on neighbouring authorities.</p> <p>Ongoing collaboration with neighbouring authorities, LCC, EA and UU to ensure the required water-related infrastructure is delivered.</p>

The Framework (NPPF) Strategic Priority (Para 156)	What is the nature of the strategic Issue?	Who is affected/ Obligated to Co-operate	Who has co-operated With whom and How was this done	Evidence	Outcome	Impact on Neighbouring authorities
<b>Health, security, community and cultural infrastructure</b>	New development as proposed in the Core Strategy will have implications for a range of health, education, community and cultural providers	BC, LCC, PCT, NHS, since 2013 Public Health Authority, NHS England, Blackpool Clinical Commissioning Group, Emergency services, Sport England	A wide range of community infrastructure providers including those listed have been engaged on the Core strategy through formal consultation at each stage of the preparation and where required in informal dialogue.	Core Strategy policies CS6, CS12, CS15  Documents: <ul style="list-style-type: none"><li>▪ Blackpool Core strategy Infrastructure Delivery Plan</li></ul> Other: <ul style="list-style-type: none"><li>▪ DtC MOU officer meetings</li><li>▪ Officer meetings with respect to current major planning application at Whyndyke Farm</li><li>▪ Representation received from the PCT</li></ul>	There has been broad support for the Core Strategy as result of cooperation with a wide range of organisations throughout the preparation of the Core Strategy In particular collaboration in the provision of education, health and community facilities with respect to housing development on the southern Blackpool/ Fylde boundary at Whyndyke.  Comments received from the PCT have been responded to and the Core Strategy amended accordingly.	No adverse impact on neighbouring authorities.  Blackpool will be accommodating some of the secondary educational needs of the proposed housing located within that part of the Whyndyke Farm site that lies within Fylde. Collaboration is ongoing to finalise the financial contribution.
<b>Climate Change and natural and historic environment</b>	<b>Natural Environment - Managing impacts on habitats and/or landscape character designations</b>	BC, neighbouring authorities, LCC, Natural England	BC has co-operated with neighbouring authorities and LCC to: <ul style="list-style-type: none"><li>▪ Conserve and enhance natural habitats, biodiversity and landscapes of importance</li></ul> BC has collaborated with neighbouring authorities and LCC through formal DtC MOU officer meetings and consultation at each stage of preparation of the Blackpool Core Strategy and Fylde and Wyre local plans; and with Natural England through formal consultation.	Core Strategy policies CS6  Documents: <ul style="list-style-type: none"><li>▪ Core Strategy Habitats Regulations Assessment (HRA) Screening Reports</li><li>▪ Blackpool Core strategy Infrastructure Delivery Plan</li><li>▪ M55 Hub Habitats Survey (extended Phase 1 Report)</li></ul> Other: <ul style="list-style-type: none"><li>▪ DtC MOU officer meetings</li><li>▪ Lancashire Development Plans Officer Group (DPOG)</li><li>▪ Officer meetings with respect to current major planning application at Whyndyke Farm</li></ul>	The HRA has informed the Core Strategy taking into account the wider cross boundary implications of development on habitats within the Borough and elsewhere in the Fylde Coast sub-area. The HRA acknowledged that there would not be any direct impact on Natura 2000 sites but recommended amendments to Policy CS6 to address indirect impacts which have been incorporated into policy.	No direct impact on neighbouring authorities.  The importance of land to the south of Blackpool around Whyndyke and Whitehills in Fylde is acknowledged in the HRA as important for foraging Annex 1 bird species.

## **Appendix 1**

### Responses to the Duty to Cooperate - Draft Statement of Compliance



FAO: E. Jane Saleh

Planning Department  
Blackpool Council  
PO Box 17  
Corporation Street  
Blackpool Council FY1 1LZ

Our Ref: P/6 & P/15

Your Ref:

Please Ask For: Mark Evans

Telephone: 01253 658460

Email: [mark.evans@fylde.gov.uk](mailto:mark.evans@fylde.gov.uk)

Date: 08 December 2014

Dear Jane,

## **RESPONSE TO BLACKPOOL DRAFT STATEMENT OF COMPLIANCE WITH THE DUTY TO CO-OPERATE**

### **BLACKPOOL LOCAL PLAN PART 1: CORE STRATEGY - PROPOSED SUBMISSION (JUNE 2014)**

Blackpool Council has complied with the guidance set out in the National Planning Policy Framework (the NPPF) *"on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156"* (p37, NPPF). The five strategic priorities comprise: the homes and jobs needed in the area; and the provision of retail, leisure and other commercial development; the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

The three Fylde Coast Authorities (i.e. Blackpool, Wyre and Fylde) have established a Memorandum of Understanding (MoU), so as to assist in meeting the requirements of the Duty to Co-operate and to formalise the ongoing dialogue and co-operation that currently exists for those strategic planning issues which require cross boundary co-operation and collaboration to ensure the requirements of the Duty are met.

Fylde Council agrees that Blackpool Council has worked with the other two authorities of Fylde and Wyre, which make up the Fylde Coast Authorities, in the preparation of joint key evidence base documents.

Fylde Council agrees that ongoing collaboration is taking place between the three Fylde Coast authorities and Lancashire County Council on the preparation of the Fylde Coast Highways and Transport Masterplan.

Fylde Council also agrees that ongoing dialogue is taking place between Blackpool Council (and the other two councils that make up the Fylde Coast Authorities) and the Lancashire Local Economic Partnership (LEP), through the quarterly Duty to Co-operate officer meetings, and through the preparation of the Strategic Economic Plan (SEP). In addition, good progress is being achieved by the Blackpool, Fylde and Wyre Economic Development Company in the preparation of the Fylde Coast Local Growth Accelerator Strategy and Action Plan.

### **Impact on Neighbouring Authorities**

Fylde Council agrees with Blackpool Council at paragraph 3.15 of the Statement of Compliance with the Duty to Co-operate that “there are some cross boundary strategic issues which require continued collaboration and monitoring to demonstrate the legal compliance aspect of the Duty and the soundness aspects of the Duty” and that this is in line with paragraph 182 of the NPPF. To this end, Fylde Council has agreed to accommodate around 14 ha of Blackpool’s unmet employment land requirement through strategic land allocations in the emerging Fylde Local Plan (Part 1).

Fylde Council supports Blackpool Council’s comments in Table A (page 10) that “Blackpool Council will work with Fylde and Wyre Councils in meeting the needs of Travellers and Travelling Showpeople across the Fylde coast sub-region, to ensure the requirements set out in the 2014 GTAA are met through the local plan preparation”.

Fylde Council supports Blackpool Council’s comment in Table A (page 11) that “The Core Strategy supports wider strategic improvements to [the transport] infrastructure in South Blackpool on the Blackpool / Fylde boundary benefiting sub-regional connectivity”.

Fylde Council supports Blackpool Council’s comment in Table A (page 12) that “Ongoing collaboration with neighbouring authorities, LCC, EA and UU to ensure the required water-related infrastructure is delivered”.

Fylde Council supports Blackpool Council’s comment in Table A (page 13) that “Blackpool will be accommodating some of the secondary educational needs of the proposed housing located within that part of the Whyndyke Farm site that lies within Fylde. Collaboration is ongoing to finalise the nature of this contribution”.

Fylde Council supports Blackpool Council’s comment in Table A (page 13) regarding the natural environment: “The importance of land to the south of Blackpool around Whyndyke and Whitehills in Fylde is acknowledged in the HRA as important for foraging Annex 1 bird species”.

### **Level of co-operation**

Fylde Council raises no objection to the level of co-operation undertaken by Blackpool Council, which is set out in the Statement of Compliance with the Duty to Co-operate.

It is considered that the draft Statement of Compliance accurately reflects the engagement that Blackpool Council has undertaken with Fylde Council.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Mark Evans', written in a cursive style.

**Mark Evans**  
**Head of Planning & Regeneration**

## Tracy Shand

---

**From:** Camp, Richard <Richard.Camp@lancashire.gov.uk>  
**Sent:** 28 August 2014 11:43  
**To:** Development Plans  
**Cc:** Hudson, Marcus; Nurser, Louise  
**Subject:** DRAFT STATEMENT OF COMPLIANCE WITH THE DUTY TO CO-OPERATE  
**Attachments:** StatementofComplianceResponse.doc

Further to your email of 4<sup>th</sup> July please find attached comments from Lancashire County Council. If you have any queries then please contact myself in the first instance.

Regards  
Richard Camp

**Richard Camp**  
Planning Officer, Strategy and Policy  
Environment Directorate  
Lancashire County Council  
Preston PR1 0LD  
Tel: 01772 532965

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**Blackpool Local Plan Part 1**  
**Draft Statement of Compliance with the Duty to Cooperate**

Comments from Lancashire County Council. August 2014

This response is sent in the context of our formal agreed working arrangements with Blackpool as part of the Duty to Cooperate working group. Officers who were previously involved in the drafting of the Memorandum of Understanding covering Economic development, transport, flood risk/management and the natural environment have been consulted. Colleagues in education have also been consulted, given the potential for development on the Fylde/Blackpool boundary.

Overall, respondents are content with the Statement of Compliance.

The following comments are made:-

**Table A**

**Infrastructure 5<sup>th</sup> column:**

Need to add reference to Blackpool Airport Infrastructure Planning and Development Liaison Group (reps of Blackpool Airport, Blackpool Council, Fylde BC, Wyre BC, LCC and Fylde Economic Development Company).

**Water related Infrastructure 5<sup>th</sup> Column**

The Statement should have regard to the adopted Joint Lancashire and Blackpool Local Flood Risk Management Strategy. The Strategy was formally adopted by Lancashire County Council on 9 April 2014 following public consultation and subsequent cabinet member sign off. The strategy has also been formally signed off by Blackpool Council's decision making process and is therefore no longer a draft strategy. It holds the equivalent weighting of a Supplementary Planning Document (SPD); it is therefore a material consideration in the planning process. Specifically, the Blackpool Core Strategy should have regard for the Strategy's nineteen objectives that both LCC and Blackpool Council (BC) are committed to delivering and for the potential for partnership working to help deliver these objectives.

The Statement should refer to both Blackpool Council and Lancashire County Council's role as a Lead Local Flood Authority (LLFA) for their respective administrative area. As a LLFA it is recommended that Blackpool Council place emphasis on flooding from "local" sources (surface water, groundwater and flooding from ordinary watercourses) through the planning policy framework. The Flood and Water Management Act 2010 provides a number of new duties and responsibilities for LLFAs, the introduction of which, could impact on future development decisions.

Ms. J. Saleh.  
Head of Development Plans and Projects,  
Blackpool Council,  
PO Box 17,  
Corporation Street,  
Blackpool  
FY1 1LZ

**Please ask for:** David Thow  
**Telephone No.** 01253 887287  
**Email:** [david.thow@wyre.gov.uk](mailto:david.thow@wyre.gov.uk)  
**Our Ref:**  
**Date:** 21 August 2014

Dear Ms. Saleh,

### **Blackpool Local Plan: Draft Statement of Compliance with the Duty to Co-operate**

Thank you for consulting Wyre Council on the Blackpool Draft Statement of Compliance with the Duty to Co-operate. Blackpool Council has complied with the guidance set out in the National Planning Policy Framework on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156.

The three Fylde Coast Authorities (Blackpool, Wyre and Fylde) have established a Memorandum of Understanding (MoU) to assist in meeting the requirements of the Duty to Co-operate and to formalise the ongoing dialogue and co-operation that currently exists for those strategic planning issues which require cross boundary co-operation and collaboration to ensure the requirements of the Duty are met.

Wyre Council agrees that Blackpool Council has worked with the other two authorities of Fylde and Wyre, which make up the Fylde Coast Authorities, in the preparation of joint key evidence base documents. Ongoing collaboration has also taken place between the three Fylde Coast authorities and Lancashire County Council in relation to the preparation of the Fylde Coast Highways and Transport Masterplan.

Wyre Council raises no objection to the level of co-operation undertaken by Blackpool Council, which is set out in the draft Statement of Compliance with the Duty to Co-operate and it is considered that the document accurately reflects the engagement that Blackpool Council has undertaken with Wyre Council.

Some updating may be required to the Statement of Compliance with the Duty to Co-operate, including the incorporation observations contained in the separate letter from Wyre Council regarding the content of the Proposed Submission Blackpool Local Plan.

Yours sincerely



**David Thow**  
**Head of Planning Services**

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**Tracy Shand**

---

**From:** Philip Dagnall [Philip.Dagnall@ribblevalley.gov.uk]  
**Sent:** 18 July 2014 13:41  
**To:** Development Plans  
**Subject:** response to Duty to Co-operate Compliance request

Dear Blackpool Borough Council,

in response to your request regarding this matter I can confirm that we consider that you have complied with the requirements of the Duty to Co operate legislation in relation to your liaison with Ribble Valley over your Part 1 Core Strategy document.

Yours sincerely,

**Phil Dagnall**

**Assistant Planning Officer** | Ribble Valley Borough Council | Council Offices | Church Walk | Clitheroe | BB7 2RA ☎ 01200 414570 | ✉ philip.dagnall@ribblevalley.gov.uk

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Homes &  
Communities  
Agency

Jane Saleh  
Head of Development Plans and Projects  
Blackpool Council  
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Blackpool  
FY1 1LZ  
<mailto:development.plans@blackpool.gov.uk>

29 August 2014

Dear Jane,

**BLACKPOOL LOCAL PLAN PART 1 : CORE STRATEGY PROPOSED  
SUBMISSION JUNE 2014**

**DRAFT STATEMENT OF COMPLIANCE WITH THE DUTY TO CO-  
OPERATE**

I refer to the draft Statement of Compliance prepared by the Council in June 2014, which you kindly forwarded to the HCA for consideration.

We are pleased that the draft document notes both HCA's involvement as a statutory consultee on successive Development Plan Documents, and also the ongoing co-operation between the Council and the Agency in respect of important interventions such as the Rigby Road housing development, together with Town Centre projects including Talbot Gateway and the Leisure Quarter.

As such, we consider that the Council has co-operated with the HCA in compliance with the Duty, and we are comfortable with the strategic issues and evidence of co-operation noted at Table A of the draft Statement of Compliance.

I hope that this is helpful to you, but should you need any further information or clarification at this stage, please do not hesitate to contact Chris Henshall, HCA Area Manager for the Fylde Coast, (0161 200 6154) or Nick Jackson ,Senior Area Manager (0161 200 6125).

Yours sincerely,

**Deborah McLaughlin**  
**Executive Director - North West**

**DUTY TO CO-OPERATE**

**MEMORANDUM OF UNDERSTANDING**

**BETWEEN**

**BLACKPOOL COUNCIL,**

**LANCASHIRE COUNTY COUNCIL,**

**FYLDE BOROUGH COUNCIL AND**

**WYRE BOROUGH COUNCIL**

**August 2013**



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## **1.0 PURPOSE OF THE MEMORANDUM OF UNDERSTANDING**

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

## **2.0 CONTEXT**

- 2.1 The Government has made some significant changes to the planning system that will affect the responsibilities of all local planning authorities. The intention of the changes is to make the planning system one that better supports sustainable economic growth and jobs, underpinned with the principles of localism, with less 'top-down' prescription and more 'bottom up' involvement.
- 2.2 The changes were introduced through the Localism Act which received Royal Assent on 15 November 2011. A key provision of the Act is the abolition of Regional Spatial Strategies, the consequences of which means that local authorities are now responsible for their own strategic planning. The North West Regional Strategy was revoked on 20 May 2013.
- 2.3 With the revocation of Regional Spatial Strategies, to ensure that sensible planning for issues which extend beyond a local authority boundary still happen, the Government has introduced through the Localism Act and the National Planning Policy Framework (NPPF) a 'Duty to Co-operate' on strategic planning issues.

- 2.4 The Duty to Co-operate applies to all local planning authorities, County Councils and a number of other public bodies, in consultation with Local Nature Partnerships and Local Enterprise Partnerships in particular. It requires working with neighbouring authorities and other bodies on strategic priorities and includes collaborating on evidence critical to understanding the needs of local areas and the wider economic and housing market areas.
- 2.5 Strategic cross-boundary needs should be considered in an authority's local plan and authorities will need to demonstrate that they have successfully co-operated with other bodies on cross-boundary issues. If this is not achieved the Government has indicated that authorities run the risk of their Local Plans being found 'unsound' at Examination.
- 2.6 In particular, the new duty:
- relates to sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council;
  - requires that councils set out planning policies to address such issues;
  - requires that councils and other bodies engage constructively, actively and on an ongoing basis to develop strategic policies in the preparation of local plan documents and activities that can reasonably be considered to prepare the way for such documents;
  - requires councils to consider joint approaches to plan-making.
- 2.7 Paragraphs 178 -181 of the NPPF give further guidance on 'planning strategically across local boundaries' and highlights the importance of joint working to meet development requirements that cannot be wholly met within a single local planning area, through either joint planning policies or informal strategies such as infrastructure and investment plans.

### **3.0 THE FYLDE COAST PENINSULA – SUB REGIONAL FUNCTIONALITY**

- 3.1 The Fylde Coast sub-region encompasses the area covered by the unitary authority of Blackpool Council and the two-tier area covered by Lancashire County Council and the district councils of Fylde and Wyre. The area stretches from the Ribble Estuary in the south to Morecambe Bay in the north and the Forest of Bowland moorlands in the east. The area covers 384 sq km and is home to 327,400 residents.
- 3.2 The Fylde Coast sub-region demonstrates a high level of self containment in terms of housing markets, travel to work patterns and economic functionality.
- 3.3 The Fylde Coast housing market area is broadly determined by patterns of local migration and travel to work patterns. There are strong local connections within that part of the Fylde Coast housing market area comprising Blackpool and west Fylde and Wyre. The remaining areas of Wyre relate to a wider rural housing market and eastern Fylde relates more strongly to Preston.

- 3.4 The economic functionality of the Fylde Coast is apparent through the strong travel to work patterns and employment with a shared tourism and cultural offer; regionally and nationally significant advanced manufacturing (BAE Systems at Warton and nuclear processing at Westinghouse, Springfields); the Department for Work and Pensions; and a shared infrastructure including Blackpool International Airport, coastal tramway and strategic highway and rail networks.
- 3.5 This economic coherence was reflected in the establishment of the Multi Area Agreement in April 2009 and the Blackpool, Fylde and Wyre Economic Development Company in April 2010 (rebranded the Blackpool Bay Company in 2011), to support local authority partnership working, co-ordinate and drive forward shared objectives and deliver a co-ordinated programme of capital investment.

## **4.0 CROSS BOUNDARY ISSUES**

### **Context**

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

NPPF, with the presumption being 'yes' to sustainable development unless 'any adverse impacts would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or specific policies in the Framework indicate development should be restricted'. This could result in development being approved which does not have the support of the authorities.

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

## Housing

- 4.9 The housing offer on the Fylde Coast has an important role in supporting the sub-region's economy. The Fylde Coast housing market area (HMA) as a whole offers a wide range of housing and neighbourhoods, including some very attractive areas, but there are also some major concentrations of poor quality homes in very unattractive neighbourhoods. These neighbourhoods contribute to the underperformance of the local economy, whilst in the attractive areas it is difficult for local people on modest incomes to be able to afford to buy or rent a suitable home.
- 4.10 To achieve a more balanced housing market the FCAs have undertaken a joint approach to addressing housing issues unrestricted by local authority boundaries. This has included appointing a Fylde Coast Housing Strategy Manager in October 2007 to develop and manage the sub-regional approach to housing and inform policy development.
- 4.11 Various joint housing studies have been produced to inform policy development, including the need for new and affordable housing:
  - the **Fylde Coast Housing Market Assessment Study 2008** - to provide a robust evidence base to inform the policy approach to be adopted in the individual local

plans. This study is a key document in the Local Plan evidence base and is currently being reviewed to ensure it is appropriate for examination;

- the **Fylde Coast Housing Strategy 2009** - to provide a common understanding, vision and set of priorities for housing across the Fylde Coast housing market area to provide a wider understanding of issues and priorities that enables public and private sector partners to develop their work in a clear strategic context.

4.12 The FCAs have also produced, through the Blackpool Fylde and Wyre Economic Development Company and in association with Lancashire County Council and the Homes and Communities Agency (HCA), a Local Investment Plan (LIP) to help make clear the local objectives and delivery priorities for capital investment in housing and regeneration in support of economic improvement across the Fylde Coast area over the 2011 – 2014 period.

4.13 In considering housing need and requirements, the FCAs also need to address the accommodation requirements of Gypsies, Travellers and travelling showpeople. A Gypsy and Traveller Accommodation Assessment was undertaken by the University of Salford, commissioned by the North West Regional Assembly on behalf of the Lancashire authorities and published in May 2007. This study was in response to obligations and requirements to resolve some of the long standing accommodation issues for members of the Gypsy and Traveller communities.

4.14 Recently both Fylde and Wyre Councils have come under pressure with respect to unauthorised Travellers encampments and importantly the NPPF now requires all local authorities to provide for a 5 year supply of sites where a need is identified. With this requirement the FCAs will need to agree the evidence base and ensure that policies contained within their respective Local Plans address the accommodation needs of Gypsies, Travellers and travelling Showpeople and that the policy approach by each authority is appropriate and complementary across the sub-region.

## **KEY ISSUES**

### **To work together to:**

- **agree the housing provision and strategy approach across the Fylde Coast sub-region;**
- **establish a more balanced and wider housing choice in the HMA, with a focus on family and affordable housing needs which will assist economic uplift in line with priorities established in the Fylde Coast Local Investment Plan;**
- **promote a strong and distinctive sustainable urban extension closely integrated with the surrounding areas on land on the Fylde/Blackpool boundary around Junction 4 of the M55;**

- **provide for the accommodation needs of Gypsy, Traveller and travelling Showpeople communities across the Fylde Coast sub-region;**
- **agree the policy approach for lands in Blackpool/Fylde comprising Marton Moss;**
- **agree complementary/joint approaches to the delivery and accessibility of affordable housing.**

### **Economy – Business and Industrial Development**

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

jointly commissioned in 2013 by Fylde and Blackpool authorities relating to land on the Fylde/Blackpool boundary around Whitehills and Junction 4 of the M55 and specific sites in the south of Blackpool.

- 4.20 A Fylde Coast Economic Strategy is also being developed by the Economic Development Company to support the coordinated development of future employment across the Fylde Coast Sub-Region.

**KEY ISSUES:**

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

**Blackpool Airport corridor – Blackpool/Fylde boundary;**

**The Enterprise Zone at BAE Systems – Warton – Fylde;**

**Land at Thornton – Cleveleys (Hillhouse) – Wyre;**

**Central Business District – Blackpool Town Centre;**

**Whyndyke Farm – Fylde/Blackpool boundary A6 Corridor/Garstang – Wyre**

**Retail**

- 4.21 Retailing is a key strategic issue over which the FCAs collaborate and in September 2007 White Young Green were commissioned by Blackpool, Fylde and Wyre authorities to carry out the first sub-regional retail study for the Fylde Coast. The study, which was published in June 2008, was undertaken to provide an in-depth analysis of the retail provision within the main centres of the Fylde Coast Sub-Region, including an assessment of the extent to which the centres were meeting the retail needs of the local population and the role of the local shopping network and the sub-regional shopping hierarchy.

- 4.22 This 2008 study was recently updated by Roger Tym and Partners – the ‘Joint Fylde Coast Retail Study 2011’ in order to reflect significant changes since the first study. These include major new developments, in particular the extension to the Houndshell Shopping Centre in Blackpool; economic changes; forecast retail expenditure growth rates; and changes in national guidance with respect to the publication of PPS4 (December 2009) and the test of soundness for Local Plan Documents in PPS12 (June 2008), now superseded by the NPPF.
- 4.23 The 2011 study provides evidence to inform the local plans of the FCAs with respect to:
- a. the retail role of towns within the Fylde Coast and their position in the retail hierarchy;
  - b. potential future development needs for each authority; and
  - c. definition of the town centres within the Sub-Region which are Blackpool, Lytham, St Annes, Kirkham, Fleetwood, Cleveleys, Poulton-le-Fylde and Garstang.
- 4.24 The 2011 study has been endorsed by the Executives of each of the FCAs to be used as appropriate evidence base on which to inform policy in their local plans.

**Key recommendations in the Fylde Coast Retail Study 2011 that have strategic implications:**

- that Blackpool, Fylde and Wyre authorities pursue a strategy of increasing the amount of comparison goods expenditure that is spent in the sub-region, from a current level of 75% of total expenditure to 78% in 2021 and 80% in 2026;
- each authorities’ share of the sub-regional floorspace total reflects its current share of retained comparison goods;
- that the role of Blackpool town centre as a strong sub-regional centre, should be restored thereby reducing the unsustainable level of expenditure flowing to out of centre locations within the catchment area, and to competing destinations outside the catchment area;
- restoring Blackpool’s role as a strong sub-regional centre is at the expense of out of centre locations not at the expense of other centres in the Fylde coast sub-region;
- a presumption that there is no need to plan for a net gain in floorspace in out of centre locations. The FCAs should plan to accommodate the indicative levels of floorspace identified in the study on sites located within and on the edge of the identified town centres;
- there is no overall quantitative need for further convenience goods floorspace in the sub region for the period up to 2021.

**KEY ISSUES**

- **The need to work together to provide evidence to effectively resist retail applications which are not in accordance with the development strategies of the FCAs.**

## Transport

- 4.25 Developing a more sustainable and efficient transport network across the Fylde Coast is vital for our economic prosperity and our social and environmental well being. Our sub-regional transport infrastructure needs to support our economic priorities and effectively integrate with future development locations to reduce the need to travel, making it safe and easy for Fylde Coast residents to access jobs and services; for visitors to access and enjoy the tourism and cultural offer; and for business to be attracted to invest in the sub-region.
- 4.26 The transport infrastructure of the Fylde Coast comprises road, rail, tram, air and port links supported by a comprehensive network of footpaths, canal, cycle routes and bridleways.
- 4.27 At the heart of the transport network is the M55 linking Blackpool with the M6 north of Preston. This is supported by the principal road network including the key routes of the A583 (Preston-Kirkham- Blackpool), the A584 (Freckleton/Warton – Lytham St. Annes-Blackpool) and the A585(T) (M55 Junction 3 to Fleetwood).
- 4.28 Main line rail connects Blackpool North via Poulton-le-Fylde and Kirkham with Preston and the South Fylde line links Lytham St. Annes via Kirkham to Preston and Blackpool South. Network Rail’s project to electrify the line from Blackpool north to Preston and on to Manchester will enhance rail services to London and other major UK cities and increase the potential for modal shift to relieve the road network.
- 4.29 The Blackpool Tramway system runs from Starr Gate in south Blackpool to north Fleetwood some 11 miles along the coast, assisting north-south movements. The tramway has seen significant investment with a comprehensive upgrade completed in 2012, providing a modern accessible transport system. In addition through Sintropher funding, work has been undertaken to assess the development of tram services linked to the national rail network. The Blackpool North Tram Extension scheme option proposes a 700m extension from the promenade at North Pier along Talbot Road to Blackpool North rail station. The intention is to create an interchange between the tram and rail, increasing accessibility and connectivity between destinations along the Fylde Coast tramway and the national rail network.
- 4.30 The Fylde Coast also benefits from the presence of an international gateway at Blackpool International Airport located on the Fylde/Blackpool boundary operating regular charter and scheduled flights throughout the UK and to various European destinations. In addition, whilst the Port of Fleetwood ceased ferry services in 2010 it maintains its capacity for ferry RORO and has potential as a maintenance base for the off-shore energy sector, including wind turbines.
- 4.31 Whilst the transport infrastructure for the Fylde Coast could be considered as comprehensive there are major strategic challenges which need to be addressed to improve our economic competitiveness. These include:
- The A585(T) corridor currently suffers from severe congestion at ten junctions. At peak times 70% of all travel to work trips within the Fylde Coast are made by car. This causes serious problems of congestion and traffic noise intensity in

residential areas. The problem of access and connectivity is exacerbated by growing demands of the industrial area of Thornton;

- Congestion on the A585 between the M55 and Fleetwood could undermine future economic development activity of the Fleetwood -Thornton Development Corridor (to which the adopted Fleetwood-Thornton Area Action Plan, is applicable);
- In the south access to the BAE Systems site at Warton needs to be improved to allow redundant brownfield land to be suitable for future development. Such connectivity issues act as a barrier to communities accessing employment. In response to this the Central Lancashire Highways and Transport Masterplan proposes a Western Distributor road around Preston linked to a new Junction 2 on the M55 to accommodate significant housing development in northwest Preston and improve access to the Enterprise Zone site.
- Public transport connectivity within the Fylde Coast area and links outside are poor. Rail links between some of the key urbanised areas and market towns of Wyre and Fylde and the wider North West are poor. The St Annes connection to Preston, for example, is restricted by a single track line with trains only running once every hour in both directions. The propensity of those in the South Fylde rail line catchment area to use rail is well below the national average. There is a real need to increase service frequency and reliability, meeting transport demand from Lytham St Annes and supporting regeneration in Blackpool South. In addition, the tram system is disconnected from the rail infrastructure;
- Blackpool International Airport is a considerable sub-regional asset and there is a need to ensure that the economic potential of this asset is realised. Balfour Beatty, the major stakeholder in the airport is currently developing a new aeronautical masterplan which will set out the growth capacity of the airport and replace the currently adopted 2007 plan. The FCAs therefore need to work closely with Balfour Beatty to ensure the masterplan delivers an outcome that sustains the airport as a major economic asset. Currently public transport access to the airport is relatively poor. There is no rail station and at present no buses directly serve the site. If the airport is to truly appeal as a sub-regional entity, there needs to be investment in transport infrastructure to the site from not only across the Fylde Coast but also from places such as Preston.

4.32 The Lancashire and Blackpool Local Transport Plans will play an important part in addressing these strategic challenges. As part of the Lancashire LTP, the Fylde and Wyre Highways and Transport Master Plan will consider many of these challenges and how they can be met. Close coordination with the Blackpool LTP will be necessary to ensure the successful delivery of the Master Plan.

#### **KEY ISSUES:**

- **Continue to support improvements to the A585(T) to relieve short to medium term road congestion along that route and within the Blackpool urban area and improve the transport of freight.**
- **Continue to safeguard land for the M55 to Norcross Link to relieve longer term road congestion.**
- **Support the sustainable development of Blackpool Airport as an economic priority for the Fylde Coast sub region including improvements to surface access by public transport.**
- **Continue to support improvements to Preston Station and improved accessibility to the Fylde Coast towns.**
- **Continue to safeguard the Poulton to Fleetwood rail line to support the Fleetwood -Thornton Development Corridor and the Port of Fleetwood.**
- **Support further improvements to the tram network to assist north-south movements along the coast from Fleetwood to Starr Gate; to support links to Talbot Gateway and Blackpool International Airport; and to integrate the tramway with other modes of transport including the potential of the South Fylde rail link.**
- **To continue to support the M55 to Heyhouses road link.**
- **Support proposals in the Central Lancashire Highways and Transport Masterplan that will have a material benefit for the Fylde Coast;**
- **Seek a common approach to parking standards across the sub-region.**

#### **Surface Water Drainage and Waste Water**

- 4.33 Water infrastructure capacity is a key cross boundary issue which will directly affect the delivery of built development across the Fylde Coast. The main issues relate to surface water drainage; the capacity of the existing sewage network and the need to ensure that proposals for new development have no adverse effect on the bathing water quality along the Fylde Coast. This is a vital issue as the quality of our beaches and bathing water underpins our tourism offer and our future economic prosperity.
- 4.34 Recent studies have been undertaken to inform the evidence base including the Central Lancashire and Blackpool Outline Water Cycle Study completed in April 2011. Whilst this study covers those authorities in Central Lancashire and Blackpool which were included in the Growth Point area, the study provides an assessment of the flood risk planning data, foul drainage, surface water management water resources and infrastructure issues including information on the wider Fylde Coast area. In addition, as part of its role as a Lead Local Flood Authority, Blackpool is currently producing a Blackpool Surface Water Management Plan researching and aligning all data, information and legislation, in liaison with United Utilities and the Environment Agency on critical capacity issues, with a focus on existing assets, identifying flood risks, mitigation measures, and developing an on-going implementation plan. It includes wider consideration of cross-boundary surface water infrastructure and drainage issues along the coastal belt in order to generate and develop sustainable drainage measures. Lancashire County Council is the Lead

Flood Authority for the Fylde and Wyre area and is currently producing the Lancashire Flood Risk Management strategy which will also include the Blackpool area. As part of this work the County Council is working closely with the FCAs to identify and address key flood risk management issues.

- 4.35 From the evidence base it is clear that the main cross boundary issues relate to network capacity issues which are contributing to surface water flooding and spills of untreated waste water into the Irish Sea, putting at risk Fylde Coast bathing waters under the new bathing water legislation due to come into force in 2015.
- 4.36 It is therefore imperative that the FCAs and LCC agree a supportive approach to surface water and waste water management to ensure that the economic prosperity of the Fylde Coast is not compromised and that the future development requirements of the sub-region can be accommodated. This includes the approach to ad hoc development not compromising the delivery of required infrastructure improvements to address the capacity issues of the Fylde Coast.
- 4.37 In recognition of the issues surrounding water management a Fylde Peninsula Water Management Group was set up in April 2011. This group is a partnership comprising the Environment Agency, United Utilities, the FCAs, Lancashire County Council and Keep Britain Tidy. The purpose of the group is to provide a sustainable and integrated approach to the management of coastal protection; water quality (including bathing waters), surface water drainage (including flooding) and development.

#### **KEY ISSUES**

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

#### **Natural Environment**

- 4.38 The Fylde Coast is characterised by a wide variety of natural environmental assets. There is a range of overlapping designations including sites of international and local habitat importance. Five European sites are focussed upon two areas of Morecambe Bay (including Ramsar, Special Protection Areas and Special Areas of Conservation) and the Ribble and Alt Estuaries (Ramsar and Special Protection Area). In addition, there is a candidate Special Area of Conservation offshore reaching from Blackpool to Cleveleys (Shell Flat and Lune Deep). These designations seek to conserve natural habitats and/or species, important wetlands and birds. The nationally designated Sites of Special Scientific Interest (SSSIs) include Morecambe Bay, the River Wyre and part of the Forest of Bowland Area of Outstanding Natural Beauty. There are also locally important Biological Heritage Sites (BHSs) and pockets of ancient

woodland. In addition, the Morecambe Bay Nature Improvement Area (NIA) was one of twelve designated in 2012, with the aim of improving the landscape for nature, the community and visitors. There are also proposals for the designation of two Marine Conservation Areas covering the Wyre-Lune and Fylde Offshore areas.

- 4.39 The sub-region is also characterised by relatively small but strategically important areas of Green Belt between i) Fleetwood, Thornton and Cleveleys ii) Thornton, Cleveleys, Poulton-le-Fylde and Blackpool iii) Blackpool and St Annes and iv) Lytham and Warton. Any substantial strategic changes to Green Belt boundaries would need to be undertaken as part of a holistic sub-regional review and there is not currently any evidence of a requirement for such a review to take place.
- 4.40 A core planning principle of the National Planning Policy Framework relates to conserving and enhancing the natural environment. This should be considered at a strategic level as networks of biodiversity and green infrastructure cross administrative boundaries and development in one area can have a potential effect upon natural assets in another. Green infrastructure is defined by Natural England as a strategically planned and delivered network comprising the broadest range of high quality green spaces and other environmental features.
- 4.41 Under Article 6 of the Habitats Directive and Regulation 61 of the Habitats Regulations an assessment is required where a plan or project may give rise to significant effects upon a European designated site as outlined above. This will include each authority's local plan, as well as Local Transport Plans, the plans and projects of infrastructure providers and planning applications such as for sea defences or renewable energy. There are several stages in a Habitats Assessment with initial scoping followed by Appropriate Assessment, where the project or plan would have a significant effect. Assessment requires the effects of plans and projects of neighbouring authorities to be considered, so requiring co-ordination and sharing of information at the Fylde sub-regional level.

#### **KEY ISSUES**

##### **To work together to:**

- **conserve and enhance natural habitats, biodiversity and landscapes of importance; and**
- **develop a strategic network of green infrastructure.**

## 5.0 GOVERNANCE

- 5.1 The Duty to Co-operate requires that councils engage constructively, actively and on an ongoing basis. There is therefore a need to establish governance arrangements and protocols to ensure that the requirements of the Duty to Co-operate are met and that the FCAs can demonstrate at examination of their Local Plans that appropriate and constructive co-operation has taken place to ensure sustainable outcomes to strategic planning issues.
- 5.2 It is initially proposed that:
- **a Joint Member and Officer Advisory Steering Group is established to oversee the work under the Duty to Co-operate. The group will be chaired on a rotational basis by a Member of one of the four authorities. The Council Leaders and Chief Executives will have the remit to appoint up to two appropriate representative to act on their behalf as necessary. A key remit of the group will be to resolve difficult and sensitive issues, reaching common understandings;**
  - **an Officer Working Group will provide support to all joint working arrangements as appropriate and on request.**
  - **Governance meetings as detailed above will take place as and when required. All meetings will be minuted to provide ongoing evidence of co-operation;**
  - **Under the Duty to Co-operate the FCAs and LCC will commit to constructive engagement, good communications and transparency, seeking innovative sustainable solutions to strategic issues to ensure the environmental, social and economic prosperity of the Fylde Coast sub-region;**
  - **Where appropriate and necessary a joint evidence base will be developed to inform the policy development on strategic issues.**