

BLACKPOOL LOCAL PLAN CORE STRATEGY Examination

*Malcolm Rivett BA (Hons) MSc MRTPI – Inspector
Tony Blackburn – Programme Officer*

MATTERS AND QUESTIONS

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

(Policy NPPF1)

Participants: Blackpool BC; Home Builders Federation

- 1.1 Has the Council satisfactorily discharged its Duty to Co-operate in preparing the plan and does the strategy adequately take account of and respond to the plans, strategies and needs of neighbouring authorities? Is this adequately documented? In particular:
 - (a) Is the August 2013 Memorandum of Understanding between Blackpool, Fylde, Wyre and Lancashire County Councils up to date and still formally agreed?
 - (b) In the context of a jointly prepared SHMA for the Fylde Coast is there an obligation on Blackpool to ensure that the minimum indicated figure for objectively assessed housing need in the Fylde Coast area as a whole is met, notwithstanding statements from the partner authorities that they do not need to rely on Blackpool to help meet their housing needs?
 - (c) Do the Core Strategy proposals in respect of new comparison shopping floorspace in Blackpool appropriately align with the evidence concerning the Fylde Coast as a whole? (see also Matter 4)
 - (d) Do the Core Strategy proposals in respect of South Blackpool Growth and Enhancement appropriately align with, but not prejudge, those emerging in Fylde and Wyre boroughs? (see also Matter 8)
- 1.2 Does the plan adequately provide for mitigation against significant adverse environmental, social and economic effects and is this adequately and accurately addressed in the Habitats Regulations Assessment and the Sustainability Appraisal (SA)? In particular:
 - (a) Should the SA consider the full range of figures indicated in the SHMA as the objectively assessed need for housing?
 - (b) Is the HRA Screening Assessment of the Core Strategy satisfactory in respect of Marton Moss?
 - (c) Is the HRA Screening Assessment clear that the Proposed Submission Core Strategy is unlikely to give rise to

significant effects on Natura 2000 sites and thus Appropriate Assessment is not necessary?

- 1.3 Is it appropriate for the plan to take the form of a Core Strategy and to devolve key matters, including site allocations, to a future Site Allocations and Development Management Policies document? Is there a clear justification for this and does it accord with national policy?
- 1.4 Is the plan period (2012 – 2027) soundly based and does it accord with national policy? Should the plan period be extended to 2030 to align with housing forecasts and to allow for a 15 year post-adoption life span?
- 1.5 Has the preparation of the plan empowered local people to shape their surroundings and does it set out a positive vision for the future of the area? Has the plan been derived from an open and transparent process which demonstrates how and why its strategy was selected, in consultation with the public and other stakeholders, in preference to the identified alternative options? Is the plan compliant with:
 - (a) the Local Development Scheme?
 - (b) the Statement of Community Involvement?
 - (c) the Public Sector Equality Duty?
 - (d) the 2004 Act and the 2012 Regulations?
- 1.6 Do the plan's policies logically flow from Vision and the Strategic Objectives and those in turn from the Spatial Portrait of Blackpool and the Summary of Overarching Issues?
- 1.7 Are the Vision and the Strategic Objectives clear, realistic and in accordance with national policy and do they adequately reflect the Blackpool Sustainable Community Strategy?
- 1.8 Is a Glossary of Terms necessary to the soundness of the plan?
- 1.9 Are adequate provisions in place to ensure satisfactory monitoring of the plan's effectiveness?

Matter 2 – Housing, Health and Education

(Policies CS1, CS2, CS12, CS13, CS14, CS15, CS16)

Participants: Blackpool BC; Home Builders Federation

2a Objectively Assessed Need for Housing

- 2.1 Is the objectively assessed need for new housing in Blackpool, identified in the Feb 2014 Fylde Coast SHMA as lying within the range of 250 – 400 dwellings per annum (2011-2030), soundly based?
- 2.2 Within the 250-400 dpa range is the figure of 280 dpa as the identified objectively assessed need for new housing (2012-2027) in Blackpool soundly based? And in particular is it appropriate:
 - (a) to base the assessment primarily on an employment-led forecast of new dwelling requirements?
 - (b) to give greater weight to the Oxford Economics forecasts of jobs growth than to the Experian forecasts?
 - (c) to assume that household formation rates captured in trend based forecasts were not constrained by under supply of housing in past years?
 - (d) that the figure is predicated on not seeking to provide for a continuation of the past trend of in-migration of housing benefit claimants?
 - (e) that the figure is predicated on a reduction in the number of jobs in Blackpool, albeit reducing at a lower rate that has occurred in recent years? And is this compatible with the strategy for employment land, based on a continuation of historic land take-up? (see also Matter 3)
 - (f) that the figure is towards the bottom of the 250 – 400 dpa range indicated in the SHMA?
 - (g) that the figure is substantially less than the 444 dpa figure set in the revoked RS?
 - (h) that the figure would be very unlikely to result in the identified need for affordable homes being met? And does the 280 dpa figure take appropriate account of market signals?
- 2.3 In determining the objectively assessed housing need what weight should be given to the SHMA sensitivity testing of an improved economic activity rate in Blackpool?
- 2.4 What are the implications of the 2012-based ONS Population Projections and the 2012-based DCLG Household Projections (anticipated to be published in February 2015) for the objectively assessed housing need in Blackpool?

2b The Housing Target and Trajectory

- 2.5 Is 280 dwellings per annum (dpa) a soundly based figure for the housing target for Blackpool? Would it significantly boost housing supply and be aspirational yet realistic?

- 2.6 In relation to the housing target should policy CS2 refer to "delivery of around x new homes", "delivery of x new homes" or "delivery of at least x new homes"? (See MM05)
- 2.7 Is there robust evidence indicating that the 280 dpa target can be delivered?
- 2.8 Is there compelling evidence that windfall sites will continue to provide a reliable source of housing land supply, sufficient to provide 1400 homes over the plan period?
- 2.9 Is a phased approach to the delivery of new housing soundly based and consistent with national policy?
- 2.10 If a phased approach to delivery is appropriate should it be more closely aligned with the Amion Consulting (May 2014) report analysis of dwelling requirements by five year periods?
- 2.11 Is the 30% buffer of SHLAA sites sufficient to address the challenging nature of some potential sites in inner areas? Or does it indicate the need to allocate additional less-challenging sites?
- 2.12 Should greater emphasis in the plan be given to the provision of "aspirational" family housing?

2c Five Year Supply of Housing

- 2.13 Do the SHLAA and five year housing supply calculation (Housing Requirement Technical Paper, June 2014) provide a realistic forecast of the supply of deliverable housing land in the next five years?
- 2.14 Does the five year supply calculation take appropriate account of likely demolitions other than at Queens Park?
- 2.15 Is it appropriate to seek to address the undersupply from 2012/13 across the rest of the plan period as opposed to in the next five years?
- 2.16 In addition to the sites identified in the SHLAA, and windfall sites, are there other sites which could realistically deliver housing in the next five years if it were to be determined that the phased approach to housing delivery is inappropriate and/or the Housing Requirement Technical Paper (June 2014) does not convincingly demonstrate that there is a five year supply of deliverable housing land?

2d Strengthening community well-being, including affordable housing, housing mix and standards and meeting the housing needs of older people, those with special needs and gypsies and travellers

- 2.17 Are the affordable housing requirements of policy CS14 realistic, deliverable and supported by up to date evidence, including in relation to viability? (see also Matter 9) Will the plan deliver the affordable housing which is required in the Borough?
- 2.18 Does policy CS14 accord with statements in DCLG's Planning Practice Guidance concerning the threshold for requiring affordable housing?
- 2.19 Does the plan adequately provide for the housing needs of older people and those with special needs?

- 2.20 Does the plan adequately provide for the housing needs of gypsies, travellers and travelling show people?
- a) In the light of the Sept 2014 Fylde Coast Gypsy and Traveller and Travelling Showpeople Accommodation Assessment Final Report is it appropriate to set the target for sites to meet their needs in the Site Allocations and Development Management Policies Local Plan Document rather than in the Core Strategy?
 - b) Is there evidence that there is sufficient land to provide for the plan period extra pitch requirements in Blackpool as identified in the Sept 2014 Report?
- 2.21 Are policies CS10 (1c) and CS13 (2) compatible with the Government's stated intention of a Building Regulations only approach to setting a range of standards for new housing? Is policy CS13 (2) and its supporting text sufficiently clear about the standards which will be required?
- 2.22 Does policy CS13 provide sufficient flexibility concerning the mix of house types and sizes?

2e Other Housing Matters

- 2.23 Does policy CS1 adequately and appropriately address the strategic location of all development in Blackpool? Should it also cover the type of development which will be supported/encouraged outside of the Town Centre, Resort Core, Inner Areas and South Blackpool?
- 2.24 Does policy CS12 adequately address the heritage value of inner area neighbourhoods?

Matter 3 – Economic Development and Employment Land

(Policy CS1, CS3)

Participants: Blackpool BC

- 3.1 Is the plan positively prepared, aspirational but realistic in respect of the local economy?
- 3.2 Does the plan provide for sufficient land to meet economic development needs during the plan period and is this supported by robust evidence?
- 3.3 Is the strategy for employment land (based on a continuation of historic land take-up) compatible with that for new housing (based on the Oxford Economics scenario of a small decline in employment)? (see also Matter 2)
- 3.4 What certainty is there that the forecast shortfall of around 14ha of employment land in Blackpool will be provided for in Fylde Borough?
- 3.5 Does policy CS3 provide sufficient flexibility in respect of safeguarded employment sites where it can be demonstrated that there is no reasonable prospect of the site being used for employment purposes? Is the policy consistent with paragraphs 22 and 51 of the NPPF?
- 3.6 Is the safeguarding through policy CS3/CS24 of the NS&I site at Mythop Road as a location for employment use soundly based? Is there evidence of likely demand for the site for employment use during the plan period? Would the site be more appropriately designated for a mix of residential (policy CS25) and employment use? (see also Matter 8)

**Matter 4 – Retail and Town Centre Uses (including Blackpool Town Centre, Winter Gardens, Central Business District and Leisure Quarter)
(Policies CS1, CS4, CS17, CS18, CS19, CS20)**

Participants: Blackpool BC; Blackpool Pleasure Beach

- 4.1 Is the plan positively prepared, aspirational but realistic in respect of retail development and town centre uses?
- 4.2 Is the statement in paragraph 5.52 that there is capacity for 16,390 sq m of additional comparison goods floorspace in Blackpool Town Centre supported by up to date evidence? Is the 2013 Update of the 2011 Fylde Coast Retail Study of relevance to the plan?
- 4.3 Is there potential conflict between policy CS4, which states that town centre uses will be permitted outside centres only if the listed criteria (a) – (d) are met and policy CS21 which states that tourism attractions will be supported in the Town Centre and Resort Core? Should the policies or their supporting text be modified to give clearer guidance on the type of main town centre uses which will be permitted outside of the Town Centre but within the Resort Core? (see also Matter 7)
- 4.4 Is MM025 (replacing “exploiting” in policy CS17 1c with “protecting and enhancing”) necessary to soundness?
- 4.5 Are policies CS17 and CS18 sufficiently clear about the type of retail development which would be supported in the Winter Gardens? And is a strategy promoting retail development in the building (other than that ancillary to other uses) soundly based?
- 4.6 Does policy CS18 provide a positive strategy for the conservation and enjoyment of the Winter Gardens? Should the policy specifically refer to the “conservation and enhancement” of the building? (EH)
- 4.7 Is it appropriate and necessary to soundness for policy CS18 to require that developments will be financially self-sustaining and that income generated should be used to maintain and enhance the heritage asset?
- 4.8 Is reference to “theatres” and “maintenance of existing venues” necessary to the soundness of policy CS18 (see MM029)? If so would “retention” be a more appropriate word than “maintenance”?
- 4.9 Does the plan provide adequate guidance on the “evening economy”?
- 4.10 Is policy CS19 (2b), which supports a major foodstore in the Central Business District, compatible with the statement in paragraph 5.53 that there is no overall need for further convenience goods floorspace in Blackpool to 2021 and very limited capacity to 2026?
- 4.11 Is it appropriate and necessary to the soundness of the plan for policy CS20 to state that major comparison retailing or amusement park development will not be permitted in the Leisure Quarter?

Matter 5 – Transport, Green Infrastructure, Water Management and Sustainable Design and Renewable/Low Carbon Energy (Policies CS5, CS6, CS9, CS10)

Participants: Blackpool BC; Blackpool Pleasure Beach; Home Builders Federation

- 5.1 Is specific reference in policy CS5, or its supporting text, to a recognition that for some development there may be no alternative to car use, necessary to the soundness of the plan?
- 5.2 Should policy CS5 (5) be limited to town centre parking? Does the policy, or the plan elsewhere, adequately address visitor parking outside of the town centre?
- 5.3 Is specific reference to protection for ancient and veteran trees in policy CS6 necessary to the soundness of the plan?
- 5.4 Is it necessary for the plan to set a target for the creation of new woodland?
- 5.5 Should policy CS6 (or policy CS25 or the Core Strategy more generally) set out additional detailed requirements in respect of development at South Blackpool and the protection of Natura 2000 sites from recreational pressure? (see also Matter 1 and Matter 8)
- 5.6 It is necessary/appropriate for policy CS6 to state that, subject to mitigation measures, development will be permitted adjacent to designated sites?
- 5.7 Is policy CS6 inappropriately restrictive in terms of resisting the loss of open space, sports and recreational buildings? Does the policy in respect of open space, sports and recreational buildings accord with national policy? Is the evidence base supporting the policy robust and up-to-date?
- 5.8 Is the designation of the Preston New Road, former Co-op Sports Club and Fields site for residential development a matter for the Core Strategy or for the Site Allocations document?
- 5.9 Is United Utilities' suggested modifications to policy CS9 (1e) and its supporting text necessary to the soundness of the plan?
- 5.10 Is MM016 necessary to the soundness of policy CS9?
- 5.11 Are the requirements of policy CS10 consistent with the intentions of Government for there to be a Building Regulations only approach to addressing a range of standards in relation to residential development?

Matter 6 – Quality of Design and Heritage

(Policies CS7, CS8)

Participants: Blackpool BC

- 6.1 Is reference to the natural environment, biodiversity and ecological networks in policy CS7 necessary to the soundness of the plan?
- 6.2 Is the plan based on adequate, up-to-date evidence about the historic environment, in line with paragraph 169 of the NPPF?
- 6.3 Does the plan provide a positive strategy for the conservation and enjoyment of the historic environment in line with paragraph 126 of the NPPF?
- 6.4 Do Chapters 2 and 3 of the plan underplay the value of the town's historic environment and is a more detailed, evidence-based assessment of, and vision/goals for, the historic environment necessary to the soundness of the plan?
- 6.5 Is policy CS8 appropriate as a Core Strategy policy? Should it more specifically refer to Blackpool's particular historic heritage features or is that the role of Development Management policies?
- 6.6 Is it sufficiently clear how policy CS8 will be applied in the light of the emerging Built Heritage Strategy?
- 6.7 Are the detailed wording changes proposed in MM012, MM013 and MM020 appropriate and necessary to the soundness of the plan?
- 6.8 Is policy CS8 (5) (even as proposed to be modified by MM014) effective? Should the policy's clauses (1) – (4) be modified to take account of/refer to the local heritage assets?
- 6.9 Does the plan provide adequate guidance on the role and the conservation/enhancement of the Tower and the piers?
- 6.10 Is reference to the historic environment in other policies of the plan necessary to its soundness – in particular CS6, CS10, CS11, CS12, CS16 and CS21?

Matter 7 – Blackpool Resort Core

(Policies CS1, CS21, CS22, CS23)

Participants: Blackpool BC; Blackpool Pleasure Beach; Chadsley Hotel; Memphis Hotel

- 7.1 Is the plan positively prepared, aspirational but realistic in terms of tourism accommodation and facilities?
- 7.2 Is the strategy of seeking to focus new tourism accommodation and facilities within the Resort Core/Town Centre soundly based and supported by relevant evidence?
- 7.3 Is there potential conflict between policy CS4, which states that town centre uses will be permitted outside centres only if the criteria (a) – (d) are met and policy CS21 which states that tourism attractions will be supported in the town centre and resort core? Should the policies or their supporting text be modified to give clearer guidance on the type of main town centre uses which will be permitted outside of the Town Centre but within the Resort Core? (see also Matter 4)
- 7.4 Does policy CS21 (2) provide sufficient support for enhancement/expansion of existing tourism facilities outside of the Resort Core/Town Centre?
- 7.5 Is it appropriate for the main holiday accommodation areas against which policy CS23 would be applied to be set out in the Holiday Accommodation SPD (which is not subject to independent examination) as opposed to in a Local Plan document? If so should these areas be set out in the Core Strategy or the Site Allocations document?
- 7.6 Are the main holiday accommodation areas appropriately defined having particular regard to Palatine Road?
- 7.7 Should the part of paragraph 7.39 concerning car parking be included in policy CS22 itself? Would the policy as currently worded enable refusal of a development on an existing car park which would undermine the resort's ability to accommodate visitor trips? (see also Matter 5)

Matter 8 – South Blackpool Growth and Enhancement

(Policies CS1, CS24, CS25, CS26, CS27)

Participants: Blackpool BC

- 8.1 Do the Core Strategy proposals in respect of South Blackpool Growth and Enhancement appropriately align with, but not prejudice, those emerging in Fylde and Wyre boroughs? (see also Matter 1)
- 8.2 Is the safeguarding through policies CS3/CS24 of the NS&I site at Mythop Road as a location for employment use soundly based? Is there evidence of likely demand for the site for employment use during the plan period? Would the site be more appropriately designated for a mix of residential (policy CS25) and employment use? (see also Matter 8)
- 8.3 Should policy CS25 (2) refer to the impact on surface and waste water networks being “most appropriately managed”. Is MM031 necessary to the soundness of the plan?
- 8.4 Should policy CS6 (or policy CS25 or the Core Strategy more generally) set out additional detailed requirements in respect of development at South Blackpool and the protection of Natura 2000 sites from recreational pressure? (see also Matter 1 and Matter 5)
- 8.5 Is policy CS26 inappropriately restrictive, bearing in mind the time likely to be necessary to get a Neighbourhood Plan in place? Does it accord with paragraph 55 of the NPPF? Should it permit additional new development on disused land with a highway frontage? Is MM032 necessary to the soundness of the plan?

Matter 9 – Implementation, Monitoring and Viability

(All policies and Appendix C: Monitoring and Implementation Plan)

Participants: Blackpool BC

- 9.1 Does policy CS11 adequately cover local infrastructure provision or is modification of the policy (or an additional policy) necessary to the soundness of the plan?
- 9.2 Has the likely cumulative impact of the plan’s policies and standards, together with other local and nationally required standards, been adequately considered using appropriate available evidence? Does this indicate that the plan’s policies and standards would not put implementation of the plan at serious risk and would facilitate development throughout the economic cycle?
- 9.3 Does Appendix C (The Monitoring and Implementation Plan) provide a sound basis for monitoring implementation of the Core Strategy and for taking appropriate action if implementation is not on track?