

## **Blackpool Local Plan Part 2: Site Allocations and Development Management Policies**

**Matter 1: Is the SADMP legally compliant, have the relevant procedural requirements been met, and has the Duty to Co-operate (DtC) been complied with?**

**Blackpool Council Statement**

November 2021

**Blackpool Council**

The logo graphic consists of two horizontal, wavy lines in a light blue-grey color, positioned below the text 'Blackpool Council'.

## Introduction

This Statement has been produced by Blackpool Council to outline its response to the Matters, Issues and Questions raised by the Inspector for the Hearings into the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Document (SADMP) ([SD001](#)).

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

The Council also wishes to respond and engage constructively with the Inspector and in the Council report of February 2021 the Council formally requested, pursuant to Section 20 (7c) of the 2004 Act, that the Inspector recommends any necessary modifications to the Plan to make the Plan satisfy the appropriate requirements and soundness.

## References:

- [SADMP – SD001](#)
- [Policies Maps SD002 and SD003](#)
- [Duty to Cooperate Statement of Common Ground \(SoCG\) – DC001](#)
- [Blackpool Local Plan Part 1: Core Strategy \(adopted January 2016\) \(AD004\)](#)
- [Blackpool Airport Enterprise Zone Masterplan \(EL1.002d and EL1.002e\)](#)
- [Blackpool, Fylde and Wyre Gypsy and Traveller Accommodation Assessment Update \(October 2016\) \(EB008\)](#)
- SADMP Sustainability Appraisal (SA) and Strategic Environmental Assessment - [SD005](#) and [SD005a](#)
- [Final SA Scoping 270317](#)
- [SoCG between Blackpool Council and Natural England – EL1.004c](#)
- [SA Report Update November 2020](#)
- [SADMP Regulation 18 Scoping Document \(2017\) \(AD002\)](#)
- [SADMP Informal Consultation Document \(2019\) \(AD001\)](#)
- [SADMP Summary of Representations \(SD009\)](#)
- [SADMP Consultation Statement \(SD011\)](#)
- [Statement of Community Involvement \(SD012\)](#)
- [Local Development Scheme \(SD013\)](#)

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## **Matter 1: Is the SADMP legally compliant, have the relevant procedural requirements been met, and has the Duty to Co-operate (DtC) been complied with?**

### Position of the Council regarding Matter 1

#### **Issue (i): Has the DtC been complied with?**

#### Questions:

##### **1. Has the Council engaged constructively and on an ongoing basis with all relevant organisations on any strategic matters in accordance with the DtC?**

1.1 The Council considers that it has engaged constructively and on an ongoing basis with all relevant organisations on relevant strategic and cross boundary matters and has complied with the Duty to Co-operate in full accordance with section 110 of the Localism Act (2011) and met the objectives contained within paragraphs 24 to 27 of the National Planning Policy Framework (NPPF21) and the Town and Country Planning (Local Planning (England) Regulations 2012 (as amended).

1.2 The Council's Duty to Cooperate Statement of Common Ground (SoCG) ([DC001](#)) sets out an overview of the co-operation and joint working that the Council has undertaken. The Local Plan Part 2 (from this point referred to as the SADMP) has been prepared through constructive, active and ongoing engagement with Fylde and Wyre Borough Councils and Lancashire County Council (LCC) and prescribed bodies.

1.3 Section one of the SoCG (pages 7 to 17) provides information on context; governance arrangements; strategic matters; a narrative on the continuous cooperation and collaboration that has been undertaken; and joint evidence which has been prepared with neighbouring authorities.

1.4 The cooperation and collaboration with Blackpool Council and its neighbouring authorities of Fylde and Wyre and LCC (upper tier authority for Fylde and Wyre Councils) has been ongoing since 2012 and has been guided by a Memorandum of Understanding which was original adopted by all 4 authorities in 2013 and updated in 2015 (document [DC001](#) Appendix A refers).

1.5 Regular quarterly meetings under the Fylde Coast Duty to Co-Operate banner are held between officers from the Fylde Coast Authorities and LCC, where strategic planning

issues are discussed and agreed. The Lancashire Enterprise Partnership (LEP) and representatives of LCC and Blackpool Council transport authorities are also invited to attend these meetings.

1.6 The Duty to Co-operate meetings have been an effective mechanism for ensuring that strategic planning issues that cross council administrative boundaries between the Fylde Coast Authorities are given due consideration, are planned for and are delivered effectively through the plan making process. Paragraphs 1.31 to 1.41 of the SoCG set out the cooperation and ongoing collaboration that has taken place during the preparation of the SADMP and is summarised in Table 1.1 (SoCG page 15).

1.7 Paragraphs 1.15 and 1.16 of the SoCG highlights that cross boundary strategic issues have primarily been addressed through the preparation of the Core Strategy and a Statement of Compliance (SoC) was submitted with the Core Strategy and accompanies the SoCG at Appendix B which includes the Fylde Coast Authorities MOU (2013 version) ([DC001](#) refers).

1.8 Since the adoption of the [Core Strategy](#) in 2016, Blackpool Council has continued to engage with neighbouring authorities and other bodies to ensure that the strategic and cross boundary issues set out in the SoC and MoU continue to be taken into account where appropriate in the development of the policy framework in the SADMP.

1.9 Paragraph 1.30 of the SoCG highlights those strategic matters that have been considered in developing policy in the SADMP they are reflected in Section 3 Table A of the SoCG (page 22) documenting with whom the Council has collaborated on what strategic priorities and the outcome of the collaboration.

1.10 Section 2 of the SoCG (page 18) highlights the cooperation and collaboration that has been undertaken with prescribed bodies and this is also reflected in Table A in Section 3 of the SoCG.

1.11 A draft of the SoCG was subject to consultation at the time of the SADMP Publication Version (Proposed Submission) Regulation 19 consultation ([SD001](#) refers) to allow neighbouring authorities and prescribed bodies to make further comment on the draft SoCG before it was finalised and signed by the plan-making authorities.

## 2. How does the SADMP address any cross-boundary issues that have emerged as a result of engagement with prescribed bodies?

2.1 Section 3 Table A of the SoCG ([DC001](#) refers) summarises how Blackpool Council engaged with prescribed bodies. The table highlights the strategic priority and the nature of the strategic issue that has been considered relevant; who has cooperated; how this cooperation has been undertaken; and what evidence has informed the cooperation. The outcome of this cooperation is set out in the 'Outcomes' column of Table A summarising the result of the cooperation and highlighting any amendments that have been made to the SADMP.

2.2 In relation to the prescribed bodies engagement the nature of the issues raised by these bodies has not required any significant changes to the policies and proposals in the SADMP.

2.3 The bullet points below summarise how the SADMP has addressed, where appropriate the issues raised by those prescribed bodies who responded:

- **Highways England (HE)** - In response to representations received from HE dated 3 April 2020 and 25 September 2020 additional wording has been inserted in Policy DM8 Blackpool Airport Enterprise Zone at point 6 to include a reference to Highways England to recognise their role in assessing the impact of development at the Enterprise Zone on the Strategic Road Network in the south of the Borough. This is highlighted in Section 3 Table A under **Strategic Priority 1: Homes and Jobs b) Blackpool Airport Enterprise Zone (EZ)** (page 24 refers) and **Strategic Priority 3: Infrastructure a) Transport** (page 29 refers).

No further issues were raised in HE's representation (letter dated 23 February 2021) to the draft DtC SoCG at the Regulation 19 Consultation as summarised in the DtC SoCG Schedule of Representations (February to April 2021).<sup>1</sup>

- **Environment Agency's (EA)** - In response to EA's representation to the informal consultation of the SADMP in 2019<sup>2</sup>, which raised issues over surface water drainage, Policy DM31 was introduced and this is highlighted in the DtC SoCG under **Strategic Priority 3 Infrastructure b) Water-related Infrastructure** (page 31 refers).

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<sup>1</sup> Submitted to the Examination Library - DtC SoCG Schedule of Representations (February to April 2021)

<sup>2</sup> Blackpool Local Plan Part 2: Site Allocations and Development Management Policies - Consultation Statement December 2020 page 211 refers

EA's further representation to the Regulation 19 Publication in relation to the DtC SoCG dated 1 April 2021 raised no further issues that needed to be addressed in the SADMP (DtC SoCG Schedule of Representations (February to April 2021 refers)).

- **Marine Management Organisation (MMO)** - In response to the correspondence received from the MMO between March 2020 and April 2021 no strategic issues were raised that required to be addressed in SADMP. Issues raised by MMO were related to textual amendments to the SoCG as opposed to the need for any change to the policies and proposals in the SADMP.
- **Historic England (HE)** – HE's representation to the DtC SoCG dated 26 March 2020 confirmed that they did not consider that there are any strategic cross-boundary matters in relation to the historic environment at the time of their representation and that the representation made by Historic England to the SADMP is in relation to local heritage matters and the tests of soundness of the Plan. Representations received from HE during the Regulation 19 consultation raised no further issues as highlighted in the schedule at Appendix A to this statement.
- **Natural England** – NE's representations to the DtC SoCG dated 20 March 2020 and 23 February 2021 (DtC SoCG Schedule of Representations (February to April 2021 refers)) raised no strategic issues which required addressing in the SADMP.

### **3. What are the outcomes of the DtC?**

3.1 The outcomes of the DtC as set out in the SoCG are summarised below:

#### **Strategic Priority 1. Homes and Jobs**

**a) Housing Delivery:** 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.

**Key Partners:** Blackpool Council and neighbouring authorities Fylde Borough Council and Wyre Borough Council.

#### **Outcomes:**

- Agreement by neighbouring authorities on the approach to meeting the housing requirement as set out in the SADMP including the proposed housing allocations in Policy HSA1 contribute to enabling Blackpool to meet its housing requirement as set out in the Core Strategy;

- Agreement that Blackpool does not have the capacity to meet any unmet housing need from neighbouring authorities;
- Agreement to continue to work collaboratively with Fylde and Wyre Borough Councils in relation to housing provision across the Fylde Coast Peninsula.

### **Strategic Priority 1. Homes and Jobs**

#### **b) Blackpool Airport Enterprise Zone**

**Key Partners:** Blackpool Council, neighbouring authorities Fylde Borough Council and Wyre Borough Council; Lancashire County Council, Lancashire Enterprise Partnership, Highways England

#### **Outcomes:**

- Agreement on Policy DM8: Blackpool Airport Enterprise Zone to ensure the successful delivery of the Enterprise Zone and a consistent cross boundary approach with neighbouring authority Fylde Borough Council;
- Agreement to continue to work with Fylde Borough Council, Lancashire County Council, Lancashire Enterprise Partnership and Highways England to deliver the Enterprise Zone Masterplan.

### **Strategic Priority 1. Homes and Jobs**

**c) Provision for Travellers:** Delivery of sites to meet the identified needs of Travellers in the wider sub-area context.

**Key Partners:** Blackpool Council, neighbouring authorities Fylde Borough Council and Wyre Borough Council; Lancashire County Council.

#### **Outcomes:**

- Agreement of joint evidence base with Fylde and Wyre Borough Councils – Submission Document EB008 – Blackpool, Fylde and Wyre Gypsy and Traveller Accommodation Assessment Update (October 2016);
- Agreement by the three Fylde Coast Authorities that the outstanding need identified in the 2016 GTAA has been met through the granting of planning permissions and there is no longer a need to identify a site/s within the SADMP;



- Agreement to continue to work with Fylde and Wyre Councils in meeting the future needs of Travellers and Travelling Showpeople across the Fylde coast sub-region to ensure the requirements of these communities are met.

### **Strategic Priority 2. Retail, leisure and other commercial development**

- a) Retail provision and sub-regional hierarchy of centres:** to establish the role of town centres within the Fylde Coast and their position in the retail hierarchy and future retail growth.

**Key Partners:** Blackpool Council, neighbouring authorities Fylde Borough Council and Wyre Borough Council.

#### **Outcomes:**

- Agreement that the SADMP Publication document provides a suite of policies to enhance the vitality and viability of Blackpool Town Centre to underpin its identified role as the Sub Regional Centre for the Fylde Coast in line with the findings of the 2018 Retail, Leisure and Hotel Study.
- Agreement that Blackpool Town Centre as the sub regional centre for the Fylde Coast will serve the needs of residents across the sub area and Blackpool Council will continue to work with neighbouring authorities on cross boundary retail matters.

### **Strategic Priority 3. Infrastructure**

- a) Transport** 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.

**Key Partners:** Blackpool Council, neighbouring authorities Fylde Borough Council and Wyre Borough Council; Lancashire County Council, Highways England, Marine Management Organisation

#### **Outcomes:**

- Agreement on Policy DM8: Blackpool Airport Enterprise Zone and DM41: Transport Requirements for New Development;
- Agreement to continue to work with neighbouring authorities, Lancashire County Council, Highways England and Marine Management Organisation to ensure ongoing strategic improvement to the infrastructure on the

Blackpool/Fylde/Wyre boundaries and the Strategic Road Network to benefit sub-regional connectivity.

### **Strategic Priority 3. Infrastructure**

**b) Water-related infrastructure** is a key cross boundary issue which directly affects the delivery of built development across the Fylde Coast. 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.

**Key Partners:** Blackpool Council, including as Lead Flood Authority, neighbouring authorities Fylde Borough Council and Wyre Borough Council; Lancashire County Council as Lead Flood Authority, Environment Agency, Marine Management Organisation, United Utilities.

#### **Outcomes:**

- Agreement on additional Policy DM31 – Surface Water Management included in the Publication version of the SADMP;
- Agreement to ongoing collaboration with neighbouring authorities, Lancashire County Council, Environment Agency, United Utilities and the Marine Management Organisation.

### **Strategic Priority 4. Climate Change and natural and historic environment**

#### **a) Natural Environment - Managing impacts on habitats and/or landscape character designations and seascape**

**Key Partners:** Blackpool Council, neighbouring authorities of Fylde Borough Council and Wyre Borough Council; Lancashire County Council, Natural England, Environment Agency and Marine Management Organisation

#### **Outcomes:**

- Agreement on Policy DM35: Biodiversity;
- Agreement that the HRA ([SD006](#) refers) and SA ([SD005](#) and [SD005a](#) refer) has informed the SADMP taking into account the wider cross boundary implications of development on habitats within the Borough and elsewhere in the Fylde Coast sub-area and that none of the policies or associated allocation sites were considered to have a likely significant effect on any of the European sites alone, or in combination;

- Agreement on ongoing collaboration with neighbouring authorities, Natural England and the Marine Management Organisation to manage cross -boundary impacts on the natural environment

**Issue (ii): Does the Sustainability Appraisal (SA) comply with the requirements of the Strategic Environmental Assessment Directive (SEA Directive) and the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations)?**

Questions:

**1. Has the SA process complied with the requirements of the SEA Directive and the SEA Regulations?**

- 1.1 Yes. The Council appointed Arcadis, a suitable qualified and experienced consultancy in 2017 to undertake the Sustainability Appraisal for the SADMP. Arcadis produced a combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) (Documents [SD005](#) and [SD005a](#) refer).
- 1.2 SA is a process for assessing the social, economic and environmental impacts of a plan and it aims to ensure that sustainable development is at the heart of the plan-making process. It is a legal requirement under planning law<sup>3</sup>. The law states that SA must also comply with the requirements of SEA, which is required under EU law by the SEA Directive<sup>4</sup> and transposed into English law by the SEA Regulations<sup>5</sup>.
- 1.3 At paragraph 1.2.1 of document SD005 it highlights that National Planning Policy Guidance (NPPG) states that SA should incorporate the requirements of the SEA Regulations. The SA of the SADMP therefore incorporates the requirements of SEA and this has resulted in an SA Report that also satisfies the requirements of an SEA 'Environmental Report' to accompany the eventual adoption of the SADMP.

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<sup>3</sup> SA is required by Section 19 of the Planning and Compulsory Purchase Act 2004  
<http://www.legislation.gov.uk/ukpga/2004/5/section/19>. It also incorporates the requirements of European Directive 2001/42/EC

<sup>4</sup> Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (SEA Directive)

<sup>5</sup> The Environmental Assessment of Plans and Programmes Regulations 2004

## 2. Has the SA process been genuinely iterative and carried out in step with the stages of plan preparation?

- 2.1 Yes. During the Council's preparation of the SADMP, the SA has been applied as an iterative process of collecting information, defining alternatives, identifying environmental effects, developing mitigation measures and revising proposals in the light of predicted environmental effects to help contribute towards achieving sustainable development. Page 2 Figure 1-1 of the SA ([SD005](#) refers) sets out the iterative process that has been applied to the production of the combined SA and SEA for the SADMP.
- 2.2 Arcadis was appointed in 2016 to [update the Scoping Report](#) which had informed the SA for the Core Strategy, to inform the initial stage in the SA process for the emerging SADMP. The purpose of the update was to:
- Revise and set the scope and level of detail of the SA for the SADMP;
  - Identify relevant plans, policies, programmes and initiatives that will inform the SA process and the SADMP;
  - Identify relevant baseline information;
  - Identify key sustainability issues and problems; and
  - Present an SA Framework, consisting of sustainability objectives and sub-objectives, against which the SADMP can be assessed.
- 2.3 The Scoping Report for this SA was prepared and consulted on between January and March 2017 with, as a minimum, the three statutory consultees of Natural England, the Environment Agency and Historic England. The Scoping Report was finalised in light of responses received during the consultation window and is available online<sup>6</sup>.
- 2.4 This SA scoping document was then subject to public consultation as part of the Regulation 18 consultation on the SADMP between 12 June and the 24 July 2017.
- 2.5 In November 2020 Arcadis produced a further [updated SA report](#) which provided a summary of the SA process at that stage (Stage A) as well as an assessment of the proposed DM Policies and the proposed site allocations (Stage B) which were subject to informal consultation during 2020. This November 2020 SA supported the Regulation 19 consultation which was undertaken during February to April 2021.
- 2.6 Following the receipt of representations to this consultation the SA was updated as at April 2021 and submitted alongside the SADMP and other supporting documentation. Document [SD005](#) and [SD005a](#) refer.

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<sup>6</sup> [FINAL SA Scoping Blackpool LP Part 2 FINAL 27-03-17](#)

**3. Are the reasonable alternatives considered by the SA sufficiently distinct to highlight the different sustainability implications of each?**

- 3.1. Yes. Section 5 (page 27 refers) of the SA addresses Stage B of the SA process in developing, refining and appraising options. Six stages are highlighted under this section with Stage B2 specifically involving developing and refining options. The SA states throughout the Plan-making process for the SADMP the Council has been developing and refining their proposed range of development management policies and site allocations. Their decision-making process has been informed by a broad and robust evidence base, including assessments results from the SA process.
- 3.2 At Stages B3 and B4 the SA report presents the results of the assessments of policies and site allocations in the SAMDP. These assessments predict and evaluate the effects of all options individually and cumulatively and are summarised in Sections 5.4 and 5.5 of the report. Borough-wide cumulative and synergistic effects are presented in Chapter 6.
- 3.3 How the preferred option were arrived at and what reasonable alternatives were considered is dealt with at paragraphs 5.2.4 to 5.2.15. With respect to the development management policies the report states that crucially, these policies in the SADMP conform with Government policy; conform with the Plan strategy adopted through the Plan Part 1; would enable the local development needs, including the housing requirement, to be met; are focussed on achieving socially, environmentally and economically sustainable development in Blackpool; tackle key local issues; and are proportionate and manageable. The report goes on to state that the Council has considered that any alternative to this approach would risk making the Plan discordant with the Plan Part 1, discordant with national planning policy, fail to satisfy Blackpool's housing need or leading to unsustainable development, and therefore would not be reasonable. The Council has therefore not considered reasonable alternatives to the proposed DM policies.
- 3.4 With respect to the Site Allocations paragraph 5.2.13 highlights that the full set of sites, and reasonable alternatives considered during the Plan making process, have all been assessed to the same level of detail in order to inform the Council's selection process. These results are presented in full in Appendix D ([SD005a](#) refers). The approach adopted to assessing the sites and their sustainability implications adopts an accepted methodology using colour coding so it is easily discernible the outcome of the assessment for each site.
- 3.5 Arcadis Consultants state at paragraph 5.2.15 that the Council's approach to reasonable alternatives is considered to be legally compliant in light of the requirements of the SEA Directive and Regulations as well as relevant case law.

### **Issue (iii): Is the SADMP supported by a robust approach to Habitats Regulation Assessment (HRA)?**

#### Question:

#### **1. Is the HRA adequate and is the SADMP consistent with its findings? Have Natural England's concerns been overcome?**

1.1 It is considered that the HRA is adequate and the SADMP is consistent with its findings. The Council appointed Arcadis, a suitably qualified and experienced consultancy, to prepare the HRA for the SADMP. The HRA comprises Stage 1 of the HRA process - the initial and detailed screening of the Local Plan. It has been carried out in line with the requirements of the relevant legislation and guidance (see Section 2.1). This HRA Screening concluded that none of the policies or associated allocation sites were considered to have a likely significant effect on any of the European sites alone, or in combination.

1.2 A Statement of Common Ground (SoCG) with Natural England has been drawn up (EL1.004c). Section 3 of the SoCG confirms that there are no outstanding concerns with respect to the HRA.

### **Issue (iv): Has the SADMP been produced in accordance with the Regulations and the Council's Statement of Community Involvement (SCI) and Local Development Scheme (LDS)?**

#### Questions:

#### **1. Does the SADMP make explicit which, if any, of its policies are strategic or not?**

1.1 Essentially the SADMP is a non-strategic document and as a Part 2 Plan it gives effect to the strategy in Blackpool Local Plan Part 1: Core Strategy. With respect to the relatively minor amendments to the Green Belt proposed in the SADMP, dealt with under Matter 3, whilst the changes to the green belt could be regarded as having a strategic element in itself, for the reasons identified under Matters 3, it does give effect to the Part 1 plan and meets the exceptional circumstances test in NPPF.

#### **2. Does the SADMP clearly state where a policy is intended to supersede another policy in the adopted development plan and identify the superseded policy or policies?**

2.1 The submission document of the SADMP does not clearly state where a policy is intended to be superseded. Through the process and earlier consultations it was referenced

in previous documents, in particular the [Regulation 18 Scoping Document](#) (page 6 paragraph 1.7 refers) and the [informal Consultation document \(January 2019\)](#) (page 1 paragraph 2.1 refers), that all the saved policies would be superseded on adoption of the SADMP. However if the Inspector considers that there is a need to make such a reference in the document and is minded to include a main modification to address this issue, the Council would find this acceptable.

**3. Has consultation on the SADMP been carried out in accordance with the Council’s SCI?**

3.1 Consultation on the SADMP has been carried out in accordance with the Council’s SCI (document [SD012](#) refers). Further detail is set out in the Consultation Statement December 2020 ([SD011](#)) and the Summary of Representations to the SADMP Publication Regulation 22 (1) (c) (v) Statement June 2021 ([SD009](#)).

**4. Have the publication, advertisement and availability of the SADMP followed the statutory procedures set out in the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) England Regulations 2012?**

4.1 Publication, advertisement and availability of the SADMP during consultation has been carried out in accordance with the statutory procedures set out in the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) England Regulations 2012. Further detail is set out in the Consultation Statement December 2020 ([SD011](#)) and the Summary of Representations to the Local Plan Part 2 Publication Regulation 22 (1) (c) (v) Statement June 2021 ([SD009](#)).

**5. Is the scope of the SADMP as described in the LDS?**

5.1 Yes, the scope of the SADMP is as described in the LDS, document [SD013](#) refers. The overview of the scope is set out in Section 3 of the LDS under paragraphs 3.2, 3.3 and 3.6 (pages 5 and 7 refer) and is reproduced below.

| <b>Extract from LDS</b>  |
|--|
| <p>3.2 The Council is preparing the Blackpool Local Plan Part 2 which when adopted will replace all the remaining ‘saved’ policies in the 2006 Blackpool Local Plan (Appendix 2 refers).</p> <p>3.3 Part 2 of the Local Plan will set out:</p> |

#### Extract from LDS

- **Site allocations:** sites to be allocated for development for particular land uses, (for example, housing, employment, traveller sites). The intention is to provide clarity to planning applicants and the community regarding the land uses that, in principle, are acceptable to the council on specific sites.
- **Designations:** land which should be safeguarded (e.g. for open space; areas of important biodiversity, transport infrastructure) or where specific policies apply for example local centres.
- **Development Management policies:** detailed planning policies, which will be used by the Council when assessing planning applications. The Development Management policies offer detailed, often criteria-based policies in areas of policy where further detail is needed beyond that contained in the Core Strategy. The development management policies do not cover all policy areas; where principles for development are addressed by the National Planning Policy Framework (NPPF) or Core Strategy policies, they are not repeated.

#### Policies Map

3.6 The Policies Map illustrates land-use designations defined by planning policy such as Green Belt and site-specific allocations such as housing sites, employment sites and public open space. The updated Policies Map will be prepared alongside the Local Plan Part 2 following the same timetable.

5.2 As can be seen from the content page of the SADMP ([SD001](#) refers) the document is structured as follows:

**Section 2 – Site Allocations** including housing sites, a town centre mixed use site, an allotment site and safeguarded.

**Section 3 – Development Management Policies** including policy sub-sections containing policies relating to Housing, Economy, Design, Heritage, environment, Community and Transport.

5.3 The updated policies maps ([SD002](#) and [SD003](#) refer) set out the designations referenced in the SADMP.



**6. Has the timing of production of the SADMP followed the timetable set out in the LDS? Will the LDS need to be updated?**

6.1 The timetable for the SADMP in the LDS June 2021 is reflective of the progression of the SADMP to submission in June 2021. The timetable is reproduced below from page 6 of the LDS.

**Table 1 - Timetable for the Preparation of the Blackpool Local Plan Part 2**

| <b>Task</b>   | <b>Timescale</b>               |
|---|--------------------------------|
| Evidence /Information gathering/stakeholder consultations and preparing a draft plan              | September 2016 – February 2019 |
| Consultation Scoping Document ( <b>Regulation 18</b> )  | June/July 2017                 |
| Informal Consultation Paper – Proposed Site Allocations and draft Development Management Policies | January/February 2019          |
| Preparing the Publication (Proposed Submission) plan  | March 2019 – January 2021      |
| Publication Consultation ( <b>Regulation 19</b> )   | February/ March 2021           |
| Respond to representations and prepare for submission   | March/ April/May 2021          |
| Submission to Secretary of State ( <b>Regulation 22</b> )   | June 2021                      |
| Examination ( <b>Regulation 23 and 24</b> )   | September/October 2021         |
| Inspector’s Report ( <b>Regulation 25</b> )   | December 2021                  |
| Adoption by Full Council ( <b>Regulation 26</b> )   | February 2022                  |

6.2 At paragraph 3.5 of the LDS it is recognised that the timetable following June 2021 submission is dependent on various factors beyond the control of the Local Planning Authority. The paragraph states:

‘Once the Local Plan Part 2 is submitted to the Secretary of State the timing of subsequent stages is reliant on the appointed Inspector and dependent on the need to publish and consult on Main Modifications recommended by the Inspector following the examination hearings.’

6.3 The timetable post submission did anticipate Examination of the SADMP around September/October 2021 but this is now programmed to take place in early December 2021

as discussed and agreed with the Inspector. It is therefore estimated that Adoption of the Plan will now take place in Spring of 2022, however it is difficult to predict the course of the Examination Hearings and any subsequent consultations on main modifications to be able to predict with any certainty the timetable to adoption. It is therefore considered that there is no need to update the LDS at this stage.

6.4 The LDS also sets out the initial timetable for the review of the Local Plan Part 1: [Core Strategy](#). Section 4 paragraphs 4.1 to 4.7 relates and Table 3 highlights the timetable for the initial scoping of the Core Strategy to be undertaken during 2021 and 2022.

6.5 The review of the Core Strategy has now commenced and an initial assessment of the policies and evidence base is currently being undertaken. The LDS 2021 does not provide a complete timetable for the whole review of the Plan as at the time of publishing the LDS it was not known whether the review would be partial or in full. From the work that has currently been undertaken since June 2021 it is looking likely that the Council will be undertaking a full review of the Core Strategy the implications of which is that a revised plan is unlikely to be adopted before 2024/2025.

**Issue (v): To what extent does the SADMP contain policies designed to secure that the development and use of land in the Borough contribute to the mitigation of, and adaption to, climate change?**

Question:

**1. To what extent does the SADMP contain policies designed to secure that the development and use of land in the Borough contribute to the mitigation of, and adaption to, climate change in accordance with Section 19(1A) of the Act?**

1.1 Section 19 (1a) of the act states:

*“Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of and adaptation to, climate change.”*

1.2 The Local Plan Core Strategy forms the overarching part of the Development Plan for Blackpool. The Core Strategy Vision sets out that *“promoting sustainable development has been integral to transforming Blackpool and addressing climate change issues”*. Several objectives within the Core Strategy support Blackpool’s contribution to the mitigation of and adaption to, climate change with Objective 6 being most directly linked to: *“Address climate change issues by managing flood risk, protecting water quality, reducing energy use and encouraging renewable energy sources”*.

1.3 To deliver the objectives and Vision for the Core Strategy rather than having a single policy focussed on mitigating and adapting to climate change, the Blackpool Local Plan Parts 1 and 2 contain which contribute to the mitigation of and adaption to climate change.

1.4 Within the Core Strategy there are a number of Core Strategy policies as set out below:

- Policy CS5 seeks to set out a sustainable, high quality transport network seeking improvements to public transport and developing a safe, enhanced and enhanced network of pedestrian and cycle routes to increase the proportion of journeys made on foot or bike.
- Policy CS6 seeks to achieve high-quality and well connected networks of green infrastructure by protecting existing green infrastructure networks, enhancing the quality, accessibility and functionality of green infrastructure, creating new accessible green infrastructure and connecting green infrastructure with the built environment and with other open space.
- Policy CS9 seeks to reduce flood risk, manage the impacts of flooding and mitigate the effects of climate change through directing development away from areas at risk of flooding, incorporating appropriate mitigation and resilience measures, sustainable drainage system and seeking not to discharge surface water into the existing combined sewer network.
- Policy CS10 seeks to mitigate the impacts of climate change and minimise carbon emissions by ensuring buildings are energy efficient, with an energy hierarchy set out for non-residential buildings with the policy also setting out criteria for supporting proposals for renewable, low carbon or decentralised energy schemes; and the requirement for all new non-residential development over 1,000 sqm. being required to achieve BREEAM 'very good'.
- Policy CS13 seeks to secure the efficient use of land and support high densities in main centres and on public transport corridors. A Green and Blue Infrastructure Strategy ([EB019](#) and [EB020](#)) has been published to support the delivery of Core Strategy policies. The Council have recently gone out to consultation on the [draft Greening Blackpool SPD](#) which sets out the mechanisms to secure the delivery of green infrastructure in the borough.

1.5 In addition there are a number of policies within the SADMP contains measures which seek the mitigation of, and adaption to, climate change:

- Policy DM1 sets out design requirements for new building housing developments and includes requirements for houses including for grey water harvesting, the design and orientation of roofs to assist support solar energy generation and minimise energy consumption and to explore renewable and low carbon energy generation and consider the incorporation of renewable energy technology.
- Policy DM8 sets out the requirement for a design framework for the enterprise zone to take into account green infrastructure, sustainable drainage and to take into account the objectives of the Council's Green and Blue Infrastructure Strategy.
- Policy DM17 sets out more general design principle which states that the materials used in developments should, wherever possible, be re-used or recycled and be re-usable or recyclable.
- Policy DM21 sets out landscaping requirements which includes the requirement for development to contribute towards tree planting in accordance with the Greening Blackpool SPD, support connectivity to wider green infrastructure networks and consider the use of green walls and green roofs; and to minimise hard landscaping.
- Policy DM31: Surface Water Management sets out the drainage hierarchy for new development and measures to minimise surface water run-off.
- Policy DM32 sets out the necessary mitigation measures to allow wind energy proposals, including supporting community-led initiatives.
- Policy DM33 considers development proposals affecting the coast and foreshore and supports improvements to flood protection.
- Policy DM35 sets out the requirements of proposals to ensure development results in no loss or harm to biodiversity and minimising impact on biodiversity, providing net biodiversity gains through good design, which links to other policy objectives related to mitigation of, and adaption to, climate change.
- Policy DM41 adds further detail to how development proposals can deliver the transport policy objectives set out in the Core Strategy and requires developments to provide for active travel, public transport and electric vehicle charging infrastructure and to secure travel plans to promote the use of active travel and public transport.

1.6 In addition the Sustainability Appraisal (SA) ([SD005](#)) used to assess the social, economic and environmental impacts of the SADMP and ensure sustainable development is at the heart of the plan-making process contains Objective 17 which specifically relates to limiting and adapting to climate change. The policies in Part 2 when assessed against this SA objective scored either a positive or neutral effect with one exception (Policy DM8) which scored a combination of both positive and negative effects (SA pages 34 to 35 refer).

1.7 It is therefore considered that the SADMP contains a comprehensive framework of policy that contribute to the mitigation of and adaption to, climate change in accordance with Section 19(1A) of the Act.

1.8 Furthermore, the Council has recently declared a climate emergency and have published a Climate Action Plan ([Climate Action Plan \(blackpool.gov.uk\)](#)). The Action Plan is currently subject to consultation and sets out a package of measures to reduce the Council's carbon emissions to net zero (compared to 1990 emissions) by 2030 and supporting measures to reduce emissions in the town as a whole. This action plan will provide further support to the implementation of Local Plan policies.