

**BLACKPOOL LOCAL PLAN**

**PART 1: CORE STRATEGY**

**BLACKPOOL COUNCIL STATEMENT**

**MATTER 5**

**TRANSPORT, GREEN INFRASTRUCTURE, WATER MANAGEMENT AND  
SUSTAINABLE DESIGN AND RENEWABLE/LOW CARBON ENERGY**

**APRIL 2015**

**Blackpool Council**

The logo for Blackpool Council features the text "Blackpool Council" in a serif font. "Blackpool" is in dark blue and "Council" is in purple. Below the text is a stylized graphic consisting of two parallel, wavy lines in a light blue-grey color.

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## **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*

### **Introduction**

This Statement has been produced by Blackpool Council to outline its response to the Matters and Questions raised by the Inspector for the Hearings into the Blackpool Local Plan Part 1: Core Strategy Development Plan Document (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 Core Strategy. To assist document numbers are referenced where appropriate.

### **Position of the Council regarding Matter 5**

#### **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?**

5.1.1 The Council does not consider that a specific reference in Policy CS5 or supporting text to a recognition that for some development there may be no alternative to car use is necessary to the soundness of the plan.

5.1.2 Policy CS5 Connectivity adopts a positive approach to promoting sustainable transport across the Borough and is concerned about developing a sustainable high quality transport network for the town including a quality arrival experience. The policy sets out those measure and requirements that are considered necessary to achieve this.

5.1.3 In summary the policy seeks to promote a modern, frequent convenient and well integrated public transport network with respect to rail, tram, bus and coach operators; encouraging integration of Blackpool International Airport with public transport; improving interchange between transport modes; reducing road congestion by relieving 'pinch points'; addressing car parking capacity and provision; enhanced and extended pedestrian and cycle routes and improved signage; and pro-actively working with developers to change travel behaviour to increase the proportion of journeys that use sustainable transport.

5.1.4 The approach set out in Policy CS5 is compliant with NPPF paragraphs 29 to 41 – Promoting Sustainable Transport. In particular paragraph 29 states that *'The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how*

*they travel.....'* As a compact urban area Blackpool has a real opportunity to facilitate sustainable development and promote sustainable transport modes. Undoubtedly there will be locations where there may be no alternative to the private car and indeed many visitors to Blackpool will continue to arrive by car, however the policy takes a positive approach to promoting sustainable transport within the town in line with NPPF.

**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?**

- 5.2.1 It is recognised that parking provision and management has a key part to play in ensuring Blackpool remains a tourist destination of choice and is also influential in determining where Fylde Coast residents choose to shop. It is therefore acknowledged in paragraph 5.77 of the Core Strategy (Document SD001) that good quality, well planned and accessible car parking is required to support the vitality and viability of the Blackpool Town Centre as well as the wider resort economy. This is specifically referenced in Policy CS5 – Connectivity at part 5 which is concerned with addressing car parking capacity not only within the town centre but to *'address wider issues of parking provision across the Borough.'*
- 5.2.2 In the supporting text to Policy CS5, parking is dealt with under paragraphs 5.77 to 5.80 where clear reference is made to parking issues across the resort and not just limited to those issues relating to the town centre. Paragraph 5.77 makes reference to the parking provision of the town overall including significant provision particularly in Central Corridor, as well as the underuse of peripheral car parks to the town centre. Paragraph 5.78 highlights the parking issues in the inner areas and 5.79 refers to the location of car parks at the main arrival points into the resort. Again with the management of car parking, paragraph 5.80 refers to the wider resort.
- 5.2.3 In addition to the above, the provision of coach parking is included at part 1 (d) of Policy CS5 and in paragraph 5.74, highlighting the major contribution this mode of transport makes to the resort economy and acknowledging the need for sufficient and accessible coach layover parking. Also Part 2 of CS5 supports improvements to airport parking along with other measures to support enhanced travel opportunities for residents, visitors and businesses.
- 5.2.4 In addition to Policy CS5, Policy CS22 – Key Resort Gateways supports improved parking and reception facilities. Paragraph 7.37 of the supporting text acknowledges the importance of visitor car parking along Central Corridor where there has been network remodelling, public realm improvement, public open space and new car parks which have greatly improved the arrivals experience. In paragraph 7.39 reference is made to a number of development sites within or adjacent to resort gateways and how these sites will provide a major catalyst for further intervention. However it is made clear that any change in parking provision as a result of major development at these locations must not undermine the resort's ability to accommodate visitor trips.

- 5.2.5 Policy CS7 – Quality of Design requires new development to incorporate well integrated car parking and Policy CS12 – Sustainable Neighbourhoods at part (f) requires the need to address a balanced provision of resident and visitor car parking alongside streetscape enhancement. Improved access and parking for Blackpool Airport is also covered in Policy CS27 – South Blackpool Transport and Connectivity. In addition saved policy AS1 – General Development Requirements in the Blackpool Local Plan 2001-2016 (Document AD008) requires appropriate levels of car parking in accordance with standards set out in Appendix B of the adopted plan.
- 5.2.6 In consideration of the above and in light of the fact that the policies of the Development Plan should be read as a whole, it is the Council’s view that visitor parking outside the town centre is adequately addressed in policy.

**5.3 Is specific reference to protection for ancient and veteran trees in policy CS6 necessary to the soundness of the plan?**

- 5.3.1 Specific reference to the protection of ancient and veteran trees in policy CS6 is not considered necessary to the soundness of the plan. It is considered to be a repetition of NPPF paragraph 118 which states that when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity. Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss

**5.4 Is it necessary for the plan to set a target for the creation of new woodland?**

- 5.4.1 There is no requirement in National Planning Policy to set a target for the creation of new woodland in Local Plans. The Access to Woodland Standard is an aspirational standard which would be extremely difficult to apply in Blackpool due to the Borough’s intensely built up urban form.
- 5.4.2 New woodland will be considered as part of the Council’s future Green Infrastructure Strategy.

**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)**

- 5.5.1 Policy CS6: Green Infrastructure is relevant to development across the whole of the Borough and states in part 3 that international, national and local sites of biological and geological conservation importance will be protected having regard to the hierarchy of

designated sites and the potential for appropriate mitigation. Measures that seek to preserve, restore and enhance local ecological networks and priority habitats/ species will be required where necessary.

5.5.2 The sites identified in policy CS25 (Moss House Road and Whyndyke Farm) have both been the subject of outline planning applications with both schemes accompanied by a comprehensive environmental statement. Natural England has raised no objection to the developments in principle.

5.5.3 It is considered that the general requirement of policy CS6 and the requirements set out in CS27: Marton Moss adequately addresses the impact of development on Natura 2000 sites (further discussed in Question 1.2(b) and(c)). A further Habitat Regulations Screening Assessment will be undertaken for the Local Plan Part 2: Site Allocations and Development Management Policies Document to ensure the detailed policies and sites do not have a significant adverse impact on Natura 2000 sites.

5.5.4 In further correspondence (see Appendix B of Blackpool Council's Matter 1 Statement), Natural England has confirmed the planning application process for the sites in policy CS25 has overtaken the plan process and the issues identified in the previous Natural England representation have in most part been resolved through mitigation measures presented in the planning applications. Natural England has suggested it would be beneficial for Appendix 4 of HRA to be updated to reflect the current situation. This will be submitted to the Inspector in due course.

**5.6 It is necessary/appropriate for policy CS6 to state that, subject to mitigation measures, development will be permitted adjacent to designated sites?**

5.6.1 Policy CS6 sets out the strategic approach to Green Infrastructure in the Borough. Appendix B of the Core Strategy identifies that current Local Plan Policies NE4: SSSIs and NE5: Other Sites of Nature Conservation Value will continue to be saved once the Core Strategy is adopted. These policies provide the development management approach to SSSIs and other designated sites.

5.6.2 It is therefore not necessary for the Core Strategy policy 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?**

5.7.1 Policy CS6 sets out the strategic approach to Green Infrastructure in the Borough. It is informed by the Open Space, Sport & Recreation Audit and Position Statement (November

2014)(EB0024) which provides a robust up-to-date assessment of the existing open space within the borough.

5.7.2 Paragraph 74 of the NPPF states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

5.7.3 It is not considered that Policy CS6 inappropriately restrictive in terms of resisting the loss of open space, sports and recreational buildings. Part 1(a) of the policy allows for the loss of green infrastructure in exceptional circumstances where it is allowed as part of an adopted DPD or where provision is made for appropriate compensatory measures, mitigation or replacement or in line with national planning policy. This approach accords with the National Planning Policy Framework.

**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?**

5.8.1 Consideration of existing open space and playing field allocations will be addressed as part of the Local Plan Part 2: Site Allocation and Development Management Policies. Any proposal to come forward prior to this would be considered against NPPF and Core Strategy Policy CS6.

**5.9 Is United Utilities' suggested modifications to policy CS9 (1e) and its supporting text necessary to the soundness of the plan?**

5.9.1 The Council considers that United Utilities' suggested modifications to policy CS9 (1e) and its supporting text are not necessary to the soundness of the plan.

5.9.2 It would be unrealistic and unreasonable to amend CS9 (1e) to state 'development must not discharge surface water into the combined sewer network...'. A reduction of the existing surface-water run-off rate is considered to be a more reasonable approach and has been supported by the Environment Agency and United Utilities previously. The suggested amendments to the supporting text are already considered to be appropriately addressed elsewhere in the policy and also in policy CS6: Green Infrastructure.

## **5.10 Is MM016 necessary to the soundness of policy CS9?**

5.10.1 Proposed Minor Modification MM016 is intended to improve clarity and responds to a representation made to the Proposed Submission. It does not alter the direction, intention or meaning of policy CS9 and as such, is not necessary to the soundness of the plan.

## **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?**

5.11.1 The Housing Standards Review: Technical Consultation took place in autumn 2014 with the outcome yet to be published. The consultation highlighted that a 'statement of policy' should be issued by the Government in early 2015 (at the time of writing this has not been issued) which will set out how these standards should be applied in Local Plans and in considering planning applications. It will also set out new national planning policy that should be considered when applying specific paragraphs of the National Planning Policy Framework.

5.11.2 In respect of energy requirements, from the date of the policy statement, local planning authorities will still be able to set planning policies requiring energy reductions above the Building Regulations until the zero carbon policy comes into effect. The legislation (Planning and Energy Act 2008) that provides Local Authorities in England with the ability to set these policies is to be amended in late 2016 (subject to parliamentary approval).

5.11.3 After this point, the Government has confirmed that the energy efficiency requirements of Building Regulations will be set at a level equivalent to Code Level 4 (25% above Part L 2010). Until this amendment in 2016, the Government expects local planning authorities to take note of the direction of policy with encouragement not to exceed Code Level 4 energy requirements.

5.11.4 Core Strategy Policy CS10(2): Sustainable Design and Renewable and Low Carbon Energy requires development to meet residual energy requirements, where feasible and viable, through the use of renewable and low carbon generating technologies. It was amended to reflect the recommendations of the Local Plan Viability Report with part 2 now providing a flexible approach to residual energy requirements 'where feasible or viable'.

5.11.5 As discussed above, it is accepted that Councils are able to set policies in their Local Plans requiring energy reductions above the Building Regulations until the zero carbon policy comes into effect in late 2016.

5.11.6 However, if the Inspector is minded to make a modification to remove CS10(2) due to it becoming out of date relatively early in the plan period, the Council will support this.