

# BLACKPOOL LOCAL PLAN PART 1: Core Strategy – Proposed Main Modifications

Response from Blackpool Council to the Inspector on the representations received to the Proposed Main Modifications consultation

20<sup>th</sup> October 2015



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## Contents

<b>Historic England</b>	<b>1</b>
<b>Home Builders Federation</b>	<b>2</b>
<b>The Princes Regeneration Trust</b>	<b>5</b>
<b>Blackpool Pleasure Beach</b>	<b>6</b>

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Further to the request from the Inspector for the Council to provide a brief response on the specific objections to main mods/suggestions of ways in which they could be improved.

Objections to the main mods were received from Historic England, the Home Builders Federation, the Prince's Regeneration Trust and Blackpool Pleasure Beach

### General Comment

Where the Inspector considers that the changes sought by an objector more closely align with the NPPF then the Council will be accepting of those changes.

## HISTORIC ENGLAND

### Main Mod9 – CS8 Heritage

In response to Historic England's concerns, to ensure the policy is in accordance with the NPPF and to make explicit the Council's desire to ensure that the significance of heritage assets is conserved and enhanced, the Council would not object to the change to wording sought by Historic England under this modification.

### Main Mod13 - CS12 Sustainable Neighbourhoods

Policy CS12 applies to all neighbourhoods, both historic and modern and requires development to reflect the built heritage of neighbourhoods. However, it will not be applied in isolation. Where appropriate, Policy CS12 will be applied in conjunction with Policy CS8 Heritage to ensure the conservation and enhancement of the

historic environment. This policy includes development management criteria and aims to reinforce local identity and character. Policy CS8 states that development proposals will be supported which respect and draw inspiration from Blackpool's built, social and cultural heritage, complementing its rich history with new development to widen its appeal to residents and visitors. Therefore, there is additional protection for the historic environment in the Plan, which takes account of the local context, and this policy will also be applied to development proposals.

Notwithstanding the above, the wording could be amended to read:

'Reflects the built heritage of the neighbourhoods and **conserves and** enhances the ~~appearance~~ setting of important heritage assets. ~~existing buildings and their settings.'~~

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However, if the Inspector considers that the wording sought by Historic England more closely reflects NPPF then the Council would accept this wording.

### **Main Mod20 – CS18 Winter Gardens**

In response to Historic England concerns to ensure compliance with the NPPF and 1990 Act, if the Inspector considers that the wording sought by Historic England more closely reflects NPPF then the Council would accept the change so that the part 2 of the policy would read:

2. Proposals must be presented in the context of a comprehensive approach, ~~respect the character and sustain~~ and enhance the ~~heritage-~~ **significance** of the Grade 2\* Listed Building and conform to the Winter Gardens ~~Conservation Statement-~~ Conservation Management Plan.

### **Comments by Historic England on the SA**

#### **Main Mods 09/13/20 SA**

The Council do not consider that there is any need for further SA assessment particularly in light of the above responses.

With respect to Main Mod 20 SA, the Council would like to clarify that the difference in reference numbers is because the Council deleted a number of Proposed Main Modifications in light of changes to the Planning Practice Guidance and then renumbered the remaining modifications. The SA addendum numbering does not reflect these changes.

## **HOME BUILDERS FEDERATION**

### **Main Mod01 – CS2 Housing Provision**

The Council does not think that it is necessary to explicitly state 'at least' before the provision figure of 4200 new homes.

The reference made by the HBF to the conclusions of many inspectors regarding housing figures being expressed as a minimum, the Council suggests negates the need to qualify the housing requirement figure in Policy CS2.

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In addition, Policy CS2 is supported by saved Policy HN4 - Windfall sites, which forms part of the Development Plan. Policy HN4 is a permissive policy for housing development within the urban area which the Council considers addresses the concerns of the HBF that sustainable housing development would be unnecessarily restricted and that the 4200 new homes would not be viewed as a ceiling.

However, with respect to the inclusion of 'at least', the Council will be advised by the Inspector on this issue.

The HBF also request that the word 'net' be included after the 4200 provision figure. The Council would find this acceptable as it provides clarification.

With respect to the housing requirement of 4200 new homes this is justified through our Housing Technical Paper and the Council's Statement at the Examination hearings.

#### **Main Mod02 – Para 5.11**

The proposed modification MainMod02 makes it clear that the sites identified in the SHLAA will form the basis of the sites to be identified in the Part 2 of the Local Plan: Site Allocations and Development Management Policies to provide clarity and a clear direction for developers prior to Part 2 of the Plan being adopted. The Council does not think that it is appropriate that a reference to the SHLAA is included in the policy as it will be superceded once Part 2 of the Local Plan is adopted. It is considered that making reference to the SHLAA in the supporting text is more appropriate.

With respect to the HBF's concern over delivery of sites, as previously mentioned, 'Saved' Policy HN4 – Windfall Sites is a permissive policy for housing development within the urban area which the Council considers negates the concerns of the HBF that sustainable housing development would be unnecessarily restricted.

#### **Main Mod03 – Para 5.13**

The Council considers that is not appropriate to be more definitive as to the scale of a buffer. Any buffer will reflect the latest position as established through monitoring and updating of the SHLAA in 2016 to inform Part 2 of the Blackpool Local Plan and at the Examination of Part 2. Again, as previously referred the permissive 'Saved' Policy HN4 allows for sustainable housing development to come forward within the urban area.

#### **Main Mod05 – CS2 Housing Provision**

The Council considers that the proposed amendment is sound. Please refer to the Council's response under MainMod2.

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## **Main Mod16 – paras 6.24 and 6.25**

The Council welcomes the support from the HBF for the amendments to paragraph 6.24.

With respect to the main modification to paragraph 6.25 and the reference to the Government's Technical Housing Standards – nationally described space standards. There are 2 aspects to this issue relating to conversions and new build.

In considering applying the nationally described space standards to conversions, the Council in March 2011 adopted the New Homes from Old SPD which sets out space standards along with other requirements and best practice to provide design guidance for the conversion and sub-division of property. The standards in the SPD provide a higher space standard than the nationally prescribed standards. The higher space standards in the SPD were subject to viability assessment along with the Core Strategy and were found not to compromise development. Under these circumstances the Local Planning Authority is able to 'passport' in the national space standards with Local Plan Policy CS16 point 2 providing the necessary Local Plan policy. Officers will be preparing a committee report which will recommend that the Government's Technical Housing Standards – nationally prescribed space standards will be used to determine applications for conversion and sub division of property to residential.

With respect to the amended wording of MainMod16 paragraph 6.25 and new build residential development. With further clarification on the application of the new standards it is acknowledged that the viability assessment of the Local Plan was prior to the introduction of the nationally prescribed standards and as such, to introduce the requirement for new build to be subject to the standards, as indicated by the amended wording of paragraph 6.25, is premature. This issue of appropriateness of the government's housing standards to new build in Blackpool can be addressed through the preparation of Part 2 of the Local Plan.

Therefore, if the Inspector is minded to delete paragraph 6.25 in response to the HBF's representation, then the Council will find this acceptable.

However if the Inspector wishes to include some wording at paragraph 6.25 for clarity the Council would be supportive of replacing the paragraph with wording along the lines of;

*6.25 'With respect to the conversion or sub-division of property for residential development, the space standards set out in the Council's New Homes from Old Places SPD will be replaced with the Government's Technical Housing Standards – nationally described space standards. Other guidance in the SPD not related to the nationally described space standards will still apply in determination of applications. With respect to 'new build' residential development, consideration will be given to applying the nationally described space*

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*standards through the preparation of Part 2 of the Local Plan, the Site Allocations and Development Management document which will be subjected to the required consultation process and viability assessment.*

## **THE PRINCES REGENERATION TRUST**

### **Main Mod21 – CS18 Winter Gardens**

### **Main Mod 22 – para 7.14**

Main Mods 21 and 22 arose from an initial objection submitted by Historic England to paragraph 7.14<sup>1</sup> raising concerns over the scale of retail which would be suitable for the Winter Gardens. In summary Historic England do not support a scheme to place retail at the heart of the regeneration of the Winter Gardens, they stated that some retail that complements the proposed main new uses would be acceptable.

In response to this the Council proposed Main Mod 21 and 22 and Add Mod 30. No further representation has been received from Historic England on the proposed Main Mods 21 and 22 following consultation.

For background the Prince's Regeneration Trust is involved with the new Heritage Museum which is being developed within the Winter Gardens. Part of the proposed development includes some souvenir retail to support the development. This element of retail is ancillary to the main heritage museum and would not be compromised by Main Mods 21 and 22.

The Council considers that the wording 'limited retail' is appropriate as it responds to the request of Historic England and in doing so provides guidance for potential developers as to the broad scale of retail development that would be appropriate (the intention being to dissuade for example applications for supermarkets, department stores or large retail units which would not be suitable within the Winter garden complex) and at the same time ensures that any retail proposals that come forward do not compromise the Conservation Management Plan for the Winter Gardens.

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<sup>1</sup> Summary of Representations to the Proposed Submission Core Strategy (November 2014) Document SD010 page 49.

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## BLACKPOOL PLEASURE BEACH

### **Main Mod24 – CS20 Leisure Quarter (Former Central Station Site)**

The Council considers that Main Mod 24 is sound, justified and will be effective. Main Mod 24 strengthens criterion (b) of Policy CS20 to state that development must integrate with and support, whilst not undermining, existing resort core uses and attractions. Therefore, the modification seeks to ensure that development on this site does not undermine any existing resort core uses and attractions, which would include, but is not restricted to, the Pleasure Beach.

The Framework states that planning should operate to encourage and not act as an impediment to sustainable economic growth and the Council wishes to provide a positive policy framework for the Leisure Quarter, which is one of Blackpool's most strategically important development sites to maximise regeneration and provide supporting economic growth. The Leisure Quarter is located within Blackpool Town Centre and the Council sets out in Policy CS17 of the Core Strategy that it aims to strengthen the town centre as a cultural, leisure and business destination for residents and visitors. The Framework emphasises that planning policies should be positive and promote competitive town centre environments. In the Council's opinion, the modification to CS20 provides an element of protection for existing uses and attractions, whilst providing a positive policy framework for future development of this key site, which is fully in accordance with national policy in the Framework. Therefore, the Council considers the modification to be sound.