1.0 INTRODUCTION

1.1 This Paper outlines the Council’s response to the Sustainability Appraisal (SA) undertaken by Hyder Consulting (UK) Ltd for the Blackpool Core Strategy Proposed Submission. It summarises the SA recommendations and identifies changes made to the document where appropriate. Where the Council does not consider changes are necessary this is justified.

2.0 SA RECOMMENDATIONS / COUNCIL RESPONSE

Spatial Objectives

2.1 No specific recommendations are made to change the Strategic Objectives, as it is felt they offer a strong basis for the future development of Blackpool and the accompanying Spatial Strategy and policy framework.

Spatial Strategy

2.2 The following measures are recommended to improve the sustainability performance of the Spatial Strategy and its implementation:

- In addition, development to the south of Blackpool should be directed in a way that complements the existing town centre and resort, providing additional jobs in the process. There should be a link between any extension and the town centre, which will avoid any feeling of isolation on the edge of the town. Community cohesion with residents of the neighbouring borough of Fylde could also be encouraged.

Response: The supporting text to Policy CS1 Spatial Strategy specifically makes reference to the opportunity in south Blackpool that exists to provide for sustainable development with improved choice in quality new jobs and homes in sustainable locations closely integrated with the surrounding area. Other policies in the plan address issues of employment (CS24 South Blackpool Employment Growth) and transport connections (CS27 South Blackpool Transport and Connectivity) promoting rapid transport connections between South Blackpool and the Town Centre and employment sites. Furthermore, policies relating to South Blackpool are underpinned by objective 21 which specifically refers to the necessary infrastructure to integrate new sustainable development including convenient access, services and community facilities. As the Core Strategy policies will be read as a whole and not in isolation it is not considered necessary to repeat these issues in Policy CS1.
In addition through the Duty to Co-operate Blackpool Council is working very closely with neighbouring authorities and Lancashire County Council over the future development of lands on the Blackpool/Fylde boundary to ensure that any proposed development supports the strategic objectives of each of the Fylde Coast Authorities’ local plans and delivers the necessary supporting infrastructure to deliver a strong and distinctive sustainable urban extension to Blackpool closely integrated with the surrounding area. This is acknowledged in the introductory text to Chapter 8 of the Core Strategy.

- It is recommended that Policy CS1 is strengthened to specifically note that development to the south of Blackpool would be supported by services etc that meet the local needs.

  Response: The focus of Part 1 of Policy CS12: Sustainable Neighbourhoods is to ensure future development and investment contributes to delivering sustainable communities, including the provision of services and community facilities. New development in south Blackpool will have to meet the requirements of this policy as appropriate. It is considered that the issue raised is adequately covered by Policy CS12.

- New employers should be encouraged to provide apprenticeships and training opportunities to help improve the skills levels of the Blackpool population.

  Response: Developing and delivering an effective skills agenda to equip Blackpool’s people with the appropriate skills is included within Policy CS3: Economic Development and Employment, which will be read in conjunction with all other policies. Also, the supporting text acknowledges a Local Economy Action Plan being developed to deliver this skills agenda. It is considered that the issue raised is adequately covered by Policy CS3.

- Ensure that landscape and visual assessments are prepared for any future sustainable extension in South Blackpool.

  Response: Through the Duty to Co-operate Blackpool Council is working very closely with neighbouring authorities and Lancashire County Council over the future development of lands on the Blackpool/Fylde boundary to deliver a strong and distinctive sustainable urban extension to Blackpool closely integrated with the surrounding area. Issues of landscape and visual assessment are/will be part of that process. In addition any major urban extension would require an Environmental Impact Assessment which would include landscape and visual amenity assessments. Further detail on such requirements will be included in the Site Allocations and Development Management Policies document (Part 2 of the Local Plan).

- It is essential that any development should be focussed away from the flood risk areas. New development should not result in increased flood risk.

  Response: Flood risk issues are covered by Policy CS9: Water Management. As the Core Strategy policies will be read as a whole and not in isolation it is not considered necessary to repeat these issues under Policy CS1. The Council has worked closely with the Environment Agency and United Utilities in developing the spatial strategy and policies to ensure that issues relating to flood risk have been appropriately identified and addressed. Furthermore, reference is made to flood and surface water management in the accompanying Infrastructure and Delivery Plan.
New developments should be encouraged to achieve challenging re-use and recycling targets.

_Response: Re-use and recycling issues are addressed by policy in the Joint Lancashire Minerals and Waste Local Plan Core Strategy (2009) which forms part of the Development Plan for Blackpool. It is therefore not considered necessary to include this issue in policy CS1._

**Core Policies**

2.3 No modifications have been suggested to improve the sustainability performance of the policy.

**Strengthening Community Wellbeing**

2.4 The following measures are recommended to improve the sustainability performance of the policies and their implementation:

- Although impacts were assessed as neutral with regard to pitch provision Policy CS16 may benefit from including specific reference to stating Brownfield land will be preferable over Greenfield land for additional pitch provision.

  _Response: Policy CS16 now includes a reference to the preference for sites for additional pitch provision to be located on brownfield (previously developed land) over greenfield land where possible._

**Regenerating Blackpool Town Centre and Resort Core**

2.5 The following measures are recommended to improve the sustainability performance of the policies and their implementation:

- It is important to ensure a mix of facilities are provided that meets the needs of local residents as well as visitors. This would ensure that Blackpool has a year round vibrancy.

  _Response: There are various references in the Core Strategy to providing for the needs of local residents alongside visitors to the town and the issue of developing a year round vibrancy. The role of the town for local residents in the sub-region is embedded in the Spatial Vision and Objectives and specifically acknowledged in Policy CS17 Blackpool Town Centre. It is not considered necessary to therefore include any modifications to policies in this chapter._

- Well planned, sensitive designs should be promoted within new development in order to protect and enhance heritage resources.

  _Response: It is considered that this issue is adequately covered in policies CS7: Quality of Design and CS8: Heritage. As the Core Strategy policies will be read as a whole and not in isolation it is not considered necessary to make amendments to policies in this chapter._

- It will be important for effects on the Air Quality Management Area (AQMA) to be assessed as part of planning applications particularly for major developments such as those planned at the Leisure Quarter.
Response: Air quality issues are covered by ‘saved policy’ in the adopted Local Plan (2006) - BH4 Public Health and Safety. This policy will continue to be saved until such time it is replaced by the Site Allocations and Development Management Policies document (Part 2 of the Local Plan).

- Strategies for parking provision need to be carefully considered for all developments in the town centre and transport assessments need to accompany all planning applications to ensure that the individual and cumulative effects of the development are understood and appropriately mitigated. Developing cycling links as part of the new developments could also be addressed in the policies.

Response: Parking issues in the town centre and provision for cycling are specifically covered by Policy CS5: Connectivity. In addition ‘saved policies’ in the adopted Local Plan (2006)(Policy AS1: General Development Requirements and Policy AS2: New Development with Significant Transport Requirements), set out access requirements for new development and where transport assessments are required respectively. These policies will continue to be saved until subsequently replaced by the Site Allocations and Development Management Policies document (Part 2 of the Local Plan).

- Whilst the quality of design is addressed in other parts of the Core Strategy there is scope for the accommodation policies to promote innovative design – there may be scope to cross reference the design policies as the promenade has to be a flagship ‘centrepiece’ for the resort.

Response: The requirement for high quality visitor accommodation is inherent in Policy CS21: Leisure and Business Tourism and Policy CS23: Managing Holiday Bed Spaces. As the Core Strategy policies will be read as a whole and not in isolation it is not considered necessary to make a cross reference in the accommodation policies in this chapter to Policy CS7: Quality of Design.

Enabling South Blackpool Growth and Enhancement

2.6 The following modifications could be made to the policies to improve their sustainability performance:

- Reducing infiltration and increasing runoff across South Blackpool may have an impact on surface and sub-surface waterbodies, although more information would be needed to quantify this impact. A full assessment would need to be undertaken prior to development. Proposals to incorporate SuDS into design would help to mitigate these impacts.

Response: A separate policy on Water Management (Policy CS9) has been developed as part of the Proposed Submission Core Strategy which refers to the need to incorporate mitigation and resilience measures to minimise the risk and impact of flooding from all sources and the need to incorporate SuDs as part of development where surface water runoff will be generated. The Council has worked closely with the Environment Agency and United Utilities in developing the South Blackpool policies to ensure that issues relating to flood risk have been appropriately identified and addressed. Furthermore, reference is made to flood and surface water management in the accompanying Infrastructure and Delivery Plan.