

# Summary of Representations to the Proposed Submission Core Strategy

## Regulation 22 (1) (c) (v) Statement

November 2014

Blackpool Council



# Summary of Representations to the Proposed Submission Core Strategy

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# Summary of Representations to the Proposed Submission Core Strategy

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## 1 Consultation Procedure for the Proposed Submission (Regulation 19) Core Strategy

1.1 The purpose of this document is to fulfil Regulation 22 (1) (c) (v) of the Town and Country Planning (Local Development) (England) Regulations 2012, by providing a summary of the representations made pursuant to Regulation 20 (i.e. those made at the Proposed Submission stage).

1.2 This document does not detail those representations made at earlier Core Strategy consultation stages, which are set out in a separate Statement of Consultation (April 2014). This was made available on the Council's website at the Proposed Submission consultation stage.

1.3 Consultation on the Proposed Submission (Regulation 19) Core Strategy ran for eight weeks from Friday 4<sup>th</sup> July to Friday 29<sup>th</sup> August 2014.

1.4 The consultation documents (i.e. the Proposed Submission Core Strategy, Sustainability Appraisal, Proposed Submission Policies Maps, Statement of Consultation and Statement of Representations Procedure) and other supporting documents were made available in accordance with the Regulations and the Council's Statement of Community Involvement. Anyone wishing to respond was asked to state whether they considered the Plan to be legally compliant and sound.

1.5 Blackpool Council provided the opportunity for any organisations/individuals (including statutory bodies, key stakeholders and members of the public) to submit representations on the Proposed Submission and supporting documents by:

- Making hard copies of the consultation documents, representation form and guidance notes on making representations available at all eight libraries in the Borough (Central, Moor Park, Anchorsholme, Palatine, Revoe, Mereside, Boundary and Layton) and at the main Council offices (Municipal Buildings) for the duration of the consultation;

- Publishing the consultation documents, representation form, guidance notes on making representations and all supporting documents on the Council's website ([www.blackpool.gov.uk/corestrategy](http://www.blackpool.gov.uk/corestrategy)) as well as a link to the Council's on-line consultation portal (Objective) ([www.consult.blackpool.gov.uk](http://www.consult.blackpool.gov.uk));
- Notifying around 1340 bodies, groups and individuals on the Local Plan consultation database by letter or email (this includes specific and general consultation bodies as set out in the Regulations and individuals/organisations who had previously responded to earlier Core Strategy consultation stages);
- Displaying a public notice in the Blackpool Gazette.

1.6 Appendix A provides evidence of the Proposed Submission consultation including a list of statutory and general consultees notified, copies of the letter/email sent, public notice and the Core Strategy web page.

# Summary of Representations to the Proposed Submission Core Strategy

## 2 Overview of the Consultation Responses

2.1 The Council received **28** responses to the Proposed Submission Core Strategy from statutory (specific) consultees, general consultees, developers, agents and other individuals including residents and local businesses. These responses generated **143** representations in total on different aspects of the Core Strategy and supporting documents.

2.2 Section 3 of this document sets out summary tables which list those individuals/organisations that submitted responses to the (Regulation 20) consultation and summarise the representations made (presented in the same order as the Plan) together with the Council's response. Some representations have resulted in the need to suggest minor modifications, which are set out in the separate **Schedule of Proposed Minor Modifications** document.

**Table 1: List of Respondents**

1	Environment Agency
2	Ribble Valley
3	LCC Archaeology (Lancashire County Council)
4	Fylde Borough Council
5	Theatres Trust
6	Chadsley Hotel
7	Memphis Hotel
8	Mr Malcolm Hicks
9	Wyre Borough Council
10	South Ribble Borough Council
11	Mr Richard Panek
12	Westby With Plumpton's Parish Council
13	Mrs Kathryn Rooney
14	CW Planning Solutions
15	The Wescoe Hotel
16	The Trees Residents Association
17	English Heritage
18	Home Builders Federation
19	Woodland Trust
20	Natural England
21	The Wildlife Trust for Lancashire, Manchester & North Merseyside
22	Bourne Leisure
23	NSI & Rowland Homes
24	Co-operative Group
25	Lancaster City Council
26	Homes and Communities Agency
27	United Utilities
28	Blackpool Pleasure Beach

## Summary of Representations to the Proposed Submission Core Strategy

### 3 Summary of Issues Raised

3.1 The following section sets out a summary table of the responses received by each individual/organisation (Table 2). Summary tables of the individual representations made grouped by Plan order along with the Council's response are also available in Appendix B.

**Table 2: List of Individuals/Organisations who responded with an overview of their Representation(s)**

Respondent	Overview of Representation(s)
<b>Statutory (Specific) Consultees</b>	
Environment Agency	Duty to Co-operate has been met; legal and procedural requirements have been complied with; the Core Strategy has been prepared in accordance with the NPPF.
Fylde Borough Council	<p>(1) Policy CS6 and para 2.37 (bullet 7) – clarification sought on Green Belt boundary.</p> <p>(2) Para 5.52 – clarification sought with respect to comparison floor space figure.</p> <p>(3) Paras 8.3 and 8.7 – request to reflect the Duty to Co-operate Memorandum of Understanding wording more closely.</p> <p>(4) General comment – clarification sought with respect to referring to lands close to J4 of the M55 and being more specific about Blackpool's dependency on the allocation/ development of lands in Fylde.</p> <p>(5) Figure 18 - clarification sought on the employment land allocation at Whitehills.</p> <p>(6) Para 8.16 – request to reflect the wording used in the emerging Fylde Local Plan with regards to provision of Blackpool's shortfall in employment land in Fylde.</p> <p>(7-12) Sustainability Appraisal - clarification sought on various points.</p> <p>(13-19) Infrastructure Delivery Plan - clarification sought on various points.</p>
Wyre Borough Council	<p>(1) Policy CS2: Housing Provision – clarification sought with respect to the figure.</p> <p>(2) Para 5.52 - clarification sought with respect to comparison floor space figure.</p> <p>(3) Policy CS6: Green Infrastructure – support with respect to Green Belt.</p> <p>(4) Para 6.55 – some subjectivity which does not reflect the Lancashire GTAA (2007).</p> <p>(5) Policy CS24: South Blackpool Employment Growth - any proposals should not undermine the established Hillhouse International Business Park.</p>
English Heritage	<p>(1) Evidence base – unsound, lacks sufficient evidence on the historic environment.</p> <p>(2) Ch2: Spatial Portrait – unsound, requires detail on the built heritage in the town.</p> <p>(3) Para 2.23 – unsound, needs a more positive description of the built environment.</p> <p>(4) Para 2.23 – unsound, list of heritage assets is inaccurate.</p>

## Summary of Representations to the Proposed Submission Core Strategy

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- (5) Para 2.37, bullet 6 – unsound, no priority issue for the historic environment.
- (6) Vision – unsound, with respect to the long term conservation and enhancement of the historic environment.
- (7) Goal 1, Bullet 5 – unsound, welcome this objective but the plan needs to do more to identify Blackpool’s ‘rich’ heritage to inform this objective.
- (8) Goal 3, Bullet 14 – unsound, reference to heritage is supported but the Plan does little to support this objective.
- (9) Para 5.52 – unsound, any proposals for the Winter Gardens should be in line with the Conservation Management Plan. Would not support a retail use scheme.
- (10) Policy CS6: Green Infrastructure – unsound, nothing place specific on how this should be applied locally. No mention of the 2 conservation areas and Stanley Park.
- (11) Para 5.96 – unsound, Stanley Park is a Grade 2\* listed Park.
- (12) Policy CS8: Heritage – unsound, welcome a specific heritage policy although it does not address how the presumption in favour of sustainable development should be applied locally. Generic policy which does not detail Blackpool’s priorities. Does not accord with NPPF with respect to conserving / enhancing the significance of the historic environment.
- (13) Policy CS8: Heritage – unsound, need a strategy for the later 20th Century buildings.
- (14) Policy CS8: Heritage, part 1 – unsound, unclear what the aspirations for the town are. Wording does not reflect requirements of the NPPF.
- (15) Policy CS8: Heritage, part 2 - unsound, question if this should be in Part 2 of the Local Plan; even so, does little to support NPPF or reflect Blackpool’s uniqueness.
- (16) Policy CS8: Heritage, part 3 – unsound, a development management policy which does not have regard to NPPF (in relation to the significance of heritage assets and the need to conserve and enhance and minimise harm).
- (17) Policy CS8: Heritage, part 4 – unsound, does not provide adequate protection to the historic environment / a strong position in using ‘seek to safeguard’.
- (18) Policy CS8: Heritage, part 5 – unsound, welcomes local list reference although no strategy for its use and implementation. Request reference to heritage strategy.
- (19) Policy CS10: Sustainable Design and Renewable and Low Carbon Energy – unsound, no reference to the historic environment.
- (20) Policy CS11: Planning Obligations – unsound, opportunity for obligations to also enhance buildings ‘at Risk’ and no reference to the historic environment.
- (21) Policy CS12: Sustainable Neighbourhoods – unsound, welcome part 1e but does

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	<p>not accord with requirements of the NPPF.</p> <p>(22) Policy CS16: Traveller Sites – unsound, no reference to the historic environment.</p> <p>(23) Policy CS17: Blackpool Town Centre, part 1c - unsound, does not accord with the requirements of NPPF on conservation and enhancement.</p> <p>(24) Policy CS17: Blackpool Town Centre, part 1e – sound.</p> <p>(25) Policy CS17: Blackpool Town Centre, part 1g – clarification on ‘high quality’; need a strategy for Victorian properties that contribute to the historic environment.</p> <p>(26) Para 7.5 – unsound, would not support a scheme for retail at the heart of the regeneration of the Winter Gardens (complementary only)</p> <p>(27) Policy CS18: Winter Gardens, part 2 – unsound, does not accord with the NPPF; no reference to the Conservation Management Plan for the Winter Gardens.</p> <p>(28) Policy CS18: Winter Gardens – unsound, no reference to the building being on the ‘at Risk register’ (and ensuring it is not by the end of the Plan period).</p> <p>(29) Paras 7.12 and 7.13 - unsound, additional wording sought for the Winter Gardens to be self-sustaining financially and clarification sought on its description.</p> <p>(30) Policy CS20: Leisure Quarter – unsound, welcome policy although no mention of Blackpool Tower (here / the Plan as a whole), the piers and other leisure uses.</p> <p>(31) Policy CS20: Leisure Quarter, part 2a – sound.</p> <p>(32) Policy CS21: Leisure and Business Tourism – unsound, fails to recognise the importance of the historic environment in supporting the town’s economy (NPPF) and in ensuring its status as a top seaside resort with its leisure and tourism offer.</p> <p>(33-41) Sustainability Appraisal - disagree with various conclusions on policy impacts.</p>
Natural England	<p>(1) Unable to advise if the Plan is sound or legally compliant at this time, until an assessment on the likely effects of all development in the Neighbourhood Plan area has been carried out to ensure no significant adverse affects on European Sites.</p> <p>(2) Habitat Regulations Assessment - suggest further assessment on the disturbance of Annex 1 bird foraging sites, mitigation measures and how these will be secured (with a site specific policy for Whyndyke and other relevant allocations).</p> <p>(3) Policy CS6: Green Infrastructure - general support, however too broad to provide guidance about measures needed to address the effects of recreation on the SPA.</p> <p>(4) Sustainability Appraisal - agree with the conclusions. Note some unresolved uncertainties; the negative and uncertain effects should be explored further.</p>
Homes and Communities	<p>(1) General support to the strategic approach in the Plan.</p> <p>(2) Policy CS2: Housing Provision – support main sources for housing delivery.</p>

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Agency (HCA)	<p>(3) Policy CS3: Economic Development and Employment – support Town Centre focus and emphasis on South Blackpool also.</p> <p>(4) Policy CS12: Sustainable Neighbourhoods – support for Council projects.</p> <p>(5) Policy CS17: Blackpool Town Centre, CS18: Winter Gardens, CS19: Central Business District and CS20: Leisure Quarter – reference to joint working.</p>
United Utilities (UU)	<p>(1) General comments on continuing joint working and developing detailed development management policies.</p> <p>(2) Policy CS9: Water Management – request amendment to 1.e with respect to surface water discharge.</p> <p>(3) Paras 5.142- 5.143 – welcome 5.143; suggest additional text with respect to mitigating surface water run-off.</p> <p>(4) Policy CS11: Planning Obligations – request specific policy in relation to local infrastructure provision or additional wording to Policy CS11.</p> <p>(5) Policy CS25: South Blackpool Housing Growth – request amendment to part 2 with respect to managing the impact.</p> <p>(6) Para 8.21 – recommend additional text in light of the limitations associated with the existing infrastructure provision in the area.</p>
Westby with Plumpton Parish Council	<p>Not supportive of further development within the Westby with Plumpton parish especially Whyndyke. In the event of any proposed development, the effects on the parish area including flooding and highways impact must be considered. Consideration should be made to brownfield sites which would negate the need to encroach into other parishes.</p>
<b>Other Special Interest Groups</b>	
Ribble Valley Borough Council	Does not wish to make any specific representations.
Lancashire County Council (Archaeology)	Does not wish to raise any objections. Suggest a glossary of terms.
South Ribble Borough Council	All policies considered legally compliant; compliant with the Duty to Co-operate and sound.
Lancaster City Council	<p>(1) Para 5.7 (housing provision) – concern, opting to no longer cater for the needs of housing benefit claimants means this need will have to be addressed elsewhere. Compliant with the Duty to Co-operate.</p> <p>(2) Paras 7.10-7.11 (economic development and employment) – no objection to the positive policy position on duty to co-operate grounds, but there may be a conflict in objectives if seeking to establish a joined-up strategic approach to housing and</p>

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	employment needs. Compliant with the Duty to Co-operate.
Home Builders Federation	<p>(1) Approach to producing multiple planning documents is unsound as it is not consistent with national policy.</p> <p>(2) The plan period ends in 2027 which will not provide a 15 year time horizon post adoption, contrary to national policy, therefore the plan is unsound.</p> <p>(3) The Sustainability Appraisal has not considered the outputs from the SHMA (specifically the impacts of the objectively assessed need scenarios proposed).</p> <p>(4) Unconvinced that the duty to co-operate has been adequately discharged in relation to housing (need a discussion on the regional shortfalls with neighbouring authorities and how these are to be met).</p> <p>(5) Policy CS2: Housing Provision and paras 5.1 to 5.22 – policy wording, objectively assessed housing needs, components of supply and phasing considered unsound as they are not positively prepared, justified by the evidence or effective.</p> <p>(6) Policy CS10: Sustainable Design, Renewable and Low Carbon Energy – policy unsound as contrary to national policy.</p> <p>(7) Policy CS13: Housing Mix, Density and Standards – policy considered unsound as not effective or justified.</p> <p>(8) Policy CS14: Affordable Housing – policy unsound as not consistent with national policy or justified by the evidence (with respect to thresholds and targets).</p>
The Theatres Trust	<p>(1) Policy CS17: Blackpool Town Centre – unsound, not effective or consistent with national policy with respect to paras 70 + 125 of the NPPF and protection of existing cultural facilities. Also fails to mention evening economy. Suggest modifications.</p> <p>(2) Policy CS18: Winter Gardens - unsound, not effective or consistent with national policy with respect to failing to protect the existing theatre and cultural uses.</p>
The Trees Residents Association	General support for document. Difficult to see the Core Strategy preventing imminent decline in the neighbourhood. Welcome various heritage references.
Woodland Trust	<p>(1) Policy CS6: Green Infrastructure – legally compliant, compliant with the Duty to Co-operate, unsound (not consistent with national policy with respect to protection of ancient woodland/trees).</p> <p>(2) Paras 5.103 + 5.104 - legally compliant, compliant with the Duty to Co-operate, unsound (not justified with respect to evidence on shortage of woodland).</p>
Wildlife Trust for Lancashire, Manchester and North	<p>(1) Para 5.112 – legally compliant, compliant with the Duty to Co-operate, sound.</p> <p>(2) Policy CS7: Quality of Design, part 1 - legally compliant, compliant with the Duty to Co-operate, unsound (not effective, no reference to the natural environment,</p>

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Merseyside	biodiversity or ecological networks).  (3) Policy CS7: Quality of Design, part 2 - legally compliant, compliant with the Duty to Co-operate, unsound (not effective, same reasons as above).
<b>Developers, Agents and Other Individuals (including residents and local businesses)</b>	
Mr Stanley	Policy CS23: Managing Holiday Bed Spaces – not compliant with the Duty to Co-operate or justified with respect to Palatine Road currently being identified within a holiday accommodation area.
Mr Johnson	Policy CS23: Managing Holiday Bed Spaces – not compliant with the Duty to Co-operate or justified with respect to Palatine Road currently being identified within a holiday accommodation area.
Mr Hicks	Request for information about public transport.
Mr Panek	Policy CS23: Managing Holiday Bed Spaces – not compliant with the Duty to Co-operate or justified with respect to Palatine Road currently being identified within a holiday accommodation area.
Mrs Rooney	Policy CS26: Marton Moss - legally compliant, compliant with the Duty to Co-operate, unsound (not justified – too restrictive on small-scale development).
Mr Chris Weetman	Policy CS26: Marton Moss (parts 1 + 2) – considered unsound as at odds with Para 55 of the NPPF. A comprehensive Neighbourhood Plan prevents small-scale development. Suggest modifications.
Angela McClelland	General support for document – comments made with respect to tourism, holiday bed spaces and holding events in the town.
Bourne Leisure (submitted by Nathaniel Lichfield & Partners)	(1) Spatial Portrait - legally compliant, compliant with the Duty to Co-operate, unsound (not consistent with national policy, support should be given throughout the Plan to the enhancement of existing tourism accommodation and facilities).  (2) Vision - legally compliant, compliant with the Duty to Co-operate, unsound (not consistent with national policy). Support the Vision but more recognition should be given to Blackpool as the main tourism centre for the Fylde Coast and the significant contribution that visitor accommodation/other facilities make to the local economy.  (3) Goal 3 Objective 14 - legally compliant, compliant with the Duty to Co-operate, unsound (not consistent with national policy). Support the objective but important for policy to support the enhancement of existing tourism accommodation and facilities, as well as new facilities, both within and outside the resort core.  (4) Key Diagram - legally compliant, compliant with the Duty to Co-operate, sound (pleased to note amendments made).  (5) Policy CS1: Strategic Location of Development - legally compliant, compliant with

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	<p>the Duty to Co-operate, unsound (not positively prepared or consistent with national policy). Object to the policy as no recognition to the importance of the tourism offer outside the Resort Core. Also object to para 4.7 as the enhancement and expansion of tourism accommodation/facilities elsewhere should be encouraged.</p> <p>(6) Policy CS5: Connectivity - legally compliant, compliant with the Duty to Co-operate, unsound (not consistent with national policy). Request reference to private car for tourist developments in remote/rural areas.</p> <p>(7) Policy CS6: Green Infrastructure - legally compliant, compliant with the Duty to Co-operate, unsound (not consistent with national policy). Support for the policy but the supporting text should reflect the need to balance the economic and social objectives for the area with environmental matters; and give consideration to the significance of the site/adjointing area in terms of landscape and ecological value.</p> <p>(8) Policy CS21: Leisure and Business Tourism – legally compliant, compliant with Duty to Co-operate, unsound (not positively prepared or consistent with national policy). Object to focus on the town centre, resort core and holiday accommodation areas – should support tourism elsewhere and support existing tourism operators.</p> <p>(9) Policy CS24: South Blackpool Employment Growth - legally compliant, compliant with the Duty to Co-operate, sound.</p>
<p>NS&amp;I / Rowland Homes (submitted by JLL)</p>	<p>(1) Spatial Portrait – unsound, request additional reference to office market, effects of demographic situation and housing market.</p> <p>(2) Vision – sound, general support. Request additional reference to quality housing.</p> <p>(3) Policy CS1: Strategic Location of Development – unsound, the spatial strategy is supported although it should recognise that a wide choice of suitable sites for housing and employment should be provided elsewhere.</p> <p>(4) Policy CS2: Housing Provision – unsound (not effective). Should have regard to the 2012 based SNP; the need for economic growth and quality homes to rebalance the housing market; and commit to a policy review in the event of under-delivery.</p> <p>(5) Policy CS3: Economic Development and Employment – unsound (not effective). Object to the NS&amp;I site as a location for economic growth and employment.</p> <p>(6) Policy CS9: Water Management – sound, changes made are supported</p> <p>(7) Policy CS24: South Blackpool Employment Growth – unsound (not effective). Inclusion of NS&amp;I site underpinned by an out-of-date evidence base.</p> <p>(8) Policy CS25: South Blackpool Housing Growth – unsound. Should identify sites with potential for redevelopment (housing or mixed use development) and identify the NS&amp;I site as a mixed use site.</p> <p>(9) Figure 10: Key Diagram – not legally compliant with respect to the identification</p>

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	<p>of the NS&amp;I site as a location for employment.</p> <p>(10) Figure 7: Existing Green Infrastructure – unsound. The NS&amp;I site is identified as Open Land Meeting Community and Recreational Need.</p>
The Co-operative Group	<p>(1) Map Reference Co-op Sports Club and Fields – legally compliant, compliant with the Duty to Co-operate, unsound (not positively prepared, justified or consistent with national policy in continuing to allocate the site as <i>Playing Fields and Sports Ground</i>). Request re-allocation to housing.</p> <p>(2) Policy CS2: Housing Provision and Para 5.17 – sound, support the allowance made for windfall within the housing land supply figures.</p> <p>(3) Policy CS6: Green Infrastructure - legally compliant, compliant with the Duty to Co-operate, unsound (not positively prepared or justified with respect to the protection of existing open space, sports and recreational buildings and land).</p>
Blackpool Pleasure Beach (submitted by RPS Planning & Development)	<p>(1) Goal 3, Objective 15 – legally compliant, compliant with the Duty to Co-operate, unsound (not effective or positively prepared with respect to directing retail, tourism and leisure uses to the town centre and not also along the seafront in the Resort Core; this does not support the future requirements of the Pleasure Beach).</p> <p>(2) Policy CS4: Retail and Other Town Centre Uses - legally compliant, compliant with the Duty to Co-operate, unsound (part 3 of the policy not effective in requiring new retail and other town centre uses along the Resort Core seafront to meet a number of criteria; parts 1 + 3 of the policy not positively prepared as they do not support the development requirements of leisure, entertainment and tourism operators in the Resort Core).</p> <p>(3) Policy CS5: Connectivity – legally compliant, compliant with the Duty to Co-operate and sound (support the policy amendments made).</p> <p>(4) Policy CS12: Sustainable Neighbourhoods - legally compliant, compliant with the Duty to Co-operate and sound.</p> <p>(5) Policy CS20: Leisure Quarter - legally compliant, compliant with the Duty to Co-operate, unsound (not justified). Request additional guidance on what will not be acceptable on the site to protect the Pleasure Beach.</p> <p>(6) Policy CS21: Leisure and Business Tourism - legally compliant, compliant with the Duty to Co-operate and sound.</p> <p>(7) Policy CS22: Key Resort Gateways - legally compliant, compliant with the Duty to Co-operate, unsound (not justified). Welcome a number of changes although the need to protect existing parking levels has not been dealt with satisfactorily.</p> <p>(8) Para 5.134 - legally compliant, compliant with the Duty to Co-operate, unsound (not justified). Needs updating to reflect the current regulations on Bathing Water.</p>

## APPENDIX A: EVIDENCE OF REGULATION 19 CONSULTATION

### Specific (Statutory) and General Consultees notified of the Proposed Submission Core Strategy consultation

Specific (Statutory) Consultees	
Wyre Borough Council	Highways Agency
Fylde Borough Council	Homes and Communities Agency
Lancashire County Council	Marine Management Organisation
Westby-with-Plumpton Parish Council	Network Rail
Staining Parish Council	Coal Authority
St Annes Parish Council	Blackpool Clinical Commissioning Group
British Gas Properties	NHS England
United Utilities	T Mobile
National Grid	Vodafone
Electricity North West	o2
English Heritage	Orange UK Plc
Natural England	Lancashire Police and Crime Commissioner
Environment Agency	BT Group Plc, Regional Manager North West
Co-Operative Group Ltd	

#### General Consultees

##### Elected Representatives

Blackpool North MP  
 Blackpool South MP  
 European MPs  
 Blackpool Councillors

##### Bodies representing Disabled People

Fylde & Wyre Society for the Blind  
 Motor Neurone Equalities Forum  
 Leonard Cheshire Northwest Region  
 Princess Alexandra Home for the Blind  
 Blackpool Society for the Mentally Handicapped  
 Blackpool, Fylde and Wyre MIND  
 Blackpool, Fylde and Wyre Society for the Deaf  
 Fibromyalgia Support Group  
 RNIB  
 Action for Better Access in Blackpool

##### Voluntary Bodies

Council for Voluntary Services  
 Barnados Blackpool Project  
 Blackpool SURF  
 Community Futures  
 Blackpool Friends of Kingscote Park  
 Blackpool & Fylde Rail Users Association  
 Friends of the Grand  
 Action for Better Access  
 Country Land and Business Association (CLA)

##### Transport

Blackpool Transport Ltd  
 First Northwestern  
 Northern Rail  
 Virgin Trains (North West Region)  
 Sustrans  
 Better Transport

##### Youth Groups, Schools and Colleges

Blackpool Young Peoples Council & Blackpool Voice  
 Blackpool & Fylde College  
 Blackpool Sixth Form College  
 Blackpool Scouts Service Team

##### Businesses/Business Groups

Business Link Lancashire  
 Federation of Small Businesses  
 Lancashire Economic Partnership  
 Blackpool Self-Catering Association  
 Stay Blackpool  
 Lancashire and Blackpool Tourist Board  
 Blackpool Fylde & Wyre Trades Union Council  
 North & Western Lancashire Chamber of Commerce  
 The Mersey Partnership  
 Blackpool BID  
 Town Centre Manager  
 Dale Street Market Manager  
 Blackpool Chamber of Trade  
 Blackpool Major Retailers Consortium

Citizens Advice Bureau  
Blackpool Airport  
RealTimeUK North  
King Street Dental Surgery  
In the Pink Leisure  
CL Edwards & Sons Ltd  
Blackpool Licensed Taxi Operators Assoc.  
Tesco  
Progress Recruitment  
Ubiquis  
Relate Lancashire  
Blackpool Holiday Trades Association  
Blackpool Combined Association  
Blackpool Connexions  
Morrison Supermarkets PLC  
Noble Organisation  
Warburtons Fylde Ltd  
C Cabs  
Moorland Motors Ltd  
Seafood Restaurant  
Bestplate Ltd  
Chelsom Ltd  
Gilberts (Blackpool) Ltd  
Blackpool Moneyline IPS Ltd  
Advice Link  
Bourne Leisure  
Blackpool Football Club  
Job Centre Plus Blackpool  
Blackpool Airport  
Blackpool Gazette  
Campaign for Real Ale (CAMRA)  
Martin Yates Independent Living Services  
Blackpool Pleasure Beach  
Leisure Parcs  
Carers UK  
Beneast Training Ltd  
Blackpool Accommodation for Gays (BAGs)  
Bispham Hotel & Traders Association  
Blackpool Self Catering Holiday Association  
Noble  
Glasdon Group LTD  
Silcock Leisure  
Morris Homes (North) Limited  
Persimmon Homes Lancashire  
Redrow Homes (Lancashire) Ltd  
Royal Mail  
Blackpool Accommodation for Gays (BAGs)  
Allitt Estate Agents  
LS Retail Warehousing

### **Conservation, Preservation & Amenity**

Blackpool Civic Trust  
CPRE  
Council for the Protection of Rural England  
Lancashire Wildlife Trust  
RSPB

National Playing Fields Association  
Sustainability North West (SNW)  
Theatres Trust  
The Woodland Trust  
Lancashire Wildlife Trust  
Fylde Bird Club  
Blackpool Environmental Action Team (BEAT)  
Blackpool & Fylde Conservation Volunteers  
Blackpool & Fylde Friends of the Earth  
Fylde Coast Bridleways Assoc.  
Fylde Coast Cycling Action Group  
Ramblers Association  
RSPB  
Sport England  
Victorian Society  
20th Century Society

### **Government Departments**

DEFRA  
Department for Transport

### **Religious/Ethnic Groups**

Faith Forum  
National Federation of Gypsy Liaison Groups  
Blackpool Congregation of Jehovah's Witnesses

### **Other**

Lancashire Constabulary  
Lancashire Fire & Rescue Service HQ  
Blackpool Coastal Housing  
Bloomfield East Residents Association  
Beneast Training Ltd  
Bispham Hotel & Traders Association  
Bsafe Blackpool  
Central Drive Community Association  
Claremont 10 Streets  
Reads Avenue Cluster Group  
Blackpool Coastal Housing  
Muir Group Housing Association  
Great Places Housing Association  
Places for People Housing Association  
Regenda Group  
ING Real Estate Investment Management  
Mobile Operators Association  
Mono Consultants Ltd  
Anchor Trust

Date: 4<sup>th</sup> July 2014

Our Ref: CSPS  
Tel: 01253 476267  
Email: [development.plans@blackpool.gov.uk](mailto:development.plans@blackpool.gov.uk)

Dear Sir/Madam

**BLACKPOOL LOCAL PLAN**  
**PART 1: CORE STRATEGY – PROPOSED SUBMISSION (JUNE 2014)**

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Representations are invited on the **Blackpool Core Strategy – Proposed Submission**, which the Council intends to submit to the Secretary of State for Examination.

The Core Strategy is a key planning document for Blackpool and sets out where new development including housing, employment, retail and leisure should be located to meet Blackpool's future needs to 2027. It identifies areas which will be regenerated, protected or enhanced and sets out key development principles such as design and affordable housing. The Core Strategy will be used to determine planning applications and priorities for the Borough over the next 15 years.

**What should representations relate to?** The purpose of the examination is to consider whether the Core Strategy is legally compliant, satisfies the Duty to Co-operate and meets the tests of soundness. Further information on this can be found in the Guidance Note on the Council's Core Strategy webpage.

**Consultation is taking place from Friday 4<sup>th</sup> July 2014 to 5pm Friday 29<sup>th</sup> August 2014**

The Proposed Submission and other supporting documents are available to view and comment on at:

**[www.blackpool.gov.uk/corestrategy](http://www.blackpool.gov.uk/corestrategy)**

The Core Strategy Proposed Submission, Policies Maps, Sustainability Appraisal and Statement of Consultation are also available to view during normal opening hours at:

- Customer First Centre, Municipal Buildings, Corporation Street, Blackpool, FY1 1NF
- All libraries across the Borough

Further details can be found in the Statement of Representations Procedure on the Core Strategy webpage.

The Council is also consulting on the **draft Statement of Community Involvement (SCI)** over the same time period. This document sets out how and when the community and other stakeholders will be consulted on the preparation and revision of planning documents that make up the Blackpool Local Plan and how the community will be consulted on planning applications.

The Council first adopted its SCI in 2007 and we have now updated it due to changes to the planning system and consultation regulations. Further details can be found at [www.blackpool.gov.uk/planningconsultations](http://www.blackpool.gov.uk/planningconsultations)

If you have any questions about the Core Strategy Proposed Submission or Statement of Community Involvement please do not hesitate to contact the Development Plans Team on 01253 476267.

Yours faithfully

Ms Jane Saleh

Head of Development Plans and Projects

Built Environment Directorate  
Housing, Planning and Transport  
Development Plans & Projects  
PO Box 17, Corporation Street  
Blackpool FY1 1LZ

Contact  
T: (01253) 477477  
E: [development.plans@blackpool.gov.uk](mailto:development.plans@blackpool.gov.uk)  
[www.blackpool.gov.uk](http://www.blackpool.gov.uk)



## Copy of Email sent to Consultees

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**From:** [consult@objective.co.uk](mailto:consult@objective.co.uk) [<mailto:consult@objective.co.uk>]  
**Sent:** 14 October 2014 08:50  
**To:** [REDACTED]  
**Subject:** BLACKPOOL LOCAL PLAN PART 1: CORE STRATEGY - PROPOSED SUBMISSION (JUNE 2014)

Representations are invited on the **Blackpool Core Strategy – Proposed Submission**, which the Council intends to submit to the Secretary of State for Examination.

The Core Strategy is a key planning document for Blackpool and sets out where new development including housing, employment, retail and leisure should be located to meet Blackpool's future needs to 2027. It identifies areas which will be regenerated, protected or enhanced and sets out key development principles such as design and affordable housing. The Core Strategy will be used to determine planning applications and priorities for the Borough over the next 15 years.

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[www.blackpool.gov.uk/corestrategy](http://www.blackpool.gov.uk/corestrategy)

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Email: [development.plans@blackpool.gov.uk](mailto:development.plans@blackpool.gov.uk)

Post: Planning Department

Blackpool Council

PO Box 17

Corporation Street

Blackpool

FY1 1LZ

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Further details can be found in the Statement of Representations Procedure on the Core Strategy webpage.

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If you have any questions about the Core Strategy Proposed Submission or Statement of Community Involvement please do not hesitate to contact the Development Plans Team on 01253 476267.

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**PUBLIC NOTICES**

**BLACKPOOL BOROUGH COUNCIL**

**Planning and Compulsory Purchase Act 2004  
The Town and Country Planning (Local Planning)  
(England) Regulations 2012  
Blackpool Local Plan  
Part 1: Core Strategy - Proposed Submission  
(June 2014)**

Representations are invited on the **Blackpool Core Strategy - Proposed Submission**, which the Council intends to submit to the Secretary of State for Examination.

The Core Strategy is a key planning document for Blackpool which sets out where new development including housing, employment, retail and leisure should be located to meet Blackpool's future needs to 2027. It identifies areas which will be regenerated, protected or enhanced and sets out key development principles such as design and affordable housing. The Core Strategy will be used to determine planning applications and priorities for the Borough over the next 15 years.

The Proposed Submission document, Sustainability Appraisal, Policies Map, Statement of Consultation and other accompanying documents including the Representation Form are available to view and download from the Council's website  
[www.blackpool.gov.uk/corestrategy](http://www.blackpool.gov.uk/corestrategy)

The Proposed Submission document, Sustainability Appraisal, Policies Map, Statement of Consultation and Representation Form are also available for inspection at the following locations during normal opening hours:

- Customer First Centre, Corporation Street, Blackpool
- All libraries across the Borough

Representations can be made online using the Council's consultation portal <http://consult.blackpool.gov.uk> or by completing the Representation Form and emailing to: [development.plans@blackpool.gov.uk](mailto:development.plans@blackpool.gov.uk) or posting to: Planning Department, Blackpool Council, PO Box 17, Corporation Street, FY1 1LZ

**The period for making any representations is  
Friday 4th July 2014 to 5pm Friday 29th August  
2014**

Dated this 4th day of July 2014.

Mark Towers, Director of Governance and Regulatory Services  
PO Box 1086, Town Hall, Blackpool FY1 1GB

**LICENSING ACT 2003 PUBLIC NOTICE**

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## New Blackpool local plan



Last Modified August 12, 2014

[Share this page](#)

The new Local Plan will guide planning matters in Blackpool. It will eventually replace the current Blackpool Local Plan 2001-2016 (which was adopted in June 2006).

The new Local Plan will be made up of:

- Local Plan Part 1 : Core Strategy
- Local Plan Part 2 : Site Allocations and Development Management document (this has not yet commenced preparation)

### Local plan part 1: Core strategy

The Core Strategy is a key planning document for Blackpool. It sets out where new development (including housing, employment, retail and leisure) should be located to meet Blackpool's future needs to 2027. It also identifies areas which will be regenerated, protected or enhanced and sets out the key development principles such as design and affordable housing. The Core Strategy will be used to determine planning applications and priorities for the town over the next 15 years.

There are a number of stages in developing the document which provide an opportunity for the community and other stakeholders to be involved in choosing the right planning policies for Blackpool.

### Proposed submission (June 2014)

**Consultation Friday 4 July to Friday 29 August at 5.00pm**

The Council is currently consulting on the **Proposed Submission**, in order for representations to be made prior to its submission to the Secretary of State for Examination.

It is the opportunity for those who are satisfied or dissatisfied with the Core Strategy to make formal representations. These will be considered alongside the Core Strategy when it is examined by the Planning Inspector.

The purpose of the examination is to consider whether the Core Strategy is **legally compliant, satisfies the Duty to Co-operate and meets the tests of soundness**. Any representations made at this stage must be in relation to these issues. Further information can be found in the [Guidance Notes on making Representations](#).

### Making representations

How to make a representation:

- Using the Council's online consultation portal using [this link](#)
- Downloading and completing the Representations Form using [this link](#)
- Obtaining a Representation Form from the following locations during normal opening hours
  - Customer First Centre, Municipal Buildings, Corporation Street
  - All libraries across the Borough.

The Proposed Submission document, Sustainability Appraisal, Policies Map, Statement of Consultation and Representation Form are also available to view at these locations.

### Supporting documentation

- Proposed Submission Core Strategy (June 2014)
- Proposed Submission Policies Maps (June 2014)
- Statement of Consultation (June 2014)
- Schedule of Representations: Revised Preferred Option
- Proposed Submission Core Strategy Sustainability Appraisal: Non Technical Report
- Proposed Submission Core Strategy Sustainability Appraisal: Full Report with Appendices
- Blackpool Council Response to the Proposed Submission Core Strategy Sustainability Appraisal (June 2014)
- Proposed Submission Habitats Regulation Assessment (May 2014)
- Infrastructure and Delivery Plan (June 2014)
- Local Development Scheme
- Equality Analysis

[Representation Form](#)

[Guidance Notes on Making Representations](#)

[Statement of Representations Procedure](#)

#### Evidence base

The Blackpool Core Strategy is informed by a comprehensive [evidence base](#) which consists of a number of detailed assessments on housing, employment and the environment, as well as other aspects of the current health and character of Blackpool and the wider Fylde Coast sub-region.

[Earlier Core Strategy Stages](#)

The Core Strategy has been informed by various stages of consultation during its preparation and a number of documents have previously been prepared.

Details of earlier work can be found on our [Earlier Core Strategy Stages page](#).

#### Next steps

A timetable for progressing the Core Strategy beyond this stage is as follows:

Core strategy timetable

Plan stage	Anticipated date
Submission to secretary of state	Late 2014
Examination in public	2015
Adoption	2015

#### Call for sites

As part of Blackpool's preparation of a New Local Plan, information is being sought on available sites in the Borough for potential housing development. If you have or know of a site that you think the Council should consider, please complete and return a [Housing Site Identification Form](#) with your map to us at [development.plans@blackpool.gov.uk](mailto:development.plans@blackpool.gov.uk)

Any site suggestions received will be assessed and the results published in the next update of the Blackpool Strategic Housing Land Availability Assessment.

### Statement of Representations Procedure

#### Title

Blackpool Local Plan Part 1: Core Strategy – Proposed Submission

#### Subject

This is a key planning document for Blackpool that sets out where new development including housing and employment, retail and leisure should be located to meet Blackpool's future needs to 2027. It identifies areas which will be regenerated, protected or enhanced and sets out key development principles such as design and affordable housing. The Core Strategy will be used to determine planning applications and priorities for the Borough over the next 15 years.

#### Period within which representations must be made

Representations can be made over an 8 week period, between Friday 4<sup>th</sup> July 2014 and 5pm on Friday 29<sup>th</sup> August 2014. We cannot accept any representations made after this time.

Representations can be made online via the Council's consultation portal (<http://consult.blackpool.gov.uk>) or using the Representation Form available on the Core Strategy webpage ([www.blackpool.gov.uk/corestrategy](http://www.blackpool.gov.uk/corestrategy)) and can be sent via:

- Email: [development.plans@blackpool.gov.uk](mailto:development.plans@blackpool.gov.uk)
- Post: Planning Department  
Blackpool Council  
PO Box 17  
Corporation Street  
Blackpool  
FY1 1LZ

#### Request to be notified

Representations may be accompanied by a request for you to be notified at a specified address that:

- the Core Strategy has been submitted for independent examination
- the recommendations of any person appointed to carry out an independent examination of the plan has been published
- the Core Strategy has been adopted

#### Availability of Documents

The Core Strategy Proposed Submission and its supporting documents are available online at: [www.blackpool.gov.uk/corestrategy](http://www.blackpool.gov.uk/corestrategy)

The Core Strategy Proposed Submission, Policies Maps, Sustainability Appraisal and Statement of Consultation are also available to view during normal opening hours at:

- Customer First Centre, Municipal Buildings, Corporation Street (Mon to Fri 9am-5pm)
- All libraries across the Borough

Further details on the libraries including opening times can be found at:

<http://www.blackpool.gov.uk/Residents/Libraries-arts-and-heritage/Libraries/Libraries-and-opening-times.aspx>

Other supporting documents are available to view from the Planning Department on request (or copies can be purchased). Please call the Development Plans Team on 01253 476267.

## Proposed Submission Core Strategy Representation Form

**Deadline for submitting representations:  
5pm on Friday 29<sup>th</sup> August 2014**

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**You should use this form for submitting representations as this will assist all parties involved in the Examination process, in particular the Inspector, to understand what case you are making and where applicable, how you wish the Core Strategy to be modified.**

Please submit your representation form in one of the following ways:

- by email to: [development.plans@blackpool.gov.uk](mailto:development.plans@blackpool.gov.uk)
- by post to: Planning Department, Blackpool Council, PO Box 17, Corporation Street, Blackpool FY1 1LZ

**Please read the separate Guidance Notes. It will help you complete this form. It is available at: [www.blackpool.gov.uk/corestrategy](http://www.blackpool.gov.uk/corestrategy)**

The Representation Form has four parts:

**Part A: Contact Information**

- You must provide a contact name and address.
- You do not need to complete Part A more than once but please ensure you state your name and organisation as applicable at the top of each Part B and C form you submit.
- Please tick whether you wish to be notified of subsequent stages of the Core Strategy.

**Part B: Core Strategy Representation**

- Complete a separate Part B of the Representation Form for **each** representation you wish to make on the Core Strategy.
- Please include your name and organisation and the relevant question number on any additional sheets you submit.
- Please refer to the **guidance notes** on making representations so that they address issues of legal compliance, compliance with the Duty to co-operate and meeting the tests of soundness which is the purpose of this consultation.
- You should cover succinctly all the information, evidence and supporting information necessary to justify your representation and the suggested modifications, as there will not normally be a subsequent opportunity to submit additional material. Further submissions will only be accepted at the request of the Inspector, based on the matters and issues he/she identifies for examination.

**Part C: Sustainability Appraisal Representation**

- Complete a separate Part C of the Representation Form for each representation you wish to make on the Sustainability Appraisal.

**Part D: Examination in Public**

- You **must** complete and sign Part D before you submit your representation.

**Please note that your name/organisation and representation/s will be made publicly available**

## PART A: Contact Information

For official use only

Ref: /

You must provide a contact name and address.  
Please complete Part A in BLOCK CAPITALS as appropriate.

	Person/Organisation	Agent (if applicable)
Title		
First Name		
Last Name		
Job Title		
Organisation		
Address		
Postcode		
Telephone		
Email		

### Notification of subsequent stages of the Core Strategy

Please specify if you wish to be notified of any of the following:

- Submission of the Core Strategy for independent examination    Yes  No
- Publication of the recommendations of the person appointed to  
carry out an independent examination of the Core Strategy    Yes  No
- Adoption of the Core Strategy    Yes  No

### How we will use your details

The personal information you provide on this form will be processed in accordance with the requirements of the Data Protection Act 1998. It will be used only for the preparation of local development documents as required by the Planning and Compulsory Purchase Act 2004. Your name, organisation and representations will be made publicly available when displaying and reporting the outcome of this statutory consultation stage, and cannot be treated as confidential. Other details, including your address and signature, will be treated as confidential.

Your details will remain on our database and will be used to inform you of future planning policy matters and procedures. If at any point in time you wish to be removed from the database, or to have your details changed, please contact the Development Plans team on 01253 476239 or [development.plans@blackpool.gov.uk](mailto:development.plans@blackpool.gov.uk)

2

**For official use only**

Ref: CSPS /

## PART B: Core Strategy Representation

**Please use a separate form for each representation**

**Name of Person / Organisation (if appropriate) making representation:**

<b>Name:</b>	
<b>Organisation</b>	

1. To which part of the Proposed Submission Core Strategy does this representation relate?	
Policy Reference	
Section/Paragraph Number	
Map Reference	
Appendix Number	

2. In respect of this part of the Plan, do you consider the Proposed Submission Core Strategy is:	
(a) Legally compliant?	Yes <input type="checkbox"/> No <input type="checkbox"/>
(b) Compliant with the Duty to Co-operate?	Yes <input type="checkbox"/> No <input type="checkbox"/>
(c) Sound?	Yes <input type="checkbox"/> No <input type="checkbox"/>

The considerations in relation to the Core Strategy being compliant or sound are explained in the Guidance Note available at [www.blackpool.gov.uk/corestrategy](http://www.blackpool.gov.uk/corestrategy).

If you have answered **No** to Question 2(a), you **must** answer Questions 3 and 4.

If you have answered **No** to Question 2(b), you **must** answer Question 5.

If you have answered **No** to Question 2(c), you **must** answer Questions 6, 7 and 8.

If you answered **Yes** to any part of Question 2, please go to Question 9.

3. In what way do you consider this part of the Core Strategy is not legally compliant? Please be as precise as possible.
Continue on a separate sheet/expand box if necessary

**4. What modification do you consider is necessary to make the Core Strategy legally compliant? You should explain why this modification would make the Core Strategy legally compliant.**

It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Continue on a separate sheet/expand box if necessary

**Please ensure you sign the declaration at the end of the Form**

**5. In what way do you consider this part of the Core Strategy is not compliant with the Duty to Co-operate? Please be as precise as possible.**

It should be noted that any non-compliance with the Duty to Co-operate is incapable of being resolved through modification at the Examination.

Continue on a separate sheet/expand box if necessary

**Please ensure you sign the declaration at the end of the Form**

**6. In what respect do you consider this part of the Core Strategy is unsound?**

- |  |                          |
|--|--------------------------|
| (i) Not positively prepared              | <input type="checkbox"/> |
| (ii) Not justified                       | <input type="checkbox"/> |
| (iii) Not effective                      | <input type="checkbox"/> |
| (iv) Not consistent with national policy | <input type="checkbox"/> |

**7. In what way do you consider this part of the Core Strategy is unsound? Please be as precise as possible.**

If you wish to comment on more than one of the four matters of soundness in relation to a specific aspect of the Plan, for example a specific policy, please complete a separate Part B sheet for each one.

Continue on a separate sheet/expand box if necessary

**8. What modification do you consider is necessary to make the Core Strategy sound, having regard to the test you have identified at Question 6?**

You should explain why this modification would make the Core Strategy sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Continue on a separate sheet/expand box if necessary

**Please ensure you sign the declaration at the end of the Form**

**9. In what way do you support the legal compliance or soundness of the Core Strategy?**

Continue on a separate sheet/expand box if necessary





## APPENDIX B: SUMMARY OF REPRESENTATIONS (PRESENTED IN THE SAME ORDER AS THE PROPOSED SUBMISSION CORE STRATEGY (JUNE 2014)) TOGETHER WITH THE COUNCIL'S RESPONSE

### Contents

**Chapter 1 Introduction**

**Chapter 2 A Spatial Portrait of Blackpool**

**Chapter 3 Spatial Vision and Objectives**

Vision

Objectives

Policy NPPF 1: Presumption in Favour of Sustainable Development

**Chapter 4 Spatial Strategy**

Key Diagram

Policy CS1: Strategic Location of Development

**Chapter 5 Core Policies**

Policy CS2: Housing Provision

Policy CS3: Economic Development and Employment

Policy CS4: Retail and Other Town Centre Uses

Policy CS5: Connectivity

Policy CS6: Green Infrastructure

Policy CS7: Quality of Design

Policy CS8: Heritage

Policy CS9: Water Management

Policy CS10: Sustainable Design and Renewable and Low Carbon Energy

Policy CS11: Planning Obligations

**Chapter 6 Strengthening Community Wellbeing**

Policy CS12: Sustainable Neighbourhoods

Policy CS13: Housing Mix, Standards and Density

Policy CS14: Affordable Housing

Policy CS15: Health and Education

Policy CS16: Traveller Sites

**Chapter 7 Regenerating Blackpool Town Centre and Resort Core**

Policy CS17: Blackpool Town Centre

Policy CS18: Winter Gardens

Policy CS19: Central Business District (Talbot Gateway)

Policy CS20: Leisure Quarter (Former Central Station Site)

Policy CS21: Leisure and Business Tourism

Policy CS22: Key Resort Gateways

Policy CS23: Managing Holiday Bed Spaces

**Chapter 8 Enabling South Blackpool Growth and Enhancement**

Policy CS24: South Blackpool Employment Growth

Policy CS25: South Blackpool Housing Growth

Policy CS26: Marton Moss

Policy CS27: South Blackpool Transport and Connectivity

**General Plan Comments**

**Other Comments**

**Supporting Documents**

Sustainability Appraisal

Habitats Regulations Assessment

Draft Statement of Compliance with the Duty to Co-operate

Infrastructure and Delivery Plan

Chapter 1: Introduction

No representations received

Chapter 2: A Spatial Portrait of Blackpool

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Fylde Council		Not specified	Not specified	Not specified	Para 2.37 (bullet 7) - Notes that although there is no planned strategic review of the Green Belt, this bullet states ' <i>Any change will be managed in a positive way</i> '. The Green Belt between Blackpool and St Annes is of strategic importance to both Blackpool and Fylde Councils. The NPPF states any change to Green Belt boundaries should only be made in exceptional circumstances through preparation or review of the local plan.	Clarification sought.	Comment noted. Reference to 'change' in Para 2.37 is in relation to development as opposed to the Green Belt boundary. Minor Modification <b>MM004</b> for clarity.
English Heritage		Not specified	Not specified	No	There has been no proper, accurate assessment of the historic environment in Blackpool and the contribution it makes to its unique identity and special character (NPPF Paragraph 169). This section needs to be expanded to provide detail on the built heritage in the town to illustrate this.	The Plan needs to be amended to ensure that there is an accurate and descriptive portrait of the built environment in Blackpool and the contribution it makes to the area.	The Spatial Portrait provides an overview of Blackpool including reference to its historic environment. No change.
English Heritage		Not specified	Not specified	No	Para 2.23 - The Plan should put forward a more positive description of the built environment in Blackpool.	The Plan should be amended to describe the unique built environment and reference made to its important iconic heritage assets.	Blackpool's built environment is set out in a number of evidence base documents. No change.
English Heritage		Not specified	Not specified	No	Para 2.23 - List of heritage assets is incorrect.	Listed Buildings: 41	After seeking clarification from the Built Heritage Team there are 40 confirmed Listed Buildings. Minor modification <b>MM001</b> .
English Heritage		Not specified	Not specified	No	Para 2.37 (bullet 6) - As mentioned above, the Plan needs to provide a detailed spatial portrait of the historic environment in Blackpool including its unique identity and character. This will help inform a specific historic environment issue that will deal with the identified features of the town. This bullet point does not really identify a priority issue that is backed up by clear research and evidence to inform the Plan.	The Plan should be expanded to detail the historic environment in the town and the importance of it to tourism, economic wellbeing etc. and this can therefore inform a more specific priority issue for the historic environment.	Blackpool's built environment is set out in a number of evidence base documents. The Spatial Portrait provides an overview of Blackpool including reference to its historic environment.
Bourne Leisure	NLP	Yes	Yes	No (not consistent with National Policy)	Notes that paragraphs 2.5 and 2.12 recognise there has been a significant decline in the visitor numbers in Blackpool since the 1980s, resulting in an underperforming economy. Linked to this, support should be given throughout the Core Strategy to the enhancement of existing tourism accommodation and facilities in order to comply with the NPPF objectives for economic growth and sustainable	Policies and supporting text throughout the Core Strategy should support the enhancement of existing tourism accommodation and facilities, including holiday parks, as well as the development of new, high quality tourism accommodation and facilities.	Core Strategy policies and objectives are to be read as a whole. Policy CS21 specifically supports existing tourism operators. No change.

### Chapter 2: A Spatial Portrait of Blackpool

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
					development.		
NS&I/Rowland Homes	JLL	Not specified	Not specified	No	<p>Agrees that Blackpool's economy is under performing relative to the national level. The Spatial Portrait should recognise that Blackpool's office market is has been undergoing a period of stagnation. The existing city centre office market comprises mainly of refurbished Grade B/Grade C accommodation.</p> <p>Blackpool has an unbalanced housing market characterised by an oversupply of poor quality one-person accommodation limited choice of family housing which is having a negative effect on the provision of a stable and cohesive community. The recognition that Blackpool has an extreme set of housing challenges is welcomed.</p>	<p>Acknowledgement that the effects of the demographic situation in Blackpool has led to high levels of deprivation, poor health, an aging population and decline in resident workforce.</p> <p>Recognition that housing market should be rebalanced to address the projected out migration and acknowledgement that there is a lack of larger 'aspirational' family dwellings.</p>	Appropriate reference is already made in the Spatial Portrait to Blackpool's economic and demographic issues and need to rebalance the housing market. No change.
NS&I/Rowland Homes	JLL	Not specified	Not specified	No	Figure 7 - question the identification of the NS&I site as 'open land meeting community and recreational needs'		Figure 7 is illustrative and identifies Blackpool's green spaces. Part of the key is missing; the correct label should be 'other areas of greenspace'. Minor modification <b>MM002</b> .

### Chapter 3: Spatial Vision and Objectives

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
English Heritage		Not specified	Not specified	No	The NPPF states that a Local Plan should include a strategy for the conservation and enhancement of the historic environment. The Vision does little to put forward a vision for the long term conservation and enhancement of the historic environment.	Amendments are required to ensure the historic environment is conserved and enhanced including specific assets which should have been identified earlier on in the Plan.	The importance of a quality built, historic and natural environment to Blackpool's future is inherent in the Vision. No change.
Bourne Leisure	NLP	Yes	Yes	No (not consistent with National Policy)	Support the Vision. However, greater support and recognition should be given to Blackpool as the main tourism centre for the Fylde Coast. Reference should also be made to the very significant contribution that visitor accommodation and other facilities make to the Borough's tourism profile and the local economy.	Amend Vision to state: ' <i>In 2027 Blackpool has built upon its status as Britain's favourite seaside resort, <b>and the main tourism centre for the Fylde Coast</b>, to become renowned for the quality and innovation of its culture, entertainment and business tourism offer.....The resort, <b>and the leisure and tourism attractions and facilities that support it</b>, offer a high quality visitor experience</i>	The changes sought were also suggested by the respondent in an earlier consultation response (Revised Preferred Option); and the Council's response is set out in the Consultation Statement (June 2014). No change.

Chapter 3: Spatial Vision and Objectives

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
						<i>attracting new audiences and creating new reasons to visit Blackpool year-round.'</i>	
NS&I/Rowland Homes	JLL	Not specified	Not specified	Yes	Generally supportive.	Vision should recognise the need for larger family homes to redress the housing in-balance.  Goal 4 should refer to the need for quality housing as well as design quality and sustainable principles.	Rebalancing the housing market with new, quality homes is already inherent in the Vision. Quality housing, design and other sustainability issues are included in objectives 1-13; no need to repeat. No change.
English Heritage		Not specified	Not specified	No	Goal 1, Bullet 5 - Welcome this objective although no detail provided in the plan to identify Blackpool's 'rich' heritage to inform this objective.	Amendments needed to detail the historic environment and Blackpool's unique identity and character.	The importance of a quality built, historic and natural environment to Blackpool's future is inherent in the Vision and Objectives. No change.
English Heritage		Not specified	Not specified	No	Goal 3, Bullet 14 - Support the reference to heritage, but considers the Plan does little to support this objective.	Plan needs to detail the historic environment and heritage assets in the area and make an assessment of their contribution.	The importance of a quality built, historic and natural environment to Blackpool's future is inherent in the Vision and Objectives.
Bourne Leisure	NLP	Yes	Yes	No (not consistent with National Policy)	Support Goal 3 Objective 14, however it is important for planning policy to support the enhancement of existing tourism accommodation and facilities (e.g. holiday parks), as well as promoting new facilities, both within and outside the resort core, to help sustain a high quality visitor offer.	Objective 14 should be amended to state: <i>'Sustain a high quality, year-round visitor offer by growing and promoting our tourism, arts, heritage and cultural offer including <b>supporting existing tourism accommodation and facilities both within and outside the resort core, and providing</b> new high quality attractions, accommodation and conferencing facilities and an exciting programme of national events and festivals'</i>	The changes sought were also suggested by the respondent in an earlier consultation response (Revised Preferred Option); and the Council's response is set out in the Consultation Statement (June 2014). No change.
Blackpool Pleasure Beach	RPS	Yes	Yes	No (not positively prepared, not effective)	Concerned that objective 15 is likely to steer all retail, leisure and other town centre uses into the Town Centre; however in Blackpool town centre uses should also be appropriate along the seafront in the Resort Core otherwise investment in new tourist attractions and other tourism-related development may be suppressed outside the Town Centre boundary.  Goal 3 will potentially reduce the extent to which new tourism, leisure and tourism retail developments can come forward in the park as this type of development may be directed to the Town Centre, thereby not allowing the reasonable requirements of the Pleasure Beach to be met. There are also areas of the seafront immediately south of Chapel Street that would benefit from new investment in tourism and leisure uses, which again would potentially be undermined by this objective.	Goal 3 (Objective 15) should be amended so that it is in line with other policies in the Plan and does not undermine investment at the major seafront attractions in the Resort Core.  Suggests rewording:  "15. Secure investment in retail, leisure and other town centre uses in Blackpool Town Centre <b>and the Resort Core seafront</b> to strengthen the offer with high quality shopping, restaurants, leisure, entertainment and offices, making the Town Centre the first choice shopping destination for Fylde Coast residents and an attractive place to visit and do business."	Another of the key objectives (14) is to sustain a high quality visitor offer by growing and promoting our tourism offer including new attractions and accommodation.  Policy CS21 'Leisure and Business Tourism' recognises the importance of Blackpool's tourist economy and supports proposals for new tourism development focused in both the Town Centre and Resort Core.  No change.

**Chapter 3: Spatial Vision and Objectives**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
					<p>Objective 15 also directly contradicts other statements and policies in the Plan, e.g. the Vision and Policy CS21.</p> <p>Acknowledge that objective 15 may not be for these uses to be exclusively located in the Town Centre with the intention for this to work alongside other policies in a flexible manner. Unclear as currently drafted.</p>		

**Chapter 3: Spatial Vision and Objectives  
Policy NPPF 1: Presumption in Favour of Sustainable Development**

No representations received

**Chapter 4: Spatial Strategy  
Key Diagram**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Bourne Leisure	NLP	Yes	Yes	Yes	Pleased to note that the Key Diagram has been amended to exclude Marton Mere Holiday Village from the South Blackpool Growth and Enhancement Area.	-	Support noted.
NS&I/Rowland Homes	JLL	No	Not specified	Not specified	Object to the specific identification of the NS&I site as a location for "Employment Growth".	There should be recognition that the site is suitable to accommodate alternative higher value uses such as residential on part of the site where these are required to facilitate the development of new employment development on the site.	The changes sought were also suggested by the respondent in an earlier consultation response (Revised Preferred Option); and the Council's response is set out in the Consultation Statement (June 2014). No change.

**Chapter 4: Spatial Strategy  
Policy CS1: Strategic Location of Development**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Bourne Leisure	NLP	Yes	Yes	No (not positively prepared, not consistent with national policy)	<p>Object to this policy. The Core Strategy spatial policies should also recognise the importance of the tourism offer outside the Resort Core in terms of the significant contribution these other areas make to the Borough's tourism profile and the local economy.</p> <p>Also object to the wording of paragraph 4.7 which states '<i>the Resort Core must be a focus for future tourism and leisure development and investment</i>' in order to '<i>support a sustainable visitor economy</i>'. The enhancement and expansion of tourism accommodation and facilities elsewhere should be encouraged.</p>	<p>An additional paragraph (4) should be included:</p> <p><b><u>4. Supporting the promotion of new and enhancement of existing tourism facilities and accommodation, including holiday parks, outside of the Resort Core, particularly where this supports the objective of a year round tourism offer.</u></b></p>	<p>The changes sought were also suggested by the respondent in an earlier consultation response (Revised Preferred Option); and the Council's response is set out in the Consultation Statement (June 2014). No change.</p>
NS&I/Rowland Homes	JLL	Not specified	Not specified	No	<p>Whilst the Spatial Strategy is supported, there needs to be recognition that a wide choice of suitable sites for market housing and employment should be provided outside the Strategic Location of Development in order to re-balance the housing market and to assist in addressing the economic decline of the Borough.</p> <p>There is an acknowledged lack of quality larger family housing in the Borough, which is needed to redress the projected out- migration of population.</p>	<p>Policy CS1 or the reasoned justification should recognise the need to provide larger "aspirational" family dwellings outside the Strategic Location of Development.</p> <p>There should be specific reference to regeneration being permitted outside the Strategic Location of Development, where this is of a scale and nature which meets the needs and opportunities of the Area.</p>	<p>Support for spatial strategy noted. This policy identifies the overarching spatial focus for Blackpool. Development in other areas is addressed in other Core Strategy policies such as CS2 'Housing Provision'.</p>

**Chapter 5: Core Policies  
Policy CS2: Housing Provision**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Wyre Council		Not specified	Not specified	Not specified	<p>The policy states that "around" 4,200 dwellings will be provided. The supporting text specifically identifies the phasing arrangements. Need to ensure policy wording and supporting text are fully aligned.</p>	<p>Delete the word "around" from Policy CS2 and make clear that the housing requirement is a minimum.</p>	<p>The phasing arrangements are described as targets to provide flexibility over the plan period to meet the 4,200 new homes required. Not considered to contradict. Will delete 'around' for clarity. Minor modification <b>MM005</b>.</p>
Home Builders Federation				No (not positively prepared, justified or effective)	<p>Current policy wording is not considered to be positively prepared or aspirational.</p>	<p>'...delivery of around...' should be replaced by '<i>...delivery of at least...</i>'</p>	<p>4,200 dwellings over the plan period sits within the OAN range - not a minimum target so the policy does not need to state 'at least'. Will delete 'around' for clarity. Minor modification <b>MM005</b>.</p>

**Chapter 5: Core Policies  
Policy CS2: Housing Provision**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
					<p>Concern regarding the objectively assessed need (OAN). 280dpa is a significant reduction from the Regional Strategy requirement and not sufficient to meet Government's stated aspirations to boost housing supply. 280dpa sits at the bottom end of the OAN range and so the aspirations of the Council and whether the plan is considered positively prepared require consideration.</p> <p>Failure to deliver windfall targets will detrimentally impact upon delivery of the plan and the demonstration of a five year supply.</p> <p>Para 5.13: welcomes the statement that the SHLAA will identify a reasonable buffer of sites... however unclear how this would work in practice and whether the additional sites are themselves constrained.</p> <p>Paras 5.19 to 5.22: do not support a phased approach and contrary to the NPPF. The Council should promote more viable sites earlier in the plan period. A brake on growth will result in continued affordability issues and may also slow economic recovery. The 30% buffer of SHLAA sites will account for any under-delivery; therefore the Council already has a mechanism to deal with slower delivery. The stepped figure enables the Council to reduce its 5 year requirement (otherwise it cannot demonstrate a 5 year supply) which is not justification. Also disagree with the 5 year supply calculation which takes no account of demolitions and spreads the under-supply across the full plan period (contrary to the NPPG).</p>	<p>The Council should reconsider its housing requirement and consider a target which would not only promote jobs growth but also better meet the substantial affordable housing need across Blackpool.</p> <p>Recommended a cautious approach is adapted towards windfall and that the delivery of windfall sites is closely monitored.</p> <p>Greater clarity is required.</p> <p>Deletion of the phased housing requirement. Any under-supply be dealt with in the first five years of the plan.</p>	<p>Robust justification for choosing the housing requirement figure which supports realistic levels of economic growth is evidenced in the <i>Housing Technical Paper (2014)</i>. No change.</p> <p>The windfall target is justified in the <i>Housing Technical Paper (2014)</i>. Delivery of windfall sites will continue to be monitored.</p> <p>The methodology statement set out in the <i>2013 SHLAA Update</i> includes more information on a buffer of sites. It includes sites assessed as deliverable and developable over the plan period.</p> <p>Robust justification for a phased approach to housing delivery which reflects realistic market conditions is evidenced in the <i>2014 Housing Technical Paper</i>.</p> <p>The 5 year supply calculation in the 2013 SHLAA Update does include demolitions; while the shortfall calculation used is most appropriate for the Blackpool market.</p>
NS&I/Rowland Homes	JLL	Not specified	Not specified	No (not effective)	<p>Regard should be given to the 2012 based Sub National Population Projections (SNPP).</p> <p>The Local Plan should recognise that past trends, upon which the projections are based, relate to a period of recession and persistent under delivery of housing in terms of numbers and rates of migration. There should be full recognition in Policy CS2 that this needs to change in order to reverse the economic decline which Blackpool has been experiencing.</p>	<p>Policy CS2 should specifically identify the need to rebalance the housing market in Blackpool in order to address the projected out migration by meeting the needs of local people and providing quality homes to attract new households. This should include widening the choice of market housing across the Borough.</p> <p>Acknowledge there will be a review of Policy CS2 if there is significant under-delivery of housing against the Plan target.</p>	<p>The SHMA addendum (November 2014) considers the 2012 based Sub National Population Projections.</p> <p>The implication of past trends on future projections is reflected in the 2013 Fylde Coast SHMA and future addendums as well as the Housing Technical Paper.</p> <p>Para 5.3 cross references other policies in the Core Strategy which address housing quality and mix.</p>

Chapter 5: Core Policies Policy CS2: Housing Provision							
Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
							Para 1.2 commits to a review of the Plan. No need to repeat here.
The Co-operative Group		Not specified	Not specified	Yes (justified and consistent with national policy)	Support the allowance for windfall sites within the policy and the justification provided in Para 5.17, given that it will facilitate development of sites such as the Co-op Sports Club for more suitable and viable uses to meet the needs of the Borough.	-	Support noted.
Lancaster City Council		Not specified	Yes	Not specified	Para 5.7 - Raises a concern that by opting to no longer cater for the needs of the housing benefit claimants that have been priced out of their own areas, this need will not simply go away and will need to be addressed elsewhere.	-	The <i>Housing Technical Paper</i> provides robust justification for choosing the housing requirement figure, which is based on a realistic jobs-led scenario from the SHMA and uses a standard methodology linking in-migration to support job growth. Blackpool's unique in-migration trend is an aside issue also detailed in the Housing Technical Paper, which the supporting text tries to simplify. On reflection this has caused some unintended confusion and will be deleted. Minor modification <b>MM006</b> .
Homes and Communities Agency		Not Specified	Not Specified	Not Specified	Supports the main sources for housing delivery.	-	Support noted.

Chapter 5: Core Policies Policy CS3: Economic Development and Employment							
Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
NS&I/Rowland Homes	JLL	Not specified	Not specified	No (not effective)	<p>Object to the designation of the NS&amp;I site as a location for Economic Growth and Employment. The identified locations for business and industrial are considered out of date and fail to have regard to market demand.</p> <p>The evidence base fails to take account of business churn. Not all of the 13 main industrial/business locations are in demand or viable including the NS&amp;I site.</p> <p>NS&amp;I site should not be identified as an Employment Site in Figures 11 and 18.</p>	<p>Amend policy to recognise that employment and mixed use schemes will contribute to the local economy and provide high quality residential accommodation in an established community, which will assist in meeting the Borough's needs for new housing, prioritising previously developed land. A mixed use designation would be the most sustainable use for the site to ensure the viability and deliverability of the employment lead mixed use.</p> <p>Policy CS3 should specifically state "<i>Where land</i></p>	<p>These comments/changes sought were also suggested by the respondent in an earlier consultation response (Revised Preferred Option); and the Council's response is set out in the Consultation Statement (June 2014). No change.</p> <p>The Council has continued to work with the respondent to consider viable development opportunities to secure the long term future of the site, in line with Policy. The 2013 Employment Land Study reflects this position.</p>

**Chapter 5: Core Policies**  
**Policy CS3: Economic Development and Employment**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
					Policy should recognise the need to make full and effective use of poorly performing employment sites for mixed use development, which includes residential. Such an approach would enable higher quality employment premises to be provided, which will enable the maximum benefit to be achieved, in terms of social, economic and environmental gain.	<u><i>which is currently in use or allocated for employment, development will be safeguarded from changes to other types of development except where there is no current or likely future demand for employment uses on the land or where other uses would bring wider regeneration, environmental and amenity benefits</i></u> .  It should also recognise that mixed use housing and employment schemes can make a significant contribution to the local economy of Blackpool, and assist in reversing the economic decline over the last 10 years.	
Lancaster City Council		Not specified	Yes	Not specified	Paras 7.10-7.11 – no objection to the positive policy position (regarding the supporting of/ growing existing and new businesses with an agreement with Fylde BC to accommodate Blackpool’s employment land shortfall) on duty to co-operate grounds, but there may be a conflict in objectives if seeking to establish a joined-up strategic approach to the housing and employment needs of the Blackpool area.	-	Planning for realistic levels of employment growth to support the economic and housing objectives is set out in the 2013 Employment Land Study. No change.
Homes and Communities Agency		Not Specified	Not Specified	Not Specified	Supports the Town Centre focus and also emphasis on South Blackpool.	-	Support noted.

**Chapter 5: Core Policies**  
**Policy CS4: Retail and Other Town Centre Uses**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Fylde Council		Not specified	Not specified	Not specified	5.52 - The comparison floor space figure is taken from the 2011 Fylde Coast Retail Study. A different figure is provided for Blackpool in the 2013 retail update.	Clarification sought.	The 2013 Retail Update was undertaken to provide further clarification on retail matters relating to Fylde and Wyre only. No change.
Wyre Council		Not specified	Not specified	Not specified	The comparison floor space figure is taken from the 2011 Fylde Coast Retail Study. A different figure is provided for Blackpool in the 2013 retail update.	Capacity figures should be amended using the figures in the 2013 update.	The 2013 Retail Update was undertaken to provide further clarification on retail matters relating to Fylde and Wyre only. No change.
English Heritage		Not specified	Not specified	No	5.52 - Any proposals put forward for the Winter Gardens should be in line with the Conservation Management Plan. Does not support a scheme to convert the building into retail use.	Delete reference the redevelopment of the Winter Gardens for retail.	The Conservation Management Plan will be referenced in the Winter Gardens policy. Minor Modification <b>MM028</b> .

**Chapter 5: Core Policies**  
**Policy CS4: Retail and Other Town Centre Uses**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
							Complimentary retail uses are supported as part of the wider refurbishment of the Winter Gardens (See Policy CS18 Winter Gardens). Paragraph 5.52 will be amended for clarity. Minor Modification <b>MM008</b> .
Blackpool Pleasure Beach	RPS	Yes	Yes	No (not effective, not positively prepared)	<p>Concerned that policy reads as if it is solely relating to retail development. The effect of the Policy will be to steer all town centre uses into the Town Centre, which includes tourism and leisure development.</p> <p>Part 1 - states major new retail development will be focussed on the town centre to strengthen the offer and improve the quality of the shopping experience. This part of the policy is appropriate as Blackpool's town centre needs to be supported in order to reduce leakage to other towns. However, Blackpool Pleasure Beach has made it clear to the Council in previous representations that it needs to improve its retail offer in order to compete with other similar attractions elsewhere. This will remain as tourism retailing and would not include mainstream town centre retailers. It is considered that the retail offer at the park needs to be improved to enable it to meet the aspirations of visitors and this requirement needs to be reflected in the Plan in some way. For the Plan to be positively prepared, it should recognise this need and build sufficient flexibility into the policy, whilst ensuring that the position of the Town Centre is not undermined.</p> <p>Part 2 - appropriate and sound.</p> <p>Part 3 - could have significant (possibly unintended) consequences for tourism and leisure investment along Blackpool's seafront. The criteria in the policy mean that there has to be no more centrally located/sequentially preferable sites, no impact on existing centres, no undermining of the Council's strategies and proposals for regenerating centres and must be readily accessible by public transport and other sustainable transport modes.</p> <p>It is essential that it is clarified that, for the purposes of the Local Plan, town centre uses are also appropriate along the seafront in the Resort Core.</p>	<p>Policy CS4 should be amended so that it does not undermine investment at the major seafront attractions in the Resort Core.</p> <p>Suggests rewording:  <i>"3. In edge of centre and out of centre locations, proposals for new retail development <del>and other town centre uses</del> will only be permitted where it can be demonstrated that:</i>  <i>a. There are no more centrally located/sequentially preferable, appropriate sites available for the development</i>  <i>b. The proposal would not cause significant adverse impact on existing centres</i>  <i>c. The proposal would not undermine the Council's strategies and proposals for regenerating its centres</i>  <i>d. The proposal will be readily accessible by public transport and other sustainable transport modes.</i>  <b><u>In the Resort Core, proposals for leisure, entertainment and tourism development (including tourism-related retailing) will be permitted."</u></b></p> <p>An appropriate sentence will need to be added into the supporting text to explain that proposals for these specific town centre uses will be acceptable in the Resort Core.</p>	The changes sought were also suggested by the respondent in an earlier consultation response (Revised Preferred Option); and the Council's response is set out in the Consultation Statement (June 2014). Core Strategy policies are to be read as a whole. Policy CS21 specifically supports new high quality tourism attractions in Resort Core. No change.

**Chapter 5: Core Policies  
Policy CS4: Retail and Other Town Centre Uses**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
					<p>This policy effectively downgrades the role of the Resort Core seafront areas from being the focus of tourism and leisure investment to being an inappropriate location for this type of development unless a series of criteria are met.</p> <p>There are areas of the seafront immediately south of Chapel Street that would benefit from new investment in tourism/leisure which will be undermined by this policy.</p> <p>The policy contradicts other policies in the Plan that support leisure, entertainment and tourism development in Blackpool's Resort Core.</p>		

**Chapter 5: Core Policies  
Policy CS5: Connectivity**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Bourne Leisure	NLP	Yes	Yes	No (not consistent with national policy)	Support para 5.60, however consider that emerging objectives and policies for transport and accessibility in the Borough should recognise that in relation to tourism, there is often no feasible alternative option available other than the private car for reaching tourist-related developments.	Additional text should be added point 8 (either within the Policy or as supporting text) to recognise that in the case of tourism developments (accommodation and facilities) in less accessible areas, there may be no alternative to the private car.	The policy focus is for new development to promote more sustainable travel where practicable. No change.
Blackpool Pleasure Beach	RPS	Yes	Yes	Yes	<p>The policy has been substantially improved in line with our previous representations. The purpose of the previous representations was to recognise that links between the main car parks in the Central Corridor and the Pleasure Beach are currently poor and that the Plan needs to provide an appropriate framework for its improvement. The amendments to the policy now recognise that these need to be improved (paragraph 5.77, 5.79, 5.80 and 5.85 also cover this point).</p> <p>We consider the correct procedures have been followed and it has had regard to the National Planning Policy Framework</p>	-	Support noted.

**Chapter 5: Core Policies  
Policy CS6: Green Infrastructure**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Wyre Council		Not specified	Not specified	Not specified	Welcomes the confirmation that there is no planned strategic review of the Green Belt boundaries during the plan period.	-	Support noted.
Wildlife Trust		Yes	Yes	Yes	Para 5.112 is compliant with the requirements of the Government's Natural Environment White Paper and with the NPPF.	-	Support noted.
Woodland Trust		Yes	Yes	No (Not consistent with national policy)	Policy does not give strong protection to ancient woodland and ancient/veteran trees.	Add to 1a – <b><i>'In particular development which would have an adverse impact on irreplaceable habitats such as ancient woodland and ancient/veteran tree will not be permitted.'</i></b>	There is no requirement to repeat national policy. No change.
Woodland Trust		Yes	Yes	No (Not justified)	With respect to paras 5.103 and 5.104, it does not recognise evidence which suggests a need for the creation of new woodland as part of green infrastructure. The Access to Woodland Standard aspires that everyone should have access to a small wood of at least 2 hectares within 500m of their home.	Recognise the shortage of woodland and set targets for woodland creation to redress shortfall.	Reference to woodland now included in para 5.104 - Minor modification <b>MM011</b> . This matter will be further explored in the Green Infrastructure Strategy referenced in paragraph 5.112.
Natural England		Not specified	Not specified	Not specified	While Policy CS6 is generally welcome it is currently too broadly worded to provide sufficiently detailed guidance about the particular measures that will be needed to address the effects of increased recreation on the SPA, for example, a local policy should provide guidance on the design or other requirements that will sought from new development in this area. (Linked to separate comment on the Habitat Regulations Assessment.)	A site specific policy (for Whyndyke and other relevant allocations in this part of Blackpool) could usefully link to and add detail to Policy CS6 Green Infrastructure (point 3).	No further detail considered necessary for this strategic plan. Site specific policies will be addressed in the Site Allocations and Development Management DPD. No Change.
English Heritage		Not specified	Not specified	No	Green infrastructure is an important component of the historic environment and opportunities to enhance it should be promoted. There is nothing in this policy which is place specific and details how this should be applied locally.  There is no mention of the two conservation areas and Stanley Park within the policy itself.	The Plan should be amended to include reference to the historic environment in the Green Infrastructure policy and recognise the importance of it for the historic environment in the area. The policy should also refer to place specific elements to reinforce the locally specific elements of the Plan. In particular reference should be made to the Grade II* Registered Park and Garden and the two conservation areas Town Centre and Stanley Park.	Core Strategy policies to be read as a whole. Appropriate reference made in the supporting text. No change.
English Heritage		Not specified	Not specified	No	5.96 - Stanley Park is a Grade 2* Listed Park.	Insert *	Comment noted. Minor Modification <b>MM010</b> .
Bourne Leisure	NLP	Yes	Yes	No (not consistent with national	Supports the general principle of the policy. In order for the plan to be sound, the supporting text to Policy CS6 should reflect the need to balance the economic and social objectives for the area.	Supporting text should recognise that there is scope for appropriate development in areas adjacent to designated sites provided that mitigation measures are implemented in order	The need to balance economic and social objectives is covered by policy NPPF1 which cross cuts all the objectives/policies in the Plan.

**Chapter 5: Core Policies  
Policy CS6: Green Infrastructure**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
				policy)	Part 3 - Consideration needs to be given to the significance of the site/adjoining area in terms of landscape and ecological value, to reflect paragraph 113 of the NPPF.	to minimise both direct and indirect impacts.  It should be fully recognised in the policy and supporting text that careful detailed design and layout of any development adjacent to the buffer zone will ensure a satisfactory interface in visual terms and natural surveillance. There may also be opportunities to introduce areas of open space and cycle paths as part of new development and this should be encouraged.	This issue is covered by Part 3 of policy CS6. No change.  Issues relating to the design and proposed open space are dealt with in 5.106, 5.107 and other Core Strategy policies.
The Co-operative Group		Not specified	Not specified	No (not positively prepared, not justified)	<p>The policy ensures the continued wholesale retention of open space, sports and recreational buildings and land without any assessment of its suitability or quality, thereby undermining the potential for sites which are no longer functioning to be re-used to meet the council's other development and infrastructure requirements, especially in relation to housing.</p> <p>The inclusion of the word 'existing' in the policy ensures the continued wholesale retention of open space, sports and recreational buildings and land without any assessment of its current quality, thereby undermining the potential for sites which are no longer functioning to be re-used to meet the council's other development and infrastructure requirements, especially in relation to housing.</p> <p>The Council has been limited in its approach in the SHLAA by not fully considering the potential to re-allocate sites currently allocated for other purposes where this purpose is null and void such as open space, sports and recreational buildings and land.</p> <p>The Council has not adopted a robust approach in assessing and prioritising sites for residential development. In adapting the narrow approach in its' SHLAA by having the word 'existing' in Policy CS6, Blackpool is not meeting this requirement to identify all potential sites and as a result the Core Strategy is not positive in its approach to meeting the housing shortage in its borough.</p> <p>Use of the word 'existing' in Policy CS6 assumes all existing open space, sports and recreational</p>	Removal of 'existing' in 1a (2 <sup>nd</sup> para) would make the policy sound and allow the review of sites and release of those that no longer serve any practical benefit as allocated open space.	<p>This policy aligns with NPPF paragraph 74.</p> <p>The policy is supported by an up to date Open Space Audit. The approach to future allocations is set out in para 5.93 of the Core Strategy.</p> <p>The Council considers a robust methodology has been used in preparing the SHLAA.</p> <p>No change.</p>

Chapter 5: Core Policies Policy CS6: Green Infrastructure							
Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
					<p>buildings and land is suitable and worthy of retention, however this assumption is entirely unjustified as the evidence base is not robust.</p> <p>The evidence base ( 2009 <i>Blackpool Open Space, Sport, Recreation Audit and Position Statement</i>) is not a robust or credible as it is:</p> <p>a) Out of date b) Provides very little qualitative assessment</p> <p>The Statement is also mainly quantitative, is broad brushed and does not provide a grading of quality.</p>		

Chapter 5: Core Policies Policy CS7: Quality of Design							
Wildlife Trust		Yes	Yes	No (not effective)	No reference is made to the natural environment, biodiversity or ecological networks.	Add reference to the natural environment, biodiversity and ecological networks.	The Core Strategy policies are to be read as a whole. Policy CS6: Green Infrastructure makes detailed reference to this issue. This policy is cross-referenced in the supporting text to CS7.

Chapter 5: Core Policies Policy CS8: Heritage							
Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
English Heritage		Not specified	Not specified	No	<p>Welcomes the inclusion of a specific heritage policy however it does not properly address how the presumption in favour should be applied locally.</p> <p>Policy is generic.</p> <p>Policy contains some development management elements.</p> <p>Does not accord with NPPF in terms of conserving and enhancing the historic environment.</p>	<p>Policy should recognise the importance of Blackpool's historic environment and be specific to the area.</p> <p>Policy should incorporate the main priorities highlighted in the draft heritage strategy include the conservation, enhancement and preservation of the town's historic environment</p> <p>In addition the Policy could also outline policy/strategy/proposals that would:</p> <ul style="list-style-type: none"> <li>· Protect and enhance locally identified assets.</li> <li>· Enhance existing conservation areas of Stanley</li> </ul>	<p>The supporting text details the importance of Blackpool's heritage assets. The Built Heritage Strategy commenced preparation after the Core Strategy Proposed Submission was published. Reference to be included. Minor modification <b>MM015</b>.</p> <p>This information will be set out in the Built Heritage Strategy.</p>

**Chapter 5: Core Policies  
Policy CS8: Heritage**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
						<ul style="list-style-type: none"> <li>· Park and the Town Centre.</li> <li>· Identify areas for new designation as conservation areas.</li> <li>· Produce conservation area appraisals and management plans.</li> <li>· Develop a strategy to deal with the town's heritage assets at risk.</li> <li>· Promote heritage-led regeneration.</li> <li>· Update and maintain a register of locally important buildings.</li> <li>· Produce a Heritage Strategy for the long term maintenance and to secure the future of the town's historic environment.</li> <li>· Promote the use of design panels</li> </ul>	
English Heritage		Not specified	Not specified	No	Page 61 – The Plan should put forward a strategy for the Town's later 20 <sup>th</sup> Century buildings and identify those worth of preservation.	Amendment should be made to put forward a strategy which recognises the importance of Blackpool's later 20 <sup>th</sup> Century buildings.	This information will be set out in the Built Heritage Strategy. No change.
English Heritage		Not specified	Not specified	No	1 – It is unclear what this paragraph's aspiration for the town is. All development proposals must have a positive contribution on the historic environment including its significance and have regard to its unique character and identity. There does not appear to be a requirement for development proposals to meet the requirements of the NPPF on this matter and not just "respect and draw inspiration".	The Plan should be amended to detail a strategy for the long term conservation and enhancement of the historic environment, detailing elements that contribute to the unique character and identity of the town. These should be clearly outlined in this policy.	This Core Strategy policy sets out the strategic position with regards to Heritage. No change.
English Heritage		Not specified	Not specified	No	2 - Question whether this should form part of the Part 2 of the Local Plan	Amendments should be made to ensure the significance of Blackpool's heritage assets are conserved and enhanced and any harm minimised.	Comment noted. Minor Modification <b>MM012</b> .
English Heritage		Not specified	Not specified	No	3 – Appears to be a development management policy and does not have regards to NPPF in relation to the significance of heritage assets and the need to conserve and enhance.	Amendments should be made to reflect NPPF.	Comment noted. Minor Modification <b>MM012</b> .
English Heritage		Not specified	Not specified	No	4 – Does not provide adequate protection of the historic environment and does not provide a strong position in using 'seek to safeguard'.	Amendments should be made to ensure there is adequate protection for the historic environment and any harm should be minimised.	Comment noted. Minor Modification <b>MM013</b> .
English Heritage		Not specified	Not specified	No	5 – Welcomes reference to local list in the policy. However it does not forward a strategy for its use or implementation. There is also the opportunity to mention the Council's intention to prepare a heritage strategy.	Any supplementary planning documents should be endorsed within the Plan and reference made to the heritage strategy	<p>Additional information on Local List to be included in supporting text. Minor Modifications <b>MM014 and MM015</b>.</p> <p>The Built Heritage Strategy commenced preparation after the Core Strategy Proposed Submission was published. Reference to be</p>

**Chapter 5: Core Policies  
Policy CS8: Heritage**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
							included. Minor Modification <b>MM015</b> .

**Chapter 5: Core Policies  
Policy CS9: Water Management**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
NS&I/Rowland Homes	JLL	Not specified	Not specified	Yes	Policy CS9 is supported and reflects the changes in Government Policy where all energy and sustainability requirements for new residential developments should be addressed through the Building Regulations regime and that the Government is moving away from the Code for Sustainable Houses.	-	Support noted.
United Utilities		Not Specified	Not Specified	Not Specified	New development should manage surface water in a sustainable, effective and appropriate way. If it is demonstrated that it is necessary to discharge to a watercourse or public sewer, then any discharge should be at an attenuated rate.	Request amendment to bullet point (1e) to read: <b><u>'Where appropriate, not discharge surface water into the existing combined sewer network. If unavoidable, development must reduce the volume and rate of surface water run-off discharging from the site in to the combined sewer system by as much as is reasonably practicable;'</u></b>	The policy as currently worded is considered appropriate. No change.
United Utilities		Not Specified	Not Specified	Not Specified	Welcome the introduction of 5.143 however would like to emphasise the need to encourage new development to explore all methods for mitigating surface water run-off. Wherever possible, developers should look at ways to incorporate an element of betterment within their proposals as a means to reduce further the risk of flooding within the area. This approach is in accordance with paragraph 103 of the NPPF.	Suggest the following text should be included immediately after the surface water hierarchy (paragraph 5.142): <b><u>"On greenfield sites, applicants will be expected to demonstrate that the current natural discharge solution from a site is at least mimicked. On previously developed land, applicants should target a reduction of surface water discharge.</u></b>  <b><u>Landscaping proposals should consider what contribution the landscaping of a site can make to reducing surface water discharge. This can include hard and soft landscaping such as certain plant species which maximize leave cover. In seeking to most appropriately manage the impact of surface water run-off, developers will be expected to include</u></b>	The requested changes are already covered in the supporting text to this policy as well as policy CS6 Green Infrastructure. No change.

Chapter 5: Core Policies  
Policy CS9: Water Management

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
						<p><u>permeable materials. These measures are particularly important in a town like Blackpool which has an unusual drainage system where many surface water sewers and watercourses connect with the combined sewerage system, either directly or indirectly.</u></p> <p><u>The treatment and processing of surface water is not a sustainable solution. Surface water should be managed at source and not transferred. Every option should be investigated before discharging surface water into a public sewer. A discharge to groundwater or watercourse may require the consent of the Environment Agency."</u></p>	
Blackpool Pleasure Beach	RPS	Yes	Yes	No (not justified)	<p>Paragraph 5.134 - The 2006 Bathing Water Directive has been revoked and replaced by the Bathing Water Regulations 2013, which changes the way that water quality is measured and how this data is to be presented to the public.</p>	<p>Paragraph should reference the correct extant Regulations and makes provision for ensuring that its requirements can be met when it comes into force in 2015. Amend paragraph 5.134 to state:</p> <p><u>"The European Union's revised Bathing Water Directive (2006/7/EC) Bathing Water Regulations 2013 came into force in March 2006 July 2013, with all provisions coming into force by 24th March 2015, and has the overall objective to protect public health and the environment by improving the quality of bathing waters. The revised directive has more stringent water quality standards, a stronger beach management focus and new requirements for the provision of public information. It is therefore important that any new development does not cause deterioration in water quality which could impact on the Fylde Coast bathing waters. There are eight designated bathing waters along the Fylde Coast, with half of these located off the coast of Blackpool. Measures to retrofit SuDS where appropriate, including other infrastructure works necessary to meet the requirements of the Regulations, will be supported by the Council."</u></p>	<p>The 2013 Regulations do not replace the Directive. The Directive is European legislation and the Regulations are legislation for England and Wales that implement the Directive. An additional sentence has been added for clarity. Minor Modification <b>MM016</b>.</p> <p>Retrofitting SuDS is covered in paragraph 5.145.</p>

Chapter 5: Core Policies Policy CS10: Sustainable Design and Renewable and Low Carbon Energy							
Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
English Heritage		Not specified	Not specified	No	Fails to make reference to the historic environment. Would welcome the requirement for renewable proposals to avoid any impact on the historic environment.	Insert in point 3a <b>'heritage assets'</b>	The policy does not preclude heritage assets. The Core Strategy polices should be read as a whole. No change.
Home Builders Federation		Not specified	Not specified	No (not consistent with national policy)	Part 1c of the policy requires developments to include renewable and low carbon technologies within the development to order to meet their residual energy requirements. This is contrary to the stated Government position which clearly identifies the desire to reduce local standards. The Government's intention is to seek a Building Regulations only approach. The Council will, therefore, be unable to implement Part 1c of the policy.	-	The current policy approach is supported by the Council's evidence base. No change.

Chapter 5: Core Policies Policy CS11: Planning Obligations							
Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
English Heritage		Not specified	Not specified	No	There are opportunities for the enhancement of buildings which are on the National Heritage at Risk Register through planning obligations.  Policy would benefit reference to the historic environment.	Additional bullet 2c <b><i>'Opportunities to conserve and enhance the historic environment including heritage at risk are met'</i></b>	NPPF para 204 states that planning obligations should only be sought where they meet all of the following tests: <ul style="list-style-type: none"> <li>• necessary to make the development acceptable in planning terms;</li> <li>• directly related to the development; and</li> <li>• fairly and reasonably related in scale and kind to the development.</li> </ul> <p>The list in para 5.164 is not exhaustive and could apply if appropriate.</p> <p>No change.</p>
United Utilities		Not Specified	Not Specified	Not Specified	In accordance with paragraphs 156 and 162 of the NPPF, the Local Plan should include strategic policies to (inter alia) deliver the provision of infrastructure, and LPAs should work with other authorities and providers to assess the quality and impact on infrastructure.	The Core Strategy should include a specific policy in relation to local infrastructure provision or the following additional wording in CS11 (following para 162):  <b><i>'Once more details are known on development sites, for example, the location, the approach to surface water management and proposed connection points to the foul sewer network, it may be necessary to coordinate the delivery of</i></b>	Paragraph 5.161 covers this issue. Minor Modification <b>MM017</b> .

**Chapter 5: Core Policies  
Policy CS11: Planning Obligations**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
						<p><i>development with timing for the delivery of infrastructure improvements.</i></p> <p><i>At larger development sites, it may be necessary to ensure that the delivery of development is guided by strategies for infrastructure which ensure coordination between phases of development over lengthy time periods and by numerous developers.</i></p> <p><i>Blackpool Council will support the principle of investment in infrastructure to respond to development and environmental needs. Infrastructure is key to the delivery of sustainable development and economic growth and meeting the development needs of the Borough.'</i></p>	

**Chapter 6: Strengthening Community Wellbeing  
Policy CS12: Sustainable Neighbourhoods**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
English Heritage		Not specified	Not specified	No	1e – Does not accord with the requirements of the NPPF in terms of conserving and enhancing the built environment and reinforcing local identity and character.	Amend 1e to state: ' <b><i>Reinforces Blackpool's local identity and character whilst conserving and enhancing its historic environment and important heritage assets'</i></b> .	Reflecting local character/built heritage is inherent in first part of 1e - no change. Policy CS8: Heritage deals with conservation and enhancement of heritage assets; part 1e is in relation to new development enhancing the setting of assets within neighbourhoods. Minor Modification <b>MM020</b> to improve clarity.
Homes and Communities Agency		Not Specified	Not Specified	Not Specified	The HCA continues to support the Council's work in respect to the important redevelopment of Rigby Road and in outer estate priority neighbourhoods.	-	Support noted.
Blackpool Pleasure Beach	RPS	Yes	Yes	Yes	Support the regeneration and improvement of neighbourhoods in the inner area, which including South Beach.	-	Support noted.

**Chapter 6: Strengthening Community Wellbeing  
Policy CS13: Housing Mix, Density and Standards**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Home Builders Federation		Not specified	Not specified	No (not effective, not justified)	<p>Support a housing mix although the policy lacks sufficient flexibility to enable developers to respond to changing market and site conditions. This could stall development.</p> <p>Part 2 of the policy suggests that standards will be put in place for new build development which is clarified in para 6.24. This indicates that standards will be locally derived but based upon relevant national standards. Concern the Council has not set out its standards within the plan, as required by NPPF, therefore it is unclear what the costs and implications upon site viability will be. Also the setting of local standards is contrary to the Government's stated position of reducing local standards.</p>	<p>Part 1 of the Policy should provide greater flexibility</p> <p>Part 2 and its associated text should be deleted in its entirety.</p>	<p>Improving the mix and quality of Blackpool's housing is one of the fundamental Plan objectives.</p> <p>Part 1 refers to a general mix requirement as supported by the SHMA. This requirement – along with adopted local standards for conversions - was considered in the Viability Study (2014). Part 2 provides flexibility on whether standards for new homes will be set locally or nationally pending a decision by Government on this issue (as stated in para 6.25). The impact of introducing new standards on viability will be considered in due course. No change.</p>

**Chapter 6: Strengthening Community Wellbeing  
Policy CS14: Affordable Housing**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Home Builders Federation		Not specified	Not specified	No (not justified, not consistent with national policy)	<p>Support the exemption of the inner area from affordable housing contributions due to the viability implications.</p> <p>Support provision of affordable housing although concerns with:</p> <ul style="list-style-type: none"> <li>- The threshold for schemes of 3 units or more to contribute towards affordable housing is out of step with emerging national policy (with the Government intending to introduce a 10 unit threshold).</li> <li>- The level of affordable housing is considered too high and will have negative impacts upon scheme viability in large parts of Blackpool as identified in the Viability Study.</li> </ul> <p>Support the policy stance re. negotiation when viability is threatened by the policy requirements, although this should only be applicable on a handful of sites and should not be used to justify an unsustainable policy.</p>	<p>The Council should consider reducing its affordable housing requirement across the whole of the plan area or seek to do further work to provide a differential target for the areas outside of the inner area to account for viability issues.</p>	<p>Support for inner area exemption noted.</p> <p>Part 2b provides flexibility for the contribution level from 3-14 units to take account of various factors e.g. Government policy on thresholds if this emerges (as stated in para 6.34). The Viability Study acknowledges Blackpool's challenging market but considers the affordable housing targets outside the inner area to be generally viable (with part 1c providing flexibility to exception sites). No change.</p>

**Chapter 6: Strengthening Community Wellbeing  
Policy CS15: Health and Education**

No representations received.

**Chapter 6: Strengthening Community Wellbeing  
Policy CS16: Traveller Sites**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Wyre Council		Not specified	Not specified	Not specified	6.55 - Includes subjectivity which does not accurately reflect the GTAA 2007.	Amend 6.55 accordingly.	Comment noted. The GTAA 2007 has now been superseded by the 2014 GTAA. Wording will be amended to reflect this. Minor Modification <b>MM023</b> .
English Heritage		Not specified	Not specified	No	Fails to make reference to the historic environment. Welcome the requirement for new traveller sites to avoid impact on the historic environment.	Additional text inserted into 2c to refer to the historic environment.	The Core Strategy policies should be read as a whole. Heritage policy would apply in these circumstances.

**Chapter 7: Regenerating Blackpool Town Centre and Resort Core  
Policy CS17: Blackpool Town Centre**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Theatres Trust		Not specified	Not specified	No (not effective, not consistent with national policy)	Does not reflect points 70 and 125 of the NPPF for the protection of existing community and cultural facilities.  The policy focuses on the provision of new community and cultural facilities and does not provide criteria to protect existing cultural facilities.  Also no mention of the evening economy for which Blackpool is renowned.	Part 1 should reflect that Blackpool is first and foremost a holiday destination; the shopping destination is of secondary importance.  Part 1a should be about strengthening the tourist and visitor attractions by protecting and enhancing existing and the provision of new. Part 1b should then be to strengthen the retail offer.  Parts 1c must include the protection and enhancement of key entertainment and heritage assets especially those contributing to a vibrant evening economy.	Part 1 reflects its role as the main retail and service centre in the sub-region as well as an important leisure, cultural and business destination. No change.  Part 1a-g are not presented in a hierarchical order and include reference to existing assets in 1c. Minor Modification <b>MM025</b> for accuracy and clarity. Further support for leisure and tourism uses is set out in Policy CS21.  A Town Centre Strategy supports this policy and includes reference to evening economy. No change.
English Heritage		Not specified	Not specified	No	Bullet 1c - use of the word 'exploitation' does not accord with the requirements of NPPF.	Amend text to 'Conservation and enhancement of the key heritage assets within the town, centre.....'	Comment noted. Minor modification <b>MM025</b> for clarity.
English Heritage		Not specified	Not specified	Yes	Bullet 1e - welcomes the initiative to improve the quality of the built environment and the public realm.	-	Support noted.

**Chapter 7: Regenerating Blackpool Town Centre and Resort Core  
Policy CS17: Blackpool Town Centre**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
English Heritage		Not specified	Not specified	No	<p>Bullet 1g - The Plan would benefit from defining what it means by 'high quality (residential offer)'</p> <p>Blackpool has many neglected Victorian properties - former guest houses and HMOs. The Plan should put forward the need to retain this stock as it contributes towards the town's unique character and it should aim to refurbish the existing housing stock. The Plan also needs to look carefully at the hotel offer if the swathes of guest houses are out of fashion with visitors and can be refurbished as residential</p>	<p>The Plan needs to be amended to put forward a strategy for the Victorian properties that contribute to the historic environment in Blackpool.</p> <p>The Plan should be amended to clarify what "high quality" residential offer means.</p> <p>The Plan should also identify new sites for new hotels that provide the type of accommodation demanded by modern tourists.</p>	<p>Many former guest houses and HMOS are outside the town centre; other plan policies detail their suitability for conversion. A detailed plan for Victorian properties would be considered in a future Heritage Strategy.</p> <p>Housing quality is dealt with in other policies e.g. CS13. No need to repeat here.</p> <p>Other policies in Ch7 guide new hotel development to appropriate locations, including town centre strategic sites.</p>
English Heritage		Not specified	Not specified	No	<p>Para 7.5 - Welcome the Plan placing the Winter Gardens at the heart of a new quarter and recognition of the complex having an active role to play in regeneration. However, do not support a scheme to place retail at the heart of the regeneration of the Winter Gardens. Some retail that complements the proposed main new uses would be acceptable but not as the main plan for the Winter Gardens.</p>	<p>Delete reference to the regeneration of the Winter Gardens for retail use.</p>	<p>The intention in the plan is to promote complementary retail uses in the Winter Gardens. Minor Modification <b>MM026</b> for clarity.</p>

**Chapter 7: Regenerating Blackpool Town Centre and Resort Core  
Policy CS18: Winter Gardens**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Theatres Trust		Not specified	Not specified	No (not effective, not consistent with national policy)	<p>Does not reflect paragraphs 70 and 125 of the NPPF. Policy wording does not protect the existing Opera House theatre.</p>	<p>Reference should be made to the maintenance of existing entertainment venues within the complex and then provide criteria for new, with the default position to retain and improve. This reflects Para 70 of NPPF.</p>	<p>Comment noted. Minor Modification <b>MM029</b> for clarity.</p>
English Heritage		Not specified	Not specified	No	<p>2 – Does not accord with the requirements of the NPPF. Reference should be made to the Conservation Management Plan. The Plan also should refer to the need for this to be kept up to date. Any development proposals should be required to conform to this management plan as opposed to the conservation statement.</p>	<p>Bullet 2 of the policy should be amended to read "<b><i>Proposals must be presented in the context of a comprehensive approach which will minimise harm to this important asset and conserve and enhance the significance of the Winter Gardens. Any proposals will be required to conform to the Conservation Management Plan.</i></b>"</p>	<p>Comment noted. Minor Modification <b>MM028</b> to include reference to the Conservation Management Plan.</p>

**Chapter 7: Regenerating Blackpool Town Centre and Resort Core  
Policy CS18: Winter Gardens**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
					Any new theatre use, either in the Winter Gardens or in a new iconic attraction, should respond to research into the existing regional theatre offer thereby avoid damaging the viability of historic buildings such as the Grand Theatre.		Comment noted.
English Heritage		Not specified	Not specified	No	The Plan fails to refer to the building being on the national Heritage at Risk register. The policy should put forward a strategy to ensure that it will not appear on the register by the end of the Plan period.	The Plan should be amended to refer to Heritage at Risk.	Reference made the Heritage at Risk Register. Minor Modification <b>MM027</b>
English Heritage		Not specified	Not specified	No	7.12 and 7.13 - It would be useful to refer to the need for the Winter Gardens to be self-sustaining financially and that any income generated from the venue should be used to enhance and maintain this important heritage asset at risk.  The Plan incorrectly describes the Winter Gardens as 'the world's most complete Victorian all weather complex of theatres and conference facilities'. The Gardens were never designed as a Victorian conference facility.	The Plan should be amended to ensure that any future development of the Winter Gardens is financially self-sustaining and that any income generated should be used to sustain the long term future of the heritage asset.  The description of the Winter Gardens should be amended.	Not appropriate detail to include in the Core Strategy. No change.  This refers to the current collection of uses. No change.

**Chapter 7: Regenerating Blackpool Town Centre and Resort Core  
Policy CS19: Central Business District (Talbot Gateway)**

No representations received.

**Chapter 7: Regenerating Blackpool Town Centre and Resort Core  
Policy CS20: Leisure Quarter (Former Central Station Site)**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
English Heritage		Not specified	Not specified	No	Welcome this policy which puts existing historic assets at the heart of a new Leisure Quarter – most obviously the Winter Gardens.  Concerned by the lack of reference to Blackpool Tower and the piers, which should be highlighted as	This Policy and the Plan as a whole needs to reinforce the importance of Blackpool Tower and the three piers and put forward a long term strategy for its conservation and enhancement.	There appears to be a misunderstanding of this policy. The Leisure Quarter relates to a strategic development site in the town centre where comprehensive redevelopment of the entire site for major leisure development is being promoted. The site does not include Blackpool

**Chapter 7: Regenerating Blackpool Town Centre and Resort Core  
Policy CS20: Leisure Quarter (Former Central Station Site)**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
					<p>one of the key components of the Leisure Quarter and a commitment to maintaining their physical structure and role should be outlined in the Plan.</p> <p>The Plan should also refer to other leisure uses that the town could offer such as galleries, museums and casino.</p> <p>Whilst the ambition to deliver a third attraction of similarly iconic status to the Tower and Winter Gardens is impressive, the Plan needs to ensure that its main heritage assets are maintained and invested in to ensure their long term future. Also will this new development detract from these important assets thus threatening their sustainability?</p>		<p>Tower, the Winter Gardens or the piers although the impact of new development on relevant heritage assets is considered in the policy and a supporting Development Brief SPD.</p> <p>The Built Heritage Strategy will provide a detailed framework for the protection, conservation and enhancement of heritage buildings. No change.</p>
English Heritage		Not specified	Not specified	Yes	Bullet 2a - Welcome the acknowledgement that any new development in the Leisure Quarter must <i>'respond to Blackpool's historic townscape and character'</i>	-	Support noted.
Blackpool Pleasure Beach	RPS	Yes	Yes	No (not justified)	Additional guidance in the policy needs to be provided setting out what will not be acceptable on the site. This policy needs to make clear that this site should not be a location for a new amusement park in order to protect the Pleasure Beach (justified as the Pleasure Beach has provided information about its vulnerability as an attraction in previous representations).	The Policy should be reworded as follows:  <i>Bullet 3. Complementary leisure uses, hotel development, ancillary retail, parking and servicing that would add value and support the major leisure development will be permitted, <b>but major comparison retailing or amusement park development will not be permitted.</b></i>	With respect to additional guidance on acceptable uses, this is set out in the adopted Development Brief SPD (March 2011) which supports the strategic policy. No change.

**Chapter 7: Regenerating Blackpool Town Centre and Resort Core  
Policy CS21: Leisure and Business Tourism**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
English Heritage		Not specified	Not specified	Yes	<p>Fails to recognise the importance of the historic environment in building a strong and competitive economy and in ensuring its status as a top seaside resort through promotion of its leisure and tourism offer.</p> <p>The policy does not go far enough in identifying the historic environment and its priorities for the historic environment should be specifically mentioned in the</p>	This policy should be amended to recognise the importance of the historic environment for tourism and leisure in Blackpool and should be specific to the area.	The Core Strategy policies should be read as a whole. The importance of the historic environment is recognised throughout the Core Strategy and specifically the heritage policy. No change.

**Chapter 7: Regenerating Blackpool Town Centre and Resort Core  
Policy CS21: Leisure and Business Tourism**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
					policy.		
Bourne Leisure	NLP	Yes	Yes	No (not positively prepared, not consistent with national policy)	<p>Object to the emphasis in policy and supporting text for proposals for new high quality tourism attractions and new visitor accommodation to be focussed on the town centre, resort core and holiday accommodation areas.</p> <p>Para 7.32 - support for tourism should apply not only to the resort core and town centre core, but also to the wider area, in order to accord with NPPF policies on economic growth and tourism development.</p> <p>Para 7.35 - welcome reference to Marton Mere Holiday Village.</p> <p>Emerging Core Strategy policies for tourism-based regeneration in the resort and town centre should be placed within wider development plan policies promoting tourism-related development for the Borough as a whole.</p> <p>Borough-wide policies should support existing tourism operators, and allow them to retain and enhance their tourism offer, including the retention and enhancement of existing tourism accommodation, and acknowledge the importance of other visitor facilities, such as at Marton Mere Holiday Village.</p> <p>A new policy for promoting the enhancement of existing holiday parks should be introduced which would respond to an issue identified in the 2009 Fylde Coast Visitor Accommodation Study (bullet point 3), which raises a concern that current policy to restrict any increase in static caravan numbers at existing parks provides no incentive for park owners to increase their parks.</p>	<p>Proposes a new policy:</p> <p><b><u>The Council will:</u></b></p> <p><b><u>1. expressly support and encourage the retention, consolidation, enhancement, diversification and intensification/ expansion of existing holiday and caravan parks, subject to any necessary environmental/ other development control criteria, particularly where proposals improve the range and quality of accommodation and facilities on a site and result in permanent and significant improvements to the access, layout and appearance of the site and its setting in the surrounding landscape; and</u></b></p> <p><b><u>2. allow for operators to undertake a phased approach to consolidation, improvement, upgrading or extension of existing caravan sites and holiday parks over several years, ensuring that the existing accommodation and visitor operation are not disrupted and that each proposal caters appropriately for current and forecast needs and demands.</u></b></p>	<p>Part 2 of the policy refers to development outside the resort core and town centre.</p> <p>The reference to the evidence base made here was a recommendation relating specifically to Wyre Borough in the sub-regional Visitor Accommodation Study. A policy relating specifically to holiday/caravan parks is considered more appropriate as a Development Management policy and will be explored as part of the preparation of Site Allocations and Development Management Policies DPD.</p> <p>No change.</p>
Blackpool Pleasure Beach	RPS	Yes	Yes	Yes	Supportive of this policy which supports tourism development at existing attractions, allows for hotel development in the resort core, and generally aims to keep the resort core areas attractive for tourists, whilst allowing for some loss of accommodation outside the main holiday accommodation areas.		Support noted.

**Chapter 7: Regenerating Blackpool Town Centre and Resort Core  
Policy CS21: Leisure and Business Tourism**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
					Consider the correct procedures have been followed and it has had regard to the National Planning Policy Framework.		

**Chapter 7: Regenerating Blackpool Town Centre and Resort Core  
Policy CS22: Key Resort Gateways**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Blackpool Pleasure Beach	RPS	Yes	Yes	No (not justified)	The Council has made a number of changes to this policy as a result of previous representations, including improving the arrival experience and signage, which are welcomed. However, do not consider that the need to protect existing parking levels has been dealt with satisfactorily. This matter is relegated to the supporting text and it needs to be more unequivocal, as the current statement in para 7.39 does not provide the clarity needed that the existing level of parking will be retained.	Insert additional text: <b><u>4. Any change in parking provision as a result of major redevelopment must not undermine the resort's ability to accommodate visitor trips, and every development proposal must demonstrate how it will ensure no loss in the overall number of car parking spaces, and that any re-provision of spaces in a different location is as accessible to the major attractions as the provision that is being replaced.</u></b>	The Council considers that the current wording in para 7.39 (amended in response to previous comments received) is a more accurate reflection of future parking needs of the resort. As policy CS5 addresses parking capacity it is not considered necessary to detail parking in this policy also. No change.

**Chapter 7: Regenerating Blackpool Town Centre and Resort Core  
Policy CS23: Managing Holiday Bed Spaces**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Mr Panek		Not specified	No	Not specified	The South Blackpool Holiday Accommodation Area boundary should be amended as Palatine Road is now a mixture of holiday and residential accommodation.	-	Comment does not relate to the Duty to Co-operate. This strategic policy does not detail the holiday accommodation area boundaries; these are set out in a supporting Holiday Accommodation SPD which was subject to consultation prior to adoption in 2011. The boundaries can be revised through a formal review of the SPD if this is supported by evidence. No change.
Memphis Hotel		Not specified	No	Not specified	The South Blackpool Holiday Accommodation Area boundary should be amended as Palatine Road is now a mixture of holiday and residential accommodation.	-	Comment does not relate to the Duty to Co-operate. This strategic policy does not detail the holiday accommodation area boundaries; these are set out in a supporting Holiday Accommodation SPD which was subject to consultation prior to adoption in 2011. The

**Chapter 7: Regenerating Blackpool Town Centre and Resort Core  
Policy CS23: Managing Holiday Bed Spaces**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
							boundaries can be revised through a formal review of the SPD if this is supported by evidence. No change.
Chadsley Hotel		Not specified	No	Not specified	The South Blackpool Holiday Accommodation Area boundary should be amended as Palatine Road is now a mixture of holiday and residential accommodation.	-	Comment does not relate to the Duty to Co-operate. This strategic policy does not detail the holiday accommodation area boundaries; these are set out in a supporting Holiday Accommodation SPD which was subject to consultation prior to adoption in 2011. The boundaries can be revised through a formal review of the SPD if this is supported by evidence. No change.

**Chapter 8: Enabling South Blackpool Growth and Enhancement  
Policy CS24: South Blackpool Employment Growth**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Fylde Council		Not specified	Not specified	Not specified	Figure 18 - Notes that 5. Whitehills appears to illustrate the employment land allocations in the adopted local plan 1996-2006 (Alterations review 2005). The Fylde Preferred Option included proposed allocations for employment land in this area.	-	Comment noted. This map is indicative to show the location of the existing Whitehills Estate as currently defined in relation to Blackpool Borough.
Fylde Council		Not specified	Not specified	Not specified	Para 8.16 - Comments that Fylde Council do not specify precisely where this provision is to be made, nor does it commit to it being close to M55 J4.		Comment noted. Minor modification <b>MM030</b> for clarity.
Wyre Council		Not specified	Not specified	Not specified	Any proposals should not undermine the established Hillhouse International Business Park including highway and transport matters.		The Duty to Co-operate highlights Hillhouse as a strategic site where economic development will be promoted.  In relation to highways and transport, Blackpool Council is working jointly with Lancashire County Council, Fylde and Wyre Councils on the Fylde Coast Highways and Transport Masterplan which is addressing such matters.  Policy CS24 specifically deals with South Blackpool. No change.
Bourne Leisure	NLP	Yes	Yes	Yes	Notes that there is an allocation for employment uses on the Preston New Road site (Site 3 of Figure 18). This site is directly adjacent to the Marton Mere	-	Support for soundness noted.  These comments were also made by the

**Chapter 8: Enabling South Blackpool Growth and Enhancement  
Policy CS24: South Blackpool Employment Growth**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
					Holiday Village. Proposals on this site will need to be carefully assessed and if taken forward, designed in a way that does not detract from the amenity and enjoyment of the adjacent holiday village, nor cause unacceptable cumulative traffic impact and retain the current access arrangements to the Holiday Village.		respondent in an earlier consultation response (Revised Preferred Option); and the Council's response is set out in the Consultation Statement (June 2014). No change.
NS&I/Rowland Homes	JLL	Not specified	Not specified	No (not effective)	<p>Whilst the identification of South Blackpool as an appropriate location to attract new economic development is supported, it is considered that the evidence base which underpins the policy is out of date and unsound. The Council should critically re-examine their employment land portfolio given the ability of other land and premises available, particularly Whitehills Industrial Estate.</p> <p>Based upon a market appraisal the prospects of delivering the entire NS&amp;I Site on Mythop Road for employment within the Core Strategy period is remote.</p>	Policy CS25 (2) and Figure 10 should be amended to identify the NS&I site specify that higher value uses will be permitted in order to facilitate the redevelopment of the existing site for high quality modern business facilities in a sustainable location.	<p>These comments/changes sought were also suggested by the respondent in an earlier consultation response (Revised Preferred Option); and the Council's response is set out in the Consultation Statement (June 2014). No change.</p> <p>The Council is working with the respondent to consider viable development opportunities to secure the long term future of the site in line with Policy. The 2013 Employment Land Study reflects this position.</p>

**Chapter 8: Enabling South Blackpool Growth and Enhancement  
Policy CS25: South Blackpool Housing Growth**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
NS&I/Rowland Homes	JLL	Not specified	Not specified	No	The policy should recognise and specifically identify sites where there is potential for redevelopment for housing or mixed use development.	Policy CS25 should identify the NS&I site at Mythop Road as a mixed use site, which has potential for the development of higher value uses, permitted in order to facilitate the retention of NS&I presence on the site and the redevelopment of the existing site for employment.	<p>These comments/changes sought were also suggested by the respondent in an earlier consultation response (Revised Preferred Option); and the Council's response is set out in the Consultation Statement (June 2014). No change.</p> <p>The Council is working with the respondent to consider viable development opportunities to secure the long term future of the site in line with Policy.</p>
United Utilities		Not specified	Not specified	Not specified		<i>Amend Part 2 of the policy: 'The Council will work with Fylde Borough Council, the Environment Agency and utility providers to ensure that any housing development on adjoining lands around Junction 4 of the M55 will not most appropriately manages the impact on the existing surface water and waste</i>	Comment noted. Minor modification <b>MM031</b> .

**Chapter 8: Enabling South Blackpool Growth and Enhancement  
Policy CS25: South Blackpool Housing Growth**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
						<i>water network within Blackpool.'</i>	
United Utilities		Not specified	Not specified	Not specified	<p>The supporting text to Policy CS25, namely paragraph 8.21, recognises that there are infrastructure limitations in South Blackpool with respect to surface water and Waste water management, which has been highlighted by UU and the EA. The impact on the sewer network will be better understood once more details are known about the development proposals.</p> <p>In light of the limitations associated with the existing infrastructure provision in the area recommend introducing additional wording to the supporting text.</p>	<p>Insert new wording after 8.21: <b><u>"In some circumstance it may be necessary to coordinate the delivery of new development with the delivery of future infrastructure. United Utilities requests that developers and landowners engage with infrastructure providers at an early stage to understand the impact of development on existing infrastructure with details of their drainage strategy for development sites. United Utilities requests that developers produce drainage strategies for each phase of development in agreement with the LPA, United Utilities and the Environment Agency. Once these details are received the impact on the sewer network will be better understood.</u></b></p> <p><b><u>It is prudent that developers and landowners keep United Utilities informed of realistic and achievable delivery timescales for development. It will be necessary to ensure drainage infrastructure is delivered in a holistic and coordinated manner as part of an overall strategy between phases of development and between developers. The delivery of development as part of an overall strategy and the early receipt of details allow the impact of development on infrastructure to be determined with improved accuracy."</u></b></p>	The policies are to be read as a whole and this text relating to water management is set out in Policy CS9 as well as introductory text to Chapter 8. It is therefore not considered necessary to repeat it here.

**Chapter 8: Enabling South Blackpool Growth and Enhancement  
Policy CS26: Marton Moss**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Mrs Rooney		Yes	Yes	No (not justified)	Policy is too restrictive and focuses too much on the needs for agricultural purposes. Small scale housing development on infill plots will maintain the Moss character whilst allowing for new houses.	Relax the rules regarding new dwellings to allow sustainable development in areas where land has not been used for agricultural purposes in order to enhance the area without waiting for	The current wording is considered appropriate prior to the development of a neighbourhood plan.

Chapter 8: Enabling South Blackpool Growth and Enhancement  
Policy CS26: Marton Moss

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
						the neighbourhood planning process.  Insert into 8.24 <i><u>'However, prior to the neighbourhood planning process, where there is fallow or disused land on a highway frontage with existing dwellings, development will be permitted in order to enhance the landscape'</u></i> .	
CW Planning Solutions		Not specified	Not specified	No (not justified, not effective, not consistent with national policy)	Policy is at odds with NPPF para 55 which allows the reuse of redundant/disused buildings.	Policy should contain paragraph 55 of NPPF.	<b>Comment noted.</b> Minor modification <b>MM032</b> .

Chapter 8: Enabling South Blackpool Growth and Enhancement  
Policy CS27: South Blackpool Transport and Connectivity

No representations received
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General Plan Comments							
Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Environment Agency		Yes	Yes	Yes	<p>Has worked closely with the Council in developing evidence and policies. In addition, EA are also a member of the Fylde Peninsula Water Management Group, chaired by Blackpool Council, which is working to further improve the Bathing Waters in the area. Feel that the Duty to Co-operate has been met.</p> <p>Considers that any legal and procedural requirements have been complied with in the preparation of the Core Strategy.</p> <p>Considers the Core Strategy has been prepared in accordance with the National Planning Policy Framework and the evidence used for those issues related to the Environment Agency is suitable.</p>	None	Support noted.
Ribble Valley Borough Council		Not Specified	Not Specified	Not Specified	No specific representations.	-	Comment noted.
Lancashire County Council Archaeology Service		Not Specified	Not Specified	Not Specified	No objection raised.	Suggest that a glossary of terms would be helpful.	It is not considered necessary to include a glossary. No change.
English Heritage		Not Specified	Not Specified	Not Specified	There is insufficient evidence relating to the historic environment.	Strong evidence base needed.	There are a number of evidence base documents that have informed the Core Strategy including a number of heritage related studies.
The Trees Residents Association		Not Specified	Not Specified	Not Specified	Supportive of the Core Strategy.	-	Support noted.
Home Builders Federation		Not Specified	Not Specified	No	Approach to producing multiple Local Plan documents is unsound as it is not consistent with national policy.	-	It is common practice for LPAs to prepare more than one Local Plan document.
Home Builders Federation		Not Specified	Not Specified	No	The Plan period end in 2027 which will not provide as 15 year time horizon beyond adoption which is contrary to NPPF.	-	Paragraph 157 of NPPF states that Local Plans should be drawn up over an <u>appropriate</u> time scale, <u>preferably</u> a 15 year time horizon.
Home Builders Federation					Unconvinced that the duty has been adequately discharged in relation to housing. The HBF does not consider that silence on all sides represents full compliance with the duty.	-	The housing figures set out in Policy CS2 are based on robust up-to-date evidence. Further justification is given in the Housing Technical Paper (June 2014)

**General Plan Comments**

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
					<p>Whilst Wyre and Fylde are behind Blackpool in the production of their Plans, the most recent consultations suggest their preferred housing requirements are 306dpa (Fylde Preferred Options 2013) and 219dpa (Wyre Preferred Options 2012). In combination the three authorities annual housing requirement equates to 805dpa. This is 85dpa short of the lowest range suggested by the SHMA.</p> <p>The Plan should not proceed in its current format. Prior to submission the Council should discuss the regional shortfalls with its neighbours and come to a common understanding regarding how the housing requirements will be delivered.</p>		The Wyre Preferred Option and Fylde Preferred Options both pre-dated the most recent SHMAA for the sub-region. Blackpool Council is aware that both authorities are reviewing their housing figures in light of the updated evidence base.
South Ribble Borough Council		Yes	Yes	Yes	Considers the document to be legally compliant and sound.	None	Support noted.
The Co-operative Group		Yes	Yes	No (not positively prepared, not justified, not consistent with national policy)	Provides comprehensive justification why the former Co-op Sports and club site should no longer be allocated as 'Playing Fields and Sports Grounds' and should be allocated for housing.	Re-allocate the site for housing.	This issue will be covered as part of the Site Allocation and Development Management DPD and not by the strategic Core Strategy strategic policies.
Homes and Communities Agency		Not Specified	Not Specified	Not Specified	Generally supportive of the strategic approach; pleased to note a number of policies will help to support the future delivery of schemes in which the HCA has been involved. Some of the key evidence and strategies informing the Local Investment Plan for the Fylde Coast have also informed the production of the Core Strategy. The HCA looks forward to working with the Council to deliver and enable local priorities.	-	Support noted.
United Utilities		Not Specified	Not Specified	Not Specified	Will continue to work with the Council during the Local Plan process to develop a co-ordinated approach for delivering sustainable growth in sustainable locations; and to identify any infrastructure issues and appropriate resolutions. When more information is made available on the locations for development (in the Site Allocations and Development Management document) it may be	-	Comment noted. The Council will continue to work with United Utilities during the preparation of the Site Allocations and Development Management DPD.

### General Plan Comments

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
					necessary to co-ordinate delivery of new development with infrastructure through detailed policies (suggest this is included as a development management policy). UU wish to undertake further discussions with the Council on technical matters relating to site-specific development, such as site specific drainage and the surface water hierarchy, once individual allocations are identified.		

### Other Comments

Respondent	Comment	Officer Comment
Westby-with-Plumpton Parish Council	Consideration should be given to the development of brownfield sites. This would enhance Blackpool and negate the need to encroach into other parishes.	Due the highly urbanised nature of Blackpool, the majority of development is on brownfield land. For example, of the 154 sites identified as potential supply in the SHLAA, 121 are previously developed land.
Westby-with-Plumpton Parish Council	Any environmental effects on the parish should be considered including flooding and highways.	Any proposed development would be required to accord with Core Strategy and saved Local Plan policies relating to flooding and highways.
Westby-with-Plumpton Parish Council	Asks whether there is any social housing proposed for the development	Any proposed development would be required to accord with Policy CS14 Affordable Housing.
Wescoe Hotel	Supportive of the Core Strategy. Concerned that many hotels are converting into HMOs.  Suggests the development of a multi-use Arena for conferences and concerts would be positive for Blackpool.	Support noted. The Council has a number of mechanisms in place to prevent changes of use to HMOs : <ul style="list-style-type: none"> <li>▪ It is a high priority for the Council's Planning and Housing Enforcement Teams.</li> <li>▪ Planning policy explicitly states that planning permission will not be granted for any new HMO uses.</li> <li>▪ The New Homes from Old Places SPD has improved the Council's standards for conversions of holiday accommodation to residential use.</li> </ul> The Core Strategy does not preclude this type of use for sites such as the Leisure Quarter.
Malcolm Hicks	What are the plans and proposals in relation to public transport?	Not directly Core Strategy related. Policy CS5 'Connectivity' sets out the measures to improve Blackpool's public transport network. A separate letter was sent on 16th July providing Mr Hicks with further information on detailed public transport proposals.

## Supporting Documents

Sustainability Appraisal		
Respondent	Comment	Officer Comment
Fylde Council	All references to the Fylde Core Strategy should be replaced with Fylde Local Plan	Comment noted.
Fylde Council	Page 38, Strategic Objective 17 - No final decision has yet been made by Fylde Council whether to promote development these lands in Fylde. The document should be clear when referring to lands close to junction 4 of the M55, whether it is referring to land in Blackpool or Fylde.	This objective reflects the wording of the Core Strategy. Further detail is provided in Chapter 8 of the Core Strategy document.
Fylde Council	Page 42, Para 2 - A sustainable extension would be dependent upon the agreement with Fylde.	Comment noted.
Fylde Council	Page 53, last Para - This is a bold statement which promotes development of wider land presumable in Fylde.	Comment noted.
Fylde Council	Page 54, Para 3 - This commentary appears to relate to policy CS24.	Comment noted.
Fylde Council	Page 57, Table 5.9 under 'Townscape and landscape quality in the borough' para 3 of Causes states "Development to the south of Blackpool would be a natural extension to the existing function of the area, and all development would reflect the existing character."  Clarity is needed with regard to what the 'area' is. Is it referring to land located within the Blackpool boundary or land located within Fylde Borough, or both?	Comment noted.
Natural England	Agrees with the SA conclusions. Notes some unresolved uncertainties. These negative and uncertain effects should be explored further as avoidance/mitigation measures may be required in order to reduce harm to the environment.	Comment noted.
English Heritage	CS6 Green Infrastructure - Disagrees with the SA conclusion which states that the policy will contribute partially to the achievement of the SA objective on heritage. Green infrastructure is an important component of the historic environment and opportunities to enhance it should be promoted. Without the inclusion of this within the policy, it is considered that it will have a negative impact on the historic environment and on the achievement of the SA Objective on Heritage.	The Sustainability Appraisal has been undertaken by an independent consultant with significant experience in the SA/SEA field.
English Heritage	CS8 Heritage - Disagree with the SA conclusion that the proposed policy on heritage will have a major positive impact on the historic environment. The NPPF requires that Plan policies should contain a positive strategy for the historic environment and how the presumption in favour of sustainable development should be applied locally. The policy is generic and does not put forward a long term strategy for the conservation and enhancement of the historic environment. Therefore, the Local Plan policy is considered to have a major negative impact on the historic environment in Blackpool and on the achievement of the SA Objective on Heritage.	The Sustainability Appraisal has been undertaken by an independent consultant with significant experience in the SA/SEA field.
English Heritage	CS10 Sustainable Design - Disagree with the SA conclusion that there is no relationship with the SA Objective on Heritage. The policy appears to consider the impact on the local environment, landscape character and visual appearance but not the historic environment. Therefore, this policy cannot demonstrate that it minimises the harm to the significance of the historic environment in Blackpool. As a result it is considered to have a major negative impact on the achievement of the SA Objective on Heritage.	The Sustainability Appraisal has been undertaken by an independent consultant with significant experience in the SA/SEA field.
English Heritage	CS11 Planning Obligations - Disagrees with the SA conclusion that there is no relationship with the SA Objective on Heritage. Blackpool has a number of buildings on the Heritage at Risk Register and together with the historic environment (e.g. public realm) there are opportunities for enhancement through planning obligations. Therefore, this policy cannot demonstrate that it puts forward a positive strategy for the historic environment and as a result is	The Sustainability Appraisal has been undertaken by an independent consultant with significant experience in the SA/SEA field.

	considered to have a major negative impact on the achievement of the SA Objective on Heritage.	
English Heritage	CS16 Traveller Sites - Disagree with the SA conclusion that there will be a combination of both positive and negative impacts on the SA Objective on Heritage. The policy fails to put forward a requirement for new traveller sites to consider the impact on the historic environment. Therefore, this policy cannot demonstrate that it minimises the harm to heritage assets in Blackpool and as a result is considered to have a major negative impact on the achievement of the SA Objective on Heritage.	The Sustainability Appraisal has been undertaken by an independent consultant with significant experience in the SA/SEA field.
English Heritage	CS17 Blackpool Town Centre - Disagree with the SA conclusion that the policy on Blackpool Town Centre will have a positive impact on the SA Objective on Heritage. The starting point for the historic environment in Blackpool should be the need to conserve and enhance its assets and those at risk; the policy does not do this. Therefore, it is considered to have a negative impact on the achievement of the SA Objective on Heritage.	The Sustainability Appraisal has been undertaken by an independent consultant with significant experience in the SA/SEA field.
English Heritage	CS18 Winter Gardens - We disagree with the Sustainability Appraisal conclusion that the policy on the Winter Gardens will have a positive impact on the SA Objective on Heritage. The Plan refers to a conservation statement but needs to correctly refer to proposals conforming to an up to date conservation management plan. The Plan also assumes that conversion to retail use would be the most acceptable which English Heritage opposes. The Policy places the Winter Gardens at the heart of a new regeneration quarter in the town which is supported. However, the Policy does need to consider the long term strategy for the building. Therefore, it is considered that this policy will have both positive and negative impacts on the achievement of the SA Objective on Heritage.	The Sustainability Appraisal has been undertaken by an independent consultant with significant experience in the SA/SEA field.
English Heritage	CS20 Leisure Quarter - Disagree with the SA conclusion that the policy on the Leisure Quarter will have a positive impact on the SA Objective on Heritage. The Policy (and the Plan in general appears to lack a mention of Blackpool Tower, which should be a key component of this Policy (and the Plan) also the three piers. There should be a commitment to maintaining the physical structure of the Tower and the three piers and their role in the town's economy. The ambition to deliver a third attraction of similar iconic status to the above, needs to be balanced with the long term sustainability of the town's iconic and important assets. The lack of a clear strategy within this policy (and the Plan) means that there is a major negative impact on the achievement of the SA Objective on Heritage.	The Sustainability Appraisal has been undertaken by an independent consultant with significant experience in the SA/SEA field.
English Heritage	CS21 Leisure and Business Tourism - We disagree with the Sustainability Appraisal conclusion that the policy on Leisure and Business Tourism will have a positive impact on the SA Objective on Heritage. The policy fails to recognise the importance of the historic environment in building a strong and competitive economy (NPPF) and in ensuring its status as a top seaside resort. Therefore, it is considered that this policy has a major negative impact on the achievement of the SA Objective on Heritage.	The Sustainability Appraisal has been undertaken by an independent consultant with significant experience in the SA/SEA field.
Home Builders Federation	The SA has not considered the outputs from the SHMA (specifically the impacts of the objectively assessed need scenarios proposed).	The Housing Technical Papers (2012 and 2014) provide robust justification for the Council's annual housing figure, considering different options. Justifications made based on the need to align with realistic employment forecasts, achievable delivery rates The SA regulation

Habitats Regulation Assessment		
Respondent	Comment	Officer Comment
Natural England	<p>Advises that the Council should assess the likely effect of all proposed development in the Neighbourhood Plan Area to ensure it can be accommodated without resulting in significant adverse effects on European Sites.</p> <p>Where a Neighbourhood Plan could potentially lead to environmental effects it will be necessary to screen the Plan in relation to the 2010 Habitats and Species regulations and the 2004 EA regulations. Measure may need to be incorporated into the Neighbourhood Plan to ensure that any likely significant effects are avoided.</p> <p>A further assessment should focus on the issues of recreational disturbance of Annex 1 bird foraging sites.</p> <p>Suggest a specific policy for Whyndyke and other relevant allocations in South Blackpool in order to guide development.</p>	<p>Site specific policies will be considered as part of the Site Allocations and Development Management DPD.</p> <p>Any future DPDs and Neighbourhood Plans would be subject to HRA screening.</p>

**Draft Statement of Compliance with the Duty to Co-operate**

Respondent	Comment	Officer Comment
Lancashire County Council	<p>Reference should be made to the Blackpool Airport Infrastructure Liaison Group</p> <p>The Statement should have regard to the adopted Joint Lancashire and Blackpool Local Flood Risk Management Strategy. The Strategy was formally adopted by Lancashire County Council on 9 April 2014 following public consultation and subsequent cabinet member sign off. The strategy has also been formally signed off by Blackpool Council's decision making process and is therefore no longer a draft strategy. It holds the equivalent weighting of a Supplementary Planning Document (SPD); it is therefore a material consideration in the planning process. Specifically, the Blackpool Core Strategy should have regard for the Strategy's nineteen objectives that both LCC and Blackpool Council (BC) are committed to delivering and for the potential for partnership working to help deliver these objectives.</p> <p>The Statement should refer to both Blackpool Council and Lancashire County Council's role as a Lead Local Flood Authority (LLFA) for their respective administrative area. As a LLFA it is recommended that Blackpool Council place emphasis on flooding from "local" sources (surface water, groundwater and flooding from ordinary watercourses) through the planning policy framework. The Flood and Water Management Act 2010 provides a number of new duties and responsibilities for LLFAs, the introduction of which, could impact on future development decisions.</p>	<p>Comments noted.</p> <p>Reference to the Blackpool Airport Infrastructure Liaison Group under the transport section will be included.</p> <p>Text will be updated to reflect the fact that the Joint Lancashire and Blackpool Local Flood Risk Management Strategy is formally adopted.</p> <p>Reference will be made to the fact that both Blackpool and Lancashire are Lead Local Flood Authorities.</p>
HCA	<p>Considers the Council has co-operated with the HCA in compliance with the Duty to Co-operate and are comfortable with the strategic issues and evidence of co-operation in Table A of the document.</p>	<p>Comments noted. No amendments required.</p>
Fylde	<p>Considers that Blackpool Council has complied with the guidance set out in the National Planning Policy Framework (the NPPF) "on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156" (p37, NPPF).</p> <p>Agrees that ongoing collaboration is taking place between the three Fylde Coast authorities and Lancashire County Council on the preparation of the Fylde Coast Highways and Transport Masterplan.</p> <p>Agrees that ongoing dialogue is taking place between Blackpool Council (and the other two councils that make up the Fylde Coast Authorities) and the Lancashire Local Economic Partnership (LEP), through the quarterly Duty to Co-operate officer meetings, and through the preparation of the Strategic Economic Plan (SEP). In addition, good progress is being achieved by the Blackpool, Fylde and Wyre Economic Development Company in the preparation of the Fylde Coast Local Growth Accelerator Strategy and Action Plan.</p> <p>Agrees with Blackpool Council at paragraph 3.15 of the Statement of Compliance with the Duty to Co-operate that "there are some cross boundary strategic issues which require continued collaboration and monitoring to demonstrate the legal compliance aspect of the Duty and the soundness aspects of the Duty" and that this is in line with paragraph 182 of the NPPF. To this end, Fylde Council has agreed to accommodate around 14 ha of Blackpool's unmet employment land requirement through strategic land allocations in the emerging Fylde Local Plan (Part 1).</p> <p>Supports Blackpool Council's comments in Table A (page 10) that "Blackpool Council will work with Fylde and Wyre Councils in meeting the needs of Travellers and Travelling Showpeople across the Fylde coast sub-region, to ensure the requirements set out in the 2014 GTAA are met through the local plan preparation".</p> <p>Supports Blackpool Council's comment in Table A (page 11) that "The Core Strategy supports wider strategic improvements to [the transport] infrastructure in South Blackpool on the Blackpool / Fylde boundary benefiting sub-regional connectivity".</p> <p>Supports Blackpool Council's comment in Table A (page 12) that "Ongoing collaboration with neighbouring authorities, LCC, EA and UU to ensure the required water-related infrastructure is delivered".</p> <p>Supports Blackpool Council's comment in Table A (page 13) that "Blackpool will be accommodating some of the secondary educational needs of</p>	<p>Comments noted, no amendments required.</p>

**Draft Statement of Compliance with the Duty to Co-operate**

<b>Respondent</b>	<b>Comment</b>	<b>Officer Comment</b>
	<p>the proposed housing located within that part of the Whyndyke Farm site that lies within Fylde. Collaboration is ongoing to finalise the nature of this contribution”.</p> <p>Fylde Council supports Blackpool Council’s comment in Table A (page 13) regarding the natural environment: “The importance of land to the south of Blackpool around Whyndyke and Whitehills in Fylde is acknowledged in the HRA as important for foraging Annex 1 bird species”. Level of co-operation.</p> <p>Fylde Council raises no objection to the level of co-operation undertaken by Blackpool Council, which is set out in the Statement of Compliance with the Duty to Co-operate.</p> <p>It is considered that the draft Statement of Compliance accurately reflects the engagement that Blackpool Council has undertaken with Fylde Council.</p>	
Ribble Valley Council	Considers that Blackpool Council has complied with the requirements of the Duty to Co-operate in relation to liaison with Ribble Valley Council.	Comment noted, no amendments required.
Wyre Council	<p>Considers that Blackpool Council has complied with the guidance set out in the National Planning Policy Framework on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156.</p> <p>Agrees that Blackpool Council has worked with Fylde and Wyre Councils, in the preparation of joint key evidence base documents. Ongoing collaboration has also taken place between the three Fylde Coast authorities and Lancashire County Council in relation to the preparation of the Fylde Coast Highways and Transport Masterplan.</p> <p>Raises no objection to the level of co-operation undertaken by Blackpool Council, which is set out in the draft Statement of Compliance with the Duty to Co-operate and it is considered that the document accurately reflects the engagement that Blackpool Council has undertaken with Wyre Council.</p>	Comments noted. Minor amendment to text under Employment Land Delivery section responding to comments made by Wyre under Policy CS24.

**Infrastructure and Delivery Plan**

<b>Respondent</b>	<b>Comment</b>	<b>Officer Comment</b>
Fylde Council	Para 2.2.2 recognises sub-regional infrastructure including the M55 to Norcross link road; however this is not detailed further on in the document. Further reference needed in the transport section.	Comment noted. Additional information included in para 3.1.10.
Fylde Council	3..1.19 – Further information is required on the south Fylde line	Comment noted. Additional information included in para 3.1.20.
Fylde Council	References to Fylde Core Strategy should be amended to ‘Fylde Local Plan’.	Comment noted. IDP updated accordingly.

Fylde Council	Paras 2.3.1 and 2.3.2 refer to South Blackpool. Please note that Fylde Council are reappraising options for development as part of their Local Plan.	Comment noted. Para 2.3.2 has been amended to align with Policy CS1.
Fylde Council	3.1.23 - Concerned that this is too strong a statement and appears to pre-determine proposed development at the Airport. Suggests para 8.13 of Core Strategy more appropriate wording.	Comment noted. Para has been amended 3.1.24 and 3.1.25 of the IDP now reflects the Core Strategy text.
Fylde Council	3.10.10 – Please note that Fylde Council are reappraising options for development at South Blackpool as part of their Local Plan.	Comment noted. Para 3.10.10 has been amended.
Fylde Council	4.6.3 – Number of dwellings should be clarified as no planning permission is yet to be granted in the site	Comment noted. Wording amended in para 4.6.3.
Fylde Council	Figure 20 - Caveat required saying that the study was based on hypothetical development locations.	Comment noted. Reference now made to hypothetical development locations in paras 4.6.36 and Figure 20.