

# Blackpool Local Plan Part 1: Core Strategy

Copies of Representations made on the Proposed Submission  
(in accordance with Regulation 20)



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<b>Ref No.</b>	<b>Name/Organisation</b>
01	Environment Agency
02	Ribble Valley Borough Council
03	LCC Archaeology (Lancashire County Council)
04	Fylde Borough Council
05	Theatres Trust
06	Mr Stanley Chadsley Hotel
07	Mr Johnson Memphis Hotel
08	Mr Malcolm Hicks
09	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

Blackpool Borough Council  
Development Plans & Projects  
PO Box 77  
Blackpool  
Lancashire  
FY1 1AD

**Our ref:** NO/2012/103892/CS-  
02/SB1-L01

**Your ref:**

**Date:** 11 August 2014

Dear Sir/Madam

## **BLACKPOOL LOCAL PLAN PART 1: CORE STRATEGY - PROPOSED SUBMISSION**

Thank you for consulting us on the above, which we received on 4 July 2014. We would like to offer the following comments:

### **Duty to Co-operate**

We have worked closely with the Council in developing evidence and policies. In addition to this we 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. Therefore, we feel that the Duty to Co-operate has been met.

### **Legal and Procedural Compliance**

We consider that any legal and procedural requirements have been complied with in the preparation of the Core Strategy.

### **Soundness**

The Core Strategy has been prepared in accordance with the National Planning Policy Framework and we consider that the evidence used for those issues in our remit is suitable.

Yours faithfully

**Mr Dave Hortin**  
**Planning Advisor - Sustainable Places Team**

Direct e-mail [dave.hortin@environment-agency.gov.uk](mailto:dave.hortin@environment-agency.gov.uk)

Environment Agency  
Lutra House Walton Summit, Bamber Bridge, Preston, PR5 8BX.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)  
End

**Tracy Shand**

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**From:** Diane Neville [Diane.Neville@ribblevalley.gov.uk]  
**Sent:** 17 July 2014 14:54  
**To:** Development Plans  
**Subject:** Consultation on the Local Plan part 1: Core Strategy - Proposed Submission

To whoever it may concern

Please accept this email as a formal representation to the current consultation on the Blackpool Local Plan Part 1: Core Strategy - proposed submission document.

Having considered the consultation document, Ribble Valley Borough Council do not wish to make any specific representations on the consultation document.

Many thanks for consulting us.

Kind regards

**Diane Neville**  
**Senior Planning Officer**

BSc (Hons), MA, MA, MRTPI

Forward Planning, Ribble Valley Borough Council

Council Offices, Church Walk, Clitheroe, BB7 2RA

Direct Dial: 01200 414491

**Normal work pattern: Wednesday afternoon, Thursday & Friday**

In my absence please contact my job share partner [Joanne.Macholc@ribblevalley.gov.uk](mailto:Joanne.Macholc@ribblevalley.gov.uk)

**Best in the country for customer satisfaction – 94% of Ribble Valley residents are satisfied with life in the borough (Place Survey 2009)**

<!--[if !supportEmptyParas]--> <!--[endif]-->

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## Comments on the Blackpool Local Plan: Proposed Submission Core Strategy

Lancashire County Archaeology Service, 7<sup>th</sup> August 2014

The County Archaeology Service does not wish to raise any objections to the proposed submission version of the Core Strategy, but would suggest that a glossary of terms would be helpful. With respect to *Policy CS8: Heritage* the following entries are suggested:

**Archaeological Interest:** There will be archaeological interest in a heritage asset if it holds, or potentially may hold, evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them. The evidence may be contained in the fabric of a built structure such as blocked openings or timbers and stonework capable of dating, or it may be held in surface earthworks or buried layers such as ditches, debris from construction or rubbish pits.

**Conservation Area:** an area of special architectural interest, the character or appearance of which it is desirable to preserve or enhance. Conservation areas are designated by the local planning authority and will often be accompanied by a conservation area appraisal, setting out the main features and points of interest.

**Designated Heritage Asset:** A heritage asset which is a World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation. Designated heritage assets enjoy more protection under the planning process than non-designated sites. At present there are no World Heritage Sites, Scheduled Monuments, Protected Wrecks or Registered Battlefields in Blackpool.

**Heritage asset:** A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Heritage assets include designated heritage assets, assets identified by the local planning authority (including local listing) and sites noted on the county's Historic Environment Record, a list of known sites in Lancashire which is currently maintained by Lancashire County Council.

**Historic environment:** All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

**Listed Buildings:** a listed building is a building that has been placed on the Statutory List of Buildings of Special Architectural or Historic Interest. It is a widely used status, applied to around half a million buildings in the UK and offers protection against unnecessary and/or damaging development by means of a system of Listed Building Consent in addition to the normal planning consent process. The statutory body maintaining the list in England is English Heritage. Grade I buildings are of exceptional interest, sometimes considered to be internationally important. Grade II\* buildings are particularly important buildings of more than

special interest. Grade II buildings are nationally important and of special interest; 92% of all listed buildings are in this class and it is the most likely grade of listing for a home owner. Listing covers all part of the building both interior and exterior and often also applies to related features such as boundary walls and ancillary structures within the property boundary.

**Local List:** Buildings, sites and landscapes on a Local List are offered a degree of protection against unnecessary and/or damaging development owing to their local interest. They will not enjoy the full protection of those buildings of national interest which are likely to feature on the Statutory Register of Listed Buildings. A local list is normally compiled by a local authority in consultation with residents.

**Registered Parks and Gardens:** the English Heritage 'Register of Historic Parks and Gardens of special historic interest in England' established in 1983 currently identifies over 1,600 sites assessed to be of national importance. A park or garden is a deliberately designed landscape, but can be the result of more than one stage of construction and development and subject to significant changes in management during its life. Like Listed Buildings, Historic Parks and Gardens are categorized as Grade I, Grade II\* or Grade II by assessing their importance and interest.

**Setting of a heritage asset:** The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset; they may also affect the ability to appreciate that significance or may be neutral.

**Significance:** The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. Not all parts of a heritage asset may have the same significance and there may be parts which are of low significance or indeed which detract from the overall significance of the asset.

Peter Iles

Specialist Advisory Services, Lancashire County Council, Development Management, PO Box 100, County Hall, Preston, PR1 0LD

t. 01772 531550, e. [peter.iles@lancashire.gov.uk](mailto:peter.iles@lancashire.gov.uk)



FAO: E. Jane Saleh

Planning Department  
Blackpool Council  
PO Box 17  
Corporation Street  
Blackpool Council FY1 1LZ

Our Ref: P/6 & P/15

Your Ref:

Please Ask For: Mark Evans

Telephone: 01253 658460

Email: [mark.evans@fylde.gov.uk](mailto:mark.evans@fylde.gov.uk)

Date: 12 December 2014

Dear Jane,

## **RESPONSE TO BLACKPOOL LOCAL PLAN PART 1: CORE STRATEGY - PROPOSED SUBMISSION (JUNE 2014)**

The opportunity to comment upon Blackpool Core Strategy's Proposed Submission and supporting documents is welcomed. It is not considered appropriate nor necessary to raise an objection to the Blackpool Core Strategy – Proposed Submission. This response includes points of clarification and correction of factual inaccuracies which may result in minor amendments to improve the clarity of the documents without altering their substance.

### **Proposed Submission**

- Para 5.52 relies on the 2011 Retail Study which identifies 16,390 sq.m (gross) comparison floor space for Blackpool town centre 2010 – 2021. You should be aware that the 2013 update of the retail Study identifies -2,166 sq.m (net) Blackpool town centre 2013-2021.
- Policy CS6 sets out the approach to Green Belt areas. Protection of their openness and locally distinctive character is supported. Whilst it is noted that there is no planned strategic review of Green Belt boundary during the plan period it is also noted that page 17, para 2.37, bullet point 7 states that "Any change will need to be managed in a positive way..." The importance of the Green Belt on lands between Blackpool and St Annes is considered to be of strategic importance to both Blackpool and Fylde. As stated in NPPF, any change to the Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.
- **Fylde Borough Local Plan to 2030**

Fylde Borough Council's Local Plan Steering Group (LPSG) has considered the comments raised as a result of its Preferred Option consultation. As a result of that deliberation the Portfolio Holder (PH) is minded to reconsider the distribution of strategic housing and employment sites throughout the

borough. This would result in a re-examination of the strategic development sites at Warton and Kirkham and the examination of potential additional development sites in the vicinity of the M55 junction 4/Whitehills. New data was published by the Office for National Statistics earlier this month which may have implications for the Strategic Housing Market Assessment and the potential number of houses to be delivered during the plan period. This will require further appraisal which will need to be considered by the LPSG/PH. The PH has also asked officers to review the Employment Land Study in the light of additional representations received by the Council. Accordingly it will be necessary to carry out a reappraisal of these development options along with other factors and to carry out further consultation in respect of them.

Presently the position which is recorded in the Preferred Option consultation statement is one where Fylde Council agrees to refer to the sub-regional significance of Whyndyke Farm as a strategic site in the justification to policy. Furthermore, Fylde Council has resolved to bring forward the phasing of housing development at Whyndyke Farm from a projected commencement date of 2020 to a start date of 2015. This will result in Whyndyke Farm being fully delivered and completed within the plan period.

The reason for setting out the position above is to provide a context to the specific comments which follow in respect of 'Enabling South Blackpool Growth and Enhancement'.

- **Enabling South Blackpool Growth and Enhancement**

Key to the delivery of this area's growth and the implementation of policies CS24 and CS25 is the agreement which has been achieved via the Duty to Co-operate: Memorandum of Understanding (MoU) between the Fylde Coast Authorities and Lancashire County Council (2013). It is acknowledged that it includes the following key issues:

"To work together to agree the strategic priorities for land around junction 4 of the M55 – Fylde/Blackpool boundary with the aim of attracting major new economic development to help strengthen the Fylde Coast economy; and Promote a strong and distinctive sustainable urban extension closely integrated with the surrounding areas on land on the Fylde/Blackpool boundary around Junction 4 of the M55;"

Para 8.3 states "neighbouring authorities are co-operating over future development of lands..." and para 8.7 refers to "...new development on wider lands in neighbouring Fylde." It is suggested that the MoU and the Blackpool Core Strategy's Proposed Submission place a different emphasis upon what has been agreed to date. Agreeing strategic priorities, and promoting a sustainable urban extension is different to Blackpool Council assuming that there will be strategic sites promoted and for development on the Fylde-Blackpool Periphery.

Ultimately a final decision is yet to be made by Fylde Council on the location and quantum of development lands which are to be promoted on lands in Fylde, including on the Fylde-Blackpool Periphery.

To avoid confusion the document should be clear when it is referring to lands close to junction 4 of the M55, whether it is referring to land located within the Blackpool boundary or land located within Fylde Borough. If, as appears to be the case Blackpool's Core Strategy is dependent upon the allocation and development of lands in Fylde, then that too should be made clear.

- Figure 18: South Blackpool Growth and Enhancement - It should be noted that area '5 Whitehills (Fylde)' appears to illustrate the areas of employment and industry allocated by the saved policies EMP1 and EMP2 of the adopted Fylde Borough Local Plan 1996 - 2006, Alterations Review, (2005). You will be aware that Fylde Council's Preferred Option consultation included proposed allocations for employment land on the Fylde/Blackpool boundary. As set out previously Fylde Council is reappraising its development options here and elsewhere.
- Para 8.16, states "The Fylde Local Plan identifies around 14ha of additional employment land close to Junction 4 of the M55..." It is assumed that this referring to Fylde Council's Preferred Options document. This is an emerging plan which can only be afforded some material weight as Fylde Council is reappraising its development options. It includes references to providing for Blackpool's shortfall in employment land on lands in Fylde at 5.16, 9.10 & 9.14. These reference are more general in nature (land in, or land within the Fylde boundary). They do not specify precisely where this provision is to be made, nor does it commit to it being close to M55 J4.

## **Sustainability Appraisal**

- There are references throughout to Fylde Council Core Strategy. Previously Fylde Council was producing a Core Strategy however now it is referred to as a Local Plan and should be referenced accordingly.
- Page 36 *Strategic objective 17 states "Support economic growth at the Blackpool Airport Corridor and on lands close to Junction 4 of the M55."*  
As stated above a final decision is yet to be made by Fylde Council whether to promote development in this area on lands in Fylde. To avoid confusion the document should be clear when it is referring to lands close to junction 4 of the M55, whether it is referring to land located within the Blackpool boundary or land located within Fylde Borough.
- Page 42, para 2 states "The Spatial Strategy indicates that, in the future, there may be scope to develop a sustainable extension to the Blackpool urban area on land along the Blackpool/Fylde boundary."  
A Sustainable extension along the Blackpool/ Fylde boundary would be dependent upon the agreement of Fylde Council.
- Page 53, last para states "Policy CS25 also promotes the sustainable development of wider land to support sub-regional growth."  
This is a particularly bold a statement, which if read correctly is promoting development of wider land which presumably includes land in Fylde.

- Page 54, para 3 refers to “Policy CS25 promotes major redevelopment and enhancement of land along the Airport corridor...”  
This commentary appears to relate to policy CS24.
- 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?

### **Infrastructure Delivery Plan**

- It is noted that para 2.2.2 recognises the sub-regional level shared infrastructure issues as including:
  - “road capacity and infrastructure including the A585 and evaluating the M55 to Norcross Link (Blue Route);
  - improving rail accessibility to key national and regional centres and strengthening the role of the South Fylde rail line; and
  - consideration of surface water drainage issues along the urban coastal belt;”

In respect of the A585 there appears to be no further reference to the proposed link road elsewhere in the IDP. Notwithstanding the fact that the line of this route lies outside the Blackpool Plan area its implementation will directly impact upon the movement of vehicles in and around Blackpool. It may therefore be appropriate to refer to the Blue Route in more detail under the Transport section.

In respect of the South Fylde rail line it is noted that para 3.1.19 of the IDP states that “To increase service frequency a passing loop would be required.” No further information is provided about this elsewhere in the IDP. Also absent is any reference to a possible Tram/Train service on the South Fylde Line. Paras 5.69 and 5.71 of the Proposed Submission Core Strategy, include details of both tram/train technology and providing double-track or passing-loops. It is suggested that the IDP should provide similar details.

- There are references throughout to Fylde Council Core Strategy, previously Fylde was producing a Core Strategy however now it is referred to as a Local Plan and should be referenced accordingly.
- Para 2.3.1 states “Supporting growth and enhancement in South Blackpool to meet future housing and employment needs for Blackpool and the Fylde Coast.” and 2.3.2 states “Pursuing South Blackpool Growth to meet housing and economic needs as part of a sustainable urban extension on the edge of Blackpool.”

Please refer to previous comments on the proposed Submission Core Strategy relating to Fylde lands on the Blackpool/Fylde boundary and the need for Fylde Council to reappraise its development options.

- Para 3.1.23 states that “Blackpool and Fylde Councils are working with the owners of the Airport to identify opportunities for appropriate future growth and development to support and strengthen the function of the airport, with a Masterplan currently being prepared which will include the development of the 25 acre site on the north side of the airport. The sustainable development of this site will be essential to support the long term future of the airport”

This suggests that Blackpool and Fylde Councils are committed to supporting development on land in Blackpool Airport. Fylde Council has not committed to this at the present time. Also the statement that the sustainable development of this site is essential to support the long term future of the Airport is considered to be too strong a statement to give and would seem to pre-determine proposed development there. It is suggested that the wording in para 8.13 of the Blackpool Core Strategy’s Proposed Submission is more appropriate.

- Para 3.10.1 states “Concerns were raised regarding the wider development of lands around Junction 4 of the M55, the majority of which is located within Fylde Borough.”

Please refer to previous comments on the proposed Submission Core Strategy relating to Fylde lands on the Blackpool/Fylde boundary and the need for Fylde Council to reappraise its development options.

- Para 4.6.3 states “The Whyndyke Farm allocation forms part of a wider development in Fylde of around 1500 dwellings in total,” it is suggested that this should be clarified that this could change as no planning application has been approved at Whyndyke Farm and numbers of dwellings could change.
- Para 4.6.35 & Figure 20: Traffic assessment Study Area - This map should be caveated to say that this technical study was undertaken based upon hypothetical development locations. Particularly in respect of the sites in Fylde (Whyndyke Farm and Peel Hill) and as stated above, a final decision is yet to be made by Fylde Council whether to promote development in this area on lands in Fylde.

Should you wish to discuss any of the matters raised in this response then please do not hesitate to contact me. I hope that you find these comments helpful. Fylde Council looks forward to working closely with Blackpool Council under the Duty to Co-operate and progressing the delivery of our respective development plans and determination of cross-boundary strategic planning applications.

Yours sincerely



**Mark Evans**  
Head of Planning & Regeneration

# Proposed Submission Core Strategy Representation Form

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

**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)
<b>Title</b>	Ms	
<b>First Name</b>	Rose	
<b>Last Name</b>	Freeman	
<b>Job Title</b>	Planning Policy Officer	
<b>Organisation</b>	The Theatres Trust	
<b>Address</b>	22 Charing Cross Road	
	London	
<b>Postcode</b>	WC2H 0QL	
<b>Telephone</b>	020 7836 8591	
<b>Email</b>	planning@theatrestrust.org.uk	

### 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)

**For official use only**

Ref: CSPA /

## PART B: Core Strategy Representation

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

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

<b>Name:</b>	Rose Freeman
<b>Organisation</b>	The Theatres Trust

<b>1. To which part of the Proposed Submission Core Strategy does this representation relate?</b>	
<b>Policy Reference</b>	CS17
<b>Section/Paragraph Number</b>	
<b>Map Reference</b>	
<b>Appendix Number</b>	

<b>2. In respect of this part of the Plan, do you consider the Proposed Submission Core Strategy is:</b>	
(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 checked="" 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.

<b>3. In what way do you consider this part of the Core Strategy is not legally compliant? Please be as precise as possible.</b>
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 checked="" type="checkbox"/> |
| (iv) Not consistent with national policy | <input checked="" 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.

We do not find the Core Strategy sound as it does not reflect the guidance in items 70 and 125 of the National Planning Policy Framework for the protection of existing community and cultural facilities.

**Policy CS17: Blackpool Town Centre**

We are pleased that the document contains key objectives (Goal 3, page 24) that promote the arts and cultural offer of Blackpool and that it refers to key cultural facilities such as the Grand Theatre. However, we are concerned that the Core Strategy focuses on the provision of new community and cultural facilities and the wording does not provide criteria for the protection for existing cultural facilities to reflect item 70 in the National Planning Policy Framework. The NPPF states that to deliver the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should plan for the use of shared space and *guard against unnecessary loss of valued facilities*. Also to ensure that *established facilities and services are retained* and able to develop for the benefit of the community.

**Policy CS18: Winter Gardens**

Policy CS18: Winter Gardens is also of concern. The policy promotes a range of new uses, such as hotels and casinos. While it is acknowledged that there are other compatible uses, the policy fails to protect its existing theatre (The Opera House) and cultural uses, which you say in para.7.12 'is the world's most complete Victorian all weather complex of theatres and conference facilities'.

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.

The Vision and para.7.4 both mention the leisure, cultural and social experience in the evening with reference to the town centre. **Policy CS17** does not mention the evening economy for which Blackpool is renowned. Item c. of the policy must include the protection and enhancement of key entertainment and heritage assets especially those contributing to a vibrant evening economy.

Blackpool is first and foremost a holiday destination. Item 1. of Policy CS17 should reflect this – the shopping destination is of secondary importance. Item a. should be strengthening the tourist and visitor attractions by protecting and enhancing existing and the provision of new. Item b. should then be to strengthen the retail offer. Blackpool is not known for its shops – it is a national destination for the Lights, the Tower, the trams, the seafront, and many evening entertainment venues that are unique to Blackpool.

**Policy CS18** should make reference to the maintenance of existing entertainment venues within the complex and then provide criteria for new - the 'default' position should be to retain and improve, this being the most sustainable option. This would reflect item 70 of the NPPF.

Continue on a separate sheet/expand box if necessary

## PART D: Examination in Public

11. Do you wish to express an interest to participate in the Examination?	
Yes, I wish to participate at the oral Examination	<input type="checkbox"/>
No, I do not wish to participate at the oral Examination	<input checked="" type="checkbox"/>
<p>If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary. Only where a modification is sought to the Core Strategy is there a right for the representation to be heard at an Examination hearing session. Please note that the Inspector, not the Council, will decide who should be invited to speak at the Hearing sessions and also which topics are to be covered at them.</p>	
<p>Continue on a separate sheet/expand box if necessary</p>	

Declaration	
<p>I understand that all representations submitted will be made available for public inspection and will be identifiable to my name and organisation (if applicable).</p>	
Signature: Rose Freeman	Date: 14 August 2014

**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	mr	
First Name	ian	
Last Name	stanley	
Job Title	hotelier	
Organisation	chadsley hotel	
Address	12 palatine road	
	blackpool	
	lancashire	
Postcode	fy1 4bt	
Telephone	01253 626787	
Email	chadsleyinfo@yahoo.co.uk	

**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)

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Ref: CSPA /

## PART B: Core Strategy Representation

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

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

<b>Name:</b>	ian stanley
<b>Organisation</b>	chadsley hotel

<b>1. To which part of the Proposed Submission Core Strategy does this representation relate?</b>	
<b>Policy Reference</b>	cs23
<b>Section/Paragraph Number</b>	7.42
<b>Map Reference</b>	84
<b>Appendix Number</b>	102

<b>2. In respect of this part of the Plan, do you consider the Proposed Submission Core Strategy is:</b>	
(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 checked="" 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.

<b>3. In what way do you consider this part of the Core Strategy is not legally compliant? Please be as precise as possible.</b>
<p style="text-align: right;">Continue on a separate sheet/expand box if necessary</p>

**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.

we do not consider this to be compliant due to allowing others in same street / holiday accommodation area to be out of the holiday zone. caused by splitting street in half, this street palatine road fy1 4bt is a mixed use street already with existing hmo's private flats, student lets, dereliction, residential accommodation and hotels. one side of the street is out the holiday zone which does not in anyway help the other side of the street to be seen as holiday area. i would also like to add the Talbot ward side of said same street ( palatine road) would also like to be considered for removal from holiday zone to which there is a petition in progress.

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 checked="" 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

## PART D: Examination in Public

<b>11. Do you wish to express an interest to participate in the Examination?</b>	
Yes, I wish to participate at the oral Examination	<input checked="" type="checkbox"/>
No, I do not wish to participate at the oral Examination	<input checked="" type="checkbox"/>
<p>If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary. Only where a modification is sought to the Core Strategy is there a right for the representation to be heard at an Examination hearing session. Please note that the Inspector, not the Council, will decide who should be invited to speak at the Hearing sessions and also which topics are to be covered at them.</p>	
<p>Continue on a separate sheet/expand box if necessary</p>	

<b>Declaration</b>	
I understand that all representations submitted will be made available for public inspection and will be identifiable to my name and organisation (if applicable).	
Signature: mr ian stanley	Date: 31/07/2014

**PART A: Contact Information**

For official use only

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

Ref: /

	Person/Organisation	Agent (if applicable)
<b>Title</b>	mr	
<b>First Name</b>	colin	
<b>Last Name</b>	johnson	
<b>Job Title</b>	hotelier	
<b>Organisation</b>	memphis hotel	
<b>Address</b>	14 palatine road	
	blackpool	
<b>Postcode</b>	FY14BT	
<b>Telephone</b>	01253624178	
<b>Email</b>	memphishotel@yahoo,co,uk	

**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**

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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)

For official use only

Ref: CSPA /

## PART B: Core Strategy Representation

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

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

<b>Name:</b>	Colin Johnson
<b>Organisation</b>	Memphis Hotel

<b>1. To which part of the Proposed Submission Core Strategy does this representation relate?</b>	
<b>Policy Reference</b>	cs23
<b>Section/Paragraph Number</b>	7.42
<b>Map Reference</b>	84
<b>Appendix Number</b>	102

<b>2. In respect of this part of the Plan, do you consider the Proposed Submission Core Strategy is:</b>	
(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 checked="" type="checkbox"/>
(c) Sound?	Yes <input type="checkbox"/> No <input type="checkbox"/>

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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.

<b>3. In what way do you consider this part of the Core Strategy is not legally compliant? Please be as precise as possible.</b>
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.

we do not consider this to be compliant due to parts of the street are hmos, holiday flats, guest houses, student accommodation, residential. and derelict buildings, also part of the street is in the zone and part not in the zone, due to the aforementioned we ask that the council either remove us from the holiday zone or allow the holiday accommodation that is left in palatine road the ability to turn there business into there own private homes. also be able to sell their property with planning permission to turn it into a home

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 checked="" 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

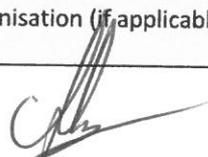
**Please ensure you sign the declaration at the end of the Form**

**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

## PART D: Examination in Public

<b>11. Do you wish to express an interest to participate in the Examination?</b>	
Yes, I wish to participate at the oral Examination	<input checked="" type="checkbox"/>
No, I do not wish to participate at the oral Examination	<input type="checkbox"/>
<p>If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary. Only where a modification is sought to the Core Strategy is there a right for the representation to be heard at an Examination hearing session. Please note that the Inspector, not the Council, will decide who should be invited to speak at the Hearing sessions and also which topics are to be covered at them.</p>	
<p>Continue on a separate sheet/expand box if necessary</p>	

<b>Declaration</b>	
I understand that all representations submitted will be made available for public inspection and will be identifiable to my name and organisation (if applicable).	
Signature: COLIN JOHNSON 	Date: 8/8/14



MALCOLM Hicks,  
4, PRINCES ROAD,  
LOWESTOFT,  
SUFFOLK,  
NR32 2NS.  
8/7/14

DEAR MADAM,

THANK YOU VERY MUCH FOR YOUR  
LETTER OF THE 4/7/14 REGARDING THE BLACKPOOL  
LOCAL PLAN, PART 1, CORE STRATEGY - PROPOSED  
SUBMISSION (JUNE 2014). THE ONLY QUESTION THAT I  
HAVE WITH REGARD TO THE BLACKPOOL LOCAL PLAN IS  
ABOUT PUBLIC TRANSPORT IN BLACKPOOL, WHAT ARE  
THE PLANS OR PROPOSALS FOR PUBLIC TRANSPORT,  
THIS IS REALLY THE ONLY QUESTION THAT I CAN  
THINK OF FOR NOW, SO I WILL BE GRATEFUL FOR ANY  
INFORMATION ABOUT PUBLIC TRANSPORT AND I HOPE TO  
HEAR FROM YOU SOON ON THIS MATTER. SINCERELY FOR  
NOW.

YOURS FAITHFULLY  
Malcolm Hicks



taking pride...

Ms. J. Saleh.  
Head of Development Plans and Projects,  
Blackpool Council,  
PO Box 17,  
Corporation Street,  
Blackpool  
FY1 1LZ

**Please ask for:**  
**Telephone No.**  
**Email:**  
**Our Ref:**  
**Date:**

David Thow  
01253 887287  
[david.thow@wyre.gov.uk](mailto:david.thow@wyre.gov.uk)

21 August 2014

Dear Ms. Saleh,

### **Proposed Submission Blackpool Local Plan Part 1**

Thank you for consulting Wyre Council on the Blackpool Local Plan. Wyre Council previously commented on the emerging Local Plan, including the revised draft in 2012.

Wyre and Blackpool form part of the Fylde Coast sub-region. As such the two Boroughs have worked together on a wide range of planning, housing and economic matters over the years. The two Councils, along with Fylde Council and Lancashire County Council, have endorsed the Fylde Coast Memorandum of Understanding (MoU). The MoU sets out the strategic planning matters that the Councils will work on together to address cross-boundary planning issues. I can confirm that the two Councils have engaged in an on-going, constructive and co-operative manner in preparing each authority's Local Plan. Short comments regarding Blackpool's draft Statement of Compliance with the Duty to Co-operate document are contained in separate correspondence.

Wyre Council makes the following observations about the final draft Local Plan which includes points of clarification and correct that may result in minor amendments to the document in order to improve clarity.

#### **Policy CS2: Housing Provision**

The principal housing policy sets out details about the number of new dwellings that will be provided in Blackpool over the plan period. This is based on the findings of the Fylde Coast Strategic Housing Market Assessment (SHMA). The provision of 280 new dwellings per year falls within the Objectively Assessed Needs range identified by the 2014 SHMA. The policy states that "around 4,200" dwellings will be provided. The supporting text specifically identifies the phasing arrangements for the periods 2012-2017, 2017-2022 and 2002-2027. To ensure the policy wording and supporting text are fully aligned it may be advisable to delete the word "around" from Policy CS2 and make clear that the housing requirement is a minimum.

#### **Policy CS4: Retail and Other Town Centre Uses**

The principal retail and town centre uses policy sets out details for promoting the vitality and viability of the Borough's centres. The supporting text makes reference to the findings of the Fylde Coast Retail Study 2011, including details of the comparison goods floorspace capacity figures. However, now that the 2013 Update to the Fylde Coast Retail Study has been completed and

Civic Centre, Breck Road, Poulton – le – Fylde, Lancashire FY6 7PU

Tel: (01253) 891000

Fax: (01253) 899000

Textphone: (01253) 887636

[www.wyre.gov.uk](http://www.wyre.gov.uk)

published (on Fylde Council's website) the capacity figures from that update document should be incorporated into the Local Plan in place of the 2011 information.

### **Policy CS6: Green Infrastructure**

The application of national policy regarding Green Belt areas and the confirmation that there is no planned strategic review of existing Green Belt boundaries during the plan period is welcomed, particularly given the small but strategically important nature of Green Belt shared by Blackpool and Wyre.

### **Policy CS16: Traveller Sites**

It is noted that the Local Plan Part 2 will set out new permanent and transit pitch and plot requirements. Explanatory text at paragraph 6.55 should be amended as this includes subjectivity (for example the word "better" in the sentence "aiming to ensure a better distribution of future requirements across each sub-region) and does not accurately reflect the Lancashire sub-regional GTAA 2007 which included pitch requirements by local authority for 2006-16.

### **Policy CS24: South Blackpool Employment Growth**

This policy identifies both Blackpool Airport Corridor and Lands close to Junction 4 of the M55 as sustainable locations to support sub-regional economic growth. As these locations are to serve the Fylde Coast sub-region it will be important that the policy (and its implementation) properly reflects a range of sub-regional matters that may affect Wyre. This includes transport and highways matters and ensuring that any proposals do not undermine the established Hillhouse International Business Park that is already acknowledged as a strategic economic growth priority for the Fylde Coast and Lancashire County economies.

The Statement of Compliance with the Duty to Co-operate may have to be updated to reflect the above observations prior to its submission to the Planning Inspectorate.

Please will you inform Wyre Council about all future stages of the Local Plan.

Yours sincerely

A handwritten signature in black ink, appearing to read "David Thow", enclosed in a thin black rectangular border.

**David Thow**  
**Head of Planning Services**

Blackpool Council Proposed Submission Core Strategy  
Representation Form – July/August 2014

**PART A: Contact Information**

<b>For official use only</b>
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	Forward Planning Team	
Organisation	South Ribble Bor Council	
Address	Civic Centre	
	West Paddock	
	Leyland	
Postcode	PR26 7LF	
Telephone	01772 625451	
Email	forwardplanning@ southribble.gov.uk	

<b>Notification of subsequent stages of the Core Strategy</b>	
Please specify if you wish to be notified of any of the following:	
Submission of the Core Strategy for independent examination	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Publication of the recommendations of the person appointed to carry out an independent examination of the Core Strategy	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Adoption of the Core Strategy	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

<p><b>How we will use your details</b></p> <p>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.</p> <p>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 <a href="mailto:development.plans@blackpool.gov.uk">development.plans@blackpool.gov.uk</a></p>
---

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:

Name:	Forward Planning
Organisation	South Ribble Borough Council

1. To which part of the Proposed Submission Core Strategy does this representation relate?	
Policy Reference	ALL
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 checked="" type="checkbox"/> No <input type="checkbox"/>
(b) Compliant with the Duty to Co-operate?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
(c) Sound?	Yes <input checked="" 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?**

We consider the document to be legally compliant and sound.

Continue on a separate sheet/expand box if necessary



**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)
<b>Title</b>	mr	
<b>First Name</b>	richard	
<b>Last Name</b>	panek	
<b>Job Title</b>		
<b>Organisation</b>	58 palatine road	
<b>Address</b>	58 palatine road	
	blackpool	
<b>Postcode</b>	fy1 4by	
<b>Telephone</b>	01253 294683	
<b>Email</b>	rickpanek@live.co.uk	

**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

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**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.**

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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.

I do not consider this to be compliant due to allowing others in same street /holiday area to be able to come out of holiday accommodation. with this being allowed to happen causes the holiday zone to be " like a snake pattern" some in and some taken out. Palatine road is now a mix of accommodation use, therefore not all are hotels. some accommodation has become empty and starting to run down. I believe a change is needed to improve this area, please consider a change in this matter in order to gain future improvements in residential use.

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 checked="" type="checkbox"/> |
| (iii) Not effective                      | <input type="checkbox"/>            |
| (iv) Not consistent with national policy | <input type="checkbox"/>            |

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**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

## PART D: Examination in Public

<b>11. Do you wish to express an interest to participate in the Examination?</b>	
Yes, I wish to participate at the oral Examination	<input type="checkbox"/>
No, I do not wish to participate at the oral Examination	<input checked="" type="checkbox"/>
<p>If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary. Only where a modification is sought to the Core Strategy is there a right for the representation to be heard at an Examination hearing session. Please note that the Inspector, not the Council, will decide who should be invited to speak at the Hearing sessions and also which topics are to be covered at them.</p>	
<p>Continue on a separate sheet/expand box if necessary</p>	

<b>Declaration</b>	
I understand that all representations submitted will be made available for public inspection and will be identifiable to my name and organisation (if applicable).	
Signature: richard panek	Date: 31/07/2014

# WESTBY-WITH-PLUMPTIONS PARISH COUNCIL

Mrs. J. Kirkham (Clerk)

Telephone – 01253 – 836234

E mail: [weswegpc@btinternet.com](mailto:weswegpc@btinternet.com)

FAO: Jane Saleh

Pendle View  
Fleetwood Road  
ESPRICK  
Preston  
PR4 3HJ

22<sup>nd</sup> August 2014

Planning Department  
Blackpool Council  
PO Box 17  
Corporation Street  
BLACKPOOL  
FY1 1LZ

E mail to:- [consult@objective.co.uk](mailto:consult@objective.co.uk)  
[development.plans@blackpool.gov.uk](mailto:development.plans@blackpool.gov.uk)

Dear Sir / Madam

## Response to Blackpool Local Plan Part 1: Core Strategy – Proposed submission (June 2014)

With regards to the Blackpool Local plan, the Westby with Plumptions Parish Council would like the following areas to be considered by the relevant planning departments.

It was discussed at the 20th August 2014 Special Parish Council meeting that Blackpool is a unitary authority. With this in mind, the Parish Council feels that there should be no requirement for the proposed planning to infringe within the Westby-with-Plumptions' parish area.

A further point raised was the suggestion that the planning should rather consider the development of the many existing 'brown sites'. This would not only enhance the existing Blackpool area but would also negate the need to encroach into other parishes. For example, several smaller hotels are vacant – can these units not be developed for housing?

Should the proposed development be realised, the environmental effects on the Westby-with-Plumptions Parish must be considered. The water-system is already running beyond capacity and there are regular flooding issues. Additionally, the highways are to be considered – the extra traffic would certainly affect the community which is primarily rural.

Should the development be approved, the Parish Council would like to enquire if there has been provision made for social housing?

We would also like to enquire whether the proposed development is also planned for the Wyre district beyond the Blackpool border. For example, it was suggested that the large tract of vacant land adjacent to Farmer Parrs, Thornton, would certainly benefit from development and also enhance the area.

In conclusion, the Westby with Plumptions Parish Council do not support any further proposed development within the Parish especially on the Whyndyke area.

Yours faithfully

*Joan Kirkham*

Clerk



## Comment

<b>Consultee</b>	Mrs Rooney (205684)
<b>Email Address</b>	therooneys12@tiscali.co.uk
<b>Address</b>	12 Hardwicke Road Narborough Leics LE19 3LW
<b>Event Name</b>	Core Strategy Proposed Submission
<b>Comment by</b>	Mrs Rooney
<b>Comment ID</b>	CSPS1
<b>Response Date</b>	27/08/14 19:58
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

### 1. To which part of the Proposed Submission Core Strategy does this relate?

**Policy Reference(s):** CS26: Marton Moss

**Section/Paragraph Number:** 8.24

**Map Reference:** 04

### 2. In respect of this part of the Plan, do you consider the Proposed Submission Core Strategy is:

**(a) Legally Compliant** Yes

**(b) Compliant with the Duty to Co-operate?** Yes

**(c) Sound** No

**6. In what respect do you consider this part of the Core Strategy is unsound?** . (ii) Not justified

**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, please complete a separate Part B sheet for each one.**

Some of the policies about Marton Moss are too restrictive and focus too much on the needs for agricultural purposes when there are large areas of Marton Moss which have not been used for agricultural purposes for decades. Some of the land lies fallow and overgrown and does not look attractive and could be enhanced with sustainable development, particularly if the land is on a highway frontage where development already exists. Brandon Lewis, the Minister for Housing and Planning, purports that not all rural land is 'sacrosanct' and that some house building can transform disused and neglected land into more desirable locations. Waiting for the introduction of the neighbourhood planning process is too procrastinated, and will not facilitate the need for swift action to redress the desperate housing shortage in this country. Small scale developments on infill plots will help to maintain the individual character of Marton Moss, rather than large developments constructed by building firms who tend to cram the houses together, failing to reflect the character of Marton Moss.

**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.**

Relax the rules regarding the building of new dwellings on Marton Moss and allow sustainable development in areas where the land is disused and has not been used for agricultural purposes in order to enhance the area without waiting for the neighbourhood planning process, If the neglected land is in the middle of other existing houses on the highway front, this will improve the appearance, reduce the risk of crime or misuse of the land, without spoiling the overall character of Marton Moss.

Paragraph 8.24 could be re-worded and the following sentence could be inserted:

*However, prior to the neighbourhood planning process, where there is fallow and disused land on a highway frontage with existing dwellings, development will be permitted in order to enhance the landscape.*

**Do you have any other comments** . No

**Do you have any comments to make on the Sustainability Appraisal?** . No

**10. Do you wish to express an interest to participate in the Examination?** . No, I do not wish to participate at the Oral Examination

**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

**Publication of the recommendations of the person appointed to** . Yes

**carry out an independent examination of the Core Strategy** . Yes

**Adoption of the Core Strategy** . Yes

**Declaration**

**Name**

KATE ROONEY

**Date (dd/mm/yyyy)**

27/08/2014

## PART A: Contact Information

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

For official use only

Ref: /

	Person/Organisation	Agent (if applicable)
Title		M/R
First Name		CHRIS
Last Name		WGETMAN
Job Title		INDEPENDENT PLANNING CONSULTANT
Organisation		CW PLANNING SOLUTIONS
Address		1 REEVESWOOD
		ECCLESTON
		CHORLEY
		LANCASHIRE
Postcode		PR 7 5RS
Telephone		01257 453617
Email		Chrisw@e@hotmail.co UK

### 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)

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Ref: CSPA /

## PART B: Core Strategy Representation

Please use a separate form for each representation

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

Name:	CHRIS WRETMAN
Organisation	CW PLANNING SOLUTIONS

<b>1. To which part of the Proposed Submission Core Strategy does this representation relate?</b>	
Policy Reference	POLICY CS 26 MARTON MOSS
Section/Paragraph Number	1 + 2
Map Reference	
Appendix Number	

<b>2. In respect of this part of the Plan, do you consider the Proposed Submission Core Strategy is:</b>	
(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 checked="" 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.

<b>3. In what way do you consider this part of the Core Strategy is not legally compliant? Please be as precise as possible.</b>
<p style="text-align: right;">Continue on a separate sheet/expand box if necessary</p>

**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 checked="" type="checkbox"/> |
| (iii) Not effective                      | <input checked="" type="checkbox"/> |
| (iv) Not consistent with national policy | <input checked="" 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.

CORE STRATEGY POLICY CS 26 IS NOT IN ACCORDANCE WITH THE NPPF. THE PROPOSED POLICY IS AT ODDS WITH PARAGRAPH 55 OF THE NPPF WHICH ALLOWS THE RE-USE OF REDUNDANT OR DISUSED BUILDINGS AND LEAD TO AN ENHANCEMENT OF THEIR IMMEDIATE SETTING.

IN ADDITION THE REQUIREMENT FOR A COMPREHENSIVE NEIGHBOURHOOD PLAN PRIOR TO ANY LARGE SCALE HOUSING DEVELOPMENT PREVENTS SMALL SCALE INDIVIDUAL DEVELOPMENT

Continue on a separate sheet/expand box if necessary

WHICH UNDERMINES THE INDIVIDUALITY CHARACTERISTIC OF THE AREA.

**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.

CS 26 SHOULD INCLUDE THE CONTENTS OF PARAGRAPH 55 OF THE NPPF IN ITS ENTIRETY AND NOT PICK AND CHOOSE WHICH BULLETPPOINTS TO INCLUDE

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

## PART D: Examination in Public

<b>11. Do you wish to express an interest to participate in the Examination?</b>	
Yes, I wish to participate at the oral Examination	<input checked="" type="checkbox"/>
No, I do not wish to participate at the oral Examination	<input type="checkbox"/>
If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary. Only where a modification is sought to the Core Strategy is there a right for the representation to be heard at an Examination hearing session. Please note that the Inspector, not the Council, will decide who should be invited to speak at the Hearing sessions and also which topics are to be covered at them.	
THIS ONLY APPLIES IF THE WPA FAIL TO MAKE THE APPROPRIATE CHANGES TO POLICY CS 26.	
Continue on a separate sheet/expand box if necessary	

<b>Declaration</b>	
I understand that all representations submitted will be made available for public inspection and will be identifiable to my name and organisation (if applicable).	
Signature: C Weetman	Date: 27/08/14

**Tracy Shand**

---

**From:** hotmail\_3edb534e38caff69@live.com on behalf of Ange McClelland  
[enquiries@thewescoebblackpool.com]  
**Sent:** 27 August 2014 01:56  
**To:** Development Plans  
**Subject:** local plan consultation document

Dear Sir or Madam

I write in response to the Blackpool Local Plan consultation document

First of all may I congratulate you on such a thorough & generally accurate document & say at the outset that my primary focus is the tourism-related content.

While I agree that tourism has declined since its hey-day in the 1960/70's, one only has to look at OTAs to see that Blackpool retains its attraction to visitors. A look at Booking.com will show you that at any one time x hotel received a booking 10 minutes ago, y hotel, an hour ago, z hotel 2 hours ago etc. Tourism IS alive and thriving in the resort. Similar looks at the Booking.com or Tripadvisor pages will also show guest ratings of each property featured on those pages & it is interesting to note that the perception that the accommodation currently on offer is not what modern travellers want is not reflected in guest feedback. It should also be noted that, in fact, the sort of budget accommodation offered by Travelodge is receiving very poor reviews when compared with the traditional B&B.

I agree that there are too many bed spaces in Blackpool (still) but my concern is that these will be converted into unofficial HMOs, hostels etc (as at present) unless stringent controls are put into place when hotels are allowed to de-commission.

Finally, I would like to bring to your attention that there is an obvious solution to many of Blackpool's tourism problems! Have you ever been to The Echo Arena in Liverpool? Or to the MEN Arena in Manchester? I have been to both several times & on each occasion I have stayed overnight. Let me tell you that the hotels are FULL with visitors every night, pubs, shops & restaurants are HEAVING! Investment has been drawn in through Arena development & major hotel chains have invested in quality accommodation. Conference facilities are attached to the arenas & both conferences AND concerts are year-round activities. Do you recall the recent Rod Stewart concert at Blackpool FC? 2 million pounds (The Gazette reported) was generated in resort by that ONE event! Multiply that by 4/5/6 nights per week!! My own small guesthouse had 80% occupancy for that one concert & i know that that was true for my colleagues. All of those guests had to eat somewhere & went out shopping or to the attractions during the day. The council has few pieces of land available for such a huge undertaking but has the perfect venue at the moment on the site of the old Pontins. It is large enough for an arena/conference centre plus a major-chain hotel. Eateries would FLOCK to Blackpool should such a plan come to fruition. Unemployment in Blackpool? How many jobs would be created by an arena? Office jobs, catering, security jobs, all permanent posts & not seasonal.

The Rod Stewart concert proves that people WILL come if there is something worth coming for. That's not to say that things haven't improved in Blackpool with all of the regeneration work but we all know it could be, & must be, better still.

Angela McClelland

28/08/2014

the wescoe  
14 Dean Street  
Blackpool  
FY4 1au

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THE TREES

RESIDENTS ASSOCIATION



Core Strategy Consultation

As a Residents Association our concern is naturally for our immediate neighbourhood and although the Strategy recognises these concerns, combating them in the present economic climate, with low property prices spawning more rental accommodation - police cuts, giving rise to concern about safety and security - make it difficult for people to see how the Core Strategy can implement anything, quickly enough, to prevent the imminent decline that the community sees happening.

Residents and businesses, have in the past, chosen, the North end of Whitegate Drive - some still do, Micheals Restuarant in the old Depository, Sainsburys and the return of the Number 3 hostelry, are encouraging but the number of empty properties and houses up for sale, is unprecedented.

What could redeem and give us support for our District Centre, giving the catalyst for regeneration, is the reference in the Strategy to (Policy CS8, CS12) ' the built heritage of the neighbourhoods ', this coupled with the article which hopes for two more conservation areas proposed by Cllr. Christine Wright, which would link a Heritage Visitor Attraction in the Winter Gardens, to the Stanley Park conservation area. A mind changing attitude for us, and to the continuing perception, that has been fostered by bad publicity, (as attached).

Taking the overall Core Strategy as a blueprint for Blackpools' future, must have been a prodigious undertaking - the planning Department and all who have had input into it, must be supported and congratulated for what we, endeared residents see as a long overdue indepth consideration of where Blackpool should be heading. With it, the future looks like a town well worth living and investing in.

Jack Shea.  
pp.Trees Residents Association,  
Brunswick Ward,  
2 Bryan Road,  
Blackpool. FY3 9BE.

22/08/14

**SEND YOUR LETTERS TO:**

**LETTERS PAGE, The Gazette, Avroe House, Avroe Crescent, Blackpool Business Park, Blackpool, FY4 2DP**  
or email [letters@blackpoolgazette.co.uk](mailto:letters@blackpoolgazette.co.uk).

please keep them short (300 words maximum) and include your name and address and a contact telephone number.

a number of advantages.

You can earn valuable practical experience whilst completing your qualification, which could put you three years ahead of your peers and once completed you will have a qualification that is equivalent to a masters level degree.

University experience could be an important part of your development, but it is always worth considering whether it is something you want to do, or are doing because you think it is the logical next step.

In today's competitive job market, three years' experience gained while studying for a professional qualification could put you ahead of your peers.

**Carol Helm**

*ACCA Lancashire and Cumbria Members' Network  
Chairman*

**CAB DRIVER'S HONESTY**

## Friendly

On Saturday, August 9, my wife, son, stepson and myself arrived in Blackpool for a few days' holiday.

We arrived early and spent a few hours on the front, before taking a taxi from Manchester Square to our hotel, The Stuart.

On arriving in the hotel I realised I had lost my bag containing two ipods, an iPad, a smart phone, my bus pass and wallet containing a small amount of money but more importantly my bank card.

Feeling very distraught we reported it missing to the reception, and the boys set out to try and trace the cab. Blessed relief when the receptionist brought the bag to us saying a black cab driver had just handed it in.



**BLACK CAB** A visitor left his bag containing valuable items behind in a taxi when he and his family booked in at their hotel. But the honesty and decency of the driver in handing them in at the hotel saved their holiday

We rushed down to thank and reward the driver but he had gone.

What could have been a complete disaster and ruined our break was saved by the honesty and decency of the black cab driver.

We did make an effort to trace him but to no avail.

We thoroughly enjoyed our stay in Blackpool. It was my first visit in over 50 years. I was pleasantly surprised by the town.

Expecting a rundown, almost derelict place (according to reputation) we found a friendly, welcoming, town, unpretentious and honest. There was plenty of entertainment for all ages and plenty of food outlets to cover every pocket

and taste. The town was very clean and the beach spotless.

We will certainly be praising the town to everyone we know on Twitter and FaceBook, and wish to especially thank the cab driver who was so honest and considerate to return my bag.

It was greatly appreciated and he personified Blackpool as a town that is caring and honest.

**David Powell**

*Southport*

**BUS SERVICE IS ERRATIC**

## Time wasted

My-wife waited at North Pier bus stop to travel to Fleetwood.

From 2.25pm the bus could be seen parked up for at least 10 minutes.

When it arrived it had Cleveleys as the destination on it.

The driver said it was late and had to turn round at Cleveleys.

He emptied the bus at Aldi in Cleveleys, which poses a question - if he is late why remain at Aldi for 15 minutes (that makes a total of 25 minutes wasted).

It looks like Fleetwood pensioners are being coerced into using the tram to Fleetwood.

The number one has been very erratic since the free tram finished. Coincidence?

**Mr J. Williams**

*Church Street  
Fleetwood*



ENGLISH HERITAGE  
NORTH WEST

Planning Department  
Blackpool Council  
PO Box 17  
Corporation Street  
Blackpool  
FY1 1LZ

Our ref: 1422

Your ref:

Date: 28<sup>th</sup> August 2014

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

Dear Sirs,

**Blackpool Local Plan: Part 1: Core Strategy – proposed submission (June 2014)**

Thank you for consulting English Heritage on the above document.

Located on the Lancashire coast between the Wyre and Ribble estuaries, Blackpool has a character that demands a category all its own. Existing as a nothing more than a coastal hamlet until as late as the mid-18<sup>th</sup> century, the town does not owe its form to slowly evolving in a traditional way over hundreds of years but is the result of an explosion in seaside tourism witnessed in the Victorian period. Its architecture is therefore largely of that phase or later. Its layout is a response to the need to ship in and out vast numbers of holidaymakers, to provide them with places to eat and stay, and to make available to them the latest forms of entertainment and leisure of the day.

A fashion for visiting the seaside for rest and clean air that took hold during the first half of the 19<sup>th</sup> century saw Blackpool's population increase five-fold. From the 1840s the railway linked the growing seaside resort to the industrial areas of north-west England bringing an influx of new settlers as well as huge numbers of working class tourists. In 1911, Blackpool's Central Station was the busiest rail station in the world. The seafront and promenade were (and still are) the focus of activity but a vast hinterland swathe of streets with guest-houses and small hotels grew to accommodate the new arrivals.

Entrepreneurs responded admirably to the challenge of keeping these holidaymakers entertained. In 1878 the Winter Gardens with its Pavilion Theatre and Empress Ballroom opened 250m inland from the seafront as a place to enjoy even on inclement days. Blackpool Tower, built by two Lancashire architects to a similar design as Gustave Eiffel's, opened its doors in 1894. The three piers were constructed during the Victorian era, the North Pier was the first to appear in 1863 for gentle relaxation, Central Pier in 1868 was the

1

SUITES 3.3 AND 3.4 CANADA HOUSE 3 CHEPSTOW STREET MANCHESTER M1  
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available



location for fun and games and South Pier in 1863 as the family pier and all three still remain today. These unique heritage assets make a significant contribution to the character of the town.

To summarise the key features of the historic environment of the town, which play an important role in defining its unique character and identity, include:

- Unusual town form due to almost single phase evolution in response to 19<sup>th</sup> century tourism boom.
- Vast hinterland of small hotels and guest houses.
- Blackpool Winter Gardens
- Blackpool Tower
- Heritage Tramway – one of the oldest in the world.
- Three piers of which all are still in use.
- Stanley Park
- New additions to townscape such as sea defences, performance spaces and Comedy Carpet are well-designed using high quality materials and are consequently very successful interventions.

**The Local Plan**

The historic environment in Blackpool is an important part of the area and makes a significant contribution including its economic well-being. The Local Plan (currently) is considered to be unsound as it fails to meet the requirements of the NPPF regarding the following issues:

- It is not based on adequate, up-to-date and relevant evidence about the historic environment;
- It does not set out a positive strategy for the conservation, enhancement, improvements and enjoyment of the historic environment;
- It does not contain strategic policies to deliver the conservation and enhancement of the historic environment;

Further detailed comments are set out in the table below.

Page	Section	Sound/ Unsound	Comments	Suggested amendment
-	Evidence base	Unsound	A requirement of the NPPF (Paragraph 169) is that a sound local plan will be based on a strong up-to-date evidence base about the historic environment. This should be used to assess the significance of the heritage assets in the area and the contribution they make to	The Plan needs to have a strong evidence base on the historic environment and this be used to inform the Plan.



Page	Section	Sound/ Unsound	Comments	Suggested amendment
			<p>the town.</p> <p>The published evidence base available on the Council's website lacks sufficient evidence that relates to the historic environment. This lack of evidence is reflected in terms of the historic environment throughout the Plan.</p>	
13	2. A Spatial Portrait of Blackpool	Unsound	<p>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.</p>	<p>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.</p>
13	Paragraph 2.23	Unsound	<p>The Plan refers to the rich social and built heritage; however, this has not been identified in the Plan. This paragraph then goes on to refer to the fact that there are few listed buildings which reflects a poor quality environment. The NPPF defines the historic environment as <i>"All aspects of the environment resulting from the interaction between people and places though time, including all surviving physical remains of past human activity..."</i> In other words it is more than just the sum of designated assets. With this in mind the Plan should put forward a more positive</p>	<p>The Plan should be amended to describe the unique built environment in Blackpool and reference should be made to its important iconic heritage assets.</p>

Page	Section	Sound/ Unsound	Comments	Suggested amendment
			description of the built environment in Blackpool.	
13	Paragraph 2.23	Unsound	<p>The list of heritage assets is inaccurate:</p> <p>Listed Buildings: 41</p> <p>Grade I: 1 Grade II*: 4 Grade II: 36 Parks and Garden: 1 Conservation Areas: 2</p>	<p>The Plan should be amended to correctly record the number of listed buildings:</p> <p>Listed Buildings: 41</p> <p>Grade I: 1 Grade II*: 4 Grade II: 36 Parks and Garden: 1 Conservation Areas: 2</p>
17	Paragraph 2.37 Bullet 6	Unsound	<p>As mentioned above, the Plan needs to provide a detailed spatial portrait of the historic environment in Blackpool including its unique identity and character.</p> <p>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.</p>	<p>The Plan should be expanded to detail the historic environment in the town and the importance of it to tourism, economic well-being etc. and this can therefore inform a more specific priority issue for the historic environment.</p>
22	A Vision for Blackpool	Unsound	<p>The NPPF requires that the Local Plan should contain a strategy for the conservation and enhancement of the historic environment.</p> <p>The vision mentions two historic assets the Tower and Winter Gardens but does very little to put forward a vision for the long term conservation and enhancement of the historic environment including other assets such</p>	<p>The Vision for Blackpool should be amended to ensure that the historic environment in Blackpool as a whole is conserved and enhanced including specific heritage assets such as the Tower, Winter Gardens, Grand Theatre, the three piers etc. All of these should have been identified earlier on in the Plan.</p>

Page	Section	Sound/ Unsound	Comments	Suggested amendment
			as the three piers, tramway, and Stanley Park.	
23	Goal 1: Sustainable Regeneration, diversification and Growth  Bullet 6	Unsound	<p>The NPPF requires that the Local Plan should contain a positive strategy for the conservation and enhancement of the historic environment.</p> <p>We welcome this objective which aims to conserve and enhance Blackpool's rich heritage.</p> <p>However, the Plan to this point appears very negative in its references to the historic environment and at no point is there any detail to inform the Plan's reference to "rich". The historic environment is more than the sum of its designated assets (refer to the NPPF). The Plan needs to do more to identify this (see previous comments) to inform this objective.</p>	The Plan should be amended to detail the historic environment in Blackpool and also its unique identity and character.
24	Goal 3 Bullet 14	Unsound	<p>The NPPF requires that the Local Plan should contain a positive strategy for the conservation and enhancement of the historic environment.</p> <p>Whilst the inclusion of reference to heritage in this objective is supported. The Plan does very little to support this objective through identifying and describing the significance of the historic environment which this objective aims to sustain.</p>	The Plan needs to be expanded to detail the historic environment and the heritage assets in the area and make an assessment of their contribution.

Page	Section	Sound/ Unsound	Comments	Suggested amendment
45	Paragraph 5.52	Unsound	The Winter Gardens is a Grade II* Heritage Asset. This paragraph assumes that the redevelopment of the building for retail use is considered appropriate. The Winter Gardens was designed as an entertainment complex and any proposals put forward for the building should be in line with the Conservation Management Plan. English Heritage would not support a scheme to convert the building into retail use.	The Plan should be amended to delete reference to the redevelopment of the Winter Gardens for retail use.
54	Policy CS6: Green Infrastructure	Unsound	<p>The NPPF requires that Local Plan policies should contain a positive strategy for the conservation and enhancement of the historic environment. The historic environment should be considered in delivering a number of other planning objectives.</p> <p>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.</p> <p>There is no mention of the two conservation areas and Stanley Park within the policy itself.</p>	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.
56	Paragraph 5.96	Unsound	Stanley Park is listed Grade II* and not Grade II. The importance of this heritage asset needs to be included within the Green	The Plan should be amended to ensure that the important asset, Stanley Park is conserved and enhanced and therefore should be referred to in the Policy

Page	Section	Sound/ Unsound	Comments	Suggested amendment
			Infrastructure policy.	CS26 Green Infrastructure.  The listed status of Stanley Park should be amended to read Grade II* and not Grade II.
61	Policy CS8 Heritage  General	Unsound	<p>The NPPF requires that Plan Policies should contain a positive strategy for the conservation and enhancement of the historic environment. In particular it should contain strategic policies for the conservation and enhancement of the historic environment.</p> <p>Whilst we welcome the inclusion of a specific policy for heritage, it does not properly address how the presumption in favour of sustainable development should be applied locally (Para 15).</p> <p>The policy as drafted is generic and does not detail the priorities for Blackpool and the long term strategy for its historic environment. This should ideally be informed from the evidence base and the spatial portrait of the Borough. At the moment, there is little to localise this policy.</p> <p>The Plan clearly states that there will be a separate section on development management policies; however this policy appears to contain some development management policy.</p>	<p>The policy should be amended to recognise the importance of the historic environment in Blackpool and should be specific to the area.</p> <p>The policy should also be amended to ensure that there is a strategy for the town's historic environment incorporating the main priorities outlined in the draft heritage strategy (separate document), this could include the conservation, enhancement and preservation of the town's historic environment including:</p> <ul style="list-style-type: none"> <li>• The town's key heritage assets including The Tower, Winter Gardens, Grand Theatre and the three Piers.</li> <li>• The unusual 19<sup>th</sup> Century town form including its Victorian hotels and guesthouses.</li> <li>• The Heritage Tramway – one of the oldest in the world.</li> <li>• Conservation areas</li> <li>• Stanley Park</li> <li>• New additions to townscape such as sea defences, performance spaces and Comedy Carpet.</li> </ul> <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> </ul>

Page	Section	Sound/ Unsound	Comments	Suggested amendment
			<p>In general, the policy does not particularly accord with the requirements of the NPPF with regards conserve/sustain and enhance the significance of the historic environment.</p> <p>It is understood that the Council is preparing a built heritage strategy which will be separate to the Local Plan. Some of the content of this strategy needs to be part of this policy; as such a document will not have the same weight as the Local Plan when it comes to planning decisions.</p>	<ul style="list-style-type: none"> <li>• Enhance existing conservation areas of Stanley 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 and heritage committees.</li> </ul>
61	Policy CS8: Heritage	Unsound	The Plan should put forward a strategy for the town's later 20 <sup>th</sup> Century buildings and identify any that are of architectural significance and worthy of preservation prior to identifying areas for potential redevelopment.	The Plan should be amended to put forward a strategy which recognises the importance of the town's later 20 <sup>th</sup> Century buildings and identify those of significance.
61	Policy CS8: Heritage  Paragraph 1	Unsound	<p>It is unclear what this paragraph's aspiration for the town is.</p> <p>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</p>	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.

Page	Section	Sound/ Unsound	Comments	Suggested amendment
			requirement for development proposals to meet the requirements of the NPPF on this matter and not just “ <i>respect and draw inspiration</i> ”.	
61	Policy CS8: Heritage  Paragraph 2	Unsound	This appears to be a series of requirements for development proposals therefore should this be contained in Part 2 of the Plan?  Even so it does little to support the requirements of the NPPF, with regards the harm to the significance of heritage assets and the need for proposals to conserve and enhance them. This policy should be amended to reflect the uniqueness of Blackpool and what it is development proposals are expected to have regard to (this information can be sourced from the assessment of the historic environment in Blackpool).	The Plan should be amended to ensure the significance of Blackpool’s heritage assets are conserved and enhanced and any harm minimised.
61	Policy CS8: Heritage  Paragraph 3	Unsound	This appears to be a development management policy but does not have regard to the requirements of the NPPF in relation to the significance of heritage assets and the need to conserve and enhance and minimise harm.	The policy should be amended to reflect the requirements of the NPPF.
61	Policy CS8: Heritage  Paragraph 4	Unsound	The NPPF requires that Plan policies should contain a positive strategy for the conservation and enhancement of the historic environment.	The Plan should be amended to ensure that there is adequate protection for the historic environment in Blackpool and any harm to the significance of its assets should be minimised.

Page	Section	Sound/ Unsound	Comments	Suggested amendment
			The starting point for any proposals that affect the historic environment should be that they conserve and enhance and better reveal their significance. This policy does not provide adequate protection to the historic environment and does not provide a strong position because it looks at “seek to safeguard” rather than ensure that any harm to the significance of heritage assets will not be supported.	
61	Policy CS8: Heritage  Paragraph 5	Unsound	Whilst we welcome reference to a local list, this part of the policy is merely stating that the Council has one; it does not put forward a strategy for its use and implementation. There is also an opportunity to mention the Council’s intention to produce a heritage strategy and endorse its content.	The Plan should be amended to ensure that any supplementary planning documents and strategies are endorsed within the Plan and that a strategy for their use and implementation is included. Reference should also be made to the heritage strategy.
66	CS10 Sustainable Design and Renewable and Low Carbon Energy	Unsound	The NPPF requires that Plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in delivering a number of other planning objectives.  This policy fails to make reference to the historic environment. We would welcome the requirement for renewable energy proposals to avoid any	Insert additional text in point 3a of this policy to read:  “Are located appropriately and do not cause an unacceptable impact on surrounding uses or the local environment, <b>heritage assets</b> , landscape character or visual.....”

Page	Section	Sound/ Unsound	Comments	Suggested amendment
			impact on the historic environment.	
69	Policy CS11: Planning Obligations	Unsound	<p>The NPPF requires that Local Planning Authorities set out in their Local Plan, a positive strategy for the historic environment including heritage assets most at risk through neglect, decay and other threats.</p> <p>Blackpool currently has a number of entries on the National Heritage at Risk Register, and there are opportunities for their enhancement through planning obligation contributions.</p> <p>Therefore the Policy would benefit from reference to the historic environment including the above.</p>	<p>The Policy should be amended to include an additional bullet point c:</p> <p><i>“Opportunities to conserve and enhance the historic environment including heritage at risk are met.”</i></p>
73	CS12 Sustainable Neighbourhoods	Unsound	<p>Whilst we welcome the inclusion of criteria that expects new development to <i>“reflect the built heritage of the neighbourhoods and enhances the appearance of important existing buildings and their settings”</i>. This does not particularly accord with the requirements of the NPPF in terms of conserving and enhancing the historic environment and reinforcing local identity and character and it is recommended that the policy be amended to reflect this.</p> <p>However, the Plan (as previously mentioned)</p>	<p>Bullet E should be amended to read:</p> <p><i>“Reinforces Blackpool’s local identity and character whilst conserving and enhancing its historic environment and important heritage assets”</i></p>

Page	Section	Sound/ Unsound	Comments	Suggested amendment
			needs to include a proper and accurate assessment of the historic environment in Blackpool to help inform this policy.	
85	Policy CS16: Traveller Sites	Unsound	<p>The NPPF requires that Plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in delivering a number of other planning objectives.</p> <p>This policy fails to make reference to the historic environment. We would welcome the requirement for new traveller sites to avoid any impact on the historic environment.</p>	Additional text to be inserted into bullet point C to refer to the historic environment.
90	Policy CS17: Blackpool Town Centre  Bullet C	Unsound	The starting point for the historic environment in Blackpool should be the need to conserve and enhance its significance and improve heritage assets that are neglected or in need of enhancements. The word “ <i>exploitation</i> ” does not accord with the requirements of the NPPF on this matter.	<p>The Plan should be amended to read:</p> <p><i>“Conservation and enhancement of key heritage assets within the town centre...”</i></p>
90	Policy CS17: Blackpool Town Centre  Bullet e	Sound	We welcome the initiative to improve the quality of the built environment and the public realm.	-
90	Policy CS17: Blackpool Town		This refers to ‘ <i>high quality residential offer in the longer term</i> ’. The Plan would benefit from defining what	The Plan needs to be amended to put forward a strategy for the Victorian properties that contribute to the historic

Page	Section	Sound/ Unsound	Comments	Suggested amendment
	Centre Bullet G		<p>it means by high quality e.g. ecologically sound, using traditional materials and techniques, design and materials that reflect local character and distinctiveness?</p> <p>Blackpool has a huge resource of neglected Victorian properties – former guest houses and HMOs. In line with the principles of sustainable development the Plan should put forward the need to retain this stock as it contributes towards the unique character and identity of the town and the Plan should aim to refurbish the existing housing stock.</p> <p>The Plan also needs to look carefully at hotel offer. If the swathes of guest houses are out of fashion with visitors and can be refurbished as residential, can the Plan identify new sites for new hotels that provide the type of accommodation demanded by modern tourists?</p>	<p>environment in Blackpool.</p> <p>The Plan should also be amended to clarify what “high quality” residential offer means.</p>
91	Para 7.5	Unsound	<p>The Plan describes the Winter Gardens as being adjacent to the principal retail core and highlights the Winter Gardens as having potential in terms of retail offer. Whilst we welcome the Plan placing the Winter Gardens at the heart of a new quarter and the Council’s recognition of the</p>	<p>The Plan should be amended to delete reference to the regeneration of the Winter Gardens for retail use.</p>

Page	Section	Sound/ Unsound	Comments	Suggested amendment
			complex as having an active role to play in regeneration. English Heritage would not support a scheme to place retail at the heart of the regeneration of the Winter Gardens; this was designed as an entertainment complex and retail use would not provide the 'out of hours' vitality or long term sustainability needed for the site. Some retail that complements the proposed main new uses (cinema, conference, hotel etc.) would be acceptable but not as the main plan for the Winter Gardens.	
94	Policy CS18: Winter Gardens  Paragraph 2	Unsound	<p>Development proposals are expected to minimise harm to the significance of heritage assets and should seek to conserve and enhance them including their setting. The Plan does not accord with the requirements of the NPPF on this matter.</p> <p>The Council is intending to update the Conservation Management Plan for the Winter Gardens and therefore this needs to be included within the Plan. The Plan also should refer to the need for this to be kept up to date. Any development proposals should be required to confirm to this management plan and not the conservation statement.</p>	The Plan should be amended to read "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".

Page	Section	Sound/ Unsound	Comments	Suggested amendment
			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.	
94	Policy CS18: Winter Gardens	Unsound	The Plan fails to refer to the building being on the national Heritage at Risk register. The policy should refer to this and 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.
94	Policy CS18: Winter Gardens  Paragraph 7.12 and 7.13	Unsound	<p>We welcome the Council's acknowledgement and recognition of the Winter Gardens as playing an instrumental part in the regeneration of the town.</p> <p>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.</p> <p>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.</p>	<p>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.</p> <p>The description of the Winter Gardens should be amended.</p>

Page	Section	Sound/ Unsound	Comments	Suggested amendment
96	Policy CS20: Leisure Quarter	Unsound	<p>We welcome this policy which puts existing historic assets at the heart of a new Leisure Quarter – most obviously the Winter Gardens.</p> <p>Blackpool Tower is notable by its lack of mention not only within this policy but in the Plan as a whole. The Tower should be highlighted as one of the key components of the Leisure Quarter and a commitment to maintaining its physical structure and its role in the town economy should be outlined in the Plan as a whole.</p> <p>There is no mention of the piers; these are arguably of similarly iconic status to the Winter Gardens and Tower. These should be highlighted as 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</p>	<p>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.</p>

Page	Section	Sound/ Unsound	Comments	Suggested amendment
			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?	
96	Policy CS20: Leisure quarter  Bullet a	Sound	We welcome the acknowledgement in the Plan that any new development in the Leisure Quarter must 'respond to Blackpool's historic townscape and character'.	-
98	Policy CS21: Leisure and Business Tourism	Unsound	<p>The NPPF requires that Plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. It also requires Local Plans to set out a clear economic vision and strategy for the area, which identifies and promotes economic growth identifying priority areas and environmental enhancements.</p> <p>Tourism and culture is of major importance to Blackpool and is a major contributor to the economy (as mentioned in the Plan).</p> <p>This policy fails to recognise the importance of the historic environment in building a strong and competitive economy (NPPF) and in</p>	<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.</p> <p>The Plan should also be expanded to include a proper and accurate assessment of the historic environment.</p>

Page	Section	Sound/ Unsound	Comments	Suggested amendment
			<p>ensuring its status as a top seaside resort through promotion of its leisure and tourism offer.</p> <p>There has been no proper and accurate assessment of the historic environment of Blackpool in the Plan. 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 policy.</p>	

If you have any questions on the above, please do not hesitate to contact me.

Yours sincerely,

*E. Hrycan*

**Emily Hrycan**

Historic Environment Planning Adviser (North West)

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ENGLISH HERITAGE  
NORTH WEST

Planning Department  
Blackpool Council  
PO Box 17  
Corporation Street  
Blackpool  
FY1 1LZ

Our Ref: 1469  
Your Ref:  
Date: 28<sup>th</sup> August 2014

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

Dear Sirs,

**Blackpool Local Plan: Part 1: Sustainability Appraisal**

Thank you for consulting English Heritage on the above.

English Heritage has raised a number of issues in relation to the soundness of the Blackpool Local Plan and the historic environment (see letter dated 28<sup>th</sup> August 2014 reference: 1422).

To summarise, the Plan is considered unsound for the following reasons:

- It is not based on adequate, up-to-date and relevant evidence about the historic environment;
- It does not set out a positive strategy for the conservation, enhancement, improvements and enjoyment of the historic environment;
- It does not contain strategic policies to deliver the conservation and enhancement of the historic environment;

In view of the above, English Heritage disagrees with the content of the Sustainability Appraisal, in particular on the following matters:

Policy	Comments
CS6 Green Infrastructure	We disagree with the Sustainability Appraisal 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.
CS8 Heritage	We disagree with the Sustainability Appraisal 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



Policy	Comments
	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.
CS10 Sustainable Design	We disagree with the Sustainability Appraisal 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.
CS11 Planning Obligations	We disagree with the Sustainability Appraisal 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 considered to have a major negative impact on the achievement of the SA Objective on Heritage.
CS16 Traveller Sites	We disagree with the Sustainability Appraisal 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.
CS17 Blackpool Town Centre	We disagree with the Sustainability Appraisal 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.
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.
CS20 Leisure Quarter	We disagree with the Sustainability Appraisal 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)

Policy	Comments
	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.
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.

Finally, we would like to stress that this opinion is based on the information provided within the report. To avoid any doubt, this does not affect our obligation to provide further advice and potentially object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the Plan) where we consider that, despite the SA/SEA, these would have an adverse effect upon the historic environment.

Yours sincerely,

*E. Hrycan*

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## THE HOME BUILDERS FEDERATION

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Blackpool Council,  
PO Box 17,  
Corporation Street,  
Blackpool FY1 1LZ

Date: 29<sup>th</sup> August 14

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

### Sent by Email only

Dear Sir / Madam,

## **Blackpool Local Plan: Core Strategy (Submission)**

Thank you for consulting with the Home Builders Federation (HBF) on the Local Plan: Core Strategy.

The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock. We would like to submit the following comments.

**The HBF would also like to attend the examination in public to debate these matters further.**

### **Approach to plan preparation**

**The approach towards producing multiple planning documents is unsound as it is not consistent with national policy.**

The National Planning Policy Framework (NPPF) is clear that;

*'Each Local Planning Authority should produce a Local Plan for its area... Any additional Development Plan Documents should only be used where clearly justified'. (paragraph 153)*

Similarly the National Planning Practice Guidance (NPPG) states;

*'The National Planning Policy Framework makes clear that the Government's preferred approach is for each Local Planning Authority*

*to prepare a single Local Plan for its area (or a joint document with neighbouring areas). Whilst additional Local Plans can be produced, for example a separate site allocations document or Area Action Plan, there should be a clear justification for doing so.'* (12-1012-20140306)

The HBF is unaware that the Council has sought to provide any justification for its continued approach towards plan preparation as opposed to that advocated by Government policy.

## **Plan period**

The plan period ends in 2027 which will not provide a 15 year time horizon post adoption, this is contrary to national policy and therefore the plan is unsound.

The NPPF clearly states (paragraph 157) that Local Plans should be drawn up over an appropriate timescale, '*preferably a 15 year time horizon*'. The Blackpool Core Strategy has an end date of 2027 and is not due to be adopted until 2015 at the earliest. Therefore it will only provide a maximum 12 year time-horizon post adoption. If modifications or additional evidence-gathering work are required as part of the examination, the time horizon will be even less.

The Council has given no reasons why it has deviated from the preference set out in national policy. Indeed its own evidence base upon objectively assessed housing needs has an end date of 2030, three years longer than the Core Strategy. Therefore the Core Strategy is not even compliant with the time frames of its evidence base.

The NPPF also advocates a single plan approach, as discussed above. This single plan would contain both strategic policies and land allocations. In contrast Blackpool is proposing a Core Strategy followed by a '*Site Allocations and Development Management Policies Document*'. This second part of the plan will need to be in conformity with the Core Strategy and as such will have also an end date of 2027. According to the Council's *Local Development Scheme* (LDS) the '*Site Allocations and Development Management Policies Document*' will not be adopted until June 2018 at the earliest, giving a maximum time horizon after adoption of 9 years. This is significantly less than the Government's preference for a 15 year time horizon for a single Local Plan.

It is difficult to reconcile the differences between the plan, its evidence base and the NPPF and as such it does not appear that the current approach can be remedied through amendments to the plan.

## **Sustainability Appraisal**

Whilst the HBF notes that a Sustainability Appraisal (SA) of the Core Strategy has been undertaken. The SA has not considered the outputs from the most recent Strategic Housing Market Assessment (SHMA) in relation to an objectively assessed housing need. Given that the SHMA identified a possible range for the assessment of need, and that this is a fundamental element of the plan, surely the SA should have considered the relative impacts of the various scenarios proposed.

The HBF considers this to be a significant failing of the plan and plan-making process. The most recent SA simply states;

*'The 2013 Strategic Housing Market Assessment identified a range of alternative housing figures which have been considered in the Housing Technical Paper (June 2014). The range included high, medium and low growth scenarios. However, in considering the options the Council concluded that the high and low growth figures would not deliver the needs of the local community as set out in the Core Strategy. As such, no alternative housing growth scenarios were assessed as part of this SA at this stage.'*

It is unclear how the Council came to these conclusions but it is clear it was not through the SA process. The HBF considers that the SA should have considered the impacts, both positive and negative of the range within the suggested objectively assessed housing need prior to publishing its submission version of the Core Strategy.

### **Duty to co-operate**

The Duty to Cooperate is not a duty to agree. However, the duty requires more than consultation and meetings. It is the efficacy of the engagement throughout the plan making process and the outcomes which flow from such engagement which determine whether the duty has been met.

The importance of identified actions resulting from fulfilment of the duty is clearly articulated within the National Planning Practice Guidance (NPPG). The NPPG states *'it is unlikely that this (the duty) can be satisfied by consultation alone'* and that *'inspectors will assess the outcomes of the co-operation and not just whether local planning authorities have approached others'*. The guidance is echoed in recent concerns raised by inspectors over compliance with the duty. The plans of Coventry, Hart, North West Leicestershire, Kirklees and Mid-Sussex Councils are such examples. In all cases the inspector noted that compliance with the duty needs to go beyond merely consulting with neighbouring authorities, but rather it should implement actions and have evidence of high level agreements to tackle strategic issues, including housing.

Table A of the Council's *Duty to Co-operate Statement* does identify a number of issues which have been discussed between the Council and other parties. Likewise the Memorandum of Understanding is also noted. The HBF is, however, unconvinced that the duty has been adequately discharged in relation to housing.

It is noted that Blackpool considers itself a constrained authority with limited development potential (Core Strategy Spatial Portrait). As such whilst intending to meet its own needs it will not be able to assist meeting the needs of others. The Council notes that no evidence has been provided that indicates neighbouring authorities cannot accommodate their own needs as no requests have been made. The HBF does not consider that silence on all sides represents full compliance with the duty.

Whilst the issue of the housing requirement is dealt with in greater detail against Policy C2 it is worth considering the outputs of the Flyde Coast Strategic Housing Market Assessment (SHMA) in relation to the duty. Chapter 11 of the SHMA considers the range of housing needs across the Flyde Coast area and provides an analysis of the likely objectively assessed housing needs for the Flyde Coast area, suggesting a combined range of between 890dpa to 1,305dpa over the period to 2030. The economic scenarios suggest a more defined range of 1,180dpa to 1,240dpa for Flyde Coast.

Blackpool is joined within the Flyde Coast by the authorities of Fylde and Wyre. Whilst both of these authorities 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. If the economic scenarios are considered it is 375dpa short of the lowest economic projections. Whilst the HBF is not suggesting that Blackpool should take all of this requirement a more detailed understanding between all three authorities is required. Therefore if one or more of the authorities cannot meet their own needs solutions can be considered.

In summary the HBF remain unconvinced that the Council has adequately discharged its Duty to Co-operate in relation to housing and as such 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.

## **Policy CS2: Housing Provision and paragraphs 5.1 to 5.22**

Policy CS2 and the associated text are considered unsound as they are not positively prepared, justified by the evidence or effective.

The HBF has numerous concerns relating to Policy CS2 and the text associated with the policy, under the heading '*Housing Provision*'. These concerns relate to the policy wording, objectively assessed housing needs, components of the supply and phasing. For clarity each issue is dealt with separately below.

### **Policy Wording**

The NPPF requires plans to be positively prepared, to provide a significant boost to housing supply and be aspirational, yet realistic. The current policy wording is not considered to be positively prepared or aspirational. The HBF considers that the words '*...delivery of around...*' should be replaced by '*...delivery of at least...*'. This would provide a more positive framework for the housing allocations and identify that the Council is aiming to achieve, as a minimum, its objectively assessed need. The HBF considers such a statement would more closely align the policy with the Government objectives for positive planning and providing a significant boost to housing supply.

### **Objectively Assessed Need**

The plan aims to deliver 4,200 homes over the plan period (2012 to 2027) which equates to an average of 280dpa. This is a significant reduction upon the

revoked Regional Strategy (RS) annual requirement of 444dpa. Whilst it is recognised that the RS requirement was founded upon ambitions for significant economic growth within Blackpool, which the Council supported, the reduction in the housing requirement of 164dpa is not considered sufficient to meet the Government's stated aspirations to boost significantly housing supply.

The revocation of the RS has meant that local authorities now have a duty to identify their own objectively assessed needs for housing. Paragraph 159 of the NPPF requires a local planning authority and where necessary neighbouring authorities working together to prepare a Strategic Housing Market Assessment (SHMA), which assesses housing needs in full across the relevant Housing Market Area (HMA). As discussed previously we note that Blackpool are solely intending to meet their own needs, despite this a joint SHMA was provided for the three Fylde Coast authorities of Blackpool, Fylde and Wyre Councils. Further discussion upon the regional implications of the Blackpool housing requirement are set out within our comments upon the Duty to Co-operate.

The 2014 SHMA has undertaken modelling of a number of different scenarios to assist the Council in identifying an objectively assessed housing need for the Fylde Coast and Blackpool. In terms of Blackpool the SHMA suggests that its objectively assessed housing need is within the range of 250 to 400dpa. The Council's chosen requirement of 280dpa sits at the bottom end of this range and therefore the aspirations of the Council and whether the plan is considered positively prepared require consideration.

The starting point for objectively assessing housing needs are the population and household projections provided by Office of National Statistics (ONS) and Department of Communities & Local Government (DCLG) taking into account both migration and demographic change. However the National Planning Practice Guidance (NPPG) identifies that DCLG household projections assume that external factors like the economy and land supply, which have influenced past demographic change, remain the same in the future. As a consequence if in the past the economy has been in recession or land use planning policy has been overly restrictive, trend based projections will under-estimate need. For this reason demographic projections should always be used as minimums (ID 2a-015-20140306).

In terms of Blackpool the relevant household projections are the 2008 based Sub National Household Projections (SNHP) and the 2011 interim SNHP. The 2011 interim SNHP represent the most recent set of projections produced by CLG. For Blackpool they indicate a household formation rate of just 30dpa. This is a very low formation rate and partially mirrors the recent net outflow of population within Blackpool over the period of the recession. The HBF does, however, recommend that significant caution is used when considering the 2011 interim SNHP. This is because of the significant issues relating to these projections including the fact they are only interim and do not cover the full plan period, they are representative of a recessionary period and the CLG note numerous issues with the datasets. A reliance upon the 2011 interim SNHP would be tantamount to planning for recession and as such not in the spirit of

the NPPF. The Inspector's Interim Conclusions on the South Worcestershire Development Plan (October 2013) provide a useful background to this matter.

The 2008 based SNHP whilst somewhat dated do therefore provide the most up to date reliable national household forecasts. For Blackpool, utilising the *What Homes Where* toolkit this identifies a starting point of 288dpa over the plan period (2012 to 2027), this figure suggests a starting point for identifying an objectively assessed housing need greater than the average plan requirement (280dpa).

The NPPG further identifies that plan makers should assess employment trends (ID 2a-018-20140306). In terms of employment the Council has indicated that it is committed to seeking economic growth for Blackpool, for example objective 17 of the plan seeks growth in the Blackpool Airport Corridor and the plan is seeking provide additional employment land, in part jointly with Fylde. The 2014 SHMA considered two economic scenarios, one founded upon Experian data and one upon Oxford Econometrics data. The HBF believe both of the tested economic scenarios to be 'policy off' scenarios and represent forecasts of future employment change without any interventions. A 'policy on' approach would consider the impact of interventions such as the employment opportunities presented along the Blackpool Airport Corridor or the, albeit controversial, potential for Shale Gas production within the Fylde Coast area. It is therefore considered that the economic scenarios presented should be minimums rather than maximums if the Council is seeking to meet the NPPF requirements to plan positively for growth and boost significantly housing supply.

The Experian forecast suggests jobs growth of 82 jobs per annum which would require an annual housing target of approximately 400dpa. The Oxford Econometrics forecast suggests a reduction in jobs of 67 jobs per annum and a resultant annual housing target of 263dpa. It is noted that the AMION report *'Towards an Objective Assessment of Housing Need in Blackpool'* suggests that the Oxford Econometrics forecast more closely aligns with local policy expectations (paragraph 5.1.3). The housing requirement derived from this figure also most closely matches the Council's proposed housing requirement (280dpa). This forecast indicates over 1,000 job losses within Blackpool over the plan period. The HBF does not consider that basing a plan upon a scenario which would lead to a continuance of job losses within the district represents positive planning, yet the plan at paragraph 5.7 accepts this to be the case. This is contrary to the ethos of the NPPF. Paragraph 18 clearly states the Government's commitment to economic growth *'in order to create jobs'*. The HBF contends that a positively prepared plan would seek job growth over the plan period and provide a housing requirement commensurate to that level of jobs growth. If, as suggested by the AMION report and the Oxford Econometrics forecast, jobs are anticipated to decline the Council and its partners should seek to make policy interventions.

Only two of the scenarios tested within the SHMA identify jobs growth over the plan period. These are the Experian based economic forecast, discussed above, and the 'Re-based 2010 SNPP' scenario which suggests annual jobs growth of 65 and a resultant housing requirement of 340dpa. It is therefore clear

to the HBF that a positively prepared plan should be seeking as a minimum to meet at least 340dpa. It is further noted that if improved economic activity rates are factored into the scenarios a third scenario, 'Migration-led 10 year average' also shows jobs growth and a housing requirement of 248dpa. However the HBF concurs with the 2014 SHMA that changing economic activity rates would need to be justified by robust evidence, which does not currently exist.

The NPPG also requires local authorities to consider market signals such as land prices, house prices, rents, affordability, rates of development and overcrowding (ID 2a-019-20140306). A worsening trend in any indicator requires an upward adjustment to planned housing numbers compared to ones based solely on household projections (ID 2a-020-20140306).

In terms of affordability the 2014 SHMA identifies an affordable housing need of 264 dwellings per annum, just 16 dwellings less than the proposed overall annual average housing requirement for both market and affordable housing. It is therefore clear that the Council will not be able to meet its objectively assessed needs for both affordable and market housing in full, as required by paragraphs 47 and 159 of the NPPF. The affordable housing requirement has also increased over recent years nearly doubling since the 2008 SHMA, which identified a requirement for 140dpa. This significant and worsening trend in affordability adds greater weight to the argument that the proposed housing requirement is not sufficient to meet the objectively assessed housing needs of the area.

In light of the above comments the HBF recommends that the Council 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.

### **Components of the housing requirement**

The plan indicates that the housing requirement will be delivered from three different sources, identified sites within the urban area / regeneration areas, sites in south Blackpool and windfalls. The plan places a significant emphasis upon windfalls, with 1,500 dwellings anticipated over the full plan period. This accounts for almost 36% of the plan requirement.

The NPPF (paragraph 48) indicates windfall allowances can be made in the 5 year supply providing there is compelling evidence such sites consistently come forward. The '*Housing Technical Paper*' paragraph 5.23 suggests that since 2003 windfalls have provided a significant source of supply and that the continued conversion of holiday accommodation suggests that this supply will continue. Whilst the HBF does not dispute that windfalls have been a significant source of supply in Blackpool over recent years this must be considered against a lack of allocated sites within the plan and the fact that since 2003 the Council has failed to meet its housing requirement set within the RS. Failure to deliver against windfall targets will detrimentally impact upon the delivery of the plan and the demonstration of a five year supply of housing land. It is therefore recommended that a cautious approach is adopted and the use of a windfall

allowance is not used as a mechanism to reduce the number of sites allocated within the plan.

It is equally important that the delivery of windfall sites against the assumptions identified is closely monitored through the AMR. Failure to achieve the windfall assumptions will require the Council to consider releasing other sites, or to review its plan, to ensure a 5 year housing supply and fulfils the housing requirements within the plan.

The HBF welcomes the statement within paragraph 5.13 of the plan that;

*'...in recognition of Blackpool's difficult housing market and the risks in delivering more challenging sites, the SHLAA will identify a reasonable buffer of sites (around 30% although this will be kept under review) beyond what is required over the plan period, to provide flexibility should some sites not come forward as anticipated.....'*

It is, however, unclear how this would work in practice and whether the additional sites are themselves constrained. Greater clarity is required upon this issue.

### **Phasing**

Plan paragraphs 5.19 to 5.22 discuss phasing of the housing requirement and the five year supply. The phasing would create a three stepped requirement rising from 250dpa at 2012 to 280 in 2017 and 310 in 2022. The Council consider that such a phased approach is appropriate, and will provide flexibility to respond to the challenging housing market and local economy. The HBF does not support a phased approach and considers it contrary to the NPPF. The NPPG is clear that previous delivery rates should not be a material factor in determining future supply and need and as such the challenging nature of the supply in parts of Blackpool simply serve to indicate that the Council should promote more viable sites earlier in the plan period. A brake upon the requirement early in the plan period will not only ensure a continuance of current affordability issues but may also slow economic recovery. The NPPG explains where constraints have been identified actions should be considered on what would be needed to overcome them, it does not advocate a phased approach to housing provision.

*'Actions can include the need for investment in new infrastructure, dealing with fragmented landownership, environmental improvement or a need to review development plan policy, which is currently constraining development'* (NPPG ID 3-022-20140306)

The NPPF also clearly indicates that development that is sustainable should 'go ahead without delay' (ministerial foreword, paragraphs 14 and 15).

The SHLAA also identifies a 30% buffer of sites to account for any under-delivery, therefore the Council already has a mechanism to deal with slower delivery due to the challenging nature of the Blackpool housing market. The only reason the HBF can identify for the stepped housing requirement is to

enable the Council to reduce its five year housing supply requirement in the short-term. Figure 10 of the *Housing Technical Paper* indicates that the Council has a 5.08 years supply with the lower housing requirement of 250dpa in the early years of the plan. With a flat rate throughout the plan period the Council would not be able to demonstrate a five year supply of sites as required by the NPPF paragraph 47. This is not justification for reducing the housing requirement early in the plan.

It should also be noted that the HBF does not agree with the Council's calculation of its five year supply even with the stepped approach as the calculation takes no account of demolitions. It also spreads the under-supply against the plan requirement across the full plan period. This latter issue is clearly contrary to the NPPG which states;

*'Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the 'Duty to Cooperate' (ID 3-035-20140306)*

The Council has stated that it is not requesting that neighbouring authorities assist with its housing supply and therefore any shortfalls should be met within the first five years. This NPPG position is supported by the vast majority of appeal decisions on planning applications.

The HBF recommends the deletion of the phased housing requirement and suggests that any under-supply be dealt with in the first five years of the plan.

### **Policy CS10: Sustainable Design and Renewable and Low Carbon Energy**

The policy is unsound as it is contrary to 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 upon energy. The recent ministerial statement by Stephen Williams MP (13<sup>th</sup> March 2014) clearly identified the desire of Government to reduce local standards. With regards to energy it is clear that it is the Government's intention to seek a Building Regulations only approach. The HBF understands that compliance with the Building Regulations will be through a fabric first approach followed by 'Allowable Solutions'. The chosen 'Allowable Solution' will be at the discretion of the developer and not the Council. The Council will, therefore, be unable to implement Part 1c of the policy.

### **Policy CS13: Housing Mix, Density and Standards**

The policy is considered unsound as it will not be effective and is not justified.

The policy seeks to apply a mix of house sizes and types to all developments greater than 1 hectare. Whilst the HBF supports mixed communities and a housing mix the current policy lacks sufficient flexibility to enable developers to

respond to changing market and site conditions. This could have the impact of stalling development or slowing the rate of development as the size of the market available to the developer is effectively restricted by the policy.

Part 2 of the policy suggests that standards will be put in place for new build development. Paragraph 6.24 of the plan provides greater clarification by stating that;

*'...new housing will be required to meet the local standards produced for conversions and new build developments. These will be based on relevant national standards and guidance where appropriate, including the Code for Sustainable Homes, Building for Life and Lifetime Homes standards....'*

The paragraph is unclear indicating that the standards will be locally derived but based upon relevant national standards. The HBF has two major concerns with this element of Policy CS13. Firstly because the Council has not set out its standards within the plan, as required by paragraph 174 of the NPPF, it is unclear what the costs and implications upon site viability will be. However given the challenging housing market in Blackpool it is likely that they will have a profound effect upon viability.

Secondly the setting of local standards is contrary to the Government's stated position of reducing local standards. Whilst accessibility may have optional national standards over and above the Building Regulations these need to be justified within a Local Plan. The HBF is unaware of any evidence provided by the Council to justify why it should introduce further standards.

To ensure the policy is sound it is recommended that part 1 of the policy provide greater flexibility and part 2, and its associated text, be deleted in its entirety.

### **Policy CS14: Affordable Housing**

The policy is unsound as it is not consistent with national policy or justified by the evidence.

The policy identifies that affordable housing contributions will be required from all schemes above a threshold of 3 or more units across the area with the exception of the defined inner area. The HBF is supportive of the exemption of the inner area from affordable housing contributions due to the inherent viability implications within this area. Whilst the HBF supports the provision of affordable housing there are two principal concerns with Policy CS14. These are considered separately below.

#### **Thresholds**

The threshold for schemes of 3 units or more to contribute towards affordable housing is out of step with emerging national policy on affordable housing thresholds. The Government has recently undertaken a consultation on 'planning performance and planning contributions' (March 2014). This consultation considers the introduction of a 10 unit threshold for affordable housing contributions. The aim of the threshold is to seek to address the

disproportionate burden placed on small scale developers which prevents the delivery of small scale housing sites. Further announcements were made on this issue within the Queens Speech which provides a clear indication that the Government intends to introduce a 10 unit threshold. The threshold of 3 or more units being required to make contributions is therefore contrary to the Government's stated direction of travel. The Council should consider amending the policy in light of these recent announcements.

### **Targets**

The policy requires all sites of 15 or more units to provide 30% affordable housing on site, sites between 3 and 14 units will be required to make a financial contribution. The HBF considers the level of affordable housing to be too high and as such it will have negative impacts upon scheme viability within large parts of Blackpool. This is identified in table 10.2 of the 2014 *Viability Study report*. The viability report tested 16 site typologies across Blackpool against a range of plan requirements. Table 10.2 identifies the full cumulative impact of all policies as required by paragraph 173 to 177 of the NPPF. The testing illustrates that of the 16 sites tested, half were unviable and one was marginal. Even when sites within the inner area are removed 45% of sites (5 out of the remaining 11) remain unviable or marginal. This is a significant proportion of sites indicating that a 30% affordable housing requirement is too large across much of Blackpool.

It is noted that the policy does indicate the Council are willing to negotiate when viability is threatened by the policy requirements. The HBF supports such a stance but this should only be applicable to a handful of sites. It should not be used to justify an unsustainable policy.

It is recommended that the Council either 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.

### **Information**

I would be pleased if I could be informed of the following;

- Submission of the DPD for examination,
- receipt of the inspectors report, and
- if and when the Council intends to adopt the DPD.

I would be happy to discuss any comments made within this representation with the Council prior to submission of the document to the Secretary of State.

Yours sincerely,



**Matthew Good**  
**Planning Manager – Local Plans**

Email: [matthew.good@hbf.co.uk](mailto:matthew.good@hbf.co.uk)

Tel: 07972774229

**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	Mr	
First Name	Nick	
Last Name	Sandford	
Job Title	Government Affairs Officer	
Organisation	Woodland Trust	
Address	Kempton Way	
	Dysart Road	
	Grantham	
	Lincs	
Postcode	NG31 6LL	
Telephone	08452 935 564	
Email	nicksandford@woodlandtrust.org.uk	

**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)



**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 checked="" 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.

The policy is not compliant with the NPPF as it does not explicitly give strong protection to ancient woodland and ancient/veteran trees

NPPF Paragraph 118 bullet 5,  
planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland.....

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.

Add the following wording to CS6 1. a.

In particular development which would have an adverse impact on irreplaceable habitats such as ancient woodland and ancient/veteran trees will not be permitted.

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



**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 checked="" 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.

We consider the strategy to be unsound in that it is not justified because it does not recognise evidence which suggests a need for creation of new woodland as part of green infrastructure in the district.

The Woodland Trust has developed an Access to Woodland Standard (which is designed to be complementary to the Natural England Access to Natural Greenspace Standard mentioned in paragraph 5.103.

Our Access to Woodland Standard aspires that everyone should have access to a small wood of at least 2 hectares in size within 500 metres of their home.

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.

Continued from above.....

Our Access standard shows that only 1.9% of residents in Blackpool have access to a small wood within 500 metres of their home. The figures can be found in our Space for People report which is in the publications section of the Woodland Trust website at <http://www.woodlandtrust.org.uk/learn/publications/general-publications/publications>.

We would therefore like to see this shortage of woodland in Blackpool recognised in the Core Strategy and some targets set for woodland creation to redress the shortfall.

Continue on a separate sheet/expand box if necessary

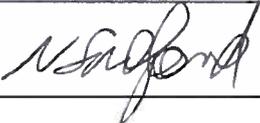
**Please ensure you sign the declaration at the end of the Form**

**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

## PART D: Examination in Public

<b>11. Do you wish to express an interest to participate in the Examination?</b>	
Yes, I wish to participate at the oral Examination	<input type="checkbox"/>
No, I do not wish to participate at the oral Examination	<input checked="" type="checkbox"/>
If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary. Only where a modification is sought to the Core Strategy is there a right for the representation to be heard at an Examination hearing session. Please note that the Inspector, not the Council, will decide who should be invited to speak at the Hearing sessions and also which topics are to be covered at them.	
Continue on a separate sheet/expand box if necessary	

<b>Declaration</b>	
I understand that all representations submitted will be made available for public inspection and will be identifiable to my name and organisation (if applicable).	
Signature: 	Date: 29/8/14

Date: 29 August 2014  
 Our ref: 125331



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

**BY EMAIL ONLY**

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T 0300 060 3900

Dear Sir/Madam

**Planning consultation: Blackpool Core Strategy – Proposed Submission**

Thank you for your consultation on the above which was received by Natural England on 04 July 2014.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We recognise that as a Publication Draft consultation responses to the plan should be made in the context of the 'tests of soundness' under the provisions of the Planning and Compulsory Purchase Act 2004 (as amended).

**Soundness and legal compliance of the Plan**

Natural England is not able to advise that the Plan is sound or legally compliant at this time specifically because The HRA states that, *"A parcel of land to the South of Blackpool has been identified for the development of a Neighbourhood Plan, which could lead to development within this area. However, impacts of this plan on the Natura 2000 sites will be assessed on production of the Neighbourhood Plan rather than through the Core Strategy"*

While we would expect the preparation of a neighbourhood plan to include consideration of its likely effects on the natural environment, including designated sites; in light of its proximity to European sites and the planning complexities in south Blackpool arising from range of consented and planned development, including that proposed at Whyndyke Farm and within the neighbourhood plan area, we would strongly advise that the council, as the competent authority under the Habitat Regulations, assesses the likely effects of all proposed development in this area to ensure it can be accommodated without resulting in significant adverse effects on European sites.

Where a Neighbourhood Plan could potentially lead to significant environmental effects it will be necessary to screen the Plan in relation to the Habitats and Species Regulations (as amended) 2010, (the 'Habitats Regulations') and the Environment Assessment of Plans and Programmes Regulations 2004. One of the basic conditions that will be tested at Examination is whether the making of the plan is compatible with European obligations and this includes requirements relating to the Habitats Directive and SEA Directive.

In relation to the Habitats Regulations, a Neighbourhood Plan cannot progress if the likelihood of significant effects on any European Site, either alone (or in combination with other plans and projects) cannot be ruled out (see Schedule 2, The Neighbourhood Planning (General) Regulations

2012). Therefore measures may need to be incorporated into the Neighbourhood Plan to ensure that any likely significant effects are avoided in order to secure compliance with the Regulation. A screening exercise should be undertaken if there is any doubt about the possible effects of the Plan on European protected sites. This will be particularly important if a Neighbourhood Plan is to progress before a Local Plan has been adopted and/or the Neighbourhood Plan proposes development which has not been assessed and/or included in the Habitats Regulations Assessment for the Local Plan.

## Development

Natural England also has some specific comments relating to the Habitats Regulations Assessment (HRA) conclusions. The HRA considered that likely significant impacts could occur in relation to four Natura 2000 sites (these include Morecambe Bay SPA/Ramsar and Ribble and Alt Estuaries SPA/Ramsar), due to potential disturbance of Annex 1 bird foraging sites which are situated adjacent to proposed residential and employment development areas to the south of Blackpool and at Whyndyke Farm (South of Mythop Road).

We accept the HRA findings that direct effects on the SPA can be ruled out and therefore advise that the further assessment should focus on the issue of recreational disturbance to species such as pink footed geese, Bewick's swan and whooper swan and on the mitigation measures that will be put in place and how these will be secured through development.

Local Natural England advisers have confirmed that the fields around Wyndyke Farm are important for foraging birds and are also a popular area for recreational access, we would therefore expect future recreation pressures will largely arise from this development and that within south Blackpool. With this in mind, we suggest a site specific policy for Wyndyke and other relevant allocations in this part of Blackpool would be the most effective way of guiding development in this part of the Plan area.

A site specific policy could usefully link to and add detail to Policy CS6 Green Infrastructure (point 4) which now reads:

*International, national and local sites of biological and geological conservation importance will be protected having regard to the hierarchy of designated sites and the potential for appropriate mitigation. **Measures** that seek to preserve, restore and enhance local ecological networks and priority habitats/species will be required where necessary.*

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 be sought from new development in this area.

Please note, Natural England would like assurance the likely effects on European sites can be minimised to an acceptable level by the inclusion of further and more detailed policy guidance. We would therefore welcome the opportunity to discuss our concerns about the HRA with the council at the earliest opportunity.

## Sustainability Appraisal

Natural England agrees with the conclusions reached in the SA. The SA clearly outlines both negative and uncertain impacts. We note there are some unresolved uncertainties in the SA. These negative and uncertain effects should be explored further as avoidance and/or mitigation measures may be required in order to reduce harm to the environment.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Kate Wheeler on 07769 918711. For any new consultations, or to provide further information on this consultation

please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully

Kate Wheeler  
Cheshire, Greater Manchester, Merseyside and Lancashire Area





## Comment

<b>Consultee</b>	Mr David Dunlop (855963)
<b>Email Address</b>	ddunlop@lancswt.org.uk
<b>Company / Organisation</b>	The Wildlife Trust for Lancashire, Manchester & North Merseyside
<b>Address</b>	The Wildlife Trust The Barn PRESTON PR5 6BY
<b>Event Name</b>	Core Strategy Proposed Submission
<b>Comment by</b>	The Wildlife Trust for Lancashire, Manchester & North Merseyside (Mr David Dunlop)
<b>Comment ID</b>	CSPS2
<b>Response Date</b>	29/08/14 11:21
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

### 1. To which part of the Proposed Submission Core Strategy does this relate?

**Policy Reference(s):** Policy CS7: Quality of Design

**Section/Paragraph Number:** 2.

### 2. In respect of this part of the Plan, do you consider the Proposed Submission Core Strategy is:

**(a) Legally Compliant** Yes

**(b) Compliant with the Duty to Co-operate?** Yes

**(c) Sound** No

**6. In what respect do you consider this part of the Core Strategy is unsound?** . (iii) Not effective

**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, please complete a separate Part B sheet for each one.**

The list contains no reference to natural environment, biodiversity or ecological networks, to reflect the text at 5.113.

**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.**

Add reference to natural environment, biodiversity and ecological networks to the list to reflect the text at 5.113.

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

It does not appear to break any laws, as far as I'm aware.

**Do you have any other comments** No

**Do you have any comments to make on the Sustainability Appraisal?** No

**10. Do you wish to express an interest to participate in the Examination?** . No, I do not wish to participate at the Oral Examination

**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

**Publication of the recommendations of the person appointed to** . Yes

**carry out an independent examination of the Core Strategy** . Yes

**Adoption of the Core Strategy** . Yes

**Declaration**

**Name** David Dunlop

**Date (dd/mm/yyyy)** 29/08/2014

## Comment

<b>Consultee</b>	Mr David Dunlop (855963)
<b>Email Address</b>	ddunlop@lancswt.org.uk
<b>Company / Organisation</b>	The Wildlife Trust for Lancashire, Manchester & North Merseyside
<b>Address</b>	The Wildlife Trust The Barn PRESTON PR5 6BY
<b>Event Name</b>	Core Strategy Proposed Submission
<b>Comment by</b>	The Wildlife Trust for Lancashire, Manchester & North Merseyside (Mr David Dunlop)
<b>Comment ID</b>	CSPS3
<b>Response Date</b>	29/08/14 11:23
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**1. To which part of the Proposed Submission Core Strategy does this relate?**

**Policy Reference(s):** 5

**Section/Paragraph Number:** 112

**2. In respect of this part of the Plan, do you consider the Proposed Submission Core Strategy is:**

**(a) Legally Compliant** Yes

**(b) Compliant with the Duty to Co-operate?** Yes

**(c) Sound** Yes

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

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

Paragraph 112 appears to us to be compliant with the requirements of the Government's Natural Environment White Paper and, specifically, with those of the National Planning Policy Framework (NPPF) relating to ecological networks.

NPPF states that:

- . Local authorities should set criteria based policies for designated sites that make distinctions between hierarchy of sites. Locally designated sites are recognised within this hierarchy and the glossary clearly makes the link to Local Wildlife Sites as a locally designated site. It goes on to state that this distinction is so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks? (reference is also made to circular 06/2005) (paragraph 113).
- . Local authorities should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure..? (Paragraph 114)
- . Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries?, identify and map components of the local ecological network (including locally designated sites and therefore Local Wildlife Sites), wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation?. (paragraph 117)
- . Policies should also promote the preservation, restoration and re-creation of priority habitats, ecological networks and protection and recovery of priority species populations? linked to targets in the plan. (paragraph 117)

**Do you have any other comments** Yes

**Do you have any comments to make on the Sustainability Appraisal?** No

**10. Do you wish to express an interest to participate in the Examination?** No, I do not wish to participate at the Oral Examination

### 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

**Publication of the recommendations of the person appointed to** Yes

**carry out an independent examination of the Core Strategy**

**Adoption of the Core Strategy** Yes

### Declaration

**Name** David Dunlop

**Date (dd/mm/yyyy)** 28/08/2014

## Comment

<b>Consultee</b>	Mr David Dunlop (855963)
<b>Email Address</b>	ddunlop@lancswt.org.uk
<b>Company / Organisation</b>	The Wildlife Trust for Lancashire, Manchester & North Merseyside
<b>Address</b>	The Wildlife Trust The Barn PRESTON PR5 6BY
<b>Event Name</b>	Core Strategy Proposed Submission
<b>Comment by</b>	The Wildlife Trust for Lancashire, Manchester & North Merseyside (Mr David Dunlop)
<b>Comment ID</b>	CSPS4
<b>Response Date</b>	29/08/14 11:25
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**1. To which part of the Proposed Submission Core Strategy does this relate?**

**Policy Reference(s):** Policy CS7: Quality of Design

**Section/Paragraph Number:** 1.

**2. In respect of this part of the Plan, do you consider the Proposed Submission Core Strategy is:**

**(a) Legally Compliant** Yes

**(b) Compliant with the Duty to Co-operate?** Yes

**(c) Sound** No

**6. In what respect do you consider this part of the Core Strategy is unsound?** . (iii) Not effective

**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, please complete a separate Part B sheet for each one.**

The list contains no reference to the natural environment, biodiversity or ecological networks to reflect the text at 5.113.

**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.**

Add the natural environment, biodiversity and ecological networks to the list.

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

So far as I know, this omission breaks no laws.

**10. Do you wish to express an interest to participate in the Examination?**

**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

**Publication of the recommendations of the person appointed to** . Yes

**carry out an independent examination of the Core Strategy** . Yes

**Adoption of the Core Strategy** . Yes

**Declaration**

**Name** David Dunlop

**Date (dd/mm/yyyy)** 29/08/2014



## Comment

<b>Agent</b>	Mr Alun Davies (855348)
<b>Email Address</b>	fyoung@nlpplanning.com
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<b>Address</b>	3rd Floor 1 St James's Square Manchester M2 6DN
<b>Consultee</b>	(855349)
<b>Company / Organisation</b>	Bourne Leisure Ltd
<b>Address</b>	c/o Agent c/o Agent c/o agent
<b>Event Name</b>	Core Strategy Proposed Submission
<b>Comment by</b>	Bourne Leisure Ltd ( )
<b>Comment ID</b>	CSPS5
<b>Response Date</b>	29/08/14 13:03
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Section/Paragraph Number:</b>	Chapter 2: A Spatial Portrait of Blackpool
<b>2. In respect of this part of the Plan, do you consider the Proposed Submission Core Strategy is:</b>	
<b>(a) Legally Compliant</b>	Yes
<b>(b) Compliant with the Duty to Co-operate?</b>	Yes
<b>(c) Sound</b>	No
<b>6. In what respect do you consider this part of the Core Strategy is unsound?</b>	. (iv) Not consistent with national policy

**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, please complete a separate Part B sheet for each one.**

Bourne Leisure notes that paragraphs 2.5 and 2.12 recognise that there has been a significant decline in the visitor numbers in Blackpool since the 1980's, resulting in an underperforming economy. Paragraph 2.14 then recognises that in recent years Blackpool is beginning to revitalise its visitor economy as a result of significant new public sector investment and an improved resort offer, although it is acknowledged that Blackpool still has a way to go to provide a high quality resort offer. The Company therefore considers that the strongest possible and in principle support should be given throughout the emerging Core Strategy to the enhancement of existing tourism accommodation and facilities in order to comply with the National Planning Policy Framework's objectives of economic growth and sustainable development.

**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.**

***Proposed modification***

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, in order to assist in the continued revitalisation of the visitor economy.

**Do you have any other comments** . No

**Do you have any comments to make on the Sustainability Appraisal?** . No

**10. Do you wish to express an interest to participate in the Examination?** . No, I do not wish to participate at the Oral Examination

**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

**Publication of the recommendations of the person appointed to** . Yes

**carry out an independent examination of the Core Strategy** . Yes

**Adoption of the Core Strategy** . Yes

**Declaration**

**Name**

Margaret Baddeley

**Date (dd/mm/yyyy)**

29/08/14

## Comment

<b>Agent</b>	Mr Alun Davies (855348)
<b>Email Address</b>	fyoung@nlppanning.com
<b>Company / Organisation</b>	Nathaniel Lichfield & Partners
<b>Address</b>	3rd Floor 1 St James's Square Manchester M2 6DN
<b>Consultee</b>	(855349)
<b>Company / Organisation</b>	Bourne Leisure Ltd
<b>Address</b>	c/o Agent c/o Agent c/o agent
<b>Event Name</b>	Core Strategy Proposed Submission
<b>Comment by</b>	Bourne Leisure Ltd ( )
<b>Comment ID</b>	CSPS6
<b>Response Date</b>	29/08/14 13:04
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Section/Paragraph Number:</b>	Chapter 2: Vision and Objectives: The Spatial Vision
<b>2. In respect of this part of the Plan, do you consider the Proposed Submission Core Strategy is:</b>	
<b>(a) Legally Compliant</b>	Yes
<b>(b) Compliant with the Duty to Co-operate?</b>	Yes
<b>(c) Sound</b>	No
<b>6. In what respect do you consider this part of the Core Strategy is unsound?</b>	(iv) Not consistent with national policy

**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, please complete a separate Part B sheet for each one.**

Bourne Leisure supports the Spatial Vision for Blackpool which recognises that by 2027 Blackpool would have built upon its status as Britain's favourite seaside resort to become renowned for its quality and innovation of its culture, entertainment and business tourism offer. The Company also supports the emphasis in the Vision on a year round tourism offer. However, in order that Blackpool develops a strong economic role in accord with paragraph 7 of the NPPF and the presumption in favour of sustainable development in paragraph 14 of the NPPF, Bourne Leisure considers that greater support and recognition should be given to Blackpool as the main tourism centre for the Flyde 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.

**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.**

***Proposed modification***

The suggested amendments are shown in **bold** below:

*?In 2027 Blackpool has built upon its status as Britain's favourite seaside resort, **and the main tourism centre for the Flyde Coast**, to become renowned for the quality and innovation of its culture, entertainment and business tourism offer? .*

The Spatial Vision continues and should be revised to state that:

*?The resort, **and the leisure and tourism attractions and facilities that support it** , offer a high quality visitor experience attracting new audiences and creating new reasons to visit Blackpool year-round?.*

**Do you have any other comments**  No

**Do you have any comments to make on the Sustainability Appraisal?**  No

**10. Do you wish to express an interest to participate in the Examination?**  No, I do not wish to participate at the Oral Examination

**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

**Publication of the recommendations of the person appointed to** . Yes

**carry out an independent examination of the Core Strategy** . Yes

**Adoption of the Core Strategy** . Yes

**Declaration**

**Name** Margaret Baddeley

**Date (dd/mm/yyyy)** 29/08/2014

## Comment

<b>Agent</b>	Mr Alun Davies (855348)
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<b>Consultee</b>	(855349)
<b>Company / Organisation</b>	Bourne Leisure Ltd
<b>Address</b>	c/o Agent c/o Agent c/o agent
<b>Event Name</b>	Core Strategy Proposed Submission
<b>Comment by</b>	Bourne Leisure Ltd ( )
<b>Comment ID</b>	CSPS7
<b>Response Date</b>	29/08/14 13:04
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Section/Paragraph Number:</b>	Chapter 3: Spatial Vision and Objectives: Objectives
<b>2. In respect of this part of the Plan, do you consider the Proposed Submission Core Strategy is:</b>	
<b>(a) Legally Compliant</b>	Yes
<b>(b) Compliant with the Duty to Co-operate?</b>	Yes
<b>(c) Sound</b>	No
<b>6. In what respect do you consider this part of the Core Strategy is unsound?</b>	(iv) Not consistent with national policy

**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, please complete a separate Part B sheet for each one.**

Bourne Leisure supports spatial objective 14 of Goal 3- Regeneration of the town centre, resort core and inner areas to address economic, social and physical decline, which aims to:

*?Sustain a high quality, year-round visitor offer by growing and promoting our tourism, arts, heritage and cultural offer including new high quality attractions, accommodation and conferencing facilities and an exciting programme of national events and festivals? .*

However, the Company considers that it is equally, if not more, important for planning policy to support in principle the enhancement of existing tourism accommodation and facilities (e.g. at holiday parks), as well as promoting new facilities, both within and outside the resort core to help to sustain a high quality visitor offer.

Such an approach would reflect paragraph 28 of the National Planning Policy Framework (NPPF), which supports, *??sustainable rural tourism and leisure developments? and ??the provision and expansion of tourist and visitor facilities in appropriate locations?.*

**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.**

***Proposed Modification***

Bourne Leisure considers that objective 14 should be amended to state:

*?Sustain a high quality, year-round visitor offer by growing and promoting our tourism, arts, heritage and cultural offer including **supporting existing tourism accommodation and facilities both within and outside the resort core, and providing** new high quality attractions, accommodation and conferencing facilities and an exciting programme of national events and festivals? (our additions in bold) .*

**Do you have any other comments** No

**Do you have any comments to make on the Sustainability Appraisal?** No

**10. Do you wish to express an interest to participate in the Examination?** No, I do not wish to participate at the Oral Examination

**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

**Publication of the recommendations of the person appointed to** . Yes

**carry out an independent examination of the Core Strategy** . Yes

**Adoption of the Core Strategy** . Yes

**Declaration**

**Name** Margaret Baddeley

**Date (dd/mm/yyyy)** 29/08/2014

## Comment

<b>Agent</b>	Mr Alun Davies (855348)
<b>Email Address</b>	fyoung@nlppanning.com
<b>Company / Organisation</b>	Nathaniel Lichfield & Partners
<b>Address</b>	3rd Floor 1 St James's Square Manchester M2 6DN
<b>Consultee</b>	(855349)
<b>Company / Organisation</b>	Bourne Leisure Ltd
<b>Address</b>	c/o Agent c/o Agent c/o agent
<b>Event Name</b>	Core Strategy Proposed Submission
<b>Comment by</b>	Bourne Leisure Ltd ( )
<b>Comment ID</b>	CSPS8
<b>Response Date</b>	29/08/14 13:05
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Section/Paragraph Number:</b>	Chapter 4: Spatial Strategy - Key Diagram Figure 10

**2. In respect of this part of the Plan, do you consider the Proposed Submission Core Strategy is:**

**(a) Legally Compliant** Yes

**(b) Compliant with the Duty to Co-operate?** Yes

**(c) Sound** Yes

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

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

In the previous version of the Core Strategy the 'South Blackpool Growth and Enhancement Area' appeared to include at least part of the Marton Mere Holiday Village.

Bourne Leisure is pleased to note that Figure 10 has been amended and now excludes the Marton Mere Holiday Village from the Growth Area, which specifically relates to new housing and employment growth.

**Do you have any other comments** No

**Do you have any comments to make on the Sustainability Appraisal?** No

**10. Do you wish to express an interest to participate in the Examination?** . No, I do not wish to participate at the Oral Examination

**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

**Publication of the recommendations of the person appointed to** . Yes

**carry out an independent examination of the Core Strategy** . Yes

**Adoption of the Core Strategy** . Yes

**Declaration**

**Name** Margaret Baddeley

**Date (dd/mm/yyyy)** 29/08/2014

## Comment

<b>Agent</b>	Mr Alun Davies (855348)
<b>Email Address</b>	fyoung@nlppanning.com
<b>Company / Organisation</b>	Nathaniel Lichfield & Partners
<b>Address</b>	3rd Floor 1 St James's Square Manchester M2 6DN
<b>Consultee</b>	(855349)
<b>Company / Organisation</b>	Bourne Leisure Ltd
<b>Address</b>	c/o Agent c/o Agent c/o agent
<b>Event Name</b>	Core Strategy Proposed Submission
<b>Comment by</b>	Bourne Leisure Ltd ( )
<b>Comment ID</b>	CSPS9
<b>Response Date</b>	29/08/14 13:06
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**1. To which part of the Proposed Submission Core Strategy does this relate?**

**Policy Reference(s):** Policy CS1: Strategic Location of Development

**Section/Paragraph Number:** Strategic Location of Development:

**2. In respect of this part of the Plan, do you consider the Proposed Submission Core Strategy is:**

**(a) Legally Compliant** Yes

**(b) Compliant with the Duty to Co-operate?** Yes

**(c) Sound** No

6. In what respect do you consider this part of the Core Strategy is unsound? . (i) Not positively prepared  
 . (iv) Not consistent with national policy

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, please complete a separate Part B sheet for each one.

Bourne Leisure objects to Policy CS1: Strategic Location of Development which promotes Blackpool's future growth, development and investment within the inner area regeneration, which includes Blackpool Town Centre, the Resort Core and neighbourhoods within the inner area, as the Company considers that the Core Strategy's spatial policies should also recognise the importance of the tourism offer outside the Resort Core in terms of the very significant contribution of these other areas to the Borough's tourism profile and to the local economy.

Bourne Leisure also objects to the wording of the supporting text at paragraph 4.7 which states that *'the Resort Core must be a focus for future tourism and leisure development and investment'* in order to *'support a sustainable visitor economy'*, as again the Company considers that the enhancement and expansion of tourism accommodation and facilities elsewhere should be encouraged. This greater support for tourism would be in accord with NPPF's policies to support sustainable development and economic growth.

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.

***Proposed Modification***

In order to recognise the importance of tourism outside the Resort Area, Policy CS1 should be amended to add an additional paragraph 4 which states:

*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.*

Do you have any other comments No

Do you have any comments to make on the Sustainability Appraisal? No

10. Do you wish to express an interest to participate in the Examination? . No, I do not wish to participate at the Oral Examination

**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

**Publication of the recommendations of the person appointed to** . Yes

**carry out an independent examination of the Core Strategy** . Yes

**Adoption of the Core Strategy** . Yes

**Declaration**

**Name** Margaret Baddeley

**Date (dd/mm/yyyy)** 29/08/14

## Comment

<b>Agent</b>	Mr Alun Davies (855348)
<b>Email Address</b>	fyoung@nlppanning.com
<b>Company / Organisation</b>	Nathaniel Lichfield & Partners
<b>Address</b>	3rd Floor 1 St James's Square Manchester M2 6DN
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<b>Company / Organisation</b>	Bourne Leisure Ltd
<b>Address</b>	c/o Agent c/o Agent c/o agent
<b>Event Name</b>	Core Strategy Proposed Submission
<b>Comment by</b>	Bourne Leisure Ltd ( )
<b>Comment ID</b>	CSPS10
<b>Response Date</b>	29/08/14 13:06
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**1. To which part of the Proposed Submission Core Strategy does this relate?**

**Policy Reference(s):** Policy CS5 Connectivity

**Section/Paragraph Number:** Chapter 5: Core Policies

**2. In respect of this part of the Plan, do you consider the Proposed Submission Core Strategy is:**

**(a) Legally Compliant** Yes

**(b) Compliant with the Duty to Co-operate?** Yes

**(c) Sound** No

**6. In what respect do you consider this part of the Core Strategy is unsound?** . (iv) Not consistent with national policy

**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, please complete a separate Part B sheet for each one.**

Bourne Leisure supports paragraph 5.60 which promotes fast, convenient access to the resort and high quality infrastructure and an efficient network within the town in order to encourage visitors. However, whilst Bourne Leisure endorses the Council's overall objective of improving connectivity and reducing car travel, the Company considers 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, including holiday parks and villages, in more remote and/ or rural areas.

The importance of and the role that tourism plays, particularly in these areas, is recognised in both the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG).

In this context, paragraph 28 of the NPPF states that local and neighbourhood plans should:

*?support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres.?*

In addition, the PPG (March 2014) states that local planning authorities should consider the following when planning for tourism:

- . *?consider the specific needs of the tourist industry, including particular locational or operational requirements;*
- . *examine the broader social, economic and environmental impacts of tourism; and*
- . *have regard to non-planning guidance produced by other Government Departments.?*

**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.**

***Proposed Modification***

Additional text should be added in relation to point 8 of Policy CS5: Connectivity (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.

**Do you have any other comments** No

**Do you have any comments to make on the Sustainability Appraisal?** No

**10. Do you wish to express an interest to participate in the Examination?** . No, I do not wish to participate at the Oral Examination

**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

**Publication of the recommendations of the person appointed to** . Yes

**carry out an independent examination of the Core Strategy** . Yes

**Adoption of the Core Strategy** . Yes

**Declaration**

**Name** Margaret Baddeley

**Date (dd/mm/yyyy)** 29/08/2014

## Comment

<b>Agent</b>	Mr Alun Davies (855348)
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<b>Company / Organisation</b>	Bourne Leisure Ltd
<b>Address</b>	c/o Agent c/o Agent c/o agent
<b>Event Name</b>	Core Strategy Proposed Submission
<b>Comment by</b>	Bourne Leisure Ltd ( )
<b>Comment ID</b>	CSPS11
<b>Response Date</b>	29/08/14 13:07
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**1. To which part of the Proposed Submission Core Strategy does this relate?**

**Policy Reference(s):** Policy CS6: Green Infrastructure

**Section/Paragraph Number:** Chapter 5: Core Policies

**2. In respect of this part of the Plan, do you consider the Proposed Submission Core Strategy is:**

**(a) Legally Compliant** Yes

**(b) Compliant with the Duty to Co-operate?** Yes

**(c) Sound** No

6. In what respect do you consider this part of the Core Strategy is unsound? . (iv) Not consistent with national policy

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, please complete a separate Part B sheet for each one.

Whilst Bourne Leisure supports the general principle of Policy CS6: *Green Infrastructure* to support high quality and well-connected networks of green infrastructure, the Company considers that 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, such as promoting tourism, with environmental matters (for example, the protection and scope for enhancement of sites of nature conservation value or landscape value). Moreover, and in particular in relation to paragraph 3 of Policy CS6, 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 National Planning Policy Framework, which identifies the need to distinguish between the hierarchy of international, national and locally designated sites, ?? so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks ?.

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.

**Proposed Modification**

The supporting text in the emerging Core Strategy should recognise that there is scope for appropriate development in areas adjacent to designated sites, such as local nature reserves, provided that commensurate mitigation measures, such as the inclusion of a buffer zone and appropriate landscaping, are implemented in order to minimise both direct and indirect impacts. Moreover, it should be fully recognised in Policy CS6 and its 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.

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

Do you have any other comments No

Do you have any comments to make on the Sustainability Appraisal? No

10. Do you wish to express an interest to participate in the Examination? . No, I do not wish to participate at the Oral Examination

**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

**Publication of the recommendations of the person appointed to** . Yes

**carry out an independent examination of the Core Strategy** . Yes

**Adoption of the Core Strategy** . Yes

**Declaration**

**Name** Margaret Baddeley

**Date (dd/mm/yyyy)** 29/08/2014

## Comment

<b>Agent</b>	Mr Alun Davies (855348)
<b>Email Address</b>	fyoung@nlplanning.com
<b>Company / Organisation</b>	Nathaniel Lichfield & Partners
<b>Address</b>	3rd Floor 1 St James's Square Manchester M2 6DN
<b>Consultee</b>	(855349)
<b>Company / Organisation</b>	Bourne Leisure Ltd
<b>Address</b>	c/o Agent c/o Agent c/o agent
<b>Event Name</b>	Core Strategy Proposed Submission
<b>Comment by</b>	Bourne Leisure Ltd ( )
<b>Comment ID</b>	CSPS12
<b>Response Date</b>	29/08/14 13:07
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>1. To which part of the Proposed Submission Core Strategy does this relate?</b>	
<b>Policy Reference(s):</b>	Policy CS21
<b>Section/Paragraph Number:</b>	Chapter 7: Regenerating Blackpool Town Centre and Resort Core
<b>2. In respect of this part of the Plan, do you consider the Proposed Submission Core Strategy is:</b>	
<b>(a) Legally Compliant</b>	Yes
<b>(b) Compliant with the Duty to Co-operate?</b>	Yes
<b>(c) Sound</b>	No

**6. In what respect do you consider this part of the Core Strategy is unsound?** . (i) Not positively prepared  
 . (iv) Not consistent with national policy

**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, please complete a separate Part B sheet for each one.**

Bourne Leisure objects to the emphasis in Policy CS21 and its supporting text for proposals for new high quality tourism attractions and new visitor accommodation to be focussed on the town centre, resort core and defined holiday accommodation areas. The Company also objects to paragraph 7.32, which states that the resort core remains the general focus for holiday accommodation. Bourne Leisure considers that the support for tourism as set out in Policy CS21, 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.

Bourne Leisure welcomes the reference at paragraph 7.35 of the supporting text to Policy CS21 which states:

*? Away from the Resort Core, leisure development opportunities should focus on the enhancement of existing facilities which largely meet outdoor leisure and recreation need, including Blackpool Zoo, Stanley Park and  Marton Mere Holiday Village  . These provide important leisure facilities for quieter enjoyment which are different to the Resort Core, but complimentary to Blackpool's leisure and tourism offer as a whole.?*

Notwithstanding the above, Bourne Leisure considers that emerging Core Strategy policies for tourism-based regeneration within the resort and town centre should be clearly placed within wider development plan policies promoting tourism-related development for the Borough as a whole. 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.

Bourne Leisure therefore considers that a new, specific policy for promoting the enhancement of existing holiday parks should be introduced.

The introduction of such a policy would respond to an issue identified at bullet point 3, page 10 of the 2009 Fylde Coast Visitor Accommodation Study, which states that:

*? There is 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. We therefore suggest that policy is amended to allow for the introduction of higher quality lodge units in appropriate locations.?*

Moreover, paragraph 45 (un-numbered), on page 83 of the 2009 Fylde Coast Visitor Accommodation Study, notes that, *? there is a need to reinvest in existing sites ?* and it goes on to confirm that *?, the larger sites such as Marton Mere (Haven)..have indeed reinvested in recent years- with occupancy increasing as a result ?.*

**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.

***Proposed Modification***

**New policy**

The following wording is proposed:

*The Council will:*

- 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*
- 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.*

**Do you have any other comments** . No

**Do you have any comments to make on the Sustainability Appraisal?** . No

**10. Do you wish to express an interest to participate in the Examination?** . No, I do not wish to participate at the Oral Examination

**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

**Publication of the recommendations of the person appointed to** . Yes

**carry out an independent examination of the Core Strategy** . Yes

**Adoption of the Core Strategy** . Yes

**Declaration**

**Name** Margaret Baddeley

**Date (dd/mm/yyyy)**

29/08/2014

## Comment

<b>Agent</b>	Mr Alun Davies (855348)
<b>Email Address</b>	fyoung@nlppanning.com
<b>Company / Organisation</b>	Nathaniel Lichfield & Partners
<b>Address</b>	3rd Floor 1 St James's Square Manchester M2 6DN
<b>Consultee</b>	(855349)
<b>Company / Organisation</b>	Bourne Leisure Ltd
<b>Address</b>	c/o Agent c/o Agent c/o agent
<b>Event Name</b>	Core Strategy Proposed Submission
<b>Comment by</b>	Bourne Leisure Ltd ( )
<b>Comment ID</b>	CSPS13
<b>Response Date</b>	29/08/14 13:08
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>1. To which part of the Proposed Submission Core Strategy does this relate?</b>	
<b>Policy Reference(s):</b>	Policy CS24
<b>Section/Paragraph Number:</b>	Chapter 8: Enabling South Blackpool Growth and Enhancement
<b>2. In respect of this part of the Plan, do you consider the Proposed Submission Core Strategy is:</b>	
<b>(a) Legally Compliant</b>	Yes
<b>(b) Compliant with the Duty to Co-operate?</b>	Yes
<b>(c) Sound</b>	Yes

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

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

Bourne Leisure notes that there is an allocation for employment uses on the Preston New Road site (Site 3 of Figure 18), where the Council will support, in principle, proposals for major new business/ industrial development to support sub-regional economic growth (Policy CS24). This site is directly adjacent to the Marton Mere Holiday Village. The Company therefore considers that 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. In this regard, Bourne Leisure would highlight that the ?ERNIE? building within the Preston New Road site has shared access with the Marton Mere Holiday Village and therefore any proposals for intensification of use on this site will need to provide adequate - and alternative - access arrangements, so that the current access to the Holiday Village is retained.

**Do you have any other comments** . No

**Do you have any comments to make on the Sustainability Appraisal?** . No

**10. Do you wish to express an interest to participate in the Examination?** . No, I do not wish to participate at the Oral Examination

**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

**Publication of the recommendations of the person appointed to** . Yes

**carry out an independent examination of the Core Strategy** . Yes

**Adoption of the Core Strategy** . Yes

**Declaration**

**Name** Margaret Baddeley

**Date (dd/mm/yyyy)** 29/08/2014

**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)
<b>Title</b>		Mr
<b>First Name</b>		Mike
<b>Last Name</b>		Hopkins
<b>Job Title</b>		Planning Consultant
<b>Organisation</b>	NS & I /Rowland Homes	JLL
<b>Address</b>	C/O Agent	One Piccadilly Gardens
		Manchester
<b>Postcode</b>		M1 1RG
<b>Telephone</b>		01612387411
<b>Email</b>		mike.hopkins@eu.jll.com

**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)

**For official use only**

Ref: CSPA /

## PART B: Core Strategy Representation

Please use a separate form for each representation

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

<b>Name:</b>	Mike Hopkins
<b>Organisation</b>	NS&I/Rowland Homes

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

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 checked="" 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.

It is agreed 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.

Blackpool has an unbalanced housing market characterised by an over supply 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.

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.

The Spatial Portrait should acknowledge that the effects of the demographic situation in Blackpool has led to high levels of deprivation, poor health, an ageing population and a decline in the resident workforce.

For the Spatial Portrait to be sound there needs to be a recognition that the housing market should be rebalanced to address the projected out migration of population. There should also be an acknowledgment that there is a lack of larger "aspirational" family dwellings to be developed.

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

**For official use only**

Ref: CSPA /

## PART B: Core Strategy Representation

Please use a separate form for each representation

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

<b>Name:</b>	Mike Hopkins
<b>Organisation</b>	NS&I/Rowland Homes

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

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 checked="" 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?**

The Vision for Blackpool is in general supported, however it is considered that the Vision should recognise the need for larger quality family dwellings to redress the housing in-balance in the Borough and to provide quality homes for the existing residents and to attract new households

Goal 4 should also refer to the need for quality housing to be provided and make reference to the need to have regard to design quality and sustainable principles.

Continue on a separate sheet/expand box if necessary

**For official use only**

Ref: CSPA /

## PART B: Core Strategy Representation

Please use a separate form for each representation

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

<b>Name:</b>	Mike Hopkins
<b>Organisation</b>	NS&I/Rowland Homes

1. To which part of the Proposed Submission Core Strategy does this representation relate?	
<b>Policy Reference</b>	CS1 - Strategic Location of Development
<b>Section/Paragraph Number</b>	
<b>Map Reference</b>	
<b>Appendix Number</b>	

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 checked="" 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.

Whilst the Spatial Strategy seeking the regeneration of Blackpool Town Centre is supported in order to meet the Spatial Vision for Blackpool and satisfy the Goals, there needs to be recognition that a wide choice of suitable sites for market housing and employment should be provided outside the SLD in order to re-balance the housing market and to assist in addressing the economic decline of the Borough.

There is an acknowledged lack of quality larger family housing in the Borough, which are required in order to redress the projected out- migration of population.

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.

Policy CS1 or the reasoned justification should recognise the need to provide larger "aspirational" family dwellings outside the SLD in order to assist in regeneration and redressing the housing in-balance.

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".

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

**For official use only**

Ref: CSPA /

## PART B: Core Strategy Representation

Please use a separate form for each representation

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

<b>Name:</b>	Mike Hopkins
<b>Organisation</b>	NS&I/Rowland Homes

1. To which part of the Proposed Submission Core Strategy does this representation relate?	
<b>Policy Reference</b>	CS2 - Housing Provision
<b>Section/Paragraph Number</b>	
<b>Map Reference</b>	
<b>Appendix Number</b>	

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 checked="" 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.

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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 checked="" 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.

See separate sheet

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.

See separate sheet

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

## **POLICY CS2 – Housing Provision**

7. In terms of housing provision the Local Plan needs to have regard to the 2012 based Sub National Population Projections (SNPP) which were published by the Office of National Statistics on 29th May 2014.

As required by the NPPF local planning authorities are required to keep Local Plans up to date and meet the objectively assessed housing and other needs. Planning Practice Guidance recommends that consideration be given to the most recent ONS projections as a starting point, which in this case is the May2014 SNPP.

It should be noted that some caution should be exercised in using these projections, as they are based upon a period of severe recession which has resulted in very limited growth.

The 2012 based SNPP suggest a lower population total for Blackpool than the 2011 based SNPP, this is likely to be due to net migration out of the Borough. Whilst the 2012 Sub National Household Projections (SNHP) will be available until the end of 2014, there is no correlation between population and household levels. In fact the 2011 based SNHP's were criticised as being too low. The Planning Practice Guidance states (paragraph 2a 016) that the 2011 based SNHP are limited in assessing need beyond 2021. The PPG makes it clear that the latest SNHP's are simply a starting point in assessing need.

It is vital that the Local Plan should fully recognise that the 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 to reverse the economic decline which Blackpool has been experiencing.

The effects of the demographic situation which exists in Blackpool, which has led to high levels of deprivation, poor health, an ageing population and a reduction in the working population. To reverse this decline and to satisfy the Core Strategy's Vision for Blackpool, significant intervention is required including the growth of its economic base, together with the delivery of quality houses in appropriate locations to meet the need and demands of the existing residents and to attract new households

8. 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 section housing across the Borough.

There should also be an acknowledgement in CS2 that if there is a significant and sustained under-delivery of housing against the Plan period target there should be a review of CS2.

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## PART B: Core Strategy Representation

Please use a separate form for each representation

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

<b>Name:</b>	Mike Hopkins
<b>Organisation</b>	NS&I/Rowland Homes

1. To which part of the Proposed Submission Core Strategy does this representation relate?	
<b>Policy Reference</b>	CS3 - Economic Development & Framework
<b>Section/Paragraph Number</b>	
<b>Map Reference</b>	
<b>Appendix Number</b>	

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 checked="" 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 checked="" 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.

See Separate sheet

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.

Policy CS3 should specifically state that "Where land 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".

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.

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

## **CS3 – Economic Development and Employment**

8. We object to the designation of the NS&I site at Mythop Road as a location for Economic Growth and Employment. We consider that the identified locations for business and industrial are out of date and fail to have regard to market demand and are therefore unsound.

The evidence base fails to take account of business churn. 13 main industrial/business locations are identified, however not all of these sites are in demand and some are not viable, not least of those is the NS&I site which is underused and unsuitable for modern commercial requirements. If the NS&I site was in demand then it would be coming forward or showing signs of activity.

We consider that the NS&I site should not be identified as an Employment Site in Figure 11 and Figure 18. It is requested that Policy CS3 should be amended to include recognition that employment and mixed use schemes will contribute to the local economy of Blackpool 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. Such a mixed use designation would be the most sustainable use for the site which will ensure the viability and deliverability of the employment lead mixed use.

Policy CS3 should fully 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.

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Ref: CSPA /

## PART B: Core Strategy Representation

Please use a separate form for each representation

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

<b>Name:</b>	Mike Hopkins
<b>Organisation</b>	NS&I/Rowland Homes

1. To which part of the Proposed Submission Core Strategy does this representation relate?	
<b>Policy Reference</b>	CS9
<b>Section/Paragraph Number</b>	
<b>Map Reference</b>	
<b>Appendix Number</b>	

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 checked="" 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?**

The changes made to Policy CS9 are supported and reflect 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.

Continue on a separate sheet/expand box if necessary

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## PART B: Core Strategy Representation

Please use a separate form for each representation

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

<b>Name:</b>	Mike Hopkins
<b>Organisation</b>	NS&I/Rowland Homes

1. To which part of the Proposed Submission Core Strategy does this representation relate?	
<b>Policy Reference</b>	CS24 - South Blackpool Employment Growth
<b>Section/Paragraph Number</b>	
<b>Map Reference</b>	
<b>Appendix Number</b>	

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 checked="" 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 checked="" 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.

**Policy CS24 – South Blackpool Employment Growth**

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 not sound. We consider the Council should critically re-examine their employment land portfolio given the ability of other land and premises available, particularly Whitehills Industrial Estate.

Based upon a market appraisal the prospects of delivering the entire NS&I Site on Mythop Road for employment within the core strategy period is remote.

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.

It is considered that 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.

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

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## PART B: Core Strategy Representation

Please use a separate form for each representation

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

<b>Name:</b>	Mike Hopkins
<b>Organisation</b>	NS&I/Rowland Homes

1. To which part of the Proposed Submission Core Strategy does this representation relate?	
<b>Policy Reference</b>	CS25 - South Blackpool Housing Growth
<b>Section/Paragraph Number</b>	
<b>Map Reference</b>	
<b>Appendix Number</b>	

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 checked="" 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.

The South Blackpool Housing Growth Policy should recognise and specifically identify sites where there is potential for redevelopment for housing or mixed use development.

There is an acknowledged need to rebalance the housing market to address economic decline and out migration of population. The need to provide quality larger family dwellings to retain existing population and attract new residents should be acknowledged.

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.

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.

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

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## PART B: Core Strategy Representation

Please use a separate form for each representation

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

<b>Name:</b>	Mike Hopkins
<b>Organisation</b>	NS&I/Rowland Homes

1. To which part of the Proposed Submission Core Strategy does this representation relate?	
<b>Policy Reference</b>	
<b>Section/Paragraph Number</b>	
<b>Map Reference</b>	Figure 10 - Key Diagram
<b>Appendix Number</b>	

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 checked="" 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.
<p>The specific allocation of the site as "Employment Growth" is objected to.</p> <p>NS&amp;I and Rowland Homes object to the specific identification of the NS&amp;I site as a location for Employment identification of the NS&amp;I site as a location for Employment site within the Spatial Portrait.</p> <p style="text-align: right;">Continue on a separate sheet/expand box if necessary</p>

**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.

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.

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

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## PART B: Core Strategy Representation

Please use a separate form for each representation

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

<b>Name:</b>	Mike Hopkins
<b>Organisation</b>	NS&I/Rowland Homes

1. To which part of the Proposed Submission Core Strategy does this representation relate?	
<b>Policy Reference</b>	
<b>Section/Paragraph Number</b>	
<b>Map Reference</b>	Figure 7
<b>Appendix Number</b>	

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 checked="" 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.

Figure 7 identifies the NS & I site on Mythop Road as "Open Land Meeting Community and Recreational Need". The

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

## PART D: Examination in Public

11. Do you wish to express an interest to participate in the Examination?	
Yes, I wish to participate at the oral Examination	<input checked="" type="checkbox"/>
No, I do not wish to participate at the oral Examination	<input type="checkbox"/>
If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary. Only where a modification is sought to the Core Strategy is there a right for the representation to be heard at an Examination hearing session. Please note that the Inspector, not the Council, will decide who should be invited to speak at the Hearing sessions and also which topics are to be covered at them.	
Continue on a separate sheet/expand box if necessary	

Declaration	
I understand that all representations submitted will be made available for public inspection and will be identifiable to my name and organisation (if applicable).	
Signature: 	Date: 29th August 2014

## 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	Miss	
First Name	Katie	
Last Name	Wray	
Job Title	Assistant Planning Manager	
Organisation	The Co-operative Group	
Address	1 Angel Square	
	Manchester	
Postcode	M60 0AG	
Telephone	07702505544	
Email	katie.wray@co-operative.coop	

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 <input checked="" type="checkbox"/> No <input type="checkbox"/>
Publication of the recommendations of the person appointed to carry out an independent examination of the Core Strategy	Yes <input type="checkbox"/> No <input type="checkbox"/>
Adoption of the Core Strategy	Yes <input type="checkbox"/> No <input type="checkbox"/>

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 <a href="mailto:development.plans@blackpool.gov.uk">development.plans@blackpool.gov.uk</a>

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## PART B: Core Strategy Representation

Please use a separate form for each representation

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

Name:	Katie Wray
Organisation	The Co-operative Group

1. To which part of the Proposed Submission Core Strategy does this representation relate?	
Policy Reference	CS2
Section/Paragraph Number	5.17
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 checked="" 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?**

Please see attached sheet.

Continue on a separate sheet/expand box if necessary

## **Blackpool Council Proposed Submission Core Strategy**

### **Representation**

**The Co-operative Group**

**Katie Wray, Assistant Planning Manager**

**29/09/14**

### **Policy Reference: CS2**

### **Section / Paragraph Number: 5.17**

#### **Introduction**

The Co-operative Group (TCG) supports the allowance made for windfall within the housing land supply figures in Policy CS2 and the justification provided in Paragraph 5.17 given that it will facilitate development of sites such as Co-op Sports Club & Fields, Preston New Road, FY4 4RE, for more suitable and viable uses to meet the needs of the Borough. Our response to Question 9 of the Representation Form is provided below in this regard.

This representation should be read in tandem with other representations by TCG regarding:

- Policy Reference: CS6
- Map Reference: Co-op Sports Club & Fields, Preston New Road, FY4 4RE

#### **Support for the Soundness of the Core Strategy (Q.9)**

TCG consider the allowance made for windfall sites within the housing land supply in Policy CS2 sound as it is justified and consistent with national policy.

The NPPF (Paragraph 48) states that

*Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.*

The Core Strategy Paragraph 5.17 provides this evidence, particularly historic delivery rates (on average 87 windfall homes per annum over the past ten years) and future trends (conversion of holiday properties in to residential). The policy is therefore in line with national policy and entirely justified.

## **Conclusion**

TCG has in depth knowledge of this issue which will be essential in assisting the Inspector in being best informed and considering all the issues including those raised by third parties.

TCG would therefore request inclusion in the Oral Examination to best assist the Inspector in consideration of the matters raised. Should you require any further information or clarification please do not hesitate to contact me.

For official use only

Ref: CSPA /

## PART B: Core Strategy Representation

Please use a separate form for each representation

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

Name:	Katie Wray
Organisation	The Co-operative Group

1. To which part of the Proposed Submission Core Strategy does this representation relate?	
Policy Reference	CS6
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 checked="" type="checkbox"/> No <input type="checkbox"/>
(c) Sound?	Yes <input type="checkbox"/> No <input checked="" 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 checked="" type="checkbox"/> |
| (ii) Not justified                       | <input checked="" 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.

Please see attached sheet.

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

## **Blackpool Council Proposed Submission Core Strategy**

### **Representation**

**The Co-operative Group**

**Katie Wray, Assistant Planning Manager**

**29/09/14**

### **Policy Reference: CS6**

#### **Introduction**

The Co-operative Group (TCG) considers the Core Strategy unsound in regards to Policy CS6: Green Infrastructure as the policy has not been positively prepared and is not justified as drafted. 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.

To make the policy sound TCG require the word '*existing*' to be removed from the following section of Policy CS6.

*In terms of ~~existing~~ open space, sports and recreational buildings and land, including playing fields, these will be protected unless the requirements of paragraph 74 of the NPPF are met.*

This puts an emphasis on only allocating and retaining open space, sports and recreational buildings that are suitable and beneficial to the community.

This representation should be read in tandem with other representations by TCG regarding:

- Policy Reference: CS2 and Section / Paragraph Number: 5.17
- Map Reference: Co-op Sports Club & Fields, Preston New Road, FY4 4RE

The document is structured around Questions 7 and 8 of the *Proposed Submission Core Strategy Representation Form*.

## **Unsound (Q. 7)**

The current allocation is unsound as is not positively prepared and not justified.

### Not positively prepared

As acknowledged by Blackpool Council, the borough has a housing land shortfall, and has consistently under-delivered. It has applied a 20% buffer to its projected five year housing supply figure and currently only has approximately 2 years supply of housing. The Council should therefore be carefully and objectively assessing all potential housing sites to meet this undersupply.

By including the word 'existing' in Policy CS6 it 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. Removal of this word would allow existing open space, sports and recreational buildings and land sites to be qualitatively assessed before given automatic protection.

To date 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. The SHLAA confirms that the Council has not adopted a robust approach in assessing and prioritising sites for residential development and, for example, fails to acknowledge the potential redundant former private sports grounds/sites have to offer.

The NPPF (Paragraph 47) requires local authorities to boost significantly the supply of housing by identifying a supply of **specific** deliverable sites to provide five years' worth of supply. 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.

### Unjustified

Use of the word 'existing' in Policy CS6 assumes all existing open space, sports and recreational buildings and land is suitable and worthy of retention, however this assumption is entirely unjustified as the evidence base is not robust.

The evidence base in relation to open space is the *Blackpool Open Space, Sport, Recreation Audit and Position Statement (2009)*. This is not a robust or credible evidence base as it is:

- a) Out of date
- b) Provides very little qualitative assessment

The Statement is five years old from publication, however the assessment work was undertaken before publication, therefore making the evidence **over five years old**.

According to the Blackpool Local Development Scheme the Core Strategy will be adopted September 2015, by which point this evidence will be over six years old. By the time the Site Allocations and Development Management DPD is adopted it will be June 2018, which will mean the evidence base is at least nine years old.

The Statement is also mainly quantitative. Where qualitative assessments are made, these are generic, providing no grading of quality, and broad-brushed. Sites are not individually qualitatively assessed, with, for example, a scoring mechanism.

Particularly, in light of the lack of five year land supply, a qualitative assessment should be undertaken of all open spaces to establish where they are no longer functioning and therefore offer opportunities to meet the five year land supply.

Paragraph 73 of the NPPF states that:

*Planning policies should be based on **robust and up-to-date** assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and **quantitative or qualitative deficits or surpluses** of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.*

The *Blackpool Open Space, Sport, Recreation Audit and Position Statement (2009)* is not robust or up-to-date and cannot be relied upon in formation of the Core Strategy. In this regard the use of the word 'existing' in Policy CS6 is unjustified.

### **Proposed Modification (Q.8)**

As detailed above the use of the word 'existing' in Policy CS6 is unsound. Removal of this word 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. The suggested wording is as follows:

*In terms of open space, sports and recreational buildings and land, including playing fields, these will be protected unless the requirements of paragraph 74 of the NPPF are met.*

## **Conclusion**

TCG has in depth knowledge of this issue which will be essential in assisting the Inspector in being best informed and considering all the issues including those raised by third parties.

TCG would therefore request inclusion in the Oral Examination to best assist the Inspector in consideration of the matters raised. Should you require any further information or clarification please do not hesitate to contact me.

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>	Katie Wray
<b>Organisation</b>	The Co-operative Group

1. To which part of the Proposed Submission Core Strategy does this representation relate?	
<b>Policy Reference</b>	
<b>Section/Paragraph Number</b>	
<b>Map Reference</b>	Co-op Sports Club&Fields, Preston New Road, FY4 4RE
<b>Appendix Number</b>	

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 checked="" type="checkbox"/>	No <input type="checkbox"/>
(c) Sound?	Yes <input type="checkbox"/>	No <input checked="" 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 checked="" type="checkbox"/> |
| (ii) Not justified                       | <input checked="" type="checkbox"/> |
| (iii) Not effective                      | <input type="checkbox"/>            |
| (iv) Not consistent with national policy | <input checked="" 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.

Please see attached sheet.

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.

Please see attached sheet.

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

## **Blackpool Council Proposed Submission Core Strategy**

### **Representation**

**The Co-operative Group**

**Katie Wray, Assistant Planning Manager**

**29/09/14**

### **Map Reference: Co-op Sports Club & Fields, Preston New Road, FY4**

#### **4RE**

#### **Introduction**

These representations are submitted to justify the re-allocation of the former Co-op Sports Club & Fields, Preston New Road, FY4 4RE (Preston New Road site) from *Playing Fields and Sports Grounds, Policy BH7* in the outdated Local Plan (1999) Proposals Map for residential use. The Core Strategy Proposed Submission Policies Maps proposes to retain the out of date allocation which is unsound and not justified. This allocation should be updated to recognise the opportunity for the comprehensive development of the site for circa 50-60 homes. There would be no adverse impact in releasing the redundant private former club which would be more suitably utilised as residential land to meet growing housing needs and deliver more affordable housing.

The site comprises a private disused sports pitches to the rear (a football pitch and two bowling greens) with sports pavilion. The pitches and pavilion are redundant and require significant investment if they are to be brought back to practical use which cannot be secured without higher value uses. A comprehensive allocation for residential should include the single storey, brick built, former social club with associated parking at the front of the site, also within the ownership of The Co-operative Group (TCG). The pitches are entirely enclosed by existing development and do not form part of a wider strategic allocation of green space or provide an essential break which is intrinsic in establishing the urban and residential/mixed use character of the area. A site plan of the proposed residential allocation is attached.

These representations justify why the site is appropriate for residential use and retaining the historic outdated allocation as playing fields and sports grounds is not

justified. The site does not fulfil any value to the community or environment in an already well-established residential area.

This representation is submitted in tandem with other representations by TCG regarding:

- Policy Reference: CS2 and Section / Paragraph Number: 5.17
- Policy Reference: CS6

The document is structured around Questions 7, 8 and 9 of the *Proposed Submission Core Strategy Representation Form*.

### **Unsound (Q. 7)**

The current allocation is unsound as is not positively prepared, not justified and not consistent with national policy.

#### Not positively prepared

As acknowledged by Blackpool Council, the borough has a housing land shortfall, and has consistently under-delivered. It has applied a 20% buffer to its projected five year housing supply figure and currently only has approximately 2 years supply of housing. The Council should therefore be carefully and objectively assessing all potential housing sites to meet this undersupply. Allocation of the Preston New Road site for housing would help to meet this undersupply and demonstrate that the Council is positively approaching its housing shortage.

The Council has assessed that it needs to provide 4,200 new homes between 2012 and 2027 located on:

- Identified sites within the existing urban area, including major regeneration sites – 1,950 homes, identified via the SHLAA
- Identified sites within the South Blackpool Growth area – 2 sites to provide 750 homes
- Windfall sites – 1,500 homes

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 Preston New Road. The SHLAA confirms that the Council has not adopted a robust approach in assessing and prioritising sites for residential development and fails to acknowledge the potential redundant former

private sports grounds/sites have to offer. In this regard the Preston New Road site was discounted from forming part of the SHLAA supply, despite it no longer providing a functioning recreation area, and being able to contribute to the five year land supply.

The NPPF (Paragraph 47) requires local authorities to boost significantly the supply of housing by identifying a supply of **specific** deliverable sites to provide five years' worth of supply. In adapting the narrow approach in its' SHLAA, 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.

### Unjustified

The Core Strategy Proposed Submission Policies Maps is unjustified in not re-allocating the Preston New Road site for residential use. As discussed above, this is because the site has not been positively identified for housing in the SHLAA, being discounted because of its outdated and historic BH7 allocation. However, regard should have been made to a qualitative assessment of open space, sport and recreation within the borough. The Preston New Road site is no longer functioning as accessible and viable open space. The pitches and bowling greens need investment to be practically re-used which cannot be secured. The club associated with the sports facility closed in July 2013 as it was no longer financially viable. Despite the pitches and greens being available for private play until the social club closed in July 2013 they have not been used for several years.

The evidence base in relation to open space is the *Blackpool Open Space, Sport, Recreation Audit and Position Statement (2009)*. However this is not a robust or credible evidence base as it is:

- a) Out of date
- b) Provides very little qualitative assessment

The Statement is five years old from publication, however the assessment work was undertaken before publication, therefore making the evidence **over five years old**.

According to the Blackpool Local Development Scheme the Core Strategy will be adopted September 2015, by which point this evidence will be over six years old.

The Statement is also mainly quantitative. Where qualitative assessments are made, these are generic, providing no grading of quality, and broad-brushed. Sites are not individually qualitatively assessed, with, for example, a scoring mechanism.

Particularly, in light of the lack of five year land supply, a qualitative assessment

should be undertaken of all open spaces to establish where they are no longer functioning and therefore offer opportunities to meet the five year land supply.

Paragraph 73 of the NPPF states that:

*Planning policies should be based on **robust and up-to-date** assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and **quantitative or qualitative deficits or surpluses** of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.*

The *Blackpool Open Space, Sport, Recreation Audit and Position Statement* (2009) is not robust or up-to-date and cannot be relied upon in formation of the Core Strategy. In this regard the continued allocation of the Preston New Road site is unjustified.

#### Inconsistency with national policy

As highlighted above the Core Strategy is inconsistent with the following sections of the NPPF:

- Paragraph 47
- Paragraph 73

#### **Proposed Modification (Q.8)**

As detailed above the continued allocation of the Preston New Road site as *Playing Fields and Sports Grounds* is unsound. Its re-allocation for housing would rectify this as it is more sustainable and deliverable. In accordance with the NPPF the site is available now, is a suitable location and is achievable. The suitability of the site for housing is further discussed below.

#### Housing Need

There is a substantial shortfall in the provision of housing in the local authority area, with significantly less than a 5-year supply of deliverable housing land. Family housing is much needed in the locality and this site is in a suitable, highly, sustainable location. Affordable housing can be offered on site or an off-site contribution sought. An illustrative layout plan is appended to this statement to demonstrate how 47 units can be easily accommodated on site.

## Accessibility

The site is within the urban area of Blackpool with easy access to services and employment. It is situated on the A583, the main link road from the M55 in to Blackpool. The nearest train station is within 2 miles, Blackpool South and bus stops within 5 minutes walk. The site is therefore well connected.

## Local facilities

There are ample facilities in the local area to service a residential development including:

- Two primary schools and a high school within 0.5 miles
- Two large supermarkets within two miles
- Open space on Sunningdale Avenue within 0.5 miles

## Suitability

The site is within a residential suburb of Blackpool of primarily red brick semi-detached housing. The proposed development of this site for family style housing would be entirely in keeping with the surrounding area.

## Deliverability

To be considered deliverable, the NPPF states that a site should be available now, offer a suitable location for development now and be deliverable with a realistic prospect that housing will be delivered on the site within five years (NPPF, Footnote 11, Paragraph 47).

The site is clearly available now with TCG seeking to promote and sell the site for residential development. It has no known constraints or major infrastructure requirements which would affect its availability.

The site is a highly suitable location for development as addressed above.

In terms of there being a realistic prospect that housing will be delivered on the site in the next five years, TCG are preparing an outline application for residential for the site and this is based on sound market knowledge that the site will come forward for development and can help address short term housing need.

Before investing in any application, the Co-operative Group undertake market analysis to determine whether or not to commit the significant finance required to prepare a planning application. Should planning permission be granted, TCG would

seek to sell the site promptly (within six weeks of marketing), entering into a contract with a minimum 10% deposit so as to raise a capital receipt against the investment made to date.

## **Conclusion**

The Core Strategy Proposed Submission Policies Maps proposes to retain the out of date allocation for the Preston New Road Site which is unsound and unjustified. This allocation should be updated to recognise the opportunity for the comprehensive development of the site for circa 50-60 homes. There would be no adverse impact in releasing the redundant private former club which would be more suitably utilised as residential land to meet growing housing needs and deliver more affordable housing.

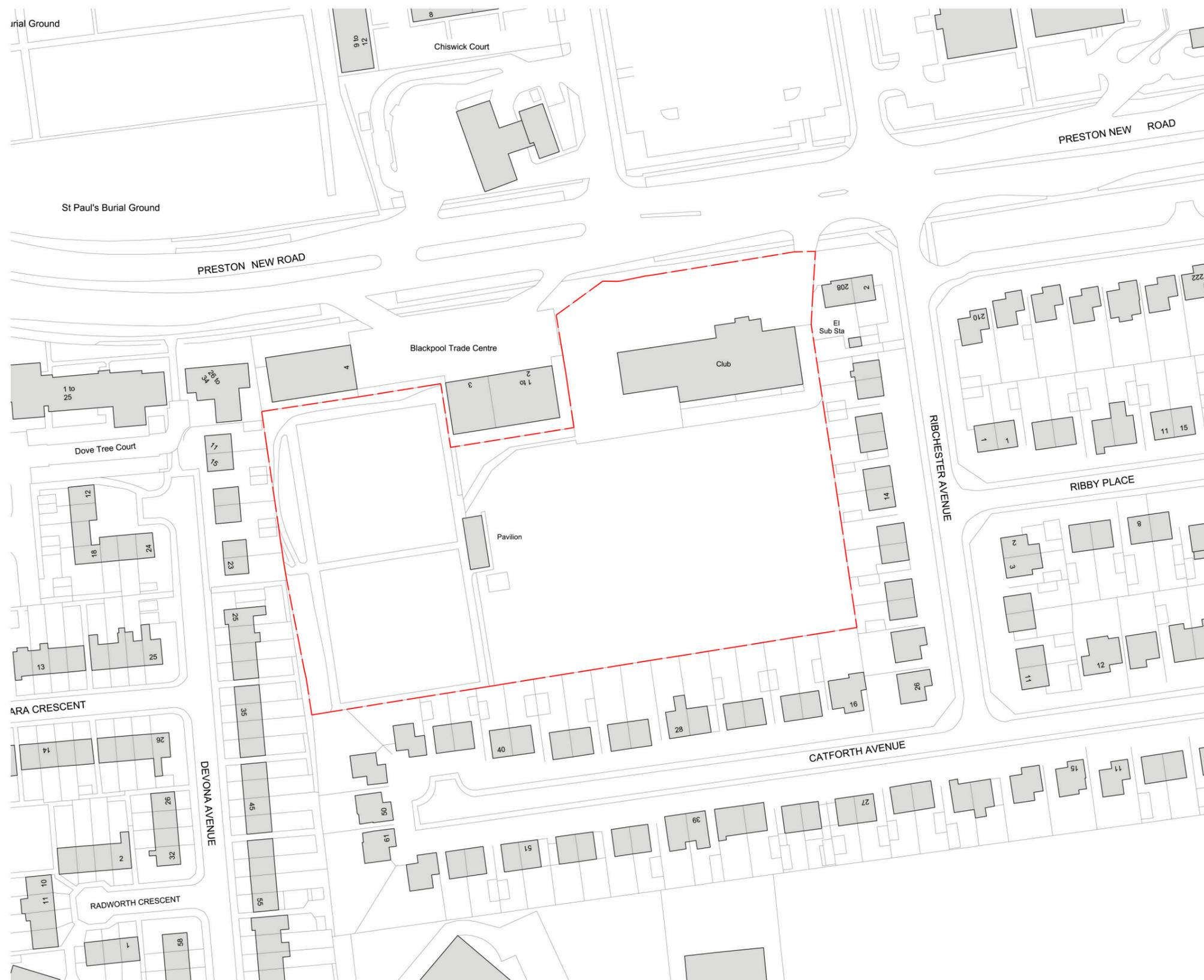
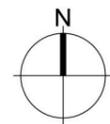
TCG has in depth knowledge of this issue which will be essential in assisting the Inspector in being best informed and considering all the issues including those raised by third parties.

TCG would therefore request inclusion in the Oral Examination to best assist the Inspector in consideration of the matters raised. Should you require any further information or clarification please do not hesitate to contact me.

## PART D: Examination in Public

<b>11. Do you wish to express an interest to participate in the Examination?</b>	
Yes, I wish to participate at the oral Examination	<input checked="" type="checkbox"/>
No, I do not wish to participate at the oral Examination	<input type="checkbox"/>
If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary. Only where a modification is sought to the Core Strategy is there a right for the representation to be heard at an Examination hearing session. Please note that the Inspector, not the Council, will decide who should be invited to speak at the Hearing sessions and also which topics are to be covered at them.	
TCG has in depth knowledge of this issue which will be essential in assisting the Inspector in being best informed and considering all the issues including those raised by third parties.	
TCG would therefore request inclusion In the Oral Examination to best assist the Inspector In consideration of the matters raised. Should you require any further information or clarification please do not hesitate to contact me.	
Continue on a separate sheet/expand box if necessary	

<b>Declaration</b>	
I understand that all representations submitted will be made available for public inspection and will be identifiable to my name and organisation (if applicable).	
Signature: 	Date: 29/08/14



A scale updated, text removed. 27.03.14 mrd  
 - first issue - - - - -

Revisions

Status

**INFORMATION**

Client  
**THE CO-OPERATIVE GROUP**

Project  
**PRESTON NEW ROAD  
 BLACKPOOL**

Title  
**EXISTING SITE PLAN**

Scale	Size	Date	Drawn	Checked
1:1250	A3	07.08.09	SW	LM

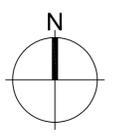
3Dreid  
 83 Fountain Street,  
 Manchester, M2 2EE  
 t: +44 (0)161 236 7070  
 f: +44 (0)161 236 7077  
 w: <http://www.3dreid.com>  
 Birmingham Edinburgh Falkirk  
 Glasgow London Manchester



Project No. 090288 Drawing No. 001 Rev. A



Notes  
Do not scale from this drawing. All dimensions to be checked on site prior to construction and any discrepancies reported to the Architect. Copyright reserved.



**RESIDENTIAL KEY**

8 no.		2 bed (with integral garage)
4 no.		2 bed (without integral garage)
19 no.		3 bed (with integral garage)
16 no.		4 bed (with integral garage)
47 no. total		
SITE AREA		= 1.574 HECTARES
SITE DENSITY		= 30 DPH

- first issue 23.04.14  
Revisions

Status  
**INFORMATION**

Client  
**THE CO-OPERATIVE GROUP**

Project  
**PRESTON NEW ROAD  
BLACKPOOL**

Title  
**PROPOSED SITE PLAN  
OPTION C - RESIDENTIAL**

Scale	Size	Date	Drawn	Checked
1:500	A1	April 14	mrd	MD

**3Dreid**  
83 Fountain Street,  
Manchester, M2 2EE  
t : +44 (0)161 236 7070  
f : +44 (0)161 236 7077  
w : http://www.3dreid.com  
Birmingham Edinburgh Falkirk  
Glasgow London Manchester



Project No.	Drawing No.	Rev.
<b>090288</b>	<b>006</b>	-

## 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)
<b>Title</b>	Mr	
<b>First Name</b>	Maurice	
<b>Last Name</b>	Brophy	
<b>Job Title</b>	Planning and Housing Policy Manager	
<b>Organisation</b>	Lancaster City Council	
<b>Address</b>	Regeneration and Planning Service	
	PO Box 4	
	Town Hall	
	Lancaster	
<b>Postcode</b>	LA1 1QR	
<b>Telephone</b>	01524 582388	
<b>Email</b>	planningpolicy@lancaster.gov.uk	

### 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)

**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>	Maurice Brophy
<b>Organisation</b>	Lancaster City Council

1. To which part of the Proposed Submission Core Strategy does this representation relate?	
<b>Policy Reference</b>	CS2: Housing Provision
<b>Section/Paragraph Number</b>	5.7
<b>Map Reference</b>	
<b>Appendix Number</b>	

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 checked="" 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?**

Please see attached sheet

Continue on a separate sheet/expand box if necessary

## **Policy CS2: Housing Provision**

Lancaster City Council recognises that Blackpool Council's chosen housing requirement falls within the range of 250 - 400 dwellings per annum as recommended in the Fylde Coast Strategic Housing Market Assessment (published February 2014). This figure is further refined in Towards An Objective Assessment of Housing Need in Blackpool - Analysis of Economic and Housing Forecasts (May 2014) using the Oxford Economics jobs-led scenario that produces an average housing requirement of 281 dwellings per annum and is planned to be accommodated within their own boundaries. Despite this being a jobs-led approach it predicts a loss of 919 jobs over 15 years or 62 jobs per annum.

While this figure has been reached through the use of robust evidence, it is noted that Blackpool Council's Core Strategy - Proposed Submission (para 5.7) has taken a deliberate policy stance of discouraging economically inactive migrants to their area. This policy approach could be seen to be contrary to the advice given in the PAS Objectively Assessed Need and Housing Targets Technical Advice Note that states "if demographic projections do not provide enough resident workers to fill the expected workplace jobs they should be adjusted upwards until they do. But if the demographic projections provide more workers than are required to fill the expected jobs, they should not be adjusted downwards" (para. 6.2, 2014). While the quoted advice from PAS focuses on economically active in-migrants it is also noted that the Planning Inspector at the Bath and North East Somerset Core Strategy examination, amongst others, has raised that much of the demand for housing is not driven by job opportunities, and people who do not work also need somewhere to live (ibid).

The City Council is conscious of the pressures that central Blackpool faces for cheaper and single person accommodation following the recent changes to the welfare system, There is, however, a concern that by opting to no longer cater for the needs of housing benefit claimants that have been priced out of their own areas, the need will not simply go away and will need to be addressed elsewhere.

Maurice Brophy  
Lancaster City Council  
29/08/2014

**For official use only**

Ref: CSPA /

## PART B: Core Strategy Representation

Please use a separate form for each representation

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

<b>Name:</b>	Maurice Brophy
<b>Organisation</b>	Lancaster City Council

1. To which part of the Proposed Submission Core Strategy does this representation relate?	
<b>Policy Reference</b>	Policy CS3: Economic Development and
<b>Section/Paragraph Number</b>	7.10 - 7.11
<b>Map Reference</b>	
<b>Appendix Number</b>	

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 checked="" type="checkbox"/> No <input type="checkbox"/>
(c) Sound?	Yes <input type="checkbox"/> No <input type="checkbox"/>

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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?**

Please see attached sheet

Continue on a separate sheet/expand box if necessary

### **Policy CS3: Economic Development and Employment**

Policy CS3 has a positive policy position regarding the supporting of and growing existing and new businesses in the Blackpool area with an agreement in place with Fylde Council for the allocation of a 14 hectare site within their district to accommodate Blackpool's employment land shortfall.

However the approach to the requirement of employment land is potentially at odds with the approach taken to housing. As mentioned in the response to CS2 previously the housing requirement has been based on the Oxford Economics scenario that suggests there will be a small decline in the Blackpool economy over the next 15 years, resulting in an excess of between 5.4 and 7.4 ha of employment land by 2027. However, in the Blackpool Employment Land Study 2013 - Final Version (June 2014) the favoured approach is the Historic Land Take-up Forecast which suggests that 31.5 ha of employment land is required up to 2027, with a predicted shortfall of 13.7 ha of supply against the long term historic trend forecast (para. 7.10-11).

Lancaster City Council does not object to the approach taken on duty to cooperate grounds but advises that there may be a conflict in objectives if seeking to establish a fully joined-up strategic approach to the housing and employment needs of the Blackpool area for its new plan period.

Maurice Brophy  
Lancaster City Council  
29/08/2014

## PART D: Examination in Public

11. Do you wish to express an interest to participate in the Examination?	
Yes, I wish to participate at the oral Examination	<input type="checkbox"/>
No, I do not wish to participate at the oral Examination	<input type="checkbox"/>
<p>If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary. Only where a modification is sought to the Core Strategy is there a right for the representation to be heard at an Examination hearing session. Please note that the Inspector, not the Council, will decide who should be invited to speak at the Hearing sessions and also which topics are to be covered at them.</p>	
<p>Continue on a separate sheet/expand box if necessary</p>	

Declaration	
<p>I understand that all representations submitted will be made available for public inspection and will be identifiable to my name and organisation (if applicable).</p>	
Signature:	Date:



Homes &  
Communities  
Agency

Jane Saleh  
Head of Development Plans and Projects  
Planning Department  
Blackpool Council  
PO Box 17  
Corporation Street  
Blackpool  
FY1 1LZ  
<mailto:development.plans@blackpool.gov.uk>

29 August 2014

Dear Jane,

## **Homes and Communities Agency Response Blackpool Core Strategy – Proposed Submission**

Further to the publication of the above consultation document, the Homes and Communities Agency (the HCA) welcomes the opportunity to comment on the Blackpool Core Strategy – Proposed Submission. The HCA's representations are made within this letter, and we have not submitted them separately in any other form.

For the purposes of clarity, the representations contained in this letter relate primarily to the HCA's areas of influence within the Borough, and are made with a view to supporting the Council through the Agency's enabling and investment role.

You will be aware that the HCA also made representations in relation to the Blackpool Core Strategy – Revised Preferred Option in July 2012. Those previous representations were generally supportive of the strategic approach outlined at that time, and this remains the case for the Proposed Submission.

### **1. General observations**

#### **Role of the Homes and Communities Agency**

The HCA is the national housing and regeneration agency for England, and contributes to economic growth by helping communities to realise their aspirations for prosperity and to deliver quality housing that people can afford.

The HCA is keen to ensure that the vision and policies of the Core Strategy provide an appropriate framework for locally agreed development and regeneration in Blackpool, and regards the Core Strategy as a key document to support a sustainable policy framework for future growth within the Borough.

Through its regeneration and affordable housing programmes, and through the economic development activities of the former NWDA, HCA has made significant investments in a range of key projects, particularly in the Town Centre and South Beach areas. Given the number and size of projects which it will potentially influence, the HCA is an important delivery and enabling partner to the Council in achieving the intended outcomes of the Core Strategy.

We are accordingly pleased to note that the Proposed Submission contains a range of policies that will help to support the appropriate future delivery of the schemes in which HCA has been involved.

### **HCA's strategic approach in the Fylde Coast**

The Local Investment Plan (LIP) for the Fylde Coast (Blackpool, Fylde and Wyre) clarified local objectives and priorities for capital investment in housing and regeneration in support of economic growth over the 2011-14 period. The document has also helped to inform HCA's programmes of investment and enabling support in the area.

The LIP outlined thematic and spatial priorities for investment across the Fylde Coast. With particular reference to Blackpool, the LIP suggested spatial priorities around the '*Central Blackpool Approach & Blackpool Town Centre*' (where the HCA has made a number of investments in support of the transformation of the town centre and residential offer), and the '*M55 Hub area and Blackpool International Airport Corridor*' (new employment and housing development close to transport links and urban centres).

Thematic priorities included the enhancement of the residential offer in inner Blackpool with a wider range of house types and increased owner occupation, the reduction in concentrations of deprivation on large social housing estates, and increased rates of new house building to meet long term demand, including affordable homes.

Some of the key evidence and strategies informing the LIP have also informed the production of the Core Strategy, and we would therefore expect to see some continuity in terms of strategic approach. This is generally borne out in the Proposed Submission, and the HCA accordingly support the overall approach taken.

## **2. Proposed Submission : HCA observations on key policies**

The HCA has the following observations to make in relation to the Proposed Submission :-

### **Core Policies**

#### Policy CS2 : Housing Provision

The Proposed Submission identifies three main sources for delivery of the planned housing supply :

- Identified sites within the existing urban area, including major regeneration sites such as Rigby Road and Queens Park, both of which the HCA is supporting in various ways.
- Identified sites within South Blackpool – this includes land at Moss House Road and at Whyndyke Farm within the 'M55 Hub' area prioritised in the LIP.
- Windfall sites.

The HCA supports the policy of promoting the development of key urban sites (particularly Rigby Road and Queens Park) in order to maximise regeneration impacts, but also recognises that the scope to deliver new housing within the existing urban area is limited, and that the South Blackpool area (together with development of windfall sites) offers an opportunity both to make appropriate provision and to provide a complementary offer to that being pursued closer to the centre of the town.

#### Policy CS3: Economic Development and Employment

HCA welcomes the continuing focus on the Town Centre as a location for the development of a functional central business district for the Borough, and also the emphasis on South Blackpool as a strategic location for employment growth, in tandem with the provision of new housing detailed at Policy CS2.

#### **Other policies**

##### Policy CS12 : Sustainable Neighbourhoods

This policy identifies priority inner area neighbourhoods, and also outer estate neighbourhoods, as places where investment will be focussed to address housing, environmental and economic issues and to create sustainable communities.

For inner areas, the policy outlines the need to redefine the role of areas such as Foxhall and South Beach to promote new residential development alongside the retention of quality holiday accommodation, and refers to opportunities at key sites including Rigby Road to create a wider housing offer close to the seafront. Since the Preferred Option stage, HCA has worked with the Council in respect of the latter site to assist in the delivery of this important redevelopment .

The HCA also continues to support the Council's work in Outer Estate Priority Neighbourhoods, such as the Queens Park Estate, whose redevelopment is being supported by the Affordable Homes Programme.

##### Policy CS17 : Blackpool Town Centre

This policy mirrors Policy CS4 in respect of the focus on the Town Centre for retail and other town centre uses, but also identifies the need to exploit and strengthen other aspects of the town centre offer, for example its heritage and entertainment assets, while further policies CS18 : Winter Gardens, CS19 : Central Business District (Talbot Gateway) and CS20 : Leisure Quarter develop more detailed policies for the development of leisure and business in the Town Centre. Again, the HCA has worked with the Council to help to secure the delivery of appropriate outcomes for these initiatives.

### **3. Conclusion**

The HCA remains supportive of the Core Strategy process and looks forward to working with the Council to deliver and enable local priorities. In the meantime, please do not hesitate to contact Chris Henshall, HCA Area Manager for the Fylde Coast, (0161 200 6154) or Nick Jackson , Senior Area Manager (0161 200 6125) should any further information or clarification be required.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Deborah McLaughlin', written in a cursive style.

**Deborah McLaughlin**  
**Executive Director - North West**



Developer Services &  
Planning  
1<sup>st</sup> Floor, Grasmere House  
Lingley Mere Business Park  
Lingley Green Avenue  
Warrington  
WA5 3LP

Jenny.Hope@uuplc.co.uk

<b>Your ref</b>	
<b>Our ref</b>	DC-14-2756
<b>Date</b>	28 August 2014

Planning Department  
Blackpool Council  
PO Box 17  
Corporation Street  
Blackpool  
FY1 1LZ

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

Dear Sir / Madam,

**BLACKPOOL LOCAL PLAN PART 1: CORE STRATEGY – SUBMISSION VERSION CONSULTATION**

Thank you for your consultation seeking the views of United Utilities as part of the Development Plan process.

United Utilities wishes to build a strong partnership with all Local Planning Authorities (LPAs) to aid sustainable development and growth within the North West. We aim to proactively identify future development needs and share our information. This helps:

- ensure a strong connection between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

When preparing the Development Plan and future policies, we can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity. It may be necessary to co-ordinate the delivery of development with the delivery of infrastructure in some circumstances. We've suggested some amendments below to reflect this.

(Continued...)

The emerging Local Plan Part 1: Core Strategy will be a key planning document for Blackpool, setting the level and general location of new development to meet its future needs to 2027. United Utilities has commented on previous stages of the document's preparation including the 'Revised Preferred Option' consultation in July 2012 (UU Ref: DC/12/2964). More recently, UU submitted comments via email in May 2014 relating specifically to draft Core Strategy Policy CS9: Water Management.

United Utilities now wishes to submit the following comments to the Council for consideration as part of the current 'Proposed Submission Core Strategy' consultation, which runs until 5pm on Friday 29 August 2014.

## **GENERAL COMMENTS**

United Utilities recognises that it is too early to comment on specific locations where the Council may be seeking to promote new development, and this will become apparent when it progresses its 'Local Plan Part 2: Site Allocations and Development Management document'. Nevertheless, we wish to highlight that United Utilities will seek to work closely with the Council during the Local Plan process to develop a coordinated approach for delivering sustainable growth in sustainable locations.

New development should be focused in sustainable locations which are accessible to local services and infrastructure. United Utilities will continue to work with the Council to identify any infrastructure issues and appropriate resolutions throughout the development of the Local Plan. When more information is available on the locations for development it may be necessary to co-ordinate the delivery of new development with the delivery of infrastructure through the detailed policies. We suggest that this should be included as a detailed development management policy. We can advise on an appropriate wording.

Please note that United Utilities wishes to undertake further ongoing discussions with the Council on technical matters relating to site-specific development, such as site drainage and the Surface Water Hierarchy, once individual allocations are identified. In your site selection criteria, we would encourage you to consider the availability of alternatives to the public sewerage system for surface water discharges. For example, sites with land drains would normally have an available alternative to the public sewer. However, please be aware that Blackpool has an unusual drainage system with many surface water sewers and watercourses connecting with the public combined sewer either directly or indirectly. This places a strain on wastewater infrastructure and results in the treatment and pumping of surface water which is not preferable.

## **SPECIFIC COMMENTS**

### **Policy CS9: Water Management**

United Utilities requests the following amendments/additions (highlighted in red) to Policy CS9: Water Management:

#### ***Body of the Policy***

We request the following addition to bullet point (e) of Policy CS9:

*"To reduce flood risk, manage the impacts of flooding and mitigate the effects of climate change, all new development must [inter alia]:*

- e. 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;"*

Reason – 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.

### **Supporting Text to Policy CS9**

United Utilities welcomes reference to the surface water hierarchy in the supporting text to Policy CS9. Furthermore, we also welcome the introduction of paragraph 5.143, which reads as follows:

*"Landowners and developers are encouraged to undertake early engagement with United Utilities and the Environment Agency to limit the impact of surface water on existing infrastructure and to most appropriately manage the impact of growth. To support applications landowners/developers should produce drainage strategies for each phase of the proposed development in agreement with the Local Planning Authority, Environment Agency and United Utilities, to ensure drainage infrastructure is delivered in a holistic and co-ordinated manner."*

However, we suggest the following text should be included immediately after the surface water hierarchy (paragraph 5.142):

*"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.*

*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 leaf cover. In seeking to most appropriately manage the impact of surface water run-off, developers will be expected to include 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.*

*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."*

Reason – we 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.

## **Policy CS11: Planning Obligations**

Whilst United Utilities recognises that the Core Strategy is supported by an Infrastructure Delivery Plan (IDP), and also makes reference to infrastructure provision in the supporting text to Policy CS11: Planning Obligations, we consider the Core Strategy should include a specific policy in relation to local infrastructure provision. We think this would be most appropriately considered as a separate policy to Policy CS11: Planning Obligations. As an alternative to a separate policy, the council could include additional wording to the supporting text of Policy CS11. This could be included as either a separate policy or as additional wording to Policy CS11:

*"5.162 The Council will ensure that new developments provide the necessary physical, social and green infrastructure to meet local needs and achieve sustainable development, and do not result in infrastructure deficiencies or exacerbate other problems. The impact of all development proposals will need to be fully assessed and where developments have potentially significant implications on infrastructure, applicants will be required to submit assessments in support of their development proposal.*

*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 development with timing for the delivery of infrastructure improvements.*

*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.*

*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."*

Reason – 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.

## **Policy CS25: South Blackpool Housing Growth**

Draft Policy CS25 currently reads as follows. We suggest the following amendment:

- 1. Land is identified at Whyndyke (Mythop Road) and Moss House Road to provide around 750 new dwellings. Development will be required to provide quality housing of a type and mix that complements rather than competes with the form of housing being delivered in the inner areas.*
- 2. 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 water network within Blackpool.*

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. Please note that the impact on the sewer network will be better understood once more details are known about the development proposals.

In light of the limitations associated with the existing infrastructure provision in the area, we recommend introducing the following wording to the supporting text of Policy CS25, at Paragraph 8.22:

*"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.*

*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."*

## **Summary**

We trust the above comments will be afforded due consideration by the Council in the preparation of its Local Plan. United Utilities would welcome the opportunity to meet with Blackpool Council to discuss our response in detail.

In the meantime, if you have any queries or would like to discuss this representation, please do not hesitate to contact me.

Yours faithfully

Jenny Hope  
LDF Planning Manager  
Developer Services & Planning  
United Utilities PLC

**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)
<b>Title</b>		Mr
<b>First Name</b>		Nick
<b>Last Name</b>		Laister
<b>Job Title</b>		Senior Director
<b>Organisation</b>	Blackpool Pleasure Beach Ltd	RPS Planning & Development Ltd
<b>Address</b>	525 Ocean Boulevard	20 Western Avenue
	Blackpool	Milton Park
		Abingdon
<b>Postcode</b>	FY4 1EZ	OX14 4SH
<b>Telephone</b>		01235 838214
<b>Email</b>		nick.laister@rpsgroup.com

**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**

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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)

**For official use only**

Ref: CSPA /

## PART B: Core Strategy Representation

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

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

<b>Name:</b>	Nick Laister (RPS)
<b>Organisation</b>	Blackpool Pleasure Beach Ltd

1. To which part of the Proposed Submission Core Strategy does this representation relate?	
<b>Policy Reference</b>	
<b>Section/Paragraph Number</b>	Goal 3, Objective 15
<b>Map Reference</b>	
<b>Appendix Number</b>	

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

The focus is to ensure retail uses are directed to the town centre to offer a high quality shopping destination. However, this raises a number of issues in relation to both whether it is positively prepared and effective. In accordance with Council guidance, we have completed a separate form for each objection.

Objective 15 states that the Plan will secure investment in retail, leisure and “*other town centre uses*” in Blackpool Town Centre. The definition of town centre uses in the National Planning Policy Framework include, inter alia, retail development, leisure, entertainment and tourism development. The effect of this Objective is likely to be to steer all of this type of development into the Town Centre, and this is backed up by specific policies later in the Plan which we consider on separate representation forms. Goal 3 also relates to the Resort Core, in which Blackpool Pleasure Beach and several other attractions are located, including the Sandcastle Waterpark and South Pier. The Town Centre boundary has been extended to include the attractions along the ‘Golden Mile’ between Central Pier and the Tower.

In most towns, this approach would be entirely appropriate. In Blackpool, as with other seaside resorts which rely heavily on the appeal of their visitor attractions to draw large numbers of people to the town, 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. Otherwise investment in new tourist attractions, and other tourism-related development, may be suppressed outside the Town Centre boundary. That surely cannot have been the intention of the Council, as Blackpool’s appeal relies on tourism, and associated leisure and tourism retail development, coming forward along the seafront as much as in the Town Centre.

Blackpool Pleasure Beach is the largest commercial visitor attraction in the town, and one of the most famous and prominent attractions in the United Kingdom. The Pleasure Beach has aspirations to continue to invest in major new projects that would fall within the definition of a town centre use, including tourism, leisure and tourism retailing uses. Goal 3 as currently proposed will potentially reduce the extent to which new tourism and leisure-related developments can come forward in the park because this type of development may be directed to the Town Centre. It also raises issues of investor confidence. Given the extent to which Blackpool relies on the national and regional appeal of the Pleasure Beach, this cannot be an intended consequence of this policy.

In addition, there are 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, as this investment would be focussed on the area north of Chapel Street and the rest of the Town Centre.

The Objective also directly contradicts other statements and policies in the Plan. For example, the ‘Vision for Blackpool’ (Page 22), which states: ***“The Promenade [will be] revitalised, with quality development providing excellent attractions and accommodation, and public realm enhancements supporting an exciting cultural programme of events and festivals.”*** Goal 3 (Objective 15) will not be effective as it will undermine this aspiration, potentially resulting in investment being concentrated on one small part of the seafront that falls within the Town Centre boundary. Policy CS1 states that ***“Blackpool’s future growth, development and investment will be focused on inner area regeneration, comprising... (b) The Resort Core, containing the promenade and the majority of resort attractions and facilities, holiday accommodation and major points of arrival.”*** This Policy contradicts Goal 3 (Objective 15).

We acknowledge that the intention of Objective 15 may not be for these uses to be exclusively located in the Town Centre and it may be the Council’s intention for this to work alongside other policies in a flexible manner. However, as currently drafted it is not clear if this is indeed the case, and the policy must be clear to be effective.

We consider that this Objective will therefore not be effective, and will potentially undermine investment at the Pleasure Beach and other sites along the seafront of the Resort Core.

**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.

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. We would suggest rewording as follows:

“15. Secure investment in retail, leisure and other town centre uses in Blackpool Town Centre and the Resort Core seafront 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.”

**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?**

We consider the correct procedures have been followed and it has had regard to the National Planning Policy Framework.

Continue on a separate sheet/exp

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Ref: CSPS /

**For official use only**

Ref: CSPA /

## PART B: Core Strategy Representation

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

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

<b>Name:</b>	Nick Laister (RPS)
<b>Organisation</b>	Blackpool Pleasure Beach Ltd

1. To which part of the Proposed Submission Core Strategy does this representation relate?	
<b>Policy Reference</b>	
<b>Section/Paragraph Number</b>	Goal 3, Objective 15
<b>Map Reference</b>	
<b>Appendix Number</b>	

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

The focus is to ensure retail uses are directed to the town centre to offer a high quality shopping destination. However, this raises a number of issues in relation to both whether it is positively prepared and effective. In accordance with Council guidance, we have completed a separate form for each objection.

Objective 15 states that the Plan will secure investment in retail, leisure and “*other town centre uses*” in Blackpool Town Centre. The definition of town centre uses in the National Planning Policy Framework include, inter alia, retail development, leisure, entertainment and tourism development. The effect of this Objective is likely to be to steer all of this type of development into the Town Centre, and this is backed up by specific policies later in the Plan which we consider on separate representation forms. Goal 3 also relates to the Resort Core, in which Blackpool Pleasure Beach and several other attractions are located, including the Sandcastle Waterpark and South Pier. The Town Centre boundary has been extended to include the attractions along the ‘Golden Mile’ between Central Pier and the Tower.

In most towns, this policy would be entirely appropriate. In Blackpool, as with other seaside resorts which rely heavily on the appeal of their visitor attractions to draw large numbers of people to the town, 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. Otherwise investment in new tourist attractions, and other tourism-related development, may be suppressed outside the Town Centre boundary. That surely cannot have been the intention of the Council, as Blackpool’s appeal relies on tourism, and associated leisure and tourism retail development, coming forward along the seafront as much as in the Town Centre.

Blackpool Pleasure Beach is the largest commercial visitor attraction in the town, and one of the most famous and prominent attractions in the United Kingdom. The Pleasure Beach has aspirations to continue to invest in major new projects that would fall within the definition of a town centre use, including tourism, leisure and tourism retailing uses. Goal 3 as currently proposed will potentially reduce the extent to which new tourism and leisure-related developments can come forward in the park because this type of development may be directed to the Town Centre. It also raises issues of investor confidence. Given the extent to which Blackpool relies on the national and regional appeal of the Pleasure Beach, this cannot be an intended consequence of this policy.

In addition, there are 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, as this investment would be focussed on the area north of Chapel Street and the rest of the Town Centre.

We acknowledge that the intention of Objective 15 may not be for these uses to be exclusively located in the Town Centre and it may be the Council’s intention for this to work alongside other policies in a flexible manner. However, as currently drafted it is not clear if this is indeed the case.

The Objective is not positively prepared as it will not allow the reasonable tourism, leisure and tourism retailing development requirements of the Pleasure Beach, which have been set out in previous representations, to be met.

**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.

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. We would suggest rewording as follows:

“15. Secure investment in retail, leisure and other town centre uses in Blackpool Town Centre and the Resort Core seafront 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.”

**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?**

We consider the correct procedures have been followed and it has had regard to the National Planning Policy Framework.

Continue on a separate sheet/exp

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Ref: CSPS /

**For official use only**

Ref: CSPA /

## PART B: Core Strategy Representation

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

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

<b>Name:</b>	Nick Laister (RPS)
<b>Organisation</b>	Blackpool Pleasure Beach Ltd

1. To which part of the Proposed Submission Core Strategy does this representation relate?	
<b>Policy Reference</b>	Policy CS4
<b>Section/Paragraph Number</b>	
<b>Map Reference</b>	
<b>Appendix Number</b>	

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

Policy CS4 is titled “Retail and Other Town Centre Uses”. This policy reads as if it were a policy solely relating to retail development.

The definition of ‘town centre uses’ in the National Planning Policy Framework include, inter alia, retail development, leisure, entertainment and tourism development. The effect of this Policy will be to steer all of this type of development into the Town Centre, including tourism and leisure development. The Town Centre boundary has been extended to include the attractions along the ‘Golden Mile’ between Central Pier and the Tower, but does not include the large number of other attractions along Blackpool’s seafront inside the Resort Core. These include the Pleasure Beach, Sandcastle Water Park and the three piers.

Part 1 of this policy 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. We do have a comment in relation to this part of the policy, but we deal with that under our ‘positively prepared’ objection.

Part 2 of the Policy is also appropriate and sound.

Part 3 of the Policy could have significant (possibly unintended) consequences for tourism and leisure investment along Blackpool’s seafront. It states that in edge of centre and out of centre locations (which would apply to most of the Resort Core seafront area, including Blackpool Pleasure Beach) that proposals for new retail development and other town centre uses (which are defined in the National Planning Policy Framework as including leisure, entertainment and tourism development) will only permitted if a number of criteria are met. These criteria 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.

In most towns, this policy would be entirely appropriate. In Blackpool, as with other seaside resorts which rely heavily on the appeal of their visitor attractions to draw large numbers of people to the town, 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. Otherwise investment in new tourist attractions, and other tourism-related development, may be suppressed outside the Town Centre boundary. Blackpool’s Promenade, from the Pleasure Beach to North Pier, is the focus of the Town’s tourism appeal. 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. That surely cannot have been the intention of the Council, as Blackpool’s appeal relies on tourism, and associated leisure and tourism retail development, coming forward along the seafront as much as in the Town Centre. This has traditionally been the focus of visitors to the town, and this continues to be the case. This policy could therefore seriously undermine Blackpool’s continued success as a seaside resort.

Blackpool Pleasure Beach is the largest commercial visitor attraction in the town, and one of the most famous and prominent attractions in the United Kingdom. The Pleasure Beach has a requirement to continue to invest in major new projects that would fall within the definition of a town centre use, including tourism, leisure, entertainment and tourism retailing uses. Part 3 of this Policy as currently proposed will potentially reduce the extent to which new tourism and leisure-related developments can come forward in and around the park because this type of development may be directed to the Town Centre. Given the extent to which Blackpool relies on the national and regional appeal of the Pleasure Beach, this cannot be an intended consequence of this policy.

In addition, there are 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 Policy, as this investment would be focussed on the area north of Chapel Street and the rest of the Town Centre. Some of these buildings require large-scale redevelopment, which would have a significant positive benefit to the town's appeal as a resort. It seems counter-productive and inappropriate to place the same restriction on tourism, leisure and entertainment development along Blackpool's seafront as is placed on major retail development.

This policy contradicts other policies in the Plan that support leisure, entertainment and tourism development in Blackpool's Resort Core, and these have been identified in our objections to Goal 3, Objective 15.

The Policy is not effective as it undermines other policies in the Plan and will potentially reduce investment in leisure, entertainment and tourism along Blackpool's seafront.

**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.

Policy CS4 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. We would suggest rewording as follows:

~~"3. In edge of centre and out of centre locations, proposals for new retail development and other town centre uses will only be permitted where it can be demonstrated that:~~

- a. There are no more centrally located/sequentially preferable, appropriate sites available for the development
  - b. The proposal would not cause significant adverse impact on existing centres
  - c. The proposal would not undermine the Council's strategies and proposals for regenerating its centres
  - d. The proposal will be readily accessible by public transport and other sustainable transport modes.
- In the Resort Core, proposals for leisure, entertainment and tourism development (including tourism-related retailing) will be permitted."

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.

**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?**

We consider the correct procedures have been followed and it has had regard to the National Planning Policy Framework.

**For official use only**

Ref: CSPA /

## PART B: Core Strategy Representation

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

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

<b>Name:</b>	Nick Laister (RPS)
<b>Organisation</b>	Blackpool Pleasure Beach Ltd

1. To which part of the Proposed Submission Core Strategy does this representation relate?	
<b>Policy Reference</b>	Policy CS4
<b>Section/Paragraph Number</b>	
<b>Map Reference</b>	
<b>Appendix Number</b>	

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

Policy CS4 is titled "Retail and Other Town Centre Uses". This policy reads as if it were a policy solely relating to retail development.

The definition of 'town centre uses' in the National Planning Policy Framework include, inter alia, retail development, leisure, entertainment and tourism development. The effect of this Policy will be to steer all of this type of development into the Town Centre, including tourism and leisure development. The Town Centre boundary has been extended to include the attractions along the 'Golden Mile' between Central Pier and the Tower, but does not include the large number of other attractions along Blackpool's seafront inside the Resort Core. These include the Pleasure Beach, Sandcastle Water Park and the three piers.

Part 1 of this policy 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 in the UK and internationally. This may be in the form of some consolidation of existing retail floorspace and the introduction of new, larger units that will provide another reason to visit the park. 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. The continued development and upgrading of the park is essential for it to remain viable in a difficult trading environment. 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.

Part 2 of the Policy is appropriate and sound.

Part 3 of the Policy could have significant (possibly unintended) consequences for tourism and leisure investment along Blackpool's seafront. It states that in edge of centre and out of centre locations (which would apply to most of the Resort Core seafront area, including Blackpool Pleasure Beach) that proposals for new retail development and other town centre uses (which are defined in the National Planning Policy Framework as including leisure, entertainment and tourism development) will only permitted if a number of criteria are met. These criteria 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.

In most towns, this policy would be entirely appropriate. In Blackpool, as with other seaside resorts which rely heavily on the appeal of their visitor attractions to draw large numbers of people to the town, 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. Otherwise investment in new tourist attractions, and other tourism-related development, may be suppressed outside the Town Centre boundary. Blackpool's Promenade, from the Pleasure Beach to North Pier, is the focus of the Town's tourism appeal. 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. That surely cannot have been the intention of the Council, as Blackpool's appeal relies on tourism, and associated leisure and tourism retail development, coming forward along the seafront as much as in the Town Centre, possibly even more so. This has traditionally been the focus of visitors to the town, and this continues to be the case. This policy could therefore seriously undermine Blackpool's continued success as a seaside resort and the requirement for it to continually reinvest and renew. For this reason, this policy is not considered to be positively prepared.

Blackpool Pleasure Beach is the largest commercial visitor attraction in the town, and one of the most famous

and prominent attractions in the United Kingdom. The Pleasure Beach has a requirement to continue to invest in major new projects that would fall within the definition of a town centre use, including tourism, leisure, entertainment and tourism retailing uses. Part 3 of this Policy as currently proposed will potentially reduce the extent to which new tourism and leisure-related developments can come forward in and around the park because this type of development may be directed to the Town Centre. Given the extent to which Blackpool relies on the national and regional appeal of the Pleasure Beach, this cannot be an intended consequence of this policy. Undermining necessary investment in leisure, entertainment and tourism development at the Pleasure Beach means that the development and infrastructure requirements of the park will not be met. This policy is not positively prepared.

In addition, there are 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 Policy, as this investment would be focussed on the area north of Chapel Street and the rest of the Town Centre. Some of these buildings require large-scale redevelopment, which would have a significant positive benefit to the town's appeal as a resort. It seems counter-productive and inappropriate to place the same restriction on tourism, leisure and entertainment development along Blackpool's seafront as is placed on major retail development.

This policy contradicts other policies in the Plan that support leisure, entertainment and tourism development in Blackpool's Resort Core.

The Policy is not positively prepared as it is not seeking to meet the development requirements of leisure, entertainment and tourism operators in the Resort Core.

**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.

Policy CS4 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. We would suggest rewording as follows:

~~"3. In edge of centre and out of centre locations, proposals for new retail development and other town centre uses will only be permitted where it can be demonstrated that:~~

- a. There are no more centrally located/sequentially preferable, appropriate sites available for the development
- b. The proposal would not cause significant adverse impact on existing centres
- c. The proposal would not undermine the Council's strategies and proposals for regenerating its centres
- d. The proposal will be readily accessible by public transport and other sustainable transport modes.

In the Resort Core, proposals for leisure, entertainment and tourism development (including tourism-related retailing) will be permitted."

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

**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?**

Blackpool Council Proposed Submission Core Strategy  
Representation Form – July/August 2014

We consider the correct procedures have been followed and it has had regard to the National Planning Policy Framework.

Continue on a separate sheet/exp

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**For official use only**

Ref: CSPA /

## PART B: Core Strategy Representation

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

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

<b>Name:</b>	Nick Laister (RPS)
<b>Organisation</b>	Blackpool Pleasure Beach Ltd

1. To which part of the Proposed Submission Core Strategy does this representation relate?	
<b>Policy Reference</b>	Policy CS5
<b>Section/Paragraph Number</b>	
<b>Map Reference</b>	
<b>Appendix Number</b>	

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

This policy has been substantially improved in line with our previous representations. The purpose of our 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).

We consider the correct procedures have been followed and it has had regard to the National Planning Policy Framework.

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## PART B: Core Strategy Representation

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

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

<b>Name:</b>	Nick Laister (RPS)
<b>Organisation</b>	Blackpool Pleasure Beach Ltd

1. To which part of the Proposed Submission Core Strategy does this representation relate?	
<b>Policy Reference</b>	Policy CS12
<b>Section/Paragraph Number</b>	
<b>Map Reference</b>	
<b>Appendix Number</b>	

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

This policy allows for regeneration and improvement of neighbourhoods in the inner area, which include what is called 'South Beach', which is most of the area between the Pleasure Beach and the junction between Lytham Road and Promenade.

The Council sees these areas as mixed holiday and residential areas, with selective interventions needed by the Council to improve housing stock. The section between Balmoral Road and Withnell Road are defined (via a separate document – the Holiday Accommodation Supplementary Planning Document (SPD)) - as areas where high quality hotel accommodation will be encouraged (see Policy CS23 and the SPD), and there is less flexibility here for introducing residential development, but such development is not ruled out if it forms part of a comprehensive redevelopment.

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This is broadly in line with what we were seeking to achieve, where the areas closest to the Pleasure Beach retained more of a holiday character, with the mixed areas being further north.

We consider the correct procedures have been followed and it has had regard to the National Planning Policy Framework.

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## PART B: Core Strategy Representation

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

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

<b>Name:</b>	Nick Laister (RPS)
<b>Organisation</b>	Blackpool Pleasure Beach Ltd

1. To which part of the Proposed Submission Core Strategy does this representation relate?	
<b>Policy Reference</b>	Policy CS20
<b>Section/Paragraph Number</b>	
<b>Map Reference</b>	
<b>Appendix Number</b>	

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

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**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 checked="" 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.

This policy has developed considerably as the plan has progressed. This Leisure Quarter site was originally earmarked for the regional casino, with supporting conference centre, hotel and retail development. With a regional casino not being taken forward by DCMS, the policy has been redrafted to allow for a comprehensive redevelopment for an undefined **“major leisure development of national importance”**, with complementary uses such as hotel, ancillary retail and parking. Development must include the entire site, but can be phased. There is no detailed guidance, although paragraph 7.25 states: **“Blackpool Council, as a major landowner on the site, will seek to establish a development agreement with other landowners, public sector partners and selected developer(s), to assist with bringing the site forward for development; and will use its compulsory purchase powers to assist with land assembly where required.”**

Given its open and flexible nature, we consider there needs to be additional guidance in the Policy setting out what will not be acceptable on the site. For example, under the current policy it would be possible for a new amusement park to be developed, which could create significant problems for Blackpool Pleasure Beach.

The Pleasure Beach has been operating for well over 100 years and is one of the most famous amusement parks in the UK, being the most popular commercial attraction in Blackpool and a key reason for visiting the town for many people. Although it is a nationally prominent attraction, it is operating in a very difficult environment, where the extensive infrastructure is being maintained and developed against a backdrop of the decline in visitors to Blackpool as a resort. The owners of the Pleasure Beach have been very successful in repositioning the park so that it can continue to attract visitors in large numbers despite the general decline in Blackpool as a whole, with significant investment in park infrastructure, food & beverage offer, park retailing along with the introduction of a large number of high profile new rides and partnerships with international brands. However, despite the successful repositioning of the operation, it remains a vulnerable business, and it is essential that its ability to continue to invest is not undermined by speculative amusement park development elsewhere in the town. In the same way that Blackpool Town Centre is being correctly protected as the main location for major comparison retail development, the Pleasure Beach needs to be protected as the location for major amusement park development.

Given the extent to which Blackpool’s future success depends on the Pleasure Beach being able to continue to invest in new attractions, we consider that this policy needs to make clear that this site should not be a location for a new amusement park. This would be justified by the evidence base in that the Pleasure Beach has provided information about its vulnerability as an attraction in previous representations and this policy, in its new more flexible form, does not reflect this need to protect the Pleasure Beach as one of the biggest drivers of new visitors to the resort.

**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.

The Policy should be reworded as follows:

Policy CS20: Leisure Quarter

1. Comprehensive redevelopment of the entire site will be promoted and encouraged for major leisure development of national significance; where the cumulative impact of a single or group of leisure uses will provide a compelling new reason to visit Blackpool.
2. The development must:
  - a. Demonstrate the highest design quality, through creative architecture, urban design and public realm that creates a landmark attraction which responds to Blackpool's historic townscape and character
  - b. Integrate with and support existing resort core uses and attractions,
  - c. Provide ease of access, good vehicular and public transport connections, quality arrival points and adequate parking facilities (to serve the development and town centre)
  - d. Improve pedestrian permeability by creating strong active connections through the site, and between the site and the town centre, seafront, central corridor and surrounding resort neighbourhoods
  - e. Promote sustainable development through design, access, energy conservation and operational management.
3. Complementary leisure uses, hotel development, ancillary retail, parking and servicing that would add value and support the major leisure development will be permitted, but major comparison retailing or amusement park development will not be permitted.
4. Development proposals may be phased but must not be piecemeal in approach. If all reasonable measures have been taken to redevelop the entire site, and this is not possible, the retention and improvement of existing buildings will be allowed provided the scheme meets the development objectives set out in the supporting Development Brief.

**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?**

We consider the correct procedures have been followed and it has had regard to the National Planning Policy Framework.

Continue on a separate sheet/exp

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## PART B: Core Strategy Representation

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

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

<b>Name:</b>	Nick Laister (RPS)
<b>Organisation</b>	Blackpool Pleasure Beach Ltd

1. To which part of the Proposed Submission Core Strategy does this representation relate?	
<b>Policy Reference</b>	Policy CS21
<b>Section/Paragraph Number</b>	
<b>Map Reference</b>	
<b>Appendix Number</b>	

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

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**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?**

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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?**

This is a general policy for the resort core (which includes the Pleasure Beach), and supports proposals for high quality tourism attractions focused on the town centre and resort core, visitor accommodation, improvement and enhancement of existing attractions, improvement of existing holiday accommodation (outside the defined holiday accommodation areas this can include residential), existing and new event spaces. The Plan will not generally permit new attractions outside of the town centre and resort core.

This policy has been amended following our previous representations and our main concerns have been largely addressed (although please note our objection to paragraphs and policies that undermine Policy CS21, set out in separate representation forms). This is now a much more effective policy that 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

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main holiday accommodation areas.

We consider the correct procedures have been followed and it has had regard to the National Planning Policy Framework.

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## PART B: Core Strategy Representation

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

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

<b>Name:</b>	Nick Laister (RPS)
<b>Organisation</b>	Blackpool Pleasure Beach Ltd

1. To which part of the Proposed Submission Core Strategy does this representation relate?	
<b>Policy Reference</b>	Policy CS22
<b>Section/Paragraph Number</b>	
<b>Map Reference</b>	
<b>Appendix Number</b>	

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

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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.

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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.**

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**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 checked="" 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.

The Council is looking to improve, remodel and environmentally enhance the Central Corridor as the key gateway entrance to the resort. This will include redevelopment of land within and adjoining the Corridor to create more attractive development frontages, improved vehicle, pedestrian and cycle links through the Corridor, improved parking and reception facilities and enhanced landscaping, signage, lighting and security. It is also looking to similarly improve Central Drive, Lytham Road, Dickson Road and Talbot Road as prominent and attractive gateways, which essentially appears to involve a reduction in the number of commercial uses, improved building frontages, better landscaping, etc.

The Council indicates in the policy that it will be prepared to assist in site assembly. In the supporting text it specifically refers to the need to improve that part of the Corridor south of Waterloo Road bridge, which is the area that would have the greatest impact on Blackpool Pleasure Beach.

The Council has made a number of changes to this section as a result of our previous representations. The policy now includes text stating that the arrival experience should be improved and also the encouragement of clear signage for pedestrian routes between car parks and visitor attractions. These amendments are welcomed by Blackpool Pleasure Beach.

We do not, however, consider that the need to protect existing parking levels has been dealt with satisfactorily. Firstly, this matter is relegated to the supporting text (paragraph 7.39). This states: ***“Any change in parking provision as a result of major development must not undermine the resort’s ability to accommodate visitor trips”***.

The major visitor attractions in Blackpool rely on easy access to car parking (and good access from the car parks to the attractions by foot and public transport). This is because the day visitor attraction industry, particularly family attractions, receives the vast majority of its income in a few weeks of the year (which generally coincides with school holidays). During these peak periods, a visitor attraction business needs to be able to accommodate every visitor that wants to visit, as these peak days effectively subsidise the operation for the rest of the year. If access to the main attractions is limited on peak days by the availability of car parking spaces, this could have a very serious impact on the viability of this type of business. The main parking areas are generally at capacity in the peak holiday periods and any loss of capacity would be likely to result in a cap on visitors at peak periods, which would have a potentially very detrimental effect on Blackpool Pleasure Beach and other attraction businesses on the seafront, with very negative consequences for the less busy times of the year.

This matter is often not well understood by councils, who generally consider that it is not necessary to plan car parking for peak periods only. In most industries, for example planning the levels of parking for shopping areas based only on the Christmas peak, this is a reasonable approach, but for businesses which are seasonal and need to meet visitor targets to survive (or at least to continue at their present scale), this approach can have far reaching consequences.

This is a point that Blackpool Pleasure Beach has been consistent about throughout the progression of this Plan. We need to ensure that successive development proposals in the Central Corridor, and elsewhere, do not erode parking supply. The point needs to be made in the policy, not in the supporting text, and it needs to be more unequivocal, as the current statement in paragraph 7.39, does not provide the clarity that is necessary to give the confidence to operators and investors that the existing level of parking will be retained.

**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.

We propose the following amendment to the Policy, which will ensure that the policy reflects the evidence base (i.e. the information provided by Blackpool Pleasure Beach to previous consultations on this issue):

“Policy CS22: Key Resort Gateways

1. Proposals will be promoted and pursued for further improvement, remodelling and environmental enhancement of Central Corridor as a key strategic gateway to Blackpool and attractive point of arrival, including:
  - a. Redevelopment of land within and adjoining the Corridor which creates attractive development frontages viewed from the Corridor;
  - b. Improved vehicular, pedestrian and cycling linkages through the Corridor and extending the network of green infrastructure;
  - c. Improved parking and reception facilities;
  - d. Enhanced landscaping, signage, lighting and security.
2. Proposals for improvement and development will be supported to regenerate Central Drive, Lytham Road, Dickson Road and Talbot Road as prominent and attractive gateways to the resort and town centre, including:
  - a. Replacing existing poor quality, seasonal and transient uses with more viable uses, including quality residential uses on those frontages outside a defined retail centre;
  - b. Improvements to buildings and shop frontages;
  - c. High quality public realm, landscaping, signage, lighting and security;
  - d. Traffic calming and improved public transport, pedestrian and cycling provision.
3. To facilitate major redevelopment schemes assistance will be provided to assemble sites and properties where appropriate.
3. 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.”

**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?**

We consider the correct procedures have been followed and it has had regard to the National Planning Policy Framework.

Continue on a separate sheet/expand box if necessary

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## PART B: Core Strategy Representation

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

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

<b>Name:</b>	Nick Laister (RPS)
<b>Organisation</b>	Blackpool Pleasure Beach Ltd

1. To which part of the Proposed Submission Core Strategy does this representation relate?	
<b>Policy Reference</b>	
<b>Section/Paragraph Number</b>	Paragraph 5.134
<b>Map Reference</b>	
<b>Appendix Number</b>	

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

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

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**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 checked="" 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.

Paragraph 5.134 states:

*“The European Union’s revised Bathing Water Directive (2006/7/EC) came into force in March 2006 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.”*

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. The Plan therefore needs to be updated to reflect the current Regulations and there needs to be a strong statement that the Council will support the utility companies in the carrying out of infrastructure works in Blackpool that will help to meet the requirements of these Regulations.

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.

The Core Strategy will become sound if the paragraph references 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:

*“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 24<sup>th</sup> 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.”*

**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?**

Blackpool Council Proposed Submission Core Strategy  
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We consider the correct procedures have been followed and it has had regard to the National Planning Policy Framework.

Continue on a separate sheet/exp

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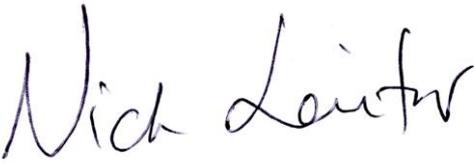
## PART D: Examination in Public

<b>11. Do you wish to express an interest to participate in the Examination?</b>	
Yes, I wish to participate at the oral Examination	<input checked="" type="checkbox"/>
No, I do not wish to participate at the oral Examination	<input type="checkbox"/>
If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary. Only where a modification is sought to the Core Strategy is there a right for the representation to be heard at an Examination hearing session. Please note that the Inspector, not the Council, will decide who should be invited to speak at the Hearing sessions and also which topics are to be covered at them.	
To enable our concerns to be explained in more detail, along with the implications of this Objective remaining in its current form.	
Continue on a separate sheet/expand box if necessary	

<b>Declaration</b>	
I understand that all representations submitted will be made available for public inspection and will be identifiable to my name and organisation (if applicable).	
Signature: 	Date: 22 August 2014

## PART D: Examination in Public

11. Do you wish to express an interest to participate in the Examination?	
Yes, I wish to participate at the oral Examination	<input checked="" type="checkbox"/>
No, I do not wish to participate at the oral Examination	<input type="checkbox"/>
If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary. Only where a modification is sought to the Core Strategy is there a right for the representation to be heard at an Examination hearing session. Please note that the Inspector, not the Council, will decide who should be invited to speak at the Hearing sessions and also which topics are to be covered at them.	
To enable our concerns to be explained in more detail, along with the implications of this Policy remaining in its current form.	
Continue on a separate sheet/expand box if necessary	

Declaration	
I understand that all representations submitted will be made available for public inspection and will be identifiable to my name and organisation (if applicable).	
Signature: 	Date: 22 August 2014