

Blackpool Local Plan Part 1: Core Strategy

Statement of Consultation

April 2014

Blackpool Council



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1 Introduction

1.1 This **Statement of Consultation** accompanies the Local Plan Part 1: Core Strategy Proposed Submission. It sets out the information required under Regulations 17 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and also confirms that consultation on all stages of the Core Strategy to date have been carried out in accordance with the requirements of Blackpool Council's Statement of Community Involvement.

Statement of Community Involvement

1.2 Section 18 of the Planning and Compulsory Purchase Act 2004 requires Council's to prepare a Statement of Community Involvement.

1.3 The Council's Statement of Community Involvement (SCI) was adopted in June 2007 and confirms the Council's commitment to engage with stakeholders and the local community during the plan making process and the methods in which the Council will carry out consultation.

1.4 The SCI has been updated to reflect recent changes to planning consultation legislation and is currently out to consultation alongside the Proposed Submission Core Strategy (www.blackpool.gov.uk/planningconsultations).

The Core Strategy

1.5 The Core Strategy is the key planning document for Blackpool. It sets out where new development for example housing, employment, retail and leisure should be located to meet Blackpool's future needs to 2027. The Strategy also identifies which areas within Blackpool will be regenerated, protected or enhanced and sets out key development principles such as design and affordable housing.

1.6 Preparation of the Core Strategy commenced in 2007. Figure 1 illustrates the preparation stages.

1.7 The Statement of Consultation is organised into the following sections:

Section 2 details the Core Strategy Issues and Options consultation

Section 3 identifies how the Preferred Option was considered

Section 4 details the Core Strategy Preferred Option consultation

Section 5 details the interim housing consultation on The Need for New Homes report

Section 6 details the Revised Preferred Option consultation

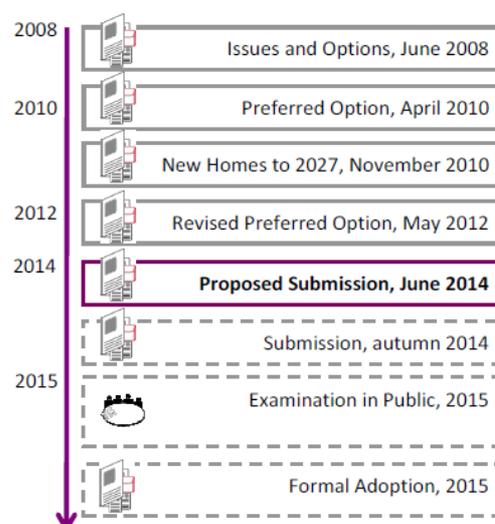


Figure 1: Core Strategy Timeline

1.8 This report focuses on the main Core Strategy public consultation stages. There are a number of detailed committee reports produced at various stages of the plan making process which are separately available in the appendices.

1.9 Separate appendices can be found at the end of the report which provide further details of consultation material and responses.

1.10 This report will be further updated as the Core Strategy progresses to submission stage.

Consultation Stages

1.11 Under what was regulation 25 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008, the Council carried out two series of consultation on the Core Strategy at the 'Issues and Options' and 'Preferred Option' stages.

1.12 In 2012 the Town and Country Planning (Local Planning) (England) Regulations 2012 were published. These superseded the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.

1.13 Consultation on the Revised Preferred Option was carried out under Regulation 18 of the 2012 Regulations which sets out that the local planning authority must invite representations about what the plan ought to contain.

1.14 Under Regulation 19 of the 2012 Regulations, the Council is required to publish the Proposed Submission version of the Plan for consultation. This has been informed by the earlier extensive public participation to ensure that the Core Strategy is to be found 'sound' after the Examination in Public.

1.15 Regulation 22 of the 2012 Regulations requires a summary to be prepared of the main issues raised by the representations to the Proposed Submission. This process should assist local authorities to review the representations and to consider what, if any changes should be made to the Core Strategy before submission. These must be taken into account by the inspector at the examination.

Evidence Base

1.16 Throughout all stages of the Core Strategy, various evidence base documents have been made available for people to view at the Municipal Buildings and on the Council's website. This includes Annual Monitoring reports, Housing Monitoring reports and the Fylde Coast Retail Study. Further information can be found at <http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/Evidence-base.aspx>

Sustainability Appraisal

1.17 The 'Sustainability Appraisal' (SA) is required by Section 19(5) of the Planning and Compulsory Purchase Act 2004.

1.18 The process began in October 2007 with the preparation of an SA Scoping Report for the Blackpool Council LDF as a whole. This set out the geographic scope of the SA, established baseline

information and identified key sustainability issues and opportunities. The sustainability objectives were developed at this stage. The Scoping Report was issued to statutory consultees for the mandatory five-week period. Comments were incorporated into subsequent stages.

1.19 Six alternative Strategic Options for the Core Strategy were developed by Blackpool Council, and set out in the 'Blackpool Core Strategy Issues and Options' report (June 2008). The aim of this document was to determine the most appropriate path for the development of Blackpool, by exploring the complex relationship between growth and regeneration. These were appraised against the SA Framework with the aim of informing the selection of a Preferred Option. The results were presented in an Assessment of Strategic Options Report. This report was also issued for consultation and further comments duly carried forward.

1.20 The appraisal of the Preferred Option for the Core Strategy was presented in an SA Report which assessed the Spatial Vision, Spatial Objectives, Town Centre and Resort Renaissance, M55 Hub Growth Point against various sustainability objectives. This report went out to consultation alongside the Core Strategy Preferred Option.

1.21 A Sustainability Appraisal was carried out on the Revised Preferred Option which appraised the amended Spatial Vision and Objectives along with all the amended policies against the defined sustainability criteria. Some minor amendments were made to the Core strategy as a result of the recommendations of the SA and these can be viewed at <http://www.blackpool.gov.uk/evidencebase>

2 Issues and Options Consultation

2.1 The Core Strategy Issues and Options document was approved by Blackpool Council's Executive Committee in June 2008, and was subject to extensive public consultation from 18th July 2008 until 26th September 2008.

2.2 The document set out:

- The planning context provided by the range of existing local and external strategies which influence Blackpool's future development.
- The detailed "evidence base" comprising various reports and studies which have been completed into different aspects of the current health and character of Blackpool (housing, employment, retail, flood risk, heritage, transport etc).
- A Mini-Spatial profile of the town, identifying the key issues facing Blackpool.
- The Core Strategy Vision and Objectives to address these issues.

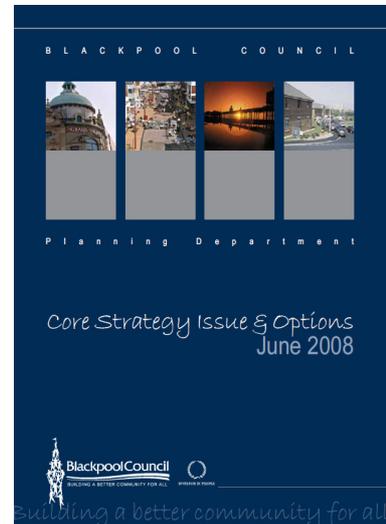


Figure 2: Core Strategy Issues and Options

2.3 A main focus of the Issues and Options document was to set out and consult widely on six broad "spatial options" for Blackpool's future growth and development.

These were:

Urban Concentration/ Intensification targeting growth as far as possible to the existing urban area, and maximising opportunities to re-utilise vacant / underused land.

Inner Area Regeneration looking to target more growth to central Blackpool to assist the regeneration of the town centre and resort core and inner neighbourhoods.

Suburban Expansion looking to what extent there could be wider expansion beyond the existing urban area to develop remaining lands along its eastern boundary.

Marton Moss Urban Extension similarly looking to what extent the town can meet its expansion needs beyond its existing urban area, focusing growth on Marton Moss.

Wider M55 Hub Growth Point looking to what extent housing and employment needs could best be met by wider expansion around the M55 Hub on the edge of Blackpool.

Finally the **Market Driven Approach** informing wider consideration of all the options by assessing what would be likely to happen without a planning framework.

Consultees

2.4 Throughout the preparation of the Core Strategy, a wide range of local and national interest groups and organisations were consulted in accordance with the relevant consultation regulations.

2.5 The Council's Core Strategy consultation database included all the relevant statutory consultees and other non-statutory consultees. Non-statutory consultees included key stakeholders across the Council and key external partners (e.g. Primary Care Trust and Lancashire Police Authority). These organisations or individuals were sent an email notifying them of the consultation and invited them to make comments. This email provided a link to the Council's consultation portal. A letter was sent to all those consultees who did not have an email address. A copy of the letter and email can be viewed in Appendix B.

2.6 In addition, hard copies of the document were sent to all statutory consultees and relevant Government departments.

2.7 A list of the specific and general consultation bodies can be viewed in Appendix A.

Methods of Consultation

Local Press

2.8 A formal notice was published in the Blackpool Gazette. A press release was also prepared.

2.9 Extensive publicity was given to the Issues and Options document in the local press, including a special feature in the Council's own newspaper 'Your Blackpool' which was delivered to all households across the Borough during the consultation period. A copy of the feature can be found in Appendix B.

Website

2.10 Prior to the consultation, information was placed on the Planning Policy webpage of the Council's Website and the Council's Intranet informing council employees and Blackpool residents of the forthcoming consultation arrangements.

2.11 Once the consultation had commenced, the Core Strategy Issues and Options Report was available to view on the Council's website, along with other evidence base documents and the accompanying Sustainability Appraisal.

Library and Council Offices

2.12 The Issues and Options document and accompanying Sustainability Appraisal were made available at the Customer First Centre, other main council offices and all libraries across the Borough. Response forms were also available to complete and return to the Planning Department.

2.13 Hard copies of the Issues and Options Report, Sustainability Appraisal and all other evidence base documents were available on request from the Planning Department.

Presentations

2.14 Presentations were made to various internal council departments and external groups including ReBlackpool – Blackpool’s Urban Regeneration Company, Blackpool Primary Care Trust, Blackpool Senior Voice Forum and Blackpool, Wyre and Fylde LGBT Forum.

Special Area Forums

2.15 Two Special Area Forums were held to focus on more specific local area issues in both the north (Beacon Area Forum) and south (Cherry Tree Area Forum) of the town. Minutes and flyers for these meetings can be found in Appendix B.

Responses to the Consultation

2.16 83 organisations/individuals responded to the Issues and Options consultation and a consultation report was prepared which summarised the responses received and identifies the preferred spatial option. This report can be viewed at Appendix C.

3 Consideration of the Preferred Option

3.1 Following on from the consultation on the Issues and Options, the Planning Department prepared a series reports for the Council's Executive that identified the preferred way forward for the Core Strategy.

Blackpool Core Strategy Preferred Option: Interim Report

3.2 This report was prepared in December 2008 and approved by the Council's Executive Committee in February 2009. It summarised the consultation responses received and identified the preferred way forward for the Core Strategy.

3.3 The Executive resolved that a mix of Options 2, 4 and 5 (Inner Area Regeneration, Marton Moss and wider M55 Hub Growth Point) be approved as the Blackpool Core Strategy Preferred Option, and that this Preferred Option should be the basis for the draft Core Strategy to be prepared for consideration by Executive and for subsequent consultation.

3.4 The Blackpool Preferred Option Interim Report can be found in Appendix D.

Marton Moss and the M55 Hub

3.5 This report was prepared for the Council's Executive Committee on 15th July 2009 to provide further information and clarification on the Marton Moss and M55 Hub proposals in the Core Strategy.

3.6 It set out Blackpool's current housing requirement and the different ways it would be accommodated. This included the potential delivery of houses within the inner areas and the outstanding requirement for new development on the edge of Blackpool.

3.7 The report concluded that Blackpool needed to find land to accommodate 7200 new homes between 2009 and 2026. Site for approximately 2500 new homes had been identified on vacant, derelict and underused land or through property conversions. The Core Strategy was required to identify lands for a further 2000 homes within Inner Blackpool and for 2700 homes on the edge of Blackpool.

3.8 The full report can be found in Appendix D.

Draft Preferred Option

3.9 The draft version of the Core Strategy was presented to Executive Committee on 10th March 2010, with the recommendation that it be approved for public consultation. The Preferred Option was approved for public consultation subject to minor amendments.

3.10 The Executive report can be found in Appendix D.

4 Preferred Option Consultation

4.1 Consultation on the Core Strategy Preferred Option commenced on the 10th May 2010 for a period of 8 weeks until 31st July 2010.

4.2 The Preferred Option identified the preferred way forward for Blackpool, and set out, for consultation, the Council's draft strategic policies accompanied with a Sustainability Appraisal and Habitats Regulation Assessment. The Preferred Option was informed by the previous round of consultation and reports discussed in Section 3.

4.3 Consultation also took place during this period on two draft Supplementary Planning Documents (SPDs) providing more detailed guidance in support of evolving Core Strategy policy:

- New Homes from Old Places SPD – guidance on residential conversions
- Holiday Accommodation SPD – guidance on revised holiday accommodation areas.

(Further information on the two SPDs can be found at www.blackpool.gov.uk/holidayaccommodation and www.blackpool.gov.uk/residentialconversions.)

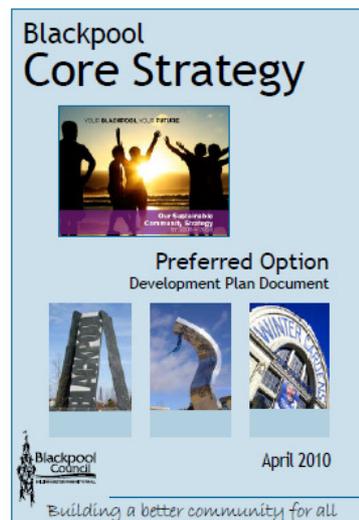


Figure 3: Preferred Option



NEW HOMES FROM OLD PLACES
Draft Residential Conversion and Sub-division Supplementary Planning Document
May 2010
Blackpool Council



Figure 4: Draft Residential Conversion and Holiday Accommodation SPDs

Consultees

4.4 Throughout the preparation of the Core Strategy, a wide range of local and national interest groups and organisations were consulted in accordance with the relevant consultation regulations.

4.5 The Council's Core Strategy consultation database was updated to include all statutory and other non-statutory consultees and all those that had commented on the previous stage of the Core Strategy. Non-statutory consultees included key stakeholders across the Council and key external partners. These organisations or individuals were sent an email notifying them of the consultation and inviting them to make comments. This email provided a link to associated documents and an online version of the comments form. A letter was sent to all those consultees who did not have an email address. A copy of the letter and email can be viewed in Appendix E.

4.6 In addition, hard copies of the document and a covering letter were sent to all statutory consultees and relevant Government departments.

4.7 A list of the specific and general consultation bodies can be viewed in Appendix A.

Methods of consultation

Local Press

4.8 A formal notice was published in the Blackpool Gazette on Monday 10th May 2010. A press release was also prepared. These can be viewed at Appendix E.

4.9 Extensive publicity was given to the Preferred Option and the accompanying Draft SPDs in the local press which generated a series of articles, correspondence and debate onwards from the time of the original council approval in March to the end of the consultation process. Example copies of some of this coverage are included in Appendix E. A special feature was included in the Council's own newspaper 'Your Blackpool' which was delivered to all households across the Borough during the consultation period. A copy of the article can be found in Appendix E.

Website

4.10 Prior to the consultation, information was placed on the Core Strategy webpage of the Blackpool Council website informing Council employees and Blackpool residents of the forthcoming consultation arrangements.

4.11 Once the consultation had commenced, the Core Strategy Preferred Option was available to view on the Council's website, along with the Sustainability Appraisal and other evidence base documents, including Housing Monitoring Report, SHLAA and Employment Land Review.

Library and Council Offices

4.12 The Preferred Option and accompanying Sustainability Appraisal were made available at the Customer First Centre, other main Council Offices and all libraries across the Borough. Comments forms were also available to complete and return to the Planning Department.

4.13 Hard copies of the Preferred Option, Sustainability Appraisal and all other evidence base documents were also available on request from the Planning Department.

Leaflets

4.14 Three different leaflets were prepared to provide an 'easy to read' summary of the Core Strategy main issues:

- General Core Strategy Leaflet
- Holiday Accommodation Leaflet
- Marton Moss/M55 Hub Leaflet

4.15 These were made available at the libraries, public exhibitions and at the Area Forums. The leaflets were also used to advertise the drop in consultation events. The Holiday Accommodation leaflet included the dates and locations of the six public exhibitions (discussed below) and were delivered to all households and commercial properties within Blackpool's resort neighbourhoods. The Marton Moss leaflet provided information on both the drop in event and the Cherry Tree Area Forum (both discussed below) and was delivered to all households and commercial properties on Marton Moss (Distribution areas can be found in Appendix E).

4.16 Copies of the leaflets can be found in Appendix E.

Public Exhibitions

4.17 Six individual public exhibitions were held across Blackpool's Resort Neighbourhoods. Details and summaries of these events can be found in Appendix F. Display boards were used to illustrate the Core Strategy process, proposed vision and topic areas. The exhibitions also provided information on the draft Holiday Accommodation SPD and draft Residential Conversions SPD.

4.18 A number of officers from Council Departments and Re-Blackpool were present at each exhibition, to present a joined-up approach and be on hand to answer any queries or concerns. The Council's Housing Enforcement, Planning Enforcement and Visitor Accommodation Accreditation Teams were all represented.

4.19 People who attended the event were encouraged to complete a questionnaire which asked questions about the exhibition boards. Summaries of the public exhibitions can be found in Appendix F. In total, the events were attended by 275 people.



Figure 5: Lord Street Public Exhibition

Exhibition Dates

See and discuss the proposals at exhibitions in your area:

<p>South Beach: 7th June 2010 St Peter's Church, Lytham Road</p>	<p>Norbreck, Bispham and North Shore Cliffs: 21st June 2010 The Savoy Hotel, Queens Promenade</p>
<p>Pleasure Beach: 10th June 2010 Holy Trinity Church, Dean Street</p>	<p>North of the Town Centre: 24th June 2010 Claremont First Steps Centre, Dickson Road</p>
<p>Foxhall & Central Promenade: 14th June 2010 Blackpool Philharmonic Club, Foxhall Road</p>	<p>South of Town Centre: 28th June 2010 St John's Conference Centre, Cedar Square</p>

All exhibitions run 2-8 pm

Figure 6: Public Drop-In Exhibition Dates and Locations

4.20 A seventh drop-in consultation was held specifically dealing with the Core Strategy housing proposals at Marton Moss and the M55 Hub. The event took place at Our Lady of the Assumption Church Hall close to Marton Moss. Unfortunately, attendance to this particular event was low and it is believed that the distribution company employed by the Council failed to deliver all the leaflets advertising the event. However, the Cherry Tree Area Forum provided another opportunity for Marton Moss residents to get involved in the Core Strategy consultation. A leaflet was sent out to all residents of the Clifton, Hawes Side and Stanley Wards advertising the Area Forum (see Appendix E). Further details of the Area Forums can be found in the next paragraph.

Area Forums

4.21 Officers from the Planning Department attended seven Area Forums across Blackpool to provide information on the Core Strategy Preferred Option. Exhibition boards exhibitions were displayed alongside the relevant questionnaire and response forms at the Area Forum 'marketplace'. Detailed presentations on the Core Strategy Preferred Option were made at three of the area forums. Cherry Tree Area Forum focussed on the proposals for Marton Moss/M55 Hub where the Core Strategy was the major item on the agenda and focus of the meeting, followed by a Planning Officer's question and answer session from residents and Ward Councillors. Revoe and Gateway Area Forum focussed on the Holiday Accommodation Areas and consisted of a presentation and a question and answer session.



Figure 7: Cherry Tree Area Forum 'Market Place'

4.22 Further details and minutes from the Area Forums can be found in Appendix E.

Area Forum	Wards Covered			Date	Meeting Format	Presentation
Sandhurst	Anchorsholme	Bispham	Norbreck	05/7/10	Marketplace	-
Parklands	Layton	Park	Marton	12/7/10	Marketplace	-
Revoe	Bloomfield	Tyldesley	Victoria	13/7/10	Presentation	Hol Accommm
Cherry Tree	Hawes Side	Clifton	Stanley	14/7/10	Presentation	Moss/Hub
Beacon	Ingthorpe	Greenlands	Warbreck	19/7/10	Marketplace	-
Thames	Squires Gate	Waterloo	Highfield	20/7/10	Marketplace	-
Gateway	Claremont	Brunswick	Talbot	21/7/10	Presentation	Hol Accommm

Figure 8: Area Forum Details

Responses to the Consultation

4.23 60 organisations/individuals formally responded to the Preferred Option Consultation (see Appendix F). The Schedule of Representations along with the Council's response and amendments made to the Plan as a result of the representations can be found in Appendix F. In addition, 93 Core Strategy questionnaires were completed following on from the public exhibitions. There were also 10 specific Marton Moss/M55 Hub Questionnaires completed relating to the Marton Moss public exhibition and 192 specific responses relating to the Holiday Accommodation SPD. Summaries of the events and Core Strategy questionnaire responses can be found in Appendix F.

5 Interim Housing Consultation: The Need for New Homes

5.1 In response to all the consultation representations received at the Preferred Option stage and in light of the impending revocation of all Regional Spatial Strategies specifically the regional housing figures, Blackpool Council prepared a new report setting out proposed new housing requirements for Blackpool to 2027.

5.2 Key changes included:

- To no longer propose to allocate for residential development:
 - Lands between Progress Way & School Road
 - Land at Whyndyke Farm
- To no longer propose an extension to the Green Belt south of School Road, with very restrictive policies on any future development.
- To instead safeguard the open character of all the lands south of Progress Way with some limited relaxation of policy.
- To reflect planning permission granted for land at Moss House Road

5.3 Consultation on The Need for New Homes commenced on the 8th November 2010 and lasted for a period of 4 weeks until 6th December 2010.

5.4 The Report can be found at <http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Documents/Need-for-New-Homes.pdf>

Consultees

5.5 Throughout the preparation of the Core Strategy, a wide range of local and national interest groups and organisations were consulted in accordance with the relevant consultation regulations.

5.6 The Council's Core Strategy consultation database was updated to include all statutory and other non-statutory consultees and all those that had commented on the previous stages of the Core Strategy. Non-statutory consultees included key stakeholders across the Council and key external partners. These organisations or individuals were sent an email notifying them of the consultation and inviting them to make comments. This email provided a link to associated documents and an online version of the comments form. A letter was sent to all those consultees who did not have an email address. A copy of the letter and email can be viewed in Appendix G.

5.7 A list of the specific and general consultation bodies can be viewed in Appendix A.

Residents of Marton Moss

5.8 All residents of Marton Moss directly affected by the revised proposals were sent a letter, questionnaire and summary sheet informing them of the report and the consultation period.

5.9 A map of the areas where letters were sent, an example letter, summary sheet and questionnaire can be found in Appendix G.

Methods of Consultation

Website

5.10 Information was placed on the Core Strategy webpage the Council's website informing Council Staff and Blackpool residents of consultation. Links were available to the full report, summary map and information and questionnaire.

Library and Council Offices

5.11 The report, summary and accompanying comments forms were available at the Customer First Centre and Palatine Library (the closest library to the Marton Moss area) during the consultation period.

Responses to the Consultation

5.13 78 organisations/individuals responded to the interim housing consultation (see Appendix H). The Schedule of Representations along with the Council's comments and amendments made to the Plan as a result of the representations can be found in Appendix H.

6 Revised Preferred Option Consultation

6.1 Consultation on the Core Strategy Revised Preferred Option commenced on the 7th June 2012 for six weeks until 20th July 2012.

6.2 The need for changes to the Core Strategy document since the Preferred Option consultation in 2010 had arisen from:

- Responding to representations received to the previous Core Strategy consultations.
- The new localism agenda, including the localism act, pending abolition of RSS and publication of the NPPF.
- New updated evidence base
- A review of Blackpool Council's corporate priorities

6.3 Consultation also took place during this period on a draft Affordable Housing Supplementary Planning Document (SPD) providing more detailed guidance in support of emerging Core Strategy affordable housing policy. Separate consultation statements and further information on the Affordable Housing SPD can be found at www.blackpool.gov.uk/affordablehousing

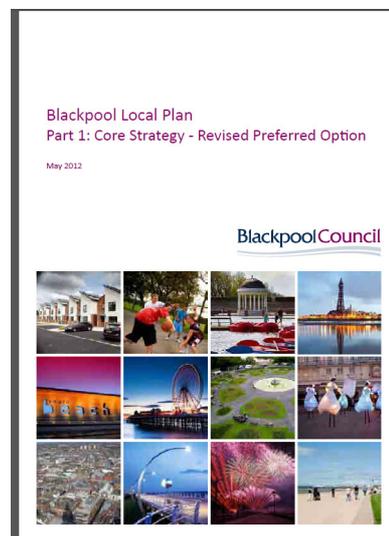


Figure 9: Revised Preferred Option

Consultees

6.4 As per previous rounds of consultation, many local and national interest groups and organisations were consulted in accordance with the Government Regulations.

6.5 The Council's Core Strategy consultation database was updated to include all statutory and other non-statutory consultees and all those that had commented on the previous stages of the Core Strategy. Non-statutory consultees included key stakeholders across the Council and key external partners. These organisations or individuals were sent an email notifying them of the consultation and inviting them to make comments. This email provided a link to associated documents and an online version of the comments form. A letter was sent to all those consultees who did not have an email address. A copy of the letter and email can be viewed in Appendix I.

6.6 A list of the specific and general consultation bodies can be viewed in Appendix A.

Methods of Consultation

Local Press

6.7 A formal notice was published in the Blackpool Reporter on 7th June 2012. A press release was also prepared. These can be viewed at Appendix I.

6.8 Extensive publicity was given to the Revised Preferred Option in the local press with a number of articles being published in the Blackpool Gazette. These articles are included in Appendix I.

Website

6.9 Once consultation had commenced, the Revised Preferred Option was available to view on the Council's website, along with the Sustainability Appraisal, Habitats Regulations Assessment and other evidence base documents, including the Housing Monitoring Report, SHLAA and Employment Land Review.

6.10 The Revised Preferred Option consultation was given prominence of the front page of the Council's website as a 'Hot Topic' with a direct link to the Core Strategy webpage.

Library and Council Offices

6.11 The Revised Preferred Option, accompanying Sustainability Appraisal and response forms were available at the Customer First Centre and all libraries across the Borough along with the response forms.

6.12 Hard copies of the Revised Preferred Option, Sustainability Appraisal and all other evidence base documents were available on request from the Planning Department.

Twitter

6.13 'Tweets' were sent out regularly throughout the consultation period, reminding followers of the Blackpool Council Twitter page of the current Core Strategy consultation with a link to the Core Strategy webpage.

Marton Moss Drop In Event

6.14 Due to the nature of changes to the Marton Moss policy within the Core Strategy, it was considered a public 'drop-in' event would be necessary in providing Marton Moss residents, businesses and other interested parties the opportunity to find out more information about the revised proposals for the area.

6.15 The exhibition was held on Thursday 5th July 2012 - 2pm-8pm at South Shore Lawn Tennis Club. Display boards were used to illustrate the Core Strategy and the proposed neighbourhood planning approach (see Appendix I). A total of 216 people attended the event.

6.16 Those who attended the event were encouraged to complete a comments form (see Appendix I).



Figure 10: Marton Moss Drop In Exhibition

Area Forums

6.17 Officers from the Development Plans Team attended seven Area Forums across Blackpool to provide information on the Revised Preferred Option. Exhibition boards were displayed alongside response forms at the Area Forum ‘marketplace’. At the Gateway Area Forum, the Head of Development Plans provided an overview of the Core Strategy and was available to answer any questions.

Area Forum	Wards Covered				Date
Sandhurst	Anchorsholme	Bispham	Norbreck		11 th July 12
Parklands	Layton		Park		16 th July 12
Revoe	Bloomfield	Waterloo	Victoria		17 th July 12
Cherry Tree	Hawes Side	Clifton	Marton		18 th July 12
Beacon	Ingthorpe	Greenlands	Warbreck		10 th July 12
South Shore	Squires Gate	Stanley	Highfield		23 rd July 12
The Gateway	Claremont	Brunswick	Talbot	Tyldesley	12 th July 12

Figure 11: Area Forum Details

Responses to the Consultation

6.18 In total, 82 organisations/individuals responded to the Revised Preferred Option consultation (see Appendix J). Of these 82, there were 34 responses made directly as a result of the Marton Moss ‘Drop In’ Event. The Schedule of Representations along with Council’s response and amendments made to the Plan as a result of the representations can be found in Appendix J.

Appendix A – Core Strategy: List of Specific and General Consultees

Specific / Statutory Consultees		
Government Office North West (Closed March 2011)	National Grid Land & Development	T-Mobile
Lancashire County Council	Coal Authority	Vodafone
Fylde Borough Council	Environment Agency	Hutchinson 3G UK Limited (Three)
Wyre Borough Council	English Heritage	Mobile Operators Association
Preston City Council	Natural England	Orange
St Anne's Parish Council	Highways Agency	O2
Westby with Plumpton Parish Council	Network Rail	BT Group Plc, Regional Manager North West
Staining Parish Council	NHS Blackpool (Formerly PCT) (ceased to exist March 2013)	Mono Consultants Limited
	NHS North Lancashire (Formerly PCT) (ceased to exist March 2013)	Patrick Farfan Associates
Lancashire Police Authority (ceased to exist November 2012)	North West Strategic Health Authority (ceased to exist March 2013)	British Gas Properties
NWDA (Abolished March 2012)	Marine Management Organisation (Statutory Consultee from April 2012)	Electricity North West
North West Regional Assembly (Abolished July 2008)	Department For Transport	United Utilities
Homes and Communities Agency (Statutory Consultee from April 2009)		
General / Non-Statutory Consultees		
Elected Representatives	Different Religious Groups	Council Officers
Blackpool North MP	Faith Forum	Senior Management, Blackpool Council
Blackpool South MP	Blackpool Congregations of Jehovah's Witnesses	Planning Staff, Blackpool Council
European MPs		LSP Members (via Partnership Delivery Officer)
Blackpool Councillors		

Bodies representing Disabled People	Youth Groups, Schools, Colleges	CL Edwards & Sons Ltd
Fylde & Wyre Society for the Blind	Blackpool Young People's Council & Blackpool Voice	Blackpool Licensed Taxi Operators Assoc.
Motor Nuerone Equalities Forum	Blackpool & Fylde College	Campaign for Real Ale (CAMRA)
Leonard Cheshire North West Region	Blackpool Sixth Form College	Lancashire Fire & Rescue Service HQ
Princess Alexandra Home for the Blind	Blackpool Scouts Service Team	Tesco
Blackpool Society for Mentally Handicapped	Revoe Community Primary School	Royal Mail Group Plc
Blackpool Fylde & Wyre Mind		Department For Constitutional Affairs
Deaf Society	Local Businesses / Business Groups	Public Sector Manager Ubiquis
Fibromyalgia Support Group	Business Link Lancashire	Relate Lancashire
RNIB	Federation of Small Businesses	Blackpool Civic Trust
	Lancashire Economic Partnership	Blackpool Combined Association
Voluntary Bodies	Blackpool Self-Catering Association	Blackpool Connexions
Council for Voluntary Service	StayBlackpool	Morrison Supermarkets PLC
Barnardos Blackpool Project	Lancashire and Blackpool Tourist Board	Noble Organisation
Blackpool SURF	Blackpool Fylde & Wyre Trades Union Council	Warburtons Fylde Ltd
Community Futures	North & Western Lancashire Chamber of Commerce	C Cabs
Blackpool Friends of Kingscote Park	The Mersey Partnership	Moorland Motors Ltd
Blackpool & Fylde Rail Users' Association	Blackpool Bids	Seafood Restaurant
Friends of the Grand	Town Centre Manager	Bestplate Ltd
	Dale Street Market Manager	Chelsom Ltd
Public Transport Operators	Blackpool Chamber of Trade	Gilberts (Blackpool) Ltd
Blackpool Transport Services Ltd	Blackpool Major Retailers Consortium	Blackpool Moneyline IPS Ltd
First North Western	Citizens Advice Bureau	Advice Link
Northern Rail	Blackpool Airport	Bourne Leisure
Virgin Trains (North West Region)	RealTimeUK North	Blackpool Football Club
	King Street Dental Surgery	Job Centre Plus Blackpool
	In the Pink Leisure	Blackpool Airport

Evening Gazette	Blackpool & Fylde Friends of the Earth
ReBlackpool URC	Fylde Coast Bridleways Assoc.
Martin Yates Independent Living Services	Fylde Coast Cycling Action Group
Blackpool Pleasure Beach	Ramblers Association
Leisure Parcs	RSPB
Carers UK	Sport England
Beneast Training Ltd	
Progress Recruitment	Government Departments
	DEFRA
Conservation, Preservation & Amenity	
Civic Trust Regeneration Unit	Other
CPRE Lancashire Branch	Lancashire Constabulary
Council for the Protection of Rural England	
Lancashire Wildlife Trust	
RSPB	
National Playing Fields Association	
Sustainability North West (SNW)	
Theatres Trust	
The Woodland Trust	
Conservation Officer Lancashire Wildlife Trust	
Fylde Bird Club	
Blackpool Environmental Action Team (BEAT)	
Blackpool & Fylde Conservation Volunteers	

Appendix B - Issues and Options: Consultation Material

Letter sent to consultees – 18th July 2008

18th July 2008

Our Ref: GP
Your Ref:
Enquiries to: Mr Page
Direct line: (01253)
476241

Dear Sir/ Madam,

BLACKPOOL CORE STRATEGY ISSUES AND OPTIONS

Your views are invited on the Blackpool Core Strategy Issues and Options document. The Core Strategy is where key strategic decisions will be made about Blackpool's future development.

The document sets out **6 alternative “spatial options”**, each setting out different approaches to Blackpool's future growth and development to 2025.

Issues are also raised in the document about the future of the resort and town centre, including the Central Station site, Winter Gardens and holiday accommodation areas. Other key questions are raised on transport, employment and other community development issues.

A core requirement is for new sites to be identified to meet the need for around 7,500 new dwellings 2008-2025, together with more employment land and a range of other new facilities. Some new development will inevitably now be needed on the edge of Blackpool. The challenge for the Core Strategy is to determine the best way forward, and where new development should best be located.

The current housing market downturn will clearly have an effect on how much new housing gets built in the short term, but the Core Strategy is looking ahead to 2025 and beyond. This consultation is not so much about the pace of growth, but about the *direction of Blackpool's future growth*.

Please take this opportunity to influence the way forward and let us know your views. In outline, the 6 Spatial Options are:

Urban Concentration/ Intensification seeks to intensify growth across the existing urban area.

Inner Area Regeneration looks to target more regeneration to central Blackpool and the resort core.

Suburban Expansion looks at remaining lands along Blackpool's eastern boundary.

Marton Moss Urban Extension concentrates most suburban growth in this one main location.

M55 Hub Growth Point looks at a wider focus for expansion around the M55 junction hub on the edge of Blackpool.

A Market Driven Approach assesses what would be likely to happen without a planning framework.

Finally, the public are asked if there are **any other options** they would wish to put forward to meet Blackpool's identified development needs.

Please also answer as many of the other questions on Blackpool's future raised in the document as you are interested in.

The consultation period is for 10 weeks from July 18th to Friday 26th September

You can view and download the Core Strategy Issues and options, and supporting documents online on the Council's website at

<http://www.blackpool.gov.uk/Services/G-L/LocalDevelopmentFramework/Home.htm>

You can also make comments on the documents online using our new consultation portal. You must first register your details, you will then be sent a username and password to access the site and make your comments. Once registered, you will be informed by email of future consultations on new planning documents produced by the Council. You can access the Portal using the following link:

<http://consult.blackpool.gov.uk/portal>

The documents will also be available to view throughout the consultation period during normal opening hours at the following locations:

- Customer First, Municipal Buildings, Corporation Street
- Westgate House, Squires Gate Lane
- Progress House (Main Reception), Clifton Road
- All libraries in the Borough

This is your opportunity to comment on the document and the issues it raises for Blackpool.

Please let us know your views. If you have any questions about the Core Strategy, you can contact, e mail or telephone me at the address above.

Yours Faithfully,

Graham Page (Core Strategy Manager)

Email sent to consultees – 18th July 2008

Dear xxxxxxxx

The Core Strategy Issues & Options Consultation will be available within the following dates:

Start date: 18/07/08 10:00:00 BST

End date: 26/09/08 17:00:00 BST

You may view the event here:

<http://consult.blackpool.gov.uk/portal/planning/cs/csioc>



For Office Use			
Ref No.		Comment No.	
Date Rec.		Acknowledged	

ISSUES AND OPTIONS CONSULTATION

Comments Form : Consultation closes September 26th 2008

- The best way to submit comments is to Register to make use of the Council's new online Consultation Portal by visiting the following website and entering your details: <http://consult.blackpool.gov.uk/portal>.
- You can also print a copy of the Issues and Options Report, answer the questions using the spaces provided in the document, and return by post.
- Alternatively, please use this form to comment on any particular aspects of the Core Strategy Issues and Options.
- Please indicate on the form precisely which question you are commenting on (as set out in the consultation document), and make separate comments for each question you respond to. *Answer as few or as many questions as you are interested in.*
- You may photocopy this form, obtain further copies free of charge from the Council, or print off from the Council's website (<http://www.blackpool.gov.uk/Services/GL/LocalDevelopmentFramework>).

SECTION 1: Respondent Details

Name

Address

Postcode

Telephone

If you are completing this form on behalf of someone please complete section 2, otherwise go to section 3

Make as many copies of this sheet as required (use one per question) and attach to the front sheet Sections 1 & 2.

NOTE. Any representation received will be a public document, with details stored on a database, and made available for inspection at the Council's office and via the Council web site.

Signature:	Date:
------------	-------

If you require any further assistance to complete this form please phone: (01253) 476241.

**Please sign and date each form you complete and return them to:
Planning Department, Blackpool Borough Council, PO Box 17, Corporation Street, Blackpool,
FY1 1LZ, before 5.00pm on Friday 26th September 2008.**

Press Release 29th May 2008

Blackpool Core Strategy

The Way Forward for the Town's Development to 2025

The Blackpool Core Strategy will have major implications for Blackpool's future development. It sets out the key strategic development choices which face the town – it is about where and how to meet Blackpool's future housing, town centre, resort and other development needs for the next 20 years and beyond.

The Issues and Options Document is the first stage in this process, and its crucial aim is to raise wide discussion of the alternatives. Results of the consultation will then inform the choice of a "Preferred Option" later this year.

The report sets out six broad spatial options for Blackpool's regeneration and growth – each illustrated on a plan. All seek to balance inner area regeneration with new growth on the edge of Blackpool, including Marton Moss and around the M55.

The Document also asks a range of more specific issues under a number of key themes as to what kind of place, resort and town centre Blackpool will become. The future of the New Bonny Street development site, the Winter Gardens, and the resort's holiday accommodation sector are all key issues on which views are invited.

Portfolio Holder for Tourism and Regeneration, Maxine Callow, says "The Core Strategy Issues and Options consultation will be of crucial importance in shaping the way forward towards a shared understanding and commitment to Blackpool's wider regeneration. The Council will be making strenuous efforts to draw these important development decisions to the public's attention and we want to hear everyone's views".

Consultation will take place for 6 weeks later in June/ July. The results of the consultation on the Issues and Options Document will be considered by the Council and by the end of the year the Council will need to come forward with its "Preferred Option" for Blackpool's future growth and development.

(For further information on the Core Strategy Issues and Options phone Graham Page (01253 476241) or) you can also view the Core Strategy Issues and Options on www.blackpool.gov.uk under Planning (Local Plans) on the A-Z index.

Ends

Have your say on future development

Where should 7,500 new homes be built?

What future for the former Central Station site and the Winter Gardens?

Which holiday areas can still succeed and which must change?

Over the next 20 years 7,500 homes, 40 hectares of employment land, and a range of other facilities need to be developed to meet Blackpool's needs.

Blackpool residents are invited to have their say on the Blackpool Core Strategy Issues and Options Report, with the closing date for responses on 26 September.

The document was approved by the Council in June and has been informed by a wide range of technical assessments which have been made on the current health and character of the town.

If you wish to influence the way forward, you need to make your views known. There are issues of general interest to all residents of the town affecting the town centre and the resort – and the Core Strategy will determine the way forward to build thousands of new homes which could affect the area of Blackpool where you live.

Whether you object to or support the options for development – the Council want to know.

Where should more houses be built?

Blackpool is required to provide sites for around 7,500 new homes between now and 2025 in order to meet Government housing growth targets. Development will be undertaken to revitalise the inner areas and build on brownfield sites, but many new homes will also need to be provided on the edge of the town.

The Core Strategy looks ahead to 2025 and beyond, and this consultation is more about where, rather than when, new housing should be developed.

Choices need to be made

There are six options outlined for this growth which can be seen on the map.

Many will support the Council's ambitions to target more growth to central Blackpool, and the Council is actively seeking public funding to maximise regeneration. However, it has to be recognised that the scale of funding likely to become available will be limited and cannot magically sweep away problems and redevelop wide area of the town. Against the level of new housing required it is

estimated that around two thirds (5,000) of the 7,500 dwellings will need to be provided on new sites on the edge of Blackpool.

The options put forward all include a significant focus on inner area regeneration, and a significant level of new housing on Marton Moss.

However, there are real choices which need to be made between the six options shown on the plan which focus very different approaches to where new development should be located.

The Future of the Resort and Town Centre.

Key issues which will help shape the future of the resort and town centre are also a crucial part of the consultation. Among the issues raised in the document are:

- The future of the Winter Gardens, with alternatives including whether the venue should be converted for shopping, casino, hotel or museum use.
- The future of the former Central Station site including whether it should be developed for a conference centre, shopping, a major new tourism attraction, hotels, or retained for parking.
- Slimming the Promenade down from four lanes to two in the town centre.
- Whether there is support for full university status for Blackpool?
- Where should be the focus of an improved holiday accommodation sector?

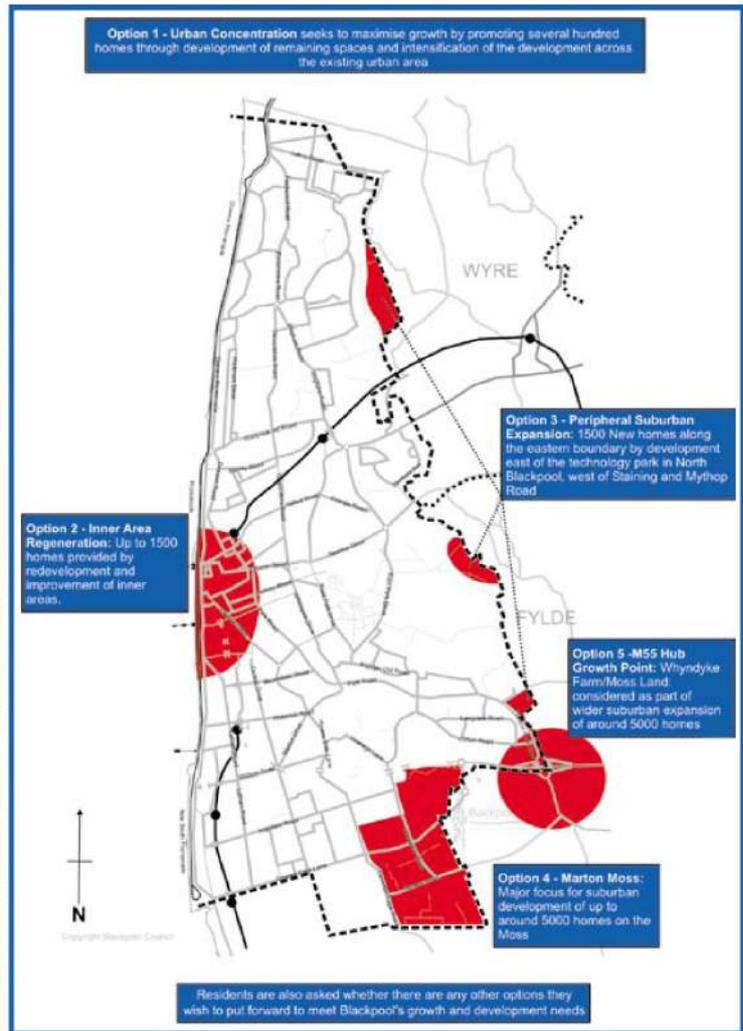
How to be involved

Online

You can view and download the Core Strategy Issues and options on the Council's website at:

www.blackpool.gov.uk/Services/G-L/LocalDevelopmentFramework/Home.htm

You can also make comments on the documents online using the Council's new consultation



portal at <http://consult.blackpool.gov.uk/portal>

The documents are also available to view at main Council offices and all libraries in the borough.

At Area Forums

Two Special Area Forum Meetings have been arranged to discuss the implications of the Core Strategy and how this might affect local areas of Blackpool.

Monday 21 September, Bispham High School / Arts College, Bispham Road – 7pm

One option includes lands east of Faraday Way and Robins Lane in north east Blackpool. There are key issues of interest to residents about the future development of the town centre, the resort and the Bispham College site.

Tuesday 22 September - Highfield Humanities College, Lindale

Gardens entrance – 6.30pm

Much of the focus for new homes and employment land is on development on Marton Moss, Whyndyke Farm and west of Staining and a meeting of the Cherry Tree Area Forum, to which residents of Parklands are also invited, will take place on Tuesday 22 September.

Your chance to have your views heard!

CHERRY TREE AREA FORUM

Do you want to know more about how Blackpool will develop over the next 20 years, and how this may directly affect you and your local area?

Over the next 20 years 7,500 new homes, 40 hectares of employment land and a range of other new facilities to meet the need of local communities will need to be developed. There are 6 options outlined for this growth. This includes major potential new areas of development on Marton Moss, Whyndyke Farm, and west of Staining in the area where you currently live.

If you want to find out more about how this may affect you, then come along to:

Highfield Humanities College, Lindale Gardens entrance on Tuesday 22nd September from 6.30pm.

Your chance to have your views heard!

BEACON AREA FORUM

Do you want to know more about how Blackpool will develop over the next 20 years, and how this may directly affect you and your local area?

Over the next 20 years 7,500 new homes, 40 hectares of employment land and a range of other new facilities to meet the need of local communities will need to be development. There are 6 options outlined for this growth. This includes for development east of Faraday Way and Robins Lane close to where you currently live. There are also key issues of interest to all residents about the future development of the town centre, the resort and the Bispham College site.

If you want to find out more about how this may affect you, then come along to:

Bispham High School / Arts College, Bispham Road, on Monday 21st September from 7.00pm.

Your chance to have your views heard!

**BLACKPOOL COUNCIL REPORT of the
HEAD OF LEGAL AND DEMOCRATIC SERVICES
to BEACON AREA PANEL**

BEACON AREA FORUM MEETING HELD ON MONDAY 22ND SEPTEMBER 2008

1. Introduction

The Chairman of the Area Forum and Ward Councillor for Greenlands Ward, Councillor Julian Mineur welcomed members of the community to a Special Area Forum on the Core Strategy Issues and Options Consultation Document. He explained that in addition to the scheduled Area Forum meetings there was the opportunity to hold additional Special Area Forums on key issues or to respond to time bound consultations.

2. Context

The Core Strategy Issues and Options was the document in which the key strategic decisions would be made about Blackpool's future development. The document acts as the land use, or spatial expression of the Council's wider Sustainable Community Strategy which seeks to create a framework for a more prosperous and healthier Blackpool.

In particular it would explain how the proposed levels of employment and housing growth would be accommodated and how other retail, resort and wider development needs may be met in the next 15 – 20 years.

It was noted that the next stage of the consultation was to determine the Preferred Option for Blackpool's future development. Following this a final submission version will be submitted to the Government in 2009 for examination, with adoption of the new Blackpool Core Strategy in 2010.

As part of a Borough wide consultation, it had been agreed by Beacon Area Panel that due to one of the proposed spatial options for development being situated in Ingthorpe Ward, it would be appropriate to seek the views of residents within the area through the Special Area Forum Process.

3. Theme

Mr G Page, Group Planning Officer highlighted the key issues facing the future development of Blackpool. He explained that central to the Core Strategy Issues and Options document was the provision for 7,500 new homes and 40 hectares of employment land by 2025.

These included:

- Population and Housing – to address housing market imbalances and revive the inner areas whilst providing a wider mix.
- Employment – to diversify the economy by provision of quality opportunities for new development to provide more and better paid jobs.

- Resort – to sustain a more all year round visitor market and provide new high quality attractions and improved accommodation to revitalise the visitor economy.
- Town Centre – to make the town centre more the heart of the Fylde Coast urban area, transforming its offer, environment and supporting facilities.
- Built Environment – to address the poor quality of the urban environment, making better places and spaces.
- Community and Services – to develop sustainable, safe and healthy neighbourhoods with a diverse range of services.
- Natural Environment – to balance the requirement for new development with environmental interests.
- Transport and Travel – to make a better connected Blackpool with easy access to jobs and local services and new developments well served by sustainable modes of transport.

Blackpool, unlike some neighbouring boroughs was noted to be one single urban area and not a series of smaller settlements and in planning terms this restricted the number of areas in which the required building works could take place.

Six spatial options had been proposed as part of the Core Strategy Issues and Options Document and these were outlined as follows:

- Urban Concentration / Intensification – seeks to target growth as far as possible to the existing urban area and maximise opportunities to re-utilise any vacant or underused land.
- Inner Area Regeneration – looks to target more growth to central Blackpool to assist the regeneration of the town centre and resort core and inner neighbourhoods.
- Suburban Expansion – looks to what extent there could be wider expansion beyond the existing urban area to develop remaining lands along its eastern boundary between Blackpool and Carleton, Blackpool and Staining and in South East Blackpool.
- Marton Moss Urban Extension – similarly looks to what extent the town can meet its expansion needs beyond its existing urban area, but more singularly focusing growth on Marton Moss.
- Wider M55 Hub Growth Point – looks (in conjunction with the choices set out in the Fylde Core Strategy Issues and Options Report) to what extent Blackpool and Fylde's respective housing and employment needs could best be met by a wider focus for expansion around the M55 junction hub on the edge of Blackpool.
- The Market Driven Approach informs wider consideration of all the options by assessing what would be likely to happen without a planning framework.

Option 3 – Suburban Expansion was noted to have the greatest potential impact on residents within the Beacon Forum area, with development proposed for the area surrounding the Technology Park in Bispham.

Potential development on Marton Moss would require consultation with the Civil Aviation Authority to ensure that any building work would meet the necessary requirements and not limit the activities undertaken at the airport.

Concerns were raised regarding the impact of the proposals on the natural environment and potential reduction in green space for public use.

A Flood Risk Assessment had been undertaken on Marton Moss and it had not been identified as a high risk area. The majority of modern floods were caused by flash water and excess rain.

The regeneration of Blackpool was key to the Core Strategy Issues and Options Document and included the development of the Central Station Site, the future of conferencing in the town and the Winter Gardens, development and modernisation of holiday accommodation and the whole tourism industry and the relocation of Blackpool and The Fylde College.

Of key interest to residents in the north of the borough would be future developments on the Blackpool and The Fylde College following the relocation of the College.

4. Conclusion

The statutory consultation on the Core Strategy Issues and Options Document had been extended to 1st October 2008 to allow additional time for local residents to submit any comments either in writing, via the Online Consultation Portal or by email.

**BLACKPOOL COUNCIL REPORT of the
HEAD OF LEGAL AND DEMOCRATIC SERVICES to
THE CHERRY TREE AREA PANEL**

THE CHERRY TREE AREA FORUM MEETING HELD ON 23rd SEPTEMBER 2008

1. Introduction

The Chairman, Councillor Evans welcomed residents to the Cherry Tree Area Forum.

He explained that at a Special Area Panel meeting had been held on 23rd July 2008, the members of the Panel had agreed to hold a Special Area Forum meeting to discuss and consult with residents within the Cherry Tree and Parklands Area Forum boundaries to the Blackpool Core Strategy Issues and Options.

Mr Graham Page, Group Planning Officer, Tourism and Regeneration Directorate was cordially invited to attend the Forum and provide residents with information on the Blackpool Core Strategy and how they could submit feedback and comments.

2. Theme – Blackpool Core Strategy Issues and Options

Mr Page explained to the residents that the Blackpool Core Strategy Issues and Options document was approved by Council in June 2008 and was at present out for consultation for a period of 10 weeks. The official deadline of the consultation was outlined as 26th September 2008, although it was emphasised that although this was an advertised deadline, comments and responses would be accepted upto several days after to allow maximum involvement.

The purpose of the Core Strategy was to set out key strategic decisions that would be made about Blackpool's future development that would create a framework for a more prosperous and healthier Blackpool by 2025. A core requirement was for locations to be identified for around 7,500 new homes. This subsequently would address the housing market imbalances and revive inner areas whilst providing a wider mix of more affordable housing. In addition, approximately 40 hectares of new employment land would need to be identified. This would diversify the economy by the provision of quality opportunities for new development to provide more and better paid jobs.

The Core Strategy outlined other key issues for consideration such as the resort as a whole and in particular, ways to sustain a more all year round visitor market and provide new high quality attractions and improved accommodation. Addressing the poor quality of the urban environment, developing sustainable, safe and healthy neighbourhoods with a diverse range of services, balance the requirements for new development with environmental factors and make better connections to and from Blackpool with easy access to jobs and local services, and new developments that would be well served by sustainable modes of transport.

The six Spatial Options were outlined to the meetings with the main emphasis focused on the Marton Moss Urban Extension and the Wider M55 Hub Growth Point.

The Marton Moss urban extension would look at what extent the town could meet its expansion needs beyond its existing urban area, but more singularly focusing on growth on Marton Moss.

Prior to any decision being made each of the different Options would need to be looked at in great detail and specialist criteria would need to be fulfilled. The key aspects were outlined as:

- how would the Option best meet development needs and safeguard important land resources
- how would the option effect service and infrastructure provision

Questions were raised with regards to the status of the land situated in and around Marton Moss area that was outlined as a preferred option and whether it was indeed Green Belt land. Mr Page explained that the land was not Green Belt land but was protected as a Countryside Area. The land had been protected against development for the length of the Local Plan that was in force. The Plan had now expired therefore the area was now under review.

It was explained that once a preferred option had been identified then it was likely that some lands would need to be purchased by the Council to make way for any developments. The preferred option would not be identified until mid 2009, however the Council was committed to work with the residents to achieve the best outcome for all concerned.

Many residents raised concerns with regards to the long history of the flooding in and around the Marton Moss and Whyndyke Farm lands. In recent weeks there had been heavy downpours subsequently leading to flooded gardens and a threat to properties. Mr Page explained that in accordance with information from Environment Agency the lands identified for potential growth had not been outlined by the Agency as being at risk. However, it was noted that as statistics showed that 75% of flash floods in recent years were a result of heavy prolonged downpours, the infrastructure for the development must be passed by United Utilities and adequate drainage would be installed in the area.

Residents highlighted increased traffic and access in and out of any proposed development as a major cause for concern. Mr Page explained that the traffic flow and access points to any of the developments had not been discussed as of yet, however such detail would be addressed once the area for development had been decided upon.

Mr Page reiterated that the options were indeed outline details and the finer details such as property type and services would be considered at a later date. He urged residents to take part in the Consultation process and feedback thoughts and comments on the Core Strategy Issues and Options by:

- Visiting the Council Portal and entering their details at <http://consult.blackpool.gov.uk>
- Writing direct to:
Development Plans and Projects Team
Planning Department
Blackpool Council
PO BOX 17
Corporation Street
Blackpool
FY1 1LZ
- Email comments to: development.plans@blackpool.gov.uk
- Or by completing a comments form and returning to the address shown above

It was noted that although the official deadline for receipt for feedback was advertised as 26th September 2008, this had now been extended to the 3rd October 2008 to allow for maximum participation.

3. Conclusion

The Chairman urged residents to take part in the Consultation process and it was agreed that once a development option had been determined then it would be beneficial for all residents living within the Cherry Tree and Parklands Area Forum boundaries to receive an update from Mr Page, with regards to the next steps to the developments.

Appendix C – Issues and Options: Consultation Report

BLACKPOOL CORE STRATEGY ISSUES AND OPTIONS CONSULTATION REPORT

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4	The Choice of Alternative Spatial Options	5
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1. Introduction

Public consultation on the Blackpool Core Strategy Issues and Options document took place between July and September 2008. The following report outlines the consultation undertaken and the representations received on the options and issues identified. Firstly, the report focuses on the six broad spatial options presented in the Issues and Options report, then provides an overview of responses to the proposed Vision, Objectives, and a range of strategic issues and choices, before setting out how the Council intends to take the Core Strategy forward.

The Blackpool Core Strategy Issues and Options document set out:

- The local planning context taking into consideration the range of existing local and external strategies that will continue to influence Blackpool's future development
- A summary of the Core Strategy 'evidence base' comprising various reports and studies providing a detailed understanding of key issues and characteristics of Blackpool (including evidence on topics such as housing, employment, retail, flood risk, heritage, and transport – details of these key documents are available to view on the Council's website).
- A Mini-Spatial profile of the town, identifying the key issues facing Blackpool
- The Core Strategy Vision and Objectives to address these issues
- Six broad 'spatial' options for Blackpool's future growth and development
- Wider policy issues, for example relating to the resort, housing, employment environment and transport.

2. Setting the Scene

The choice of the preferred way forward for Blackpool's broad spatial development and growth must continue to be made within the framework of a range of guidance set by wider Government national and regional planning policy.

Most specifically, the North West Regional Spatial Strategy (NWRSS) adopted on 30th September 2008 now forms a key overarching part of the statutory Local Development Framework for Blackpool. It sets out key policies and requirements which must be reflected in the Blackpool Core Strategy.

Other major influences on the direction of the Core Strategy at local level comprise:

- *The Blackpool Sustainable Community Strategy (SCS)*, prepared by the Local Strategic Partnership which coordinate the objectives of various community, voluntary and statutory organisations across Blackpool.
- *Blackpool's Local Area Agreement (LAA)*, which is the main delivery plan for the SCS, with the content of the LAA agreed between the Local Strategic Partnership and Government, and reviewed every 3 years.
- The ReBlackpool Urban Regeneration Company, which is harnessing public funding and much wider private sector investment to transform the resort.

3. The Issues and Options Consultation

The Council undertook an extensive programme of consultation with stakeholders and the wider community to inform the way forward from 18th July to 26th September 2008. The Issues and Options report was made available:

- On the Council's website
- At the main Council Offices
- At all libraries in the Borough
- To statutory bodies, organisations and key interest groups.

Extensive publicity was given to the Issues and Options document in the local press including a special feature in the Council's own newspaper 'Your Blackpool' which was delivered to all households in the Borough during the consultation period.

In addition, planning officers gave presentations to interested groups internally within the Council and to outside groups and organisations. Two Special Area Forums were held to focus on more specific local areas in both the north and south of the town.

Despite this, the overall response to consultation at the Issues and Options stage was limited, with around 80 total responses. Further consultation when firmer policies and proposals have been developed on specific issues will be undertaken in advance of progressing to the Publication/ Submission Edition of the Core Strategy. The consultation feedback documents to date, together with the summarised responses to the first stage of consultation will be made available at the main Council Offices and on-line.

The remainder of this report provides an overview of the outcome of the Issues and Options consultation and identifies a preferred broad spatial way forward for Blackpool's future development. This will then provide a basis for the detailed preparation of the next formal stage which is the 'Preferred Option' followed by the Publication/Submission Edition of the Core Strategy

Making the Choice

The Core Strategy as a whole needs to be considered against all the spatial objectives identified in the Issues and Options report and substantially mirror the identified priorities under the Goals of the Sustainable Community Strategy (SCS):

Goal 1: Improve prosperity for our population

Spatial Objectives:

- Ambitious and sustainable economic growth
- Provide an enhanced all year round tourism product
- Re-establish the town centre as a first choice destination
- Enhance employment quality and opportunities
- Improve transport integration and increase accessibility
- Make best use of all land resources and buildings.

Goal 2: Develop a safe clean and pleasant place

Spatial Objectives

- Address housing market imbalances and provide a wider mix of new homes
- Regenerate resort and residential neighbourhoods
- Promote balanced communities with ease of access to facilities and services
- Lift quality in the built and natural environment
- Create a healthy, safe, clean, and 'greener' Blackpool
- Tackle poverty, reduce social exclusion, and raise skills and attainment

Reflecting all of the above, three key aspirations were identified in the Issues and Options report which embrace these objectives, and were seen as the driving forces for identifying the best option for Blackpool's future growth.

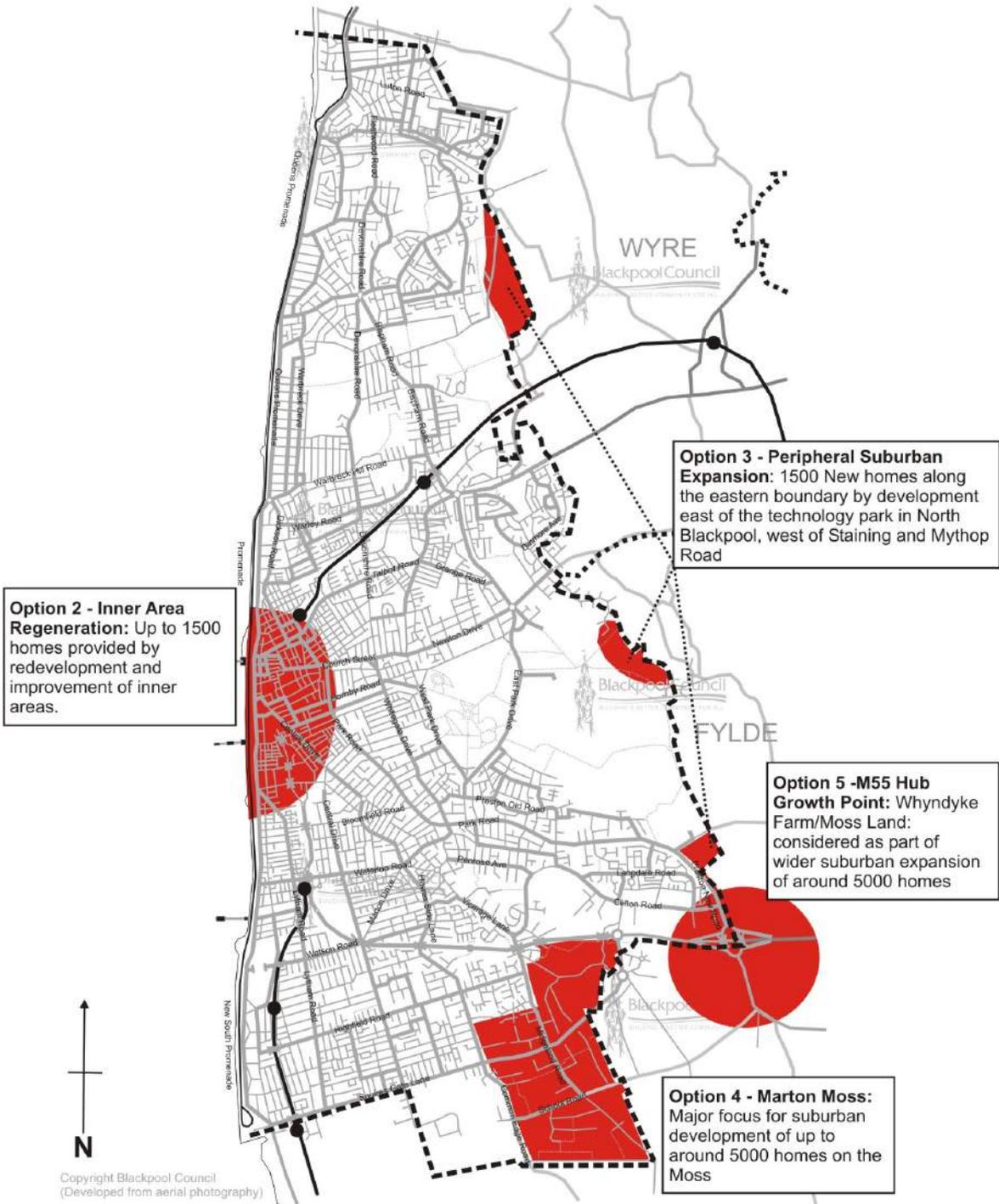
These are:

1. The need to provide the right land use framework for fundamental physical change to the inner resort, town centre and residential core which have been identified as a priority for regeneration.
2. The need to ensure the provision of a sufficient range of both high quality homes and employment opportunities in sustainable locations to meet resident needs.
3. The need to make the most of all the land resources and buildings that contribute to Blackpool as a place to live, work and visit – getting the most from its built and natural environment, its infrastructure and facilities.

4. The Choice of Alternative Spatial Options

An indicative illustration of the range of options for Blackpool's future development is set out below.

Option 1 - Urban Concentration seeks to maximise growth by promoting several hundred homes through development of remaining spaces and intensification of the development across the existing urban area



Residents are also asked whether there are any other options they wish to put forward to meet Blackpool's growth and development needs

The choice between the various spatial options also needs to specifically consider 5 other factors:

1. *The strategic implications on the longer term regeneration and development of Blackpool and the wider Fylde Sub-Region.*

A sustainable future for Blackpool means also taking a longer term view and having a clear understanding of where the priorities lie. In the context of Blackpool's limited choice and the fact that development pressures will continue – the evolving strategy to 2025 must also have regard to the longer term need to manage and balance Blackpool's future development and growth, whilst maintaining and enhancing its townscape and natural assets.

The Blackpool Core Strategy also needs to be coordinated with the respective Fylde and Wyre Core Strategies. While Blackpool is the principal urban centre, there are major links and interdependencies between the three authorities, with shared employment, housing, transport issues and other interest across the Fylde Sub-Region, seeking to deliver regeneration and investment across a number of fronts.

2. *The potential to deliver quality*

Raising all aspects of quality for the resident, visitors, and business environment is a vital aspect of Blackpool's regeneration. There is a fundamental need to deliver quality, both in the design and layout of new development, and by tackling the past legacy of environmental problems that detract from the enjoyment of Blackpool as a place to live and work.

3. *The potential to efficiently manage transport and travel demand, and improve connectivity within Blackpool and the Fylde Sub-Region*

Economic vitality and the quality of life of residents are closely linked to the effectiveness of transport infrastructure. Planning transport effectively and promoting good accessibility by a range of transport modes, by focusing development in the most appropriate locations, will ensure a better integrated transport system both within Blackpool and across the Fylde Sub-Region.

4. *The impact on wider infrastructure and services provision.*

Balanced and healthy communities should provide for a full range of local shops, open space, education, health, leisure and supporting community facilities accessible to all. Future development needs to be undertaken in a way that makes the best use of existing infrastructure, maximising integration with the existing urban area. Equally, it must ensure that when new facilities and infrastructure are required – whether to overcome development constraints such as drainage or highways issues, or meet new local community needs – they must be provided in a way which best helps shape future neighbourhoods to deliver efficient community facility provision to support the social and economic fabric of new development areas.

5. *A market overview and summary assessment of deliverability.*

The assessment of each of the options concludes by drawing together the issues in terms of their implications for the overall deliverability of the options in the context of realities on the ground, policy issues, market attractiveness and the timescale of the Core Strategy to 2025.

The remainder of this section therefore considers to what extent each of the broad spatial options will best deliver these aspirations and how they will impact on the above issues. The assessments, which follow, has been informed by:

- The specific response to the Issues and Options document from key regional development bodies and other organizations
- The consultation responses from other key agencies, landowners and development interests
- The local public acceptability of the strategic development options
- The sustainability assessment of the alternative development options.

Sustainability Appraisal

Councils are required to plan their areas in ways that contribute to the achievement of sustainable development – to meet the needs of the present without compromising the ability of future generations to meet their needs.

European and national planning legislation requires that an independent Sustainability Appraisal (SA) is undertaken of the Blackpool Core Strategy to consider the likely social, economic and environmental effects of the options, policies and proposals. It includes Strategic Environmental Assessment (SEA), which involves assessing the environmental effects of plans and programmes.

Hyder Consulting were commissioned by Blackpool Council to undertake a Sustainability Appraisal of the strategic options. The aim of SA is to inform the choice of options, reduce the negative impacts and increase the positive impacts of policy choices and different courses of action.

Their *'Sustainability Appraisal of the Core Strategy, Assessment of Strategic Options'* was completed in April 2008 and focused on the primary elements of each of the 6 spatial options. The full assessment is available to view on the Council's planning website, and a summary of the key sustainability strengths and weaknesses was included alongside the description of the alternative spatial options in the Core Strategy Issues and Options Report.

The sustainability of the alternative development options is a critical element of determining the way forward and underlies much of the officers' own consideration of the broad options, as well as being directly informed by the independent Sustainability Appraisal.

A further detailed Sustainability Appraisal will be undertaken in 2009 setting out the social, environmental and economic effects of the eventually determined Preferred Option.

Alternative Spatial Options Assessment

As has been stated, Blackpool's broad spatial options compared to many areas, are very limited and, at the outset, it is recognised the eventual preferred option is likely to be a matter of finding the right balance and mix between the various alternatives – rather than a simple choice of one preferred option.

Public consultation also sought views on whether any other broad spatial options should be considered. However, with a comprehensive range of options put forward, there were no further suggested alternatives to meet Blackpool's needs.

In determining the long term strategic planning framework for Blackpool's future development, the most obvious direct demands are the housing and economic development requirements of the adopted NWRSS (North West Regional Spatial Strategy) as part of the national priority for housing and supporting employment growth. These requirements are set out and discussed in full in three documents – the Fylde Sub-Region Strategic Housing Market Assessment, the Blackpool Strategic Housing Land Availability Assessment and the Blackpool Employment Study.

Basically, the situation for housing is that the NWRSS requires 9,800 new homes in Blackpool (2003-2025). Allowing for houses already built, under construction or with planning permission at April 1st 2008, this leaves an outstanding net requirement for around 7,500 new dwellings. Around a third of this required development can be met from windfall developments within the existing urban area, leaving an outstanding requirement for around 5,000 dwellings (2008-2025). The total of 9,800 is a minimum requirement. Blackpool has also submitted a bid to Government for Growth Point status in partnership with the Central Lancashire authorities which could further increase this figure by around 500 dwellings.

Equally, it is an essential part of an effective development strategy to make sure Blackpool has a good supply of employment land geared to meet the needs of the economy. The 2007 Blackpool Employment Land Review identified the potential need for around 40 hectares of new employment land, either within or on the edge of Blackpool to 2025.

Thus when considering the 6 strategic alternative spatial options for Blackpool's future development, two key requirements are to find sites for around 5,000 more homes and 40 hectares of employment land together with all other supporting land uses, services, facilities, recreation opportunities needed for balanced and healthy local communities.

Having already taken account of the capacity within the existing urban area for new 'windfall developments', the higher housing and employment development requirements mean that some new development will inevitably now be required on the edge of Blackpool.

The challenge for the Core Strategy is to determine a balanced level of provision which meets development targets and enables the necessary associated infrastructure provision or improvements to take place in the most efficient way.

The rest of this section assesses each of the six broad spatial options against the considerations set out on page 8 of this report.

Spatial Option 1 – Urban Concentration

Objective

Urban concentration is about seeking to intensify and increase the density of development within the urban area, by actively promoting a range of opportunities. This option would much more actively promote and encourage development of underused areas of land and higher densities of development.

Rationale

Government Guidance through the sequential approach encourages a primary focus for new development on derelict, vacant, and neglected sites within the existing urban area – and this is a priority for Blackpool Council under all options.

Spatial Option 1 goes beyond this by pro-actively promoting a range of housing development opportunities, with a focus on underused sites in existing use, such as:

- development of large garden areas
- redevelopment of larger detached properties
- redevelopment of underused open space
- redevelopment of underused land/ buildings on existing employment sites.
- redevelopment of existing factories/ businesses outside the main estates

Sustainability Appraisal

Option 1 performs well against many of the SA objectives, most notably because it focuses development in urban areas that on the whole would benefit from some form of regeneration, and are already well served by transport infrastructure and essential services. Impacts are likely to be realised in the wider borough, e.g. in terms of crime and economic growth.

The option also focuses development on Brownfield and underused land. However, whilst there may be numerous benefits associated with this, the actual extent of benefits may be limited principally because the option is likely to result in only very small scale development spread thinly across the urban area. It may not therefore be possible to target this into areas most at need of regeneration. It is likely that the option would only contribute several hundred dwellings out of the 4000-5000 actually required.

A key weakness of Option 1 is the likelihood that areas of urban open space may be lost in order to accommodate new development, or at least requirements for the provision of public open space in new developments may need to be reduced. Although this is as yet undecided, this may also extend to the loss of some existing shopping facilities, tourist accommodation and small businesses all of which would be detrimental. The loss of open space could also generate adverse impacts upon biodiversity and townscape.

If the negative effects of reduced public open space can be overcome, the principle of some level of urban intensification on Brownfield sites should be taken forward in conjunction with other proposals.

What the community and stakeholders told us

- General support for an approach to focus development within existing 'built up' areas before considering greenfield sites
- Concerns in the context of the already densely built up Blackpool urban area about potential losses of open space, garden areas, and detached dwellings for more housing - raising concerns of town-cramming.
- Other elements of this approach raised less concerns, with some support for higher densities of development on appropriate new sites, and for the redevelopment of employment uses in appropriate locations.

Option 1 Performance against Key Aspirations and Objectives	
<i>Fundamental change/regeneration of resort and residential core.</i>	Neutral in impact
<i>A range of high quality homes and employment in sustainable locations.</i>	This will potentially deliver only a few hundred additional dwellings. It will not create any additional employment opportunities, and might reduce them.
<i>Make most of built and natural environment, infrastructure and facilities.</i>	Whilst focusing development within the existing urban area, the limited benefits of development brought forward could be undermined by their cumulative adverse impact on the remaining 'openness', of what is already an intensively built up environment. Surface water drainage is also more problematic within the existing urban area, with a need to retain permeable surfaces which reduce run-off.
<i>Long term regeneration/development of Blackpool & Fylde Sub-Region.</i>	The benefits of this option are focused on the short term, by maximising opportunities within the existing built up area. It would not significantly affect or support longer term development needs.
<i>The potential to deliver quality.</i>	Higher density schemes can individually be as high quality as lower density schemes in built design terms. However, cumulatively a continuing erosion of remaining openness within the Blackpool urban area would have a negative impact on the urban environment.
<i>Efficient transport and travel within Blackpool & Fylde Sub-Region.</i>	The dispersed distribution of a limited quantum of additional housing throughout the existing urban area will have no significant impact on transport and travel needs. The existing Blackpool urban area is generally readily accessible and well served by public transport.
<i>The impact on wider infrastructure and services provision.</i>	New development under this option would be dispersed across the existing urban area. It would thus be well served by shops, schools, community facilities and supporting services, and in net terms make less demands on new infrastructure.

Market Overview and Deliverability.

Despite the current market downturn, higher value housing uses, where permitted, will continue to be an attractive option to landowners and developers. While some elements of the urban concentration option have received support, others raise concerns. The potential advantages of

policies pro-actively promoting more intensification within the existing urban area, including specific new housing opportunity sites would need to be very carefully balanced, and a policy of over-intensification would not be supported. This is likely to erode further the contribution that urban concentration could make to future required levels of development over the plan period, perhaps to only a few hundred, rather than several hundred dwellings.

Spatial Option 2 – Inner Area Regeneration

Objective

This option is about targeting much more growth to central Blackpool to provide for an enhanced residential offer in inner area communities, and to act as a wider economic driver to address problems of resort decline, particularly in the holiday accommodation sector.

Rationale

Significant steps have been taken towards achieving this via the town's evolving regeneration plans which have started to deliver wider changes on sites such as Talbot Gateway, Hounds Hill, the former Central Station site, Promenade headlands, and wider seafront.

This option seeks to identify the priorities for regeneration and to explore to what extent there is support over and above existing key sites for further major inner area redevelopment, and specifically for widening housing choice in the inner areas.

Sustainability Appraisal

Option 2 performs very strongly against many of the SA objectives, notably because it focuses development into the areas most at need of regeneration, in areas that could potentially spearhead wider regenerative efforts given its central location at the heart of the town, and also in areas that are well serviced by public transport and essential services. There is potential for cumulative benefits associated with wider regeneration proposals.

However, it is essential that growth in this area provides sufficient balance between residential growth and growth in the tourism industry. This is a central area of the Blackpool resort and could be a clear driver for regeneration of the tourist offer. It should also be noted that there are significant other regeneration proposals in and around this area which would assist both residential and commercial regeneration.

The principle of developing in the inner urban areas along with other regeneration schemes should be taken forward, although the balance between residential and tourist development must be retained. Further development outside these areas will also be required.

What the Community and Stakeholders told us

- Support for this approach to assist resort, town centre and wider regeneration of Blackpool, both from the general public, regional bodies and other interests.
- Conversely, recognition from some, but generally more limited public awareness, of the huge resource implications which could impact on the deliverability of this option.
- A preferred focus for inner area regeneration on sites close to the seafront and town centre, and on key highway frontages to maximize their impact.

Option 2 Performance against Key Aspirations and Objectives

Fundamental change/ regeneration of

This option, to the extent it can be delivered, will most directly address these concerns

<i>resort and residential core.</i>	
<i>A range of high quality homes and employment in sustainable locations.</i>	The level of new development which will be provided will be very dependent on what steps can be taken to assemble site development opportunities through a pro-active regeneration agenda. This will be dependent on both the scale of public funded intervention that can be made available, and how quickly changes delivered provide their own momentum for further private sector investment and development.
<i>Make most of built and natural environment, infrastructure and facilities.</i>	Maximising the extent to which inner area regeneration can contribute to new housing development requirements will, if delivered in line with aspirations, have a major positive impact - both in terms of reducing the scale of development required to be met on greenfield sites, and uplifting the existing urban area. Surface water drainage is more problematic within the existing urban area, with the need to ensure redevelopments retain net permeable surfaces and do not add to surface water run-off.
<i>Long term regeneration/ development of Blackpool & Fylde Sub-Region.</i>	The effective transformation of inner Blackpool into a place offering an increased and better mix of housing within attractive neighbourhoods is fundamental to the long term ambitions of the Core Strategy.
<i>The potential to deliver quality.</i>	A key focus of this option is about providing a quality as well as a quantum uplift in the resort, town centre and residential offers. Larger scale quality new developments, with a variety of forms and densities, including taller buildings would help meet Blackpool's development needs, and enhance the environment of these areas through the creation of new landmarks and improved public realm and community spaces. Redevelopment would assist both resort and community regeneration, improving the tenure and choice of housing and upgrading the resort accommodation offer.
<i>Efficient transport and travel within Blackpool & Fylde Sub-Region.</i>	In location terms, inner area regeneration represents an effective way forward in helping to conveniently meet development needs with ready access to most facilities and services reducing dependence on car travel. Improvement of the pedestrian network is an integral part of inner area regeneration to ensure convenient, safe and pleasant access is provided and make walking more preferable for most short journeys. Other facilities, such as open space and, to some extent, schools, are less conveniently provided – but central locations are generally well connected by local public transport to facilities across the town, and for longer distance travel by rail and bus.
<i>The impact on wider infrastructure and services provision.</i>	New development under this option would be concentrated within the existing inner urban area. It would thus be well served by shops, community facilities and supporting services, and in net terms make less demands on new infrastructure.

This option would require both major public and private sector investment. This could only be successful if backed up by concerted wider action to provide new investment in leisure, shopping, seafront, and other town centre and resort infrastructure.

The wide recognition that now exists of Blackpool's need for regeneration, the creation and ongoing success of the ReBlackpool URC in harnessing investment, and the concentration of private sector re-investment in the future of central Blackpool, are all factors that support the deliverability of this option.

Blackpool's regeneration is gaining impetus, but future investment opportunities will need to be identified and delivered before it can more effectively provide its own momentum for change. Inner area regeneration is considered a critical and essential element to the whole delivery of the Blackpool Core Strategy.

Spatial Option 3 – Peripheral Urban Expansion

Objective

This option seeks to assess to what extent further greenfield locations should be promoted on remaining lands on the eastern edge of the Blackpool urban area.

Rationale

Blackpool's past growth and development has been based on providing a mix of housing and supporting development opportunities. With the established requirement for substantially increased housing, wider suburban expansion would provide a better range of sites to meet development choices on the edge of Blackpool.

Sustainability Appraisal

This option would generate benefits associated with developing residential land closer to potential sources of employment in eastern Blackpool. The option also includes for some growth in the inner regeneration areas which could lead to some of the positive effects identified in Option 2 above although not as strongly.

The key concerns with this option relate to a less well developed transport infrastructure in the east and the cumulative loss of a number of small areas of urban fringe open space, which may also lead to an encroachment on Green Belt and possible settlement coalescence.

A number of environmental SA objectives could be adversely affected by this option, the main issues being landscape, biodiversity and potential flood risk.

Potentially, 1,500 dwellings could be provided through this option, with the remainder provided within inner areas and on Marton Moss. It could also be considered that with the exception of Marton Moss, these small extensions may not have the critical mass to support a sustainable community and may in fact result in increased pressure on existing local services.

It is not recommended that this option is carried forward into the preferred strategy.

What the Community and Stakeholders told us

- There was only limited public response expressed at this stage – with those who did respond on this issue generally not supportive of peripheral development on the eastern edge of Blackpool.
- The neighbouring local authority is opposed to the development of lands within the currently designated green belt between Blackpool and Carleton.
- The neighbouring parish council is opposed to the development of lands between Blackpool and Staining.
- Local concerns were raised about ground conditions and drainage issues on the lands at Mythop Road, but there is landowner, developer, and some public support for the development of these lands.
- Concerns were expressed from environmental interest groups about the impact of greenfield development on the natural environment.

- Generally, the response from regional bodies and organisations was that this option, in line with the sustainability appraisal, should have little role to play.

Option 3 Performance against Key Aspirations and Objectives	
<i>Fundamental change/ regeneration of resort and residential core.</i>	Peripheral development would not directly support inner area regeneration, and could undermine its delivery unless carefully planned as part of a phased and coordinated development strategy
<i>A range of high quality homes and employment in sustainable locations.</i>	Past suburban expansion has been an integral element of maintaining a stable Blackpool resident population and supporting its local economy. A wider range of housing sites will add to the attractiveness of the Blackpool housing offer. However, there is little scope for employment expansion on these sites, both in terms of size and market attractiveness.
<i>Make most of built and natural environment, infrastructure and facilities.</i>	These peripheral sites could be reasonably integrated with the existing urban area, but are generally less close to local services and facilities. Development in north east Blackpool would erode the Green Belt. Similarly, development of lands west of Staining would only be a realistic option if closely integrated with adjoining Green Belt lands in Fylde. Lands at Mythop Road are not part of the statutory Green Belt, but remain part of a wider expanse of lands currently allocated as countryside area on adjoining lands in Fylde, and logically their future should be determined in conjunction with these lands.
<i>Long term regeneration/ development of Blackpool & Fylde Sub-Region.</i>	The long term development potential of lands between Blackpool and Carleton and Blackpool and Staining are constrained by the currently designated Green Belt on adjoining lands in Wyre and Fylde. The need to prevent the coalescence of settlements would remain an important long term objective.
<i>The potential to deliver quality.</i>	The identified broad locations could provide for a range of homes in a high quality residential environment. However, they would be relatively localized and fragmented improvements, with limited scope for delivering a wider quality of place with a range of integrated facilities.
<i>Efficient transport and travel within Blackpool & Fylde Sub-Region.</i>	No major new highways infrastructure would be expected to be required for development of these peripheral lands. The sites in north east Blackpool, close to Staining, and off Mythop Road all can be accessed from the existing main highway network. There is a less well developed and convenient public transport accessibility to lands on the eastern edge of Blackpool, than more central locations. There is potential for the integration of walking and cycling with adjoining areas, but public transport connectivity and viability and the wider integration of development and transport is more difficult to deliver from dispersed peripheral sites, as against more comprehensive development locations.
<i>The impact on wider infrastructure and services provision.</i>	Although not major, the peripheral levels of development proposed under this option would still represent a substantial expansion and could place significant demands on nearby schools, services and facilities. These peripheral locations are also less well served by shops

and local community facilities in their immediate vicinity.

Market Overview and Deliverability

Putting aside wider constraints and other considerations, in market terms a wider mix of suburban residential development sites would be attractive to developers. The concentration of peripheral sites in a limited number of ownerships would potentially also assist bringing forward lands for development. However, the realities are the Green Belts between Blackpool and Carleton and Blackpool and Staining are a major policy constraint on the potential development of lands in north east Blackpool and west of Staining. Whether there is any more limited potential for a 'rounding off' of development on lands west of Staining within Blackpool will need to be considered, with the local parish council opposed to any significant expansion.

There is no Green Belt constraint on the lands at Mythop Road within Blackpool, but peripheral expansion on this site still raises a range of countryside, landscape and drainage issues. The development of lands within Blackpool would be much better addressed as part of a more comprehensive assessment of development opportunities on the wider adjoining lands in Fylde. A peripheral development of the lands in Blackpool alone would not relate well to the adjoining open lands and also would be less likely to have the critical mass to support effective wider community provision in this location.

Spatial Option 4 – Marton Moss Urban Extension

Objective

This option seeks to assess to what extent there is potential for a sustainable urban extension to Blackpool, through a concentration of major new development, focused on Marton Moss.

Rationale

This option recognizes that Blackpool's past growth and development needs have in the past been based on a mix of development and improvements within the urban area, alongside a significant level of suburban expansion. Marton Moss is the one remaining concentration of largely undeveloped land in Blackpool, and this option considers the potential for a comprehensive development focus in this location. The nature and character of the lands supports a substantive rather than piecemeal approach. Comprehensive development would enable the more effective provision of supporting infrastructure, services and facilities.

Sustainability Appraisal

Option 4 consists of a major new suburban expansion at Marton Moss. This option has only limited provision for supporting development in the inner urban regeneration areas so the benefits realised there would be smaller. There are few significant environmental constraints to development in this area and whilst 'greener' areas would be lost, they do not represent the same character and quality of the more rural locations identified in option 3.

This option could potentially provide 5000 dwellings. There are however uncertainties as to whether it could create a truly sustainable community. It has sufficient critical mass to become more self-sufficient and sustainable transport proposals have been suggested. However, the layout and former uses for the site suggest that employment provision could be limited which is a significant weakness. It is expected that supporting shops, community facilities and services would be provided and a range of housing to meet local needs would also be inherent.

This option would perform significantly better against the SA objectives if there was a strong commitment to it being developed and designed as a sustainable community following principles associated with the Growth Point proposal in Option 5 and also the Best Practice in Urban Extensions and New Settlements guidance from the Department of Communities and Local Government (DCLG).

Without such a commitment, it is considered that this option should not be taken forward, as it would not be in the best interests of delivering a sustainable Blackpool.

What the Community and Stakeholders told us

- There is opposition from many residents to development on the Moss because of nature conservation, amenity, and greenfield/ countryside area development issues.
- The response from other residents, land owners and house-builders is supportive of development on some parts of the Moss.
- Drainage issues are an important consideration. Utility providers recognise the better potential for surface water drainage as part of a wider greenfield development strategy, but there would be a need to increase capacity to deal with foul and surface water drainage to serve development needs.

- Generally, regional bodies and organisations recognise that some elements of this option could be taken forward - subject to concerns about infrastructure, and to determining a suitable mix and critical mass of different uses to provide a sustainable community at Marton Moss.

Option 4 Performance against Key Aspirations and Objectives

<p><i>Fundamental change/ regeneration of resort and residential core.</i></p>	<p>Unless properly coordinated as part of a phased development strategy development on Marton Moss could undermine regeneration by providing easier and more attractive greenfield development opportunities on the edge of Blackpool, diverting developers interest away from tackling, or creating more difficult and costly redevelopment sites in the inner area. A major focus for development on Marton Moss would need to be carefully planned to be readily integrated with the existing urban area and supportive of wider regeneration.</p>
<p><i>A range of high quality homes and employment in sustainable locations.</i></p>	<p>The scale of lands available on the Moss has the potential to deliver a wide mix of quality homes, as part of a balanced residential community with supporting services and facilities. However, the concentrated form of existing development on the Moss, different from typical countryside areas, limits the opportunities for wider provision of employment, playing fields and those other uses which generally require large contiguous open areas of land or cleared sites. The relative lack of such sites undermines the potential of the Moss to create a fully sustainable community to meet a range of wider needs and support economic growth - as against the provision of a suburban residential extension.</p>
<p><i>Make most of built and natural environment, infrastructure and facilities.</i></p>	<p>The development of most or the whole of the lands on the Moss would represent a major concentration of development in one area. This land is not part of the statutory green belt (currently being allocated as countryside area) and not subject to any other specific landscape protection. Comprehensive development would enable the more effective provision of supporting services and facilities, with well connected and accessible housing linked by a sustainable transport and open space network. Development would lead to the displacement of existing urban fringe uses such as horse stabling, recreation uses, and remaining smallholdings, for which there is a need on the edge of most urban areas. The range of existing uses would also reduce the density and quantum of new housing that could be developed on the Moss, compared with more typical areas of open countryside.</p>
<p><i>Long term regeneration/ development of Blackpool & Fylde Sub-Region.</i></p>	<p>The scale of lands on the Moss – in excess of 200 hectares - could provide the potential for a substantial long term development focus for a new suburban extension on the south eastern edge of the existing Blackpool urban area. The limitations of the particular character of the Moss, however, would not readily support the provision of new jobs, as well as homes, as part of a wider strategy to meet long term growth needs. How any substantial level of development could be coordinated to help drive forward inner area regeneration, rather than compete against it, would need to be a crucial component of any long term development strategy.</p>

<p><i>The potential to deliver quality.</i></p>	<p>The character and scale of the Moss is such that it could provide for a range of homes in a residential environment. The substantial amount of longstanding development on the Moss would make it important for any new development to be sensitively designed to respect and enhance its existing character. The potential for large scale development would, however, provide opportunities for a wide mix of housing with locally distinctive designs appropriate to the surrounding built form and character of the Moss. Comprehensive rather than piecemeal development would also assist the incorporation of appropriate landscaping, energy and resource conservation within any development.</p>
<p><i>Efficient transport and travel within Blackpool & Fylde Sub-Region.</i></p>	<p>Development of and access to new potential sites on the Moss would be assisted by the major link that already exists across the middle of the Moss via Progress Way. There would be potential as part of a comprehensive development to promote walking, cycling and improve transport provision as part of any comprehensive approach to development.</p>
<p><i>The impact on wider infrastructure and services provision.</i></p>	<p>A larger development focus on the Moss will decrease the cost, and increase the viability of effective services and infrastructure provision in this location. Comprehensive development would enable the provision of necessary new on-site drainage infrastructure, and utility providers recognize the current lack of adequate capacity of existing off-site public sewers available to deal with foul and surface water drainage needs to be addressed with ongoing major new investment. Detailed further assessments would be required of planned levels and locations of new development. Substantial housing growth in this location would also need to be backed up by investment and provision of a range of supporting shops, community facilities and services.</p>

Market Overview and Deliverability

There is clear evidence of housing market developer interest in these lands, the future of which has previously been a key development issue at the last two reviews of the development plan for Blackpool. An outstanding outline planning application is currently undetermined for a substantial area of lands north of Progress Way. Other house-builders have expressed support for development, a number of whom it is understood have some degree of interest in areas of land on the Moss between Progress Way and Yeadon Way.

However, there remain major issues raised by the potential development of lands on the Moss. There are concerns and opposition to development from some residents and environmental groups, balanced by a growing recognition from others of its development potential.

The lack of adequate drainage capacity and the fragmented nature of existing development in the area mean that further development on the Moss would only be possible through a comprehensive and coordinated approach for the release of major areas of land. Comprehensive development would enable the provision of necessary new on-site drainage infrastructure. The lack of adequate capacity of existing off-site public sewers available to deal with foul and surface water drainage also requires major new investment, with ongoing major investment and review dependent on long term planned levels and locations of new development.

There is no general public perception or acceptance of the potential for a major focus for development on the Moss to deliver much of Blackpool's future housing. House-builders have themselves raised the issue that such a single focus is unrealistic. Past building rates in Blackpool would also not support a comprehensive development strategy for much of the Moss within the timescale of the Core Strategy to 2025.

There is also recognition that the existing pattern of uses on the Moss still performs an important role. Comprehensive development would be likely to result in their displacement rather than removal, questioning the effectiveness of such an approach, as against planning for a wider mix of development within and on the edge of Blackpool. The characteristics of the lands on the Moss would also mean its comprehensive development would make it difficult to accommodate wider employment land and other development requirements as part of a properly coordinated focus for growth.

Spatial Option 5 – Wider M55 Hub Growth Point

Objective

This option, like Option 4 (Marton Moss) seeks to assess to what extent there is potential for a sustainable urban extension on the edge of Blackpool, but in recognition of Blackpool's tight knit boundary and limited supply of land, it also considers wider potential development choices on adjoining lands in Fylde Borough.

Blackpool Council is liaising with Fylde Council in seeking a coordinated approach in their respective Core Strategies to the consideration of strategic development options on lands on the Blackpool/ Fylde boundary. The Fylde Council Core Strategy Issues and Options Report will be published in 2009.

Rationale

Substantial lands have already been developed around the M55 junction in recent years on lands in Fylde close to the Blackpool boundary – mainly for employment uses – including the Blackpool Fylde Estate, the large ITSA office complex, the B&Q store, and the expanding Whitehills Park. There have previously also been proposals for a range of commercial/ retail/ leisure uses on these lands.

Option 5 raises the issue as to what extent these lands in conjunction with lands in Blackpool could be developed for a potentially wider mix of uses as well as further meeting employment needs. Blackpool and Fylde are effectively part of one functional housing and employment market area, with the need to integrate development, transport and investment in a way which best supports sustainable patterns of development on both sides of the boundary.

Sustainability Appraisal

Option 5, as with options 3 and 4, has only limited provision for supporting development in the inner urban regeneration areas, so the benefits realised there would be smaller. It would also be situated on primarily greenfield land with associated landscape and environmental disadvantages and would mark a significant focus of development away from the existing urban area. This could be perceived in the long-term as a precursor to further urban infill between this and the existing urban areas in the south east of Blackpool. Although the site is greenfield, there are no significant environmental designations and it could be considered that the landscape value has already been degraded by the presence of the M55 and existing development. Whilst the efficient motorway access is beneficial it may also result in higher car dependence and vehicle movements.

The main strengths with this option relate to the commitments through growth point development, aiming to create sustainable communities with all the environmental enhancements and mitigation measures that are inherent with this. There would be close proximity between jobs and homes, the easy access to the M55 would be very positive in terms of employment land investment potential and the development would meet a wide range of housing needs not just for Blackpool but also Fylde.

If all the elements of a sustainable community are encouraged, this option should be taken forward in conjunction with other recommended proposals, as a supporting development.

What the Community and Stakeholders told us

- Limited general public response to this option, which is focused on large areas of land on the edge of Blackpool, rather than on existing communities.
- Support from land interests, as part of a wider development focus.
- Views expressed that a wider focus would be more deliverable, reducing reliance on Marton Moss to provide such high housing numbers.
- Concern that any such focus should be part of a coordinated approach in conjunction with, not at the expense of, regeneration.
- Concerns about the impact of greenfield development from environmental interests.
- Fylde Council did not express support or otherwise at this stage in advance of their own Core Strategy Issues and Options consultation.

Option 5 Performance against Key Aspirations and Objectives

<p><i>Fundamental change/regeneration of resort and residential core.</i></p>	<p>Similar to Option 4 (Marton Moss), a wider focus for development on the M55 Hub would also fundamentally need to be complementary to regeneration of the inner core. Unless properly coordinated as part of a phased development strategy, it could undermine regeneration by providing easier and more attractive greenfield development opportunities on the edge of Blackpool, diverting developers interest away from creating opportunities or tackling more difficult and costly redevelopment sites in the inner area.</p>
<p><i>A range of high quality homes and employment in sustainable locations.</i></p>	<p>The scale of lands available around the M55 Hub has the potential to deliver a wide mix of quality homes, including affordable housing, as part of a balanced residential community with supporting services and facilities. It is also of sufficient scale to build on the strengths of its existing employment focus and become a prime location for long term job growth to expand and diversify the sub-regional economy. The M55 itself, however, represent a major physical barrier to unifying development in a sustainable urban extension on the edge of Blackpool, rather than as a number of separate neighbourhoods. Any major development strategy would need to carefully evaluate how development could be effectively integrated – both to the existing urban edge, and to support the regeneration of inner Blackpool.</p>
<p><i>Make most of built and natural environment, infrastructure and facilities.</i></p>	<p>The M55 Hub provides a greater quantity and choice of development sites compared to other suburban development options. Properly planned, this increases the potential to optimise resource management, by focusing development in the most appropriate locations. Comprehensive development would enable the more effective provision of supporting services and facilities, with well connected and accessible housing linked by a sustainable transport and open space network. None of the lands are part of the statutory green belt, with most of the undeveloped lands not subject to any other specific landscape protection. Lands immediately to the north comprise the Marton Mere SSSI (Site of Scientific Interest) and Local Nature Reserve and any development would need to ensure it would not adversely affect its wildlife and conservation importance. To the east in Fylde there are attractive but narrow woodland belts of environmental</p>

	value which are also important features of the landscape.
<i>Long term regeneration/ development of Blackpool & Fylde Sub-Region.</i>	The lands around the M55 Hub, including Marton Moss, Whyndyke Farm, Whitehills, and wider lands straddling the two local authority areas – have the capacity to meet needs to 2025, with potential for sustainable longer term growth. Centrally located within the Sub-Region, and with excellent accessibility eastwards, the M55 Hub is an attractive location for potential business led expansion as well as wider housing growth. Its ready integration with the existing urban area would be essential to its delivery as a truly sustainable urban extension to Blackpool. Measures to improve connectivity north and south from the Hub to Fylde and Wyre would be equally critical to create a strategically significant long term development focus for wider sub-regional growth.
<i>The potential to deliver quality.</i>	The range of sites is such that it has the potential to provide for a high quality, attractive and safe environment which offers good housing, matching job opportunities with the full range of supporting services and facilities. Comprehensive future development would also assist the incorporation of appropriate landscaping, energy and resource conservation technology. In these terms it could become an impressive new gateway to Blackpool, but the motorway and adjoining strategic highway corridors also represent a major physical barrier and could have a negative impact in truncating rather than unifying the lands around the Hub. Its development and growth is therefore more likely to be as a number of distinct high quality neighbourhoods. Connectivity, accessibility, and landmark buildings and uses would be important considerations in seeking to unify the Hub as a distinctive and quality location as a whole. The substantial amount of existing development would make it important for future growth to be sensitively undertaken to enhance its character.
<i>Efficient transport and travel within Blackpool & Fylde Sub-Region.</i>	The major links that already converge on the Hub, comprising the M55, Yeadon Way and Progress Way, mean the location in these terms is already highly accessible, with the priority to improve connectivity north and south from the Hub, and with the existing Blackpool urban area. Improved public transport and more sustainable travel would be crucial components of providing a safe, convenient, and integrated development of the M55 Hub. There would be potential as part of a major development to promote walking, cycling and public transport. Major new development will in the short term be expected to secure the completion of the M55 – Heyhouses Link to Lytham St Annes and would also in the longer term increase the potential for improved links from the M55 northwards.
<i>The impact on wider infrastructure and services provision.</i>	<p>A larger development focus around the M55 Hub will potentially decrease the cost, and increase the viability of effective services and infrastructure provision in this broad location. It would be essential to take a longer term view in determining the best way forward for the provision of supporting services and the proper planning of the area.</p> <p>Comprehensive development would enable the provision of necessary new drainage infrastructure, with the lack of adequate capacity of</p>

existing off-site public sewers available to deal with foul and surface water drainage, as for Option 4, a major issue. The existing concentration of employment uses on both sides of the boundary and the existing retail focus around Tesco's would need to be backed up by major new investment in a range of other supporting community facilities and services.

Market Overview and Deliverability

A focus for growth around the M55 junction, yet just 2 miles from Blackpool town centre, represents an attractive and marketable location for major new development. There is already clear evidence of developer interest in these lands – both in terms of the ongoing expansion of employment development on the Whitehills Business Park, and landowner and house-builder interest on Marton Moss and wider lands in Fylde.

While there is also some opposition to development, the evidence to date is that the public acceptability of potential development on the wider lands around the M55 Hub raises substantially less concerns than a single major focus for development on Marton Moss.

The potential of the M55 Hub for a wider mix of uses, its increased range of available sites and its gateway location, combine to provide a realistically deliverable and more comprehensive focus for development and long term growth. House-builders views and past building rates both support a wider focus of development, rather than a more singular focus on Marton Moss within the timescale of the Core Strategy to 2025.

Comprehensive development would enable the more efficient provision of necessary new drainage infrastructure, together with a range of supporting shops, community facilities and services. The lack of adequate capacity of existing off-site public sewers available to deal with foul and surface water drainage remains a major issue.

A wider development focus on the M55 Hub would also safeguard to some extent some of the wider range of recreational, horse stabling and other urban fringe uses which still perform an important role on the Moss.

Fylde Council's position and eventual strategic development choice of its preferred option will clearly have major implications for the future delivery of this option.

Spatial Option 6 – Market Driven Approach

Objective

This considers what would be likely to happen without a focused strategy for development set out within the Core Strategy – effectively leaving it to the market to determine when and where development should best take place. This option does not provide a clear way forward.

Rationale

Where a Local Planning Authority fails to provide for an identified supply of land to meet its needs, then there will be a much increased likelihood that permission will be granted on ‘market’ sites identified and brought forward for development. Developers would logically focus on the easier and more readily developed opportunities, and seek to avoid more costly and difficult to develop sites.

A market driven approach is not realistically put forward as a serious option for development, but assessment of its implications usefully informs consideration of the options as a whole

Sustainability Appraisal

The key concern with this option is the lack of certainty that a market driven approach would bring. It is possible that many of the projects identified in options 1-5 together with their identified benefits and disbenefits could still be brought forward under this option, or indeed they may not. This uncertainty leads to an inability to plan strategically in a way that would enable benefits to be maximised and adverse impacts controlled and reduced.

It is not considered that such an uncoordinated approach to development would be in the best interests of delivering a sustainable Blackpool.

What the Community and Stakeholders told us

- There was very limited general public response to this option, which was not supported.
- Regional bodies and other organisations did not consider this option has any role to play. It was generally considered it would not provide the required coordinated and comprehensive approach to development essential to the proper planning of the area.

Option 6 Performance against Key Aspirations and Objectives

<i>Fundamental change/ regeneration of resort and residential core.</i>	The focus would be expected to be on easier to develop greenfield sites, and away from the more complex regeneration opportunities in the inner areas of Blackpool. It would fail to create any framework for the coordinated promotion and delivery of development and change where this is most needed in the town centre, resort core and inner areas of Blackpool. A market approach would not provide any substantial development stimulus to support Blackpool's regeneration.
<i>A range of high quality homes and employment in sustainable locations.</i>	A developer led market based approach would still deliver a level of new housing, focused more on greenfield development sites on the Blackpool eastern boundary – but with a lesser focus on regenerating the inner areas, town centre and resort core. There will also be expected to be a focus on higher value uses (such as retail and

	residential) as against meeting other needs (such as for employment development). The lack of a strategic planning framework would mean development would be brought forward in a more fragmented pattern, and such an uncoordinated approach would be less likely to tackle key problems and secure a sustainable future for Blackpool.
<i>Make most of built and natural environment, infrastructure and facilities.</i>	A market led approach would generally lead to a more fragmented approach to development. The Greenfield focus for development would have a more adverse impact on areas of ecological and nature conservation importance. The lack of a comprehensively planned development would reduce the effectiveness of the coordinated planning of supporting infrastructure, services and facilities, as part of a properly connected and accessible land use and transport network.
<i>Long term regeneration/ development of Blackpool & Fylde Sub-Region.</i>	A market led approach would provide no basis for the effective long term planning for Blackpool and the Fylde Sub-Region. It would undermine the planned coordinated development required to drive forward inner area regeneration, and potentially compete against it.
<i>The potential to deliver quality.</i>	Quality developments could still be brought forward on individual schemes. However, a market led approach would fail to provide any impetus for a much needed wider and more pro-active planned strategy to raise all aspects of environmental quality for the residents, visitors and businesses.
<i>Efficient transport and travel within Blackpool & Fylde Sub-Region.</i>	A market led approach would fail to provide any basis for the proper planning of a fully integrated transport system. There is a need to take a long term approach, focusing new development in the right locations and facilitating in advance the full range of transport requirements. Major highways and infrastructure improvements to the transport network would be severely compromised.
<i>The impact on wider infrastructure and services provision.</i>	A market based approach would similarly undermine the proper planning of effective services and infrastructure. It is essential to take a longer term view in determining the best way forward for the provision of supporting services and the proper planning of the area.

Market Overview and Deliverability

While easier to develop and more attractive sites would still come forward, a market based approach would be very ineffective in delivering the wider aims of the Core Strategy. It would provide no certainty, and fail to provide the required impetus for inner area regeneration, which is a fundamental aim of the Core Strategy.

Critically, in Blackpool, whether in the heart of the resort or on its urban edge, the multitude of ownerships and existing uses mean that efforts to deliver strategic levels of development will be massively undermined unless supported by a properly planned statutory framework as a basis for the Council, other public sector, and private developers to work together to facilitate development. Without this the ambitions of the Core Strategy for Blackpool's major change will not be delivered.

5. Context and Spatial Profile

Planning Policy Context

Chapter 3 of the Issues and Options document outlines the key planning policy documents taken into consideration when preparing the consultation document, and provides an overview of the key evidence base documents that have influenced the key issues and choices the Core Strategy will need to address. A number of general comments were received in relation to the Planning Policy Context section, in particular comments made reference to the position of the draft North West Regional Spatial Strategy at the time of consultation (the RSS has since been adopted) and identified the need to consider the strategy as an integral part of the development plan and given due consideration when assessing planning applications. In addition to the evidence base documents identified, a number of other documents were suggested for consideration, such as the Lancashire Economic Strategy; the Lancashire and Blackpool Visitor Economy Strategy and the evolving Fylde Coast Multi-Area Agreement.

Mini Spatial Profile of Blackpool

Representations received on the mini spatial strategy covered a range of topics and issues, as set out below.

Historic Development: English Heritage noted the omission of the Blackpool Tower from the profile and a number of key issues such as the need to find suitable uses for the town's significant buildings, such as the Winter Gardens, and the importance of ensuring new development in Blackpool is informed by and appropriate to its context.

Resort: Support was provided by Blackpool Pleasure Beach for identifying the vital role new leisure attractions and the upgrading of Blackpool's holiday accommodation will have on the renaissance of the resort, as set out in the *Resort* section of *Blackpool Today* (page 16). Further support was also given to the '*need to sustain a more all year round visitor market and provide new high quality attractions and improved accommodation to revitalise the visitor economy*' which was identified as a key issue for the resort.

Town Centre: Blackpool Pleasure Beach supported the key issue identified for the *Town Centre*, however suggested the Council needs to be flexible in terms of its approach to directing retail to the Town Centre and allowing leisure-based shopping to play a role in modern revitalised tourist attractions.

Transport and Travel: In addition to the key issue identified for transport and travel, Blackpool Pleasure Beach identifies a need to improve links from the M55/Yeadon Way to the South Beach Area. Further to this, Blackpool Pleasure Beach consider the existing visitor car parks, particularly those serving South Beach, to be inadequate in terms of connectivity and the number of spaces needed to support existing and future developments, and that this should be recognised.

General: Fylde Borough Council refer to the 'Blackpool Existing Spatial Profile' which identifies a main industrial area adjacent to Blackpool Airport which appears to be in Fylde Borough and that the Core Strategy for Blackpool should relate exclusively to its own administrative area. However, this is due to an inaccuracy with the borough boundary on the spatial profile and the identified main industrial area falls within the Blackpool local authority administrative area.

6. Vision and Objectives

Vision

The majority of responses received supported the vision, with only one response suggesting this is not the right vision for Blackpool but no further detail was provided to explain this view. In particular, support was given to the regeneration of the town centre and the diversification of the economic. Specific support was received to promoting tourism and creating a unique, year round 21st century visitor experience. Sustainable patterns of development were also supported, with an emphasis on sustainable new homes and jobs which do not undermine the vitality and viability of existing centres. References to open spaces and recreation were also welcomed.

A number of additional references were suggested for inclusion in the vision, such as the natural environment, climate change and renewable energy, the historic environment, and specific reference to town centre retailing.

Overall, the responses received agreed the Vision links with the aims of the Sustainable Community Strategy (SCS). However, one response did suggest the two did not link as parts of the SCS had not been adequately covered, such as reference to making Blackpool a strong, sustainable sub-regional centre for the Fylde Coast and to promote enterprise and support people into work. One comment suggested the aims are contradictory, referring to the potential for housing and road proposals to destroy the natural environment on greenfield sites.

Objectives

All responses agreed that the right objectives have been identified for Blackpool. Support was particularly given to the aim of developing Blackpool's role as a sub-regional centre; the commitment to re-establishing the town centre as a first choice centre; providing an enhanced all year round tourism product; and promoting balanced and healthy communities.

Overall, the objectives identified in the Issues and Options consultation document were supported as establishing a clear way forward, however a number of comments suggested additions to the objectives, such as the preservation and enhancement of biodiversity and the natural environment; the diversification of the economy; climate change agenda; retail and the town centre; and references to the historic environment. Emphasis was placed on the need for the objectives to be more spatial and locally distinct as well as deliverable by detailing how the issues identified are to be addressed.

7. Strategic Choices and Issues

This section of the Core Strategy Issues and Options document dealt with a range of specific strategic issues under a number of key themes which seek to inform the pattern and focus of Blackpool's future development. The key themes identified were:

- Housing regeneration and growth
- More balanced and healthy communities
- Resort regeneration
- Town centre regeneration
- Wider economic diversification
- Lifting quality in the built environment and enriching heritage
- Creating a greener Blackpool; and
- Transport and travel needs.

Housing Regeneration and Growth

This section focussed on Blackpool's future housing offer, in particular raising issues about how best to achieve the right mix of types and sizes of housing in new developments and the provision of sufficient and appropriate affordable housing.

Key Issue: To address housing market imbalances and revive our inner areas, whilst providing a wider mix, including more affordable housing.

Main Housing Focus

Responses generally recognised the importance of all the priorities identified to meet future housing needs and enhance Blackpool's housing offer, with the majority of responses suggesting each priority was either very or quite important. Particular support was given to the redevelopment of difficult inner areas regeneration sites and improving the inner Blackpool housing offer, with the majority of responses identifying this as a key priority.

There was a more mixed response to the importance of new homes in sustainable locations on the edge of Blackpool, with the dominant response suggesting this would be very important to meeting needs and enhancing the offer, but also suggestion this option should have no importance. Further comments suggested that best use is made of the existing stock to complement new build and support was received for the development of mixed communities.

Housing Mix

In order to ensure a better mix and balance of house types in Blackpool, responses supported setting out much more clearly the precise mix of different types and size of housing required on all large housing development sites. There was some support for continuing to require a mix in all but the smallest developments or to, alternatively, leave the mix of house types to the private sector. Comments received from regional bodies (the North West Regional Development Agency (NWDA) and 4NW) suggest a clear steer regarding the mix of house types should be provided by the development plan document, informed by the Fylde Coast Strategic Housing Market Assessment (SHMA), but that the private sector is best placed to determine the precise mix of housing types.

One Bedroom Accommodation

With regards to the Council's future approach to the amount of one bedroom flat accommodation, support was given to developing more restrictive policies, both in the inner areas and elsewhere in Blackpool, than are currently in place. Comments identified the need to diversify the residential stock, including the need for more new family dwellings.

Housing for Older Residents

Responses suggested specific policies dealing with housing requirements of the growing elderly population should be consistent with the need to plan for all housing need for the borough's population. Support was given to setting specific requirements so that future provision of specialist and supported housing for older residents is provided in both market and affordable housing.

Affordable Housing

The majority of responses considered that a mix of affordable housing types should be prioritised to meet Blackpool's needs. Regional bodies suggested the precise mix should be informed by the Fylde Coast SHMA, which places an emphasis on social rented housing to meet affordable needs but also with a role for intermediate housing as well.

A large proportion of responses suggested the future provision of new affordable housing should come forward across all areas of the town to ensure residents have access to different types of housing. There were suggestions that different targets across the borough should be considered to recognise the difficulties of securing affordable housing delivery in some areas to ensure that affordable housing could still be provided but ensure that development would also remain viable.

A mixed response was received regarding whether affordable housing provision should be provided on all sufficiently sized sites, but support was given for the option of not directly providing affordable housing on-site, and instead making off-site financial contributions to assist inner area regeneration. However, 4NW consider the provision of on-site affordable housing should be the priority in line with Government advice as set out in *Planning Policy Statement 3: Housing*, but recognised the need for flexibility in some cases.

Balanced and Healthy Communities

Key Issue: The need to develop sustainable, safe and healthy neighbourhoods with a diverse range of accessible facilities, and heighten residents' aspirations.

This section sets out the need to ensure that new development takes place in a way that best contributes to achieving more balanced and healthy communities across Blackpool as a whole. The section states that a balanced and healthy community should provide for a mix of age groups, incomes and lifestyles in a safe and clean environment, with a full range of supporting facilities.

What makes a Sustainable Community?

A number of key themes were identified as areas to be addressed to enable the creation of sustainable communities throughout Blackpool. Consultees were asked to consider if there are any other key issues relating to the creation of sustainable communities that should also be included. A wide range of issues were identified, but key amongst these were to recognise the diverse nature of communities, support greater community involvement, protect and enhance existing community facilities, provide better access to affordable public transport, and to support a vital and viable town centre in Blackpool.

Access to Facilities and Services

Consultees were asked to rate access to facilities and services in their local neighbourhood based on a scale of 1 to 5 (1 being excellent, 5 being very poor). The results were varied illustrating different perceptions on access to facilities and services in neighbourhoods across the borough, with individual results for each facility and services varying from 1 to 5. Responses suggested there is generally a good level of access to services and facilities such as doctors, pharmacies, hospitals, primary schools, community centres and local shops. More limited satisfaction was indicated regarding access to secondary schools and child care provision, and a mixed response to access to dentists with an even split of responses suggesting access is both excellent but also very poor in some neighbourhoods. Similarly, a varied response was received in relation to the accessibility of jobs in local neighbourhoods, with an overall a perception that access was very poor.

Consultees were asked to consider and identify the most important priorities for the improvement of facilities/services, which should realistically be brought forward, in their neighbourhood and in the town as a whole. A range of measures were proposed as priorities for neighbourhoods, with a focus on providing better access to local amenities such as Post Offices and local shops, improving the general appearance of neighbourhoods and increasing levels of greenery, alleviating congestion and providing regular public transport services. Improving training and job opportunities was also identified as a key priority, alongside focusing on the town centre and retaining and enhancing the retail offer.

Similar priorities were also identified for the town centre as a whole, such as improving training and job opportunities, improving public transport and parking, and encouraging employment and development in the town centre, and creating clean and safe place to visit. A number of additional priorities were also identified covering a range of diverse themes such as the provision of places to worship, promoting healthy lifestyles, encouraging community involvement and support for the development of conference facilities on the former Central Station site.

Access to Open Space

The majority of respondents considered they had adequate access to green open spaces from where they live. However, some concerns were raised in relation to spatial options which put forward some level of development on Marton Moss and the potential for loss of open space and as such, support was provided for the preservation of countryside areas. Further to this, Natural England stated that a strategy to encourage healthy lifestyles through improved access to green space would be welcomed, alongside a linked network of green spaces and the provision of more footpaths and cycleways and enabling access to local nature reserves and informal green space.

Other Improvements and Comments

A number of additional improvements were identified which consultees considered would bring about lasting positive changes in their neighbourhoods. This included support for the use of open space to encourage community activities such as allotments and suggestions for increased levels of visible policing.

A response received on behalf of the National Offender Management Service stated that, while there are no specific proposals for new prison development in Blackpool at present nor specific sites identified, in line with Government guidance requests that consideration is given to the inclusion of a criteria based policy to deal with a firm prison proposal should it arise during the plan period.

Community Safety

Perceptions of safety within local communities were mixed, with a number of suggestions put forward as to what could be done by the Council and its partners to improve the situation for residents who do not feel safe in their community. Overwhelming, responses supported more visible and increased police presence in communities to improve feelings of safety and a suggestion for improved street lighting in particular areas of the town.

For new developments, responses identified a number of measures which could be applied to improve security, specifically active police involvement, improved lighting, gating to the rear of properties, and the use of secure locks, alarms and windows.

Inner Area Regeneration

In terms of achieving a balanced housing offer in the inner areas, most of the suggestions put forward in the Issues and Options document were considered important, with particular support given to reducing the high levels of transience, restricting increased concentrations of multi-rented accommodation and the significant clearance and redevelopment of some areas. Less support was provided for increased shared ownership and increased social rented housing in the inner areas. Additional comments recognised the need to provide for a range of ages and to ensure there is an equal balance of housing across the town.

Of the factors identified as being important for inner area regeneration, the two preferred options were for the provision of more jobs in the resort, town centre and wider economy and improving the environment of the town and its neighbourhoods. Additional comments suggested all the factors identified were important and that a holistic approach is needed for successful regeneration. In addition to creating additional jobs, one comment suggested that the nature and quality of any new jobs provided is of great importance.

Resort Regeneration

Key Issue: The need to sustain a more all year round visitor market and provide new high quality attraction and improved accommodation to revitalise the visitor economy.

This section identified that Blackpool remains a mass visitor destination but recognised the resort's existing tourism offer will not reverse the decline in visitor numbers, and that if the resort is to re-establish itself as a successful and innovative tourism destination the prime need is for the development of new attractions and reasons to stay in Blackpool, with a complementary holiday accommodation offer.

Resort Focus

Support was given for Blackpool aiming to become a mixed market venue catering for a wide range of visitors. There was less support for Blackpool aiming to become a 'fun' short stay destination or a niche market resort for other specific groups of visitors.

Concerns were raised in relation to the impact of 'Stag and Hen parties' which were perceived to be a source of anti-social behaviour and detract families from the resort. A response made on behalf of Blackpool Pleasure Beach suggests that if the tourism industry is to be maintained and strengthened, it is essential that 'resort regeneration' and 'town centre regeneration' are addressed.

English Heritage state the town's special historic assets and distinctiveness will have a role to play in whatever future is planned for the town and suggest the impacts on existing historic buildings will need to be considered in any major new development and efforts made to secure viable futures for these buildings.

The Theatres Trust note that theatres can be a major tourist attraction and should be included within policies which promote tourist facilities. The Trust also identifies the importance of festivals and the summer season which can bring an economic advantage to the town. As such, the promotion of theatre uses as part of a relatively small development, was considered to have the potential to make a strong contribution to the character of the town and enhance the experience of those visiting the town as a tourist.

Market Sectors

A mixed response was received in relation to whether all areas across the resort should be marketed and developed to cater for a wide range of visitors with a similar response supporting 'yes' and 'no' options. The NWDA comment that any strategy seeking to promote certain areas for different types of visitors would need to be underpinned by robust research into different market segments.

There was, however, strong support for an increased emphasis on marketing and developing specific areas of the resort to appeal to different visitor groups, and promote their particular character and appeal. Specifically, Blackpool Pleasure Beach suggest that proposals which broaden the appeal of the resort to different market sectors should generally be supported.

Major Tourism Investment Sites

New Bonny Street/ former Central Station Site

Support was provided for a major new multi-purpose conference, events, or exhibition centre to be the priority for major investment on the New Bonny Street/ former Central Station site. A number of alternative suggestions were also put forward, such as a 'seafront university', a residential site or a mixed use development incorporating retail, offices and potential hotels and for the site to be expanded to incorporate the area bounded by Albert Road, Coronation Street, Hornby Road and Central Drive. Car parking was also considered an important element of any new development, with a suggestion that a new multi-storey car park is required. Another suggestion was to re-instate the railway line and re-open the site as Central Station.

The boundary identified for the New Bonny Street/ former Central Station site was contested by the Noble Group. The Group requested that their properties are removed from the Central Station Site boundary as it is considered there is no merit for their inclusion.

United Utilities highlighted potential issues with the site, stating they have records of internal public sewer flooding of properties in the vicinity of the site as a result of overloaded sewers, as such there is a need to reduce impermeable surfaces throughout this area to reduce surface water run-off rates.

'Second Gate'

With the 'Second Gate' no longer expected to come forward as a major tourism investment site, consultees were asked to consider the type of development that should be supported on the site. There was strong support for the eastern part of the site to be developed as a major new Blackpool Further Education Campus, with support also provided for longer term aspirations for full university status. United Utilities highlighted potential issues with the site, stating that they have records of internal public sewer flooding of properties in the vicinity of the site as a result of overloaded sewers, as such there is a need to reduce impermeable surfaces throughout this area to reduce surface water run-off rates.

For the western part of the Second Gate site, there was support for redevelopment to incorporate a wider mix of uses, including housing. Suggestions were also put forward for the site to be retained for Blackpool Transport tram and bus operations, with the retention and improvement of the tram depot with an attached visitor centre.

Opinion was split as to whether there is a need to identify a replacement second major tourism investment site (in addition to the former Central Station Site) to accommodate major new tourism attractions. A number of sites were suggested for consideration as a potential locations for tourism investment, including the Foxhall Square Area, an area incorporating Stanley Park, Blackpool Zoo and the De Vere Hotel, Whyndyke/Peel, and an area dedicated to performing arts which could include theatres and restaurants. Blackpool Pleasure Beach suggested proposals should be encouraged on other major sites that can provide similar regeneration opportunities, with the Pleasure Beach suggested as a replacement for the 'Second Gate' as it is already recognised as one of the major tourist destinations in the town and has the potential to offer new and extended facilities to enhance the role of Blackpool.

Holiday Accommodation

Evidence from the pattern of change in the resort is that the amount of holiday accommodation is considerably more than what is now required. Consultees were therefore asked to identify which areas, in their opinion, should be the main focus for an improved holiday accommodation sector and where the main focus for change should be.

Strong support was received for retaining holiday accommodation across all the identified Promenade areas, however for the Central Promenade area there was also some support for change from holiday accommodation. Elsewhere, the response was slightly different. There was support for retaining holiday accommodation between Bispham to North of Gynn and South of Gynn to Talbot Square, however in the areas of South of Town Centre, Foxhall and Manchester Square to Alexandra Road some change from holiday accommodation is supported. For the area South of Alexandra Road to Pleasure Beach equal support was received for a mix of change and retain, but also change from holiday accommodation. Views on the area South of the Pleasure Beach were mixed with equal support given to retaining but also changing from holiday accommodation.

The NWDA comment that it is evident there is an over provision of holiday accommodation within the resort, with some of the older stock being unsuited to current standards of accommodation, as such the Agency would seek an improvement in the quality of the accommodation offer particularly through Lancashire and Blackpool Tourist Board's work with accommodation providers. The Agency recognises that whilst some of the stock will leave the market, it is difficult to point to broad areas because, as the consultation paper acknowledges, "there are differences between street to street" within different parts of the resort.

The Lancashire and Blackpool Tourist Board, similarly, supports the raising of standards within the holiday accommodation sector, and recognise that where an oversupply of holiday accommodation exists there may be a need for an appropriate change of use for these properties to reduce the overall stock.

A response received from a guest house owner suggested that due a fall in the number of staying visitors some businesses were having difficulty continuing to trade and that there is some demand for change of use from holiday accommodation to residential uses.

The Blackpool Pleasure Beach state that potential exists within the Pleasure Beach to provide new holiday accommodation, with the success of the Big Blue demonstrating that the opening of higher quality hotels has acted as a catalyst for the upgrading and improvement of other hotels in the town.

A response made on behalf of Bourne Leisure (Marton Mere Holiday Village) considered that in terms of holiday accommodation, a key issue will be to ensure there is a range of high quality accommodation, including caravan and holiday parks providing the most up to date caravans and chalets. Bourne Leisure, therefore, suggest the Core Strategy should recognise the importance of caravan and camping sites in enhancing Blackpool's tourism offer, with policies supporting the enhancement of existing parks and the provision of new parks to cater for a broader cross-section of visitors.

Major Conference Facility

Blackpool will continue to provide for a wide range of conferencing, including hotels offering a range of in-house facilities for small-medium conferences. Questions on major conference facilities were in relation to that role, but also regarding the future of the town as a major conference venue.

Consultees were asked whether they considered Blackpool to have a viable long-term future as a major destination for the following types of conferencing and events: major annual political, white collar business, blue collar/trade union, exhibitions, niche conferencing, and social events. Considerable support was given to each type of conferencing, with exhibitions, blue collar/trade union, and niche conferencing being the preferred types of conferences and events.

Consultees were then asked to consider the same types of conferencing in relation to three possible options for a major conference venue: with the existing Winter Gardens facilities; major Winter Gardens upgrade; or with a new conference centre. With the existing Winter Gardens facilities, consultees considered that social events could continue to have a viable long-term future, however it was felt that in the future major annual political or white collar business conferences could not be accommodated by the existing facilities. It was considered that with a major upgrade to the Winter Gardens there could be a long-term future for niche conferencing, exhibitions, and social events, and with a new conference centre it was considered there could be a long-term future for major annual political, white collar business, blue collar/trade union, and exhibitions.

Town Centre Regeneration

Key Issue: To make the town centre the heart of the Fylde Coast urban area transforming its offer, environment and supporting facilities.

In recent years there has been increasingly intense competition from other centres and out of town shopping, which combined with a decline in visitor numbers, has led to a decline in the town centre offer relative to other centres, with a need to improve the quality of the shops, environment and supporting facilities. This section therefore sought views on how to make the town centre the heart of the Fylde Coast urban area.

Major New Development

Consultees were asked to consider the most important developments to be pursued to make Blackpool a more successful town centre. Overwhelming, the strongest level of support was for the redevelopment of the Talbot Gateway area and the rejuvenation of the Winter Gardens. However, support was also provided for the other options put forward such as town centre expansion onto the former central station site and redevelopment of the former central station site for a major new mainstream tourism attraction. In terms of other major development, one suggestion was to extend the South Fylde railway line to a new Central Station.

Modus Developments (Houndshell Shopping Centre) suggest that, in line with the introductory sections of the Core Strategy, Blackpool has underperformed as a retail centre and has been losing trade to out of town stores and other centres as a result, and that there is a need to improve the quality of the shops on offer and the town centre environment and fully supports the recognition of the need for greater connectivity across the town centre. Modus Developments suggest that investment in the Houndshell Shopping Centre has had a role in helping to redress past decline. The redevelopment of the Talbot Gateway area is recognised as important but that the content of the scheme must complement the retail and leisure attraction of the remainder of the centre.

A response made on behalf of Sainsbury's supports the aspiration to make the town centre the heart of the Fylde Coast urban area transforming its offer, environment and supporting facilities but that this must be balanced with the need to ensure other centres in the borough continue to grow and secure investment to meet the needs of the communities they serve. Sainsbury's support the redevelopment of the Talbot Gateway area and considered this to be the most important development in making Blackpool a more successful town centre.

Supporting Changes

Consultees were asked to consider which supporting changes are important to making Blackpool a more successful town centre. The two most popular choices were the creation of an enhanced public realm, with visually interesting paving, lighting, landscaping, street sculptures, public art and focal features, and the growth of modern 'city living' residential apartments within and on the edge of the town centre.

Winter Gardens

Overall, support was received for the continued use of the Winter Gardens as a mainstream theatre/event venue, but also for additional alternative uses such as the introduction of attractive indoor retail arcades, and use as a themed local/ national museum of leisure and entertainment.

Whilst some support was provided for use as a small or large casino and hotel use, there were a number of responses that did not support any such alternative uses for the Winter Gardens.

A number of individual comments stressed the importance of the Winter Garden's heritage and grade II* listed status, and requests were received from the Theatres Trust and English Heritage for a Conservation Management Plan to be prepared, alongside the retention of features such as the Empress Ballroom, Opera House and Spanish Hall. One response considered that for the greatest prospect of success the Winter Gardens should be a flexible multi-use facility that could include any of the specific uses identified.

Leisure Parcs (operator of the Winter Gardens) supported the continued use of the Winter Gardens as an events venue, but considered there to be no demand for a mainstream theatre. Leisure Parcs endorsed the aspirations of the Core Strategy and considered that the regeneration of the Winter Gardens site to provide enhanced facilities for existing uses together with additional development to accommodate new uses can and should play an important role in realising such aspirations. Leisure Parcs further states that the site has a long history of evolution and adaptation to cater for the needs of the times and this process must continue if it is to play its part in effectively meeting the needs of the 21st Century.

Talbot Gateway

Whilst no specific questions were asked in relation to the Talbot Gateway area, two comments were received. A response made on behalf of Wilkinson Stores considers the store to currently be the main retail anchor within the Talbot Gateway area, and combined with the associated car park makes a significant contribution to the locality. The response suggests the Wilkinson store plays an important role in the Blackpool economy and as such should be taken into account in local planning policies. The response goes on to say the Core Strategy is too focused on new housing development and should fully reflect the retail planning requirements of the emerging North West Plan (Regional Spatial Strategy) to a greater degree. The response states that the section in the consultation report concerning Talbot Gateway simply seeks to develop the area 'in accordance with the Council's earlier adopted Talbot Gateway Planning Brief', and contains no questions and therefore considers that Blackpool Council does not want to receive any consultation responses on this matter and suggests this approach is flawed.

A response received on behalf of Her Majesty's Courts Service (HMCS) fully supports the reference to Talbot Gateway as the *town's key edge of centre development opportunity site*, along with the support for the range of supporting acceptable uses, which include community facilities such as a court building.

Future Major Retail Development

In the context of competing uses for the limited space available, and continued longer term retail growth, views were sought on whether Blackpool town centre should be the continued focus for all major non-food retail development (subject to appropriate sites being available) and whether future expansion of traditional bulky goods retailing should be more generally permitted on existing out of centre retail parks. Considerable support was received for both options.

Further to this, a response received on behalf of Blackpool Pleasure Beach suggested that where opportunities arise for retailing which can assist in broadening the retail base of the town coupled with redevelopment opportunities which assist broader objectives such as tourism development, these should be identified and encouraged. The response supports Blackpool town centre continuing to be the focus for all major non-food related retail development, but suggests the Core

Strategy must recognise that as a major resort destination, Blackpool does not operate in the same way as most urban centres. As such, it is considered by Blackpool Pleasure Beach that it may therefore be acceptable to bring forward non-food retail development that is aimed primarily at the tourism market in locations outside the town centre where they are related to a major tourist attraction. The response states that Blackpool Pleasure Beach already has a large amount of retail, both within the park and at Ocean Boulevard, and whilst it is not considered appropriate that the Council permits further substantial unrestricted A1 retailing at the park, there is in Blackpool Pleasure Beach's view the potential for tourism related retailing (such as a factory outlet, end of line products, seconds, gifts etc.) where this is ancillary to the park.

A response made on behalf of Modus Developments (Houndshell Shopping Centre) considers that Blackpool town centre should be the continued focus for all major non-food retail development and that without this clarity of advice, a potential resurgence of the retail offer of the town centre may not be realised. Modus Developments also considered that bulky goods retail will be preferable on the edge of the town centre rather than new or expanded out of town facilities.

A response received on behalf of Tesco Stores Ltd suggests that the Local Authority should also make a commitment to allowing appropriate retail development elsewhere in the borough (outside the town centre) so long as the appropriate tests within PPS6: Planning for Town Centres are satisfied, to ensure that main food shopping facilities are accessible to all.

Wider Economic Diversification

Key Issue: To diversify the economy by the provision of quality opportunities for new employment development to provide more and better paid jobs.

The Blackpool Core Strategy aims to develop new dimensions and diversity in Blackpool's business economy, and therefore this section sought views on where priority should be given for new employment opportunities and also the future of main existing employment estates and unallocated smaller industry/ business locations.

New Employment Opportunities

The 2007 Employment Land Review undertook a comprehensive assessment of the demand and supply of industry/ business land to meet Blackpool's future needs to 2021. It assessed in detail the existing employment sites and identified a need for a further 40 hectares of employment land to meet future needs in or on the edge of Blackpool.

Consultees were asked to consider a number of options identified to improve Blackpool's employment opportunities and rate their importance. Many of the options outlined in the consultation document were considered very important, namely to safeguard and regenerate main industrial estates, support a stronger employment focus in the town centre, provide high quality sites on new business parks, expand opportunities around the M55 Junction 3, and to expand opportunities around Blackpool Airport. Less importance was attached to improving Blackpool's employment opportunities through greater reliance on commuting to Preston and Manchester.

Lancashire County Council raised concerns in relation to the identified employment land requirement. The response refers to the identification, within the Blackpool Employment Land Review, of a requirement for an additional 40 hectares of employment land over the period 2007-2021, equating to 2.9 hectares per annum. The response suggests this is a significant proportion of the County allocation, as set out in the emerging RSS, and may have implications in terms of meeting indicative supply for the County as a whole.

The North West Development Agency note that the final point, which refers to 'more reliance on commuting to Preston and Manchester', does not differentiate between car-borne commuting and public transport.

A response made on behalf of the Royal Mail suggests the Local Authority should make reference to the emerging Planning Policy Statement 4: Planning for Sustainable Economic Growth and to consider how it could apply to Blackpool.

A response made on behalf on ING Real Estate identifies an interest in land north of Blackpool Airport at Squires Gate Industrial Estate, and suggest ING Real Estate wish to bring forward a comprehensive mixed-use development at the site. The response regards the provision of high quality new business parks and expanding opportunities around Blackpool Airport as a key driver for economic growth.

Main Existing Employment Estates

There was general support for the retention and improvement of land for continued industrial and/or business use on Blackpool's main employment estates.

A response made on behalf of ING Real Estate gives general support to the retention and improvement of land for continued industry/business use on Blackpool's main employment estates where sufficient market demand exists, however refers to considerable development pressures within Blackpool which derive from the shortage of developable land and in order to promote the effective use of urban land, sites should be considered for safeguard on an individual basis. The response suggests, however, that it should be recognised other uses may be necessary to enable the improvement of business space and provide for market demand, and as such, safeguarding employment land should only be considered where justified by the demand for industrial and business space. The response goes on to say that, redundant, poorly used or dilapidated employment land should be considered for alternative land uses where it can be demonstrated that sites are no longer providing a positive contribution to the local economy and where the existing use is no longer viable. Furthermore, the response suggests that in doing so urban land can be freed for the development of alternative land uses thereby reducing pressure to develop greenfield land.

Unallocated smaller industry/ business locations

With regards to unallocated smaller industry and business locations, responses considered that the redevelopment of inner area industrial premises should generally be encouraged (realistically, mostly for residential use) and should be considered on a site by site basis for re-use and redevelopment of problem premises, but generally safeguarding viable employment sites. Less support was given to retaining such premises as important employment locations.

Lifting Quality in the Built Environment

Key Issue: *To address the poor quality of the urban environment, improve the streetscape and make better places and spaces.*

It is recognised that many aspects of the built environment are failing to meet people's expectations through poor condition, age and under-investment. This section therefore sought views on aspects such as the importance of urban design, local distinctiveness, and identifying areas for enhancement, regeneration and change.

Importance of Urban Design

A large proportion of the responses considered that achieving high quality urban design is very important to the future regeneration of Blackpool. Specifically, Natural England suggested that achieving high quality and *sustainable* design and construction is vital to secure a sustainable future for Blackpool.

Local Distinctiveness

The majority of responses considered that greater attention should be given to ensuring future development reflects the distinctive character of Blackpool. English Heritage's response agrees that 'the core strategy will be fundamental in setting out the importance on places achieving high quality new design and the valued historic character of the resort' and suggests that Blackpool, as the world's first purpose built seaside resort for the industrial working classes, has considerable historical and architectural value.

The historic value of Blackpool's built environment was emphasised by other comments suggesting Blackpool should retain its 'Victorian seaside resort' heritage and new developments should adhere to a 'Blackpool Style' to enhance iconic buildings such as the Tower and Winter Gardens, but also that 'fun' architecture with the 'wow' factor should be supported. Further comments support area character analysis and Natural England suggest Blackpool's future development needs to respect and reflect local distinctiveness and this could be promoted through a Supplementary Planning Document.

Areas for Enhancement

Consultees were asked to consider which, if any, areas of Blackpool should be safeguarded and enhanced by future design policies. A range of areas were identified, including:

- The area around Stanley Park and Whitegate Drive,
- Resort areas such as Foxhall Village, South Beach, Pleasure Beach, North and New South Promenade areas,
- Heritage sites such as the Tower, Winter Gardens and Piers,
- The Town Centre,
- Norbreck, and
- Marton Moss.

Areas for Regeneration and Change

Whilst the Council is committed to lifting the quality of the built environment across Blackpool, consultees were asked to identify two areas from a number of options considered to be most in need of change and new investment. The majority of responses identified the Promenade and Town Centre as the two key areas in need of change and investment.

Consultees were then asked to identify any other more specific local areas of Blackpool that require greater investment in the design quality of buildings and public spaces. A number of areas were identified, including:

- Significant support for Central Drive and the immediate surrounding area,
- Foxhall,
- Layton,
- Watson Road, Waterloo Road, Lytham Road and St Annes Road, and
- Gynn Gardens

Heritage v Modern Development

Consultees were asked to consider to what extent a number of identified options would contribute to the quality and richness of the town centre. Overall, there was considerable support for a mix of approaches which responds to the different character in parts of the town centre.

English Heritage stated that the section heading (Heritage v Modern Development) was an unfortunate title which is considered an outdated precept, as it is perfectly possible to accommodate change and development in historic areas. The response states further that English Heritage agrees there are opportunities for new development in Blackpool but that this must be informed by the special character and qualities of the town and that new development should reinforce rather than undermine the viability of existing historic assets.

A Greener Blackpool

Key Issue: To manage change to make the most of Blackpool's natural assets, balancing the requirement for new development with environmental interests, including the impact on climate change and our carbon footprint.

This section stated that *“the extent to which we can substantially change the amount of greenspace in much of Blackpool is limited. Redevelopment to create new open spaces in existing urban areas where there is no open space is hugely expensive and, in cost terms, much less can realistically be achieved compared to new development locations”*. In light of this statement, views were sought on how inner area neighbourhoods could be 'greened', how underused open space can be enhanced and utilised, identifying areas for nature conservation, and also consideration of aspects such as climate change and renewable energy and energy conservation and efficiency.

Greening Inner Area Neighbourhoods

Consultees were asked to consider the two most important priorities for 'greening' the existing inner area neighbourhoods. All the options identified have the potential to make important contributions to the inner area neighbourhoods, however the two preferred choices identified were for closer community involvement in the management of the nearest neighbourhood park and to create a greener, safer and more attractive streetscene environment and reduce the impact of traffic in residential streets.

New Greenspace Priorities

In terms of new housing developments, consultees attributed great importance to the provision of more informal natural parkland with woodland, meadow areas and pathways. Responses also indicated that the other options presented were also considered important, such as providing a wide range of local children's play areas locations within housing areas, larger neighbourhood recreation grounds and parks, landscaped amenity open space within all sufficiently sized developments, and sports pitches and changing facilities close to new housing areas.

Sport England seeks a planned approach, complemented by the protection of existing facilities and provision of new ones, where appropriate, and suggest it is critical policy is founded on an up-to-date picture of open space provision and use.

Natural England state that future development in Blackpool should be sustainable and secure win-win outcomes with no net losses. Natural England suggest there is an opportunity to conserve and enhance green spaces for biodiversity, recreation, and mitigation of climate change and this should be reflected in policy with green spaces recognised as 'multi-functional' rather than for just a single use. Natural England consider that all major new development should make a contribution to open space either on-site or by way of a contribution to off-site provision, and advocate new development meeting a variety of green space requirements, including that there is a green space within 300m of every home.

Underused Open Space

In terms of underused space, the responses supported the redevelopment of underused neighbourhood open spaces in order to enable overall enhancement of the open space and to also enable alternative greenspace provision in areas with little or no existing provision.

Natural England considered that where open space is underused by the community the Council should investigate the reasons for this and that such spaces should not be automatically redeveloped for alternative uses. Instead underused green space should be improved to serve functions the local community require.

A response made on behalf of the Co-Operative Group suggests the council's current approach to the redevelopment of existing allocated open space is overly restrictive given there is no up to date open space audit, therefore the Core Strategy should take a more pragmatic and less restrictive approach where there are clear benefits from a site's redevelopment or where it can be demonstrated that open space is underused.

Natural Environment

Consultees were asked to consider if there are any other sites of particular nature conservation and environmental interest which should be protected and enhanced. A number of suggestions were put forward, including Marton Moss, Stanley Park, the Cliffs from Gynn to Anchorsholme, Staining, the Yeadon Way embankment, and the Blackpool South railway line. The Lancashire Wildlife Trust note it is possible that future additional sites of biodiversity importance (further to those set out in the Blackpool Nature Conservation Statement 2008) may be identified by local naturalists and members of naturewatch/BEAT.

Natural England would welcome reference to designated sites of nature conservation interest, protected species, Biodiversity Action Plan Species and Habitats and the Council's Biodiversity Duty under the NERC Act. Further to this, Natural England state that protection should be afforded as appropriate to designated sites and policy should provide for the protection of sites where interest is not known in advance.

A response made on behalf of Bourne Leisure Ltd notes that the Marton Mere Holiday Village adjoins the Marton Mere Local Nature Reserve and suggests future Core Strategy policies should recognise the need to balance policies to protect the environment with economic policies promoting tourism development, where such development would be acceptable, where it does not have a significant and harmful impact on the nature conservation value of the land and where appropriate mitigation measures for dealing with such impact, such as the inclusion of a buffer zone or detailed design measures, can be provided. Furthermore, in relation to flood risk Bourne Leisure consider the emerging Core Strategy should allow extensions /improvements to existing tourism accommodation uses that are already sites in waterside locations to be considered in relation to their overall planning benefits, compared with the existing development.

Climate Change and Energy Requirements

4NW are supportive of the Council's attempts to mitigate and adapt to climate change including reference to sustainable modes of transport but recognise in Blackpool there are issues around the use of renewable sources on buildings due to the area being highly built up, however the use of renewable energy sources should still be encouraged where possible.

On-Site Renewable Energy Needs

National guidance states that local planning authorities may include a policy that requires a proportion of the energy needs from all new developments to be met from on-site renewable energy sources. Consultees were asked to consider whether in principle Blackpool should be seeking to apply national minimum targets for the supply of renewable energy or set higher targets

for Blackpool. Support was given for both options, but the majority of responses considered that Blackpool should seek to apply national minimum targets.

Concerns were raised that requiring higher than national requirements may hinder investment and affect the viability of development proposals. However, there was also support given to higher targets, with the suggestion that the national minimum should be the baseline but where possible to negotiate higher targets subject to viability. Further to this, the Fylde Bird Club suggests the national targets are too low to make any real difference, and that Blackpool could further exploit wind energy and introduce exploitation of wave power.

Lancashire County Council refers to Policy EM8 of the RSS which sets targets for renewable energy in Lancashire, and suggests that monitoring carried out at the County level has identified there is likely to be a significant shortfall in meeting the 2010 targets in Lancashire. Therefore it is suggested that in working towards the RSS targets there will need to be an increase in the provision of renewable energy across Lancashire. The response refers to a study from 2005 titled 'Landscape Sensitivity to Wind Energy Development in Lancashire' (carried out on behalf of Lancashire County Council, Blackburn with Darwen Borough Council and Blackpool Council), which identifies areas to the south and east of the urban area of Blackpool suitable for small, medium and possibly larger scale wind and energy development.

Wind Turbines

One potential energy source is wind energy, already evident in Blackpool, with off-shore wind farms, and small turbines on some individual buildings. Respondents were asked to consider, presuming wind turbines are proved efficient and cost effective, which locations would be suitable for further provision of appropriately sized and located wind turbines.

Some level of support was provided for wind turbines to be appropriately spaced and dispersed along the promenade and coastal provision restricted to offshore wind farms. A number of locations were not supported by the responses, such as seafront provision concentrated in one or two appropriate locations, appropriate provision on suitable larger/taller buildings or appropriate provision in most new developments. A large number of responses disagreed that no further provision of wind turbines should be provided in Blackpool.

Natural England did not wish to promote one location above another, but request that due regard is give to the landscape and visual impact on species including birds and bats.

Energy Conservation and Efficiency

North West Regional Planning Policy currently requires building materials, insulation, energy, heating and lighting for new housing development to be built to the following minimum energy efficiency standards: Level 3 by 2010 (Code for Sustainable Homes), Level 4 by 2013, and Level 6 (Zero Carbon by 2016).

The consultation sought views on whether, in principle, consultees consider Blackpool should be seeking to apply the regional minimum energy efficiency standards or set higher targets. The response was split with equal support given to each option. In terms of applying the regional minimum energy efficiency standards, the responses suggest there is no need for higher targets and that other areas should be concentrated on first prior to energy efficiency. One comment provided support for applying regional targets, citing the extent to which regional targets can be exceeded needs to be carefully balanced against the need to encourage investment and the viability of the development proposals.

Responses made in support of setting higher standards referred to the coastal location of Blackpool and emphasised the role wind and wave energy could play. Support was given to making Blackpool a greener and more eco-friendly town. One response suggested that the regional targets were too low to make a real difference, therefore Blackpool should apply higher targets, with another comment suggesting the regional minimum efficiency standards should be the baseline, but with aspirations set higher.

Transport and Travel

Key Issue: To make a better connected Blackpool well served by sustainable modes of transport, with easy access to jobs and local services and a more integrated pedestrian and transport network.

An effective and sustainable transport system for getting to and from and moving around Blackpool is essential to the town's future development and quality of life of its residents. This section therefore sought views on identifying transport priorities, including priorities for pedestrians, cycling and parking. Specific views were also sought on the future of the Promenade, Blackpool South Station, the Tramway and Blackpool Airport.

Transport Priorities

Consultees were asked to consider which two transport priorities should form key elements of future transport planning and help to meet future travel needs of Blackpool residents. Of the identified priorities the two that were considered most important were to prioritise investment in public transport and to manage the impact of future travel needs but accept car travel and congestion will increase. Limited support was given to introducing higher price controls to discourage car travel and car parking and prioritising improvements for pedestrians and cyclists.

A number of additional comments were received in relation to tourism – this included suggestions that car parking provision for tourists should be expanded as part of a wider strategy and that while prioritising investment in public transport is important, policies should recognise that, particularly in relation to tourism, there may be a reliance on the car for many tourism journeys.

Wyre Borough Council state that transport links between Blackpool and Wyre are an important consideration in ensuring that the function of Blackpool as a sub-regional centre on the Fylde Coast is effective. Furthermore, efficient bus services and effective cycle ways between Blackpool and Wyre are important for promoting sustainable transport.

A response received on behalf of Royal Mail suggests that consideration should be given to how any proposed traffic management schemes would impact on the operational needs of the business. The response requests that any proposed public transport schemes advocated by the core strategy do not undermine the manoeuvrability of the Royal Mail and to ensure that Green Travel Proposals do not negatively impact on movement and accessibility to sites.

Natural England endorse investment in public transport and other modes of sustainable travel including walking and cycling, but do not wish to prioritise improvements for cyclists above pedestrians or vice-versa and therefore consider they should be treated in the same manner.

Pedestrians

Consultees were asked to consider priority locations for improving the attractiveness of walking in Blackpool, with support provided for the town centre and the promenade/seafront. In terms of what priority improvements should be made, suggestions included improvements to crossing points and the public realm, well maintained surfaces, better signage and ensuring pavements are even, and providing sufficient car parking.

Cycling

Consultees were asked to consider a range of measures which would accommodate an increase in cycling opportunities. Of the options presented, the greatest level of support was given to providing dedicated off-road cycles routes totally separate from the highway network (such as on the Promenade) and more demarcated cycle lanes generally sharing the existing residential road network. Less support was given to measures for more demarcated cycle lanes sharing the existing main road network, segregated cycle lanes alongside the existing road network and for more demarcated cycle lanes generally.

Additional comments suggest cycling should be encouraged on the promenade so that new cyclists feel safe, but also that more inland cycling routes are needed to provide alternatives to the promenade, particularly in adverse weather conditions.

Parking

A number of locations were identified which consultees consider the Council should prioritise car or coach parking improvements, including:

- The town centre, particularly near the main shopping areas
- Talbot Gateway
- Lonsdale Coach Station and Central Coach Park
- On the Promenade and near to hotels and leisure attractions
- A park and ride scheme based at junction 4 of the M55
- Coach parking at the Pleasure Beach
- An interchange with bus and trams at Starr Gate and Gynn Square.

Further to this a number of comments received suggesting that a number of car parks were in need of updating (such as Lonsdale and Central coach parks). Furthermore, the NWDA commented that Blackpool is the biggest attractor of coach business to the region however, it is suggested that Blackpool is also the destination attracting the most criticism from coach operators.

In terms of what these improvements should be, support was provided for park and ride facilities located at junction 4 of the M55 but also closer to the town centre so that car parking could be reduced within densely packed streets. Concerns were raised regarding the existing provision of car parking which in places is considered inadequate and that such spaces should be protected and where possible additional spaces should be provided in accessible locations.

Respondents were also asked to consider whether car parking should be reduced in any areas. A number of responses suggested there were no areas where car parking should be reduced, however one comment did suggest a reduction of car parking spaces in the town centre.

The Promenade

Consideration is being given to reducing the Promenade from a 4 lane to a 2 lane highway in the town centre to improve pedestrian connectivity and better integrate the key seafront with the main town centre shopping and leisure frontage. At times of special events, through traffic would be diverted off the Promenade (between Chapel Street and Springfield Road).

A range of views were received regarding this proposal, the key comments raised were:

- The Promenade is currently a barrier between the sea and town centre shopping area for pedestrians, the proposal would make the Promenade more accessible

- Currently too much traffic on the Promenade (particularly around Talbot Square and the Tower), this proposal would make the Promenade more accessible and pedestrian/cyclist friendly
- The Promenade could be closed completely to cars but with full access for buses and taxis.
- The Promenade is a major north-south route used by commuters and tourists alike. Concerns that reducing the lanes may increase congestion and discourage people from coming into Blackpool
- Concerns raised regarding access for emergency vehicles
- The proposal needs to be the subject of a detailed study to ensure it does not harm the ability of tourists to access attractions

The Tramway

The provision of a modern efficient service and the retention of its heritage interest are both seen as complementary elements of a successful future Blackpool Tramway, but respondents were asked to consider what should be the most important emphasis of future improvements to maximize tramway usage. Overall, support was provided for the complementary retention of heritage trams alongside a modern core service.

In the longer term the potential may exist (subject to major investment) to further improve the connectivity of the tramway as part of a wider Fylde Coast tram network. To improve connectivity and use, at a potentially high cost, respondents were asked to consider how important they considered a number of proposals to be. Responses indicated that all the proposals identified were considered important for improving connectivity and use, with support particularly given to a new tram spur off the seafront linking to Blackpool North Railway Station. Wyre Borough Council supports reference to extending the tramway into Fylde, but also state it is important the service to Fleetwood is upgraded.

Blackpool South Station

Consideration has been given in the past to the relocation of the Blackpool South Rail terminus between (or at) Blackpool Pleasure Beach and the existing Blackpool South Station. Truncation of the line would in rail terms have a negative impact, but in wider terms could significantly improve connectivity between South Shore and the residential areas to the east and better integrate pedestrian links, parking areas and land uses.

Mixed views were received on relocating Blackpool South Station, some support was given as this was considered to offer an opportunity to connect the tram system to the South Fylde line and the possibility of a tram service to Kirkham. Further to this, a comment received on behalf of Blackpool Pleasure Beach provides support for the ongoing consideration of relocating Blackpool South Station to assist in improving linkages between the main parking areas and the Blackpool Pleasure Beach. However, comments were also received which did not support the relocation of the Blackpool South Rail terminus stating that there are no obvious benefits and that the current location of stations is suitable and if anything the line should be extended to the town centre.

Blackpool Airport

Blackpool Airport lies outside Blackpool Council's administrative area. However, its future development is vital to Blackpool. The Airport has produced a Master Plan that proposes major increases in flight and visitor traffic.

Overall, the majority of responses were supportive of major expansion at the Airport over the next 10-15 years. Further comments suggest the airport is vitally important to Blackpool and is viewed as a means of securing economic development within the town. However, some responses raised concerns regarding the potential for increased noise and traffic, the potential risk of the airport losing routes if flights become more expensive, and also questions regarding the potential extent of expansion particularly given the close proximity of airports in Manchester and Liverpool.

Other Proposals

Respondents were asked to consider whether there are any other major transport proposals Blackpool should be promoting through its Core Strategy. A number of suggestions were put forward, including:

- Additional car parking
- Hybrid tram systems to utilise the South Fylde and Thornton railway network
- A new bus and coach station
- Support for private car use
- Fylde Coast Easterly By-Pass
- Electrification of the railway line
- Park and Ride at junction 4 of the M55
- Additional public transport services

8. Conclusion and Way Forward

The Preferred Spatial Option

The examination of strategic choices available to Blackpool against the various spatial objectives for the Core Strategy has highlighted the strengths and weaknesses of each of the main options.

From this evaluation, it is concluded that the following strategic options should be discounted:

- Option 1 Urban Concentration
- Option 3 Peripheral Suburban Expansion
- Option 6 Market Driven Approach

Option 1 Urban Concentration has only limited merits, with concerns about any substantial further intensification of development within the existing urban area.

Option 3 Peripheral Urban Expansion is less well located to meet strategic needs and raises more environmental concerns than other alternatives.

Option 6 would fail to provide for any effective planning of Blackpool's future development, and would undermine its regeneration.

As has been emphasised, the choices available for Blackpool are very limited and it was recognised at the outset that the eventual preferred option is likely to be a matter of finding the right balance. It is concluded that the foundation of the Core Strategy must be based on a mix of the other three options:

- Option 2 Inner Area Regeneration
- Option 4 Marton Moss
- Option 5 Wider M55 Hub Growth Point

Fundamentally, the Core Strategy must prioritise regeneration, whilst providing the impetus for Blackpool's wider economic development and housing growth.

Option 2 (Inner Area Regeneration) targeting growth and development on the inner resort, town centre and residential core, is essential if the Core Strategy is to help bring about the radical economic, social and physical change required – but without also providing new homes and jobs in sustainable locations on the edge of the existing urban area, it will not meet the community's needs and deliver the wider Vision of a New Blackpool.

Option 4, Marton Moss, is not favoured as a single focus for expansion as it would not effectively support the much needed wider economic growth, and could not realistically or desirably come forward as a single comprehensive development focus within the timescale of the Core Strategy to 2025.

Option 5, Wider M55 Hub Growth Point, provides a major development focus with a greater quantum and choice of development sites and potential for a mix of uses and longer term growth. A substantial focus for expansion on Marton Moss, however, would remain essential as part of a wider growth point development focus in and on the edge of Blackpool around the M55 junction.

The potential inclusion of the wider M55 Hub as part of the preferred option, however, is equally dependent on the decisions of Fylde Council. Fylde's Core Strategy Preferred Option has yet to be determined, with the Fylde Issues and Options report due to be published later in 2009. Closer alignment through joint working will be important in the development of a coordinated future development strategy for lands on the Blackpool/ Fylde boundary.

All of the broad Core Strategy spatial options for Blackpool included some level of expansion in south east Blackpool, including lands on Marton Moss. Work has been jointly commissioned by Blackpool/ Fylde from consultants to help further inform more detailed options for a wider M55 Hub Growth Point and help determine the most appropriate development strategy for these lands.

Strategic Choices and Issues

The responses received on the Strategic Choices and Issues section will inform a detailed way forward as part of a preferred option document covering aspects such as housing, resort and town regeneration, economic diversification, lifting quality and greening Blackpool and accommodating transport and travel needs.

The Way Forward

The Issues and Options consultation document represented the first part of a process to scope all issues the Core Strategy needs to address. The information gathered and representations received from this consultation will be used to inform the next stages of the Core Strategy

The next stage in the process will be to prepare the Preferred Option Core Strategy which will set out the preferred way forward for Blackpool's broad spatial development and growth informed by the Issues and Options consultation. The Preferred Option Core Strategy will be subject to further public consultation providing an opportunity for stakeholders to comment on the document and the proposals.

Core Strategy Statement of Consultation

Appendix D – Council Reports and Approval of the Preferred Option



Blackpool Core Strategy Executive Decisions

23rd February 2009
15th July 2009
10th March 2010

REPORT TO: EXECUTIVE
DECISION NUMBER: EX/17/2009
EARLIEST DATE FOR DECISION: 23rd February 2009

BLACKPOOL CORE STRATEGY ISSUES AND OPTIONS REPORT

Matter for Consideration:

The Core Strategy Issues and Options document was approved by Blackpool Council in June 2008, and subject to public consultation from mid July until the end of September 2008. The attached interim report sets out the key conclusions arising from the Issues and Options document and subsequent consultation, and seeks agreement of the preferred spatial option, as a basis for the ongoing preparation of the Blackpool Core Strategy.

Information:

The attached report at Appendix 3a sets out the key conclusions arising from consideration of responses to the Issues and Options consultation document and further assessment of the merits of each option. It seeks agreement for a broad preferred spatial option as a basis for the ongoing preparation of the new Blackpool Core Strategy.

The choices of the way forward for Blackpool are limited and the report concludes that the eventual preferred option should be based on a mix of three options - Inner Area Regeneration, Marton Moss, and the Wider M55 Hub Growth Point.

A presentation of the issues raised by the Core Strategy was made to the Core Strategy Working Group on 22nd January 2009. A further presentation focused on the lands on the Blackpool/ Fylde boundary was made to a Blackpool/Fylde Joint Member Working Group on the 29th January 2009. No resolutions or decisions were made at these meetings, but Members were made aware and generally were supportive of the conclusions in the context of the increased housing requirements and twin needs for regeneration and growth.

Subject to approval of the recommended Preferred Option by Executive, a more detailed draft of the Preferred Option Core Strategy will then be prepared for consideration by Executive in Spring 2009. This will also include the recommended way forward in respect of other key strategic policy choices raised in the Issues and Options document (e.g. the Central Station site, main holiday accommodation areas, and Blackpool and Fylde College site). The draft Core Strategy will form the basis for public consultation prior to finalising the Publication and Submission editions later in 2009.

Further Information:

The Core Strategy is the land use or spatial expression of the Council's wider Sustainable Community Strategy. It is where the key strategic decisions and choices will be made about Blackpool's future development, explaining how proposed levels of employment, housing growth, retail, resort and other development needs will be met in the next 15-20 years. The Blackpool Core Strategy Preferred Option will review and replace many of the key strategic policies set out in the existing adopted Blackpool Local Plan.

Copies of the earlier Issues and Options document remain available on the Council's web-site, a main focus of which was to set out and consult widely on six broad "spatial options" for Blackpool's future growth and development. These were:

- o Urban Concentration/ Intensification.
- o Inner Area Regeneration
- o Suburban Expansion
- o Marton Moss Urban Extension
- o Wider M55 Hub Growth Point
- o Market Driven Approach

The attached interim report informs Members of the outcome of the Issues and Options report and consultation, and seeks their support for a preferred broad spatial way forward for Blackpool's future development. The report assesses to what extent each of the broad spatial options will best deliver:

- 1) Fundamental change/ regeneration of the resort core and town centre.
- 2) A sufficient range of high quality homes and employment opportunities.
- 3) Optimal use of its built / natural environment, resources and facilities.
- 4) Long term strategic development of Blackpool & the Fylde Sub-Region.
- 5) Quality design and development.
- 6) Efficient management of transport and travel demand,
- 7) Efficient infrastructure and services provision.

and concludes with a market overview and summary assessment of the deliverability of each option.

This is informed by:

- o The responses to the Issues and Options document from key regional development bodies and other organisations, landowners and development interests.
- o The local public acceptability of the strategic development options.
- o The sustainability assessment of the alternative development options

The report highlights the strengths and weaknesses of each of the main options, and concludes that the eventual preferred option should be based on a mix of 3 options:

- Option 2 Inner Area Regeneration
- Option 4 Marton Moss
- Option 5 Wider M55 Hub Growth Point (including lands within Fylde)

Fundamentally, the Core Strategy must prioritise regeneration, and provide the impetus for Blackpool's wider economic development and housing growth. Regeneration of the inner resort, town centre, and residential core is essential if the Core Strategy is to help bring about the radical economic, social and physical change required - but new homes and jobs are also needed on the edge of Blackpool to create the market and development opportunities to meet the community's needs and deliver the wider Vision of a New Blackpool.

Does the information submitted include any exempt information? NO

Legal Considerations:

The Blackpool Core Strategy, when adopted by the Council, will be the key strategic document forming part of the Council's statutory Local Development Framework.

Personnel Considerations:

The Blackpool Core Strategy is being resourced by existing staff within the development Plans and Projects Division.

Financial Considerations:

Preparation and consultation on the Blackpool Core Strategy is accounted for in the Business Plan and budget for the Planning Department. It will be subject to independent examination by the Government that is likely to entail significant expenditure, primarily in 2010/2011. Costs and budgets for this expenditure will be identified in advance.

Performance Management Considerations:

The preparation of the Blackpool Core Strategy is a key component of the Council's Local Development Scheme

Risk Management Considerations:

The Core Strategy is the document which will provide the statutory planning framework to enable and assist delivery of Blackpool's increased housing and other future development requirements to meet its twin needs for regeneration and growth. Without its progress, acquisition, land assembly and planning approval for key regeneration and development projects will be substantially undermined and delayed. The potential need for cooperation and joint consideration of development needs on the Blackpool/ Fylde boundary will in future require increasing alignment with the Fylde Core Strategy process - delays in which could similarly undermine progress.

Relevant Officer:

Tim Brown, Chief Planning Officer

Relevant Cabinet Member:

Councillor M. Callow JP

Consultation Undertaken:

The Core Strategy Issues and Options document was approved by Blackpool Council in June 2008, and subject to wide public consultation from mid July until the end of September 2008.

Background Papers:

- [Blackpool Core Strategy Preferred Option Interim Report](#)

Is this a key decision?

YES

Forward Plan Ref. No:

09/2009

Is the decision required in less than 5 days?

NO

Recommendations:

That a mix of Options 2, 4, and 5 (Inner Area Regeneration, Marton Moss, and wider M55 Hub Growth Point) be approved as the Blackpool Core Strategy Preferred Option. That this Preferred Option be the basis for the draft Core Strategy to be prepared for consideration by Executive and for subsequent consultation. This document will set out the Council's draft strategic development plan and planning policies for the next 15-20 years.

Reasons for Recommendations:

To progress preparation of the statutory planning framework to support Blackpool's future regeneration and growth.

Is the recommendation contrary to a plan or strategy adopted or approved by the Council? NO

Is the recommendation in accordance with the Council's approved Budget? YES

Other alternative options to be considered:

The earlier Issues and Options Report fully set out a range of alternative strategic development options, which have been considered in detail.

Policy, Overview, and Scrutiny Committee Chairman (where appropriate)

Date Informed: 13th February 2009

Date Approved: N/A

DECLARATION(S) OF INTEREST (if applicable)

None

Decision:

The Executive agreed the recommendation as outlined above namely: 1. That a mix of Options 2, 4, and 5 (Inner Area Regeneration, Marton Moss, and wider M55 Hub Growth Point) be approved as the Blackpool Core Strategy Preferred Option. 2. That this Preferred Option be the basis for the draft Core Strategy to be prepared for consideration by Executive and for subsequent consultation. This document will set out the Council's draft strategic development plan and planning policies for the next 15-20 years.

Date: 23rd February 2009

Reason for Decision:

To progress preparation of the statutory planning framework to support Blackpool's future regeneration and growth.

Date of Publication: 24th February 2009

[[Printer-friendly version](#)]

BLACKPOOL CORE STRATEGY
PREFERRED OPTION: INTERIM REPORT

1 INTRODUCTION

The Core Strategy is the land use or spatial expression of the Council's wider Sustainable Community Strategy which seeks to create a framework for a more prosperous and healthier Blackpool. It is where the key strategic decisions and most difficult choices will be made about Blackpool's future development, explaining how proposed levels of employment, housing growth, retail, resort and other development needs will be met in the next 15-20 years.

An Issues and Options document was approved by Blackpool Council in June 2008, and was subject to extensive public consultation from mid July until the end of September. The next formal stage in the preparation of the Core Strategy is to determine the Preferred Option, setting out the vision and strategy for Blackpool's future development. The Core Strategy Preferred Option is expected to be published in mid 2009, and then submitted to the Secretary of State for approval in Autumn 2009.

The purpose of this interim report is to set out the key conclusions arising from the Issues and Options document and subsequent consultation – and thereby determine a clear way forward for the preparation of the Preferred Option/ Submission Edition of the new Blackpool Core Strategy.

The Issues and Options Document – June 2008

Copies of the earlier Issues and Options document remain available on the Council's web-site at

<http://www.blackpool.gov.uk/NR/ronlyres/D046EED4-B3FB-47CC-8ECB-0C49D2A20C5E/0/DraftDocMay08CoreStrategyAllSectionsprint.pdf>

The document set out:

- The planning context provided by the range of existing local and external strategies which will continue to influence Blackpool's future development.
- The detailed "evidence base" comprising various reports and studies which have been completed into different aspects of the current health and character of Blackpool (housing, employment, retail, flood risk, heritage, transport etc - details of these key documents also remain available to view on the Council's web-site).
- A Mini-Spatial profile of the town, identifying the key issues facing Blackpool.
- The Core Strategy Vision and Objectives to address these issues.

A main focus of the earlier Issues and Options document was to set out and consult widely on six broad “spatial options” for Blackpool’s future growth and development. These were:

Urban Concentration/ Intensification targets growth as far as possible to the existing urban area, and maximize opportunities to re-utilise vacant / underused land.

Inner Area Regeneration looks to target more growth to central Blackpool to assist the regeneration of the town centre and resort core and inner neighbourhoods.

Suburban Expansion looks to what extent there could be wider expansion beyond the existing urban area to develop remaining lands along its eastern boundary.

Marton Moss Urban Extension similarly looks to what extent the town can meet its expansion needs beyond its existing urban area, focusing growth on Marton Moss.

Wider M55 Hub Growth Point looks to what extent housing and employment needs could best be met by wider expansion around the M55 Hub on the edge of Blackpool.

Finally the **Market Driven Approach** informs wider consideration of all the options by assessing what would be likely to happen without a planning framework.

The purpose of this report is to help progress towards determining the most appropriate way forward for the development of Blackpool.

The published version of the Blackpool Core Strategy, expected in mid-2009, will set out in detail the preferred option for Blackpool’s future development, and the supporting strategic policies. In doing so, it will review and replace many of the key strategic policies set out in the existing adopted Blackpool Local Plan, including resort, housing; employment and transport policies.

This report does not address these wider policy issues – its focus, in advance of the published Core Strategy in 2009, is limited to considering the broad direction of Blackpool’s future growth and development.

Essentially, a decision needs to be taken about which of the options will best achieve the Vision for a new Blackpool and address the key issues identified in the Core Strategy Issues and Options document.

The wider 'Spatial Vision' of a New Blackpool to be delivered by the Core Strategy is:

"Blackpool will be the civic, cultural, retail and educational centre of the Fylde Coast, serving 350,000 local residents. It will be recognised as a unique, year-round 21st century visitor experience, offering escapism and fun with high quality attractions, and state of the art conferencing facilities, accommodation and hospitality.

The New Blackpool will attract higher value visitors, businesses and residents, creating the market and conditions for a wider and improved housing offer, and for higher value employment and growth. It will have a stable and growing population, offering a full range of educational provision, giving its people the skills and aspirations to succeed.

New homes and jobs will be provided in sustainable locations to meet the community's needs and support regeneration. Neighbourhoods will be enhanced in appearance with good access to shopping, health, recreation, open space and other facilities to meet community needs. Inner Blackpool will be transformed into a place offering a mix of aspirational and affordable housing within mixed, attractive neighbourhoods, with access to quality local services.

Higher quality developments will promote pride in the town and provide focus within a visually attractive, safe urban environment. An integrated transport system will provide safe, healthy and easy access across Blackpool. Areas of urban or natural quality throughout the New Blackpool will be conserved and enhanced".

The identified **Key issues** in the Issues and Options document were in summary:

Population and Housing: Address housing market imbalances and revive our inner areas, whilst providing a wider mix, including more affordable housing.

Employment: Diversify the economy by the provision of quality opportunities for new development to provide more and better paid jobs.

Resort: Sustain a more all year round visitor market and provide new high quality attractions and improved accommodation to revitalise the visitor economy.

Town Centre: Make the town centre more the heart of the Fylde Coast urban area, transforming its offer, environment and supporting facilities.

Built Environment: Address the poor quality of the urban environment, by improving the streetscape and making better places and spaces.

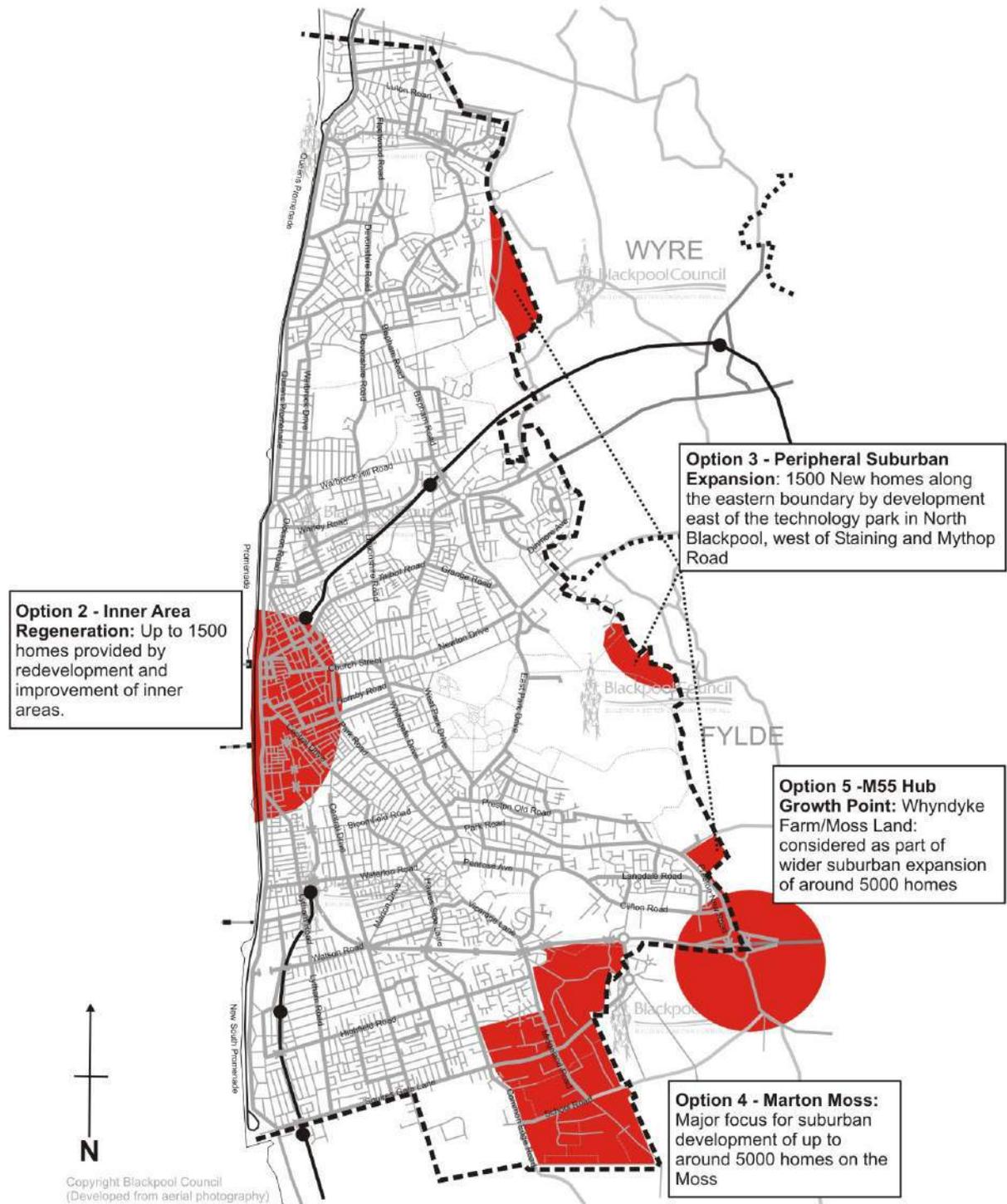
Community and Services: Develop sustainable, safe and healthy neighbourhoods with a diverse range of accessible facilities, and heighten residents' aspirations.

Natural Environment: Manage change so as to make the most of Blackpool's natural assets, balancing the requirement for new development with environmental interests, including the impact on climate change and our carbon footprint. .

Transport and Travel: Make a better connected Blackpool with easy access to jobs and local services and a more integrated pedestrian and transport network, with new developments well served by sustainable modes of transport.

An indicative illustration of the range of options for Blackpool's future development is set out below, with a detailed assessment of the implications of each option set out in the remainder of the report.

Option 1 - Urban Concentration seeks to maximise growth by promoting several hundred homes through development of remaining spaces and intensification of the development across the existing urban area



Residents are also asked whether there are any other options they wish to put forward to meet Blackpool's growth and development needs

2 SETTING THE SCENE: CHOICE OF ALTERNATIVE SPATIAL OPTIONS

The choice of the preferred way forward for Blackpool's broad spatial development and growth must continue to be made within the framework of a range of guidance set by wider Government national and regional planning policy.

Most specifically, the North West Regional Spatial Strategy (NWRSS) adopted on 30th September 2008 now forms a key overarching part of the statutory Local Development Framework for Blackpool. It sets out key policies and requirements which must be reflected in the Blackpool Core Strategy.

Other major influences on the direction of the Core Strategy at local level comprise:

- *The Blackpool Sustainable Community Strategy (SCS)*, prepared by the Local Strategic Partnership which coordinate the objectives of various community, voluntary and statutory organisations across Blackpool.
- *Blackpool's Local Area Agreement (LAA)*, which is the main delivery plan for the SCS, with the content of the LAA agreed between the Local Strategic Partnership and Government, and reviewed every 3 years.
- The ReBlackpool Urban Regeneration Company, which is harnessing public funding and much wider private sector investment to transform the resort.

The Issues and Options Consultation

The Council undertook an extensive programme of consultation with stakeholders and the wider community to inform the way forward from 18th July to 26th September 2008. The Issues and Options report was made available:

- On the Council's web-site
- At the main Council offices
- At all libraries in the Borough
- To statutory bodies, organisations and key interest groups.

Extensive publicity was given to the Issues and Options document in the local press, including a special feature in the Council's own newspaper "Your Blackpool" which was delivered to all households in the Borough during the consultation period. In addition, planning officers gave presentations to interested groups internally within the Council and to outside groups and organisations. Two Special Area Forums were held to focus on more specific local areas in both the north and south of the town.

Despite this, the overall response to consultation at the Issues and Options stage was limited, with around 80 total responses. Further consultation when firmer policies and proposals have been developed on specific issues will be undertaken in advance of progressing to the Publication/ Submission Edition of the Core Strategy. The consultation feedback documents to date, together with the summarised responses to the first stage of consultation will be made available at the main Council Offices and on-line.

The remainder of this report informs Members of the outcome of the Issues and Options report and consultation, and seeks their approval of a preferred broad spatial way forward for Blackpool's future development. This will then provide a basis for the officers subsequent detailed preparation of the next formal stage Preferred Option/ Publication/ Submission Edition of the Core Strategy.

Making the Choice

The Core Strategy as a whole needs to be considered against all the spatial objectives identified in the Issues and Options report and substantially mirror the identified priorities under the Goals of the Sustainable Community Strategy:

Goal 1 Improve prosperity for our population

Spatial Objectives:

- Ambitious and sustainable economic growth
- Provide an enhanced all year round tourism product
- Re-establish the town centre as a first choice destination
- Enhance employment quality and opportunities
- Improve transport integration and increase accessibility.
- Make best use of all land resources and buildings.

Goal 2 Develop a Safe clean and pleasant place

Spatial Objectives

- Address housing market imbalances and provide a wider mix of new homes
- Regenerate resort and residential neighbourhoods
- Promote balanced communities with ease of access to facilities and services.
- Lift quality in the built and natural environment
- Create a healthy, safe, clean, and “greener” Blackpool
- Tackle poverty, reduce social exclusion, and raise skills and attainment

However, the focus of this report is on initially determining the best broad strategy for the delivery of the required future key housing and supporting economic growth to meet Blackpool's future development needs.

Reflecting all the above, three key aspirations were identified in the Issues and Options report which embrace these objectives, and were seen as the driving forces for identifying the best option for Blackpool's future growth.

These are:

- 1) The need to provide the right land use framework for fundamental physical change to the inner resort, town centre and residential core which have been identified as a priority for regeneration.**
- 2) The need to ensure the provision of a sufficient range of both high quality homes and employment opportunities in sustainable locations to meet residents needs.**
- 3) The need to make the most of all the land resources and buildings that contribute to Blackpool as a place to live, work and visit – getting the most from its built and natural environment, its infrastructure and facilities.**

The choice between the various spatial options also needs to specifically consider 5 other factors:

4) The strategic implications on the longer term regeneration and development of Blackpool and the wider Fylde Sub-Region.

A sustainable future for Blackpool means also taking a longer term view and having a clear understanding of where the priorities lie. In the context of Blackpool's limited choices and the fact that development pressures will continue – the evolving strategy to 2025 must also have regard to the longer term need to manage and balance Blackpool's future development and growth, whilst maintaining and enhancing its townscape and natural assets.

The Blackpool Core Strategy also needs to be coordinated with the respective Fylde and Wyre Core Strategies. While Blackpool is the principal urban centre, there are major links and interdependencies between the three authorities, with shared employment, housing, transport issues and other interests across the Fylde Sub-Region, seeking to deliver regeneration and investment across a number of fronts.

5) The potential to deliver quality.

Raising all aspects of quality for the resident, visitors, and business environment is a vital aspect of Blackpool's regeneration. There is a fundamental need to deliver quality, both in the design and layout of new development, and by tackling the past legacy of environmental problems that detract from the enjoyment of Blackpool as a place to live and work.

6) The potential to efficiently manage transport and travel demand, and improve connectivity within Blackpool and the Fylde Sub-Region.

Economic vitality and the quality of life of residents are closely linked to the effectiveness of transport infrastructure. Planning transport effectively and promoting good accessibility by a range of transport modes, by focusing development in the most appropriate locations, will ensure a better integrated transport system both within Blackpool and across the Fylde Sub-Region.

7) The impact on wider infrastructure and services provision.

Balanced and healthy communities should provide for a full range of local shops, open space, education, health, leisure and supporting community facilities accessible to all. Future development needs to be undertaken in a way that makes the best use of existing infrastructure, maximising integration with the existing urban area. Equally, it must ensure that when new facilities and infrastructure are required – whether to overcome development constraints such as drainage or highways issues, or meet new local community needs – they must be provided in a way which best helps shape future neighbourhoods to deliver efficient community facility provision to support the social and economic fabric of new development areas.

8) A market overview and summary assessment of deliverability.

The assessment of each of the options concludes by drawing together the issues in terms of their implications for the overall deliverability of the options in the context of realities on the ground, policy issues, market attractiveness and the timescale of the Core Strategy to 2025.

Structure of the Remainder of the Report

The remainder of this report therefore considers to what extent each of the broad spatial options will best deliver these aspirations and how they will impact on the above issues. The assessment, which follows, has been informed by:

- *The specific responses to the Issues and Options document from key regional development bodies and other organizations*
- *The consultation responses from other key agencies, landowners and development interests*
- *The local public acceptability of the strategic development options.*
- *The sustainability assessment of the alternative development options*

Sustainability Appraisal

Councils are required to plan their areas in ways that contribute to the achievement of sustainable development – to meet the needs of the present without compromising the ability of future generations to meet their needs.

European and national planning legislation requires that an independent Sustainability Appraisal (SA) is undertaken of the Blackpool Core Strategy to consider the likely social, economic and environmental effects of the options, policies and proposals. It includes Strategic Environmental Assessment (SEA), which involves assessing the environmental effects of plans and programmes.

Hyder Consulting was commissioned by Blackpool Council to undertake a Sustainability Appraisal of the strategic options. The aim of SA is to inform the choice of options, reduce the negative impacts and increase the positive impacts of policy choices and different courses of action.

Their “*Sustainability Appraisal of the Core Strategy, Assessment of Strategic Options*” was completed in April 2008 and focused on the primary elements of each of the 6 spatial options. The full assessment is available to view on the Council’s planning website, and a summary of the key sustainability strengths and weaknesses was included alongside the description of the alternative spatial options in the Core Strategy Issues and Options Report.

The sustainability of the alternative development options is a critical element of determining the way forward and underlies much of the officers’ own consideration of the broad options, as well as being directly informed by the independent Sustainability Appraisal.

A further detailed Sustainability Appraisal will be undertaken in 2009 setting out the social, environmental and economic effects of the eventually determined Preferred Option.

3 ALTERNATIVE SPATIAL OPTIONS ASSESSMENT

As has been stated, Blackpool's broad spatial options compared to many areas, are very limited and, at the outset, it is recognised the eventual preferred option is likely to be a matter of finding the right balance and mix between the various alternatives – rather than a simple choice of one preferred option.

Public consultation also sought views on whether any other broad spatial options should be considered. However, with a comprehensive range of options put forward, there were no further suggested alternatives to meet Blackpool's needs.

In determining the long term strategic planning framework for Blackpool's future development, the most obvious direct demands are the housing and economic development requirements of the adopted NWRSS (North West Regional Spatial Strategy) as part of the national priority for housing and supporting employment growth. These requirements are set out and discussed in full in three documents – the Fylde Sub-Region Strategic Housing Market Assessment, the Blackpool Strategic Housing Land Availability Assessment and the Blackpool Employment Study.

Basically, the situation for housing is that the NWRSS requires 9,800 new homes in Blackpool (2003-2025). Allowing for houses already built, under construction or with planning permission at April 1st 2008, this leaves an outstanding net requirement for around 7,500 new dwellings. Around a third of this required development can be met from windfall developments within the existing urban area, leaving an outstanding requirement for around 5,000 dwellings (2008-2025). The total of 9,800 is a minimum requirement. Blackpool has also submitted a bid to Government for Growth Point status in partnership with the Central Lancashire authorities which could further increase this figure by around 500 dwellings

Equally, it is an essential part of an effective development strategy to make sure Blackpool has a good supply of employment land geared to meet the needs of the economy. The 2007 Blackpool Employment Land Review identified the potential need for around 40 hectares of new employment land, either within or on the edge of Blackpool to 2025.

Thus when considering the 6 strategic alternative spatial options for Blackpool's future development, two key requirements are to find sites for around 5,000 more homes and 40 hectares of employment land - together with all other supporting land uses, services, facilities, recreation opportunities needed for balanced and healthy local communities.

Having already taken account of the capacity within the existing urban area for new 'windfall developments', the higher housing and employment development requirements mean that some new development will inevitably now be required on the edge of Blackpool.

The challenge for the Core Strategy is to determine a balanced level of provision which meets development targets and enables the necessary associated infrastructure provision or improvements to take place in the most efficient way.

The rest of this report assesses each of the six broad spatial options against the eight considerations set out in Section 2.

SPATIAL OPTION 1 - URBAN CONCENTRATION

Objective

Urban concentration is about seeking to intensify and increase the density of development within the urban area, by actively promoting a range of opportunities. This option would much more actively promote and encourage development of underused areas of land and higher densities of development.

Rationale

Government Guidance through the sequential approach encourages a primary focus for new development on derelict, vacant, and neglected sites within the existing urban area – and this is a priority for Blackpool Council under **all** options.

Spatial Option 1 goes beyond this by pro-actively promoting a range of housing development opportunities, with a focus on underused sites in existing use, such as:

- *development of large garden areas*
- *redevelopment of larger detached properties*
- *redevelopment of underused open space*
- *redevelopment of underused land/ buildings on existing employment sites.*
- *redevelopment of existing factories/ businesses outside the main estates*

Sustainability Appraisal

Option 1 performs well against many of the SA objectives, most notably because it focuses development in urban areas that on the whole would benefit from some form of regeneration, and are already well served by transport infrastructure and essential services. Impacts are likely to be realised in the wider borough, e.g. in terms of crime and economic growth.

The option also focuses development on Brownfield and underused land. However, whilst there may be numerous benefits associated with this, the actual extent of benefits may be limited principally because the option is likely to result in only very small scale development spread thinly across the urban area. It may not therefore be possible to target this into areas most at need of regeneration. It is likely that the option would only contribute several hundred dwellings out of the 4000-5000 actually required.

A key weakness of Option 1 is the likelihood that areas of urban open space may be lost in order to accommodate new development, or at least requirements for the provision of public open space in new developments may need to be reduced. Although this is as yet undecided, this may also extend to the loss of some existing shopping facilities, tourist accommodation and small businesses all of which would be detrimental. The loss of open space could also generate adverse impacts upon biodiversity and townscape.

If the negative effects of reduced public open space can be overcome, the principle of some level of urban intensification on Brownfield sites should be taken forward in conjunction with other proposals.

SPATIAL OPTION 1 - URBAN CONCENTRATION

Blackpool Core Strategy
Issues & Options

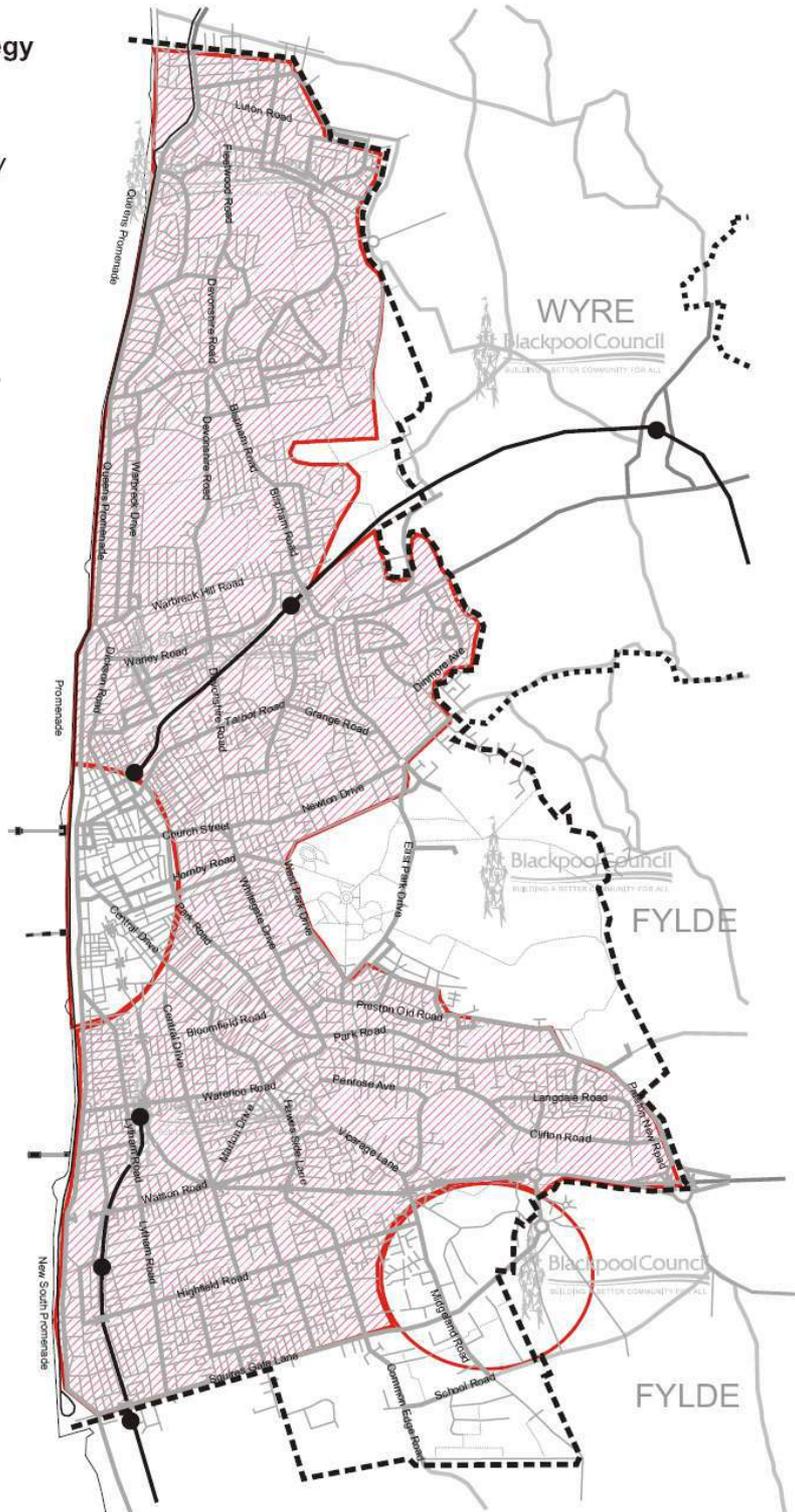
*Spatial Option 1
Urban Concentration /
Intensification*

Several hundred extra homes provided by intensification of development throughout the existing urban area.



Key

-  Focus of Development under Option 1
-  Supporting Development



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(Developed from aerial photography)

What the Community and Stakeholders told us

- General support for an approach to focus development within existing 'built up' areas before considering greenfield sites
- Concerns in the context of the already densely built up Blackpool urban area about potential losses of open space, garden areas, and detached dwellings for more housing - raising concerns of town-cramming.
- Other elements of this approach raised less concerns, with some support for higher densities of development on appropriate new sites, and for the redevelopment of employment uses in appropriate locations.

Option 1 Performance against Key Aspirations and Objectives

Fundamental change/ regeneration of resort and residential core.

- Neutral in impact

A range of high quality homes and employment in sustainable locations.

- This will potentially deliver only a few hundred additional dwellings. It will not create any additional employment opportunities, and might reduce them.

Make most of built and natural environment, infrastructure and facilities.

- Whilst focusing development within the existing urban area, the limited benefits of development brought forward could be undermined by their cumulative adverse impact on the remaining 'openness', of what is already an intensively built up environment. Surface water drainage is also more problematic within the existing urban area, with a need to retain permeable surfaces which reduce run-off.

Long term regeneration/ development of Blackpool & Fylde Sub-Region.

- The benefits of this option are focused on the short term, by maximising opportunities within the existing built up area. It would not significantly affect or support longer term development needs.

The potential to deliver quality.

- Higher density schemes can individually be as high quality as lower density schemes in built design terms. However, cumulatively a continuing erosion of remaining openness within the Blackpool urban area would have a negative impact on the urban environment.

Efficient transport and travel within Blackpool & Fylde Sub-Region.

- The dispersed distribution of a limited quantum of additional housing throughout the existing urban area will have no significant impact on transport and travel needs. The existing Blackpool urban area is generally readily accessible and well served by public transport.

The impact on wider infrastructure and services provision.

- New development under this option would be dispersed across the existing urban area. It would thus be well served by shops, schools, community facilities and supporting services, and in net terms make less demands on new infrastructure.

Market Overview and Deliverability.

Despite the current market downturn, higher value housing uses, where permitted, will continue to be an attractive option to landowners and developers. While some elements of the urban concentration option have received support, others raise concerns. The potential advantages of policies pro-actively promoting more intensification within the existing urban area, including specific new housing opportunity sites would need to be a very carefully balanced, and a policy of over-intensification would not be supported. This is likely to erode further the contribution that urban concentration could make to future required levels of development over the plan period, perhaps to only a few hundred, rather than several hundred dwellings.

SPATIAL OPTION 2 – INNER AREA REGENERATION

Objective

This option is about targeting much more growth to central Blackpool to provide for an enhanced residential offer in inner area communities, and to act as a wider economic driver to address problems of resort decline, particularly in the holiday accommodation sector.

Rationale

Significant steps have been taken towards achieving this via the town's evolving regeneration plans which have started to deliver wider changes on sites such as Talbot Gateway, Hounds Hill, the former Central Station site, Promenade headlands, and wider seafront.

This option seeks to identify the priorities for regeneration and to explore to what extent there is support over and above existing key sites for further major inner area redevelopment, and specifically for widening housing choice in the inner areas.

Sustainability Appraisal

Option 2 performs very strongly against many of the SA objectives, notably because it focuses development into the areas most at need of regeneration, in areas that could potentially spearhead wider regenerative efforts given its central location at the heart of the town, and also in areas that are well serviced by public transport and essential services. There is potential for cumulative benefits associated with wider regeneration proposals.

However, it is essential that growth in this area provides sufficient balance between residential growth and growth in the tourism industry. This is a central area of the Blackpool resort and could be a clear driver for regeneration of the tourist offer. It should also be noted that there are significant other regeneration proposals in and around this area which would assist both residential and commercial regeneration.

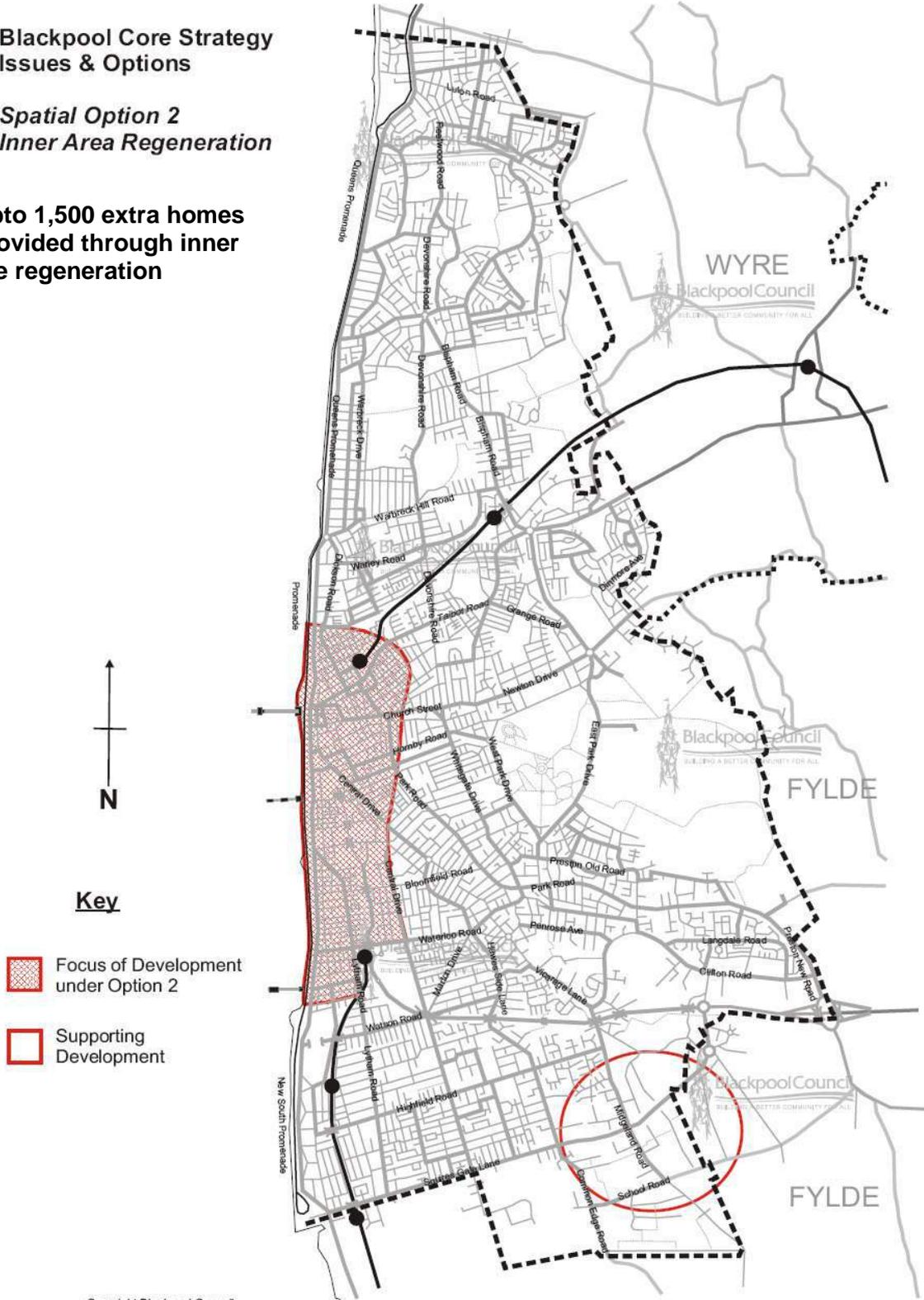
The principle of developing in the inner urban areas along with other regeneration schemes should be taken forward, although the balance between residential and tourist development must be retained. Further development outside these areas will also be required.

SPATIAL OPTION 2 – INNER AREA REGENERATION

Blackpool Core Strategy
Issues & Options

Spatial Option 2
Inner Area Regeneration

Upto 1,500 extra homes
provided through inner
are regeneration



Key

-  Focus of Development under Option 2
-  Supporting Development

What the Community and Stakeholders told us

- Support for this approach to assist resort, town centre and wider regeneration of Blackpool, both from the general public, regional bodies and other interests.
- Conversely, recognition from some, but generally more limited public awareness, of the huge resource implications which could impact on the deliverability of this option.
- A preferred focus for inner area regeneration on sites close to the seafront and town centre, and on key highway frontages to maximize their impact.

Option 2 Performance against Key Aspirations and Objectives

Fundamental change/ regeneration of resort and residential core.

- This option, to the extent it can be delivered, will most directly address these concerns.

A range of high quality homes and employment in sustainable locations.

- The level of new development which will be provided will be very dependent on what steps can be taken to assemble site development opportunities through a pro-active regeneration agenda. This will be dependent on both the scale of public funded intervention that can be made available, and how quickly changes delivered provide their own momentum for further private sector investment and development.

Make most of built and natural environment, infrastructure and facilities.

- Maximising the extent to which inner area regeneration can contribute to new housing development requirements will, if delivered in line with aspirations, have a major positive impact - both in terms of reducing the scale of development required to be met on greenfield sites, and uplifting the existing urban area. Surface water drainage is more problematic within the existing urban area, with the need to ensure redevelopments retain net permeable surfaces and do not add to surface water run-off.

Long term regeneration/ development of Blackpool & Fylde Sub-Region.

- The effective transformation of inner Blackpool into a place offering an increased and better mix of housing within attractive neighbourhoods is fundamental to the long term ambitions of the Core Strategy.

The potential to deliver quality.

- A key focus of this option is about providing a quality as well as a quantum uplift in the resort, town centre and residential offers. Larger scale quality new developments, with a variety of forms and densities, including taller buildings would help meet Blackpool's development needs, and enhance the environment of these areas through the creation of new landmarks and improved public realm and community spaces. Redevelopment would assist both resort and community

regeneration, improving the tenure and choice of housing and upgrading the resort accommodation offer.

Efficient transport and travel within Blackpool & Fylde Sub-Region.

- In location terms, inner area regeneration represents an effective way forward in helping to conveniently meet development needs with ready access to most facilities and services reducing dependence on car travel. Improvement of the pedestrian network is an integral part of inner area regeneration to ensure convenient, safe and pleasant access is provided and make walking more preferable for most short journeys. Other facilities, such as open space and, to some extent, schools, are less conveniently provided – but central locations are generally well connected by local public transport to facilities across the town, and for longer distance travel by rail and bus.

Impact on wider infrastructure and services provision.

- New development under this option would be concentrated within the existing inner urban area. It would thus be well served by shops, community facilities and supporting services, and in net terms make less demands on new infrastructure.

Market Overview and Deliverability.

This option would require both major public and private sector investment. This could only be successful if backed up by concerted wider action to provide new investment in leisure, shopping, seafront, and other town centre and resort infrastructure.

The wide recognition that now exists of Blackpool's need for regeneration, the creation and ongoing success of the ReBlackpool URC in harnessing investment, and the concentration of private sector re-investment in the future of central Blackpool, are all factors that support the deliverability of this option.

Blackpool's regeneration is gaining impetus, but future investment opportunities will need to be identified and delivered before it can more effectively provide its own momentum for change. Inner area regeneration is considered a critical and essential element to the whole delivery of the Blackpool Core Strategy.

SPATIAL OPTION 3 – PERIPHERAL SUBURBAN EXPANSION

Objective

This option seeks to assess to what extent further greenfield locations should be promoted on remaining lands on the eastern edge of the Blackpool urban area.

Rationale

Blackpool's past growth and development has been based on providing a mix of housing and supporting development opportunities. With the established requirement for substantially increased housing, wider suburban expansion would provide a better range of sites to meet development choices on the edge of Blackpool.

Sustainability Appraisal

This option would generate benefits associated with developing residential land closer to potential sources of employment in eastern Blackpool. The option also includes for some growth in the inner regeneration areas which could lead to some of the positive effects identified in Option 2 above although not as strongly.

The key concerns with this option relate to a less well developed transport infrastructure in the east and the cumulative loss of a number of small areas of urban fringe open space, which may also lead to an encroachment on Green Belt and possible settlement coalescence.

A number of environmental SA objectives could be adversely affected by this option, the main issues being landscape, biodiversity and potential flood risk.

Potentially, 1,500 dwellings could be provided through this option, with the remainder provided within inner areas and on Marton Moss. It could also be considered that with the exception of Marton Moss, these small extensions may not have the critical mass to support a sustainable community and may in fact result in increased pressure on existing local services.

It is not recommended that this option is carried forward into the preferred strategy.

SPATIAL OPTION 3 – PERIPHERAL SUBURBAN EXPANSION

**Blackpool Core Strategy
Issues & Options**

*Spatial Option 3
Suburban Expansion*

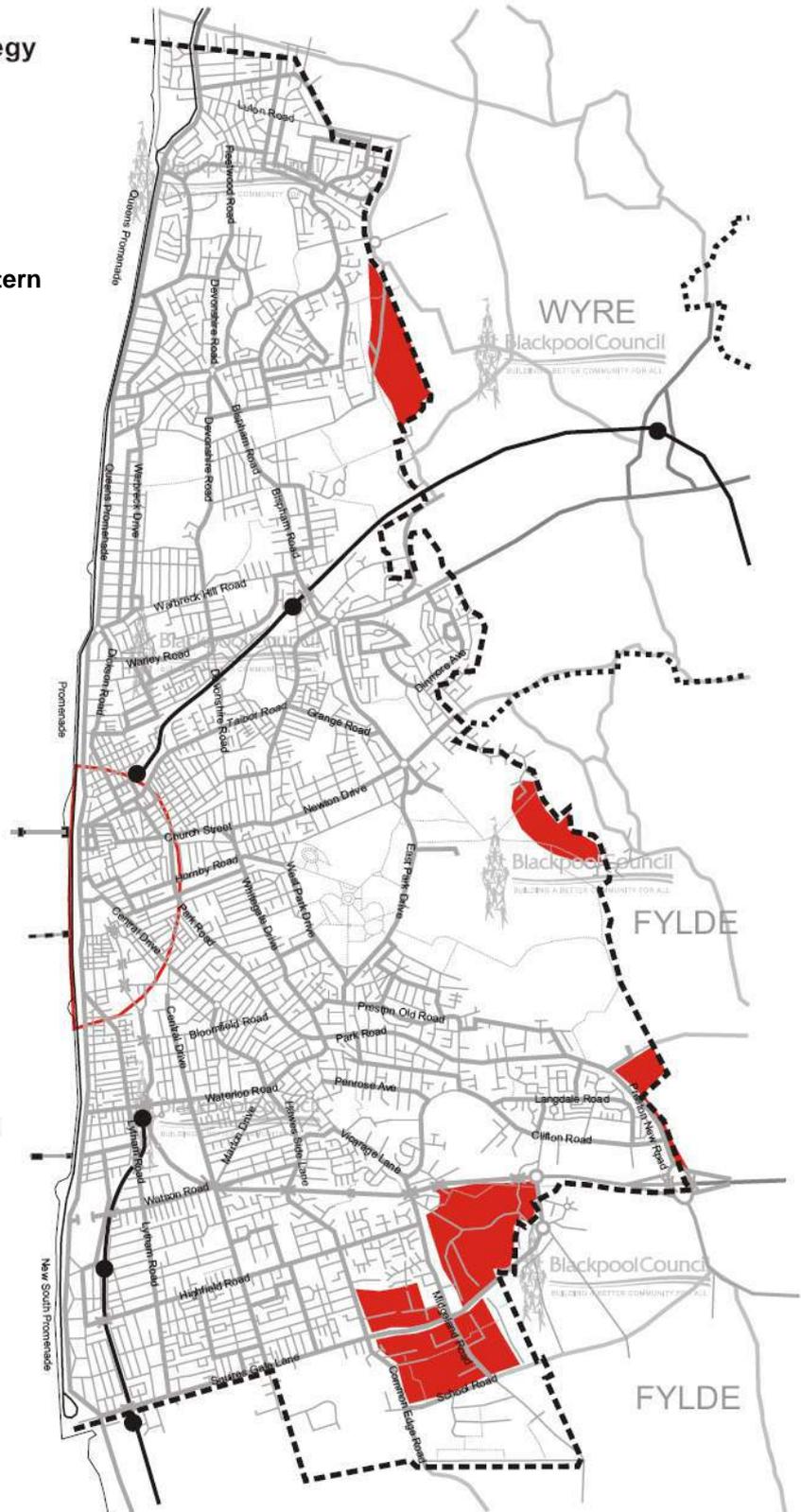
**1500 new homes along the eastern
boundary - in NE Blackpool,
W of Staining, & Mythop Rd**

**(plus substantial development
on Marton Moss)**



Key

- Focus of Development under Option 3
- Supporting Development



What the Community and Stakeholders told us

- There was only limited public response expressed at this stage – with those who did respond on this issue generally not supportive of peripheral development on the eastern edge of Blackpool.
- The neighbouring local authority is opposed to the development of lands within the currently designated green belt between Blackpool and Carleton.
- The neighbouring parish council is opposed to the development of lands between Blackpool and Staining.
- Local concerns were raised about ground conditions and drainage issues on the lands at Mythop Road, but there is landowner, developer, and some public support for the development of these lands.
- Concerns were expressed from environmental interest groups about the impact of greenfield development on the natural environment.
- Generally, the response from regional bodies and organisations was that this option, in line with the sustainability appraisal, should have little role to play.

Option 3 Performance against Key Aspirations and Objectives

Fundamental change/ regeneration of resort and residential core.

- Peripheral development would not directly support inner area regeneration, and could undermine its delivery unless carefully planned as part of a phased and coordinated development strategy.

A range of high quality homes and employment in sustainable locations.

- Past suburban expansion has been an integral element of maintaining a stable Blackpool resident population and supporting its local economy. A wider range of housing sites will add to the attractiveness of the Blackpool housing offer. However, there is little scope for employment expansion on these sites, both in terms of size and market attractiveness.

Make most of built and natural environment, infrastructure and facilities.

- These peripheral sites could be reasonably integrated with the existing urban area, but are generally less close to local services and facilities. Development in north east Blackpool would erode the Green Belt. Similarly, development of lands west of Staining would only be a realistic option if closely integrated with adjoining Green Belt lands in Fylde. Lands at Mythop Road are not part of the statutory Green Belt, but remain part of a wider expanse of lands currently allocated as countryside area on adjoining lands in Fylde, and logically their future should be determined in conjunction with these lands.

Long term regeneration/ development of Blackpool & Fylde Sub-Region.

- The long term development potential of lands between Blackpool and Carleton and Blackpool and Staining are constrained by the currently designated Green Belt on adjoining lands in Wyre and Fylde. The need to prevent the coalescence of settlements would remain an important long term objective.

The potential to deliver quality.

- The identified broad locations could provide for a range of homes in a high quality residential environment. However, they would be relatively localized and fragmented improvements, with limited scope for delivering a wider quality of place with a range of integrated facilities.

Efficient transport and travel within Blackpool & Fylde Sub-Region.

- No major new highways infrastructure would be expected to be required for development of these peripheral lands. The sites in north east Blackpool, close to Staining, and off Mythop Road all can be accessed from the existing main highway network. There is a less well developed and convenient public transport accessibility to lands on the eastern edge of Blackpool, than more central locations. There is potential for the integration of walking and cycling with adjoining areas, but public transport connectivity and viability and the wider integration of development and transport is more difficult to deliver from dispersed peripheral sites, as against more comprehensive development locations.

Impact on wider infrastructure and services provision.

- Although not major, the peripheral levels of development proposed under this option would still represent a substantial expansion and could place significant demands on nearby schools, services and facilities. These peripheral locations are also less well served by shops and local community facilities in their immediate vicinity.

Market Overview and Deliverability

Putting aside wider constraints and other considerations, in market terms a wider mix of suburban residential development sites would be attractive to developers. The concentration of peripheral sites in a limited number of ownerships would potentially also assist bringing forward lands for development. However, the realities are the Green Belts between Blackpool and Carleton and Blackpool and Staining are a major policy constraint on the potential development of lands in north east Blackpool and west of Staining. Whether there is any more limited potential for a 'rounding off' of development on lands west of Staining within Blackpool will need to be considered, with the local parish council opposed to any significant expansion.

There is no Green Belt constraint on the lands at Mythop Road within Blackpool, but peripheral expansion on this site still raises a range of countryside, landscape and drainage issues. The development of lands within Blackpool would be much better addressed as part of a more comprehensive assessment of development opportunities on the wider adjoining lands in Fylde. A peripheral development of the lands in Blackpool alone would not relate well to the adjoining open lands and also would be less likely to have the critical mass to support effective wider community provision in this location.

SPATIAL OPTION 4 – MARTON MOSS URBAN EXTENSION

Objective

This option seeks to assess to what extent there is potential for a sustainable urban extension to Blackpool, through a concentration of major new development, focused on Marton Moss.

Rationale

This option recognizes that Blackpool's past growth and development needs have in the past been based on a mix of development and improvements within the urban area, alongside a significant level of suburban expansion. Marton Moss is the one remaining concentration of largely undeveloped land in Blackpool, and this option considers the potential for a comprehensive development focus in this location. The nature and character of the lands supports a substantive rather than piecemeal approach. Comprehensive development would enable the more effective provision of supporting infrastructure, services and facilities.

Sustainability Appraisal

Option 4 consists of a major new suburban expansion at Marton Moss. This option has only limited provision for supporting development in the inner urban regeneration areas so the benefits realised there would be smaller. There are few significant environmental constraints to development in this area and whilst 'greener' areas would be lost, they do not represent the same character and quality of the more rural locations identified in option 3.

This option could potentially provide 5000 dwellings. There are however uncertainties as to whether it could create a truly sustainable community. It has sufficient critical mass to become more self-sufficient and sustainable transport proposals have been suggested. However, the layout and former uses for the site suggest that employment provision could be limited which is a significant weakness. It is expected that supporting shops, community facilities and services would be provided and a range of housing to meet local needs would also be inherent.

This option would perform significantly better against the SA objectives if there was a strong commitment to it being developed and designed as a sustainable community following principles associated with the Growth Point proposal in Option 5 and also the Best Practice in Urban Extensions and New Settlements guidance from the Department of Communities and Local Government (DCLG).

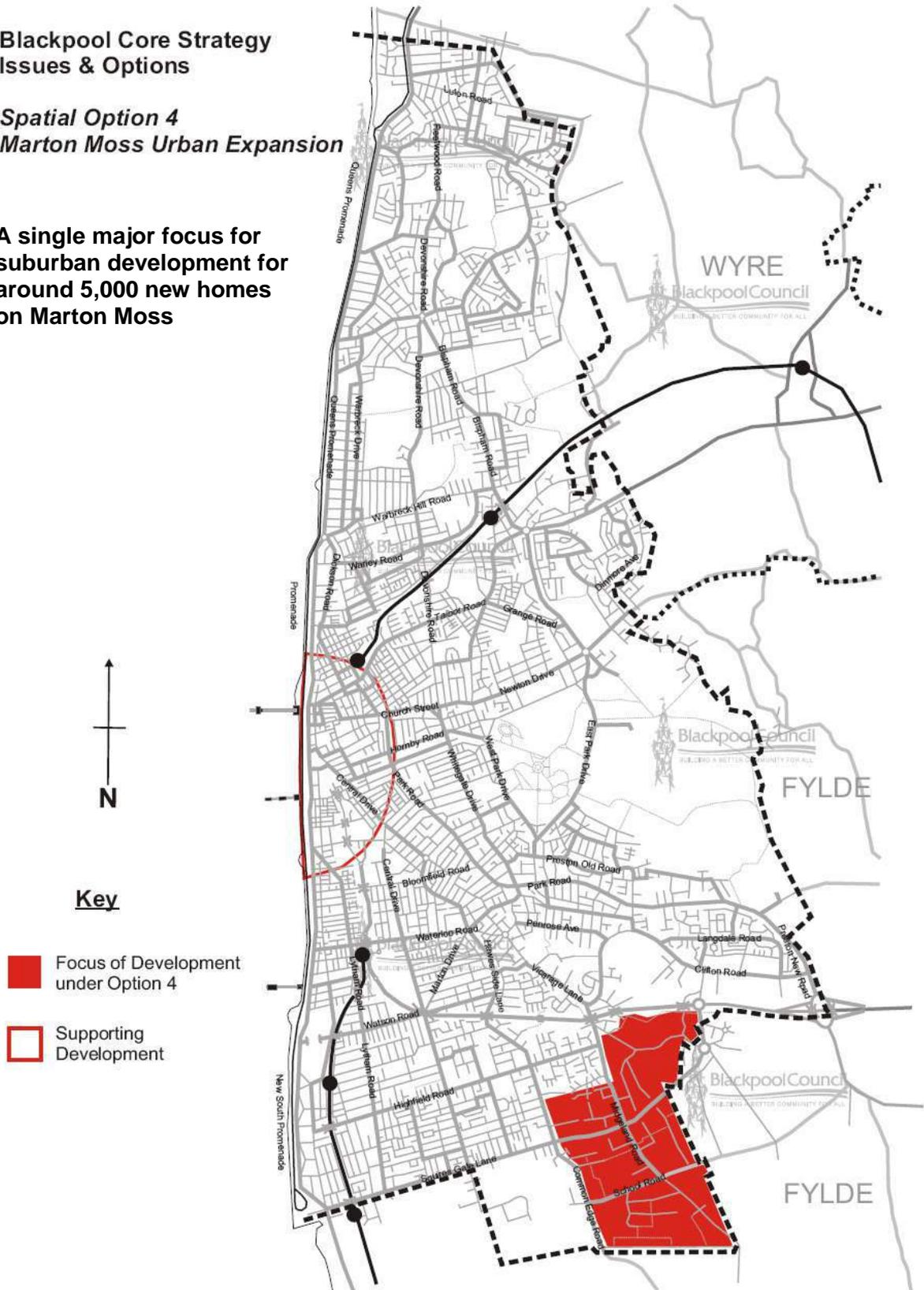
Without such a commitment, it is considered that this option should not be taken forward, as it would not be in the best interests of delivering a sustainable Blackpool.

SPATIAL OPTION 4 – MARTON MOSS URBAN EXTENSION

Blackpool Core Strategy
Issues & Options

Spatial Option 4
Marton Moss Urban Expansion

A single major focus for suburban development for around 5,000 new homes on Marton Moss



Key

- Focus of Development under Option 4
- Supporting Development

What the Community and Stakeholders told us

- There is opposition from many residents to development on the Moss because of nature conservation, amenity, and greenfield/ countryside area development issues.
- The response from other residents, land owners and house-builders is supportive of development on some parts of the Moss.
- Drainage issues are an important consideration. Utility providers recognise the better potential for surface water drainage as part of a wider greenfield development strategy, but there would be a need to increase capacity to deal with foul and surface water drainage to serve development needs.
- Generally, regional bodies and organisations recognise that some elements of this option could be taken forward - subject to concerns about infrastructure, and to determining a suitable mix and critical mass of different uses to provide a sustainable community at Marton Moss.

Option 4 Performance against Key Aspirations and Objectives

Fundamental change/ regeneration of resort and residential core.

- Unless properly coordinated as part of a phased development strategy development on Marton Moss could undermine regeneration by providing easier and more attractive greenfield development opportunities on the edge of Blackpool, diverting developers interest away from tackling, or creating more difficult and costly redevelopment sites in the inner area. A major focus for development on Marton Moss would need to be carefully planned to be readily integrated with the existing urban area and supportive of wider regeneration.

A range of high quality homes and employment in sustainable locations.

- The scale of lands available on the Moss has the potential to deliver a wide mix of quality homes, as part of a balanced residential community with supporting services and facilities. However, the concentrated form of existing development on the Moss, different from typical countryside areas, limits the opportunities for wider provision of employment, playing fields and those other uses which generally require large contiguous open areas of land or cleared sites. The relative lack of such sites undermines the potential of the Moss to create a fully sustainable community to meet a range of wider needs and support economic growth - as against the provision of a suburban residential extension.

Make most of built and natural environment, infrastructure and facilities.

- The development of most or the whole of the lands on the Moss would represent a major concentration of development in one area. This land is not part of the statutory green belt (currently being allocated as countryside area) and not subject to any other specific landscape protection. Comprehensive development would enable the more effective provision of supporting services and facilities, with well connected and accessible housing linked by a sustainable transport

and open space network. Development would lead to the displacement of existing urban fringe uses such as horse stabling, recreation uses, and remaining smallholdings, for which there is a need on the edge of most urban areas. The range of existing uses would also reduce the density and quantum of new housing that could be developed on the Moss, compared with more typical areas of open countryside.

Long term regeneration/ development of Blackpool & Fylde Sub-Region.

- The scale of lands on the Moss – in excess of 200 hectares - could provide the potential for a substantial long term development focus for a new suburban extension on the south eastern edge of the existing Blackpool urban area. The limitations of the particular character of the Moss, however, would not readily support the provision of new jobs, as well as homes, as part of a wider strategy to meet long term growth needs. How any substantial level of development could be coordinated to help drive forward inner area regeneration, rather than compete against it, would need to be a crucial component of any long term development strategy.

The potential to deliver quality.

- The character and scale of the Moss is such that it could provide for a range of homes in a residential environment. The substantial amount of longstanding development on the Moss would make it important for any new development to be sensitively designed to respect and enhance its existing character. The potential for large scale development would, however, provide opportunities for a wide mix of housing with locally distinctive designs appropriate to the surrounding built form and character of the Moss. Comprehensive rather than piecemeal development would also assist the incorporation of appropriate landscaping, energy and resource conservation within any development.

Efficient transport and travel within Blackpool & Fylde Sub-Region.

- Development of and access to new potential sites on the Moss would be assisted by the major link that already exists across the middle of the Moss via Progress Way. There would be potential as part of a comprehensive development to promote walking, cycling and improve transport provision as part of any comprehensive approach to development.

Impact on wider infrastructure and services provision.

- A larger development focus on the Moss will decrease the cost, and increase the viability of effective services and infrastructure provision in this location. Comprehensive development would enable the provision of necessary new on-site drainage infrastructure, and utility providers recognize the current lack of adequate capacity of existing off-site public sewers available to deal with foul and surface water drainage needs to be addressed with ongoing major new investment. Detailed further assessments would be required of planned levels and locations of new development. Substantial housing growth in this location would also need to be backed up by investment and provision of a range of supporting shops, community facilities and services.

Market Overview and Deliverability

There is clear evidence of housing market developer interest in these lands, the future of which has previously been a key development issue at the last two reviews of the development plan for Blackpool. An outstanding outline planning application is currently undetermined for a substantial area of lands north of Progress Way. Other house-builders have expressed support for development, a number of whom it is understood have some degree of interest in areas of land on the Moss between Progress Way and Yeadon Way.

However, there remain major issues raised by the potential development of lands on the Moss. There are concerns and opposition to development from some residents and environmental groups, balanced by a growing recognition from others of its development potential.

The lack of adequate drainage capacity and the fragmented nature of existing development in the area mean that further development on the Moss would only be possible through a comprehensive and coordinated approach for the release of major areas of land. Comprehensive development would enable the provision of necessary new on-site drainage infrastructure. The lack of adequate capacity of existing off-site public sewers available to deal with foul and surface water drainage also requires major new investment, with ongoing major investment and review dependent on long term planned levels and locations of new development.

There is no general public perception or acceptance of the potential for a major focus for development on the Moss to deliver much of Blackpool's future housing. House-builders have themselves raised the issue that such a single focus is unrealistic. Past building rates in Blackpool would also not support a comprehensive development strategy for much of the Moss within the timescale of the Core Strategy to 2025.

There is also recognition that the existing pattern of uses on the Moss still performs an important role. Comprehensive development would be likely to result in their displacement rather than removal, questioning the effectiveness of such an approach, as against planning for a wider mix of development within and on the edge of Blackpool. The characteristics of the lands on the Moss would also mean its comprehensive development would make it difficult to accommodate wider employment land and other development requirements as part of a properly coordinated focus for growth.

SPATIAL OPTION 5 – WIDER M55 HUB GROWTH POINT

Objective

This option, like Option 4 (Marton Moss) seeks to assess to what extent there is potential for a sustainable urban extension on the edge of Blackpool, but in recognition of Blackpool's tight knit boundary and limited supply of land, it also considers wider potential development choices on adjoining lands in Fylde Borough.

Blackpool Council is liaising with Fylde Council in seeking a coordinated approach in their respective Core Strategies to the consideration of strategic development options on lands on the Blackpool/ Fylde boundary. The Fylde Council Core Strategy Issues and Options Report will be published in 2009.

Rationale

Substantial lands have already been developed around the M55 junction in recent years on lands in Fylde close to the Blackpool boundary – mainly for employment uses – including the Blackpool Fylde Estate, the large ITSA office complex, the B&Q store, and the expanding Whitehills Park. There have previously also been proposals for a range of commercial/ retail/ leisure uses on these lands.

Option 5 raises the issue as to what extent these lands in conjunction with lands in Blackpool could be developed for a potentially wider mix of uses as well as further meeting employment needs. Blackpool and Fylde are effectively part of one functional housing and employment market area, with the need to integrate development, transport and investment in a way which best supports sustainable patterns of development on both sides of the boundary.

Sustainability Appraisal

Option 5, as with options 3 and 4, has only limited provision for supporting development in the inner urban regeneration areas, so the benefits realised there would be smaller. It would also be situated on primarily greenfield land with associated landscape and environmental disadvantages and would mark a significant focus of development away from the existing urban area. This could be perceived in the long-term as a precursor to further urban infill between this and the existing urban areas in the south east of Blackpool. Although the site is greenfield, there are no significant environmental designations and it could be considered that the landscape value has already been degraded by the presence of the M55 and existing development. Whilst the efficient motorway access is beneficial it may also result in higher car dependence and vehicle movements.

The main strengths with this option relate to the commitments through growth point development, aiming to create sustainable communities with all the environmental enhancements and mitigation measures that are inherent with this. There would be close proximity between jobs and homes, the easy access to the M55 would be very positive in terms of employment land investment potential and the development would meet a wide range of housing needs not just for Blackpool but also Fylde.

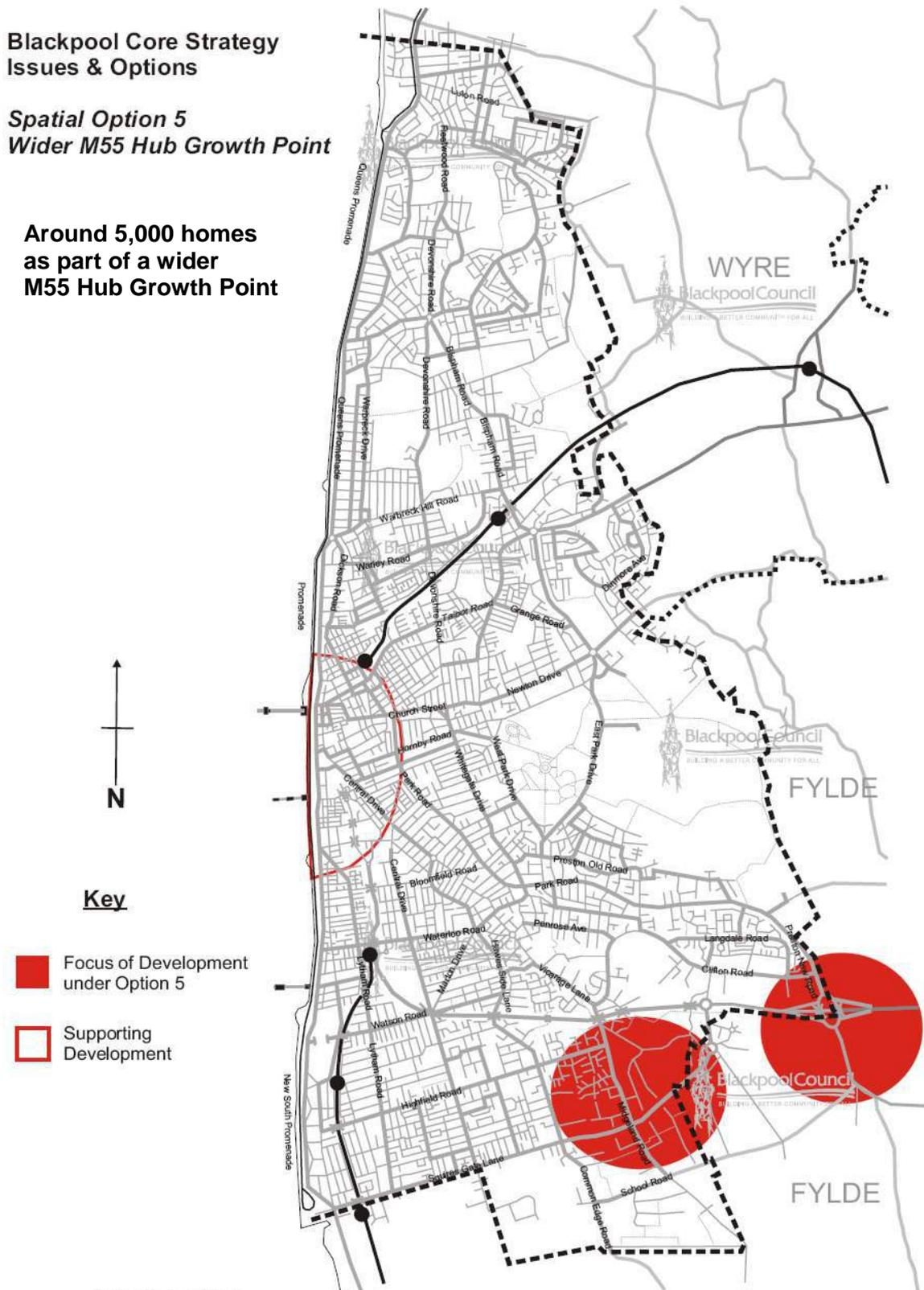
If all the elements of a sustainable community are encouraged, this option should be taken forward in conjunction with other recommended proposals, as a supporting development.

SPATIAL OPTION 5 – WIDER M55 HUB GROWTH POINT

Blackpool Core Strategy
Issues & Options

Spatial Option 5
Wider M55 Hub Growth Point

**Around 5,000 homes
as part of a wider
M55 Hub Growth Point**



What the Community and Stakeholders told us

- Limited general public response to this option, which is focused on large areas of land on the edge of Blackpool, rather than on existing communities.
- Support from land interests, as part of a wider development focus.
- Views expressed that a wider focus would be more deliverable, reducing reliance on Marton Moss to provide such high housing numbers.
- Concern that any such focus should be part of a coordinated approach in conjunction with, not at the expense of, regeneration.
- Concerns about the impact of greenfield development from environmental interests.
- Fylde Council did not express support or otherwise at this stage in advance of their own Core Strategy Issues and Options consultation.

Option 5 Performance against Key Aspirations and Objectives

Fundamental change/ regeneration of resort and residential core.

- Similar to Option 4 (Marton Moss), a wider focus for development on the M55 Hub would also fundamentally need to be complementary to regeneration of the inner core. Unless properly coordinated as part of a phased development strategy, it could undermine regeneration by providing easier and more attractive greenfield development opportunities on the edge of Blackpool, diverting developers interest away from creating opportunities or tackling more difficult and costly redevelopment sites in the inner area.

A range of high quality homes and employment in sustainable locations.

- The scale of lands available around the M55 Hub has the potential to deliver a wide mix of quality homes, including affordable housing, as part of a balanced residential community with supporting services and facilities. It is also of sufficient scale to build on the strengths of its existing employment focus and become a prime location for long term job growth to expand and diversify the sub-regional economy. The M55 itself, however, represent a major physical barrier to unifying development in a sustainable urban extension on the edge of Blackpool, rather than as a number of separate neighbourhoods. Any major development strategy would need to carefully evaluate how development could be effectively integrated – both to the existing urban edge, and to support the regeneration of inner Blackpool.

Make most of built and natural environment, infrastructure and facilities.

- The M55 Hub provides a greater quantity and choice of development sites compared to other suburban development options. Properly planned, this increases the potential to optimise resource management, by focusing development in the most appropriate locations. Comprehensive development would enable the more effective provision of supporting services and facilities, with well connected and accessible housing linked by a sustainable transport

and open space network. None of the lands are part of the statutory green belt, with most of the undeveloped lands not subject to any other specific landscape protection. Lands immediately to the north comprise the Marton Mere SSSI (Site of Scientific Interest) and Local Nature Reserve and any development would need to ensure it would not adversely affect its wildlife and conservation importance. To the east in Fylde there are attractive but narrow woodland belts of environmental value which are also important features of the landscape.

Long term regeneration/ development of Blackpool & Fylde Sub-Region.

- The lands around the M55 Hub, including Marton Moss, Whyndyke Farm, Whitehills, and wider lands straddling the two local authority areas – have the capacity to meet needs to 2025, with potential for sustainable longer term growth. Centrally located within the Sub-Region, and with excellent accessibility eastwards, the M55 Hub is an attractive location for potential business led expansion as well as wider housing growth. Its ready integration with the existing urban area would be essential to its delivery as a truly sustainable urban extension to Blackpool. Measures to improve connectivity north and south from the Hub to Fylde and Wyre would be equally critical to create a strategically significant long term development focus for wider sub-regional growth.

The potential to deliver quality.

- The range of sites is such that it has the potential to provide for a high quality, attractive and safe environment which offers good housing, matching job opportunities with the full range of supporting services and facilities. Comprehensive future development would also assist the incorporation of appropriate landscaping, energy and resource conservation technology. In these terms it could become an impressive new gateway to Blackpool, but the motorway and adjoining strategic highway corridors also represent a major physical barrier and could have a negative impact in truncating rather than unifying the lands around the Hub. Its development and growth is therefore more likely to be as a number of distinct high quality neighbourhoods. Connectivity, accessibility, and landmark buildings and uses would be important considerations in seeking to unify the Hub as a distinctive and quality location as a whole. The substantial amount of existing development would make it important for future growth to be sensitively undertaken to enhance its character.

Efficient transport and travel within Blackpool & Fylde Sub-Region.

- The major links that already converge on the Hub, comprising the M55, Yeadon Way and Progress Way, mean the location in these terms is already highly accessible, with the priority to improve connectivity north and south from the Hub, and with the existing Blackpool urban area. Improved public transport and more sustainable travel would be crucial components of providing a safe, convenient, and integrated development of the M55 Hub. There would be potential as part of a major development to promote walking, cycling and public transport. Major new development will in the short term be expected to secure the completion of the M55 – Heyhouses Link to Lytham St Annes and would also in the longer term increase the potential for improved links from the M55 northwards.

Impact on wider infrastructure and services provision.

A larger development focus around the M55 Hub will potentially decrease the cost, and increase the viability of effective services and infrastructure provision in this broad location. It would be essential to take a longer term view in determining the best way forward for the provision of supporting services and the proper planning of the area. Comprehensive development would enable the provision of necessary new drainage infrastructure, with the lack of adequate capacity of existing off-site public sewers available to deal with foul and surface water drainage, as for Option 4, a major issue. The existing concentration of employment uses on both sides of the boundary and the existing retail focus around Tesco's would need to be backed up by major new investment in a range of other supporting community facilities and services.

Market Overview and Deliverability

A focus for growth around the M55 junction, yet just 2 miles from Blackpool town centre, represents an attractive and marketable location for major new development. There is already clear evidence of developer interest in these lands – both in terms of the ongoing expansion of employment development on the Whitehills Business Park, and landowner and house-builder interest on Marton Moss and wider lands in Fylde.

While there is also some opposition to development, the evidence to date is that the public acceptability of potential development on the wider lands around the M55 Hub raises substantially less concerns than a single major focus for development on Marton Moss.

The potential of the M55 Hub for a wider mix of uses, its increased range of available sites and its gateway location, combine to provide a realistically deliverable and more comprehensive focus for development and long term growth. House-builders views and past building rates both support a wider focus of development, rather than a more singular focus on Marton Moss within the timescale of the Core Strategy to 2025.

Comprehensive development would enable the more efficient provision of necessary new drainage infrastructure, together with a range of supporting shops, community facilities and services. The lack of adequate capacity of existing off-site public sewers available to deal with foul and surface water drainage remains a major issue.

A wider development focus on the M55 Hub would also safeguard to some extent some of the wider range of recreational, horse stabling and other urban fringe uses which still perform an important role on the Moss.

Fylde Council's position and eventual strategic development choice of its preferred option will clearly have major implications for the future delivery of this option.

SPATIAL OPTION 6 – MARKET DRIVEN APPROACH

Objective

This considers what would be likely to happen without a focused strategy for development set out within the Core Strategy – effectively leaving it to the market to determine when and where development should best take place. This option does not provide a clear way forward.

Rationale

Where a Local Planning Authority fails to provide for an identified supply of land to meet its needs, then there will be a much increased likelihood that permission will be granted on 'market' sites identified and brought forward for development. Developers would logically focus on the easier and more readily developed opportunities, and seek to avoid more costly and difficult to develop sites.

A market driven approach is not realistically put forward as a serious option for development, but assessment of its implications usefully informs consideration of the options as a whole

Sustainability Appraisal

The key concern with this option is the lack of certainty that a market driven approach would bring. It is possible that many of the projects identified in options 1-5 together with their identified benefits and disbenefits could still be brought forward under this option, or indeed they may not. This uncertainty leads to an inability to plan strategically in a way that would enable benefits to be maximised and adverse impacts controlled and reduced.

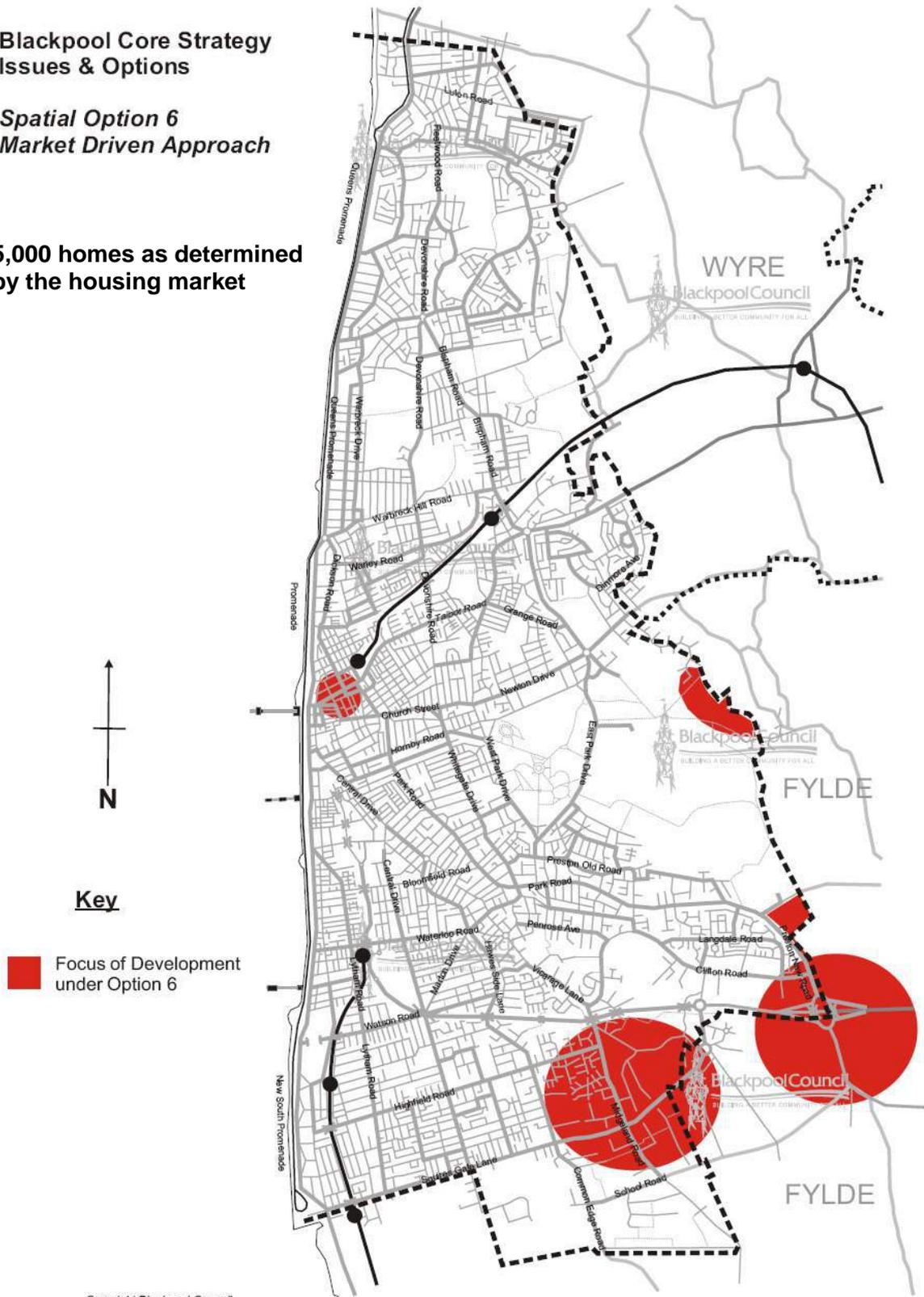
It is not considered that such an uncoordinated approach to development would be in the best interests of delivering a sustainable Blackpool.

SPATIAL OPTION 6 – MARKET DRIVEN APPROACH

Blackpool Core Strategy
Issues & Options

*Spatial Option 6
Market Driven Approach*

5,000 homes as determined
by the housing market



Key

■ Focus of Development under Option 6

What the Community and Stakeholders told us

- There was very limited general public response to this option, which was not supported.
- Regional bodies and other organisations did not consider this option has any role to play. It was generally considered it would not provide the required coordinated and comprehensive approach to development essential to the proper planning of the area.

Option 6 Performance against Key Aspirations and Objectives

Fundamental change/ regeneration of resort and residential core.

The focus would be expected to be on easier to develop greenfield sites, and away from the more complex regeneration opportunities in the inner areas of Blackpool. It would fail to create any framework for the coordinated promotion and delivery of development and change where this is most needed in the town centre, resort core and inner areas of Blackpool. A market approach would not provide any substantial development stimulus to support Blackpool's regeneration.

A range of high quality homes and employment in sustainable locations.

- A developer led market based approach would still deliver a level of new housing, focused more on greenfield development sites on the Blackpool eastern boundary – but with a lesser focus on regenerating the inner areas, town centre and resort core. There will also be expected to be a focus on higher value uses (such as retail and residential) as against meeting other needs (such as for employment development). The lack of a strategic planning framework would mean development would be brought forward in a more fragmented pattern, and such an uncoordinated approach would be less likely to tackle key problems and secure a sustainable future for Blackpool.

Make most of built and natural environment, infrastructure and facilities.

- A market led approach would generally lead to a more fragmented approach to development. The Greenfield focus for development would have a more adverse impact on areas of ecological and nature conservation importance. The lack of a comprehensively planned development would reduce the effectiveness of the coordinated planning of supporting infrastructure, services and facilities, as part of a properly connected and accessible land use and transport network.

Long term regeneration/ development of Blackpool & Fylde Sub-Region.

- A market led approach would provide no basis for the effective long term planning for Blackpool and the Fylde Sub-Region. It would undermine the planned coordinated development required to drive forward inner area regeneration, and potentially compete against it.

The potential to deliver quality.

- Quality developments could still be brought forward on individual schemes. However, a market led approach would fail to provide any impetus for a much needed wider and more pro-active planned strategy to raise all aspects of environmental quality for the residents, visitors and businesses.

Efficient transport and travel within Blackpool & Fylde Sub-Region.

- A market led approach would fail to provide any basis for the proper planning of a fully integrated transport system. There is a need to take a long term approach, focusing new development in the right locations and facilitating in advance the full range of transport requirements. Major highways and infrastructure improvements to the transport network would be severely compromised.

Impact on wider infrastructure and services provision.

- A market based approach would similarly undermine the proper planning of effective services and infrastructure. It is essential to take a longer term view in determining the best way forward for the provision of supporting services and the proper planning of the area.

Market Overview and Deliverability

While easier to develop and more attractive sites would still come forward, a market based approach would be very ineffective in delivering the wider aims of the Core Strategy. It would provide no certainty, and fail to provide the required impetus for inner area regeneration, which is a fundamental aim of the Core Strategy.

Critically, in Blackpool, whether in the heart of the resort or on its urban edge, the multitude of ownerships and existing uses mean that efforts to deliver strategic levels of development will be massively undermined unless supported by a properly planned statutory framework as a basis for the Council, other public sector, and private developers to work together to facilitate development. Without this the ambitions of the Core Strategy for Blackpool's major change will not be delivered.

4 **THE PREFERRED OPTION**

The examination of strategic choices available to Blackpool against the various spatial objectives for the Core Strategy has highlighted the strengths and weaknesses of each of the main options.

From this evaluation, it is concluded that the following strategic options should be discounted:

- Option 1 Urban Concentration
- Option 3 Peripheral Suburban Expansion
- Option 6 Market Driven Approach

Option 1 Urban Concentration has only limited merits, with concerns about any substantial further intensification of development within the existing urban area.

Option 3 Peripheral Urban Expansion is less well located to meet strategic needs and raises more environmental concerns than other alternatives.

Option 6 would fail to provide for any effective planning of Blackpool's future development, and would undermine its regeneration.

As has been emphasised, the choices available for Blackpool are very limited and it was recognised at the outset that the eventual preferred option is likely to be a matter of finding the right balance. It is concluded that the foundation of the Core Strategy must be based on a mix of the other three options:

- Option 2 Inner Area Regeneration
- Option 4 Marton Moss
- Option 5 Wider M55 Hub Growth Point

Fundamentally, the Core Strategy must prioritise regeneration, whilst providing the impetus for Blackpool's wider economic development and housing growth.

Option 2 (Inner Area Regeneration) targeting growth and development on the inner resort, town centre and residential core, is essential if the Core Strategy is to help bring about the radical economic, social and physical change requires – but without also providing new homes and jobs in sustainable locations on the edge of the existing urban area, it will not meet the community's needs and deliver the wider Vision of a New Blackpool.

Option 4, Marton Moss, is not favoured as a single focus for expansion as it would not effectively support the much needed wider economic growth, and could not realistically or desirably come forward as a single comprehensive development focus within the timescale of the Core Strategy to 2025.

Option 5, Wider M55 Hub Growth Point, provides a major development focus with a greater quantum and choice of development sites and potential for a mix of uses and longer term growth. A substantial focus for expansion on Marton Moss, however, would remain essential as part of a wider growth point development focus in and on the edge of Blackpool around the M55 junction.

The potential inclusion of the wider M55 Hub as part of the preferred option, however, is equally dependent on the decisions of Fylde Council. Fylde's Core Strategy Preferred Option has yet to be determined, with the Fylde Issues and Options report due to be published later in 2009. Closer alignment through joint working will be important in the development of a coordinated future development strategy for lands on the Blackpool/ Fylde boundary.

All of the broad Core Strategy spatial options for Blackpool included some level of expansion in south east Blackpool, including lands on Marton Moss. Work has been jointly commissioned by Blackpool/ Fylde from consultants to help further inform more detailed options for a wider M55 Hub Growth Point and help determine the most appropriate development strategy for these lands.

REPORT TO: EXECUTIVE
DECISION NUMBER: EX/40/2009
EARLIEST DATE FOR DECISION: 15th July 2009

MARTON MOSS AND THE M.55 HUB

Matter for Consideration:

To consider work undertaken to assess the need to develop and the constraints and potential of lands at Marton Moss to meet Blackpool's housing needs to 2026 through its Core Strategy.

Information:

The Council at its meeting on 11th March 2009 noted concerns over the inclusion of Marton Moss as part of the preferred spatial option of the Blackpool Core Strategy, as resolved by the Executive on 23rd February 2009.

The Council emphasised its priority for delivering houses in the inner wards subject to Government funding needed to transform the inner areas and requested the Executive to give further consideration to the scope to increase housing supply on brownfield land, to reduce the pressure for greenfield development.

To this end, the Executive was asked to prepare a comprehensive report on the future of Marton Moss, including open space requirements, recreation, horticulture and all other aspects, as well as housing, so as best to plan for an area which is regarded as precious by many Blackpool residents.

The attached report at Appendix 5a, to the Executive report, sets out the response to the Council's motion.

The report sets out Blackpool's current housing requirement and the different ways in which this should be accommodated. This includes the potential delivery of houses within the inner areas and the outstanding requirement for new development on the edge of Blackpool.

The report explains the master planning work that is being undertaken for the potential M.55 Hub development (which contains lands in Blackpool and Fylde) and the implications for the potential development of Marton Moss. The report then sets out in general terms a recommended approach to the development of lands at Marton Moss. It does not set out a detailed master plan for the Moss. The continuation of work on this would be dependent on the Executive's approval of the foregoing recommendation.

The conclusion of the report is as follows:

Blackpool needs to find land to accommodate 7,200 new homes between 2009 and 2026. Sites for approximately 2,500 new homes have been identified on vacant, derelict and underused land or through property conversions. The Core Strategy requires to identify lands for a further 4,700 new homes. With substantial Government investment, it is considered that a further 2,000 new homes could be developed within Inner Blackpool. There would remain an outstanding requirement for 2,700 homes to be met by new, largely greenfield, development on the edge of Blackpool.

New development on the edge of Blackpool is also fundamentally required to address the

lack of wider quality new housing, attract higher income households and provide choice for Blackpool's resident population, particularly for family housing. A major sustainable mixed use development on the edge of Blackpool is considered to have substantial additional benefits, particularly in terms of jobs, facilities, enhancements of the gateways into Blackpool and the Fylde, the creation of parks and green space as well as helping to enhance Blackpool's image to the outside world.

David Lock Associates has produced a preferred master planning option for this new Gateway development which also extends into lands within Fylde. A development of approximately 7,000 new homes is considered to be the optimum size to meet Blackpool and Fylde's housing requirements (both within and potentially beyond the current Plan periods) and to secure the ancillary benefits set out above. This development option includes lands at Marton Moss which is the only area of undeveloped land within the Blackpool boundary able to accommodate the 2,700 new homes.

We are proposing an organic approach to development of the Moss lands between Yeadon Way and School Road (but not to Division Lane) that seeks to maintain and where appropriate enhance the majority of existing homes, businesses and facilities on the Moss, maintain and develop the horticultural heritage of the Moss and strengthen the Moss landscape, wildlife habitats and access. This will lead to the developed areas of the Moss becoming more suburban than semi-rural.

The overall benefits to Blackpool of pursuing the M.55 Hub development, including lands within Marton Moss, are considered to significantly outweigh any disadvantages.

Does the information submitted include any exempt information? NO

Legal Considerations:

There are no legal considerations that need to be highlighted as a direct result of this report.

Personnel Considerations:

The development of proposals for Marton Moss and the wider M.55 Hub will be undertaken primarily by Planning Department staff in Blackpool and Fylde and by the assistance of specialist consultants.

Financial Considerations:

Financial allowance has been made within Government spending programmes to pursue the master planning of the M.55 Hub.

Performance Management Considerations:

The Council is required to find land to meet the housing targets set within the Regional Spatial Strategy. The implications of not doing so are set out within the report.

Risk Management Considerations:

Failure to identify land to meet the housing requirement would create a high risk that a Government Inspector would either direct the Council to allocate other sites put forward by the house building industry or review its proposals. In either instance, the consequent delays are likely to lead to the determination of major house building decisions through planning appeals. The form of housing growth would be determined by others rather than being decided by the Council in a sustainable way to support Blackpool's regeneration.

Relevant Officer:

Tim Brown, Chief Planning Officer

Relevant Cabinet Member:

Councillor M. Callow JP

Consultation Undertaken:

Work undertaken to assemble this report has been a primarily technical exercise that has involved officers from Blackpool and Fylde Councils. A technical steering group is established to develop the M.55 Hub proposals. The ultimate allocation of lands within the M.55 Hub requires to be taken forward through the respective Core Strategies of Blackpool and Fylde. Both will involve extensive consultation with stakeholders as well as examination in public before they can be adopted by the Councils. Approval of this report would not preclude organisations or individuals challenging the release of development land at Marton Moss through the development plan process. Ultimately, an independent Inspector will have to consider whether the approach proposed is "sound".

Background Papers:

- [Report](#)

Is this a key decision? YES

Forward Plan Ref. No: 12/2009

Is the decision required in less than 5 days? NO

Recommendations:

It is recommended that Blackpool's Core Strategy Preferred Option for accommodating housing and other land requirements to 2026 be developed incorporating the concept of a wider mixed use M.55 Hub within which lands at Marton Moss be allocated as follows: a) Between Yeadon Way and School Road for the phased development of 2,700 new homes and associated facilities whilst conserving existing key features and recreational provision and improving public access; b) Between School Road, Midgeland Road and Division Lane as an area safeguarded from development, maintaining and potentially strengthening policy restrictions on built development.

Reasons for Recommendations:

To set out the Council's position in principle regarding the development of lands at Marton Moss and to enable the on-going progression of the Blackpool Core Strategy and the M.55 Hub Master Plan.

Is the recommendation contrary to a plan or strategy adopted or approved by the Council? NO

Is the recommendation in accordance with the Council's approved Budget? YES

Other alternative options to be considered:

None

Policy, Overview, and Scrutiny Committee Chairman (where appropriate)

Date Informed: 7th July 2009

Date Approved: N/A

DECLARATION(S) OF INTEREST (if applicable)

None

Decision:

The Executive agreed the recommendation as outlined above namely: That Blackpool's Core Strategy Preferred Option for accommodating housing and other land requirements to 2026 be developed incorporating the concept of a wider mixed use M.55 Hub within which lands at Marton Moss be allocated as follows: a) Between Yeadon Way and School Road for the phased development of 2,700 new homes and associated facilities whilst conserving existing key features and recreational provision and improving public access; b) Between School Road, Midgeland Road and Division Lane as an area safeguarded from development, maintaining and potentially strengthening policy restrictions on built development.

Date:

15th July 2009

Reason for Decision:

To set out the Council's position in principle regarding the development of lands at Marton Moss and to enable the on-going progression of the Blackpool Core Strategy and the M.55 Hub Master Plan

Date of Publication:

14th September 2009

[\[Printer-friendly version \]](#)

BLACKPOOL CORE STRATEGY

THE POTENTIAL DEVELOPMENT OF LANDS AT MARTON MOSS

INTRODUCTION

The Council at its meeting on 11th March 2009 noted concerns over the inclusion of Marton Moss as part of the preferred spatial option of the Blackpool Core Strategy, as resolved by the Executive on 23rd February 2009.

The Council emphasised its priority for delivering houses in the inner wards subject to Government funding needed to transform the inner areas and requested the Executive to give further consideration to the scope to increase housing supply on brownfield land, to reduce the pressure for greenfield development.

To this end, the Executive was asked to prepare a comprehensive report on the future of Marton Moss, including open space requirements, recreation, horticulture and all other aspects, as well as housing, so as best to plan for an area which is *“regarded as precious by many Blackpool residents”*.

BACKGROUND

The Core Strategy is the statutory planning document that will set out the Council's strategic development plan and planning policies for the next 15-20 years. The Core Strategy Issues and Options document was approved by Blackpool Council in June 2008, and was subject to public consultation from mid July until the end of September 2008.

An interim report was made to Executive on February 23rd 2009 on the key conclusions arising from the Issues and Options document and sought agreement of a preferred spatial option. Earlier presentations were made to the Local Development Framework Members Working Group and to a Blackpool/Fylde Joint Member Working Group in January 2009.

The Executive resolved on 23rd February that a mix of Options 2, 4, and 5 (Inner Area Regeneration, Marton Moss, and wider M55 Hub Growth Point) be approved as the Blackpool Core Strategy Preferred Option, and that this Preferred Option should be the basis for the draft Core Strategy to be prepared for consideration by Executive and for subsequent consultation.

Following the concerns expressed at Council at its meeting on 11th March 2009, the attached report sets out the steps that have now been taken to provide the comprehensive further information requested on Marton Moss, to inform the detailed preparation of the Council's draft Core Strategy Preferred Option document.

The sections that follow set out the detailed information which has now been researched and provided to address these concerns:

- Housing Capacity issues - a review of Blackpool's housing supply and the potential to maximize the contribution to future development from brownfield sites including inner area regeneration;
- David Lock Associates (jointly commissioned by Blackpool and Fylde Councils) is currently finalising a preferred master planning option for the wider M55 Hub lands (including Marton Moss) to inform Core Strategy preparation of both Councils;
- A background paper has been prepared by the Council Planning Department setting out key development issues, demographic data and land use characteristics of Marton Moss.;
- A Characterisation Study of the Moss has been commissioned, and an interim report by Archaeo-Environment Ltd has been completed;
- An Ecological Assessment of the Moss has been commissioned, and an interim report by Bowland Ecology has been completed;

HOUSING REQUIREMENT AND CAPACITY

The Blackpool Housing Requirement

- The North West Regional Spatial Strategy requires that Blackpool provide through its planning policies and land allocations and the granting of planning permissions for the development of **8,000 homes** 2003-2021. This represents double the previous requirement. Despite the recent downturn in the economy and the housing market, Government has reaffirmed the need to provide considerably more housing to meet the need from existing and projected future households and that this will be afforded considerable weight where housing proposals are considered at appeal.
- The time horizon for the Core Strategy is required to look to 2026. The pro-rata provision of an additional 5 years supply of housing would require an additional 2,200 dwellings, with a consequent requirement for **10,200** homes 2003-2026. Of these 10,200 homes:
 - A total of **1,738** homes have already been built, at April 1st 2009.
 - A total of **1,261** homes were either under construction or already had planning permission for development.
- The outstanding net requirement for new sites to be identified for development 2009-2026 is therefore around **7,200** homes.

Meeting the Blackpool Requirement

The outstanding requirement for 7,200 new homes will be met from the following sources:

1. **Sites within the existing Blackpool urban area on vacant, derelict and underused land.** The 2008 Strategic Housing Land Availability Assessment undertook a detailed assessment of housing sites in the existing urban area, and identified further potential for about 2,100 new dwellings from existing sites. Around 200 dwellings need to be deducted from this figure as they have since been granted planning permission (and thus already counted above). This reduces the figure to 1,900. It is estimated around 90% (1,700 dwellings) could potentially come forward from such sites.
2. **Conversions and the re-use of existing buildings.** Based on past trends an allowance of 800 new dwellings is made for further conversions, over and above existing committed sites.
3. **The identification of new sites within the Development Plan.** Taking account of the “windfall” allowance in 1 and 2 above means that the Core Strategy needs to identify sites for 4,700 new homes between 2009 and 2026 (7,200 minus 2,500).

The Preferred Option spatial strategy seeks to identify locations for the required new **4,700 homes** from two main sources:

Inner Area Regeneration

In line with the March Council resolution, the Core Strategy seeks to prioritise new development within Blackpool’s central area in order to:

- Redress the housing and holiday accommodation market challenges that are an integral cause of the economic and social problems facing Blackpool;
- Create quality places and provide a choice of quality homes in the inner areas that people can afford and where people want to live;
- Create strong, vibrant and desirable neighbourhoods that contribute positively to the image of Blackpool.

Significant steps are being taken towards achieving this through the evolving regeneration plans, including Action Area Plans being progressed for North Beach, Foxhall and South Beach. Based on the evolving plans for the resort, it is estimated that 1,500 additional homes could come forward through inner area regeneration initiatives currently being pursued in North Beach, Foxhall and South Beach. In addition, an allowance could appropriately be made for private sector market led seafront developments which could increase this figure towards 2,000 homes.

How much can be achieved will be dependent on the level of public funding that can be harnessed to deliver the scale of change required for the regeneration of the resort core. Bids to use £35 million funding from the HCA (Homes and Communities Agency) are currently being appraised and assessed. An initial £35m may gap fund no more than about 400 homes. It is currently estimated the potential delivery of around 2,000 additional new homes from regeneration in the resort core would require around £150 million public funding. These figures are drawn from the work done by GVA Grimley on behalf of the Council to assess the options and costs relating to housing intervention.

The overall cost of intervention to change the housing market over a 15 year period and deliver a higher figure of around 3,500 new homes was estimated at £900m, with approximately £650m being private sector investment and £250m being public investment. The work predated the current economic situation so it is likely that the balance between public and private spend will require a greater input from the public purse to achieve matching private investment, with £350m now a required figure.

With investment of around £350 million, inner area redevelopment could be increased to around 3,500 homes, reducing requirements to be met on the edge of Blackpool to about 1,200 homes (4,700 minus 3,500). This is not considered a tenable stance for the Council to adopt for the following reasons:

- a) The requirement to demonstrate to a Government Inspector that the identified 15 year housing supply is realistically deliverable. The prospect of the Council securing a Government commitment to a long term programme of financial support for inner area intervention and housing delivery on this scale must be considered extremely slim. Without such commitment, an Inspector examining the soundness of the Council's Core Strategy within the next 2 years could not accept an assumption that such funding will be forthcoming.

This would create a high risk that the Inspector would either direct the Council to allocate other sites put forward by the house building industry or review its proposals. In either instance, the consequent delays are likely to lead to the determination of major house building decisions through planning appeals. The form of housing growth would be determined by others rather than being decided by the Council in a sustainable way to support Blackpool's regeneration. Currently Kensington Developments alone has appeals for approval of around 2,000 homes at Moss House Road (within Blackpool) and at Hollywood Nurseries, Whitehills; at Queensway and at Lytham Quays (within Fylde Borough).

- b) A range of housing choice is required to create a more balanced housing market in terms of supporting Blackpool's regeneration. Undue reliance upon inner area sites and sea front apartments, even should such an approach be realistically achievable, would be unlikely, in isolation, to achieve this.

It remains essential that the Core Strategy is based on a realistic assessment of change that can be achieved. The delivery of 2,000 new homes would require a major scale of public funding which is not assured. If the Council is not to run very serious risks in terms of the future development of the Town, then 2,000 net additional homes from Inner Area Regeneration (over and above the strategic land assessment figure) is considered the highest figure that could appropriately and tenably be put forward.

With potential planned provision of around **2,000 additional homes** from resort regeneration, there would remain an outstanding requirement of **2,700 homes** to be met by new, largely greenfield, development on the edge of Blackpool.

New edge of Blackpool development

To meet this need, preparation of the Council's Core Strategy will seek to prioritise a range of new housing through a sustainable extension on the edge of Blackpool - with Marton Moss and the M55 Hub identified as the other main elements of the Council's Core Strategy Preferred Option.

The figure of **2,700 dwellings** represents a significant reduction from the figure set out at the earlier Issues and Options stage of the Core Strategy, reflecting the updated housing supply information, and increased allowances set out above for both windfall developments and resort regeneration.

Such new edge of Blackpool development is seen as not just meeting a quantitative need, but is fundamentally required to address the lack of wider quality new housing, attract higher income earning households and provide sufficient choice for Blackpool's resident population, particularly for family housing.

THE M.55 HUB

David Lock Associates has been commissioned by Blackpool and Fylde Councils to produce a master plan for the M.55 Hub. This looks at the optimum form for potential extension of the Blackpool urban area to the south east. Housing, employment land, community infrastructure and green space would be incorporated within a high quality and sustainable mixed use development. DLA has been briefed to be blind to local authority boundaries and Development Plan timescales in order to plan for a development that would have the greatest long term benefits for Blackpool and the Fylde as well as making a significant contribution to meeting the long term housing needs of both authorities.

DLA's preferred master planning option is appended to this report. In order to set out the key aspects of this plan in a readily digestible form, DLA has produced a prospectus for the M.55 Hub and this can be viewed in the member's library and at www.blackpool.gov.uk

The conceptual master plan that sits at the heart of this prospectus encapsulates the following vision.

The Vision

The Plan is to create a cluster of residential neighbourhoods around a new District Centre at the junction of Progress Way and Cropper Road. These neighbourhoods would accommodate approximately 7,000 new homes supported by a range of community facilities. The District Centre would incorporate a new secondary school, shops and other facilities. Whitehills Business Park would be extended and potentially supplemented by new business land between Preston New Road and the M.55.

The Hub would create new gateways to Blackpool and the Fylde, characterised by woodland and water. A strong emphasis on landscaping throughout the development would create parkland corridors out into a new Country Park between Blackpool and St. Anne's. The green belt would be extended.

Walking and cycling would be the preferred methods of travel within the Hub. Express bus links would connect directly into Blackpool Town Centre.

THE IMPLICATIONS FOR MARTON MOSS

This report has set out the outstanding requirement to identify land for 2,700 new homes on the edge of Blackpool. In response to the Council's resolution, we have undertaken further detailed work on Marton Moss and this is set out in the following sections of this report. The conclusion of this work has led us to re-visit, whether, how much and how the Moss could be developed to meet Blackpool's requirement.

It remains the case that Marton Moss is the only major area of undeveloped land within the Blackpool local authority boundary. If Blackpool is to provide the new homes that Blackpool needs and provide a re-balancing of the overall housing market, development of some of the Moss lands is a necessity.

Although our estimates for housing delivery within Inner Blackpool do require considerable Government assistance, we have increased the potential housing numbers against the inner areas and reduced the edge of Blackpool requirement by 1,000+ homes.

Our estimated need for 2,700 homes would **not** require the Moss to be developed in its entirety. The reduced number also provides flexibility in how intensively any developed Moss lands would be built out.

In considering how this requirement is best accommodated and in shaping the development of the DLA work we have taken into account three other areas of work as follows:-

- A Marton Moss background paper prepared within the department. This was already in draft form at the time of the March Council Motion but has been extended in its scope and depth in response to the concerns raised;
- The commissioning of Archaeo Environments to undertake a "characterisation" of the built and natural environment. This looks at the historic development of Marton Moss and the particular built and landscape characteristics that the Council should take on board in considering the future of the area;
- The commissioning of Bowland Ecology to undertake a Phase 1 Habitats Survey. This identifies species or habitats of importance and the measures required to protect or enhance these.

It should be stressed that we have been cognisant of the issues that are being detailed in the three reports in developing the Core Strategy. Nonetheless, the aforementioned reports will further inform the development of the Strategy as well as the Master Plan for the M.55 Hub if the principle of this is supported by Blackpool and Fylde Councils.

A summary of the above documents is attached as Appendix B. The Full Background Paper and the Interim Characterisation and Habitats reports can be viewed in the member's library and at www.Blackpool.gov.uk

OUR RECOMMENDED APPROACH TO MARTON MOSS DEVELOPMENT

On the basis of the extensive survey, analysis and master planning work summarised above we are proposing an approach that seeks to:

1. Allow for the majority of existing homes, businesses and community facilities within Marton Moss to be retained. We believe that many businesses and facilities would be considerably strengthened by the presence of a new population catchment on their doorstep;
2. Maintain the horticultural heritage of the Moss by retaining an emphasis on locally grown produce and providing allotments;
3. Strengthen the pattern of trees, woodlands and hedgerows that bisect the Moss as a basis for creating “pockets” of development well screened from existing homes and from each other;
4. Improve and extend the existing limited network of public footpaths. The connection of these into the proposed new Country Park would considerably improve local opportunities for passive recreation;
5. Take a very sensitive and organic approach to developing individual fields and plots of land within the Moss - individual developments of character rather than the blanket developments of the past;

This approach would be manifested within the three main areas of the Moss as follows:

Land Between Yeadon Way and Progress Way

These lands would be allocated for development within the Core Strategy with a reduction in housing numbers from the approximately 2,000 originally envisaged to approximately 1,500. Approximately 500 homes could be developed on the Moss House Road site with 1,000 on the land to the east of Midgeland Road. This would enable the provision of substantial green areas within and between new development areas.

Land Between Progress Way and School Road

These lands would be allocated for development within the Core Strategy for approximately 1,200 new homes at much lower densities than originally envisaged

Land Between School Road, Midgeland Road and Division Lane

These lands would be safeguarded from development with their existing character maintained

It would be misleading to claim that the developed Moss lands would not change in character. They would become more suburban than semi rural but in the form set out above rather than as manifested in some of the suburban areas of south east Blackpool developed in the 20th century (the *eighty acres* lands to the north of the Moss House Road application site). We believe that the benefits of this approach to Blackpool and indeed to the local area considerably outweigh the loss of openness that currently characterises the Moss.

CONCLUSION

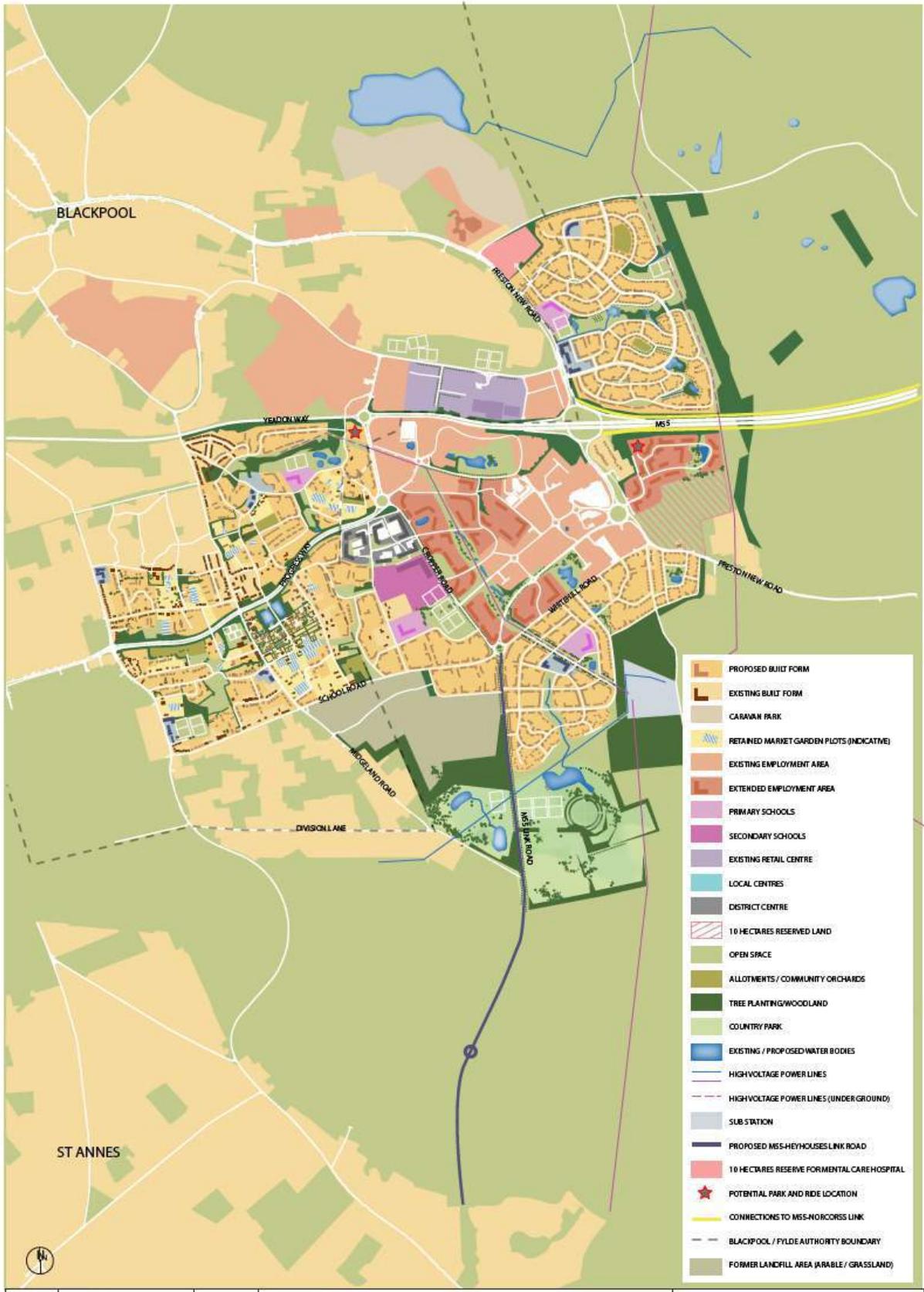
Blackpool needs to find land to accommodate 7,200 new homes between 2009 and 2026. Sites for approximately 2,500 new homes have been identified on vacant, derelict and underused land or through property conversions. The Core Strategy requires to identify land for a further 4,700 new homes. With substantial Government investment into Inner Blackpool, it is considered that a further 2,000 new homes could be developed within Inner Blackpool. There would remain an outstanding requirement of 2,700 homes to be met by new, largely greenfield, development on the edge of Blackpool.

New development on the edge of Blackpool is also fundamentally required to address the lack of wider quality new housing, attract higher income households and provide choice for Blackpool's resident population, particularly for family housing. A major sustainable mixed use development on the edge of Blackpool is considered to have substantial additional benefits, particularly in terms of jobs, facilities, enhancements of the gateways into Blackpool and the Fylde, the creation of parks and green space and helping to enhance Blackpool's image to the outside world.

David Lock Associates has produced a preferred master planning option for this new Gateway development which also extends into lands within Fylde. A development of approximately 7,000 new homes is considered to be the optimum size to meet Blackpool and Fylde's housing requirements (both within and potentially beyond the current Plan periods) and to secure the ancillary benefits set out above. This development option includes lands at Marton Moss which is the only major area of undeveloped land within the Blackpool boundary able to accommodate the 2,700 new homes.

We are proposing an organic approach to development of the Moss lands between Yeadon Way and School Road (but not to Division Lane) that seeks to maintain and where appropriate enhance the majority of existing homes, businesses and facilities on the Moss, maintain and develop the horticultural heritage of the Moss and strengthen the Moss landscape, wildlife habitats and access. This will lead to these areas of the Moss becoming more suburban than semi rural but the overall benefits to Blackpool of pursuing the M.55 Hub development including lands within Marton Moss are considered to significantly outweigh any disadvantages.





- PROPOSED BUILT FORM
- EXISTING BUILT FORM
- CARAVAN PARK
- RETAINED MARKET GARDEN PLOTS (INDICATIVE)
- EXISTING EMPLOYMENT AREA
- EXTENDED EMPLOYMENT AREA
- PRIMARY SCHOOLS
- SECONDARY SCHOOLS
- EXISTING RETAIL CENTRE
- LOCAL CENTRES
- DISTRICT CENTRE
- 10 HECTARES RESERVED LAND
- OPEN SPACE
- ALLOTMENTS / COMMUNITY ORCHARDS
- TREE PLANTING/WOODLAND
- COUNTRY PARK
- EXISTING / PROPOSED WATER BODIES
- HIGH VOLTAGE POWER LINES
- HIGH VOLTAGE POWER LINES (UNDERGROUND)
- SUB STATION
- PROPOSED M55-HY/HOUSES LINK ROAD
- 10 HECTARES RESERVE FOR MENTAL CARE HOSPITAL
- POTENTIAL PARK AND RIDE LOCATION
- CONNECTIONS TO M55-HO/CROSS LINK
- BLACKPOOL / FYLDE AUTHORITY BOUNDARY
- FORMER LANDFILL AREA (ARABLE / GRASSLAND)

02/07/09	BBC 001 - 014 - 04	1:10 000 @ A1
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INDICATIVE OPTION

M55 Hub Growth Point Conceptual Masterplan

David Lock Associates
Town Planning and Urban Design

APPENDIX B

THE KEY CHARACTERISTICS OF MARTON MOSS

The Planning Department has produced a Marton Moss background paper to outline the key issues that have been considered in determining the planning approach set out in the foregoing section. To supplement this, we have appointed Archaeo Environments to undertake a “characterisation” of the built and natural environment. This is looking at the historic development of Marton Moss and the particular built and landscape characteristics that the Council should take on board in considering the future of the area. We have also appointed Bowland Ecology to undertake a Phase 1 Habitats Survey. This will identify any species or habitats of importance and the measures required to protect or enhance these.

It should be stressed that we have been cognisant of the issues that are being detailed in the three reports in developing the Core Strategy. Nonetheless, these will further inform the development of the Strategy as well as the Master Plan for the M.55 Hub if the principle of this is supported by Blackpool and Fylde Councils.

The Background Paper and Interim Characterisation and Habitats reports can be viewed in the member’s library and at [insert weblink]. The main findings and how these have influenced our proposed approach are as follows:

Description

Marton Moss covers an area of 207 hectares – 6% of Blackpool’s land area. Its character is different from the more open countryside to the south and east with the area now largely a mix of horse grazing land, dwellings set in large gardens, together with former and remaining glass houses. It contains a number of agricultural, horticultural and urban fringe businesses as well as sports pitches and other recreational facilities. The majority of the Moss is good quality grade 2 agricultural land with some moderate quality grade 3 land to the north. The agricultural productivity of the area has dropped considerably since the heyday of the Moss horticultural industry.

The Moss is bounded by Yeadon Way to the north and Division Lane to the south. To the west is Common Edge Road. To the east, the Blackpool/Fylde boundary separates it from wider areas of adjoining moss lands and more open countryside within Fylde Borough. The Moss lands are flat and relatively low lying.

Employment

More than 300 people are employed on Marton Moss but only around 20 remain in agriculture and horticulture, highlighting the loss of glass houses and the declining horticultural importance of an area that historically provided many of Blackpool’s fruit and vegetables.

Population

More than 1,400 people live on the Moss in a mixture of individual houses along the lanes that are characteristic of the area and within small housing schemes.

Character

The Moss is criss crossed by roads and lanes, most of which are lined by scattered dwellings and small businesses. Behind these lanes, the land is more open, with small fields and agricultural/horticultural buildings. This land use pattern is not evident on the ground but can be well seen on the attached aerial photograph.

There are few original buildings typical of the historic origins of the Moss. Most buildings have been developed gradually in a dispersed pattern throughout the 20th century. The Moss contains a wide variety of building types and ages and there is no defining architectural style. Indeed, this variety is what defines much of the moss land character and the way in which the Council would approach any development.

The hedgerows and trees that line many of the lanes give the impression of a well treed semi rural landscape. However, the aerial photograph demonstrates that the Moss as a whole contains no more than a few pockets of woodland and that many of the trees and shelter belts are somewhat denuded.

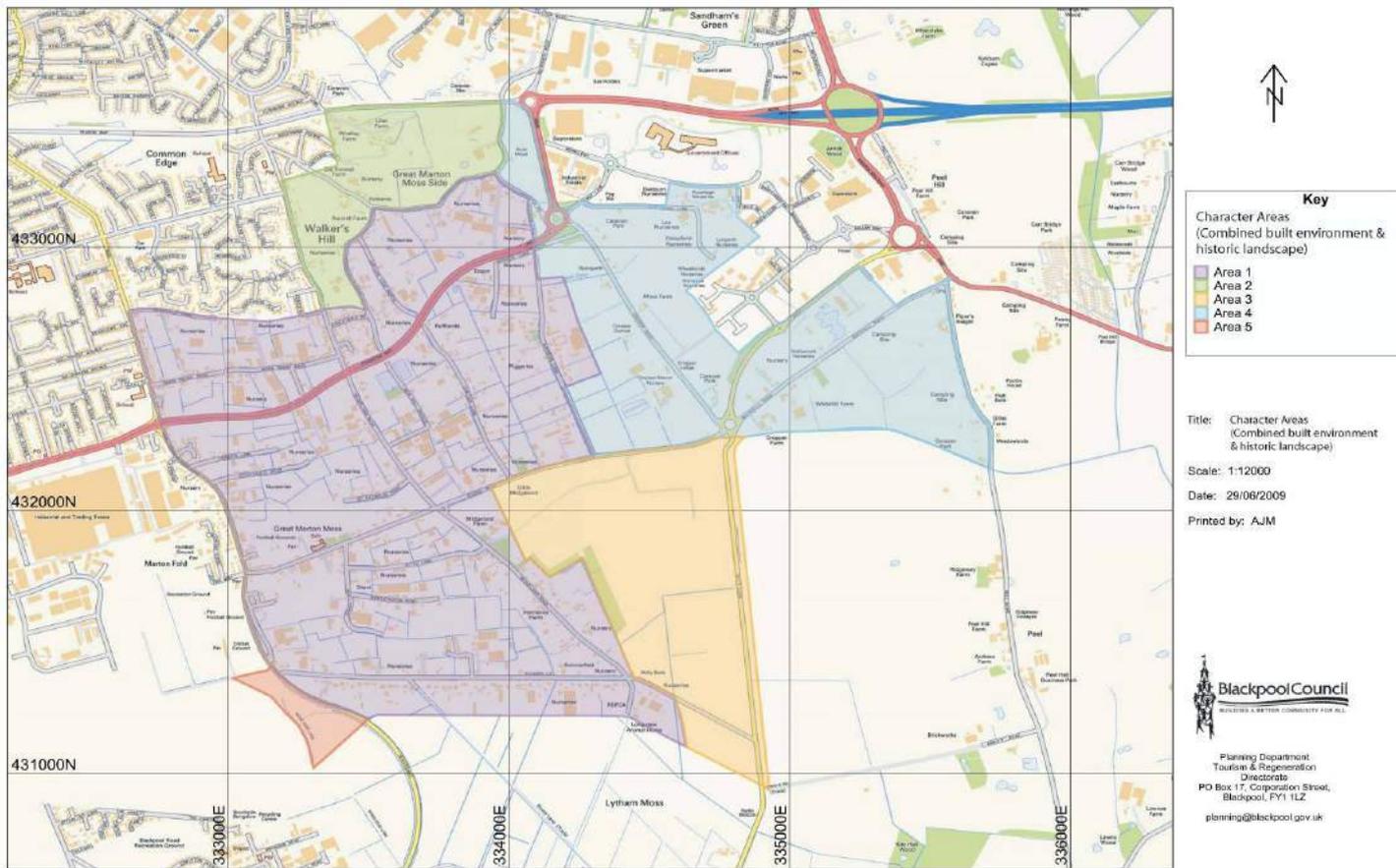
There are a number of footpaths on the Moss, mainly utilising unmade tracks and lanes. Beyond these relatively few paths, public access is limited.

The Council has appointed ArchaeoEnvironments to undertake a comprehensive “characterisation of Marton Moss” which is subject to a separate report. This breaks the area into five separate “character areas” (see plan on page 12) which are summarised as follows:

- 1. Character Area 1 (The Mosslands) consists of the areas of small piecemeal post medieval enclosure along Division Lane, Midgeland Road up to Chapel Road and west to Common Edge Road, surrounding by busy arterial routes. It consists of the earliest cobbled buildings through to modern detached bungalows. Within the busy communication infrastructure it is an enclosed leafy landscape based around lanes, rectangular fields and drains with views limited to gaps in hedgerows across open paddocks. Any future development within this character area has the opportunity to be creative while exploring the use of red brick, ridge tiles, bargeboarding and a similar scale to fit in with traditional styles, or it has the opportunity to create a new vernacular for the mossland built from sustainable materials and energy sources in the way that development in this area started in the 18th century with locally available materials. There are means to absorb development into the area whilst retaining many of its essential characteristics i.e., by keeping the main infrastructure of quiet lanes, drains and hedgerows and by retaining the overall field pattern and some open space. In either case the original field boundaries should be retained as a link with the past, as wildlife corridors and as a way of softening the effects of development. This will create challenges in terms of highways requirements if the rural character is to be maintained.*

2. *Character Area 2 (Walkers Hill) consists of an area of Ancient Enclosure with some amalgamation around Runnells Farm in the north west. This landscape also has some old historic buildings, but this is combined with some degradation and traffic noise from the adjacent Yeadon Way. Although the building stock is much degraded historically, the modern exteriors may mask earlier building fabric. They should therefore be recorded with historic analysis carried out prior to development decisions being made; this will help to identify what features should be retained. This may also require some historic building recording during works so that intrusive recording can take place and provision has been made for this in PPGs 15 and 16. This area is also of high archaeological potential and therefore any development proposals should be accompanied by a desk based assessment and if necessary and archaeological evaluation exploring this further.*
3. *Character Area 3 is a featureless area of modern enclosure around Wild Lane which has been rationalised into larger fields. It is largely devoid of settlement and is marred by tall pylons. As a landscape which has undergone significant recent change it has the capacity to withstand further change, although this will result in a change of character. It offers the opportunity for high quality design and the possibility of creating a new vernacular and local distinctiveness.*
4. *Character Area 4 is an area of post medieval planned enclosure and modern enclosure with a mixture of open and enclosed views. It is suffering from the creep of light industrial units and encroaching busy roads. It is still semi-rural in most places and the retention of the leafy lanes and hedgerows where they exist, will limit the impact of development.*
5. *Character Area 5 is a small plot of land now divorced from the rest of the study area by the rerouting of Common Edge Road. It contains no buildings but does include the former Moss Lane. The retention of hedgerows will help to protect any future development from noise pollution and soften the impact of development, but the old Moss Land should be retained as a quiet lane or bridleway.*

Many of the buildings in all character areas have suffered through the inappropriate replacement of windows and doors and in some cases, new renders and elevation treatments. However a number of buildings have also been tentatively identified for inclusion in the local list as well as recommendations on the significance of each building type. Recommendations have also been made to continue the tradition of using sustainable local materials and local energy wherever possible.



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Ecology

Habitat on the Moss consists primarily of trees and hedgerows, small wooded areas, ditches and a limited number of ponds. Typical of many such countryside areas, the water bodies could house water voles and/or great crested newts which are protected species. These require more detailed Phase 2 survey which will be taken forward. If their presence is confirmed, mitigation/re-location measures would require to be put in place if these habitats are disturbed.

The Council has appointed Bowland Ecology to undertake a Phase 1 habitats survey of the M.55 Hub which is subject to a separate report. The main “findings” in respect of Marton Moss are as follows:

The remaining area along the western boundary of the study area is predominately residential interspersed by small holdings. Areas of interest include an area of marshy grassland in the north eastern corner which is also designated in part as a Biological Heritage Site. There are a number of ponds in this area that could support great crested newts and the dyke system in the south is known to have supported water voles. The network of gardens, hedgerow and pasture will provide a number of suitable nesting sites for birds. Natural England have also identified two UK BAP habitats in this area (reed bed and coastal floodplain grazing marsh).

We would expect the incorporation of new habitats to be a priority for any development of the wider M.55 hub and that the end state ecological value would significantly exceed the current state.

Infrastructure

Yeadon Way, Progress Way and Whitehills Road are the major roads servicing Marton Moss. These would form the basis for major access into any future development. There is a need for such development to respect the network of lanes throughout the Moss although some of these would inevitably require to be re-modelled to service new development areas.

There is no risk to the Moss of tidal or alluvial flooding. The main issue is the drainage of surface water. The Moss is currently bisected by numerous ditches. These create the potential for larger water bodies to operate as sustainable urban drainage systems (SUDS). Any development would require to be accompanied by a Drainage Area Plan that would demonstrate how foul and surface water would be drained from the Moss areas.

There are numerous community facilities already on the Moss – St. Nicholas C of E School, a GP and a dentist, numerous sports clubs, a grocery store and a newsagent. There is no reason that these facilities would not continue to operate. Indeed, they would potentially be considerably strengthened by an increase in population around the M.55 hub.]

REPORT TO: EXECUTIVE
DECISION NUMBER: EX/20/2010
EARLIEST DATE FOR DECISION: 10th March 2010

BLACKPOOL CORE STRATEGY : DRAFT PREFERRED OPTION

Matter for Consideration:

The attached Blackpool Core Strategy Draft Preferred Option is the spatial expression of the Council's Sustainable Community Strategy. It sets out the Council's draft strategic policies and development proposals to deliver its Vision for Blackpool to 2026

Information:

Blackpool's Core Strategy Preferred Option has been informed by the findings of a number of different studies. It seeks to provide the statutory planning framework which will facilitate and help the continued delivery of the required fundamental physical, economic and social change which is seen by the Council and its partners as essential to Blackpool's future.

The earlier Core Strategy Issues and Options document was approved by Council in June 2008 with consultation in Autumn 2008. The Council's February and July 2009 reports subsequently approved the preparation of the Core Strategy Preferred Option document based on:

- a primary focus on maximising regeneration of the town centre, resort core and inner areas
- a supporting and secondary focus for new development at Marton Moss/ the M55 Hub.

The Preferred Option has been prepared on this basis. The overall spatial focus of the Core Strategy Preferred Option is on regeneration, diversification and growth. It sets out a balanced approach to the future growth and development of homes, jobs, supporting facilities and services, and seeks to address the realities of past decline by restructuring and promoting a 21st century resort and town centre offer.

It provides the Council's key strategic policy framework on a range of issues including the Central Station site, Winter Gardens, and the regeneration of the resort neighbourhoods of Foxhall, South Beach and North Beach. It also sets out the Council's proposed future approach to the development of a stronger, higher quality and more focused Blackpool holiday accommodation offer, with the Promenade continuing to be the shop window of the resort alongside six identified main holiday accommodation areas.

The priority focus of the Core Strategy is on pursuing the revitalisation of the town centre, resort, and inner area core, Proposals for supporting growth at Marton Moss seek to meet future housing and related community needs which cannot be met in the existing urban area, increasing the wider choice and quality of housing in a way that complements and supports central area regeneration.

Wider proposals and policies are set out in the document to support the future development of a balanced, healthier and greener Blackpool. It includes a range of policies to enhance its quality as a place to live, and to effectively manage future development in a way which safeguards its natural resources, minimises adverse impacts of new development and fully takes account of flood risk, energy and wider climate change issues.

The proposals of the Blackpool Core Strategy Preferred Option are summarised in their broadest terms on the Core Strategy Key Diagram.

A presentation of the Core Strategy Preferred Option was made to the Blackpool Strategic Partnership on 18th February who gave its endorsement to the document for public consultation.

Does the information submitted include any exempt information? NO

Legal Considerations:

The Blackpool Core Strategy, when adopted by the Council, will be the key strategic spatial document forming part of the Council's statutory Local Development Framework.

Personnel Considerations:

The Blackpool Core Strategy is being resourced by existing staff within the Development Plans and Projects Division.

Financial Considerations:

This work is being undertaken within existing budgetary provisions. Preparation and consultation on the Blackpool Core Strategy is accounted for in the Business Plan and budget for the Planning Department. It will be subject to independent examination by the Government that is likely to entail significant expenditure, primarily in 2010/2011. Costs and budgets for this expenditure will be identified in advance.

Performance Management Considerations:

The preparation of the Blackpool Core Strategy is a key component of the Council's Local Development Scheme

Risk Management Considerations:

The Core Strategy is the document which will provide the statutory planning framework to enable and assist delivery of Blackpool's increased housing and other future development requirements to meet its twin needs for regeneration and growth. Without its progress, acquisition, land assembly and planning approval for key regeneration and development projects will be substantially undermined and delayed. The potential need for cooperation and joint consideration of development needs on the Blackpool/ Fylde boundary will in future require increasing alignment with the Fylde Core Strategy process, which could delay future progress.

Relevant Officer:

Tim Brown, Chief Planning Officer

Relevant Cabinet Member:

Councillor M. Callow JP

Consultation Undertaken:

The earlier Core Strategy Issues and Options document was approved by Council in June 2008, and subject to public consultation. The approval of the Preferred Option document will be followed by wider more detailed consultation to inform the way forward and ensure the soundness of the Core Strategy public consultation process.

Background Papers:

None

Is this a key decision? NO

Is the decision required in less than 5 days? NO

Recommendations:

That the Blackpool Core Strategy Preferred Option is approved for public consultation. That officers be authorised to make appropriate minor amendments to finalise the consultation document, along with relevant supporting publicity. That the proposed holiday accommodation area boundaries are agreed for consultation in a separate Supplementary Planning Document, with its final content to be approved by the Cabinet Member for Tourism and Regeneration.

Reasons for Recommendations:

To progress preparation of the statutory planning framework to support Blackpool's future regeneration and growth.

Is the recommendation contrary to a plan or strategy adopted or approved by the Council?

NO

Is the recommendation in accordance with the Council's approved Budget?

YES

Other alternative options to be considered:

The earlier Issues and Options Report fully set out a range of alternative strategic development options, which have been considered in detail. Further alternatives are set out in the Preferred Option document, where appropriate, on certain key issues.

Policy, Overview, and Scrutiny Committee Chairman (where appropriate)

Date Informed: N/A

Date Approved: N/A

DECLARATION(S) OF INTEREST (if applicable)

None

Decision:

The Executive agreed the recommendation as outlined above namely: 1. That the Blackpool Core Strategy Preferred Option is approved for public consultation. 2. That officers be authorised to make appropriate minor amendments to finalise the consultation document, along with relevant supporting publicity. 3. That the proposed holiday accommodation area boundaries are agreed for consultation in a separate Supplementary Planning Document, with its final content to be approved by the Cabinet Member for Tourism and Regeneration

Date:

10th March 2010

Reason for Decision:

To progress preparation of the statutory planning framework to support Blackpool's future regeneration and growth.

Date of Publication:

12th March 2010

[[Printer-friendly version](#)]

Appendix E – Preferred Option: Consultation Material

Press Release 6th May 2010

HAVE YOUR SAY ON THE FUTURE OF BLACKPOOL

With the Election over, public consultation begins on Monday, 10th May on the Council's new Plan for Blackpool to 2026. The plan's focus is overwhelmingly on inner area regeneration, but also including supporting growth.

Public consultation will continue on the Blackpool Core Strategy Preferred Option until 19th July and the Council is keen to know residents views.

The document sets out the Council's plans to secure a more prosperous and healthy Blackpool by addressing the realities of past decline. Two big local issues highlighted during the General Election campaign are the proposed changes to the holiday areas, and the future of Marton Moss.

Much has and is being done in the resort and town centre through key projects like St Johns, the Promenade Headlands, the Tramway, and the recent acquisition of the Tower and Winter Gardens but it is crucial Blackpool also gets to grips with the wider need for change across the inner area neighbourhoods and resort areas if the town is to move forward.

The Council's new plan accordingly sets out further proposals for the town centre but a key issue is its proposals for a remodelling of the holiday areas to reflect today's Blackpool holiday market. The plan also seeks to create a better balanced mix of housing – with the emphasis in both being on the need for high quality holiday accommodation alongside new quality single family homes and high quality apartments.

The proposed development focused on Marton Moss will help meet the identified housing growth needs of Blackpool and seeks to provide a wide range of new housing close to the M55 gateway to Blackpool within a strong landscaped setting.

Blackpool will not secure a brighter future without facing some difficult challenges, and unless positive steps are taken to support the delivery of wider change across Blackpool's inner areas and on the edge of Blackpool, the transformation that is needed to promote a new and better 21st century Blackpool will not happen.

You can view the Council's Core Strategy Preferred Option, and make comments on the forms provided at the main Council offices, at all local libraries, and on line at:

<http://www.blackpool.gov.uk/corestrategy2010>

A number of public exhibitions and meetings will be held throughout the consultation period, and will be publicised in advance on the Council's website and in the local areas.



Blackpool Council

Planning and Compulsory Purchase Act 2004

The Town and Country Planning (Local Development) (England) Regulations 2004 (as amended, 2008, 2009)

Core Strategy – Preferred Option

Blackpool Council has produced the Blackpool Core Strategy – Preferred Option, which seeks to create a framework for a more prosperous and healthier Blackpool. The Core Strategy sets out the Council's draft strategic and development proposals to deliver the Council's Vision for Blackpool in 2026.

The Preferred Option and Sustainability Appraisal are available for viewing and download from the Council's website www.blackpool.gov.uk/corestrategy2010. They are also available for inspection at the following locations during normal opening hours:

1. Main reception Municipal Buildings, Corporation Street, Blackpool, FY1 1LZ
2. Blackpool Central Library, Queen Street, Blackpool, FY1 1PX
3. Anchorsholme Library, Luton Road, FY5 3RS
4. Bispham Library, Devonshire Road, FY2 0HH
5. Boundary Library, Bathurst Avenue, FY3 7RW
6. Layton Library, Talbot Road, FY3 7BD
7. Mereside Library, 4b Crummock Place, FY4 4TP
8. Palatine Library, St Annes Road, FY4 2AP
9. Revoe Library, Revoe Street, FY1 5HN
10. Blackpool Enterprise Centre, Lytham Road, FY4 1EW
11. Solaris Centre, New South Promenade, FY4 1RW

Representations can be made electronically through the consultation portal <http://consult.blackpool.gov.uk/portal> or by email: development.plans@blackpool.gov.uk or by post: Development Plans and Projects, Blackpool Council, PO Box 17, Corporation Street, FY1 1LZ

The deadline for representations is 9am Monday 19th July, 2010

Example letter

E mail: graham.page@blackpool.gov.uk

Enquiries to: Mr. Page

7th May 2010

Direct line: (01253) 476241

Dear Sir/ Madam,

BLACKPOOL CORE STRATEGY PREFERRED OPTION

Your views are invited on the Blackpool Core Strategy Preferred Option document which has been approved by the Council for public consultation. It sets out the Council's proposed new statutory planning policy framework to help deliver fundamental physical, economic and social change and secure Blackpool a prosperous future.

The overall focus of the document is on Blackpool's regeneration. It sets out a balanced approach to the future development of homes and jobs, and seeks to address the realities of past decline by promoting a 21st century resort and town centre offer. It provides for the regeneration of the town centre, resort core and inner area neighbourhoods, and for supporting growth to support the development of a balanced, healthier and greener Blackpool.

Consultation commences Monday, 10th May and continues until 19th July 2010

The document will be available to view throughout the consultation period during normal opening hours at:

- Customer First, Municipal Buildings, Corporation Street
- All libraries in the Borough

You can also view and download the Core Strategy Preferred Option, supporting documents and "**Comments Form**" online on the Council's website at:

<http://www.blackpool.gov.uk/corestrategy2010>

This is your opportunity to comment (using the 'Comments Form' provided) on the issues it raises for Blackpool.

Please let us know your views. If you have any questions about the Core Strategy Preferred Option, you can contact, e-mail or telephone me at the address above.

Yours Sincerely,

G Page

Graham Page (Core Strategy Manager)

Please Let Us Know Your Views

It is essential the views of Blackpool's residents, businesses, organisations and all interested parties are made known to help us together to shape Blackpool's future development.

There are two main ways in which you can comment on the Council's Core Strategy Preferred Option:

1. Use the Council's on-line consultation portal by visiting the following website:

<http://consult.blackpool.gov.uk/portal>

2. You can send copies of the "Comments Form" by e-mail to:

development.plans@blackpool.gov.uk

or by post to the address below:

**Planning Department, Development Plans Team,
Blackpool Council, PO Box 17,
Corporation Street, Blackpool FY1 1LZ.**

(Copies of the "Comments Form" are available on-line on the Council's Planning website, from the Council's main offices, and from all libraries across the Borough)

Email sent to all on the Core Strategy Consultation database

Dear Sir/Madam

Core Strategy Preferred Option will be available for you to view and comment between the following dates:

Start date: 10/05/10 09:00

End date: 19/07/10 16:55

Please select the following link to view this event:

http://consult.blackpool.gov.uk/portal/core_strategy_preferred_option

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Kids Stuff
Keeping young people entertained should be child's play this summer thanks to the new Kids Stuff guide.

Published by Blackpool and Wyre Borough Councils, the free booklet is packed with details of local events and activities for all ages throughout both areas.

Copies are available from a number of community venues,

[more news items](#)

Blackpool Core Strategy Consultation



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- Blackpool Coastal Housing
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- R U Bothered Website
- Help4me Information site
- Statistics
- Blackpool Unlimited.com
- Blackpool FSD
- Planned Highway Works 2010
- Rolling Registration Form
- Sport Blackpool

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Blackpool Council
Customer First Centre
Municipal Building
Corporation Street
Blackpool
FY1 1NF

View map

Tel: (01253) 477477

Customer First Centre
Monday to Friday 8am-5.30pm
Saturday 9am-2pm

Customer First Telephone Line
8am-6pm Monday to Friday
Saturday 9am-2pm



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Blackpool Core Strategy

Blackpool Council is preparing the Core Strategy – which seeks to provide a planning framework to secure real social, physical and economic change for a prosperous and healthier Blackpool.

The **Core Strategy Preferred Option** has been approved by the Council for public consultation and sets out the Council's strategic development proposals to deliver the Council's vision for Blackpool in 2026. The Core Strategy includes:

- Promoting a 21st century resort and town centre offer
- The regeneration of the resort neighbourhoods
- A higher quality and more focused holiday accommodation sector
- Supporting growth at Marton Moss to enhance housing quality and choice
- A range of other supporting housing, social, economic and community policies to secure a prosperous, healthier and greener Blackpool.

Where to view the Core Strategy

We are keen to hear your views on the Blackpool Core Strategy Preferred Option. The period for making comments on the document is:

Public consultation: 10th May 2010 to 19th July 2010.

The Core Strategy Preferred Option together with accompanying reports can be viewed from the links below. The Core Strategy Preferred Option is also available for inspection free of charge from the following locations:

1. Main reception, Blackpool Council Municipal Buildings, Corporation Street, Blackpool.
2. Blackpool Enterprise Centre, Lytham Road, FY4 1EW
3. Solaris Centre, New South Promenade, FY4 1RW
4. Blackpool Central Library
5. All branch libraries in the borough during normal opening hours.

How to Comment

It is important the views of Blackpool's residents, businesses, organisations and other interests are made known to us to help us together to shape Blackpool's future development. There are 3 main ways by which you can choose to make comments on the Council's Core Strategy Preferred Option:

1. Make comments directly on the Council's on-line consultation version of the document using [this link](#)
2. Downloading and completing a copy of the "Comments Form" from [this link](#)
3. Using the Comments Form available direct from Council Offices and libraries.

What Happens Next

Following consideration of all comments on the Preferred Option, the Council will publish its Core Strategy Document which, after final consultation will be submitted to the Secretary of State. An independently appointed Inspector will then examine the Core Strategy, whose recommendations will be binding on the Council and incorporated into the Adopted Blackpool Core Strategy for the future development of Blackpool to 2026.

DOCUMENTS AVAILABLE – TO VIEW ON LINE

- o [The Core Strategy Preferred Option](#)

and supporting documents:

- o [Core Strategy Issues and Options June 2008](#)
- o [Reports to Council on Issues and Options \(February, March and July 2009\)](#)

Related Information

- Service Information
- FAQs
- Publications
- Area Action Plans
- Blackpool Core Strategy
- Holiday Accommodation SPD
- M55 Hub
- New Homes from Old Places

Contact Details

PO Box 17
Municipal Buildings
Corporation Street
Blackpool
FY1 1LZ

Email: [Click to email](#)
Tel: 01253 476240
Fax: 01253 476201

9am to 5pm Monday to Thursday and 9am to 4.30pm on Friday

- [Reports to Council on issues and options for coastal marsh and sea level](#)
- [Sustainability Appraisal of Blackpool Core Strategy](#)
- [Sustainability Appraisal of Blackpool Core Strategy - Final](#)
- [Sustainability Appraisal Appendices of Blackpool Core Strategy](#)
- [Sustainability Appraisal Non Technical Summary of Blackpool Core Strategy - Final](#)
- [Habitat Regulations Scoping Report](#)
- [Equality Impact Assessment](#)
- [Core Strategy Exhibition Boards](#)
- [Core Strategy Questionnaire](#)
- [Marton Moss Exhibition Boards](#)
- [Marton Moss Questionnaire](#)

Evidence Base

The Blackpool Core Strategy is also informed by a comprehensive "**Evidence Base**" comprising a number of detailed assessments of housing, employment, environment and other aspects of the current health and character of the Fylde Coast Sub-Region, along with more specific studies focused on Blackpool itself.

Details of the various reports completed to date are available to view using [this link](#)

Other Planning Documents

The Core Strategy is being prepared as the Council's lead planning document setting out the Council's draft strategic policies and development proposals to deliver the Council's vision for Blackpool in 2026. It also lays the foundation for more detailed policy development in other supporting development plan documents, which can be viewed using these links

- [Holiday Accommodation Supplementary Planning Document](#)
- [New Homes from Old Places Supplementary Planning Document](#)

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Have your say on the future of Blackpool



What is the Core Strategy?

When you think of 'the future' of the resort what do you see? Blackpool Council wants to know if your vision is the same as the one it has. Public consultation has begun on the Core Strategy Preferred Option, the Council's new plan for Blackpool up to 2026.

The document sets out the Council's plans to secure a more prosperous and healthy Blackpool by addressing the realities of past decline. The plan's focus is overwhelmingly on inner area regeneration, but also includes supporting growth.

Two big local issues are dealt with as part of the plan, namely the proposed changes to the holiday areas and the future of Marton Moss.

Much has and is being done in the resort and town centre through key projects like St Johns, the Promenade Headlands, the Tramway, and the recent acquisition of the Tower and Winter Gardens but it is crucial Blackpool also gets to grips with the wider need for change across the inner area neighbourhoods and resort areas if the town is to move forward.

The Council's new plan accordingly sets out further proposals for the town centre but a key issue is its proposals for a remodelling of the holiday areas to reflect today's Blackpool holiday market.

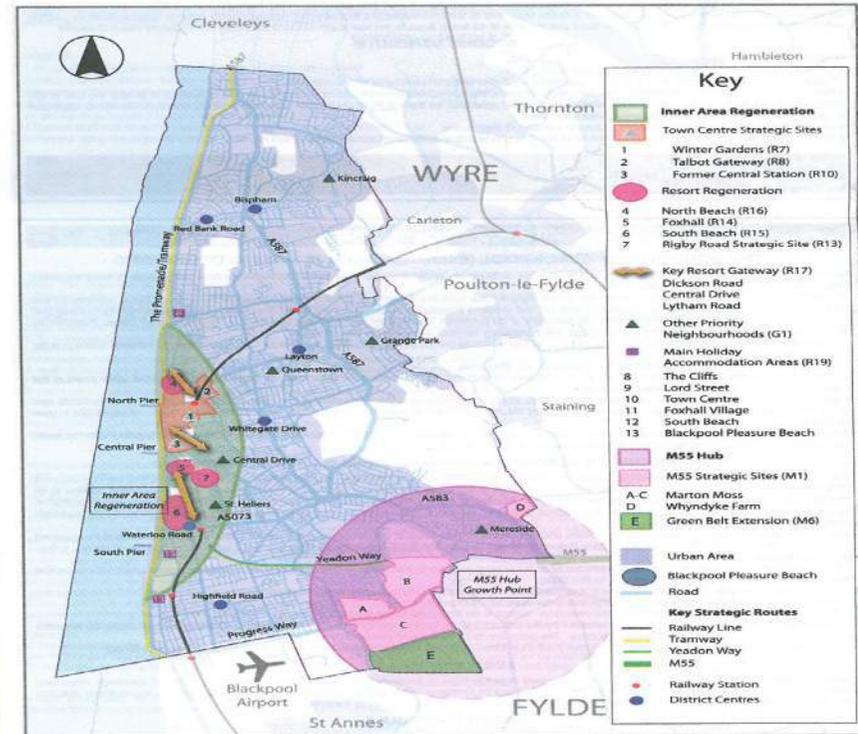
It sets out to create the conditions where

the businesses supplying the high level of quality accommodation can prosper alongside decent, fit for purpose, residential accommodation instead of the current over supply of poor quality hotels, sub standard rental accommodation and low quality HMOs.

The proposed development focused on Marton Moss will help meet the identified housing growth needs of Blackpool and seeks to provide a wide range of new housing close to the M55 gateway to Blackpool within a strong landscaped setting. It will give residents increased housing choice and allow developer contribution to help fix the inner areas of the town.

Blackpool will not secure a brighter future without facing some difficult challenges. Unless positive steps are taken to support the delivery of wider change across Blackpool's inner areas and on the edge of Blackpool, the transformation that is needed to promote a new and better 21st century Blackpool will not happen. We really want to hear your comments and so I would encourage Blackpool residents and businesses to participate in the consultation.

Public consultation will continue on the Blackpool Core Strategy Preferred Option until 19th July and the Council is keen to know residents views.



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Key issues				
Town Centre <ul style="list-style-type: none"> Main centre at the heart of the Fylde Coast High quality niche shopping Developing Blackpool's café culture Attractive public spaces Enhancement of Winter Gardens New Promenade Leisure frontage 	Resort Renaissance <ul style="list-style-type: none"> Unique & distinctive Blackpool offer Promoting conferences, events and festivals Exploiting a rich heritage Major new landmark attractions Enhance Foxhall and other resort neighbourhoods Improve key Central Drive, Lytham Road and Dickson Road gateways 	M55Hub <ul style="list-style-type: none"> 2,700 new homes on lands at Marton Moss New neighbourhood and community facilities Strongly landscaped setting Improved connections and transport links 	Holiday Accommodation <ul style="list-style-type: none"> Uplift quality A smaller more stable and successful holiday sector Protect key promenade hotels and frontages Six main holiday accommodation areas 	Healthy and Greener Blackpool <ul style="list-style-type: none"> More balanced mix of housing Improving local health, education and community facilities Protecting and enhancing green space Sustainable design and energy

How can I have my say?

It is essential the views of Blackpool's residents, businesses, organisations and all interested parties are made known to help

us together to shape Blackpool's future development. There are two main ways in which you can comment on the Council's

Core Strategy Preferred Option: 1. Use the Council's on-line consultation portal by visiting the following website:

<http://consult.blackpool.gov.uk/portal>
2. You can also view the Core Strategy Preferred Option at the

main council offices, at all local libraries and online at www.blackpool.gov.uk/corestrategy2010



BLACKPOOL CORE STRATEGY PREFERRED OPTION

What is a Core Strategy?

- A new type of plan focused on the big issues and difficult choices about Blackpool's future development to 2026.
- It will replace many key policies in the existing Blackpool Local Plan.
- It sets out policies for the future of the resort, town centre, housing and other development needs.

What other plans will there be?

- More detailed neighbourhood Plans for the Inner Resort Neighbourhoods and for Marton Moss/M55 Hub
- Supplementary Planning Documents including more detailed guidance on:
 - New Homes from Old Places – Residential & Conversion Design Guidance
 - Holiday Accommodation Areas

How have we reached this point?

Issues and Options Consultation – June 2008
This document highlighted the main issues in Blackpool and provided different OPTIONS for its future development.



Evidence Base Preparation – Ongoing
Detailed reports covering housing, retail, employment, economic, climate change and the natural environment.



Preferred Option – May-July 2010
This document is informed by an appraisal of the different options and provides overall strategic proposals and policies.

The Core Strategy includes:

- Promoting a 21st century resort and town centre offer
- The regeneration of the resort neighbourhoods
- A higher quality and more focused holiday accommodation sector
- Supporting growth at Marton Moss to enhance housing quality and choice



Blackpool Council
BUILDING A BETTER COMMUNITY FOR ALL

2 BLACKPOOL CORE STRATEGY PREFERRED OPTION

2010-2026

The Vision for Blackpool

"Blackpool will be the main business, cultural, retail and educational centre of the Fylde Coast, serving 350,000 local residents. It will be recognised as a unique, year round 21st century visitor experience, offering escapism and fun with high quality attractions, and state of the art conferencing facilities, accommodation and hospitality.

The New Blackpool will attract new visitors, businesses and residents, creating the market and conditions for a wider and improved housing offer, and for higher value employment and growth. It will have a stable and growing population, offering a full range of educational provision, giving its people the skills and aspirations to succeed.

New homes and jobs will be provided in sustainable locations to meet the community's needs and support regeneration. Neighbourhoods will be enhanced in appearance with good access to shopping, health, recreation, open space and other facilities to meet community needs. Inner Blackpool will be transformed into a place offering a mix of aspirational and affordable housing within mixed, attractive neighbourhoods, with access to quality local services.

Higher quality developments will promote pride in the town and provide focus within a visually attractive, safe urban environment. An integrated transport system will provide safe, healthy and easy access across Blackpool and the Fylde Coast. Areas of urban or natural quality throughout the New Blackpool will be conserved and enhanced."



Source: LDA Design



Source: LDA Design

What the plan aims to achieve

Sustainable regeneration, diversification and growth

- Encouraging physical, economic and social change.
- Regeneration, growth and development of homes, jobs, supporting facilities and services.
- Well designed places and spaces
- Promoting integrated transport, travel, and communications

Maximising regeneration

- Promoting and encouraging investment into Blackpool.
- Creating a successful and vibrant town centre.
- Restructuring and re-inventing a 21st century resort offer.
- Remodelling the inner areas to provide new residential development and better quality housing.

A Balanced Healthier and Greener Blackpool:

- Securing a better quality of life.
- New services and facilities.
- Providing a choice of quality homes.
- Conserving and enhancing the natural and built environment
- Meeting sports and recreational needs.
- Addressing climate change issues and embracing sustainable energy measures

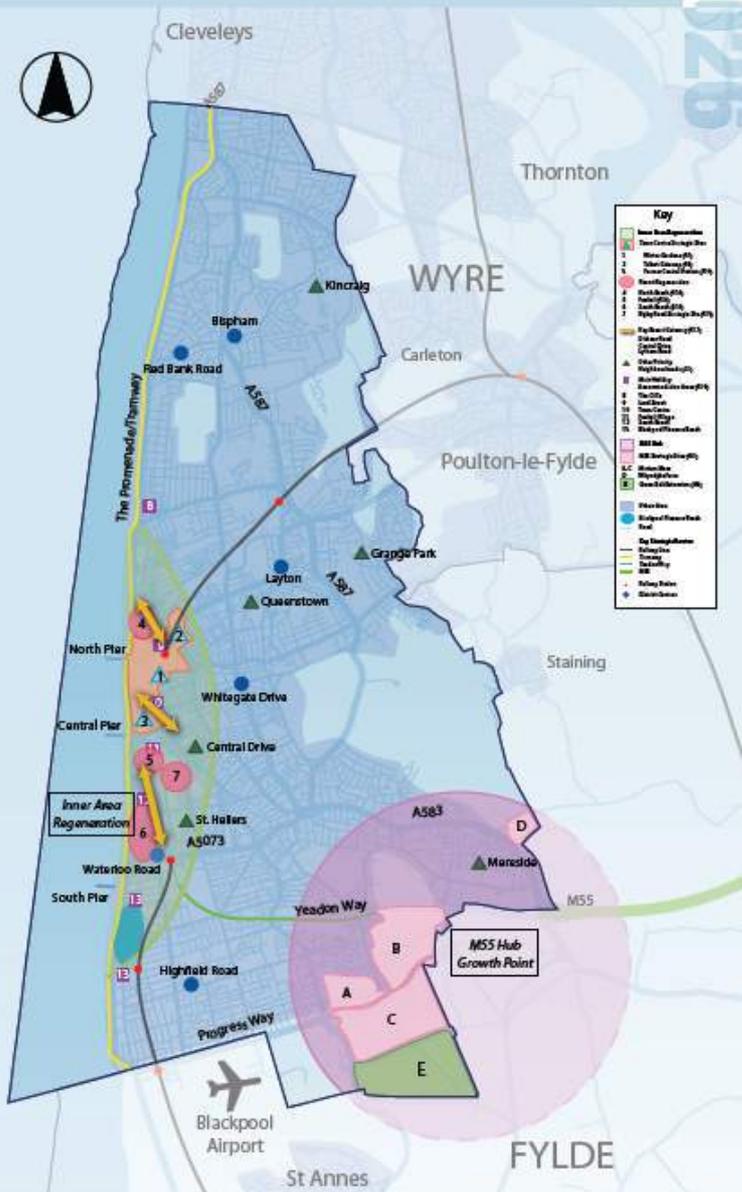
Providing supporting growth

- Comprehensive regeneration on the edge of Blackpool, to create better housing and employment markets.
- Promoting distinctive strong and vibrant new neighbourhood communities.
- Sustainable infrastructure.



BLACKPOOL CORE STRATEGY PREFERRED OPTION

2010-2026



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BLACKPOOL CORE STRATEGY PREFERRED OPTION

2010-2025

Town Centre

- Main centre at the heart of the Fylde Coast
- High quality niche shopping
- Developing Blackpool's café culture
- Attractive public spaces
- Enhancement of Winter Gardens
- New Promenade Leisure frontage



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Resort Renaissance

- Unique and distinctive Blackpool offer
- Promoting conferences, events and festivals
- Exploiting a rich heritage
- Major new landmark attractions
- Enhance Foxhall and other resort neighbourhoods
- Improve key Central Drive, Lytham Road and Dickson Road gateways



Tower Headland (Source: LDA Design)



Key
 ■ Neighbourhood Plans
 ■ Gateway Improvement Area
 ■ Rigby Road Development Site
 ● Headland



Talbot Gateway (Source: MUSE)



BLACKPOOL CORE STRATEGY PREFERRED OPTION

2010-2025

M55 Hub/Marton Moss

The proposed development of 2700 new homes in a landscaped setting (potentially also including lands in Fylde) would provide:

- A focus for growth and development
- A wider mix of new family housing
- New neighbourhood and community facilities
- Strongly landscaped setting
- Improved connections and transport links
- Sustainable technologies to save energy, reduce waste and re-use water



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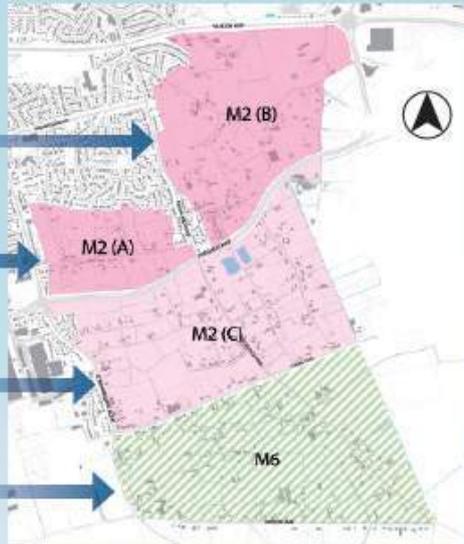
Phased release of sites at Marton Moss

Development after 2016

First Phase development

Development Review Post 2016

Proposed Extension to Green Belt



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Images for illustrative purposes only (Source: David Lock Associates)



BLACKPOOL CORE STRATEGY PREFERRED OPTION

2010-2015

Holiday Accommodation

- A smaller more stable and successful holiday sector
- Uplift quality
- Protect key promenade hotels and frontages
- Six main holiday accommodation areas

Policy R18: The Promenade

Safeguards a number of Blackpool's **Key Promenade Hotel Frontages**, with the largest grouping on the North Shore Cliffs.

Elsewhere on the **Main Holiday Accommodation Promenade Frontage**, it safeguards the amount of holiday accommodation, but promotes high quality redevelopment and a new mixed use seafront holiday and residential offer.

Policy R19: Main Holiday Accommodation Areas

Safeguards and promotes improved high standard accommodation in 6 new **Main Holiday Areas** off the Promenade:

1. The Cliffs
2. Lord Street
3. Town Centre
4. Foxhall Village
5. South Beach
6. Pleasure Beach



BLACKPOOL CORE STRATEGY PREFERRED OPTION

A Balanced and Greener Blackpool

- More balanced mix of housing
- Improving local health, education and community facilities
- Protecting and enhancing green space
- Sustainable design and energy efficiency



Over £140 million funding creating Blackpool schools for the 21st century.



New Primary Care Centres
Three new purpose-built Primary Care Centres will provide patients with modern health services



Blackpool's newest park, Bancroft Park



Sustainable energy technologies will be encouraged in new developments

What happens now?

We want **YOUR** views.
The Council will consider all the comments received and prepare a Consultation Statement which will feed into the Submission Plan.



HOLIDAY ACCOMMODATION

DRAFT SUPPLEMENTARY PLANNING DOCUMENT (SPD)

2010-2026

What is proposed?

The Core Strategy Preferred Option proposes to replace the existing widely drawn resort neighbourhoods with smaller more concentrated holiday accommodation areas, and wider mixed use neighbourhoods.

The Holiday Accommodation consultation document applies the Core Strategy policy and identifies the proposed boundaries of the main holiday accommodation areas:



Lord Street



Metropole



Source: www.bigbluehotel.com

The Need for Change

Current Blackpool Local Plan policy seeks to prevent the loss of holiday accommodation in the widely drawn resort neighbourhoods.

The Fylde Coast Visitor Accommodation Study (2009) identified an over-supply of 14,000 bedspaces (approx. 400 holiday accommodation premises) in the resort.

The new Core Strategy seeks to provide a policy framework with the dual focus of safeguarding key holiday accommodation areas and promenade hotel frontages, and creating balanced mixed neighbourhoods.

Key Aims

- Support an improvement in quality and reduction in quantity of holiday accommodation which consolidates provision around the strongest clusters.
- Maintain the Promenade as the 'shop window' to the resort, offering a range of high quality visitor accommodation.
- Provide a focused supporting high quality holiday accommodation offer in six defined off-Promenade areas.
- To encourage mixed neighbourhoods outside of the main holiday accommodation areas. Complementing this will be a New Homes from Old Places guidance setting out Council standards design change of use.



York Street



Reshaping Blackpool's Holiday Accommodation Offer

How the proposed areas were chosen...

The six main holiday accommodation areas were determined in accordance with ten general criteria.

Strategic Evidence	<ul style="list-style-type: none"> • Needed to reduce the overly offered areas • To reduce the amount and times for individual areas • Evidence from the Fylde Coast Visitor Accommodation Study
Neighbourhood Evidence	<ul style="list-style-type: none"> • Patterns of accreditation • Detailed Land-use and other survey data
Local Character	<ul style="list-style-type: none"> • The location, scale and appearance of properties • Evidence and concentration of holiday accommodation use
The Future	<ul style="list-style-type: none"> • Viability • Market Attractiveness • Possible Alternative Future?



HOLIDAY ACCOMMODATION

DRAFT SUPPLEMENTARY PLANNING DOCUMENT (SPD)

2010-20

The Changing Holiday Accommodation Areas and Wider Neighbourhoods

Core Strategy Policy R18: The Promenade

 Safeguards a number of Blackpool's **Key Promenade Hotel Frontages**, with the largest grouping on the North Shore Cliffs.



Imperial Hotel

 Elsewhere on the **Main Holiday Accommodation Promenade Frontage** it safeguards the quantum of holiday accommodation, but promotes high quality redevelopment and a new mixed use seafront holiday and residential offer.



Norbreck Castle Hotel

Core Strategy Policy R19: Main Holiday Accommodation Areas

 Safeguards and promotes improved high standard accommodation in 6 new main holiday areas off the Promenade.

1. The Cliffs
2. Lord Street
3. Town Centre
4. Foxhall
5. South Beach
6. Pleasure Beach

Core Strategy Policy R20: Mixed Neighbourhoods

Outside the main holiday accommodation areas the focus is on managing change and restoring confidence via the remodelling of these areas to create balanced residential neighbourhoods.



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HOLIDAY ACCOMMODATION

DRAFT SUPPLEMENTARY PLANNING DOCUMENT (SPD)

2010-2025

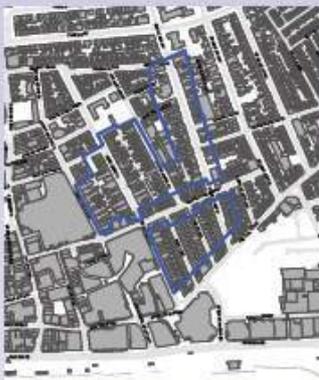
1. Norbreck, Bispham and North Shore Cliffs



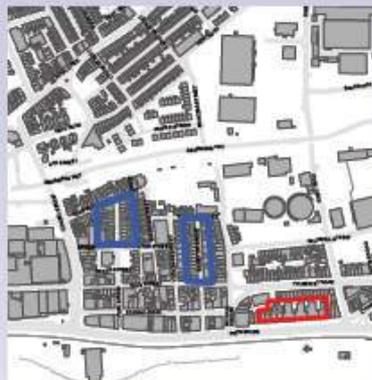
2. North of the Town Centre inc. Lord Street



3. South of Town Centre



4. Foxhall and Central Promenade



5. South Beach



6. Pleasure Beach



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HOLIDAY ACCOMMODATION

DRAFT SUPPLEMENTARY PLANNING DOCUMENT (SPD)

2010-2026

Frequently Asked Questions

MAIN HOLIDAY ACCOMMODATION AREAS

What happens if I am within a main holiday accommodation area?

Q: I am within a proposed area and want to convert my hotel or guesthouse to residential use, can I do this?

A: The loss of holiday accommodation within the six proposed new areas will generally not be permitted. Changes would only be permitted in exceptional circumstances.

Q: I am within a proposed holiday accommodation area but not currently accredited, will I be supported?

A: The Council will continue to support all efforts to provide improved holiday accommodation and those seeking to achieve accreditation whether they are inside or outside the proposed areas.

Q: My property is currently in residential use, can this be converted to holiday accommodation use?

A: Yes. New or improved holiday accommodation of a high standard will be promoted in these areas. However where properties are already in residential use, such uses can continue, with the emphasis again on high quality standards of accommodation.

What happens if I am in the 'mixed neighbourhoods'?

Q: Why is my street outside the proposed areas?

A: All the streets in the resort neighbourhoods were assessed against ten criteria. From this the strongest clusters of holiday accommodation were identified, and formed the boundaries of the proposed areas. If you do not agree with these boundaries, please clearly outline your reasons or alternatives on a 'Comments Form' and return to us.

Q: If my business is outside the proposed main holiday accommodation areas, can I continue to operate?

A: Yes, being outside the area enables greater flexibility for property owners to apply to convert into residential use. Owners will not need to convert holiday accommodation into residential use unless they want to.

Q: I have achieved accreditation but my property is outside the proposed areas. How does this change affect me?

A: The Council will continue to support accredited holiday accommodation whether they are inside or outside the proposed areas.

Q: If I am outside the proposed areas and want to convert my hotel or guesthouse to residential use, how do I go about this?

A: Submit a planning application which meets the Council's guidance on relevant floor space, quality and amenity standards to be achieved in residential conversions and sub-divisions. (The New Homes from Old Places guidance is proposing to uplift the required standards.)

MIXED NEIGHBOURHOODS

Other FAQs

Q: Will property values of holiday accommodation outside the proposed main holiday accommodation areas be affected?

A: Property values change in line with the fortunes of the national economy as well as local changes in the attractiveness of Blackpool as a place to visit and live. The new policy framework is supportive of improved standards and high quality accommodation across the holiday areas, whether in holiday accommodation or residential use and should support properties in the areas.

Q: What action will be taken on current, or any future, HMOs?

A: The Council will actively monitor and enforce against holiday accommodation which converts unlawfully to HMOs.

Q: What funding will be available for holiday accommodation properties to achieve accreditation?

A: There is no certainty at this time what funding will be available. Like so much else it depends on Government policy changes which make monies available or not. The Council will continue to support any scheme to encourage improved standards.

Q: Will HMOs be permitted outside the proposed areas?

A: No. Planning permission must be sought to convert a hotel, guesthouse or holiday flats in to self-contained residential use.



Blackpool Core Strategy

HOLIDAY ACCOMMODATION

DRAFT SUPPLEMENTARY PLANNING DOCUMENT (SPD)

Creating Quality Mixed Neighbourhoods

The Council has developed a comprehensive approach to tackling poor quality housing, this includes:

- Tackling HMOs through strict planning and housing enforcement
- The development of new residential and amenity space standards
- Demanding higher standards of residential and amenity conversion through the 'New Homes from Old Places' guide

'New Homes from Old Places'

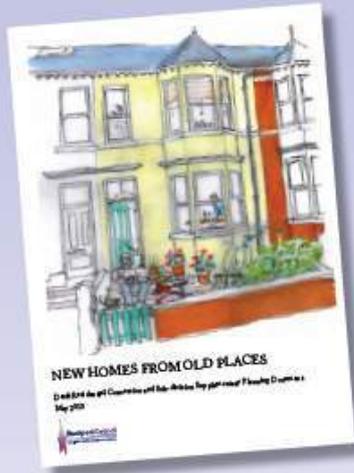
Draft Residential Conversion and Sub-division Supplementary Planning Document

Key Aims

- Provide updated design guidance on relevant floor space and amenity standards to be achieved in residential conversions and sub-divisions
- Improve the character and quality of existing and emerging residential neighbourhoods.
- Prevent former guest-houses and similar accommodation falling into use as Houses of Multiple Occupancy (HMOs) while providing a sustainable conversion route
- Address the over-supply of small fatted dwellings, particularly in the inner resort neighbourhoods
- Ensure that sustainable development principles are considered during the design and construction of residential conversions and sub-divisions



Concept illustration only



The document includes specific guidance for existing owners who wish to cease trading but continue using the property as their main home.

Once adopted, the document will act as a detailed guide for applicants and agents on the preparation of high-quality, sustainable designs for planning applications for residential conversion and sub-division across Blackpool.

What Happens Next?

The Council will consider all comments received and will prepare a Consultation Statement which will include the Council's response to the issues raised during consultation, and prepare a revised version of the holiday accommodation document.



MARTON MOSS/ M55 HUB

2010-2026

Why?

A key part of the Plan's overall vision is to create the market and conditions for a wider and improved housing offer, and for higher value employment growth.

The Preferred Option was approved by the Council following earlier consultation on the Issues and Options document, and overwhelmingly focuses on Blackpool's regeneration:

- Promoting a 21st century resort and town centre offer.
- The regeneration of the resort neighbourhoods.
- A higher quality and more focused holiday accommodation sector.

But also includes:

- Supporting Growth at Marton Moss to enhance housing quality and choice. This proposal will:
 - Provide quality new homes, including much needed family housing.
 - Meet development needs in a way which changes, but still respects the essential character of the area.
 - Strengthen the countryside character of the remaining Moss, and extend the Green Belt south of School Road.

Providing supporting growth recognises that:

- Blackpool's housing market has become increasingly slanted towards a lower quality offer, with a limited range of choice compared to more prosperous towns and neighbouring areas.
- Supporting growth over many years has been important in maintaining choice, stabilising population, and supporting the local economy.
- In the last ten years Blackpool's population has declined, making it harder to promote and encourage investment into the town and its centre.
- Without some supporting growth, these issues will not be addressed.



2 REGIONAL/ NATIONAL HOUSING NEEDS

2010-2025

Nationally, there is wide recognition of the shortage of new homes - particularly new family homes – a situation which has been made much worse in the short term by the country's economic problems and their impact on the housing market.

Recent Government policy has focused on maximizing brownfield redevelopment, but recognises that the scale of new housing required cannot be met without some Greenfield development. The emphasis is increasingly on ensuring "sustainable" development locations in well connected, vibrant and properly planned communities.

Regional Plans propose increased housing numbers in many areas, including the North West, concentrating development in and around the main towns and cities where the existing facilities and infrastructure can best cater for growth.

The Need for New Homes in Blackpool North West Plan (2008)

8,000 new dwellings in Blackpool

BUT the new Government has ended
Regional Housing Targets

Meeting part of local and wider needs by developing on part of Marton Moss in Blackpool would be on greenfield land.

The Moss has no special landscape policy protection and is well located for development on the edge of the existing urban area, close to the motorway, yet only 2 miles from Blackpool Town centre.



The Change in Government has been followed by an early announcement of an end to the need to meet regional housing requirements, but the national need for new housing remains.

Local authorities will still be encouraged to increase levels of housing development but, critically, more emphasis will be placed on local councils to themselves determine how best to meet their housing needs.

Blackpool's housing needs remain. This public consultation is crucial to inform the Council of the views of local residents – both on the Moss and across Blackpool – together with the views of wider development, environment and other interest groups.

WHAT THE BLACKPOOL CORE STRATEGY SAYS...

2010-2026

Housing Need: Blackpool Strategic Housing Sites 2010-2026

To identify sites and opportunities for the development of 6,800 new homes to meet Blackpool's need between 2010 and 2026:

Central Blackpool inner area development sites: (through regeneration/ housing intervention/ market uplift)	2,000
Other new housing development sites elsewhere in the urban area including:	1,700
<ul style="list-style-type: none"> • Talbot Gateway • The Rigby Road College site • Former Devonshire Road Hospital • Leys Nursery • Ryscar Way 	
Allowance for conversions of existing properties	1,000
Strategic Development sites at M55 Hub/ Marton Moss	2,700
Total	7,400 dwellings
Completed dwellings 2003-2010	2,000 dwellings
Sites under construction or with planning permission at 1st April 2010	1,400 dwellings
Overall Total	10,800 dwellings

The above figures accord with Blackpool's Regional Housing Requirement – but the recent change in Government policy places the emphasis on Councils to determine how best to meet local housing needs.



The scale of new housing that can be met by inner area regeneration is limited by the level of public funding available to support the scale of interventions required. There is no reasonable medium term prospect of implementation of a scale of development beyond that currently proposed in the Preferred Option.



WHAT THE BLACKPOOL CORE STRATEGY SAYS...

THE WIDER M55 HUB MASTERPLAN

The M55 Hub Masterplan was jointly commissioned by Blackpool and Fylde Councils to help determine the scale and direction of potential development on the edge of Blackpool in both local authority areas.

The M55 Hub 'Prospectus for Development' was produced in July 2009, reported and made publicly available by both councils.

Fylde Council's position is that it represents one option – and the Study is helping inform their decision and choices on wider lands across Fylde. No decisions have been made by Fylde Council.

Blackpool Council's position, to date, has been to support the concept of wider development of the M55 Hub to help meet development needs.

Their proposed development represents a logical and deliverable extension of the existing Blackpool urban area. Close integration will remain essential whatever future decisions are taken by Fylde Council – whether for substantial or very limited development on its side of the boundary.



M55 Hub Vision

The M55 Hub would help meet the Fylde Sub-Region's need for new homes and jobs in a landscaped setting on the edge of Blackpool. It would provide a focus for growth and environmental enhancement, ensuring development pressures are accommodated in a way which safeguards the wider countryside and respects the separate identities of Blackpool and Fylde.

The M55 Hub would be a combination of sustainable neighbourhoods clustered around the main gateway into Blackpool and the Fylde Coast. Integrated with the Fylde Coast community, it would provide many direct benefits, not least new open spaces and parks, schools, jobs, homes and community facilities.



WHAT THE BLACKPOOL CORE STRATEGY SAYS...

2010-2025

Lands at Marton Moss in Blackpool

Policy M1 proposes to allocated lands to provide for around 2,700 new homes at Marton Moss in Blackpool.

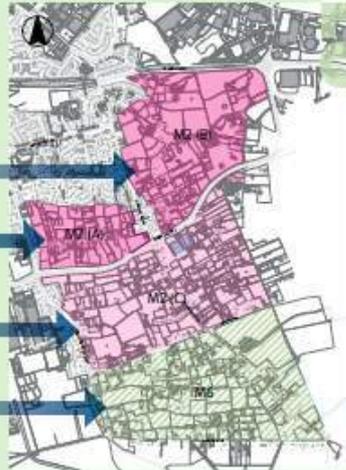
Phased release of sites at Marton Moss

Development after 2016

First Phase development

Development Review Post 2021

Proposed Extension to Green Belt



Policy M2 sets out:

- First priority for new development up to 2016 is the lands at Moss House Road, as included in the recent planning application.
- No further development will be permitted of other sites after 2016 unless part of a comprehensive wider strategy based on a full assessment of the future scale, nature, phasing and impacts of development of the wider M55 as a whole.

Future development proposals would need to be progressed through a more detailed plan for the lands in Blackpool in accordance with ongoing reviews of future needs.

Policy M6 proposes the extension of Green Belt in Blackpool, south of School Road-in recognition of the growing development pressures, the need to prevent the coalescence of Blackpool and St Annes.

Whyndyke Farm

Policy M7 allocates lands in Blackpool south of Mythop Road for development for mixed commercial / residential use.

This largely reflects the current proposals for a new mental health hospital in a landscaped setting.

The vast majority of the wider lands at Whyndyke Farm are within Fylde. The extended frontage of Preston New Road is in Blackpool. Its longer term development could form part of a new community neighbourhood on the edge of Blackpool.



Information Leaflets

We want to know your views:

It is essential the views of Blackpool's residents, businesses, organisations and all interested parties are made known to help us together to shape Blackpool's future development

There are 2 main ways in which you can comment on the Council's Core Strategy Preferred Option:

1. Use the Council's on-line consultation portal by visiting the following website:

<http://consult.blackpool.gov.uk/portal>

2. You can also view the Core Strategy Preferred Option at the main Council offices, at all local libraries, and on-line at:

<http://www.blackpool.gov.uk/corestrategy2010>

This is only an outline summary.

You are invited to refer to the full Core Strategy Preferred Option document, make use of the "Comments Forms" and let us know your views

Have *your say* on
the future of
Blackpool

Blackpool Core Strategy

Preferred Option Consultation

10th May - 19th July 2010

Blackpool Council is preparing the Core Strategy - which seeks to provide a planning framework to secure real social, physical and economic change for a more prosperous and healthier Blackpool. The Core Strategy Preferred Option sets out for public consultation the Council's strategic development proposals to deliver the Council's Vision for Blackpool in 2026.

Blackpool Core Strategy



Preferred Option



April 2010



Building a better community for all

The Core Strategy includes:

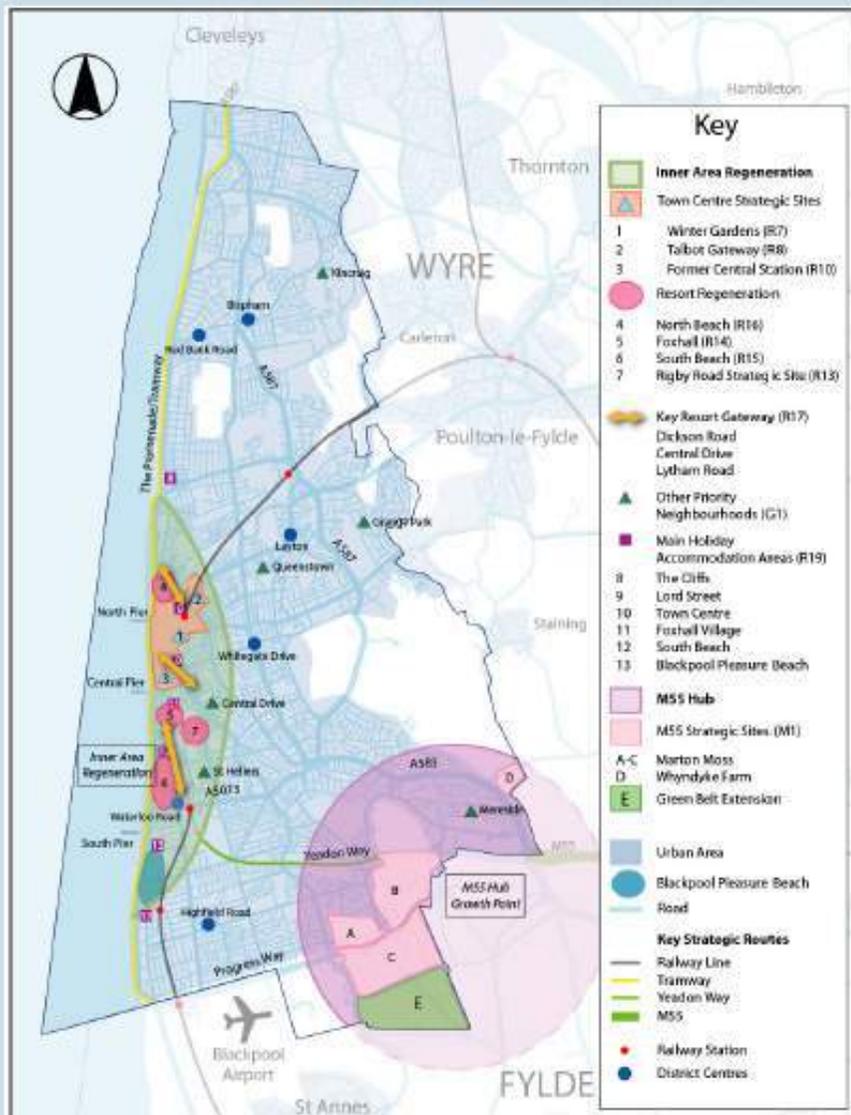
- o *Promoting a 21st century resort and town centre offer*
- o *The regeneration of the resort neighbourhoods*
- o *A higher quality and more focused holiday accommodation sector*
- o *Supporting growth at Marton moss to enhance housing quality and choice*



Please let us know your views



Key Diagram



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Town Centre

- Main centre at the heart of the Fylde Coast
- High quality niche shopping
- Developing Blackpool's café culture
- Attractive public spaces
- Enhancement of Winter Gardens
- New Promenade Leisure frontage

Resort Renaissance

- Unique and distinctive Blackpool offer
- Promoting conferences, events and festivals
- Exploiting a rich heritage
- Major new landmark attractions
- Enhance Foxhall and other resort neighbourhoods
- Improve key Central Drive, Lytham Road and Dickson Road gateways

M55 Hub

- 2,700 new homes on lands at Marton Moss
- New neighbourhood and community facilities
- Strongly landscaped setting
- Improved connections and transport links

Holiday Accommodation

- Uplift quality
- A smaller more stable and successful holiday sector
- Protect key promenade hotels and frontages
- Six main holiday accommodation areas

Healthy and Greener Blackpool

- More balanced mix of housing
- Improving local health, education and community facilities
- Protecting and enhancing green space
- Sustainable design and energy efficiency

For further information see the **Core Strategy Preferred Option**, available at:

www.blackpool.gov.uk/corestrategy2010

or view at the Customer First Centre and local libraries.

Other key issues: • Housing • Health • Education • Community Facilities • District Centres • Affordable Housing • Employment • Economic Diversification • Heritage • Landscape • Biodiversity • Climate Change • Transport • Retail • Mixed Neighbourhoods • Green Belt • Coast • Local Distinctiveness • Leisure • Infrastructure • Gateways • Quality

Frequently Asked Questions

Q: Why is my street outside the proposed areas?

A: All streets in the resort neighbourhoods were assessed. The strongest clusters of holiday accommodation were identified, and form the boundaries of the proposed areas. If you do not agree with these boundaries, please clearly outline your reasons or alternatives on a 'Comments Form' and return to us.

Q: I am within a proposed area and want to convert my hotel to residential use, can I do this?

A: The loss of holiday accommodation within the six proposed new areas will generally not be permitted. Changes would only be permitted in exceptional circumstances.

Q: My business is outside the proposed main holiday accommodation areas, can I continue to operate?

A: Yes, but being outside the area enables greater flexibility for property owners to change to residential use. Owners will not need to convert unless they want to.

Q: If I want to convert my hotel or to residential use, how do I go about this?

A: Submit a planning application which meets the Council's guidance on relevant floor space, quality and amenity standards to be achieved in residential conversions and sub-divisions. The *New Homes from Old Places* guidance is proposing to uplift the required standards.

Q: I have achieved accreditation but my property is outside the proposed areas. How does this affect me?

A: The Council will continue to support accredited holiday accommodation whether they are inside or outside the proposed areas.

Q: Will HMOs be permitted outside the proposed areas?

A: No. Planning permission must be for self-contained residential use.

Q: What action will be taken on current, or any future, HMOs?

A: The Council will actively monitor and enforce against holiday accommodation which converts unlawfully to HMOs.

We want to know your views:

It is essential the views of Blackpool's residents, businesses, organisations and all interested parties are made known to help us together to shape Blackpool's future development

There are 2 main ways in which you can comment on the Holiday Accommodation Supplementary Planning Document:

1. Use the Council's on-line consultation portal by visiting the following website:

<http://consult.blackpool.gov.uk/portal>

2. You can also view the Supplementary Planning Document at the main Council offices, at all local libraries, and on-line at:

<http://www.blackpool.gov.uk/corestrategy2010>

This is only an outline summary. You are invited to refer to the full Holiday Accommodation Draft Supplementary Planning Document, make use of the "Comments Forms" and let us know your views

Have *your say* on the future of
Blackpool
and the
Resort's Holiday Areas

Blackpool Core Strategy

Holiday Areas Consultation
24th May to 5th July 2010



Blackpool Council is preparing the Core Strategy to provide a new planning framework for a more prosperous and healthier Blackpool which includes:

- o Promoting a 21st century resort and town centre offer
- o The regeneration of the resort neighbourhoods
- o A more stable and successful holiday sector

Exhibition Dates

See and discuss the proposals at exhibitions in your area:

South Beach: 7th June 2010
St Peter's Church,
Lytham Road

Norbreck, Bispham and North Shore Cliffs: 21st June 2010
The Savoy Hotel, Queens Promenade

Pleasure Beach: 10th June 2010
Holy Trinity Church,
Dean Street

North of the Town Centre: 24th June 2010
Claremont First Steps Centre,
Dickson Road

Foxhall & Central Promenade: 14th June 2010
Blackpool Philharmonic Club,
Foxhall Road

South of Town Centre: 28th June 2010
St John's Conference Centre,
Cedar Square

All exhibitions run 2-8 pm

The Changing Holiday Accommodation Areas and Wider Neighbourhoods

Core Strategy Policy R18: The Promenade

- Safeguards a number of Blackpool's Key Promenade Hotel Frontages, with the largest grouping on the North Shore Cliffs.

- Elsewhere on the Main Holiday Accommodation Promenade Frontage it safeguards the quantum of holiday accommodation, but promotes high quality redevelopment and a new mixed use seafront holiday and residential offer.

Core Strategy Policy R19: Main Holiday Accommodation Areas

- Safeguards and promotes improved high standard accommodation in 6 new main holiday areas off the Promenade.

1. The Cliffs
2. Lord Street
3. Town Centre
4. Foxhall
5. South Beach
6. Pleasure Beach

Core Strategy Policy R20: Mixed Neighbourhoods

Outside the main holiday accommodation areas the focus is on managing change and restoring confidence via the remodelling of these areas to create balanced residential neighbourhoods.

Individual boundaries can be viewed at the exhibitions or in the Holiday Accommodation document.



Town Centre

- Main centre at the heart of the Fylde Coast
- High quality niche shopping
- Developing Blackpool's café culture
- Attractive public spaces
- Enhancement of Winter Gardens
- New Promenade Leisure frontage

Resort Renaissance

- Unique and distinctive Blackpool offer
- Promoting conferences, events and festivals
- Exploiting a rich heritage
- Major new landmark attractions
- Enhance Foxhall and other resort neighbourhoods
- Improve key Central Drive, Lytham Road and Dickson Road gateways

Holiday Accommodation

Draft Supplementary Planning Document (SPD)

Key Aims

- Support an improvement in quality and reduction in the number of holiday accommodation premises around the strongest clusters.
- Maintain the Promenade as the 'shop window' to the resort, offering a range of high quality visitor accommodation.
- Safeguard six further areas off the Promenade providing high quality holiday accommodation.
- To encourage wider mixed neighbourhoods outside the main holiday accommodation areas, with a *New Homes from Old Places* guidance setting out Council standards for change of use.



What is proposed?

To replace the existing widely drawn resort neighbourhoods with smaller more concentrated holiday accommodation areas, and wider mixed use neighbourhoods.

The Holiday Accommodation consultation document applies the Core Strategy policy and identifies the proposed boundaries of the main holiday accommodation areas.

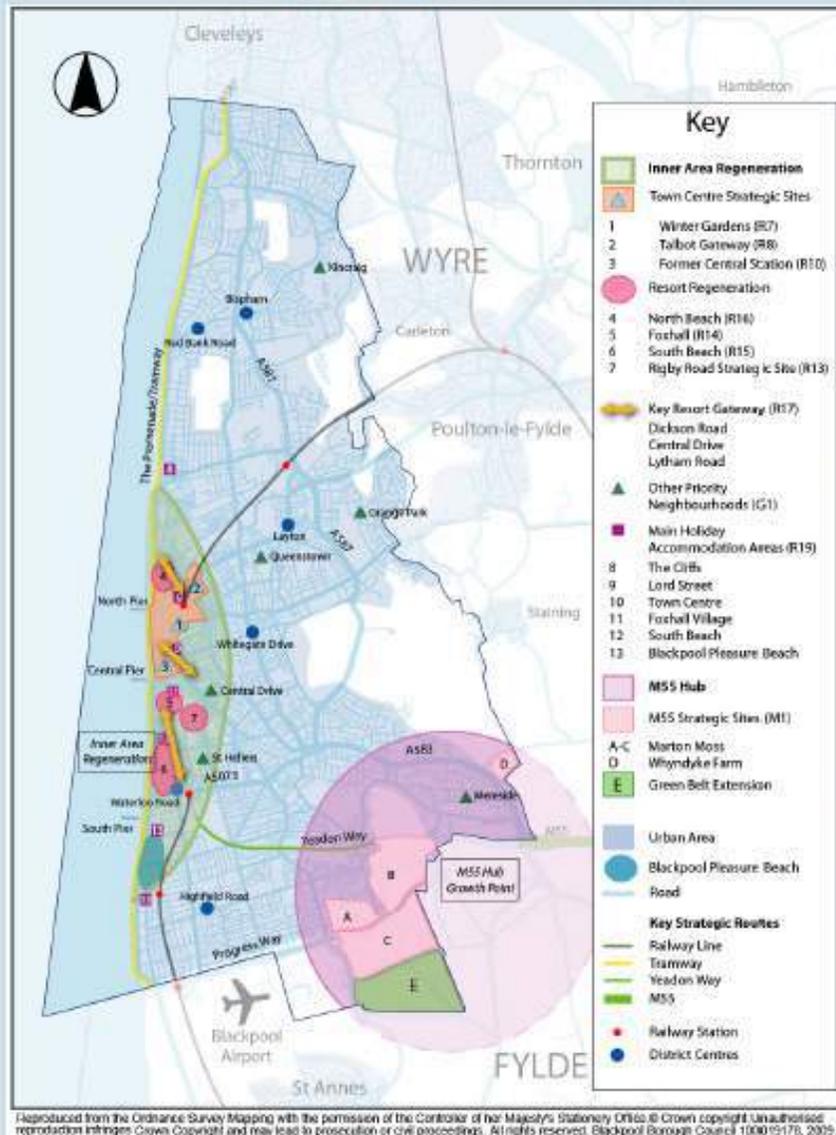
The Need for Change

Current Blackpool Local Plan policy seeks to prevent the loss of holiday accommodation in the widely drawn resort neighbourhoods.

The *Fylde Coast Visitor Accommodation Study (2009)* identified an over-supply of 14,000 bedspaces (approx. 400 holiday accommodation premises) in the resort.

The new Core Strategy seeks to provide a dual policy focus of safeguarding key holiday accommodation areas and promenade hotel frontages, and create balanced residential neighbourhoods.

Key Diagram



Town Centre

- The main centre of the Fylde Coast
- High quality niche shopping
- Developing Blackpool's café culture
- Enhancement Winter Gardens
- New Promenade Leisure frontage

Resort Renaissance

- Unique distinctive Blackpool - offer
- Exploiting a rich heritage
- Major new landmark attractions
- Enhance resort neighbourhoods and Central Drive & Lytham Road gateways

Healthy and Greener Blackpool

- More balanced mix of housing
- Improving local health, education and community facilities
- Protect and enhance green space
- Sustainable design and energy efficiency

Holiday Accommodation

- Uplift quality
- A smaller more stable and successful holiday sector
- Protect key promenade hotel frontages
- Six main holiday accommodation areas

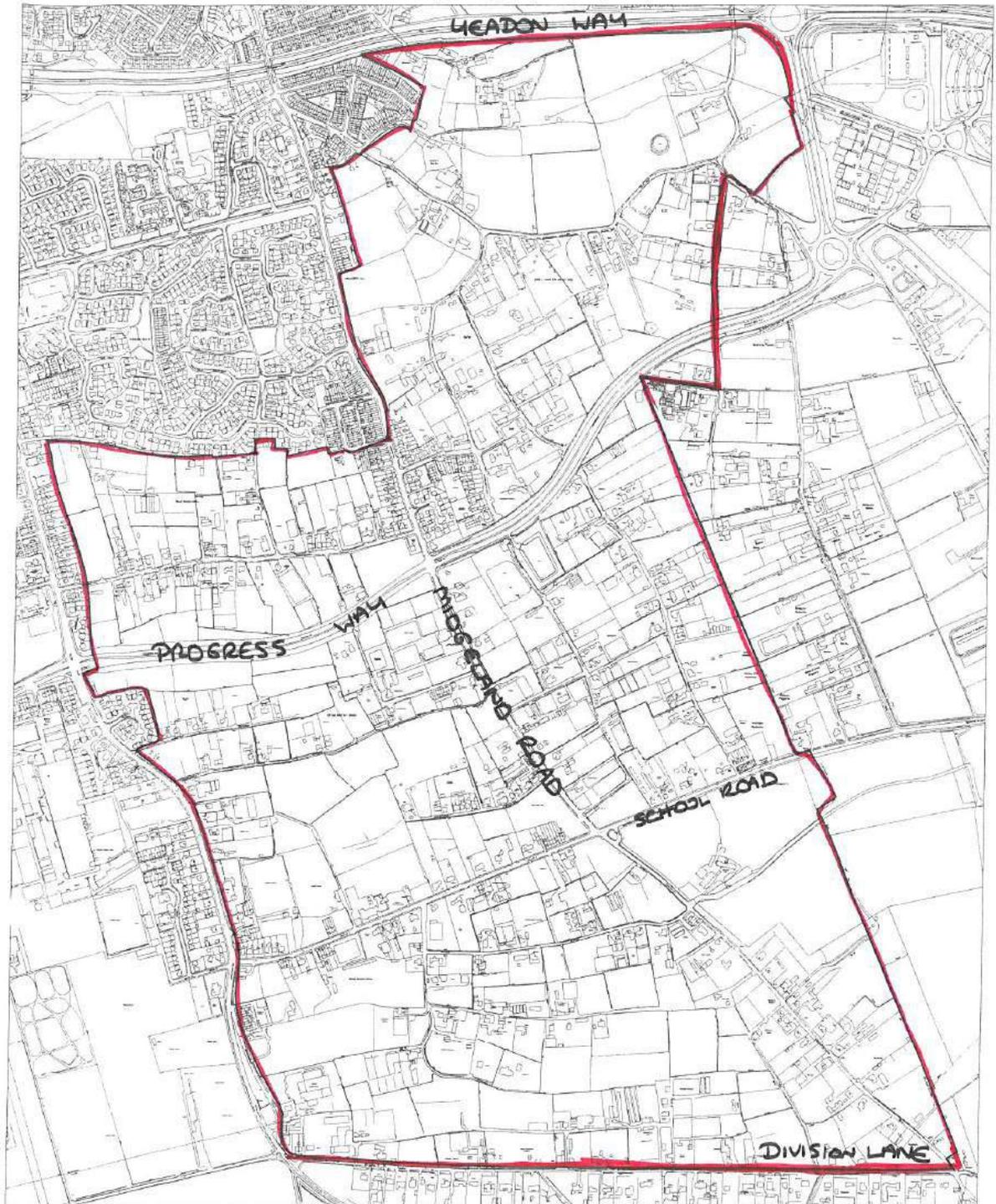
M55 Hub/ Marton Moss

The proposed development of 2,700 new homes in a landscaped setting on lands at Marton Moss on the edge of Blackpool (potentially also including lands in Fylde) would:

- Provide a focus for growth and development
- Complement Blackpool's inner area regeneration by providing a much wider mix of new family housing.
- Strengthen the pattern of trees and hedgerows that bisect the Moss, creating locally distinctive housing clusters which reflect some of the Moss character
- Provide a range of new school, public greenspace and supporting community facilities.
- Provide a network of pedestrian and cyclist friendly routes and improved public transport links
- Extend the Green Belt in south Blackpool to include the lands south of School Road
- Incorporate sustainable technologies to save energy, reduce waste, and re-use water

Marton Moss Leaflet Distribution Area

Marton Moss Leaflet Distribution Area



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Planning Department
Tourism & Regeneration Directorate
PO Box 17, Corporation Street,
Blackpool, FY1 1LZ

planning@blackpool.gov.uk



Title: Area A

629 addresses

Scale: 1:9500

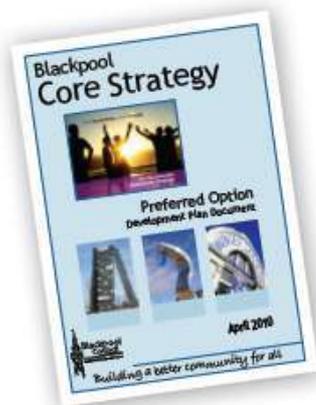
Date: 18/05/2010

Printed by:



Holiday Accommodation Leaflet Distribution Area

Leaflet advertising Cherry Tree Area Forum sent to all Area Forum residents



Blackpool Council is preparing the Core Strategy – Have your say about the proposed development of 2,700 new homes in a landscaped setting on lands at Marton Moss on the edge of Blackpool (potentially also including lands in Fylde).

Come along to **Highfield Humanities College, Lindale Gardens on Wednesday 14th July from 6.30pm** to hear a presentation about the Council's strategic development proposals to deliver the Council's Vision for Blackpool in 2026.

Information stalls will also be provided between 6.00pm and 6.30pm by Blackpool LINK, Blackpool Fylde and Wyre Hospital Foundation Trust and Age Concern. You will also have the opportunity to speak with your Councillor.

For more information, please contact Democratic Services on 477034.



Cherry Tree AREA FORUM
(Covering Clifton, Hawes Side and Stanley Wards)

J90339 5-10

Letter advertising Cherry Tree Area Forum sent to all previous Area Forum Attendees



«Title» «First_Name» «Surname»
«Address_1»
«Address_2»
«Address_3»
«Town»
«Postcode»

Our Ref:
Your Ref:
Direct Line: (01253) 477034
E-Mail: yvonne.ablett@blackpool.gov.uk
Date: 5th July 2010

Dear Sir/Madam

HAVE YOUR SAY ABOUT THE PROPOSED DEVELOPMENT OF 2,700 NEW HOMES IN A LANDSCAPED SETTING ON LANDS AT MARTON MOSS ON THE EDGE OF BLACKPOOL

I would like to invite you to the **Cherry Tree** Area Forum, which is being held on **Wednesday 14th July 2010 at Highfield Humanities College, Lindale Gardens.**

At **6.30pm** you can hear a presentation from Blackpool Council's Planning Division about the Council's strategic development proposals to deliver the Council's Vision for Blackpool in 2026. You will also have the opportunity to ask questions.

Between **6pm and 6.30pm** information stalls will be provided by Blackpool LINK, Blackpool Fylde and Wyre Hospital Foundation Trust, Age Concern and Blackpool Council's Planning Division. You will also have the opportunity to speak privately with your Councillor prior to the meeting and the opportunity to raise any general concerns/ questions at the end of the meeting.

I hope you will take this opportunity to come along to the Area Forum and I look forward to seeing you there.

Yours faithfully

Paul Walker
Executive Director Culture and Communities

BLACKPOOL COUNCIL

**REPORT
of the
HEAD OF LEGAL AND DEMOCRATIC SERVICES
to
CHERRY TREE AREA PANEL**

**CHERRY TREE ARA FORUM MEETING
HELD ON WEDNESDAY 14th JULY 2010**

1. Introduction

The Vice Chairman of the Area Forum, Mrs Barbara Charlton welcomed members of the community to the meeting and tendered apologies on behalf of Councillor Mrs Greenhalgh who was absent due to sickness.

She informed the Forum that at the January Forum 2011, elections would be held to appoint three Community Members onto the Area Panel. She added that nomination forms were available at the meeting and should be returned by 26th November.

Mrs Charlton explained that the evening would consist of a presentation from Mr Graham Page, Group Planning Officer, Blackpool Council regarding the Core Strategy and would include the opportunity to ask questions. She asked that only one person spoke at a time, using the microphone so not to disadvantage those people with hearing difficulties.

2. Context

The Area Panel at its meeting held on 18th May 2010 had agreed that the theme of the Area Forum would be to consider the proposed consider the implications of the Blackpool Core Strategy Preferred Option document.

3. Theme

Mr Graham Page, Group Planning Officer, Blackpool Council explained that the Core Strategy was a new plan designed to focus on the big issues and difficult choices about Blackpool's future development over the next 10 to 15 years. He added that there was a fundamental need to address the wider problems.

He explained that the Core Strategy included:

- Promoting a 21st century resort and town centre offer
- The regeneration of the resort neighbourhoods
- A higher quality and more focused holiday accommodation sector
- Supporting growth at Marton Moss to enhance housing quality and choice, which was critical for this Area Forum.

He added that the two areas of focus were the regeneration of the town centre and inner areas, whilst pursuing the proposed development of Marton Moss as a supporting focus to meet the housing and economic development needs.

Mr Page advised the Forum that following recent Government announcements the Regional Housing Targets had ended, but there was still a need for a Core Strategy to be developed and for consultation to be undertaken to consider the need for new homes in Blackpool and what was the appropriate future development of the Moss. He added that three quarters of the 6,800 new homes needed to meet Blackpool's needs in the next 16 years would be met through inner area regeneration through conversion and existing planning applications.

It was reported that the Core Strategy proposed to allocate land for around 2,700 new homes in a phased release of land. The first phase would be situated on land between Bennetts Lane and Progress Way, the second phase would be on land between Yeadon Way and Progress Way, but would not commence until after 2016. The third phase, south of Progress Way would not start until a future review of the plan had been undertaken. Any development would need to be integrated with decisions taken surrounding neighbouring land within the ownership of Fylde Borough Council.

Mr Page explained that without a comprehensive strategy to ensure appropriate and balanced development in Blackpool, planning applications would continue to come forward, and developments would be likely to be approved on appeal..

The Forum was advised the prime focus of the Core Strategy was to concentrate investment and development in the inner areas, but the development of the Marton Moss/M55 hub was the only sizeable area available to meet the needs of Blackpool's housing market, to provide a wider housing choice. Mr Page added that consultants for Blackpool Council and Fylde Borough Council had produced a prospectus for development 12 months ago, which illustrated the way forward and this had been reflected in the proposals of the Core Strategy.

A key point of the development of the Marton Moss area was for the retention of the neighbourhood character, to develop small clusters of housing as opposed to estates whilst strengthening the pattern of trees and hedgerows that bisect the Moss.

Mr Page explained that the consultation was a statutory process and encouraged residents to put their views in writing with regard to what the future should hold including the types, scale and density of future developments. He added that forms and guidance were available at the meeting.

Mrs Charlton thanked Mr Page for his presentation. Following the presentation, local residents asked a number of questions.

A Forum member commented that Fylde Borough Council had refused plans for development on the Moss (reported in the local media on 2nd June) and therefore the information contained in the Core Strategy was out of date. Mr Page explained that consultation was a statutory process on how to meet the development needs of lands within the area of Blackpool Council, but would need to be integrated, with major issues along the M55 Fylde boundary.

A resident enquired if Kensington Developments had been involved in the development of the Core Strategy. Mr Page confirmed they had not been involved in the plan making process, but they along with other residents/ developers with an interest were expected to respond to the proposals. He added that without a plan there was an increased likelihood of piece-meal developments rather than a coordinated response.

A local resident reported that the Council had previously claimed that the Government had “forced” them to consider the development on the Moss, but now the Regional Spatial Strategy had been scrapped, he asked whether there was a need to continue. Mr Page acknowledged that the figure no longer existed, but guidance from the new Government to Local Authorities was to continue to move forward with preparations of a Core Strategy and to engage local communities to advice on the way forward. He added that the figure was under review and feedback from the consultation process would identify Blackpool’s housing numbers and needs for quality housing.

It was reported that there were 2,000 empty properties in Blackpool and it was asked why those properties could not be renovated instead of building more. Mr Page confirmed that regeneration of the inner areas was a recognised priority and the focus of the Core Strategy, but this solely would not provide a mixed healthy housing offer. Whilst there had been development on the outer edge of Blackpool in the last 10 years e.g. around the College at Bispham and Herons Reach, there was a need for a wider mix of suburban growth to support the inner area, which because of a declining economy had attracted a benefit dependent population.

A member of the Forum asked if the Core Strategy was still a legal requirement if the Regional Spatial Strategy had been abolished, what was the reasons behind the numbers and why was the Core Strategy going against the Strategic Housing Land Availability Assessment (SHLAA) which suggested initial small scale developments working towards larger scale developments. Mr Page reported that ministerial advice was to continue with the development of the Local Development Framework and Core Strategy on how best to meet Blackpool’s needs. A number of Local Authorities had said they would change their housing figures, Blackpool’s position would be agreed following the consultation process. He added that the old figures were based on an annual level of build 444 dwellings per annum as set out in the North West Regional Spatial Strategy.

A resident asked with all the recent Government announcements would the Core Strategy be rewritten and would the consultation deadline remain as the 19th July. Mr Page explained that the deadline had been extended to the end of July and following the consultation any appropriate revisions to the Strategy would be part of further consultations. He added that a separate report specifically on the implications on the Core Strategy of the revocation of the housing numbers would be available in early autumn in response to the housing market, realities and the wider issues.

A Forum member commented on the poor first impression given by the condition of Central Drive and asked why this area was not being developed before considering development on the Moss. Mr Page explained that monies/ bids were being identified for the regeneration of the inner areas, but it was important to spend available funds on projects that would provide the best catalyst for further development.

A local resident enquired who would buy the new houses on the Moss when the average annual salary was £15-16,000. Mr Page explained that there was a need for a better mix of housing to encourage families to live and work in Blackpool.

A Forum attendee stated that there was no justification for the development and what was the consequence of doing nothing. Mr Page reported that the basis of the Core Strategy was to plan for a better mix of housing. Without the Strategy, the existing narrow housing offer that was slanted towards rented, poor quality housing would

continue and with a naturally declining population, other housing options needed consideration in order to maintain the population.

It was reported by a local resident that the Moss was a bog and unsuitable for this level of development and would negatively affect the fragile ecological area. Mr Page acknowledged the opposition to the proposals and confirmed that the area was not at risk from flooding from rivers or seas, but from surface water flooding and planning applications needed to ensure those issues were addressed. He added that the Environment Agency were preparing a surface water management plan, for all of Blackpool, for publication in 2011 and United Utilities were undertaking an infrastructure review and reporting in a similar timescale.

It was suggested by a Forum member that following the closure of Pontins and the loss of funding to support the new college development on Rigby Road that alternative development sites already existed in Blackpool. Mr Page reported that Pontins was within Fylde and would not affect Blackpool's figures. He added that it had been the intention to consider the Bispham college site for housing development, but the college would now be refurbished. The site at Rigby Road was now likely to come forward for some form of mixed use development, including housing and had been accounted for in the figures.

A local resident asked why the tram depot had not been located at Rigby Road and why additional expense been incurred with the installation of new points if it was not to be used. Mr John Donnellon, Assistant Director - Housing, Planning and Transport, Blackpool Council, who was also in attendance explained that the Rigby Road site was unsuitable as it could not accommodate the new style trams and Starr Gate was the only available option. He added that points had been installed as part of emergency track works to accommodate the existing trams and not the new ones. He offered to discuss the matter further with the resident outside of the meeting.

A few residents enquired why there was no transport policy linked into the housing development, or consideration for infrastructure and they expressed concerns to the proposed down grading of services by Blackpool Transport and the lack of a transport interchange in the Town Centre. Mr Page explained that the proposals in the Core Strategy outlined a number of key strategic improvements to the rail, tram and road network, but more detailed assessments/ policies in partnership with the operators Blackpool Transport Services would need to be developed. He added that the Core Strategy provided the principal of development, but did not deliver the detail as this would be considered in the joint supplementary planning document in consultation with Fylde Borough Council and would address issues of drainage, schools etc.

A resident enquired why the former Devonshire Road Hospital site could not be developed for housing. Mr Page explained that the land was owned by NHS Blackpool and it was their decision as to the future of that site.

It was suggested that 2,300 properties had already been built since the Strategy was prepared and why were brown field sites not being considered. Mr Page confirmed that the Core Strategy considered brown field sites and there had been a number of conversions and small site developments, but this did not provide a range of different types of housing and there was a need to maximise opportunities.

A couple of Forum members reported that the proposed Kensington development did not included the statutory green space entitlement and social problems could be addressed if

more access to green space was provided through, parks and gardens etc. Mr Page reported that beyond the existing lanes and tracks, public access into the open lands was currently limited and potentially development could enhance recreational access. He added that whilst the recent Government announcements allowed for greater flexibility, as they were no longer bound by housing targets, the Core Strategy was about proposing what was suitable and most appropriate for the Moss.

A Forum member commented on the proposals to reduce the holiday area where hotels and guest houses were still trading and employing residents. She was concerned that by reducing the holiday area, properties would be unable to continue trading resulting in job losses, empty properties or properties converted into Houses in Multiple Occupation. Mr Page explained the basis of the review was to seek a maximum area where solid holiday use could be retained and safeguarded. He added that without a defensible line, there was no basis to resist appeals for properties to be converted into dwellings, which would undermine the area. It was explained that outside these areas, those hoteliers that wished to continue to trade would continue to be encouraged to provide better quality accredited holiday accommodation, while the policy provided greater flexibility for those wishing to convert to residential use. Mr Page acknowledged that through the consultation process, if the proposed boundaries were wrong, the boundaries would be reconsidered and redrawn.

A Forum member sought clarification on the use of commuted sums paid by a developer when parks/ play areas were not included in the development to within 1000m of the development. Mr Page explained that was true for children's provision, but for youth/ adult facilities the Borough was divided into five wider zones and explained that commuted sums could be within the same zone as the development or an adjacent zone.

Councillors Question Time

At the start of the allotted time, the presentation had not concluded and the Vice Chairman, Mrs Charlton explained the position and asked members if they wished to ask their Councillors questions or continue the presentation. The meeting agreed to continue with the presentation.

4. Conclusion

The purpose of the meeting was to provide residents with an opportunity to receive a presentation from a representative of Blackpool Council and voice their opinions on the implications of the Blackpool Core Strategy Preferred Option document.

**BLACKPOOL COUNCIL
REPORT
of the
HEAD OF LEGAL AND DEMOCRATIC SERVICES
to
THE REVOE AREA PANEL**

**THE REVOE AREA FORUM MEETING
HELD ON TUESDAY 13th July 2010**

1. Introduction

The Vice- Chairman of the Area Forum and Community Member, John McIntosh welcomed members of the community to the meeting. He introduced Mr Beattie, Clerk to the Panel/ Forum and Mr Taylor, Senior Supporting Officer.

He explained that unfortunately due to illness, the Chairman Councillor Mary Smith was unable to attend, Mr McIntosh therefore took as the Chair of the meeting as the Vice-Chairman.

Mr McIntosh explained to the Forum that the evening would consist of a presentation on the Blackpool Core Strategy with the opportunity at the end for residents to ask questions of their local Councillors. He introduced the Councillors for the other Wards included within Revoe Area Forum in attendance , Councillor Jackson (Victoria Ward) and Councillors Stansfield and Price (Tyldesley Ward.)

He informed the Forum that at the January Forum 2011, elections would be held to appoint three Community Members onto the Area Panel. She added that nomination forms were available at the meeting and should be returned by 26th November

Members of the Community would also have the opportunity, as part of the Question Time element of the meeting to ask questions of Councillors and Council Officers

2. Context

The Area Panel at its meeting held on 13th May 2010 had agreed that the theme of the Area Forum would be Blackpool Core Strategy.

3. Themes

Core Strategy

Mr Graham Page, Group Planning Officer, Blackpool Council explained that the Core Strategy was a new plan designed to focus on the big issues and difficult choices about Blackpool's future development over the next 10 to15 years. He added that there was a fundamental need to address the wider problems.

He explained that the Core Strategy included:

- Promoting a 21st century resort and town centre offer

- The regeneration of the resort neighbourhoods
- A higher quality and more focused holiday accommodation sector
- Supporting growth at Marton Moss and the M55 hub to enhance housing quality and choice.

He added that the two areas of focus were the regeneration of the town centre and inner areas, whilst pursuing the proposed development of Marton Moss and the M55 hub as a supporting focus to meet the housing and economic development needs.

Mr Page explained that the aim of the strategy in the holiday accommodation area was to help to focus development in key areas. The major issue being that Blackpool had too many bed spaces of too low a quality, there was in conclusion too little top end accommodation and too much accommodation without accreditation. This poor quality and provision of accommodation undermines both the visitor economy and Blackpool's communities.

The Council's objectives would therefore be to retain holiday accommodation as much as possible, retaining the amount of accommodation and encourage higher quality of accommodation, increase visitor numbers and in general creating mixed neighbourhoods that work. Blackpool's future would be concentrated on protecting the Promenade and other key holiday accommodation areas and mixed neighbourhoods that work. Policies would be in place to protect the frontages along the Promenade, The Cliffs, Lord Street, the Town Centre, Foxhall Village, South Beach and the Pleasure Beach.

It might be that the future of the plan excluded areas from the holiday area in this case the Council would not automatically change use away from holiday use but would be receptive to applications to convert the property to high quality family residential accommodation. What would not be acceptable would be the conversion of properties to a poor quality or to houses in multiple occupation. Mr Page explained that multi-agency enforcement work was common working practice in tackling HMO issues and progress was being made within the resort neighbourhood area. He explained that tackling this problem would remain a high priority for the Council.

It was explained that draft guidance for the conversion of holiday accommodation into high quality had been produced in the form of the New Homes from Old Places Supplementary Planning Document.

Mr Page explained that this presentation formed part of the consultation period for the document which still ongoing. This had followed the Council's Executive decision on the 10th March 2010 and following this consultation the document would be published towards the end of 2010 and then subject to examination in public in 2011.

Members of the public then asked questions regarding the presentation, which were responded by Mr Page with the assistance of Mr Donnellon (Assistant Director for Planning and Transport)

A member of the public asked about clarification regarding specific developments within the Revoe Area Forum area. Mr Page explained that the Core Strategy was a planning document which enabled rather than proposed development.

A local hotelier asked for more clarification on the rules regarding the conversion of hotel into a single dwellinghouse. Mr Page and Mr Donnellon both stated that while they could not comment on individual cases, that the Council would look favourably on schemes which met the Council's criteria for high quality development.

A member of the public asked how the Council's recent much publicised purchase of the Winter Gardens and Tower. Mr Page and Mr Donnellon explained that while not directly linked to the Core Strategy, this purchase worked in support of the plan's objectives in supporting leisure uses within the town centre area.

4. Councillors Question Time

A large number of residents expressed concern at the new road layout at the junction of Waterloo and Lytham Roads. Mr Donnellon explained that the roundabout had been designed with adverse camber banks and ramp approaches to slow down vehicles entering the area. Central medians had been included as pedestrian refuges and lanes had been narrowed to give members of the public the most direct crossing route. The environment into which drivers entered when approaching the roundabout had been designed to slow vehicles down and make drivers more cautious. As it was a new road layout the design would be subject to review in the near future.

A resident expressed concern at the new layout of a cycle path along Bloomfield Road and the safety issues with the shared road space. Mr Donnellon explained that the path had been designed to include shared road space as experience from abroad had shown that these spaces both slowed traffic and provided a safer environment for cyclists. The scheme was part of the National Cycle Route scheme so would be evaluated in due course.

5. Conclusion

The Chairman reported that the purpose of the meeting was to provide residents with the opportunity to find out more about the Core Strategy and thanked Mr Page for his presentation.

**BLACKPOOL COUNCIL
REPORT
of the
HEAD OF LEGAL AND DEMOCRATIC SERVICES
to
THE GATEWAY AREA PANEL**

**THE GATEWAY AREA FORUM MEETING
HELD ON WEDNESDAY 21ST JULY 2010**

1. Introduction

The Chairman of the Area Forum and Ward Councillor for Brunswick, Councillor Gary Coleman welcomed members of the community to the meeting. He introduced his co-Ward Councillor for Brunswick, Councillor Simon Blackburn and the Councillors for the other Wards that represented The Gateway Area Forum Councillors Ivan and Mrs Sylvia Taylor (Claremont). He also tendered apologies on behalf of Talbot ward Councillors Ron and Gary Bell, who due to the rescheduling of the meeting and prior commitments were unable to attend the meeting. Councillor Coleman introduced Mr John Donnellon, Assistant Director - Housing, Planning and Transport, Blackpool Council and Mrs Yvonne Ablett, Democratic Services, Blackpool Council.

He also raised awareness of the forthcoming January Forum at which there would be an election of three Community Members. Councillor Coleman reported that nomination forms were available at the meeting for anyone interested in becoming a member. He added that the Panel was responsible for the role of the Forum and the approval of Area Panel funding.

Councillor Coleman explained that the evening would consist of a presentation from Mr Graham Page, Group Planning Officer, Blackpool Council regarding the Core Strategy and would include the opportunity to ask questions.

2. Context

The Area Panel at its meeting held on 11th May had agreed that the theme of the Area Forum would be to consider the proposed consider the implications of the Blackpool Core Strategy Preferred Option document.

3. Theme

Mr Graham Page, Group Planning Officer, Blackpool Council explained that the Core Strategy was a new plan designed to focus on the big issues and difficult choices about Blackpool's future development over the next 10 to 15 years. He added that the focus of the Strategy was distinctly on the regeneration of the inner areas with the potential supporting growth in the Marton Moss/ M55 area.

He reported that the big issue was the promotion of a 21st century resort and town centre offer and the regeneration of the resort neighbourhoods. Mr Page explained that the success of the Town Centre impacted widely on the rest of the town and this was evident with the development of new buildings and open spaces e.g. Hounds Hill

expansion, St Johns Square and Clifton/ Birley Street. He added that irrespective of the withdrawal of some public sector funding the development of both the Talbot Gateway and the Winter Gardens would continue.

The Forum was advised that the proposals for the Town Centre included:

- High Quality niche shopping
- Development of Blackpool's café culture
- Attractive public spaces
- Enhancement of the Winter Gardens
- New Promenade Leisure frontage.

Mr Page explained that due to the withdrawal of Government funding, the site at Rigby Road was now likely to provide new quality housing on a mixed-use development.

It was reported that the headlands were near completion and would provide a welcome boost with the development of an events arena, attracting more people to the Town Centre. Mr Page added that the focus would be to secure new investment and development in the three key resort gateways, Central Drive, Lytham Road and Dickson Road, which currently provided a poor first impression due to the surplus of run down, poor quality properties.

Mr Page reported on the future of Blackpool's holiday areas, which was of significant importance to the Forum members. He explained that currently there were 1,650 hotels and guesthouses providing over 56,000 bed spaces. Following two public consultations in The Gateway area, the findings indicated that the majority of businesses agreed that there were too many bed spaces, too little quality and too little accredited and top end accommodation. It was believed that the failing holiday accommodation attracted houses of multiple occupation, the wrong type of resident and its associated problems were undermining the visitor economy and communities.

The consultations confirmed that businesses and residents wanted the right amount of quality accommodation, to retain the holiday accommodation where possible, to increase visitor numbers and provide mixed neighbourhoods (e.g. residential and commercial) that were successful.

Mr Page explained that the Promenade provided the core shop window frontage for Blackpool and whilst holiday accommodation would be safeguarded this would not preclude existing properties from being redeveloped into higher quality establishments. He added that the buildings and the use of those buildings along the promenade were vital to Blackpool's future.

The Forum was advised that off the Promenade the main holiday accommodation areas would focus around six reduced areas:

- The Cliffs
- Lord Street – extended to both sides and between Springfield Road and Mount Street.
- Town Centre – south of including Albert Road, Adelaide Street and Hornby Road.
- Foxhall Village

- South Beach
- Pleasure Beach

Mr Page added that a supporting document to the Core Strategy, 'Holiday Accommodation Supplementary Planning Document' had been drafted and was currently out for public consultation and he welcomed comments by the end of July.

It was explained that outside the designated holiday areas, those hoteliers that wished to continue to trade would continue to be encouraged to provide better quality accredited holiday accommodation, while the policy provided greater flexibility for those wishing to convert to residential use. Mr Page reported that under the draft new guidance 'Residential Conversion and Sub-division Supplementary Planning Document' any conversions would be to a high standard providing either two/ three bedroom apartments or suitable family accommodation and not one bed/ small flats which attracted a benefit dependent population. He added that the policy supported enforcement action to secure satisfactory compliance with the planning permission.

Mr Page explained that the consultation was a statutory process and encouraged residents to put their views in writing. He acknowledged that through the consultation process, the proposed boundaries would be fully reconsidered, and changes would be made where appropriate.

Councillor Coleman thanked Mr Page for his presentation. Following the presentation, local residents asked a number of questions.

A local hotelier asked why the proposed holiday areas excluded Reads Avenue, Palatine Road and Havelock Street yet including Foxhall village, which consisted of predominately unaccredited premises in a poor state of repair. Mr Page explained that the boundaries had been determined based on a criteria that was not solely based on appearance, but the strengths of individual areas and the future potential of that area. He added that no decision had been made and through the consultation process, recommendations would be made to the Executive.

A local resident asked when the regeneration of the sea front would be completed. Mr Donnellon reported that it would be substantially finished by May 2011 and the tramway improvements by 2012, although the trams would be operational during the holiday season. He acknowledged that the timescales had slipped, but the Council had structure contracts so the Council was not at financial risk and they were reliant on a range of contractors.

A member of the Forum asked whether the proposals for Snow City were on going. Mr Page explained that an 18-month exclusivity deal had been agreed with a potential developer to assess the viability of the proposals and there was a remaining 6 months before any conclusions could be made.

A number of hoteliers asked why the consultants employed to identify the proposed boundaries had not approached businesses, as vital trading information was unknown when the boundaries were drawn. They added that Blackpool catered for one night stays, with the number of clubs/ bars and limited family entertainment/ bars. Mr Page confirmed that the consultants had not visited premises, but had received accreditation information from StayBlackpool, planning records,

enforcement and land use information and had recommended areas of focus and potential boundaries to Officers for consideration. He explained that the Council sought to address the imbalance and focus on families, but the marketing of properties across the town was ultimately a product of individual business decisions. Mr Page added that the Council would raise awareness of the narrowing offer and promote investment in the shopping offer and high quality attractions. He acknowledged that where a strong holiday focus had been identified in a particular street it would be reconsidered.

A resident complimented the open space provided by the promenade development and asked that this not be ruined by the development of various structures e.g. public toilets, sub stations etc that obstructed the sea view, as this would be detrimental as proven in the South Shore area and at Morecambe. Mr Page explained that key facilities were needed, but would be designed not to undermine the sea view, but to retain the open aspect.

A Forum member commented that the proposed holiday areas looked smaller and if Blackpool achieved its goal to encourage families to visit would those areas be able to accommodate the estimated 10 million visitors and if there were too many beds why was planning permission granted for further Travelodge developments, which were destroying the character of Blackpool. Mr Page explained that the holiday areas were reduced and focussed on over 100 promenade and 500 off promenade premises, but the proposals made provision for the number of visitors, including the continued provision of substantial numbers of holiday accommodation premises across the mixed use areas. He further commented budget hotels were a normal part of the holiday accommodation offer across towns all over the country and it would be unwise to refuse quality new developments.

Several hoteliers enquired how the Council proposed to prevent properties that would no longer be included in the holiday area from becoming houses of multiple occupation when they were currently unable to prevent this from happening. They felt the enforcement process was too slow and after four years, properties were legally permitted to operate as houses of multiple occupation. Mr Page acknowledged that there were issues with those types of properties and current planning controls and loopholes did not always allow for prevention. He added that the Core Strategy would prevent further unlawful changes and support enforcement action. He added that following a Council restructure in April 2010 the licensing, planning, housing and enforcement teams were now within the same Department, providing a coordinated no tolerance approach and residents would soon see improvements.

Mr Donnellon explained that 10 prosecutions were currently pending and a multi agency approach had been adopted including the Police, Fire Service etc that where properties were non compliant they would now be closed down. He added that properties both in and out of the proposed holiday areas would receive a consistent approach to both enforcement and support in seeking accreditation.

A resident reported that the Development Control Committee had approved an enforcement order on 2nd June 2008 as a property it was no longer trading as a hotel, but the Council had not enforced this. Another resident reported that a further hotel on Palatine Road that had been converted in a one bedroom flat and bedsits and no action had been taken in the subsequent five years. Mr Page explained that he was not part of the enforcement team, but it was agreed that those matter would be investigated and the outcomes reported at a future meeting.

It was reported that the holiday areas had been changed on two previous occasions. It was believed that in the current climate hoteliers running quality hotels in the inner areas should be supported not removed from the holiday area. There was negative speculation as to who would buy the former hotels/ guesthouses and convert them into residential properties. Mr Page explained that the Council had to spend wisely on a catalyst that would regenerate Blackpool as a whole and added that properties were already changing and without a defensible line, there was no basis to resist appeals for properties to be converted into dwellings, which would undermine the area. He explained that individual streets would be reconsidered and if future holiday use could be safeguarded then if appropriate the proposed boundaries would be changed.

A couple of hoteliers asked if the holiday accommodation, out of the proposed areas, was converted to residential dwellings where would people gain employment as tourism was the main area of employment. Mr Page explained that to do nothing was not an option, he acknowledged that whilst there was a cost of conversion it was necessary to aspire to new standards and improve the mixture of properties or the downward spiral would continue. He added that the Council was aware of the need to diversify the economy and the support of developments such as the Talbot Gateway, the Technology Business Park (Faraday Way) and the Blackpool Business Park (Amy Johnson Way) recognised the need for alternative types of employment.

A local resident referred to the unfinished development on Crystal Road, where properties had been purchased by the Council to demonstrate how properties could be converted and asked if the conversion was cost effective. Mr Donnellon explained that promised funding had been delayed and that work was anticipated to start in August, but acknowledged that due to current market forces there might be a gap in value.

A number of attendees raised the issues of the property resale value, the reluctance of lenders to support hotels removed from the proposed holiday areas and suggested that a single plot would potentially lose £100,000. It was intimated that plans to change the holiday areas had been proposed in 2002, but surveyors were unaware and they had now been removed from the Council's website. Mr Page reported that the existing wide Resort Neighbourhood Policy had itself only been approved in 2004 by the Council, and that the draft Core Strategy proposals for a reduction in the holiday areas had only been approved by the Executive in March 2010. He added that negative changes were already occurring and by focusing on improving the quality of hotels and residential accommodation would in the long term result in better areas and increased property values. Mr Donnellon pointed out that the value of a business should be based on its turnover not its geographical location and offered to discuss proposals with financial institutions and estate agents.

A forum attendee commented that the number of hotels was dependent on the number of visitors to Blackpool and there was too much emphasis on hotels and not enough on attracting new visitors to the resort. He also disapproved of the St Johns Square development due to the on/off inclusion of public transport. Mr Donnellon confirmed that by supporting improvements to infrastructure such as the Winter Gardens and the Talbot Gateway would improve the visitor economy. He also defended the Council's approach to St Johns Square, adding the project was delivered to budget and was a fantastic example of open space.

A resident asked for clarification on whether vertical developments were required when converting a hotel to flats and was the provision of parking spaces needed. Mr Page explained there was no blanket rule for conversions and there were allowances for different types of developments, but the layout of properties would be considered to ensure noisy rooms e.g. a lounge was not adjacent to a quiet room in a

neighbouring property. He added that the policy on parking was dependent on national/ local maximum standards.

Councillors Question Time

At the start of the allotted time, the presentation had not concluded and the Chairman, Councillor Coleman explained the position and asked members if they wished to ask their Councillors questions or continue the presentation. The meeting agreed to continue with the presentation.

4. Conclusion

The purpose of the meeting was to provide residents with an opportunity to receive a presentation from a representative of Blackpool Council and voice their opinions on the implications of the Blackpool Core Strategy Preferred Option document.

A number of issues had been raised as documented in the report and would be investigated and reported back to the Area Panel in the first instance.

Press Articles relating to the Core Strategy

900 hotels wiped off tourism map



One of the hotels on Crystal Road, South Shore

Date Published:

03 March 2010

By [Shelagh Parkinson](#)

Blackpool Gazette

HUNDREDS of Blackpool hotels are set to lose protected status after plans were unveiled to shrink the main holiday accommodation areas by almost two thirds.

The changes, put forward by Blackpool Council, will leave just 500 bed and breakfasts and guesthouses, all situated off the seafront, within six designated areas.

Around 900 hotels will become part of new mixed neighbourhoods where good quality residential development will also be encouraged.

But hoteliers fear without the special status, which protects hotels from being transformed into residential accommodation, it will be easier to convert former guesthouses into hostels and houses in multiple occupation (HMOs), which attract undesirable residents who are off-putting to holidaymakers.

There will be no change to the Promenade whose 130 or so hotels will continue to be in the designated holiday area.

The move comes after a report in January said over capacity in Blackpool's accommodation sector added up to around 14,000 bed spaces or around 400 holiday premises.

Many failing guesthouses are no longer viable and there have been warnings that Blackpool will never return to its overnight visitor heyday of the 1950s.

A report prepared by town hall planners said: "No future scenario in Blackpool will restore past visitor numbers and the quantity of required holiday accommodation needs to be substantially reduced.

Hotels plan hailed as 'brave and bold'



Coun Maxine Callow

Published Date:

04 March 2010

By Paul Fielding

Blackpool Gazette

BLACKPOOL'S new hotels strategy was today defended as a brave and bold move. The Gazette yesterday revealed a masterplan which would see certain areas in the resort's tourism heartland given protected holiday status while other tourism hotspots miss out.

Around 900 properties could be allowed to switch from hotel to private accommodation.

But the move has spread fears hotels in those areas passed over will find themselves surrounded by hostels.

While the plan has come under fire, Coun Maxine Callow said big decisions must be made for the resort's future.

The cabinet member for tourism and regeneration said: "You have to be brave and bold and you can't just think of now, you have to look at what you want Blackpool to be like in 20 years. I think even people in the industry would accept we don't need all the bed spaces we have now in what is a dwindling market.

"What we have to go for is quality and offer something for everyone. That's why we have travel inns here along with high quality hotels like the Hilton, De Vere and Imperial.

"What we've heard from the major political parties and conference organisers is, while they've been disappointed with the Winter Gardens, they've also been unhappy with the level of three and four star accommodation in Blackpool.

"They are big spenders and we need to get them back."

Town hall chiefs insist former hotels will become family homes but hoteliers have spoken of their concerns the premises will become houses of multiple occupation.

And business owners in streets which will remain in Blackpool's designated holiday areas said they were relieved to be included in the protected zones.

Public Exhibition Summaries

Core Strategy Statement of Consultation

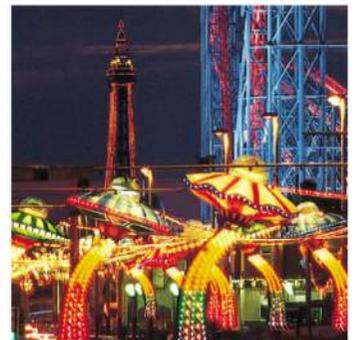
Appendix F – Preferred Option: Consultation Responses

Blackpool Council

Core Strategy Preferred Option

Consultation May-July 2010

Schedule of Representations



Chapter 1: Introduction

Resp No	Name/Company	Address	Comment	Council Response
Context				
0060	Fylde Borough Council	Town Hall Lytham St Annes	<p>Page 5, Figure 1: Request that St Annes and Lytham should be shown separately.</p> <p>Also, in trying to demonstrate the strong spatial linkages that exist to Wyre and Fylde suggests that the 'Blue route' should be shown on this figure.</p>	<p>Point accepted. Maps produced for the Revised Preferred Option show these places separately.</p> <p>Figure 1 is an introductory context plan showing the boundaries, main settlements, and major features of the existing transport network of the Sub-Region. The Core Strategy subsequently refers to ambitions for a number of additions and enhancements to the transport network, but the introductory plan is appropriately focused on existing key features and it is not appropriate to include a specific proposal. Reference to the proposal is included in policy (CS5 'Connectivity' and CS28 'South Blackpool Transport and Connectivity' in the Revised Preferred Option), along with the other key strategic improvements to the sub-regional transport network supported by Blackpool Council.</p>
Evidence Base				
0031	Sport England	Building 3 Universal Square Devonshire Street Manchester	<p>Appears that the evidence base in relation to open space, sport and recreation is currently incomplete. The evidence base for the Core Strategy on the Council's website does not include an open space, sport and recreation audit / assessment of needs.</p>	<p>The 2009 Audit will be made available on the Council's Core Strategy Evidence Base webpage. The detailed audit, as stated, sets out the quantum, quality, and accessibility of recreation open space provision across Blackpool, and provides a basis for but does not comprise a full assessment of current and future need in accordance with a PPG17 compliant assessment. The focus of the policy is appropriately informed by this detailed audit; and the focus of the Core Strategy</p>

Resp No	Name/Company	Address	Comment	Council Response
			Considers that the Core Strategy is weakened by its relationship to the saved policies in the Local Plan.	<p>on inner area regeneration and South Blackpool growth and enhancement is not compromised by its current limitations.</p> <p>Core Strategy policy provides an overarching statement of the Council's intent and commitment to protect, improve and enhance the quality and value of existing greenspace in Blackpool. The Core Strategy is supported by an appropriate evidence base and there is no conflict with saved Local Plan policies - which continue to provide further detail on the Council's consideration of development proposals for open space, sports and recreation.</p>
Sustainability Appraisal				
0060	Fylde Borough Council	Town Hall Lytham St Annes	<p>Page 47, Para 4.3.3 of the Sustainability Appraisal Report (SAR) states 'The proposals for substantial development near the terminus of the M55 motorway have been developed in conjunction with neighbouring Fylde Borough Council.' Fylde Borough Council officer representation on the M55 Hub Conceptual Master Plan Client Group has been purely part of a technical exercise which will be used to inform our Core strategy's preparation. Fylde Borough Council has not formally considered or agreed to develop proposals for substantial development near the terminus of the M55 motorway.</p> <p>The SAR acknowledges that the M55 Hub section within the Core Strategy 'contains the greatest number of policies that are potentially in conflict</p>	<p>This level of development is no longer being pursued by the Council. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>A number of amendments were made to the Core Strategy following the SA report and were incorporated in the document. However, this level of</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>with the SA Objectives' In recognition of the permanent adverse impacts the SA recommends that a number of mitigation measures be provided within the Core Strategy. No mitigation has been provided within the Preferred Option and I am not aware that an Infrastructure Plan has been prepared.</p> <p>The Preferred Option acknowledges that the main flood risk to Blackpool is from excessive storm-water events. This is combined with page 102, Para 2 which states 'the cumulative impact of further new development on the current combined system would have an adverse impact on the current network'. The seriousness of the adverse impact upon waste water management is not however quantified. It is recommended that you re-consult the Environment Agency (EA) on this matter as I understand the EA consider the potential adverse impact upon the waste water system to be a serious issue. If the Preferred Option is to be deliverable then more evidence is required to demonstrate how this impact is to be mitigated.</p> <p>I understand that Hyder undertook the Sustainability Appraisal (SA) on the basis that the M55 Hub would comprise a residential capacity of approximately 7,000 dwellings and 50 ha of employment land. Their appraisal considers the M55 Hub in Blackpool's terms given that it</p>	<p>development is no longer being pursued by the Council. A revised Sustainability Appraisal Report is being undertaken which reflects changes and will reassess the Revised Preferred Option of the Core Strategy. An Infrastructure and Delivery Plan is being prepared and will be completed in support of the Pre Submission edition of the Core Strategy.</p> <p>The level of development set out in the Preferred Option is no longer being pursued by the Council. Infrastructure limitations with respect to surface water and waste water are highlighted in Policy CS26 'South Blackpool Housing Growth' of the Revised Preferred Option, which sets out that housing development in South Blackpool needs to address surface water and waste water issues.</p> <p>The Infrastructure and Delivery Plan will set out the maximum information available from engagement with the EA and UU, and from the ongoing work on the Blackpool Surface Water Management Plan and the Central Lancashire and Blackpool Growth Point Water Cycle Study.</p> <p>The level of development set out in the Preferred Option is no longer being pursued by the Council. A Sustainability Appraisal will be undertaken for the Revised Preferred Option.</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>delivers the associated community facilities, district centre, schools, etc. It is now assumed a reduced number of dwellings are now proposed as referred to in the DLA Draft Final Report, whereby the critical mass which will deliver the associated facilities is diminishing too. I consider that the SAR would need to further consider the reduced outputs which may question whether the M55 Hub would remain as the most sustainable option based upon a reduced scale of development with less social infrastructure.</p>	

Chapter 2: Blackpool Issues and Influences

Resp No	Name/Company	Address	Comment	Council Response
Key Issues				
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade, Blackpool	Support the key issues to be addressed in the Core Strategy.	Comment noted.
0031	Sport England	Building 3 Universal Square Devonshire Street Manchester	There is no direct reference to open space issues on page 11. Given that final paragraph of the Mini Spatial Profile on page 9 states that much of the intensively built up inner area has little or no open space, is this lack of open space not regarded as an issue, or is it simply not seen as a key issue?	The Core Strategy recognises the lack of open space, particularly within the inner area and also the limited opportunities to directly address this, given the intensively built up existing urban area. Whilst this issue was set out in the Preferred Option, it is now specifically included as one of the key issues in the Revised Preferred Option. Policy CS6 'Green Infrastructure' is the key policy which aims to address this issue.
	Blackpool, Fylde & Wyre Economic Development Company		Identify additional key issues: <ul style="list-style-type: none"> - Low productivity being the primary threat to the successful economic growth and competitiveness of Blackpool and the Fylde Coast - Relatively low proportion of the Working Age Population in Blackpool - Low level of employment in higher GVA generating sectors 	It is agreed these are all key issues underlying Blackpool's economy as detailed in the supporting evidence base. The spatial portrait of Blackpool's economy has been redrafted in the Revised Preferred Option to include more detail and these issues are now encapsulated. Policy CS3 'Economic Development and Employment' is the key policy which aims to address these issues.
0038	Natural England	Hornbeam House Electra Way Crewe Business Park Crewe	Support the key issues however, raise concerns over the use of the term 'balancing' which suggests positive and negative effects. Would welcome change being managed in such a way as to secure development ensuring no net losses for the natural environment.	Comment noted, although Blackpool's geographical constraints means it must balance the need to plan for development against its tightly defined boundary and intensely built-up urban area. The Core Strategy identifies Blackpool's important natural landscape and proposes policies which ensure that any development protects - and where appropriate enhances - this character.

Resp No	Name/Company	Address	Comment	Council Response
0050	The Noble Organisation	1a Dukes way Court Team Valley Trading Estate Gateshead	The plan needs to recognise that new quality attractions must complement and not undermine existing facilities.	Comment noted. This issue regarding sustaining a high quality, year round visitor offer includes providing new high quality attractions, but does not exclude existing attractions which are also important to strengthen the resort appeal; indeed important existing tourist attractions are also supported in Core Strategy policy.
Linkages and Planning Policy Context				
0031	Sport England	Building 3 Universal Square Devonshire Street Manchester	This section would benefit from revision following the revocation of regional strategies.	This is recognised and the policy context is re-drafted in the Revised Preferred Option.
Spatial Profile				
0008	Ms Angelia Hinds	21 Moss House Road, Blackpool	Borough boundary is incorrect on Spatial Profile diagram (page 10)	Comment noted. All maps to be revised for the Revised Preferred Option.
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	Pleasure Beach appears to be omitted from the Main Tourist Areas designation in the Existing Spatial Profile. Unclear as to what the significance of this designation is, as it is not specifically referred to elsewhere in the document, with the possible exception of a reference on Page 59 in relation to movement within the resort.	The Plan is only an indicative illustration of the pattern of land uses within Blackpool, focused on the areas of holiday accommodation, and has no wider implications. It is superseded in the Revised Preferred Option with other, more focused plans. The Pleasure Beach is included in the Key Diagram.
0031	Sport England	Building 3 Universal Square Devonshire Street Manchester	Suggests that the Spatial profile is too limited in terms of the information it presents and should include information on the resident and visitor population of Blackpool, and how they are projected to change. Without this information it is difficult to assess the scale of change facing the area, or to get a handle on the impact that the visitor population has. Information on projected population change would allow the proposed	The Spatial Profile has been re-drafted in the Revised Preferred Option and now includes more detail on Blackpool's population, economy, housing and neighbourhoods, environment and transport issues. Issues are also identified in supporting documents and the evidence base.

Resp No	Name/Company	Address	Comment	Council Response
			levels of housing growth in the core strategy be set into context.	
0050	The Noble Organisation	1a Dukesway Court Team Valley Trading Estate Gateshead	Coral Island should specifically be identified in figure 2 in the Main Tourist Area as one of the resorts main attractions.	Figure 2 is only an indicative illustration of the pattern of land uses within Blackpool; no attractions are identified, It is superseded in the Revised Preferred Option with other, more focused plans.
0060	Fylde Borough Council	Town Hall Lytham St Annes	Page 10, Figure 2: The Borough Boundary is wrong between Squires Gate Lane and Yeadon Way.	Point accepted. Maps produced for the Revised Preferred Option show the correct boundary.

Chapter 3: The Spatial Development Framework: Vision and Objectives

Resp No	Name/Company	Address	Comment	Council Response
Spatial Objectives				
0001	Rashmi Pandav Blackpool Congregation of Jehovah's Witnesses	9 Lowthorpe Crescent Preston	4th objective, 2nd bullet point would benefit with the word "community" added. This would then read "meeting needs and aspirations for residents for new services and community facilities"	The objectives have been re-drafted in the Revised Preferred Option to provide greater clarity, including this particular objective which is now objective 8 and includes reference to 'community'.
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	Generally support the Spatial Objectives which the Council will seek to achieve by 2026. However, consider that the 4th bullet point under 'Sustainable regeneration, diversification and growth' should be amended from: 'Promoting integrated transport, travel and communications across Blackpool' to 'Promoting integrated transport, travel and communications across Blackpool and to maximise ease of access to Blackpool'	Comment noted. The objectives have been re-drafted in the Revised Preferred Option to provide greater clarity, including this particular objective which is now objective 4 and includes reference to 'enable easier and sustainable journeys within Blackpool and the Fylde Coast'. This objective is supported primarily by policies CS5 (Connectivity), CS21 (Arrival and Movement) and CS22 (Key Resort Gateways) in the Revised Preferred Option.
0015	Bourne Leisure		With regards to the Spatial Objectives, Bourne Leisure considers that planning policy is needed to support the enhancement of existing tourism accommodation and facilities as well as new tourism developments. The wording of the second spatial objective should be amended accordingly.	Comment noted. Core Strategy policy supports new tourist development as well as important existing attractions and accommodation. The objective has been re-drafted in the Revised Preferred Option to state ' <i>including new high quality attractions</i> ' - it does not exclude existing attractions which are also seen as important to strengthen the resort appeal
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	Maintains its support for the Spatial Objectives, however, considers they could be strengthened. Further emphasis should be placed on delivering a sustainable integrated transport system and reference should also be made to supporting a reduction in the need to travel particularly via the	Support noted. The objectives have been re-drafted in the Revised Preferred Option to provide greater clarity and local distinctiveness, including this particular objective - which is now objective 4 - and references integrating transport systems and promoting sustainable modes of travel.

Resp No	Name/Company	Address	Comment	Council Response
0038	Natural England	Hornbeam House Electra Way Crewe Business Park, Crewe	private car. Support these objectives particularly objective 4.	Support noted.
0050	The Noble Organisation	1a Dukesway Court Team Valley Trading Estate Gateshead	Suggests that leisure and entertainment should be specifically identified to the objective under 'Sustainable regeneration, diversification and growth' as it is fundamental to achieving this objective. Under the 'maximising regeneration' objective, reference should be made to the traditional family based leisure offer that the resort depends on. Disappointed no reference is made to the important role amusement arcades play and that they should be supported and improved.	'Sustainable regeneration, diversification and growth' was the over-arching objective in the Preferred Option (now the overarching goal in the Revised Preferred Option). Agree that leisure and entertainment has a key role and this is reflected throughout the Core Strategy; including objectives 14 and 15 of the Revised Preferred Option. Their importance is fully understood and accepted, but it is not appropriate to identify more detailed specific uses such as amusement arcades, any more than many other important leisure attractions.
Spatial Vision				
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	Support the Spatial Vision of a New Blackpool to be delivered by the Core Strategy.	Comment noted.
0015	Bourne Leisure Ltd		Bourne Leisure supports the spatial vision for Blackpool. Suggests that reference should be made to Blackpool being the main tourism centre of the Fylde Coast.	Comment noted. Blackpool's tourism status is considered of national significance and this is strengthened in the re-drafted vision for the Revised Preferred Option.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	General support for the Vision. Welcomed the reference to providing safe and easy access through the provision of an integrated transport system, but recommended that this should be strengthened by referring to a 'sustainable' integrated transport system. This amendment	Support noted. The vision now includes reference to 'sustainable' integrated transport system.

Resp No	Name/Company	Address	Comment	Council Response
			would strengthen the sustainability credentials of the Vision.	
0031	Sport England	Building 3 Universal Square Devonshire Street Manchester	Supports the objective 'of meeting sport and recreational needs' under A Balanced Healthier and Greener Blackpool. However, recommend in light of this aim that that the vision is also altered to explicitly reference sport	Support noted. The vision now includes reference to 'sport'.
0035	Blackpool, Fylde & Wyre Economic Development Company		States the vision could better acknowledge the need to diversify Blackpool's economy placing slightly less emphasis on the visitor economy and more on growing vibrant, knowledge-based sectors for the future. Suggest that reference to 'state of the art conferencing facilities' is replaced with terms like 'modern' and 'contemporary'. States there needs to be more emphasis on people and skills	The vision references the importance of the visitor economy as well as a more diverse economy. The importance of economic diversification has been strengthened in the re-drafted vision to reflect this balance better. State of the art is replaced with the terms 'quality' and 'innovation'. The vision makes reference to skills and aspiration; which has been strengthened.
0038	Natural England	Hornbeam House Electra Way Crewe Business Park, Crewe	Do not consider enough is said about the natural environment. Vision should identify that all environments both urban and natural are conserved and enhanced.	Reference to the natural environment, climate change and sustainable development is strengthened in the re-drafted vision.
0046	Wyre Borough Council	Civic Centre Breck Road Poulton-le-Fylde	Suggest the opportunity is made to take a much more positive approach to the role of tourism and the resort, and to stress its national importance as the number one seaside resort in the UK. This could include a context map showing Blackpool's position within the UK and its accessibility from all corners of the country.	The Core Strategy recognises Blackpool's national tourism status; although it is agreed that including it in the vision would reinforce and this positive attribute.

Resp No	Name/Company	Address	Comment	Council Response
Spatial Vision/Objectives				
0058	North West Regional Development Agency	Renaissance House Centre Park Warrington	<p>Welcomes and supports the spatial vision and objectives however does not consider the separate vision set out in Chapters 5 and 6 to be necessary and suggest they are incorporated in the overarching spatial vision.</p> <p>Suggests that the word 'stable' is removed from the sentence 'Blackpool will have a stable and growing population' as the two words are contradictory.</p>	<p>Support noted. Whilst these separate visions describe specifically the aspirations for resort regeneration and supporting growth on the edge of Blackpool, it is agreed they should be brought together in one overarching spatial vision.</p> <p>Blackpool's circumstances of inner area decline, housing market imbalance, social and economic deprivation and high levels of transience, means there is a need to address these issues. In these terms, these aspirations are not contradictory. However, this will be articulated better in the re-drafted vision to avoid confusion.</p>

Chapter 4: The Spatial Strategy: Regeneration, Diversification and Growth

Resp No	Name/Company	Address	Comment	Council Response
Key Diagram				
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	<p>The area shown defined as ‘Inner Area Regeneration’ is rarely referred to elsewhere in the Core Strategy and where it is referred to it is not clear if this is specifically referring to this specific area of the town as it is never capitalised elsewhere in the document.</p> <p>The focus on Key Resort Gateways is supported. However, the three gateways referred to on the Key Diagram are all directed away from Pleasure Beach and South Beach. Request the inclusion of a fourth Key Resort Gateway from Yeadon Way to Pleasure Beach/South Beach, reflecting the importance of Pleasure Beach as an attraction within Blackpool and the need to enhance the visitor experience on arriving in Blackpool and travelling to this destination by car, public transport or on foot.</p> <p>Are pleased to see ‘Blackpool Pleasure Beach’ specifically identified on the Key Diagram. However, this does not appear to be carried through to any specific policies or objectives.</p>	<p>The Key Diagram reflects the main focus on Regeneration and Supporting Growth, however clarity on “inner area regeneration” will be provided in <i>Policy CS1: Strategic Location of Development</i> of the Revised Preferred Option. In addition the key and map will be amended to provide further clarification.</p> <p>Central Corridor is one of the key resort gateways referred to as a key strategic gateway to Blackpool. It includes Seasiders Way and car parking close to the Pleasure Beach and adjacent to the area defined as South Beach. The Core Strategy promotes improved vehicular and pedestrian linkages through the Corridor and improved parking and reception facilities; and this is considered sufficient to address this issue.</p> <p>The Pleasure Beach is identified on the Key Diagram reflecting its key role as an anchor attraction. Whilst there are no specific policies or objectives related to the Pleasure Beach itself, its overwhelming importance is integral to - and is recognised - in a number of policies, including leisure and business tourism (CS20) and arrival and movement (CS21).</p>
0036	Closelink Ltd		Consider the diagram should show the full extent of the suggested strategic allocations in both Blackpool and Fylde areas	The Key Diagram can only reflect strategic allocations within the Blackpool Borough. Allocations within Fylde will be determined by Fylde Council. Blackpool’s Core Strategy will need to align with the policy framework

Resp No	Name/Company	Address	Comment	Council Response
				of neighbouring authorities and the Council will co-operate with them on strategic planning issues as required by the Duty to Co-operate.
0038	Natural England	Hornbeam House Electra Way Crewe Business Park Crewe	Concerned regarding the lack of environmental data in the diagram. Would welcome revisions to show parks and green space, rights of way, designated sites, local nature reserves, and data from the Biodiversity Action Plan.	The Key Diagram focuses on the strategic priorities of the Core Strategy, including the broad locations that will be the main focus for strategic development. Some contextual information is included; and we will consider adding a layer to illustrate Blackpool's green infrastructure; although this must not detract from the strategic priorities. A separate green infrastructure map will be included in the Revised Preferred Option to provide more detailed information; in addition, this detail is shown on the Proposals Map.
0050	The Noble Organisation	1a Dukesway Court Team Valley Trading Estate Gateshead	Town Centre Leisure Frontage and Promenade Frontage should be shown on the key diagram.	The Key Diagram focuses on the strategic priorities of the Core Strategy. This includes the resort core and town centre. Whilst the Town Centre Leisure Frontage and Promenade Frontage are located within these areas, it is not appropriate to specifically show them on the Key Diagram. Furthermore, both the Town Centre Leisure Frontage and Promenade Frontage are shown on the Proposals Map.
Policy S1: Strategic Direction and Location of Development				
0001	Rashmi Pandav Blackpool Congregation of Jehovah's Witnesses	9 Lowthorpe Crescent Preston	In the paragraph commencing 'Tourism and leisure.....' Suggests the paragraph should expressly state the need for 'community facilities' Suggests reference is made to the secondary use of surplus/unused/derelict industrial or commercial land for community uses.	This is a key strategic policy which deals with the dual strategy focus on regeneration and supporting growth. Other policies adequately deal with the provision of community facilities including Policy CS11: Sustainable Neighbourhoods in the Revised Preferred Option. The Core Strategy proposes to continue to safeguard existing industrial / business land for employment uses due to the overriding shortage of employment sites in

Resp No	Name/Company	Address	Comment	Council Response
				the Borough. However, outside these defined areas, saved Policy DE4 of the Blackpool Local Plan (2006) permits the appropriate re-use of existing industrial buildings where this would result in wider environmental / community benefits; this could include community uses. New community uses are also promoted by a number of Core Strategy and saved Local Plan policies.
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	<p>Clarification required as to whether 'town centre and resort core' is a reference to Inner Area Regeneration on the adjacent Key Diagram. Suggest that 'town centre and resort core' in Policy S1 should be replaced with 'Inner Area Regeneration, as defined on the Key Diagram' to provide clarity to investors.</p> <p>This area should include the Pleasure Beach, which will be a major catalyst of resort regeneration.</p>	<p>The Key Diagram illustrates Policy S1 (re-numbered Policy CS1 in the Revised Preferred Option) and the dual strategy focus on regeneration and supporting growth. Both the key diagram and policy have been amended to provide clarity and the terminology used is now consistent.</p> <p>The Inner Area Regeneration focus comprises (amongst other things) the main resort attractions within the Resort Core, which includes the Pleasure Beach; and this is shown on the Key Diagram.</p>
0020	Lancashire County Council	County Hall PO Box 100 Preston	The overall approach is welcomed and reflects that set out in our response to the Issues and Options consultation. The success of the Core Strategy will be dependent on linking the regeneration of Blackpool's urban core to the planned growth at M55 Hub	Comment noted. Whilst the Revised Preferred Option no longer proposes housing on remaining lands at Marton Moss, it remains important to link the delivery of new development in South Blackpool with resort regeneration to create more sustainable housing markets, and provide a complementary offer to avoid competition within Blackpool's housing market.
0025	Mr John Ashworth	Runnell Farm Chapel Road Blackpool	The redevelopment of Inner Blackpool is supported and this can be assisted financially by a contribution from the developers at Marton Moss.	Comment noted. Whilst the Review Preferred Option no longer proposes housing on remaining lands at Marton Moss, it remains important to link the delivery of new housing development in South Blackpool with regeneration, including commuted sums payments.

Resp No	Name/Company	Address	Comment	Council Response
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	<p>Supportive of providing new development within the existing centre and resort core, where existing sustainable transport networks and services are already present and where the need to travel, particularly by private car is minimised.</p> <p>Has greatest concern in terms of the M55 Hub proposals for the sustainable accessibility of the area as it is currently poor and the scale of development proposed is likely to generate a significant number of trips, which given the sites proximity to Junction 4 of the M55, could be detrimental to the safe and efficient operation of the Strategic Road Network.</p> <p>Considers that it is even more critical that the potential impact of development is assessed and the delivery and requirements of infrastructure are determined to ensure that the strategy as a whole is not compromised by undeliverable and unsustainable strategic development.</p> <p>The Agency is aware of the modelling work being undertaken in order to test the development impact and consider the scale and type of associated transport provisions and expect that this information will be made available to review as soon as possible and particularly prior to consultation on the Publication draft.</p>	<p>Comments noted.</p> <p>The level of development now proposed at South Blackpool is reduced; and does not include any housing allocation on remaining lands at the Moss. A neighbourhood planning approach is now being promoted for the Moss which will support the retention and enhancement of the distinctive Moss character whilst identifying those circumstances where development may be acceptable.</p> <p>The Revised Preferred Option will be subject to a Sustainability Appraisal (SA) which will assess the potential individual and cumulative impacts of the level of development proposed. Infrastructure issues will be dealt with through the Infrastructure and Delivery Plan or the Duty to Co-operate.</p> <p>Notwithstanding the above, specific further work was undertaken to test the impact of various levels of development in South Blackpool in conjunction with the Highways Agency and Lancashire County Council.</p>
0033	National Grid		Support the identification of the M55 Hub as a focus for growth and expansion.	Noted. Lands at Junction 4 of the M55 will continue to be identified as a focus for sub-regional growth

Resp No	Name/Company	Address	Comment	Council Response
0036	Closetlink Ltd		<p>Fully support this policy specifically reference to the M55 Hub as a strategic location for growth and expansion.</p> <p>Cross boundary recognition should be made.</p>	<p>through the Duty to Co-operate.</p> <p>Noted. Lands at Junction 4 of the M55 will continue to be identified as a focus for sub-regional growth through the Duty to Co-operate.</p> <p>Reference is made to cross-boundary issues in the Introduction, Chapter 8, and Policy CS5: Connectivity (which focuses on key strategic improvements to the sub-regional transport network).</p>
0038	Natural England	Hornbeam House Electra Way Crewe Business Park Crewe	<p>Welcome a specific policy that directs development to particular parts of Blackpool.</p> <p>Broadly support policies to promote urban concentration. However, not supportive of policies that may lead to loss of urban gardens and other greenspace.</p> <p>The requirement for on site Public Open Space should only be relaxed where there is a clear plan to provide new open space in a suitably accessible location. Would welcome a link to the green infrastructure policy</p>	<p>Comment noted.</p> <p>Policy CS6: Green Infrastructure aims to protect, enhance, expand and connect green infrastructure and biodiversity networks in Blackpool; Policy CS7: Quality of Design requires new development to provide appropriate green infrastructure, including green spaces, landscaping and quality public realm.</p> <p>Comment noted. As the Core Strategy policies will be read as a whole and not in isolation, it is not necessary to repeat specific reference to green Infrastructure in this Policy.</p>
0050	The Noble Organisation	1a Dukesway Court Team Valley Trading Estate Gateshead	<p>State that the policy is too vague and should not be applied to frustrate the improvement of existing facilities.</p>	<p>The policy introduces the overarching dual strategy focus of the Core Strategy; further detail of this dual focus is provided in Chapters 7 (Regenerating Blackpool Town Centre and Resort Core) and 8 (South Blackpool Growth and Enhancement) which include policies to support the enhancement of existing facilities.</p>

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			All development needs to be realistic and deliverable.	The Infrastructure and Delivery Plan produced for the Pre-Submission document will address this issue.
0055	Gillian Wilsden	82 Withnell Road Blackpool	Concerned that there is very limited open space, and there is a danger that very soon Blackpool will have no green areas at all, and eventually there will be no distinguishing areas between destinations. Whilst I appreciate that more housing is required, it seems a shame that existing areas cannot be utilised instead of Green Belt disappearing for ever.	The Revised Preferred Option does not allocate any development on Green Belt or on the remaining undeveloped lands at Marton Moss. With respect to green open space, Policy CS6: Green Infrastructure aims to protect, enhance, expand and connect green infrastructure networks.
Policy S2: City of the Beach				
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	Clarification is required with regards to 'town centre', 'resort core' and 'inner area holiday and residential' with regards to the key diagram and the Pleasure Beach included in the 'resort core'. Supports the need to sustain a year round town centre and resort offer and the need for new attractions etc whilst support existing attractions and facilities.	This policy is now merged with Policy S1 (re-numbered Policy CS1 in the Revised Preferred Option). The Key Diagram illustrates Policy CS1 and the dual strategy focus on regeneration and supporting growth. Both the key diagram and policy are amended to provide clarity. The Inner Area Regeneration focus comprises (amongst other things) the main resort attractions within the Resort Core, which includes the Pleasure Beach; and this is shown on the Key Diagram. Support noted.
0015	Bourne Leisure Ltd		Whilst Bourne Leisure accepts the need to rebrand Blackpool, the company strongly considers that policies for regeneration, diversification and growth should recognise the importance of tourism outside those which are defined in Policy S2 and should recognise the contribution of these other areas to Blackpool's tourism profile and the local economy.	The focus of Policy S2 is on the town centre and resort core. Policy CS20: Leisure and Business Tourism recognises the value of outdoor leisure facilities away from the resort core, including the Marton Mere Caravan Park, which complement Blackpool's overall tourism offer.
0042	Mr Christian Cox	6 Ravenwood	Supportive of this policy. Wants to see a more	Support noted.

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		Avenue Blackpool	vibrant upmarket town for the 21st Century.	
0050	The Noble Organisation	1a Dukesway Court Team Valley Trading Estate Gateshead	Should recognise and support the traditional amusement offer which will continue to be a mainstay of the resort.	This policy provides an overarching spatial focus on the resort core and town centre. It is now combined with CS1 and includes reference to attractions. Further detail of this spatial focus is provided in other policies, including Policy CS20: Leisure and Business Tourism, which supports the improvement and enhancement of important existing tourist attractions. It is unnecessary and inappropriate to refer to specific attractions in either Policy. Furthermore, the important role of amusements is detailed in supporting text to Saved Policy RR4 of the Blackpool Local Plan (2006)
0052	North and Western Lancashire Chamber of Commerce	1-2 Lockheed Court Amy Johnson Way Blackpool	Raises concerns regarding the amount of funding required to deliver the transformational change set out in the Core Strategy.	Point noted. The impact of public funding priorities is recognised may impact on the scale of regeneration that can be delivered. The Core Strategy period is to 2027, and the aspiration remains to maximise such change. Market provision will potentially also increase with the pace of Blackpool's wider regeneration.
0054	Ms Vicki Gale	22 Alexandra Road Blackpool	Supports the objective however, states that it will require the quality of the connection between the town centre and the roads leading off to the front to be maintained. Concerned that this may not happen if key roads such as Crystal, Alexandra, Shaw and others are removed from the holiday area without a guarantee of alternatives to retain the quality of that link.	Support noted. Policy R17 (re-numbered CS22) focuses on the need for improvement and remodelling of key resort gateways leading to the town centre and seafront. Policies R18, R19, and R20 (re-numbered CS23 and CS24) aim to enhance the holiday accommodation offer in the resort; as well as manage change and restore confidence to create mixed residential and holiday neighbourhoods.
Policy S3: Housing Need				
0013	Blackpool LSP Environment Sub Group	Lutra House Dodd Way Walton Summit	Given that the regional housing targets have been scrapped with the cancellation of the Regional Strategy, the group question whether this level of	The main focus, in terms of housing numbers, is on regeneration and on sites within the existing urban area. The housing numbers have been reviewed and a

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		Preston	<p>housing provision to 2026 is still required. They raise concerns that the development industry will choose to develop the 'easy' (Greenfield) sites in preference to the regeneration of the urban core. Future housing provision must be delivered in accordance with Policy S4 to ensure that the regeneration of the urban core takes place.</p> <p>Would like to see a commitment that existing permissions and regeneration/SHLAA sites are developed before further development takes place at Marton Moss beyond 2016.</p>	<p>substantial reduction made to the proposed level of new housing in Blackpool following the Government's announcement of the proposed end of regional housing targets and this also reflects the realities of the current housing market.</p> <p>The level of housing development for the Moss set out in the Preferred Option is no longer being pursued by the Council.</p> <p>The Revised Preferred Option has been fully redrafted and no longer includes policy S4.</p>
0020	Lancashire County Council	County Hall PO Box 100 Preston	Provision for housing has been based on the annual provision set out in the revoked RSS. If these figures are to form the basis of the Core Strategy taken forward to examination stage, then they will to be supported by an appropriate evidence base.	The figures have been reviewed following the Government's proposed revocation of RSS housing targets and the revised figures are supported by an ongoing and updated evidence base.
0024	Hay Hill Ltd	18-22 Wigmore Street London	Concern raised in relation to the accuracy of draft housing figures which were contained in the now revokes NWRSS	The figures have been reviewed following the Government's proposed revocation of RSS housing targets and the revised figures are supported by an ongoing and updated evidence base.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	The Agency was previously supportive of delivering new residential development in line with RSS requirements and it is expected that whatever local housing target is taken forward, either based on existing provisions, reverting back to Option 1 Figures, or a new approach, that it is based on robust evidence and is commensurate with an identified level of need and able to be sustainably delivered.	The figures have been reviewed following the Government's proposed revocation of RSS housing targets. The revised figures are supported by an ongoing and updated evidence base.

Resp No	Name/Company	Address	Comment	Council Response
			<p>The Agency's main concern is that new housing development is sustainably accessible and is therefore generally supportive of providing new residential development within the Central Blackpool inner area, where there is best access to a variety of sustainable transport options, employment opportunities, services and facilities. The Agency is also supportive of focussing higher density housing development along the main sustainable transport corridors and at key transport hubs and interchanges.</p> <p>The proposal for 2,700 new dwellings at the M55 Hub provides greatest concern for the Agency given its proximity to the Strategic road network (SRN). The scale of housing proposed considered independently could have the potential to generate a significant number of trips and cumulatively with other proposals such as new employment opportunities, this is only going to exacerbate this issue. It is therefore important to ensure that any measures such as new or improved sustainable transport provisions or infrastructure are sufficient to accommodate or mitigate the potential cumulative impacts of development. The Agency will be able to provide further detailed comment as and when the traffic modelling work is made available for review.</p>	<p>The level of housing development for the Moss set out in the Preferred Option is no longer being pursued by the Council. The key emphasis in the Revised Preferred Option is that of maximising regeneration in the Inner Areas.</p> <p>Although the Council is no longer proposing the levels of housing on the Moss as for the Preferred Option, a traffic impact assessment was undertaken to test the impact of the development previously proposed in consultation with the Highways Agency and Lancashire Council.</p>
0031	Sport England	Building 3 Universal Square Devonshire Street	It is likely some potential locations and / or sites include playing fields or other land and buildings used for sport and recreation.	The requirements are noted in relation to the potential future development of all sites; however PPG17 has now been superseded by the National

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		Manchester	<p>Sport England emphasise here that PPG17 states that existing open space, sports and recreational buildings and land should not be built upon unless an assessment has been undertaken which has shown the land or buildings to be surplus to requirements, or replacement open space, sport or recreational facilities are provided. With regards to playing fields, PPG 17 and Sport England's Playing Field Policy oppose development of playing fields in the absence of a PPG17 compliant robust assessment of need unless the requirements of specific exceptions are met.</p> <p>The exact impact of the protection offered by PPG17 to locations identified in the core strategy and sites included within the various supporting studies is unclear without reviewing each individual site. Unfortunately, we do not have the resource to undertake such a task. In light of this, Sport England would make the point that some locations and sites which have been identified for development, say to meet employment or housing land requirements, might themselves need replacement provision, and that land requirements for such replacement provision should be made explicit either in the studies, and / or in broad terms in the core strategy.</p>	Planning Policy Framework.
0035	Blackpool, Fylde & Wyre Economic Development Agency		State the proposed figures appear to based on NWRSS 2008 requirements which have now been revoked. An alternative methodology will need to	The figures have been reviewed following the Government's proposed revocation of RSS housing targets and the revised figures are supported by an

Resp No	Name/Company	Address	Comment	Council Response
			be identified.	ongoing and updated evidence base.
0036	Closetlink Ltd		Fully support the inclusion of the M55 Hub as a strategic development site and the reference to the number of dwellings to be accommodated. However they re-iterate the cross boundary nature of the development.	Comment noted. The level of development now proposed at South Blackpool is reduced and does not include any housing allocation on remaining lands at the Moss. However, lands at Junction 4 of the M55 will continue to be identified as a focus for sub-regional growth; supported through the Duty to Co-operate which will address cross-boundary issues.
0037	Muse Developments Ltd		States that the Talbot Gateway redevelopment including an element of new housing will not only assist the Council in achieving its housing targets but will also contribute to achieving the wider objective of re-using Brownfield sites.	Comments noted.
0057	Government Office Northwest	City Tower Piccadilly Plaza Manchester	<p>Notes that Policy S3 includes a 1000 windfall allowance for conversions, for dwellings expected to be created as a consequence of Blackpool's declining guest house areas.</p> <p>PPS3 para 59 states that allowances for windfalls should not be included in the first 10 years of land supply unless LPAs can provide robust evidence of genuine local circumstances that prevent specific sites being identified.</p> <p>In these circumstances, an allowance should be included but should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends.</p> <p>We recommend that, if there are genuine local circumstances that prevent specific sites being</p>	The basis for a conversions windfall allowance is fully justified given the specific and unique characteristics of Blackpool's housing market. The allowance made has full regard to a detailed analysis of historic delivery rates and expected future trends, with evidence set out in Blackpool's Housing Monitoring Report and other supporting documents.

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			identified in years 5 to 10, you provide more justification, in line with PPS3 para 59.	
0058	North West Regional Development Agency	Renaissance House Centre Park Warrington	The Council will need to have regards the revocation of the RSS figures in restabilising the level of housing provision required.	The figures have been reviewed following the Government's proposed revocation of RSS housing targets and the revised figures are supported by an ongoing and updated evidence base.
0060	Mr M Evans Fylde Borough Council	Town Hall Lytham St Annes FY8 1LW	<p>RSSNW is no longer relevant and it is recommended that emerging policies be reviewed in light of the forthcoming national planning policy framework. There is an opportunity for Blackpool Council to review the level of growth it was striving to accommodate. In particular the revocation of top-down regional housing targets require housing need to be justified both locally and in a sub-regional context. This clearly has implications for the M55 Hub Growth Point.</p> <p>Policy S3 provides for 10,800 dwellings against a requirement of 10,200 dwellings. Whilst being mindful of Blackpool's tight boundary, there appears to be no justification for the uplift of 600 dwellings.</p>	<p>The figures have been reviewed following the Government's proposed revocation of RSS housing targets and the revised figures are supported by an ongoing and updated evidence base.</p> <p>With regard to the potential for wider development at the M55 Hub, the Core Strategy fully recognises this is a matter to be determined by Fylde Borough Council as part of its own evolving Core Strategy process and in accordance with the 'Duty to Co-operate. Reflecting the wider impact of the housing market downturn, as well as Fylde Borough Council's expressed concerns, the presentation of the revised and updated Blackpool Core Strategy proposals has been revised to much more clearly refocus the proposals on South Blackpool itself, as against reference to the "M55 Growth Point" in the Preferred Option document.</p>
Policy S4: Phased and Balanced Housing Market				
0020	Lancashire County Council	County Hall PO Box 100 Preston	<p>This approach is welcomed although it needs to be reflected in policy G5, which appears to suggest that affordable housing should be provided on site.</p> <p>Overall the relationship between the edge of</p>	<p>Comments noted. Policy G5 refers in the supporting text to the alternative of a commuted sum contribution in part or in full in lieu of on-site provision Further clarification has been made in Revised Core Strategy policy CS13 'Affordable Housing'.</p> <p>The main focus, in terms of housing numbers, is on</p>

Resp No	Name/Company	Address	Comment	Council Response
			town growth and urban regeneration needs to be set out further within the LDF, possibly through the proposed joint DPD with Fylde Council regarding the hub proposal.	regeneration and on sites within the existing urban area. The housing numbers have been reviewed and a reduction made to the proposed level of new housing in Blackpool following the Government's announcement of the proposed end of regional housing targets, and also reflecting the realities of the current housing market.
0026	Highways Agency		The Agency considers that in addition to phasing the future release of housing sites in accordance with Blackpool's dual focus on regeneration and growth, that new housing sites are appropriately phased and aligned with the delivery of new or improved infrastructure / sustainable transport provisions which are required to support the delivery of new housing sites. This is particularly essential for the new housing growth proposed for the edge of Blackpool and in particular at the M55 Hub strategic development sites where new physical infrastructure and improvements may be required (subject to the findings of the associated modelling work) and where new supporting sustainable transport provisions and other community facilities and services will need to be delivered to support the proposed housing growth.	This level of development is no longer being pursued by the Council in the Revised Preferred Option. The Council is no longer proposing housing development on Marton Moss/M55 Hub. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
0046	Wyre Borough Council		Consideration needs to be given to the phasing mechanism and how this relates to previously developed land indicative targets as identified in Table 7.1 of the adopted Regional Spatial Strategy. This is a joint indicative target of 65% between Blackpool, Fylde and Wyre, which should	As stated in the Preferred Option, it was recognised the 65% brownfield target was for the Fylde Sub-Region (Blackpool, Fylde and Wyre) as a whole. At the Examination in Public and following earlier representations on the Regional Spatial Strategy the figure of 65% was eventually determined having

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			<p>also be referenced as an indicator in section 8 (Delivery and Implementation Plan) of the Core Strategy.</p>	<p>regard to Blackpool’s circumstances of its limited choice of sites and constrained boundary. It was understood the percentage of brownfield development within Blackpool itself would potentially be below this level, counter-balanced by higher levels elsewhere in the Sub-Region.</p> <p>Notwithstanding the impending revocation of the RSS, Regeneration of inner Blackpool is a key priority for the Council as set out in Revised Preferred Option Policy CS1: Strategic Location for Development. Of the revised housing provision of 4500 new dwellings in Policy CS2, around 76 % is focused on brownfield including the Devonshire Road hospital site and other inner area regeneration sites.</p> <p>Properly planned greenfield development remains a key element towards meeting national housing needs, with development at Whyndyke within Blackpool sought to be developed as a sustainable urban extension to the existing urban area.</p> <p>The Government’s subsequent proposed revocation of RSS targets and the fact that development is no longer proposed for Marton Moss now also means that the level of proposed development on brownfield sites is expected to comply with the earlier RSS target – irrespective of its proposed revocation.</p>
0057	Government Office North West		<p>Regarding the 'phased potential' boxes on page 33, GONW would like to see an explanation of how the Council proposes to adhere to these</p>	<p>The main housing focus is on regeneration and sites within the existing urban area. Housing numbers have been reviewed and a substantial reduction made to</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>figures in order to maintain the dual focus of “regeneration and growth,</p> <p>What action will be taken if resort regeneration sites do not come forward as envisaged here, but Marton Moss sites do?</p> <p>Suggest it would be useful if more information were included in Policy S4 to explain how the dual focus aim will actually be implemented.</p> <p>A housing trajectory should be included in the Core Strategy.</p>	<p>proposed housing in Blackpool following the proposed end of regional housing targets and to reflect the realities of the housing market.</p> <p>The focus in the Revised Preferred Option is on seeking to ensure a complementary mix and financial support between the range housing on the Moss House Road and Whyndyke sites and regeneration sites, which represent different dimensions of Blackpool’s need for new housing. The redirection of developer contributions and New Homes Bonus will support inner area development.</p> <p>Core Strategy policy represents a realistic way forward to support an appropriate mix of housing to meet Blackpool’s needs.</p> <p>A housing trajectory will be included in the Core Strategy Pre Submission version based upon the housing monitoring update to be undertaken in 2012.</p>
0060	Mr M Evans Fylde Borough Council		On page 33 queries why the three phasing boxes total to 8,600 over the period 2011 - 2026 when the requirement expressed in the trajectory above is 8,000 dwellings over the same period.	The difference in these figures relates to the total ‘requirement’ (in line with RSS) as against the projected delivery of the Policy S3 sites (which included some flexibility over and above these figures). These figures have now all be revised in the Revised Preferred Option in line with the Government’s proposed revocation of RSS.
Policy S5: Employment Development and Economic Diversification				
0010	Mr Alan Marshall	Foxes Farm Flat 7 Fairfield Road	Suggests there is a need to include specific ideas to re-balance and grow the local economy sustainably.	Comments noted. Policy CS3 ‘Economic Development and Employment’ of the Revised Preferred Option supports sustainable economic development to grow

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		Poulton-le-Fylde	<p>Puts forward idea to expand food products, processing and distribution industry.</p> <p>Suggests Council needs to develop mechanisms to attract existing companies and encourage start-up businesses through imaginative land development/lease schemes and low business rates.</p>	<p>the local economy and support a more balanced employment market. Supporting text identifies opportunities for securing inward investment through partnership working. Any further detail, in terms of identifying which economic sectors Blackpool should target for expansion, which could include food processing, and mechanisms for actively encouraging inward investment are more appropriate to be covered by an Economic Strategy / Action Plan.</p>
0011	Blackpool Airport Ltd	Squires Gate Lane Blackpool	<p>States that the Airport is fundamentally important as a key driver of the local and sub regional economy and should be given greater acknowledgement in the Core Strategy.</p> <p>Text should be amended to refer specifically to the fundamental importance of the Airport on the economy rather than 'another' driver of the economy.</p> <p>The policy should specifically refer to the merits and opportunities which development at the Airport will bring to the economy.</p>	<p>Blackpool Airport is recognised in the supporting text as a key driver in supporting the sub-regional economy; and that employment growth opportunities on lands around the airport will be critical in capitalising on this asset. Reference to future growth and development of the Airport is made in the supporting text to Policy CS23 'South Blackpool Employment Growth' and the Council is working with the Airport, Fylde Borough Council and other stakeholders to identify appropriate opportunities.</p>
0026	Highways Agency	City Tower Piccadilly Plaza	<p>Generally supportive of the approach to focus new employment development towards the town centre, whilst safeguarding and enhancing existing employment sites.</p> <p>Raises some concerns, particularly with regards to expanding employment opportunities at the M55 Hub. The Agency appreciates the sustainability benefits of co-locating housing and employment</p>	<p>Comment noted.</p> <p>The level of development now proposed at South Blackpool is reduced; and does not include any housing allocation on remaining lands at the Moss. The Revised Preferred Option will be subject to a</p>

Resp No	Name/Company	Address	Comment	Council Response
			development, particularly with regards to reducing the need to travel, given the scale of development proposed and its proximity to the SRN, the cumulative impact of the proposals at the M55 Hub could potentially be detrimental to the operation and safety on the network. As referred to in response to Policy S3, the traffic modelling work currently being undertaken is likely to provide further evidence regarding the specific impact of the proposed developments and the Agency will be able to provide further detailed comment as and when it or its findings are made available for review.	Sustainability Appraisal (SA) which will assess the potential individual and cumulative impacts of the level of development now proposed. Notwithstanding the above, specific work was undertaken to test the impact of various levels of development in South Blackpool in conjunction with the Highways Agency and Lancashire County Council.
0033	National Grid		Support this policy as it promotes the M55 hub as a main focus for securing new employment generation development of previously undeveloped land.	Comment noted. Whilst the level of development now proposed at South Blackpool is reduced; lands at Junction 4 of the M55 will continue to be identified as a focus for sub-regional growth through the Duty to Co-operate.
0037	Muse Developments Ltd		Agree with focusing development at Talbot Gateway as a means of strengthening the Town Centre and also assisting to meet the wider objectives of delivering the employment development needs of Blackpool. Support the statement that the Talbot Gateway forms a 'critical component' of Town Centre regeneration.	Comments noted.
0052	North and Western Lancashire Chamber of Commerce	1-2 Lockheed Court Amy Johnson Way	Reference to potential for growth in the civil service and public sectors may need to be revised in light of the current financial spending constraints.	The supporting text has been revised to reflect this – but while funding cuts may adversely impact on current opportunities, there remains potential for longer term growth, including possible further

Resp No	Name/Company	Address	Comment	Council Response
0054	Ms Vicki Gale	Blackpool 22 Alexandra Road Blackpool	There needs to be a skills and jobs strategy to accompany the Core Strategy. There will be a need for diverse smaller, good quality residential units to make Blackpool vibrant and prosperous. There is a need to attract the volume of public/Government or private sector investment. New homes need to be appealing to a higher skills and professional market - such as has fuelled regeneration in Manchester. Without it there is a risk the properties the Council may acquire could become poor-quality HMOs.	Government office relocation. The Revised Preferred Option refers to a Local Economy Action Plan being developed which will identify priorities to grow the local economy and improve employment prospects for Blackpool's residents. A future Economic Strategy for Blackpool or the Fylde Coast (currently in draft format) would also cover these issues. The Core Strategy emphasis on housing regeneration proposals is focused on improving the inner area housing offer, uplifting quality, and conversely seeking to reduce the numbers of poor quality multi-rented properties.
0057	Government Office North West	City Tower Piccadilly Plaza Manchester	The evidence base will need to provide full justification for the requirement for 70 hectares of new employment land to 2026. Note that around 50 ha of the combined requirement figure is to meet joint needs around the M55 Hub on the edge of Blackpool on lands in Fylde. Asks where the supply is for the remaining 20 ha is envisaged.	The Revised Preferred Option no longer proposes a combined requirement of future employment land for Blackpool and lands on the urban edge within Fylde; it proposes a revised figure to meet Blackpool's needs and this is justified in the supporting text and separate Employment Technical Paper produced in May 2012. Due to Blackpool's geographical constraints and shortage of development land, the Policy focuses on strengthening existing assets, including Blackpool town centre and existing employment locations; and recognises the important role of lands on the edge of Blackpool in Fylde (identified as a sustainable location for sub-regional economic growth) as contributing towards meeting future longer term needs. This reliance on lands outside the borough boundary is dependent on the co-operation with neighbouring Fylde through the Duty to Co-operate.

Resp No	Name/Company	Address	Comment	Council Response
				A Fylde Coast Sub-Regional Employment Land Statement has been revised and updated for the three authorities of Blackpool Fylde and Wyre.
0058	Northwest Regional Development Agency	Renaissance House Centre Park Warrington	Supporting text to this policy refers to the combined requirement of 70 hectares of employment in Blackpool and Fylde however the policy itself does not quantify the scale of provision within Blackpool.	The Revised Preferred Option no longer proposes a combined requirement of future employment land for Blackpool and lands on the urban edge within Fylde; it proposes a revised figure to meet Blackpool's needs and this is justified in the supporting text and separate Employment Technical Paper produced in May 2012.
0060	Mr M Evans Fylde Borough Council		<p>The lowercase text to Policy S5 includes reference to 'a combined Blackpool/Fylde requirement of 70 ha of new employment land of which around 50 hectares are required to meet needs around the M55 Hub on the edge of Blackpool on lands in Fylde'.</p> <p>These figures are not agreed as set out in correspondence previously. The Fylde Coast MAA includes an aspiration to work towards joint employment provision at the M55 Hub, but this has not been agreed through the LDF process, nor established that Fylde Borough Council will meet its own employment land needs in this location. It is not the role of Blackpool's Core Strategy to plan for lands in Fylde.</p>	<p>It is fully recognised that allocations within Fylde will be determined by Fylde Council; and that Blackpool's Core Strategy will need to align with the policy framework of neighbouring authorities and the Council will co-operate with them on strategic planning issues as required by the Duty to Co-operate.</p> <p>The Revised Preferred Option no longer proposes a combined requirement of future employment land for Blackpool and lands on the urban edge within Fylde; it proposes a revised figure to meet Blackpool's needs and this is justified in the supporting text and separate Employment Technical Paper produced in May 2012. Due to Blackpool's geographical constraints and shortage of development land, as well as focusing on strengthening existing assets, including Blackpool town centre and existing employment locations, the Policy recognises the important role of lands on the edge of Blackpool in Fylde (identified as a sustainable location for sub-regional economic growth) as contributing towards meeting future longer term needs. This reliance on lands outside the Borough</p>

Resp No	Name/Company	Address	Comment	Council Response
				boundary is dependent on the co-operation with Fylde Borough Council through the Duty to Co-operate.
Policy S6: Quality of Place				
0013	Blackpool LSP Environment Sub Group	Lutra House Dodd Way Walton Summit Preston	Support Policy S6. Open space provide opportunities for wildlife and to reduce habitat fragmentation. Recognition of the intense urban nature and lack of countryside emphasis. Need to protect/ and enhance Blackpool's ecology / habitat.	Comment noted. This is now incorporated in policy CS6 of the Revised Preferred Option 'Green Infrastructure'.
0013	Blackpool LSP Environment Sub Group	Lutra House Dodd Way Walton Summit Preston	Concerned with the term 'as far as practicable' within the statement on landscape and biodiversity in Policy S6. Feel that this is too vague and does not commit to the conservation of biodiversity. Also raises concerns that the desk top survey work already undertaken is insufficient to identify what needs to be done to protect and enhance the biodiversity on the Moss.	Comment noted. This is now incorporated in policy CS6 'Green Infrastructure'. This level of development is no longer being pursued by the Council with the emphasis now being on supporting the retention and enhancement of Marton Moss.
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	Support this policy which aims to improve the quality of Blackpool's environment for residents and visitors. However, the reference to the need for design and access statements in the second paragraph is not necessary as these are a statutory requirement.	Comment noted. Reference to design/ access statement will be amended accordingly.
0017	English Heritage	Suites 3.3 and 3.4 Canada House 3 Chepstow Street Manchester	Support the preparation of Character Area Appraisals with reference made to Blackpool's historic Townscape Characterisation.	Support noted. The Revised Preferred Option will promote the conservation and improvement of Blackpool's Built Heritage through Policy CS8.
0020	Lancashire County	County Hall	The main area of growth at the M55 Hub is	Comment noted. This level of development is no

Resp No	Name/Company	Address	Comment	Council Response
	Council	PO Box 100 Preston	promoted on the basis that it will provide green infrastructure through the provision of SUDS and other open spaces.	longer being pursued by the Council with the emphasis now being on supporting the retention and enhancement of Marton Moss.
0023	Environment Agency	Lutra House PO Box 519 Preston	Are uncomfortable with the term 'as far as practicable' within the statement 'ensuring new developments as far as practicable retain and provide appropriate new landscape and biodiversity benefits'. Would like the policy to be rephrased to state 'Ensuring new developments retain and provide appropriate new landscape and biodiversity benefits.'	Policy CS6 'Green Infrastructure' of the redrafted Core Strategy aims to protect existing green infrastructure. Any loss of green infrastructure will only be acceptable in exceptional circumstances where it is allowed for as part of an adopted DPD or where provision is made for appropriate compensatory measures, mitigation or replacement.
0034	Head of Heritage		Supports the policy particularly where it acknowledges that heritage contributes to 'quality of place' Suggest reference could be made stating : 'Protecting, conserving and enhancing the heritage in line with World Heritage principles'	Comment noted. The Revised Preferred Option will promote the conservation and improvement of Blackpool's Built Heritage through Policy CS8.
0038	Natural England	Hornbeam House Electra Way Crewe Business Park Crewe	Fully support this policy. Welcome references to high standards of design, enhancing the local distinctiveness, retaining and enhancing biodiversity in new development, sustaining and enhancing biodiversity, safeguarding Blackpool's identity and preventing merger with neighbouring settlements and safeguarding, improving and creating an enhanced network of GI. Does the Council have a strategy for development of GI that can feed into the Core Strategy and be more explicit? Can specific sites be identified for conservation, enhancement or inclusion in the GI network? Again a link to the later GI policy would be helpful here.	Comment noted. The Revised Preferred Option will promote biodiversity and Green Infrastructure through Policy CS6. The saved policies of the Blackpool Local Plan and the LDF Proposals Map form part more explicitly identify specific conservation sites.

Resp No	Name/Company	Address	Comment	Council Response
			<p>Comment that geodiversity has been omitted from the Core Strategy. Consider that the Core Strategy would not meet soundness tests.</p> <p>Indicators identified for this policy include the number of listed buildings, conservation areas and characterisation studies. The number on its own does not represent the quality or condition of such areas and we would welcome further development of indicators to include a condition assessment.</p>	<p>This has been incorporated into policy CS6 'Green Infrastructure'.</p> <p>Comment noted. The indicators have been reviewed in the Revised Preferred Option.</p>
0047	Lancashire Wildlife Trust	The Barn Berkeley Drive Preston	Query the use of the Indicator 'Changing biodiversity of safeguarded conservation sites' as it is extremely ambiguous in its current wording. We assume that the indicator means improved biodiversity but changing biodiversity could mean a decline, so we would suggest that the wording be amended to reflect the Council's true intent.	Comment noted. This indicator has been amended to reflect the AMR Core Indicator.
Policy S7: Climate Change and Sustainable Development				
0010	Alan Marshall	Foxes Farm Flat 7 Fairfield Road Poulton-le-Fylde	Supports the use of sustainable energy generation in particular CHP. Suggests the Delivery and Implementation Plan needs to be developed in this area to include more specific ideas.	Comments noted. The Delivery and Implementation Plan has been updated in the Revised Preferred Option. It highlights the indicators that the Council will monitor to support this policy (now CS9 – Energy Efficiency and Climate Change).
0013	Blackpool LSP Environment Sub Group	Lutra House Dodd Way Walton Summit Preston	Extremely supportive of this policy.	Comment noted.
0020	Lancashire County	County Hall	The requirement in the supporting text for	Comment noted.

Resp No	Name/Company	Address	Comment	Council Response
	Council	PO Box 100 Preston	<p>recycling facilities to be incorporated into new developments and the uptake of wider waste minimisation measures is supported.</p> <p>There may be benefit in referring applicants to the Lancashire Minerals and Waste Development Frameworks supplementary planning document on Minimising and Managing our Waste in New Developments. Given this, community recycling facilities could be explicitly mentioned in Policy P01 Planning Obligations</p>	<p>Reference is now made in policy CS9 'Energy Efficiency and Climate Change' of the Revised Preferred Option.</p> <p>Community recycling facilities have been added to Policy CS10 'Planning Obligations' of the Revised Preferred Option.</p>
0023	Environment Agency	Lutra House PO Box 519 Preston	Supportive of this policy	Comment noted.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	<p>Generally supportive of this policy, but suggests that consideration should be given to the environmental implications of transport and in particular that associated with traffic congestion. The Agency considers that the sustainable location of development and effective traffic management can help to reduce the need to travel, particularly by private car, which would not only help to reduce congestion but also the resultant carbon emissions as a consequence.</p>	<p>Comment noted.</p> <p>Policies CS5 'Connectivity' and CS11 'Sustainable Neighbourhoods' of the Revised Preferred Option support this principle.</p> <p>The choice of development locations within Blackpool is limited, both in terms of redevelopment opportunities, available land, and its tightly constrained boundary. The Core Strategy focus is on inner area regeneration, where opportunities to reduce the need to travel are maximised.</p>
0038	Natural England	Hornbeam House Electra Way Crewe Business Park Crewe	<p>Would welcome a stronger policy that:</p> <p>Promote low carbon technologies alongside renewables;</p> <p>Develops a criteria based policy in line with PPS22,</p>	The policy has been significantly re-drafted in the Revised Preferred Option and is now policy CS9 'Energy Efficiency and Climate Change'. It refers to the incorporation of energy efficiency measures and decentralised and renewable or low-carbon energy

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			<p>and consider identifying suitable areas for renewable and low-carbon energy sources, and supporting infrastructure; Plan for a proportion of the energy supply of new development to be secured from A target would also be useful here to provide a means of monitoring progress.</p> <p>Suggests the policy could be expanded to include sustainable building practices and clear guidance of the Council's requirements in respect of new developments towards meeting clear targets, such as the Code for Sustainable Homes.</p> <p>Would welcome Sustainable Drainage matters being explicitly included in the policy wording rather than just in the supporting text.</p> <p>Would also welcome links here to sustainable living, GI and links to active and healthy lifestyles through walking, cycling, sustainable transport, etc.</p>	<p>sources.</p> <p>In line with the recommendations of the AECOM Climate Change and Renewable Energy Study, further clarification will be provided in relation to the 15% reduction in CO₂ emissions, with specific reference made to energy efficiency measures, and the incorporation of on-site low carbon and renewable technologies and directly connected heat. Policy CS9 of the Revised Preferred Option identifies the requirements for developments to relevant Code for Sustainable Homes. Reference is also made to the promotion of secondary and recycled materials in new developments.</p> <p>Now included in policy CS9 of the Revised Preferred Option.</p> <p>The focus of the climate change policy is on sustainable resource management and is complemented by Policy CS5 'Connectivity' which promotes sustainable transport and development, and by wider policies on Green Infrastructure and sustainable neighbourhoods in the Revised Preferred Option.</p>
0057	Government Office North West	City Tower Piccadilly Plaza Manchester	Note that Policy S7 states that the Council will ensure that development proposals incorporate renewable energy sources in appropriate new developments. Recommend that consideration needs to be made to the feasibility of setting out,	Comments noted and in line with the recommendations of the AECOM Climate Change and Renewable Energy Study, clarification has been provided in policy CS9 in relation to the 15% reduction in CO ₂ emissions, with specific reference made to

Resp No	Name/Company	Address	Comment	Council Response
			in the Core Strategy, a target percentage in line with the provisions of PPS1.	energy efficiency measures, and the incorporation of on-site low carbon and renewable technologies and directly connected heat.
Policy S8 - Connectivity				
0008	Ms Angelia Hinds	21 Moss House Road Blackpool	Asks where funding will be provided for improvements to rail links and local bus services identified in the Core Strategy.	The various schemes that were set out in Policy S8 are key strategic improvements to the sub-regional transport network which will be supported and pursued by Blackpool Council. The Government has announced plans for rail improvements. Funding for other schemes will be dependent on the success of grant bids and future central Government funding decisions. Funding of local level improvements to bus, cycle and pedestrian networks will in part be funded by future major development proposals.
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	<p>Support all of the schemes listed within this policy; however object to the policy as currently worded.</p> <p>The following schemes should be promoted within the Core Strategy:</p> <p>'No loss of car parking in the Yeadon Way/Central Corridor or in the car parks in the vicinity of Blackpool Pleasure Beach, and the implementation of environmental improvements in and around these car parks'</p> <p>Improvement of links between Yeadon Way/Seasiders Way and Blackpool Pleasure Beach, either through the use of the railway alignment between Blackpool South and</p>	<p>Comments noted.</p> <p>The schemes set out in Policy S8 related to key strategic improvements to sub-regional transport infrastructure. Specific reference to enhancement focused on the town centre and resort core was made in the supporting text to Policy S8 and in Policy R4. These have now been rewritten for the Revised Preferred Option and comprise policy CS5 'Connectivity', CS21 'Arrival and Movement and CS22 'Key Resort Gateways'.</p> <p>Reference is made to providing high quality and conveniently located car parking provision in Policy CS21 of the Revised Preferred Option Consistent with wider enhancement and improvements, a policy setting out no loss of parking along the Corridor</p>

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			Blackpool Pleasure Beach stations or by the improvement of the main pedestrian routes between the main car parks and Pleasure Beach'	<p>cannot realistically be committed in the Core Strategy. Changes in parking provision need to be considered as part of an overall parking strategy to accommodate visitor and resident needs related to all forms of travel, which is to be prepared by the Council.</p> <p>The fourth bullet of the supporting text on "Quality of Arrival" in Policy R4 generally addressed this issue.</p> <p>The Revised Preferred Option has been amended with the Central Corridor also identified as a key strategic gateway to Blackpool within the amended "Key Resort Gateways" with improved links within and across the area. Improved connectivity between the Central Corridor, the seafront, Blackpool Pleasure Beach and adjoining areas is also promoted.</p>
0015	Bourne Leisure		Whilst Bourne Leisure recognises the overall objective of improving Blackpool's connectivity and reducing car travel, it should be recognised that there is often no feasible alternative to the private car for reaching tourist-related developments including holiday parks in more remote and/or rural areas. The approach taken in policy R4 is therefore preferred.	Comment noted. As recognised in Policy R4, maximising both visitor numbers and the ease and quality of their arrival and movement is essential for Blackpool.
0020	Lancashire County Council	County Hall PO Box 100 Preston	<p>Welcomes the references to the upgrading of the rail gateways and improvements to the north and south gateways.</p> <p>Reference should be made to the M55 Hub and how connectivity will be addressed by means other than car.</p>	<p>Comment noted.</p> <p>The reduced housing numbers in Blackpool, and uncertainty about the future development of wider lands in Fylde do not support specific reference in</p>

Resp No	Name/Company	Address	Comment	Council Response
			Consideration should therefore be given to future development of Blackpool Airport within this policy.	<p>Policy S8. Policy M7, which specifically relates to the M55 Hub, sets out the need to develop a comprehensive public transport improvement strategy, and to optimise pedestrian and cycle connectivity between homes, jobs, and supporting community facilities.</p> <p>Blackpool Airport itself is outside of the Blackpool boundary, and its future development is a matter for Fylde Borough Council as Local Planning Authority. Reference to the future development of the Blackpool Airport Corridor is considered in the context of the revised South Blackpool focus of the Core Strategy.</p>
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	<p>Generally supportive of the proposed schemes, particularly with regards to the key strategic sustainable transport improvements, such as to the main rail and tram gateways and lines.</p> <p>However, the Agency notes that there are no bus related improvements identified. The supporting text states that there needs to be a strong emphasis placed on increasing use of the bus and also promotes the provision of a high quality bus network. However, this does not appear to be reflected in the policy. This gap should be addressed as the provision of sustainability to many of the proposed developments / areas of development are likely to be best served by extended, enhanced or new bus services.</p> <p>Welcomes in the supporting text the need for the</p>	<p>Support noted.</p> <p>A further bullet will be added which fully reflects the emphasis required to high quality bus network improvements.</p> <p>Support noted.</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>integration of development and transport in order to support economic growth and reduce the need to travel by car and welcomes the promotion of delivering a modal shift from car borne visitors to the use of public transport such as coach and rail.</p> <p>In relation to the stated improvements at the A585(T), the Agency considers that further clarification should be provided as to the detail of the scheme. The Agency presumes that this relates to those improvements being delivered through the Thornton AAP DPD of the Wyre LDF, however if this is not the case, further details for the scheme should be provided to the Agency.</p>	Comment noted.
0033	National Grid		Supports this policy and the need to improve north-south links to and from the M55. Supports measures to enhance sustainable transport patterns and improvement to connectivity and which will be essential to the success of the M55 hub.	Comments noted
0037	Muse Developments Ltd		Supports this policy and believe that the Talbot Gateway scheme can assist the Council in its aim of improving and creating connectivity through the creation of a new transport interchange and alteration at Blackpool North station.	Comment noted.
0038	Natural England	Hornbeam House Electra Way Crewe Business Park Crewe	Welcomes this policy; however it makes no mention of bus and coach transport. Again, if the Council has evidence to plan for particular routes they should be included in the Core Strategy.	Point accepted. A further bullet will be added which fully reflects the emphasis required to high quality bus network improvements.
0044	Sustrans	St Pauls Centre	In favour of the public transport improvements	Support noted.

Resp No	Name/Company	Address	Comment	Council Response
		Hightown Crewe	for rail, and the tramway and connecting the two modes of transport. Would also like to see the Council continuing with its Cycle Town Demonstration work.	
0058	North West Regional Development Agency	Renaissance House Centre Park Warrington	The supporting text to this policy and the delivery and implementation plan provides little information as to how the transport schemes identified in the policy are going to be delivered. Further clarification required.	Point noted and the Infrastructure and Delivery Plan will provide further information.
0060	Mr Mark Evans Fylde Borough Council	Town Hall Lytham St Annes	<p>Page 42, Policy S8 refers to the tramway extension in its 5th bullet point. The associated lowercase text does not however provide sufficient explanation as to what this is likely to entail, nor does it demonstrate the strong spatial linkages with Fylde. If this is the SINTROPHER project which is being referred to then further explanation is needed. The same can be said for the 6th bullet point of Policy S8, which refers to the 'Blue Route'.</p> <p>Page 43, para 4, refers to poor rail access to Fleetwood. Whilst this is true as it is non existent, was this statement intended?</p>	<p>Further clarification will be provided within the supporting text to Policy S8 and in the Infrastructure and Delivery Plan being prepared in conjunction with the Core Strategy.</p> <p>Reference is relevant given the longer term potential for the re-opening of the rail link to Fleetwood.</p>
General Comments				
0058	North West Regional Development Agency	Renaissance House Centre Park Warrington	Suggest consideration is given to moving policy R1 to Chapter 4 and substituting R1 in place of S2 as there appears to be some overlap.	The Revised Preferred Option is Resort Renaissance and City have now been removed but the content of the policies is now contained in

Chapter 5: Town Centre and Resort Renaissance

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The Vision				
0034	Head of Heritage		<p>Supportive of the vision and reference made to major heritage assets, The historic significance of the Promenade should be identified as the main artery of the resort.</p> <p>Mention should be made to the first phase improvement planned for the Winter Gardens and Tower.</p>	<p>Comment noted. Whilst the Vision for the Town Centre has now been incorporated into the overarching Core Strategy Spatial Vision, reference to heritage assets including the Promenade, Tower and Winter Gardens remains.</p> <p>This is referred to in the Heritage Policy (re-numbered CS8 in the Revised Preferred Option), the Winter Gardens Policy (CS17) and will also be included in the supporting Infrastructure and Delivery Plan.</p>
Policy R1: Resort Renaissance				
0012	Blackpool Holiday Trades Association	Queen Victoria Hotel 60 Station Road Blackpool	Supports the inner regeneration strategy and the need to reinvigorate the adjoining holiday and residential neighbourhoods. Pleased that the major new development projects at the Tower and Winter Gardens will be implemented through the Core Strategy.	Comment noted.
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	<p>We strongly support the inclusion of this policy. However, to be effective, we would suggest the following amendments:</p> <p>Reference to Blackpool's resort and town centre core to be clarified. This is similar to a number of other designations used,</p>	<p>Comment noted.</p> <p>Clearer and consistent reference to the Town Centre and Resort Core will be set out in the Key Diagram and in the Revised Preferred Option.</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>but again differs and is not referred to in the Key Diagram. The Pleasure Beach should fall within this area.</p> <p>The second bullet point refers to identifying and promoting opportunities for major new attractions and visitor accommodation focussed on the town centre and core of the resort. Again, this designation should be clarified, ideally with reference to the Key Diagram, and the Pleasure Beach should fall within this area.</p> <p>The supporting paragraphs refer to the 'resort core' and 'inner areas', which are undefined.</p> <p>The Pleasure Beach does, however, support the focussing of investment and development in the resort core, where the Pleasure Beach is included within this area.</p>	<p>The town centre, resort core and inner area regeneration focus, as shown on the Key Diagram, does include the Pleasure Beach, and will be amended to reflect this.</p>
0015	Bourne Leisure Ltd		<p>State that Policy R1 should not apply only to the resort and town centre core but also to the wider resort area. It is particularly important in this regard that holiday parks such as Marton Mere that are situated outside of these narrowly defined areas have a positively worded policy context within which to promote</p>	<p>The focus of Policy R1 and Section 5 is on the town centre and resort core strategic focus for change and development, but the value of supporting tourist facilities elsewhere is fully recognised which complement attractions and accommodation in the resort core.</p> <p>Policy CS20 – Leisure and Business Tourism of the Revised Preferred Option recognises and reflect</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>their enhancement and where appropriate, their expansion.</p> <p>Identify the need for a new policy in the Core Strategy which applies to existing holiday parks and which would both help to address the identified need for investment and reflect the positive economic benefits of reinvestment.</p>	<p>the importance of other sites outside the resort core, and include specific reference to the Marton Mere Caravan Park.</p> <p>Policy CS20 – Leisure and Business Tourism identifies and embraces a wide ranging focus to support the future regeneration and development of the resort. It is not considered there is any requirement for a separate policy for holiday parks.</p>
0021	Ms Anne Frith	Runnell Cottage Chapel Road Blackpool	Encouraged to see improvements to the Town Centre. Would like to see improvements to the traditional character properties.	Comment noted.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	Generally supportive of the approach proposed to regenerate the resort and town centre core, particularly as a location to support major development opportunities, given its general sustainability credentials, existing infrastructure and sustainable transport provisions and the provisions of Policy R4: Arrival and Movement.	Comment noted.
0034	Head of Heritage	Blackpool Council	Supports this policy. Pleased to see reference is made to heritage and its role in maintaining the towns distinctive character.	Comment noted.
0050	The Noble Organisation	1a Dukesway Court Team Valley Trading Estate Gateshead	Supports the safeguarding and enhancement of long standing attractions and building on the resorts heritage however, suggests specific	Comment noted. Policy R1 provided the overarching Core Strategy policy for the renaissance of the resort. Policy CS20 of the Revised Preferred Option 'Leisure and Business

Resp No	Name/Company	Address	Comment	Council Response
			mention should be made to those facilities that define these features such as Coral Island.	Tourism' supports the improvement and enhancement of existing tourist attractions. No mention is made of the Tower, Piers or other specific attractions in this policy, and it is inappropriate and unnecessary to do so.
0058	North West Regional Development Agency	Renaissance House Centre Park Warrington	Suggests that R1 provides a more appropriate strategic policy framework for the resort and town centre than Policy S2 Delivery partner should not be identified as the NWDA.	These sections have been redrafted and restructured in the Revised Preferred Option. Reference to NWDA as a "delivery partner" will be deleted.
Policy R2: Conference, Events and Festivals				
0015	Bourne Leisure Ltd		Supportive of this policy.	Comment noted.
0028	The Theatres Trust	22 Charing Cross Road London	Supports the content of this policy with no further comments.	Comment noted.
0034	Head of Heritage	Blackpool Council	Supports the policy, however would like to see specific reference to the Winter Gardens' historical significance.	Support noted. Specific reference to the important need to capitalise on the historic legacy of the Winter Gardens is included Policy CS17 'Winter Gardens' and Policy CS8 'Heritage'.
0042	Mr Christian Cox	6 Ravenwood Avenue Blackpool	Although agrees that there is a place for conference trade Blackpool, it should be ancillary rather than the centrepiece. Supportive of new events and festivals.	Support noted. Policy CS20 'Leisure and Business Tourism' sets out Blackpool's continued involvement in conferencing which remains an important part (but not a centrepiece) of the resort's appeal. The Winter Gardens and supporting hotel based conference facilities provide a distinctive Blackpool offer.
Policy R3: Resort Heritage				
0025	Mr John Ashworth	Runnell Cottage Chapel Road Blackpool	With good guidelines in place Blackpool should be able to accommodate groups of young people (such as on stag and hen	Comment noted.

Resp No	Name/Company	Address	Comment	Council Response
			weekends) and families side by side. Prefers traditional seaside fun in the future of Blackpool than Casinos.	
0034	Head of Heritage		Supports this policy but would like to see reference to Blackpool's current World Heritage Status bid reflecting the Council's commitment. Also like reference to completion of characterisation studies for whole borough.	Comment noted. The Core Strategy is fully supportive of exploiting the principles of Blackpool's mass appeal as the world's first seaside resort but the Council's unsuccessful bid is not relevantly specifically referred to in the Core Strategy.
0050	The Noble Organisation	1a Dukesway Court Team Valley Trading Estate Gateshead	The first bullet point should be amended to recognise the important role of existing major attraction such as Coral Island.	The Resort Heritage policy focuses on the older and iconic listed buildings and predominantly Victorian origins of many of the resort's entertainment facilities. It makes no specific reference within the policy to particular attractions, and it would not be relevant to include specific reference to Coral Island in this policy.
Policy R4: Arrival and Movement				
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	Support this policy, subject to amendments. The reference to 'providing sufficient, high quality parking to support the retail and wider economy' should be amended to state: 'providing sufficient, high quality and conveniently located parking to support retail, major visitor attractions and the wider economy, with no loss of spaces where parking serves the main resort core'.	The general focus of Core Strategy policy is to provide sufficient high quality parking, and it is not realistic or appropriate to include a specific statement that there will be "no loss of spaces where parking serves the main resort core" The Council promotes the provision of high quality, conveniently located parking supporting the town centre and resort economy, This issue of 'increased

Resp No	Name/Company	Address	Comment	Council Response
			<p>The supporting text on Quality of Arrival does not fully reflect the issues faced by operators of attractions.</p> <p>Accessibility from Yeadon Way to South Beach and the Pleasure Beach needs to be identified as a significant issue with a clear commitment to address it.</p> <p>Supports the general strategy to minimise cross town movements by locating car parks at main arrival points into the resort and town centre but direct access from Yeadon Way to car parks in the vicinity of Pleasure Beach and an improved visitor experience for pedestrians are much needed</p> <p>Unsure whether the reference to approximately 2,000 spaces at central corridor is an increase or a decrease over current capacity. Objects to any decrease</p>	<p>parking at Blackpool Pleasure Beach', and other parking issues will be dealt with in more detail within the council's proposed parking strategy. The aim is to ensure optimal provision for visitors and residents by a range of modes of travel, as part of a coordinated strategy which best addresses and eases access and movement for all.</p> <p>Revised policies 'Arrival and Movement' and 'Key Resort Gateways' generally addresses these issues.</p> <p>The reference to 2,000 spaces on the central corridor relates to the area to the south of the town centre/ Chapel Road and is in line with the existing level of provision. The reference has been</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>to this level of parking and would ask that the existing level of parking is protected, with improved pedestrian links.</p> <p>Request part of the policy is reworded so that the council promotes: 'increased parking both at and within walking distance of Blackpool Pleasure Beach and improved links to parking in the Central Corridor'.</p>	<p>removed from the Core Strategy as it is felt more appropriate to be dealt with by the proposed parking strategy.</p> <p>As above, reference is specifically made to the support for the provision of high quality, conveniently located parking and improved connectivity with the Pleasure Beach which reflect this point.</p>
0015	Bourne Leisure Ltd		Support is given to this policy however it is necessary for some visitors to be car borne in order to access the more remote tourist attractions/facilities.	Comment noted.
0044	Sustrans	St Pauls Centre Hightown Crewe	Supports public transport proposals and improvements for residents and visitors. Suggest that changes need to be made to Blackpool North Station to make it more attractive and easily accessible by foot or bike.	Comments noted.
Policy R5: Blackpool Town Centre Strategy				
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	Suggests clarification of the first bullet point. This states that Blackpool town centre will be the location for 'all major retail development'. Requests rewording this to: 'it being the location for all major non-tourism retail development'. This will allow for Pleasure Beach to continue to widen its appeal and extend the periods in which it is open.	Strengthening the retail offer with new retail development is a fundamental part of the Council's strategy for Blackpool Town Centre; and this approach is consistent with the retail hierarchy (Policy CS4: Retail) which identifies the Town Centre as being the focus for major retail development (in line with national policy). This does not prevent appropriate supporting retail development elsewhere, with Policy CS4 setting

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				out the approach for retail provision across Blackpool.
0020	Lancashire County Council	County Hall PO Box 100 Preston	<p>In principle, the location of all major retail proposals and the development of office space within the town centre is welcomed and in line with PPS4.</p> <p>They note that the evidence on which the Town Centre Strategy is based consists of the Roger Tym and Partners: Preston Tithebarn Study which is yet to be published.</p> <p>State that consideration should be given to reduce the 20 policies or combining some of these policies or referring to future or existing DPD's.</p>	<p>Support noted.</p> <p>The revised Fylde Coast Retail Study embraces this evidence and is being published and made available with the Revised Preferred Option.</p> <p>Policies R5, R6, R9, and R11, and also Policies R12 – R16 of the Preferred Option have been combined/reduced, reflecting this point.</p>
0028	The Theatres Trust	22 Charing Cross Road London	Supports the content of this policy - no further comments.	Support noted.
0030	Sainsburys Supermarkets Ltd		Supports this policy, particularly the aspiration to strengthen the prime retail area of the town centre.	Support noted.
0035	Blackpool, Fylde & Wyre Economic Development Company		<p>The wide boundary for the area could mitigate against the commerciality of achieving the stated aspirations for Blackpool Town Centre.</p> <p>Suggest an alternative approach consolidating the area around genuine</p>	<p>It is proposed to amend the town centre boundary so that all three strategic sites (Winter Gardens, Central Business District and Leisure Quarter) are included within the town centre; to help drive economic growth and enable the sites to integrate more closely with the town centre.</p> <p>Delivering the three strategic sites will act as a catalyst for further regeneration, investment and</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>existing opportunities in the short to medium term whilst retaining the longer term aspirations. Greater clarity regarding the priority, phasing and character of development of the key sites could help address this issue.</p> <p>A robust regime for neighbourhood and streetscape management is critical to achieving the spatial aspirations for Blackpool Town Centre.</p>	<p>development within the town centre; complementing and supporting development the principal retail core and the commerciality of the town centre as a whole. The Infrastructure and Delivery Plan published for the Pre-Submission document will provides further information on the priority, phasing and character of development of these strategic sites.</p> <p>Point agreed. The supporting text to the Town Centre Policy refers to a Town Centre Strategy being developed; this will identify appropriate management measures and accountability.</p>
0037	Muse Developments Ltd		Supports the potential contribution that the redevelopment of Talbot Gateway could have on the Town Centre. Consider that the delivery of Talbot Gateway will assist in attracting increased numbers of visitors to the Town Centre and the creation of new jobs.	Support noted.
Policy R6: Prime Retail Area				
0037	Muse Developments Ltd		Support the inclusion of Talbot Gateway in the Town Centre boundary. Clarity is required for the Principal Retail Core as its boundary is not clearly defined.	Comment noted. This policy has now been incorporated into policy CS16 of the Revised Preferred Option. The boundary of the principal retail core remains as shown in the saved policy of the existing adopted Local Plan and will be shown for information on the revised Town Centre plan in the Core Strategy.
0042	Mr Christian Cox	6 Ravenwood Avenue Blackpool	Supportive of this policy. Would like to see improved retail provision, promotion of the night time economy.	Comment noted.

Resp No	Name/Company	Address	Comment	Council Response
0050	The Noble Organisation Ltd	1a Dukesway Court Team Valley Trading Estate Gateshead	Principal retail core is ill defined in figure 7 and should show the frontages it relates to.	The boundary of the principal retail core remains as shown in the saved policy of the existing adopted Local Plan and will be shown for information on the revised Town Centre plan in the Core Strategy.
Policy R7: Winter Gardens Strategic Site				
0034	Head of Heritage	Blackpool Council	Suggest reference should be made to the fact that the Winter Gardens are the most complete Victorian all weather complex in the world.	Amendment made in line with comment.
0028	The Theatres Trust	22 Charing Cross Road London	Supports the content of this policy with no further comments.	Comment noted.
0042	Mr Christian Cox	6 Ravenwood Avenue Blackpool	Supports the re-use of the Winter Gardens and would particularly like to see a mixed use retail/leisure/entertainment use similar to the Printworks in Manchester.	Comment noted, with mixed use the focus of the Winter Gardens Policy.
0050	The Noble Organisation Ltd	1a Dukesway Court Team Valley Trading Estate Gateshead	The policy refers to potential use for a casino. States that Blackpool has no right under current legislation to any casino licenses and there can be no reasonable prospect during the life of the Core Strategy and therefore the reference to casino use should be deleted.	There is no proposal for casino use. The Winter Gardens policy refers to a range of potential uses for which development may be permitted. The legislation referred to relates to regional casino developments and, whether or not this is reviewed, there remains potential for a local casino as part of a wider multi-purpose complex, which it remains relevant to include as part of a wide range of potential uses.
Policy R8: Talbot Gateway Town Centre Strategic Site				
0008	Ms Angelia Hinds	21 Moss House Road Blackpool	Asks if any alternative proposals will be put forward for Talbot Gateway if government funding is no longer available.	The substantial progress to date in assembling the site and developing the proposals for the Talbot Gateway/CBD has led to major developer interest in the site. First phase major development will

Resp No	Name/Company	Address	Comment	Council Response
				come forward to provide the foodstore, council offices and supporting development. The pace and extent of further phases will follow but their timing and precise format will be subject to review.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	The Agency is generally supportive of the redevelopment of the Talbot Gateway site to provide a mixed use strategic site capable of accommodating new major office and residential development, and supporting retail and community facilities. The Agency particularly welcomes that this development would be underpinned by an improved public transport interchange and gateway at the station, providing improved sustainable connectivity within and to outside of the Borough.	Comment noted.
0030	Sainsburys Supermarkets Ltd		Supports the aim of the Council to provide Talbot Gateway as an anchor to the development of the northern Town Centre redevelopment.	Comment noted.
0037	Muse Developments Ltd		Supports this policy, however, raises concerns with its wording. Request the re-wording of the policy from 'will include' to 'may include' to provide flexibility in the future. Suggest that figure 8 is misleading as it is only an indicative phasing plan. The phasing of the development will be	Comment noted. The balance and precise mix of uses set out to be incorporated in the development very accurately reflects the strategy for the site, but not all elements will be as readily deliverable as others. To this extent, reflecting this point, the wording has been amended. Figure 8 is stated is only an indicative phasing plan. This will be removed in the Revised Preferred Option.

Resp No	Name/Company	Address	Comment	Council Response
			considered in more detail at the reserved matters application stage.	
0042	Mr Christian Cox	6 Ravenwood Avenue	Strongly supports this policy but disappointed to see that the bus station will not be demolished as part of the scheme.	Comment noted. Scheme viability would not support redevelopment. The bus station will be subject to a major facelift to transform its current appearance and impact, so it can become an asset to rather than constraint on wider development.
Policy R9: St John's, Abingdon Street and the Lanes				
0025	Mr John Ashworth	Runnell Cottage Chapel Road Blackpool	Supportive Blackpool Town Centre's 'café culture' and would like to see this in South Shore.	Comment noted. This policy has now been removed and incorporated in the Town Centre policy in the Revised Preferred Option.
0042	Mr Christian Cox	6 Ravenwood Avenue Blackpool	Supports this policy, particularly the reuse of the Post Office.	Comment noted. This policy has now been removed and incorporated in the Town Centre policy in the Revised Preferred Option.
Policy R10: Former Central Station/Promenade Town Centre Strategic Site				
0008	Ms Angelia Hinds	21 Moss House Road Blackpool	Asks if there are any alternative proposals put forward in the event of funding becoming unavailable to relocate the courts and police station.	<p>The two elements both require major and costly relocations, and will very much depend on the successful marketing and extent of developer interest in the future provision of a major new landmark attraction on the central station site. If the funding (public and private) required to enable such relocation is not forthcoming, the alternative in terms of these uses is that they will remain in their current location.</p> <p>There are no current proposals for the central station site. Substantial publicity has been given to the potential for a major new leisure development, and the Council has signed an 'exclusivity agreement' to enable the prospective developer to undertake a detailed viability assessment of the</p>

Resp No	Name/Company	Address	Comment	Council Response
				<p>proposal.</p> <p>The Council has prepared a development brief Supplementary Planning Document (SPD) to set out further details of the Council's requirements for the future development of the site – whether in terms of the current developer interest or, alternatively, as part of a wider remarketing of the site in accordance with the requirements of Policy R10.</p> <p>Other alternative options were set out in the Core Strategy Preferred Option, but the Council's focus of any future development remains in accordance with Policy R10, now Policy CS19 of the Revised Preferred Option.</p>
0016	Brunswick Property Development Ltd	209 Church Street Blackpool	<p>Many sites fronting the Promenade already represent a vibrant family orientated leisure offer.</p> <p>The approach from the Town Centre to the football ground to central car park is in need of regeneration as a priority</p> <p>Comment that some of the buildings within this site are relatively new and their replacement is not necessary</p>	<p>The policy focus is to “provide compelling new reasons to visit Blackpool”. As such the transformation sought is one which would enhance Blackpool's appeal to visitors, and complement and support its existing attractions.</p> <p>The regeneration need for the improvement of the approach to the site is fully recognised and supported in the Arrival and Movement and Connectivity policies in the Revised Preferred Option.</p> <p>No proposal can be progressed without full consultation and discussion with all landowners, which is vital to progress further development of</p>

Resp No	Name/Company	Address	Comment	Council Response
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	without any discussion with landowners. Given the general sustainable nature of the Former Central Station site, the Agency has no particular concerns regarding its redevelopment for major new leisure attractions provided that the proposals in Policy R4 help to ensure good sustainable transport connectivity to and from the site.	the site. Comment noted.
0032	Silcock Leisure (Northwest) Ltd	Pier Forecourt Promenade Southport	States that it is important to ensure that this new comprehensive development is well integrated into other attractions in the area and does not provide a one stop destination to visitors to the detriment of other Promenade businesses. Silcocks would not wish to see any redevelopment which includes or replicates those leisure facilities which are already available within Fun Palace and the Carousel. Further, Silcocks would not want any expansion of their own business be prejudices by the Councils future proposals for the Central Station Site.	Comment noted. The whole policy focus is to “provide compelling new reasons to visit Blackpool” and “physically and functionally integrate the site” with the adjoining town centre shopping and seafront uses. As such the transformation sought is one which would enhance Blackpool’s appeal to visitors, and complement and support its existing attractions.
0035	Blackpool, Fylde and Wyre Economic Development Company		State the policy needs to take account of the ongoing work to develop a Planning Brief for this site.	The policy has been updated to reflect the now adopted Planning Brief SPD.
0042	Mr Christian Cox	6 Ravenwood Avenue	Supportive of the redevelopment of this	Comment noted.

Resp No	Name/Company	Address	Comment	Council Response
		Blackpool	site for a major tourist attraction rather than a conference centre. Does not support option R10A.	
0050	The Noble Organisation	1a Dukesway Court Team Valley Trading Estate Gateshead	<p>Supports the general aim of major leisure development subject to it:</p> <ul style="list-style-type: none"> a) not competing with existing businesses and attractions b) physically integrating with existing leisure attractions c) maintaining good access and car parking <p>First bullet of policy should be amended to ' . . . Ensuring new facilities do not undermine existing' (attractions)</p> <p>Second bullet should be amended to say 'where necessary' at the end of the sentence.</p> <p>Third bullet: 'requiring full integration with Coral Island.</p>	<p>Comment noted.</p> <p>The whole focus of Policy R10 (now Policy CS19 of the Revised Preferred Option) is to “provide compelling new reasons to visit Blackpool” and “physically and functionally integrate the site” with the adjoining town centre shopping and seafront uses. As such the transformation sought is one which would enhance Blackpool’s appeal to visitors, and complement and support its existing attractions.</p> <p>Policy R4 (now policy CS21 of the Revised Preferred Option) similarly set out the essential need to provide ease of access between all key resort and town centre facilities, supported by sufficient and high quality parking and gateway arrival facilities.</p> <p>The intents of the second and third bullets are similarly part of the strategic focus of Policy R10. It is unnecessary to specifically refer to Coral Island which is an important part of the seafront and town centre, which are directly referred to in the policy.</p> <p>In these terms, it is not considered relevant to make these further qualifications to the policy.</p>

Resp No	Name/Company	Address	Comment	Council Response
Policy R11: Town Centre Promenade Leisure Frontage				
No Comments Received.				
Policy R12: Resort Neighbourhoods				
0001	Mr Rashmi Pandav Blackpool Congregation of Jehovah's Witnesses	9 Lowthorpe Crescent Preston	Suggest that 2nd bullet point should include 'associated Community Facilities'.	The focus of Policy R12 (now CS11 'Sustainable Neighbourhoods') was on creating a better balanced community in the resort neighbourhoods with higher quality holiday accommodation and a better mix of housing. The wider essential components of a better quality of life in the priority neighbourhoods is relevantly set out in Policy G1, (now CS11 of the Revised Preferred Option) includes reference to the provision of an appropriate, high quality of community facilities.
0025	Mr John Ashworth	Runnell Cottage Chapel Road Blackpool	Supports the reduction in bed spaces.	Comment noted.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	<p>Previously provided comments on consultation drafts of the Foxhall AAP and South Beach AAP.</p> <p>It was generally considered that both areas benefited from good accessibility from public transport, in particular via bus and tram and would be supportive if these linkages were to be enhanced to improve sustainable accessibility for local residents, workers and visitors.</p> <p>Based on the level of information provided in the drafts and the supporting</p>	Comments noted. The Council is no longer pursuing the AAPs for North Beach, South Beach and Foxhall.

Resp No	Name/Company	Address	Comment	Council Response
			documents, it was not possible to determine any specific impacts resulting from the proposals and whilst it is unlikely that individual proposals within the AAPs would have a significant impact on the safety or operation of SRN, it was advised that consideration should be given to the cumulative impact of the developments proposed across the resort and the AAP areas.	
Policy R13: Rigby Road Strategic Site				
0007	Mrs P Hawkins	14 Dunes Avenue Blackpool	Suggest that the Rigby Road strategic site would be suitable for a residential development with a mixture of family, social and affordable housing.	The Rigby Road site was previously put forward in the Core Strategy Preferred Option when it was proposed and fully envisaged it would be redeveloped for the relocation of the main Blackpool and Fylde College campus. In the absence of Government funding, a substantial focus for regeneration of the site will be on residential development. It is not now considered to be a 'Strategic Site'.
0016	Brunswick Property Company Ltd	209 Church Street Blackpool	The principle of regenerating this area is supported as it currently represents a poor approach to the town. The Council's efforts should be targeted in this area.	Comment noted.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	The Agency recognises that the site is generally sustainable in nature and well located in terms of good public transport accessibility and therefore utilising the site for strategic development presently should not be a concern.	Comment noted.
0035	Blackpool, Fylde and		This site could be identified within the	In the absence of Government funding, which

Resp No	Name/Company	Address	Comment	Council Response
	Wyre Economic Development Company		context of a wider opportunity including adjacent sites such as the former gas works and the tram depot. The core strategy will be important in promoting future mixed-use development of the site.	originally provided the fundamental reason for its earlier identified designation, the Rigby Road site will not specifically be defined as a strategic site with detailed boundaries in the revised edition of the Core Strategy. The policy will be retained and amended to more broadly relate to the wider opportunities which exist on this site and adjoining land to promote future mixed use development of this area, in line with this comment.
0057	Government Office North West	City Tower Piccadilly Plaza Manchester	Comment that the policy does not contain sufficient information regarding the proposals for the site beyond the rather vague intention to comprehensively re-develop it. The supporting text sheds no further light on this.	The Rigby Road site was proposed as a strategic site in the Core Strategy Preferred Option when it was envisaged it would be redeveloped for the relocation of the main Blackpool and Fylde College campus. The Government's 2010 decision ended hopes of funding and the basis for this proposal, and it is accepted the subsequent late amendment provided insufficient information to justify its continued identification, and it will not be defined as a strategic site in the revised Plan.
0059	Karen Taylor	Themis Chambers Suite 14067 145-147 St Johns Street London	Raises concerns this site could be sold as a hotel development.	<p>Comment noted. No decision has been taken on the future development of the site, but the focus is expected will be on residential use as part of a wider mixed use development of the site and adjoining lands.</p> <p>There are no proposals and no need for further major new hotel development at this location, with the focus of future provision remaining on the town centre and main holiday areas closer to the seafont.</p>

Policy R14: Foxhall Resort Neighbourhood

Resp No	Name/Company	Address	Comment	Council Response
0024	Hay Hill Ltd	18-22 Wigmore Street London	<p>The aspiration to comprehensively improve, redevelop and transform this 'declining resort area' to a thriving mixed use neighbourhood is welcomed. However, the Council has recently refused applications inconsistent with this statement.</p> <p>Queries the sentence referring to the Council 'seeking substantial redevelopment and a transformation of other parts of Foxhall. This is at odds with the Foxhall Preferred Option which refers to 'comprehensive improvement'.</p> <p>R14 should allow for individual conversions/developments in the current economic climate.</p>	<p>Comment noted. The Council's priorities have now changed with regards to Foxhall. The Council is no longer pursuing an AAP for the area. The relevant policies in the Revised Preferred Option are CS11 'Sustainable Neighbourhoods' CS24 'Off Promenade Holiday Accommodation'</p> <p>Reference to substantial redevelopment related to the continuing aspiration for new housing. Current proposals are being progressed for redevelopment at Tyldesley Road, but in the absence of wider funding Policy R14 has been replaced by a more broadly based policy in the Revised Preferred Option placing emphasis on the continued need for comprehensive improvement and change across the wider neighbourhoods.</p>
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	Based on the level of information provided in the Foxhall AAP, it was not possible to determine any specific impacts resulting from the proposals and whilst it is unlikely that individual proposals within the AAP would have a significant impact on the safety or operation of SRN, it is advised that consideration should be given to the cumulative impact of the developments proposed across the borough.	Comment noted. The Council is no longer pursuing an AAP for the Foxhall area.
0034	Head of Heritage	Blackpool Council	Support this policy	Comment noted.
0040	Mr A Coldwell	6 Coop Street	Considers this area to be an eyesore in	Comment noted. Major redevelopment potential is

Resp No	Name/Company	Address	Comment	Council Response
		Blackpool	need of regeneration. Suggests the redevelopment of the entire area with the retention of two heritage streets that would be utilised as a working Victorian Museum.	limited by market realities, and viability issues. The identification of Yorkshire Street and Bairstow Street as part of the Foxhall Village Main Holiday Accommodation Area, (in accordance with Policy R19 – now CS24 in the Revised Preferred Option) provides a basis to capitalise on their Victorian heritage, whilst seeking to deliver high quality accommodation and meets the needs of today's visitor.
0041	Mr David Wilmot	225 Central Promenade Blackpool	Concerned regarding the uncertainty of plans in Foxhall and lack of funding for regeneration.	Current proposals are being progressed for redevelopment of Tyldesley Road and were approved in January 2011 by the Council, which provide clarification of the current redevelopment priority and focus of the Council. In the absence of wider funding Policy R14 has been replaced by a more broadly based policy in the Revised Preferred Option placing emphasis on the continued need for comprehensive improvement and change across the wider resort neighbourhoods.
0057	Government Office North West	City Tower Piccadilly Plaza Manchester	Clarification required to confirm whether the Neighbourhood Plans is (or will be) Development Plan Documents.	In the context of new national planning policy including the Localism Act, and constraints with funding, the future of neighbourhood planning in these areas remains a priority, but the appropriate way forward will be through supporting Supplementary Planning Documents or potentially through community led plans. Reference in policy CS11 of the Revised Preferred Option only generally refers to neighbourhood plans.
0058	North West Regional Development Agency	Renaissance House Centre Park Warrington	The area is unclear on the key diagram. A more detailed map should be provided.	Policy R14 has been replaced by a more broadly based neighbourhood policy in the Revised Preferred Option and places emphasis on

Resp No	Name/Company	Address	Comment	Council Response
				continuing improvement and change across the resort and inner area neighbourhoods. With no current certainty in terms of the future preparation of a Foxhall Neighbourhood Plan, it is inappropriate to include a more detailed Foxhall plan, but an inset plan will be included in the revised Core Strategy showing the defined wider inner area boundary and resort neighbourhoods.
Policy R15: South Beach Resort Neighbourhood				
0012	Blackpool Holiday Trades Association	Queen Victoria Hotel 60 Station Road Blackpool	<p>Comments that whilst some of the hotel accommodation in the area may be described as 'low quality', much of it is not. The quality of the accommodation is mixed and it is mixed throughout the neighbourhood. Poor quality accommodation is not concentrated in one place.</p> <p>Raise concerns about current proposals to 'de-zone' part of the neighbourhood, as this area targeting would blight some good quality accommodation.</p> <p>Suggest that reducing the amount of holiday accommodation should be implemented on the basis of one-to-one negotiations with owners, rather than changing the status of whole blocks of</p>	<p>It is accepted the quality is mixed, with a range of accredited accommodation across the resort which will continue to be supported and remain an important part of Blackpool's overall holiday accommodation offer.</p> <p>Policies R18 - R20 (these have been replaced by policies CS23 and CH24 in the Revised Preferred Option) set out the overall focus of Core Strategy policy to enhance and improve the quality of holiday accommodation across the resort neighbourhoods. The proposals have no impact on the existing use of properties, but provide the basis for decisions on future planning applications to support a mix of holiday and housing uses.</p> <p>There is a need to reduce the amount of holiday accommodation and to promote and manage change in the holiday areas. The detailed application of these policies is set out in the Supplementary Planning Document (adopted</p>

Resp No	Name/Company	Address	Comment	Council Response
			streets. Suggest s process of gradual renewal combining small scale redevelopment and refurbishment could deliver a neighbourhood which has a complementary mix of good quality holiday accommodation and a diversified, higher quality housing stock.	March 2011) on Holiday Accommodation which has been subject to full public consultation in parallel with the Core Strategy and defines the boundaries of the main holiday accommodation areas. The emphasis elsewhere remains on uplifting holiday accommodation, but also provides businesses the flexibility to convert to quality residential use. Further supporting guidance approved by the Council sets out required new standards to ensure higher quality conversions.
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	Support the policy. However, consider that the fifth bullet point should be reworded. Its current wording is: 'Improved connectivity between the Central Corridor lands, seafront and adjoining areas' This should be amended as follows: 'Improved connectivity between the Central Corridor lands, seafront, Pleasure Beach and adjoining areas, and no loss of existing parking capacity'. Fourth paragraph of the supporting text makes reference to South Beach being a strategically located 'gateway' to the town and resort. Consider that South Beach is itself a destination for visitors	Comments noted. Policy R14 has been replaced by a more broadly based neighbourhood policy in the Revised Preferred Option (CS11) which continues to place emphasis on the need for regeneration and change. Policy CS22 of the Revised Preferred Option 'Key Resort Gateways' fully recognises the importance of the central corridor and its connectivity to adjoining areas. The policy recognises and identifies the Central Corridor as a key strategic gateway to Blackpool from the M55, with reference to improved links and enhancements required. Reference to the important role of improved parking at the Central Corridor is made in the revised Key Resort Gateways policy.

Resp No	Name/Company	Address	Comment	Council Response
			<p>travelling to Blackpool via the M55/Yeadon Way and Blackpool South and should therefore be identified as such in the supporting text.</p> <p>It needs to be made clear that parking south of Waterloo Road supports the South Beach attractions and that development proposals must retain at least the same level of parking or enhance provision. It should also state that the Council will support proposals which improve the linkages between this parking area and Pleasure Beach. Such improvements would increase the usage of the parking areas and enable increased investment to improve its appearance.</p> <p>This policy may also be an appropriate place to make specific reference to the aspirations for the further development and enhancement of Pleasure Beach, with reference to the designation on the Key Diagram. The following wording is suggested</p> <p>“Although well established, the future development and success of Pleasure Beach will have a major direct impact on the ability of Blackpool to refresh its offer and continue to act as a mass tourism</p>	<p>Policy CS20 ‘Leisure and Business Tourism’ of the Revised Preferred Option highlights the importance of the existing tourist attractions and that the Council will support future improvement and enhancement.</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>destination.</p> <p>“Development at and adjoining Pleasure Beach that would complement the main amusement park use would create significant regeneration benefits for Blackpool as a whole, particularly as the continuing success of Pleasure Beach is central to the ongoing attractiveness and viability of Blackpool as a visitor destination. It will also help to secure the long term financial viability and sustainability of the amusement park and create significant operational benefits, as well as employment opportunities for local residents within any new facilities.</p> <p>“Complementary tourism-related development (primarily entertainment and leisure, tourism retailing and accommodation) is necessary to create a more dynamic international destination that will appeal to a wider range of visitors (i.e. across wider social classes and wider geographical area) for larger proportions of the year.”</p> <p>The Core Strategy should specifically recognise the following:</p> <ul style="list-style-type: none"> • The flexibility for BPB to 	

Resp No	Name/Company	Address	Comment	Council Response
			<p>enhance the range of attractions on the site to enable it to compete with other regional and national attractions (such uses to include amusement park rides and attractions, entertainment, retail, hotel, casino, food and drink); and</p> <ul style="list-style-type: none"> • A transport strategy that promotes improved linkages between Pleasure Beach and the central car parking corridor and facilitates an increase in off-site car parking in the vicinity of Pleasure Beach and other South Beach attractions. 	
0012	Blackpool Holiday Trades Association	Queen Victoria Hotel 60 Station Road Blackpool	Concerned that the development of the South Shore District Centre is too focussed on Waterloo Road and Lytham Road. The statement should be changed to read 'Waterloo Road, Lytham Road and Bond Street', to reflect the definition of the centre in the 2009 Issues and Options Report of the evolving Neighbourhood Plan. Fully support the proposal to enhance the District Centre as the commercial heart of the area.	Comment noted. The policy has now been integrated with other policies in the Revised Preferred Option in policy CS11 'Sustainable Neighbourhoods'. Policy CS4 'Retail and Town Centre Uses' identifies South Shore District Centre in the retail hierarchy. The detailed boundaries of all Local and District Centres will be re-assessed in the Site Allocations and Development Management DPD.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	Based on the level of information provided in the South Beach AAP, it was not possible to determine any specific impacts resulting from the proposals and whilst it is unlikely that individual proposals within the AAP would have a	Support noted. The Council is no longer pursuing the South Beach AAP.

Resp No	Name/Company	Address	Comment	Council Response
			significant impact on the safety or operation of SRN, it is advised that consideration should be given to the cumulative impact of the developments proposed across the borough.	
0057	Government Office North west	City Tower Piccadilly Plaza Manchester	Clarification required to confirm whether the Neighbourhood Plans are (or will be) Development Plan Documents.	In the context new national planning policy including the Localism Act, and with constraints on funding, the future neighbourhood planning of these areas remains a priority, but the appropriate way forward will be through supporting Supplementary Planning Documents (SPDs), or potentially through wider based community led plans. Reference in the revised Core Strategy will accordingly only generally refer to neighbourhood plans.
0058	North West Regional Development Agency	Renaissance House Centre Park Warrington	The area is unclear on the key diagram. A more detailed map should be provided.	Policy R15 has been replaced by a more broadly based neighbourhood policy in the Revised Preferred Option and places emphasis on continuing improvement and change across the resort and inner area neighbourhoods. With no current certainty in terms of the future preparation of a South Beach Neighbourhood Plan, it is inappropriate to include a more detailed South Beach plan, but an inset plan will be included in the revised Core Strategy showing the defined wider inner area boundary and resort neighbourhoods.
Policy R16: North Beach Resort Neighbourhood				
0057	Government Office North West	City Tower Piccadilly Plaza Manchester	Clarification required to confirm whether the Neighbourhood Plans are (or will be) Development Plan Documents.	In the context of new national planning policy including the Localism Act, and with constraints on funding, the future neighbourhood planning of these areas remains a priority, but the appropriate

Resp No	Name/Company	Address	Comment	Council Response
				way forward will be through supporting Supplementary Planning Documents (SPDs), or potentially through wider based community led plans. Reference in the revised Core Strategy will accordingly only generally refer to neighbourhood plans.
0058	North West Regional Development Agency	Renaissance House Centre Park Warrington	The area is unclear on the key diagram. A more detailed map should be provided.	Policy R16 has been replaced by a more broadly based neighbourhood policy in the revised Core Strategy and places emphasis on continuing improvement and change across the resort and inner area neighbourhoods. With no current certainty in terms of the future preparation of a North Beach Neighbourhood Plan, it is inappropriate to include a more detailed North Beach plan, but an inset plan will be included in the revised Core Strategy showing the defined wider inner area boundary and resort neighbourhoods.
Policy R17: Key Resort Gateways				
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	Objects to the exclusion of a Key Resort Gateway that directs visitors to Pleasure Beach. Consider that an additional Gateway should be identified linking Yeadon Way/Waterloo Road parking to Pleasure Beach and South Beach. This would then act as a catalyst to improving connectivity and enhancing the environment in this area, which does not present an attractive approach to one of the UK's most popular tourist attractions.	Central Corridor is one of the key resort gateways identified which includes Seasiders Way and a number of resort car parks close to the Pleasure Beach and adjacent to the area defined as South Beach. The Policy promotes improvements to vehicle and pedestrian linkages through the Corridor and improved parking and reception facilities, and this is considered sufficient to improving connectivity and enhancing the environment in this area. In addition, Policy CS21: Arrival and Movement supports improvements to enhance the quality of experience on arrival and the quality of movement within the resort.

Resp No	Name/Company	Address	Comment	Council Response
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	Generally supportive.	Support noted.
0035	Blackpool, Fylde & Wyre Economic Development Company		Suggest the addition of Talbot Road could also be described as a key resort gateway.	Whilst Talbot Road is dealt with in the Town Centre policies, including the Central Business District (Talbot Gateway) Policy, it is agreed that it forms a key resort gateway to the town centre, and therefore the Revised Preferred Option proposes to include it .
Policy R18: The Promenade				
0034	Head of Heritage Heather Morrow	Blackpool Council	Supports this policy. Comments that by retaining and enhancing the quality and vibrancy of the Promenade ensures that it continues and guarantees its original purpose as the main artery of the resort.	Comment noted. This policy has been removed from the Revised Preferred Option and is now included within other policies.
0037	Muse Developments Ltd		Talbot Gateway proposes up to 4 new hotels which will assist the Council in achieving its aim of improving visitor accommodation within the Town Centre. Supports the focusing of hotels to existing established resort areas and within the Town Centre.	Comment noted.
0059	Karen Taylor	Themis Chambers Suite 14067 145-147 St Johns Street London	Opposed to this policy as it promotes new hotel development. Asks how the Core Strategy on one hand seeks to decrease the number of bed spaces whilst still making provision for new hotels.	There is a generally accepted need across the resort to reduce the amount but to uplift the quality of resort holiday accommodation. The Core Strategy sets out the range of policies to seek to provide for this to happen. New hotels provide a different offer and promoting opportunities for new development in parallel with improvements to existing stock is fundamental to providing Blackpool with a more successful holiday future.

Resp No	Name/Company	Address	Comment	Council Response
Policy R19: Main Holiday Accommodation Areas				
0002	Mr D E Askham	Crystal Lodge Holiday Apartments 10-12 Crystal Road Blackpool	In favour of Policy R19A. Current Resort Neighbourhood Areas should be retained but planning relaxed across the whole area to allow conversion to residential accommodation. Key issue is the prevention of HMOs. All new hotels must be accredited to a minimum of 4 stars.	There is strong support to continue to retain holiday accommodation use and resist change in areas where this is realistic and it continues to be the dominant use. This is supported by the Council, with the reduced areas defined in the adopted Holiday Accommodation SPD. The Council could not legally enforce all new hotels to be 4 star standard. The need is for a full range of good quality accommodation whether 1, 2, 3 or 4 star.
0014	Blackpool Pleasure Beach Ltd	Ocean Boulevard Promenade Blackpool	Support this policy in principle. Request that the Core Strategy makes clear that further high quality hotel development at Pleasure Beach will be supported. This can act as a catalyst to the upgrading and redevelopment of hotels elsewhere in Blackpool.	Comment noted. Revised Preferred Option policy CS20 'Leisure and Business Tourism' supports new hotel development in the town centre, resort core and adjacent holiday areas which includes the potential for further high quality hotel development at the Pleasure Beach which is located within the Resort Core.
0015	Bourne Leisure Ltd		Consider that additional holiday areas outside the main resort area, such as Marton Mere should be identified as important holiday areas, with planning policies put in place to support their enhancement and long term future. It will be important for the Council to ensure that tourism companies are allowed to invest in their businesses, through positive planning policies in	The policy focus of the Core Strategy is on retention, improvement and provision of new holiday accommodation in the town centre and resort core. However, it is accepted that the specific accommodation provided at Marton Mere Caravan Park is a further complementary, distinctly different and important element of Blackpool's supporting holiday accommodation offer. Policy CS20 of the Revised Preferred Option reflects this and the Council's wider policy towards new tourist

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			order to improve the overall tourism offer, promote facilities and extend the visitor season.	facilities outside the main resort and town centre.
0034	Head of Heritage	Blackpool Council	Suggests that reference should be made to the detailed information gained from the historic characterisation studies to ensure that those building with historical significance will be safeguarded and protected.	<p>Comment noted. While there is a strong frontage of key hotels of historic importance and heritage interest along the main seafront promenade, Revised Preferred Option policy CS8 'Heritage recognises and specifically refers to the wider need (informed by the characterisation studies) to identify a local list of historic buildings across the resort which should be conserved and safeguarded.</p> <p>It is not appropriate to make further reference under holiday accommodation policies as this point relates to a wider focus, and is not specific to holiday accommodation.</p>
0043	Mr Chris Wood	46 Palatine Road Blackpool	<p>Deeply concerned about the proposals in the Core Strategy particularly relating to the Holiday Areas, specifically his property being outside of the proposed Main Holiday Accommodation Area.</p> <p>Raises concerns that properties outside the Main Holiday Accommodation Area will turn into HMOs.</p> <p>States it is too costly to convert from holiday to permanent accommodation.</p>	<p>The policies outside the proposed main holiday areas provide owners with greater flexibility to retain properties in holiday use or convert to residential use, and are focused on uplifting quality and resisting poor quality HMO residential uses.</p> <p>The specific issue regarding the detailed boundaries in Policies R19 and R20 was not a matter for the Core Strategy and has been dealt with as part of the detailed consultation on the Supplementary Planning Document on Holiday Accommodation, in parallel with consultation on the Core Strategy.</p>

Resp No	Name/Company	Address	Comment	Council Response
				The Council has put many measures in place to deals with HMOs including the Selective Licensing Project, Proposed Article 4 Direction and Residential Conversions SPD.
0056	Mr Richard De Longa	4 Pleasant Street Blackpool	Proposes the Lord Street Main Holiday Accommodation Area be extended to include Pleasant Street, between Dickson Road and Braithwaite Street.	The specific issue regarding the detailed boundaries in Policies R19 and R20 was not a matter for the Core Strategy and has been dealt with as part of the detailed consultation on the Supplementary Planning Document on Holiday Accommodation, in parallel with consultation on the Core Strategy.
0058	North west Regional Development Agency	Renaissance House Centre Park Warrington	States that it is not possible to identify these areas thoroughly on the key diagram.	The detailed boundaries are not a matter for the Core Strategy and have been defined in the Supplementary Planning Document on Holiday Accommodation, in parallel with consultation on the Core Strategy.
0059	Karen Taylor	Themis Chambers Suite 14067 145-147 St Johns Street London	<p>In disagreement with this policy.</p> <p>Suggests that many businesses will be excluded purely on a postcode basis. Consider this to be unreasonable.</p> <p>Asks whether there is any financial support for those businesses excluded from the areas.</p> <p>Ask whether future funding will be available to those holiday accommodation properties outside the new proposed holiday areas.</p>	<p>The specific issue regarding the detailed boundaries in Policies R19 and R20 was not a matter for the Core Strategy and has been dealt with as part of the detailed consultation on the Supplementary Planning Document on Holiday Accommodation, in parallel with consultation on the Core Strategy.</p> <p>The Core Strategy policy relates to the future use rather than potential funding support for the holiday areas. Policies R19 and R20 clarify the Council, will continue to support and promote existing holiday accommodation whether inside the main holiday accommodation or in mixed (holiday accommodation/ residential)</p>

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			Queries the justifications behind the designation of the 6 holiday areas.	neighbourhoods. The basis for the justification of the six holiday areas is set out in the Fylde Coast Accommodation Study, referred to in the supporting text to Policy R12 (Resort neighbourhoods) and which forms an important element of the evidence base of the Core Strategy. The justification is also set out in the adopted Holiday Accommodation SPD.
Policy R20: Mixed Neighbourhoods				
0012	Blackpool Holiday Trades Association	Queen Victoria Hotel 60 Station Road Blackpool	Consider that the Council's control of the spread of multi-occupation in the neighbourhood has been very weak to date, therefore having a negative effect. The transition to a 'good quality residential neighbourhood' will not be possible without effective control of the volume and management of HMOs.	The adopted "New Homes from Old Places" Supplementary Planning Document has been will provides strict guidance to developers who want to convert from holiday to permanent accommodation. Change to residential use will only be permitted which conforms to the Council's revised higher standards. In parallel the Council fully recognises the need and is taking a stronger and more pro-active approach to dealing with problem HMOs.
0054	Ms Vicki Gale	22 Alexandra Road Blackpool	Raises concerns with this policy. States that if significant numbers of hotels, guest houses and ex-hotels are to be removed that requires a strategy to replace them with viable alternatives. Conversion to single dwelling seen as an unrealistic solution. There has to be a strategy for supporting and maintaining	The policies outside the proposed main holiday areas provide owners with greater flexibility to retain properties in holiday use or convert to residential use, while uplifting quality and resisting poor quality HMO residential uses. The Core Strategy Policies R19 and R20 (CS23 and 24 in the Revised Preferred Option) provide the basis for consideration of future planning

Resp No	Name/Company	Address	Comment	Council Response
			properties in the mixed areas.	<p>applications and continue to support and promote existing holiday accommodation whether inside the main holiday or in mixed use neighbourhoods. The policy does not require conversions from hotel use, but gives more flexibility to do so.</p> <p>It should be noted, following public consultation on the detailed boundaries in the Supplementary Planning Document on Holiday Accommodation, that Alexandra Road is now included within the South Beach Main Holiday Accommodation Area.</p>
0055	Gillian Wilsden	82 Withnell Road Blackpool	<p>Concerns regarding the Main Holiday Accommodation Areas and Mixed Neighbourhood</p> <p>Suggests the enforcement of en-suite accommodation, as this would reduce the amount of bedrooms by approximately one third, and considerably upgrade the standards in the process.</p> <p>Concerns raised over the conversion of properties out on the holiday areas to HMOs.</p>	<p>The Council cannot legally enforce to require en-suite accommodation in terms of existing properties, but sets out the policy basis whereby proposals for improvements, change of use, and new accommodation which did not meet sufficient quality standards would not be permitted.</p> <p>Change to residential use will only be permitted which conforms to the Council's revised higher standards. In parallel the Council fully recognises the need and is taking a stronger and more proactive approach to dealing with problem HMOs.</p>

Chapter 6: M55 Hub Growth Point

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Marton Moss/M55 Hub General Comments				
0020	Lancashire County Council	County Hall PO Box 100 Preston	Support the approach of regeneration of the Urban Core and the promotion of the M55 Hub of the growth point in principle. Note that the planned growth set out is dependant on the support of Fylde Borough Council, which at the time of publication has not been confirmed.	Comment noted. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option. Subsequent changes to the Core Strategy seek to further ensure an appropriate scale and focus of integrated development within and on the edge of Blackpool (Moss House Road and Whydyke)
			A small area of Common Edge referred to in Chapter 6 is covered by the minerals and waste development framework's emerging policy on mineral safeguarding areas. There may be an opportunity for prior extraction of any mineral resource should the development proposal result in significant redevelopment.	Comment noted.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	Whilst the Agency has some concerns regarding the scale of development proposed at the M55 Hub and the potential impact on the operation and safety of the SRN, the sustainability	The scale of proposals in the Blackpool Core Strategy has been re-focused on a reduced level of development within South Blackpool (Whydyke Farm and Moss House Road), reflecting both the realities of the housing market and concerns over

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			aspirations are supported, particularly with regards to providing community facilities within walk able distance from jobs and homes and improving bus services and sustainable patterns of movement.	development of the Moss. The proposed housing is considered to be more readily integrated with the existing urban area, including sustainable transport linkages. Specific work was undertaken to test the impact of the development previously proposed in consultation with the Highways Agency.
0030	Sainsburys Supermarkets Ltd		Acknowledge that this is a concept masterplan and has not yet been agreed by Blackpool and Fylde Councils but support the aspiration for this sustainable urban extension. Sainsbury's believe this is a key forthcoming area of development that will assist Blackpool in achieving its aspired status and growth.	Comment noted, however, the Revised Preferred Option no longer allocates any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
0048	Lancashire County Council	County Hall Po Box 26 Lancashire	Major landowner within M55 hub. Site suitable and available for development within 5 years. Actively investigating options to facilitate the completion of the M55-Heyhouses link.	Comment noted – with it understood the major landholding relates to lands in Fylde.
0049	Mrs Kathryn Rooney	12 Hardwicke Road Narborough	Queries the use of phasing for housing development at the Moss/Hub.	The Revised Preferred Option no longer allocates any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is

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			<p>Suggests the costs to improve the sewers and drainage could be shared between several developers as it in other areas in the country.</p> <p>Asks whether limiting development by 1200 dwellings until 2021 or beyond will not meet the required housing targets. Most of the land on Marton Moss is fallow land and is no longer used for agricultural purposes.</p> <p>Supportive of a Park and Ride system which would reduce traffic congestion and encourage people to purchase</p>	<p>reflected in Policy CS27 of the Revised Preferred Option.</p> <p>With a reduced level of housing now proposed within South Blackpool, there is no phasing requirement.</p> <p>This issue is to be considered in the Infrastructure and Delivery Plan, and addressing how best to provide required infrastructure, including sewers and drainage.</p> <p>The Government has proposed the end of regional housing targets and the Revised Preferred Option has reviewed Blackpool's proposed housing targets.</p> <p>The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>Comment noted.</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>property in this area.</p> <p>Suggests there is a shortage of 'executive' housing in Blackpool and developing land on the Moss would facilitate expanding this type of housing.</p>	<p>Comment noted and this is fully recognised as part of the need for development at South Blackpool.</p>
0052	North and Western Lancashire Chamber of Commerce	1-2 Lockheed Court Amy Johnson Way Blackpool	<p>Fully supportive of the aims and objectives. Improvements need to be made to Yeadon Way gateway.</p>	<p>Comment noted.</p>
0058	North West Regional Development Agency	Renaissance House Centre Park Warrington	<p>Policies in Chapter 6 focus on residential development and supporting community facilities with little emphasis on employment.</p> <p>The SA focuses on the implementation of providing 2700 houses at the M55 Hub, rather than its potential economic benefits. Would be helpful if the Core Strategy provided some indication of the amount of employment land that could be provided as part of the overall mix of uses both within Blackpool and in the M55 Hub as a whole.</p>	<p>In conjunction with the reduced housing figures, the Revised Core Strategy gives increased emphasis to employment provision in south Blackpool. The nature of the lands on the Moss within Blackpool mean it is not itself appropriate for employment development</p> <p>The Revised Preferred Option no longer allocates any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>Policy CS4 of the Revised Preferred Option prioritises for a strengthened town centre and the South Blackpool employment focus is highlighted in policies CS3 and CS25 of the Revised Preferred</p>

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				Option. The Sub-Regional Employment Land Statement reflects the latest position and has been revised and updated for Blackpool, Fylde and Wyre.
0059	Karen Taylor	Themis Chambers Suite 14067 145-147 St Johns Street London	<p>Comment that there is no need for housing development on Marton Moss. Disagree with the use of greenbelt for housing with no justification.</p> <p>Consider that any development on the Moss would conflict with policies S6 and S7 and that any housing development would not sustain/enhance the biodiversity of protected habitats and species, would not minimize waste generation, noise or energy consumption.</p> <p>Suggests it conflicts with the recommendations made by Hyder in the Sustainability Appraisal.</p>	<p>The Revised Preferred Option no longer allocates any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>Notwithstanding the above, the earlier recommendations in the Hyder Sustainability Appraisal caveated support for substantive housing development on the Moss with the need to ensure it formed part of a wider sustainable new community which addressed impacts and provided new jobs and supporting community facilities as well as homes. The refocused proposals in the Revised Preferred Option have also been subject to independent reassessment as part of the continuing Sustainability Appraisal process. The revised proposals reflect both the realities of the housing market and the previous representation received.</p>

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			<p>Suggests the development of housing on the Moss will result in housing in the resort being empty.</p> <p>Ask why there is a complete change of policy compared with the current adopted local plan which protects this area from any form of development.</p>	<p>The development at South Blackpool is complementary to and will be supportive of development in the inner area of Blackpool. While seeking to widen the mix of housing both in South Blackpool and in the inner areas, the two locations effectively address and will meet the needs of substantially different elements of the Blackpool housing market.</p>
0060	Fylde Borough Council	Town Hall Lytham St Annes	<p>Do not support the preferred option. Acknowledges the health warnings on pages 95 and 96 which respectively state 'in Fylde Council's terms' but does not imply any acceptance; and has not been agreed. If the M55 Hub is to be an option at all for Fylde it will have to be considered alongside a number of other spatial options. Fylde Borough Council is intending to publish its Issues and Options Paper later this year. Fylde do not support or commit to the Joint SPD referred to on page 94.</p> <p>Notes that page 93, para 7 states 'viewed separately the proposed development of the lands in Blackpool still represents a logical and deliverable extension of the existing Blackpool urban area on lands within the boundary.' However, there is a somewhat contradictory footnote on Page 6 which states that 'the alignment</p>	<p>The Revised Preferred Option no longer allocates any housing on the remaining lands at the Moss or development at the M55 Hub. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>The focus of the proposal in the Blackpool Core Strategy Preferred Option was on lands in Blackpool, but presentation did focus on the potential for the Moss to also come forward as part of a potential wider development. In the event, the Government's announcement of its proposed ending of regional housing targets, the continuing realities of the housing market downturn, and wider representations on the proposed development on Marton Moss, as well as Fylde Borough Council's own concerns, have all</p>

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			<p>of any Core Strategy proposals for development on the edge of Blackpool is also dependent on the decisions of Fylde Council'.</p> <p>In addition to the above there is also conflict between the Preferred Option and David Lock Associates (DLA) 'M55 Hub Conceptual Master Plan' Draft Final Report (May 2010) which you are aware of. Para 6.2 of DLA's Draft Final Report states 'The M55 Hub can only be delivered in the comprehensive manner advocated if the policy frameworks for both Councils are aligned. This section on Delivery & Implementation makes the assumption that a consistent and comprehensive policy framework will be put in place.'</p> <p>Understands that the of the M55 Hub is one which is dependant upon a critical mass of development taking place if it is to be considered at all viable. The DLA Draft Final Report now shows an indicative residential capacity of approximately 5,000 dwellings, not 7,000. Questions if there may be a further reduction in both housing numbers and employment land requirements. If either the 'Blackpool</p>	<p>been reflected in a substantial reduction in the scale of housing now proposed within South Blackpool.</p> <p>The flexibility remains to in future accommodate potential decisions of Fylde Borough Council for adjoining lands in consultation with Blackpool Council.</p> <p>Notwithstanding the above, the jointly commissioned David Lock Associates (DLA) Conceptual Masterplan questioned the deliverability of a wider new community and its associated benefits without a sufficient scale of new homes and jobs. The concerns remain that without such wider provision what would result would be a series of ad hoc incremental developments rather than the comprehensive nature of development previously considered in the masterplan.</p> <p>The eventual decisions of Fylde Borough Council, in the absence of pursuit of a wider new community at the Hub, will need to have similar regard to ensure they can be readily integrated, aligned and complement proposals in Blackpool to avoid the concerns raised by Fylde Borough Council's representations.</p>

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			<p>Only' version of growth at the end of the M55 or a significantly reduced Blackpool / Fylde Hub were to proceed, then this is unlikely to deliver the associated community facilities, district centre, schools, etc. In any event the final Conceptual Master Plan shows the majority of community facilities as being beyond Blackpool's boundary. (Please refer to specific comments in relation to Figure 11 below). If a 'Blackpool Only' version of growth at the end of the M55 was to happen I think this is more likely to result in a series of ad-hoc, incremental developments rather than the comprehensive nature of development illustrated in the Conceptual Master Plan.</p> <p>In view of the above it is my opinion that the Preferred Option does not adequately demonstrate that lands in Blackpool at the M55 Hub can be delivered in isolation.</p>	
			<p>Page 96, Figure 11: Suggests the area on the Fylde side should be shown as either hatching or not at all, rather than a detailed master plan which should be shown on the Blackpool side. If shown as per page 25, Figure 5, this would help to draw a distinction between the two parts</p>	<p>The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where</p>

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			given the fact that the M55 Hub concept has not yet been agreed as an option in Fylde. If, as suggested at page 93 Para 7, a 'Blackpool Only' version of the growth at the end of the M55 can be delivered then my suggestion is even more pertinent.	development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option. A revised South Blackpool section has been prepared for the Revised Preferred Option.
Policy M1: Strategic Allocations				
0001	Rashmi Pandav Blackpool Congregation of Jehovah's Witnesses	9 Lowthorpe Crescent Preston	Welcomes and support the reference made in Area D to community uses at Whyndyke Farm. However, notes that Areas A-C will require an allocation of community uses and timescales.	Comment noted. The community use referred to in policy M1 was a Mental Health Unit which now has planning permission. Any development on the wider Whyndyke lands will be dealt with through the Fylde Council development management process or core strategy process, whichever comes first. The Council is no longer pursuing housing development on the Moss. The neighbourhood planning process will allow for new community uses if desired by the community.
0006	Mr D Challinor	8 Glencross Place Blackpool	Opposed to the proposals for Marton Moss because: 1. Contradicts current trends for green policy and will lead to the removal of one of Blackpool's few green areas. 2. No plan for where the new population will find employment. 3. It would be wiser to utilise redundant hotels to reach the required housing	The Council is no longer pursuing housing development on the Moss. The reduced scale of development proposed is also aligned with an increased focus on complementary employment opportunities in south Blackpool. The major focus of the Core Strategy is on inner area regeneration, with a range of policies which address issues regarding the current over provision

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0008	Ms Angelia Hinds	21 Moss House Road Blackpool	<p>numbers.</p> <p>In the light of recent Government changes and revocation of the RSS housing figures, it is unlikely that Fylde Council will continue with their Core Strategy. Asks if the Blackpool Core Strategy will be revised to include alternative proposals, such as the inclusion of additional schools and employment areas?</p> <p>Also asks when the joint SPD with Fylde will be produced.</p>	<p>of holiday accommodation in Blackpool.</p> <p>The Council is no longer pursuing housing development on the Moss. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>The reduced scale of development proposed is also aligned with an increased focus on complementary employment opportunities in south Blackpool. Future proposals for schools will need to be aligned with the reduced scale of development proposed in the Revised Preferred Option.</p> <p>Reflecting the focus on lands within Blackpool, reference in the revised Preferred Option is made to the potential for a neighbourhood plan for Marton Moss. There is now no intention to prepare a joint SPD with Fylde Council.</p>
0008	Ms Angelia Hinds	21 Moss House Road Blackpool	<p>All housing figures from the RSS will have to be revisited in the Core Strategy and SHLAA and reasoning behind the proposed development at Marton Moss and the M55 Hub.</p>	<p>The approach taken in the Revised Preferred Option substantially reduces the scale of proposed housing in Blackpool. The reduced scale of development proposed is also aligned with an increased focus on complementary employment opportunities in south Blackpool.</p>

Resp No	Name/Company	Address	Comment	Council Response
0009	Lesley M Bosworth	36 Haig Road Blackpool	<p>Objects to the proposals for Marton Moss:</p> <ol style="list-style-type: none"> 1. Building on Marshy land can be disastrous. 2. This green area should be protected. 3. Large amount of objections by local population. 	The Council is no longer proposing housing development on Marton Moss. For the case of lands at Whyndyke Farm and Moss House Road, Policy CS26 'South Blackpool Housing Growth' recognises and highlights the need to address drainage and surface water management issues .
0018	Kensington Developments Ltd	94 Park View Road Lytham	Support the broad locations for development. The number of dwellings should reflect the capacity of the sites rather than being an arbitrary figure.	Comment noted, however the Revised Preferred Option no longer allocates any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
0019	Mr Joe Chabba		<p>Supports proposals for the M55 hub provided:</p> <p>Housing has green areas and off street parking. Scenery is retained Developers have an interest in the local community The roads should be widened There should not be any compulsory purchases</p>	Comments noted. The Council is no longer proposing housing development on Marton Moss. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
0020	Lancashire County	County Hall	The lettering/notation of the various	The Council is no longer proposing housing

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	Council	PO Box 100 Preston	sites is not clear for policies M1 and M2.	development on Marton Moss. A revised plan illustrating South Blackpool is provided in the Revised Preferred Option.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	<p>The development proposed at Marton Moss / M55 Hub is likely to have the most significant impact for Agency out of all the development proposed within the strategy, given the proximity to Junction 4 of the M55 and the generally unsustainable location with regards to existing levels of sustainable accessibility and the lack of sustainable transport provisions.</p> <p>The Agency expects that the implications for transport and infrastructure, particularly with regards to the increase in trip generation and the requirements and deliverability of supporting infrastructure will have been identified and appropriately assessed. At the time of this response the traffic modelling being undertaken in support of the Hub was not available for the Agency to review. The Agency will expect that this information will be made available as soon as possible and particularly prior to consultation on the Publication draft.</p>	<p>The scale of proposals in the Blackpool Core Strategy has been re-focused with the Revised Preferred Option no longer allocating any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>Specific further work has been undertaken to test the impact of the various development now proposed (Whyndyke and Moss House Road) in consultation with the Highways Agency.</p>
0031	Sport England	Building 3 Universal Square Devonshire Street	Policy M1 identifies four sites to be allocated for residential development which include existing sports facilities	The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being

Resp No	Name/Company	Address	Comment	Council Response
		Manchester	<p>such as football pitches, school playing fields, tennis courts, and equestrian facilities. Whilst the text following the policy makes clear that the intention is not for comprehensive redevelopment of these areas, the policy itself would appear to suggest that the principle of residential use on a site which is currently used for sport would be acceptable.</p> <p>In Sport England's experience, housing allocations which have not made explicit reference to existing sports facilities have proved to be contentious. In light of this Sport England would wish to see the policy amended to make explicit that existing sports facilities would be safeguarded.</p>	<p>promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>Existing sports facilities are located south of Progress Way. Revised Core Strategy policy CS6 'Green Infrastructure' refers to the protection of existing green infrastructure including sports pitches, playing fields etc.</p>
0036	Closetlink Ltd		<p>Supportive of reference to site D. Suggest that more emphasis should be placed on the fact that it is a cross boundary site with the smaller percentage being located in Blackpool's boundary. The allocation of site D in isolation does not portray the full picture.</p> <p>Reference should be made to residential on site D in conjunction with development of a mental care hospital.</p>	<p>Policy CS26 'South Blackpool Housing Growth' identifies that the land at Whyndyke is mainly in Fylde. A map showing South Blackpool identifies the wider Whyndyke land that it within Fylde's boundary.</p> <p>Reference is made in the Revised Preferred Option policy 'South Blackpool Housing Growth' to proposed housing development at Whyndyke</p>

Resp No	Name/Company	Address	Comment	Council Response
			No figure is identified for the potential number of dwellings on the site, which should read as 100 for site D.	Farm. Decisions on the future development potential of the wider remaining lands will require and depend on close co-operation between Blackpool and Fylde Councils.
0054	Ms Vicki Gale	22 Alexandra Road Blackpool	Concerned that the scale of the Council's proposals for development on the outskirts of the town – especially Marton Moss. Consider them unwise environmentally and economically and risk diverting resources and focus on the need to regenerate Central Blackpool rather than planning communities focused rather on shopping and spending towards Preston than in Blackpool.	The Council is no longer proposing housing development on Marton Moss. The overriding focus of the Core Strategy is on the regeneration of central Blackpool, with a reduced proposed level of supporting growth on South Blackpool. The important balance between homes and jobs is fully recognised, with the provision of a mix of quality homes within Blackpool itself being an important element of meeting resident needs within a balanced community. The proportion of people who live and work within Blackpool is high compared to many areas, and will be supported by its regeneration and development of better shopping and supporting facilities in central Blackpool. Its successful long term future must also be supported by a balanced mix of new housing.
Policy M2: Phased Release of housing sites at Marton Moss/M55 Hub				
0008	Ms Angelia Hinds	21 Moss House Road Blackpool	Queries whether Area A should be included in the policy as the land has now received outline planning permission.	The area is excluded from the strategic site allocations in the Revised Preferred Option. It is recognised in policy CS26 'South Blackpool Housing Growth'.
0008	Ms Angelia Hinds	21 Moss House Road Blackpool	Queries whether inner regeneration needs to keep pace with development on the periphery. Suggests conflicting statements have been made in the	Inner area regeneration and development on the periphery are proposed as fundamental supporting elements of uplifting the overall range and mix of Blackpool's housing offer. The type and format of

Resp No	Name/Company	Address	Comment	Council Response
			document.	development, funding linkages and pace of development will be complementary and coordinated, but ultimately it is acknowledged the extent of co-ordination and pace of development will also be dependent on the housing market, public funding, and the wider progress of regeneration.
0013	Blackpool LSP Environment Sub-Group	Lutra House Dodd Way Walton Summit Preston	<p>A Surface Water Management plan is being prepared; however, as yet no plans have been produced that show significant infrastructure capacity issues with regards to foul and surface waters can be resolved.</p> <p>Whilst mention is made in Policy M2 of a phased approach to the development at Marton Moss, unless a plan is in place to deliver improvements to the drainage network, all that will be achieved is gradual further deterioration of water quality from illegal discharges from the sewerage network. In order to avoid this and a significant deterioration in bathing water quality (and resulting impact on tourism) the group considers that the issues around foul and surface water capacity must be resolved before any commitment is given for a large scale expansion of Blackpool. We would wish to see the proposed solutions from the Surface Water management Plan agreed</p>	<p>The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>Notwithstanding this, the Infrastructure and Delivery Plan which will be published alongside the Pre-Submission version of the Core Strategy will set out the latest progress of ongoing studies and consultation on these issues. Information from the Surface Water Management Plan, Water Cycle Study in conjunction with ongoing modelling work of United Utilities will identify the necessary measures required to be undertaken to support the future level of development now proposed in South Blackpool.</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>and a commitment to deliver these as part of any plans to expand Blackpool. These must be in place before the Core Strategy is submitted to the Secretary of State.</p> <p>No mention is made in the Core Strategy to the Water Framework Directive, which requires all water bodies to reach good ecological status/potential.</p>	<p>A range of Core Strategy Policies safeguard water quality and habitats, and extensive reference is made to water quality issues in the supporting evidence base. This relates to both bathing waters and other water bodies which are safeguarded and protected by Blackpool's wider Local Plan policies.</p>
0018	Kensington Developments Ltd	94 Park View Road Lytham	<p>Not supportive of strict phasing. Consider that development of sites B and C post 2016 would adversely impact on the continued supply of housing.</p> <p>The ban on conversions and infill is considered to be contrary to national guidance and contrary to the stated output from such conversions in Policy S3. Such small scale development would not, if submitted, prejudice the principles of the M55 Hub.</p>	<p>The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>The opportunity will be to explore with the community the potential for landscape and built enhancement which could include a relaxation in the restrictions on conversions, replacement dwellings and the scale of extensions is appropriate. This will be considered as part of a future neighbourhood planning process, following adoption of the Blackpool Core Strategy.</p>
0021	Ms Anne Frith	Runnell Cottage Chapel Road	<p>It is important to develop new areas for housing to keep a community in</p>	<p>Comment noted, however the Council is no longer proposing housing development on Marton Moss.</p>

Resp No	Name/Company	Address	Comment	Council Response
		Blackpool	Blackpool. There is a transient population in Blackpool and areas such as Marton Moss and South Shore provide stability. Many parts of the Moss are neglected. Development would provide improvements to the area.	
0023	Environment Agency	Lutra House PO Box 519 Preston	State that although phasing of sites may help in the provision of infrastructure and it may not be the solution. The Environment Agency do not want to see an increase in volumes of surface water discharged into the combined system and if the system is intended to accept increases in foul sewage, then it will be necessary to reduce the volumes of surface water discharging to the system	The Council is no longer proposing housing development on Marton Moss. These issues will however be addressed in the Infrastructure and Delivery Plan (to be published at Pre-Submission stage). More detailed assessments are being undertaken through the Surface Water Management Plan and the Water Cycle Study, together with ongoing modelling work by United Utilities. This will identify necessary measures required to be undertaken to support the future level of development now proposed at South Blackpool, reduce the volume of surface water discharged into the system and reduce the risk of spills to the Irish Sea adversely impacting on bathing water quality.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	Consideration needs to be made when phasing new housing development as to how it will be coordinated with the delivery of supporting infrastructure. The Agency therefore considers that it is essential to identify how new housing sites will be phased and aligned with the delivery of new or improved physical infrastructure / sustainable transport provisions which are required to support	The Revised Preferred Option no longer allocates any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.

Resp No	Name/Company	Address	Comment	Council Response
			the delivery of new housing sites. This is particularly pertinent for the M55 Hub strategic development sites where new and improved physical infrastructure may be required and where new supporting sustainable transport provisions and other community facilities and services need to be delivered to support the sustainable delivery of the proposed housing growth.	However, the Infrastructure and Delivery Plan will be informed by traffic impact assessments of potential development at South Blackpool in consultation with the Highways Agency to ensure proposals are supported by required highways and transport infrastructure improvements.
0036	Closelink Ltd		<p>This policy does not refer to the Whyndyke Farm site in the phasing schedule and fails to reflect the fact that the sustainable extension must be considered holistically.</p> <p>Any phasing of development must be considered for the M55 Hub Growth Point as a whole and be agreed by both Councils.</p>	<p>The re-focus on reduced housing numbers within Blackpool, and the approval of the mental health hospital mean this site is now included in policy CS26 'South Blackpool Housing Growth' in the Revised Preferred Option.</p> <p>Reference will continue to be made in the supporting text to cross boundary issues, including the potential for future development of this site.</p> <p>The Core Strategy sets out no strict phasing of proposed development on future lands within Blackpool.</p>
Policy M3: New Neighbourhood Development: Housing Mix				
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	The Agency would wish to ensure that point (iii) in relation to providing for Blackpool's needs is ensured rather than the housing at the hub becoming an area where those who choose to live there are those who work in areas external or distant from the site, and by virtue make	The Revised Preferred Option no longer allocates any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where

Resp No	Name/Company	Address	Comment	Council Response
			increased journeys by use of the SRN. As such appropriate connectivity issues should be considered to ensure the ease at which movements between the area and the Blackpool core are strengthened.	development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
Policy M4: New Neighbourhood Development: Community				
0008	Ms Angelia Hinds	21 Moss House Road Blackpool	Questions whether a primary school will be required for the pre 2016 development.	<p>The Revised Preferred Option no longer allocates any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>However, monies towards the provision of a new primary school are required as part of the existing planning permission for Moss House Road. Further funding will be provided from any future planning permissions. An outline planning application has been submitted for residential development at Whyndyke Farm which includes a new primary school.</p>
0020	Lancashire County Council	County Hall PO Box 100 Preston	State that evidence needs to be provided to support the Core Strategy in order to demonstrate how community, social and green infrastructure will be delivered.	The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the

Resp No	Name/Company	Address	Comment	Council Response
				Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	The Agency is supportive of requiring new housing development at the M55 Hub to provide community facilities, services and schools to support the sustainable delivery of the proposed housing growth. The provision of such community infrastructure, particularly where it is provided within a walk-in catchment should help to reduce the need to travel.	<p>The Revised Preferred Option no longer allocates any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>The neighbourhood planning process for Marton Moss will allow for new community uses if desired by the community.</p>
0031	Sport England	Building 3 Universal Square Devonshire Street Manchester	<p>Supports this policy as it recognises that the proposed development would create additional need for infrastructure. However, Sport England would recommend that bullet point iv) of the policy is amended to read "Open space, sport and recreation facilities".</p> <p>State that a PPG 17 compliant audit of provision / assessment of current and future needs are considered essential to appropriately identify the nature and level of open space, sport and recreation</p>	The Council is no longer proposing housing development on Marton Moss/M55 Hub. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.

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			<p>provision required.</p> <p>It would appear that the intention is to retain some existing sports facilities within the sites allocated for housing (as the text on page 106 refers to integration with existing facilities such as South Shore Lawn Tennis Club, Squires Gate FC and Blackpool Wren Rovers FC). This intention to retain such facilities is not made clear in policy M1 though (see comments above) which allocates the broader areas the facilities sit within for housing.</p>	<p>The Core Strategy is informed by the Council's 2009 Audit of Sports and Recreation Facilities</p>
Policy M5: Neighbourhood Character, Marton Moss/M55 Hub				
0013	Blackpool LSP Environment Sub-Group	Lutra House Dodd Way Walton Summit Preston	<p>Within Policy M5, mention is made of a biodiversity strategy for the M55 Hub / Marton Moss and it is vital that this strategy must (not should) be implemented as part of any development of the Moss.</p> <p>The strategy must be developed in advanced of any development and should aim to provide a step change increase in biodiversity. The strategy could look to expand the Local Nature reserve status around Marton Mere to include other adjacent important sites for biodiversity. The biodiversity strategy needs to be designed as a</p>	<p>The Council is no longer proposing housing development on Marton Moss/M55 Hub. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>Protecting biodiversity is covered by policy CS6 'Green Infrastructure' of the Revised Preferred Option.</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>comprehensive plan for the whole of the Moss to ensure that its implementation can be phased in as the development of the Moss progresses through to 2026.</p> <p>The biodiversity strategy for the M55 Hub / Marton Moss mentioned in Policy M5 should be extended to cover Blackpool as a whole.</p>	Blackpool Council supports the Lancashire Biodiversity Action Plan and the measures it promotes across Blackpool.
0017	English Heritage	Suites 3.3 and 3.4 Canada House 3 Chepstow Street Manchester	More specific reference should be made Marton Moss Characterisation Study.	Specific reference is made to the Study in the Revised Preferred Option.
0021	Ms Anne Frith	Runnell Cottage Chapel Road Blackpool	Agree with keeping the neighbourhood character of the Moss including the lanes, dykes and hedgerows. Green spaces should be retained for leisure and allotments provided.	Comment noted. The emphasis for Marton Moss in the Revised Preferred Option is the retention and enhancement of its existing character.
0023	The Environment Agency	Lutra House Po Box 519 Preston	<p>Raises concerns about drainage issues relating to the M55 Hub development. Complete evidence base is necessary prior to preparation of the submission draft document which needs to include a Surface Water Management Plan and Water Cycle Study.</p> <p>Evidence is also required from the Water Company to understand potential</p>	<p>The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>Drainage issues will be addressed in the Infrastructure and Delivery Plan. More detailed</p>

Resp No	Name/Company	Address	Comment	Council Response
			pressures of further development on infrastructure that is already at capacity and identify appropriate attenuation measures.	assessments have been undertaken through the Water Cycle Study, together with ongoing modelling work being carried out United Utilities. This will identify necessary measures required to be undertaken to support the future level of development now proposed in the South Blackpool to, reduce the volume of surface water discharged into the system and reduce the risk of spills to the Irish Sea adversely impacting on bathing water quality.
0023	The Environment Agency	Lutra House PO Box 519 Preston	This area has a diverse range of legally protected and UK BAP species and habitats including water voles. In addition to providing a detailed drainage strategy, the protection of habitats and species within the proposed development will be required to ensure the biodiversity levels are protected and enhanced. It will need to be demonstrated that any increase in surface water does not negatively impact on the habitats present. In particular the drainage ditches which are habitat for species such as water voles and great crested newts. Developers should be aware that detailed designs for developments should aim to retain habitat and increase habitat where possible. Habitat fragmentation is not acceptable under Planning Policy Statement 9 and Section 40 of the NERC	<p>The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>Policy CS27 of the Revised Preferred Option requires the neighbourhood planning process to conserve and enhance existing natural features and habitats.</p>

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0023	The Environment Agency	Lutra House Po Box 519 Preston	Act. Identify that whilst the policy encouraged SUDS, it still needs to be demonstrated that surface water from the new development can be properly dealt with, without causing or exacerbating problems downstream of the development.	Policy CS9 of the Revised Preferred Option deals with this issue.
0025	Mr John Ashworth	Runnell Cottage Chapel Road Blackpool	Supportive of the redevelopment of Marton Moss providing done in a way that complements its existing character the area.	Comment noted.
0027	Mrs E R Ashworth	Runnell Cottage Chapel Road Blackpool	Supports the sensitive and original approach to the development of Marton Moss.	Comment noted.
Policy M6: Extension to the South Blackpool Green Belt				
0011	Blackpool Airport	Squires Gate Lane Blackpool	The proposals for green belt should be undertaken considering the wider issues in relation to the role of greenbelt as the majority fall within the Fylde Borough boundary. Decision on Policy M6 cannot be made in the absence of the advancement of Fylde's Core Strategy.	In the context of the reduced housing focus, the public consultation response, and issues raised related to the proposed Green Belt, this approach is no longer pursued in the Revised Preferred Option.
0013	Blackpool LSP Environment Sub-Group	Lutra House Dodd Way Walton Summit Preston	Support the proposal to extend the green belt to the South of Blackpool under Policy M6.	In the context of the reduced housing focus, the public consultation response, and issues raised related to the proposed Green Belt, this approach is no longer pursued in the Revised Preferred Option.
0018	Kensington Developments Ltd	94 Park View Road Lytham	Policy is objected to. The green belt amendment should form part of an overall review of the green belt around	In the context of the reduced housing focus, the public consultation response, and issues raised related to the proposed Green Belt, this approach

Resp No	Name/Company	Address	Comment	Council Response
			Blackpool. Such an amendment is contrary to the advice contained in PPG2	is no longer pursued in the Revised Preferred Option.
0057	Government Office North West	City Tower Piccadilly Plaza Manchester	Careful consideration should be given to the policy's permanence. Where would future development in Blackpool, post 2026, be provided?	In the context of the reduced housing focus, the consultation response, and issues raised relating to the proposed Green Belt, this approach is no longer pursued in the Revised Preferred Option.
Policy M7: M55 Hub Transport and Connectivity				
0020	Lancashire County Council	County Hall Po Box 100 Preston	Provision of public transport is a critical element within the M55 Hub proposals. This policy is welcomed; however consideration should be given as to how the proposals will be taken forward as the proposal develops, possibly through the proposed joint SPD or as part of an infrastructure plan. Links from the M55 hub to Kirkham station to provide connections to Preston should be considered.	The Council is no longer proposing housing development on Marton Moss. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	The Agency is particularly supportive of this policy and the provision of a comprehensive transport improvement strategy for the M55 Hub. The proposals to optimise pedestrian and cycle connectivity between homes and employment are particularly supported. In respect of the principle of extension of bus routes and services, without the benefit of having seen any of the modelling work (or its outcomes), the Agency is of the opinion that the scale of	Comment noted. The Council is no longer proposing housing development on Marton Moss/M55 Hub. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.

Resp No	Name/Company	Address	Comment	Council Response
			<p>development being proposed at the Hub would warrant this policy to be strengthened such that new bus services of a high quality, rather than extended services, are referenced.</p> <p>With regards to the provision of a Park and Ride facility within the Hub, the Agency recognises the benefits this could have towards reducing congestion and car usage within the Borough particularly from visitors however, it could potentially have implications for the SRN. Further, consultation regarding the requirements and potential impact of a Park and Ride facility in this location, would be welcomed by the Agency as and when proposals are developed.</p>	<p>The need to promote sustainable patterns of travel for new residents in conjunction with the lower levels of proposed development at Whyndyke and Moss House Road is fully recognised in the Core Strategy.</p> <p>Policy CS28 'South Blackpool Transport and Connectivity' identifies a priority to 'creating direct rapid transport connections' with town centres. The viability and deliverability of such improvements will significantly depend on the scale of any wider proposed development which comes forward to support such provision. Generally, the viable improvement of services will be maximised by extending routes/ improving frequencies of existing services.</p>
0044	Sustrans	St Pauls Centre Hightown Crewe	Highlight that it will be challenging to make the M55 Hub sustainable in travel terms due to its location.	The Council is no longer proposing housing development on Marton Moss. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.

Chapter 7: Balanced, Healthy and Greener Blackpool Council

Resp No	Name/Company	Address	Comment	Council Response
Policy G1: Neighbourhood Regeneration				
0001	Rashmi Pandav Blackpool Congregation of Jehovah's Witnesses	9 Lowthorpe Crescent Preston	<p>Suggests paragraph 1 would be enhanced by adding "faiths", thereby reading:</p> <p>"A balanced and healthy community should include a mix of age groups, incomes, faiths and lifestyles in a safe and clean environment, with a full range of community facilities available to all."</p> <p>This would conform to and be in the spirit of "Diversity and Equality in Planning", where page 11 paragraph 1 states "Planning should aim to improve the lives of the widest cross section of society. Society today is made up of diverse individuals of varying faiths"</p>	A mix of age groups, incomes, and lifestyles are seen as an essential part of a balanced and healthy community. While it is understood that a mix of faiths can further enrich communities, it is not essential. The policy and indeed the Core Strategy as a whole are focused on securing a better quality of life for residents for all sections of Blackpool's community, irrespective of faith and other diversities.
0024	Hay Hill Ltd	18-22 Wigmore Street London	Concerned that the Council's proposals must be viable and realistic having regards to the current and foreseeable economic reality.	Comment noted.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	The Agency is supportive of this policy particularly with regards to permitting development and investment which provides easy access to jobs, shops and transport services and reduces the adverse traffic impacts resulting from development.	Comment noted.

Resp No	Name/Company	Address	Comment	Council Response
Policy G2: Town-wide Shopping and Community Facilities				
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	The Agency is supportive of this policy and the focus for providing major retail and community facilities within the town centre. The Agency particularly welcomes that proposals for new facilities will have to be readily accessible by sustainable transport modes.	Comment noted.
0037	Muse Developments Ltd		Supports this policy as it includes Talbot Gateway within the Town Centre Boundary.	Comment noted.
0046	Wyre Borough Council	Civic Centre Breck Road Poulton-le Fylde	<p>The second bullet of the policy makes reference to the Council's hierarchy of town, district and local centres. Whilst the district centres are listed in the policy, they contradict those shown on the key diagram on page 25 (Red Bank Road, South Shore and Waterloo Road are inconsistent).</p> <p>There is no indication in the Core Strategy of what the local centres are or what up to date evidence base has been used to establish the centre hierarchy. These matters need to be rectified.</p>	<p>The key diagram has been amended consistent with the Core Strategy retail policy (i.e. Bispham and South Shore).</p> <p>Policy G2 – now CS4 will supersede the currently saved Policies BH11 and BH12 of the Blackpool Local Plan, and set out the Council's overall approach to the future provision of town-wide shopping and facilities. The local and district centre boundaries will be re-assessed through the Site Allocations and Development Management DPD.</p> <p>The expanded Town Centre strategic site boundary is shown in the Revised Preferred Option and on</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>The Preferred Options document does not give an indication of the overall amount of retail floor space that should be provided, which is important given the removal of the needs test for applications by PPS4. It may be most appropriate to incorporate a flexible statement indicating that a certain amount of floor space will be provided by say 2017, as evidenced from the 2008 Fylde Coast Shopping Study, which will subsequently be reviewed and updated.</p> <p>It would also be appropriate to cross refer to Policies R5: Blackpool Town Centre Strategy and M4: New</p>	<p>the Key Diagram. The district centres are also shown on the Key Diagram. The Core Strategy maintains the hierarchy of District and Local Centres in Saved Policies BH13 and BH14 of the Blackpool Local Plan, as defined on the Proposals Map.</p> <p>The saved policies provide an appropriate criteria based policy framework which seeks to safeguard and enhance the role of local shopping centres. The detailed review and definition of local centres is not appropriate in the Core Strategy, but further reference will be made in the Policy and supporting text to the range of local centres.</p> <p>Reference is made in the Revised Preferred Option to the latest Fylde Coast Retail Study which reviews and affirms the hierarchy identified in the Blackpool Core Strategy and sets out the latest findings and conclusions on capacity. .</p> <p>Comment noted.</p>

Resp No	Name/Company	Address	Comment	Council Response
			Neighbourhood Development Community Infrastructure as they would also benefit from reference to floor space figures.	
0050	The Noble Organisation	1a Dukesway Court Team Valley Trading Estate Gateshead	The supporting text to the policy refers to leisure activities requiring a sequential approach as it is a type of activity that attracts a lot of visitors. The list within the policy itself therefore needs to include leisure facilities.	The Revised Preferred Option now includes a specific Leisure and Business Tourism policy.
0057	Government Office North West	City Tower Piccadilly Plaza Manchester	The Policy refers to the Council's hierarchy of Town Centre, District and Local Centres, but only sets out the main district centres. The Council's hierarchy should be defined in the Publication version of the Core Strategy.	Blackpool's hierarchy of Town Centre, District and Local Centres will be set out in the Policy. The expanded Town Centre strategic site boundary is shown in Figure 4 of the revised Core Strategy and on the Key Diagram. The district centres are also shown on the Key Diagram. The Core Strategy maintains the hierarchy of District and Local Centres in Saved Policies BH13 and BH14 of the Blackpool Local Plan, as defined on the Proposals Map. The saved policies provide a criteria based policy framework which seeks to safeguard and enhance the role of local shopping centres. The detailed definition of local centres is not appropriate in the Core Strategy, but further reference will be made in the Policy and supporting text to the range of local centres.
Policy G3: Health and Education				
0008	Ms Angelia Hinds	21 Moss House Road Blackpool	Questions whether there are alternative sites for a new secondary school if the	The level of development proposed in South Blackpool in the Revised Preferred Option is

Resp No	Name/Company	Address	Comment	Council Response
			school is not built in Fylde.	significantly reduced from the Preferred Option and is unlikely to require new high school provision.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	The Agency is supportive of providing new facilities to support new and existing communities which currently lack sufficient provisions, particularly where it can help to reduce the need to travel	Comment noted.
0031	Sport England	Building 3 Universal Square Devonshire Street Manchester	<p>Given recent announcements by the Coalition Government with regards to BSF, this section would benefit from revision.</p> <p>Suggests the policy be amended to support dual / shared use of school facilities (including sports facilities). Opening up school sites for wider community use can increase accessibility to facilities, and also contribute towards sustainable development objectives by making more intensive and efficient use of resources. In addition, using school sites in this way can benefit young people by strengthening the links between their involvement in sport during school time and continued participation in their own time.</p> <p>State there is potential for new primary</p>	<p>The DfeS Building Schools for the Future programme remains appropriately referred to in the Policy - school rebuilding is continuing, even though the full scale of the programme has been curtailed. Amendments made to policy and supporting text to reflect these points.</p> <p>Amendments made to policy and supporting text in the Revised Preferred Option.</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>care facilities to incorporate other community facilities including sport and recreation facilities. Indeed the text on page 121 refers to such a centre. The policy could be amended by seeking to support such co-located / integrated uses. Such facilities can help contribute to more active lifestyles, and also be used directly for physical activity referrals by healthcare professionals. There are opportunities to use the findings of a PPG17 audit and needs assessment to help shape the nature and location of such facilities. Likewise, there are opportunities for more efficient use of land and potential for reducing journeys by combining facilities on accessible sites.</p>	
Policy G4: Housing Mix, Density and Standards				
0018	Kensington Developments Ltd	94 Park View Road Lytham	Consider that the introduction of imposed housing mixes is arbitrary. It should be for the market to decide the exact mix of house types.	<p>This policy (now CS12 in the Revised Preferred Option) continues to provide substantial flexibility for the market to decide the mix of house types. Major flexibility exists on all sites below 2 hectares. The mix on larger sites reflects the need to better balance Blackpool's overall housing offer, informed by the findings of the Fylde Coast Strategic Housing Market Assessment, and Blackpool Housing Monitoring Reports.</p> <p>National guidance sets out that the proposed mix on larger sites should reflect the requirements for</p>

Resp No	Name/Company	Address	Comment	Council Response
				<p>different types and size of households, and should contribute towards the required mix on smaller sites.</p> <p>Reflecting the concerns raised, amendment has been made to the proposed mix on larger sites to allow some increased flexibility for market variation.</p>
0020	Lancashire County Council	County Hall PO Box 100 Preston	Fully support this policy.	Comment noted.
0024	Hay Hill Ltd	18-22 Wigmore Street London	<p>Housing density figures are now out of date following the publication of the Amended PPS3 in June 2010.</p> <p>Comment that the Housing Mix policy is overly prescriptive and undeliverable particularly if it is applied on a case by case basis. Needs to be consistent with the Housing Needs survey and re-evaluated in light of the revocation of the RSS and amended PPS3.</p>	<p>The policy has been amended to reflect the change in national policy. It does not set out a prescriptive minimum density, but aims to achieve a net density above 30 dwellings per hectare, while fully recognising and providing flexibility, particularly on smaller sites, where location, design and site characteristics considerations may outweigh density considerations.</p> <p>The policy continues to provide substantial flexibility for the market to decide the mix of house types. Major flexibility exists on all sites below 2 hectares. The mix on larger sites reflects the need to better balance Blackpool's overall housing offer, informed by the findings of the Fylde Coast Strategic Housing Market Assessment, and Blackpool Housing Monitoring Reports.</p> <p>National guidance sets out that the proposed mix on larger sites should reflect the requirements for</p>

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				<p>different types and size of households, and should contribute towards the required mix on smaller sites.</p> <p>Reflecting the concerns raised, amendment has been made to the proposed mix on larger sites to allow some increased flexibility for market variation.</p>
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	The Agency is generally supportive of focusing higher density housing provision within the main centres which provide the most sustainably accessible location and along key public transport corridors where they are well served by regular and efficient public transport services.	Comment noted.
0057	Government Office North West	City Tower Piccadilly Plaza Manchester	Justification needs to be provided for the house size (i.e. numbers of bedrooms) requirements which are out in this Policy.	The mix on sites reflects the need to better balance Blackpool's overall housing offer, informed by the findings of the Fylde Coast Strategic Housing Market Assessment, and Blackpool Housing Monitoring Reports.
Policy G5: Affordable and Supported Needs Housing				
0008	Ms Angelia Hinds	21 Moss House Road Blackpool	Comments that the strategy should commit to provide the necessary contributions towards affordable housing otherwise regeneration of the inner town will not occur.	It is a priority for the Council to ensure that there is an adequate supply of good quality affordable housing across the Borough. The Affordable Housing Policy and a supporting Supplementary Planning Document aims to maximise affordable housing provision to support Blackpool's regeneration objectives.
0018	Kensington Developments	94 Park View Road Lytham	Accept that obligation to provide an element of affordable housing however there is no basis put forward for the 30%	The Fylde Coast Strategic Housing Market Assessment (SHMA) supports a 30% affordable housing provision in Blackpool on sites of 15

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			<p>minimum.</p> <p>Insufficient recognition of the importance of the viability of developments is given in this policy. Provision of affordable housing should not prejudice the deliverability of schemes and should be explicitly stated in the justification of the policy.</p>	<p>dwellings or more as well as a contribution to off-site provision on smaller developments. An Affordable Housing Viability Appraisal has been undertaken in line with the requirements of national guidance, which demonstrates this is viable and will be made available as a public document. The appropriate size, type and tenure of affordable housing to be provided will be determined by a number of factors, which recognises the need to have direct regard to the economic viability of provision. An emerging Affordable Housing Supplementary Planning Document will provide more detailed guidance.</p>
0038	Natural England	Hornbeam House Electra Way Crewe Business Park Crewe	<p>Would welcome inclusion of a standard for access to green space in line with our own Natural England Accessible Greenspace Standards.</p> <p>Suggests inclusion of links to standards for Sustainable Drainage, even if in the supporting text.</p>	<p>Reference to the Natural England Accessible Greenspace Standards is made in the supporting text to policy CS6 of the Revised Preferred Option</p> <p>Policy S7 (re-numbered CS9 in the Revised Preferred Option) requires the Council to ensure that development proposals minimise flood risk and incorporate appropriate sustainable drainage systems and water retention methods.</p>
0046	Wyre Borough Council	Civic Centre Breck Road Poulton-le-Fylde	<p>Distinguishing between requirements for social rented and intermediate housing by area is commendable, subject to this approach being clearly evidenced.</p>	<p>Comment noted. The approach is supported by the SHMA and is further evidenced by the assessment undertaken to inform an emerging Affordable Housing Supplementary Planning Document.</p>
0057	Government office North West	City Tower Piccadilly Plaza Manchester	<p>States this Policy needs to set an overall (target for the amount of affordable housing to be provided, in accordance with PPS3 para 29.</p>	<p>The SHMA update is due to be published in Summer 2012 and this will provide an overall affordable housing target for Blackpool which will be detailed in the Pre-Submission Policy.</p>

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			The policy will also need to justify the 30% target for affordable housing. Its economic viability will need to be supported by a viability assessment, in the light of the Blyth Valley case. Notes that an SPD is being prepared and that it will include a detailed basis for an informed assessment of the economic viability of the targets for affordable housing and the thresholds set out in the Policy. Logically, the economic viability assessment should inform the Policy's target and thresholds; presumably the timing of the SPD/assessment will enable this to happen by the Reg 27 Publication stage.	An Affordable Housing Viability Appraisal has been undertaken and will be published as an evidence base document. This has informed the Core Strategy Policy and the emerging Affordable Housing Supplementary Planning Document, which will go out to consultation later in the year.
Policy G6: Gypsy and Travellers, and Travelling Showpeople				
0046	Wyre Borough Council	Civic Centre Breck Road Poulton-le-Fylde	The policy requires amendment to be consistent with national advice. Paragraph 31 of Circular 1/2006 Planning for Gypsy and Traveller Caravan Sites, states: "The core strategy should set out criteria for the location of gypsy and traveller sites which will be used to guide the allocation of sites in the relevant DPD. These criteria will also be used to meet unexpected demand."	The RSS Partial Review draft policy was based on a comprehensive assessment of need across the North West. The findings of the Panel after the Examination in Public confirmed and supported this position. Reflecting this, Policy G6 did not set out any requirement for additional provision of Gypsy and Traveller sites in Blackpool. Following the Government's proposed cancellation of Regional Strategies, the introduction of the Localism Act, and the new national planning policy for traveller sites, the policy has been amended, and replaced by a new criteria based policy which reflects these changes appropriate to Blackpool's

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0047	Lancashire Wildlife Trust	The Barn Berkeley Drive Preston	Supports the recommended change in wording to Policy G6 outlined in the Habitats Regulations Screening Assessment document produced by Bowland Ecology (March 2010) as part of the Council's Evidence Base.	specific circumstances. Following the Government's proposed cancellation of Regional Strategies, the introduction of the Localism Act, and the new national planning policy for traveller sites, the policy has been amended, and replaced by a new criteria based policy which reflects these changes appropriate to Blackpool's specific circumstances.
0057	Government Office North West	City Tower Piccadilly Plaza Manchester	In accordance with Circular 01/2006, the Core Strategy should set out criteria, for the location of gypsy and traveller sites, which will be used to guide the allocation of sites in the relevant DPD. These criteria will also be used to meet unexpected demand.	The RSS Partial Review draft policy was based on a comprehensive assessment of need across the North West. The findings of the Panel after the Examination in Public confirmed and supported this position. Reflecting this, Policy G6 did not set out any requirement for additional provision of Gypsy and Traveller sites in Blackpool. Following the Government's proposed cancellation of Regional Strategies, the introduction of the Localism Act, and the new national planning policy for traveller sites, the policy has been amended, and replaced by a new criteria based policy which reflects these changes appropriate to Blackpool's specific circumstances
0060	Fylde Borough Council	Town Hall Lytham St Annes	Suggest that the Preferred Option fails to address the provision of additional Gypsy and Traveller Accommodation. Following the revocation of RSS, Central Government has advised that local planning authorities may wish to use existing GTAAs as a starting point if they	The RSS Partial Review draft policy was itself based on the GTAA comprehensive assessment of need across the North West. The findings of the RSS Partial Review Examination in Public confirmed and supported Policy G6 which did not set out any requirement for additional provision of Gypsy and Traveller sites in Blackpool. This remains a material part of the evidence base, and the specific

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			wish to review levels of provision. You will also be aware that Fylde Borough Council lodged an objection to the levels of provision set out in the partial review of RSSNW which sought to redistribute the need established in the GTAA across the wider Fylde peninsula.	circumstances in Blackpool which justified this approach also remain the same. Following the Government's proposed cancellation of Regional Strategies, the introduction of the Localism Act, and the new national planning policy for traveller sites, the policy has been amended, and replaced by a new criteria based policy which reflects these changes appropriate to Blackpool's specific circumstances.
Policy G7: Protected Green Space				
0008	Ms Angelia Hinds	21 Moss House Road Blackpool	The development of the Moss goes against this policy and will go no way to safeguarding the remaining areas of open land and attractive landscaping which exists in the Borough.	The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option..
0023	Environment Agency	Lutra House Po Box 519 Preston	Support of this policy. However wildlife provisions should be incorporated such as wildlife corridors and 'stepping stones' such as ponds. Green corridors will link sites together allowing connectivity and species movement. Suggest the bullet point 'Other urban green space' be changed to 'Other urban green space and wildlife corridors and habitat'.	Part 1 (d) of Revised Core Strategy policy CS6 takes this into account.
0031	Sport England	Building 3 Universal Square	The objective of policy G7 strongly supported. However, it is unclear by	Part 2 of Revised Core Strategy policy CS6 takes this into account. Also policy CS10 'Planning

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		Devonshire Street Manchester	<p>what mechanism improvements would be secured. There is, for example, no reference to developer contributions being sought for such improvements.</p> <p>The importance of an up to date PPG17 compliant audit and assessment, supported or incorporating a playing pitch assessment / strategy should also be emphasised again as without such evidence it will not be possible to assess the appropriate quality, quantity and accessibility of such provision.</p> <p>Expresses that there is a degree of confusion between the relation of policy G7 and the existing Local Plan policies. Appendix C shows Local Plan policies BH5 and BH7 as being saved (i.e. not superseded), yet the role of these policies would appear to be to protect open spaces, playing fields and sports grounds like core strategy policy G7.</p> <p>Furthermore, Appendix C shows policy G7 as replacing Local Plan Policy BH6. Policy BH6, however, allocates areas for open space. Unclear how policy G7,</p>	<p>Obligations' refers to play areas, parks and spaces, ecology and nature conservation and sports facilities.</p> <p>The Blackpool Open Space, Sport and Recreation Audit and Position Statement (2009) sets out the quantum, quality, and accessibility of recreation open space provision across Blackpool. The audit provides a basis for assessing current and future need and recognises the priority to improve, enhance and remodel existing parks and open spaces.</p> <p>Policy G7 (now CS6) provides an overarching Core Strategy statement of the Council's intent and commitment to protect, improve and enhance the quality and value of existing greenspace in Blackpool. There is no conflict between saved Local Plan policies and Policy CS6. Policy CS6 does not replace Policies BH5 and BH7 which continue to provide further detail as to the Council's specific approach to its consideration of development proposals for existing public open spaces, playing fields and sports grounds.</p> <p>Local Plan policy BH6 is a site specific policy which will no longer be relevant to save as some sites have been implemented (and thus relevantly replaced by Revised Core Strategy policy CS6 (was</p>

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			which protects space, can replace a policy which allocates open space.	G7) which protects existing space) or are no longer being pursued. The Highfield Road/ Yeadon Way site (Policy BH6) is a council owned site and has not been implemented. Policies G7 and G8 have been combined into a single policy on 'Green Infrastructure' – CS6 in the revised Preferred Option.
0038	Natural England	Hornbeam House Electra Way Crewe Business Park Crewe	Welcomes this strong policy to protect and improve key green spaces within the borough. We would appreciate these sites being identified on any key diagrams.	Support noted. Existing green spaces are not a focus of the Core Strategy. While the importance of these sites was fully recognised in Policy G7 (now CS6), in the Blackpool context these sites are too numerous and detailed to be shown on the Key Diagram (the strategic focus of which needs to remain on the twin Core Strategy priorities of inner area regeneration and supporting South Blackpool growth). Reflecting its importance as the town's main park, Stanley Park will be identified on the Key Diagram.
0047	Lancashire Wildlife Trust	The Barn Berkeley Drive Preston	Would like to see clarification of the term 'sites of local nature conservation interest'. Perhaps distinguishing between statutory (e.g. SSSI) and non-statutory sites (Biological and Geological Heritage Sites), and including Local Nature Reserves (LNR) such as Marton Mere.	Part 3 of Revised Preferred Option policy CS6 deals with this.

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Policy G8: Green Infrastructure				
0013	Blackpool LSP Environment Sub-Group	Lutra House Dodd Way Walton Summit Preston	Supportive of this policy.	Comment noted.
0015	Bourne Leisure Ltd		Supportive of Policy G8, however the need to protect designated areas should be balanced with economic considerations and benefits. Policies on Green Infrastructure and their supporting text should recognise there is scope for appropriate development in designated sites such as nature reserves provided that commensurate mitigation measures are impacted to minimise both direct and indirect impacts.	<p>Comment noted. The policy appropriately sets out the overarching priority for the protection, enhancement and improvement of Green Infrastructure as an integrated component of Blackpool's regeneration and of future major developments.</p> <p>National Planning Policy and existing saved policies of the Blackpool Local Plan (Policies NE4 and NE5) will continue to provide further detail and set out the need for mitigation. However, this is only in exceptional circumstances and specifically it is not appropriate to generally balance economic considerations and benefits on the minority of lands which are specifically identified as designated sites.</p>
0023	Environment Agency	Lutra House PO Box 519 Preston	Supports this policy.	Comment noted.
0031	Sport England	Building 3 Universal Square Devonshire Street Manchester	This policy is supported in so far as it seeks to protect, enhance and increase provision of Green Infrastructure. However, it is somewhat unclear as to whether the protection element of this policy duplicates Policy G7. That is to say do all Green Spaces constitute Green	The emphasis of Policy G7 is on safeguarding existing greenspace - whereas the Policy G8 priority focus is on new provision, as well as the improvement and enhancement of existing parks and spaces. Whereas there is a distinction in emphasis between safeguarding and conservation, rather than a more active focus on recreation and

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			<p>Infrastructure? If so, there is perhaps a question as to whether policy G7 is needed.</p> <p>Further detail is needed on how the policy would operate. Specifically, the text of the policy itself simply states that “... enhancement and increased provision of Green Infrastructure will be promoted and pursued as an integral component of ... future major development”. Greater clarity would result from indicating that this would be achieved through on-site provision, off-site provision, financial contributions, a mixture of approaches etc.</p> <p>The final bullet point of the policy text seeks an expansion of community use of indoor and outdoor school recreation facilities. Whilst Sport England supports this policy aim, it appears to sit awkwardly under policy G8. That is to say indoor facilities, such as sports halls, would not be regarded by some as Green Infrastructure. Policy G3 might be a more appropriate location for this policy objective. I would also recommend that “recreation facilities” is amended to read</p>	<p>green infrastructure development, it is accepted there is overlap. Policies G7 and G8 have now been combined into a single policy on ‘Green Infrastructure’ in the Revised Preferred Option of the Plan.</p> <p>Part of Revised Preferred Option policy CS2 deals with this issue.</p> <p>Revised Preferred Option policy CS14 ‘Health and Education’ now deals with this issue.</p>

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			<p>“sport and recreation facilities”.</p> <p>The text supporting the policy also refers to a Blackpool Open Space, Sport and Recreation 2009 Audit and Position Statement. This document is not available on the Core Strategy Evidence Base web page, though. Furthermore, the name implies that only an audit of provision has taken place and not an assessment of current and future need.</p> <p>The adequacy of existing and future provision (in terms of quantity, quality and accessibility) cannot be assessed in the absence of need.</p>	<p>The 2009 Audit will be made available on the Council’s Core Strategy Evidence Base webpage in advance of the next stage public consultation. The detailed audit, as stated, sets out the quantum, quality, and accessibility of recreation open space provision across Blackpool, and is accepted provides a basis for but does not comprise a full assessment of current and future need in accordance with the NPPF. Policy on Green Infrastructure is appropriately informed by this detailed audit.</p> <p>The focus of the key proposals of the Core Strategy on inner area regeneration and supporting development in south Blackpool is not compromised by these limitations. The requirement is for the Core Strategy to be supported by an appropriate evidence base. The insufficiencies of green infrastructure within the inner areas is extreme and obvious, as are the limitations to address it in terms of available sites, and fully support the policy approach which is reflected throughout the document, and specifically in policy CS6 of the Revised Preferred Option.</p>
0038	Natural England	Hornbeam House Electra Way Crewe Business Park Crewe	<p>Generally supportive of this policy.</p> <p>We would like to see the supporting text make links between GI and climate</p>	Revised Preferred Option policy CS6 now deals with this issue.

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0044	Sustrans	St Pauls Centre Hightown Crewe	change Support this policy. Would like to see consideration made to providing greenways for shared pedestrian/cycle use as well as enhancing the walking network.	Part 1(d) of Revised Preferred Option policy CS6 now deals with this issue.
0047	Lancashire Wildlife Trust	The Barn Berkeley Drive Preston	Welcomes the priority afforded to Green Infrastructure. State that it is important that North - South linkages are developed and maintained, particularly with regards to coastal habitats. Such networks should be protected from development, and, where possible, strengthened by or integrated within it.	Comment noted.
Policy G9: Energy Requirements of New Development				
0013	Blackpool LSP Environment Sub-Group	Lutra House Dodd Way Walton Summit Preston	Supportive of this policy	Comment noted.
0018	Kensington Developments	94 Park View Road Lytham	The policy is aspirational and not measurable.	Policy G9 (now CS9) requires new or replacement buildings to achieve a 15% reduction in CO2 emissions <i>after</i> Building Regulations (Part L) compliance, which can be measured through the completion of design and as-built Building Control Compliance documentation clearly showing the Target Emission Rate (TER) and Dwelling Emission Rate (DER) /Building Emission Rate (BER).
0020	Lancashire County Council	County Hall PO Box 100	Supportive of this policy.	Comment noted.

Resp No	Name/Company	Address	Comment	Council Response
		Preston	The SA summary for the M55 hub proposal argues that given its urban edge location its sustainability is dependant on how rigorously sustainable design solutions are implemented. This could be reflected in the above policy through the use of lower thresholds and targets.	The Council is no longer pursuing development at the M55 hub. However, the thresholds identified were based on recommendations provided within the AECOM Climate Change and Renewable Energy Study (2010) which assessed the local circumstances. The scope of thresholds identified in this policy apply to all new development across the borough.
0023	Environment Agency	Lutra House PO Box 519 Preston	Supports this policy	Comment noted.
0035	Blackpool, Fylde and Wyre Economic Development Company		Fully support the aspiration of this policy; however the requirement for additional 15% reduction in CO2 emissions (beyond Building Regs compliance) in all new and replacement buildings could potentially stifle development investment in the immediate future. Suggest that some flexibility is provided to enable otherwise viable development whilst maximising energy performance.	As identified in the supporting text relating to policies G9, G10 and G11 (now CS9), exceptionally where a 15% CO2 reduction cannot cost effectively be achieved on site it may be accepted for a developer to make a commuted sum payment into to a carbon buyout fund for off-site CO2 reduction and energy provision.
0038	Natural England	Hornbeam House Electra Way Crewe Business Park Crewe	Supports this policy	Comment noted.
0057	Government Office North West	City Tower Piccadilly Plaza Manchester	Paragraph 26 of the Climate Change Supplement to PPS1 states that LPAs should have an evidence-based understanding of the local feasibility and potential for renewable and low-carbon	Comments noted and in line with the recommendations of the AECOM Climate Change and Renewable Energy Study, further clarification is provided in Revised Core Strategy policy CS9 in relation to the 15% reduction in CO ₂ emissions,

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			<p>technologies, including micro generation, to supply new development in their area, and that this may require them to make their own assessments.</p> <p>Drawing from this evidence base, LPAs should set out a target percentage of the energy to be used in new development to come from decentralised and renewable or low-carbon energy sources where it is viable. Paragraph 33 of the Supplement states that any policy relating to local requirements should be set out in a DPD.</p>	with specific reference made to energy efficiency measures, and the incorporation of on-site low carbon and renewable technologies and directly connected heat.
Policy G10: Sustainable Design, Layout and Construction				
0013	Blackpool LSP Environment Sub-Group	Lutra House Dodd Way Walton Summit Preston	<p>Requirement for Code level 3 not aspirational enough and would prefer to see Code level 4 as a minimum.</p> <p>Acknowledge commitment to produce an SPD but would like scope of the</p>	<p>The PPS1 Supplement allows local authorities to require levels of building sustainability in advance of those set nationally where local circumstances warrant them. Where local requirements go beyond national requirements, including Building Regulations, the evidence base must justify this based on local circumstances. The requirement for Code Level 3 is based on the recommendation of the AECOM Climate Change and Renewable Energy study which is based on an assessment of the local circumstances in Blackpool. To require code level 4, a further financial and technical feasibility assessment would be required.</p> <p>In terms of water efficiency, from April 2010 Building Regulations (Part G) requires that new</p>

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			document to be extended to include measures to improve water efficiency.	dwellings limit potential consumption of wholesome water to 125 litres per person per day. In addition to this, policy C9S now refers to measures to improve water efficiency.
0020	Lancashire County Council	County Hall Po Box 100 Preston	Supportive of this policy. The SA summary for the M55 hub proposal argues that given its urban edge location its sustainability is dependant on how rigorously sustainable design solutions are implemented. This could be reflected in the above policy through the use of lower thresholds and targets.	Comment noted. This level of development at the M55 hub is no longer being pursued by the Council with the emphasis now being on supporting the retention and enhancement of Marton Moss.
0023	Environment Agency	Lutra House Po Box 519 Preston	Supports this policy	Comment noted.
0038	Natural England	Hornbeam House Electra Way Crewe Business Park Crewe	Supports this policy.	Comment noted.
Policy G11: Strategic Site and Energy Requirements				
0020	Lancashire County Council	County Hall Po Box 100 Preston	Supportive of this policy. The SA summary for the M55 hub proposal argues that given its urban edge location its sustainability is dependant on how rigorously sustainable design solutions are implemented. This could be reflected in the above policy through the use of lower thresholds and targets.	Comment noted. This level of development is no longer being pursued by the Council with the emphasis now being on supporting the retention and enhancement of Marton Moss. The scope of thresholds identified in G10 (now CS9) applies to all new development across the borough.

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0038	Natural England	Hornbeam House Electra Way Crewe Business Park Crewe	Supports this policy but would like to see them cross referenced to earlier policies/supporting text in the document. Would welcome references in G11 to landscape character and quality; and biodiversity considerations being particularly relevant in scenarios considering such energy requirements.	Revised Core Strategy CS6 'Green Infrastructure' makes cross reference to Climate Change. Detailed criteria for the development of decentralised, renewable and low carbon energy will be developed as part of the Site Allocations and Development Management Development Plan Document.
0047	Lancashire Wildlife Trust	The Barn Berkeley Drive Preston	Supports the recommended change in wording to Policy G11 in relation to Wind Turbines as outlined in the Habitats Regulations Screening Assessment document produced by Bowland Ecology (March 2010) as part of the Council's Evidence Base.	Part 3 of Revised Preferred Option policy CS6 reflects this issue.

Chapter 8: Delivering the Vision

Resp No	Name/Company	Address	Comment	Council Response
Policy PO1: Planning Obligations				
0015	Bourne Leisure Ltd		Bourne Leisure considers that this supporting text should distinguish between the level of charges for different land uses. For example Tourism land uses should be charged less as they should not have to contribute to certain infrastructure such as education.	<p>Policy PO1 (CS10 in the Revised Preferred Option) set out the Council's commitment and provides the statutory planning policy basis in the Core Strategy for developments to only be permitted where the additional needs arising from developments are met.</p> <p>The Core Strategy recognises this is a priority, but it is the future detailed guidance which will determine the level of charges/ required provision for different land uses.</p>
0018	Kensington Developments	94 Park View Road Lytham	Reference to CIL is premature, given the new coalition government stated intention to abandon it. The principle of planning obligations to provide "required as opposed to desired" infrastructure is accepted.	The reference to CIL has been updated to reflect the latest position in the Revised Preferred Option.
0023	Environment Agency	Lutra House PO Box 519 Preston	Acknowledge that this policy will help delivery of new infrastructure; there still needs to be a practical solution identified to the drainage problems in the Borough.	Comment noted.
0026	Highways Agency	City Tower Piccadilly Plaza Manchester	The Agency is supportive of this policy and welcomes the use of the CIL as a mechanism for obtaining contributions from developers towards the cost of new or improved infrastructure, particularly where existing infrastructure is not	Comment noted.

Resp No	Name/Company	Address	Comment	Council Response
			sufficient to accommodate the proposed development.	
0028	The Theatres Trust	22 Charing Cross Road London	Would like the last bullet point on P141 to read 'other community and cultural facilities' to include arts and leisure.	'Leisure and Arts' has been added as a separate bullet to the list of examples of facilities funded via planning obligations.
0031	Sport England	Building 3 Universal Square Devonshire Street Manchester	Supportive of this policy. However, states that it is not entirely clear how it will be determined if existing infrastructure etc. is already sufficient (and therefore no obligation would be needed) or how additional need arising from the development would be assessed. The text following the policy states that new detailed guidance would be produced to implement a Community Infrastructure Levy. Prior to this, the intention is to continue to use planning obligations to meet infrastructure needs. However, there is no reference to what types of development would be required to contribute, what thresholds (if any would apply), how onsite / offsite provision and / or level of contributions would be determined. Is the intention to create supplementary planning documents to address such matters?	Support noted. Prior to new detailed guidance to implement a CIL, Planning Obligations would be used, with reliance on assessing individual planning applications against Policy PO1 and supporting policies of the Plan. All developments would be required to consider their wider impacts and be supported by appropriate measures to address consequent infrastructure, services and amenity requirements. There will be continuing reliance on the Council's existing SPG11 which sets out thresholds and how contributions would be determined to support future sports and recreational provision. This guidance will be revised and updated, and CIL implementation will address these issues and wider issues arising from any development.
0052	North and Western Lancashire Chamber of	1-2 Lockheed Court Amy Johnson Way	Suggests the range of partners involved in delivering the vision needs to be	Point noted. The Infrastructure and Delivery Plan will revise and review partners and

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	Commerce	Blackpool	revised in light of current spending restrictions. Budget proposals and ranking of priority activity would be helpful	implementation priorities of the Core Strategy.
0057	Government Office North West	City Tower Piccadilly Plaza Manchester	<p>After April 2014 (or after the earlier introduction of CIL by a LPA) contributions via S106 agreements can be sought to fund relevant infrastructure, as long as they meet the tests in Reg 122 of the CIL Regulations 2010; but planning obligations should relate to a particular development, whereas CIL contributions are for general infrastructure need.</p> <p>Third and fifth paragraphs on page 141 will need to be amended.</p> <p>PINS note of July 2009, following Shelagh Bussey's advisory visit, emphasised the importance of focusing on delivery. Where delivery might be uncertain, the Core Strategy Publication (Reg 27) document will need to demonstrate flexibility and set out what contingency plans are in place.</p> <p>Also, in the third paragraph of the Policy, we recommend that you change the word "sought" to "imposed", in relation to planning conditions.</p>	<p>The Revised Preferred Option has been amended in line with the CIL Regulations 2010.</p> <p>The Core Strategy document will demonstrate appropriate flexibility and set out further details in the Infrastructure and Delivery Document and supporting evidence.</p> <p>The policy wording will be amended to refer to planning contributions and/or CIL charges being sought (rather than planning conditions) to ensure requirements are met.</p>

Other Comments

Resp No	Name/Company	Address	Comment	Council Response
Other comments				
0003	The Coal Authority	200 Lichfield Lane Berry Hill Nottinghamshire	No Specific Comment on the Core Strategy as a whole.	Comment noted.
0004	Mr Malcolm Hicks	4 Princes Road Lowestoft	Fully supportive of plans to regenerate Blackpool for the 21st Century. However, objects to any potential closure of Blackpool South Station.	Comment noted. There is no intention to close the station in the Core Strategy, which emphasises the priority to improve the south Fylde line.
0005	4NW	Wigan Investment Centre Waterside Drive Wigan	Advise that there is now no obligation to consult 4NW on Local Development Frameworks and therefore no comments to make.	Comment noted.
0008	Ms Angelia Hinds	21 Moss House Road Blackpool	No detail provided on the Council's strategy to attract employment to Blackpool.	Policy S5 of the Preferred Option set out the Council's strategic priorities for employment development and economic diversification. Much of the focus of the resort regeneration and town centre policies of the Core Strategy will strengthen employment opportunities. Further enhancement of the focus for expanded employment opportunities in south Blackpool is now included in the Revised Preferred Option.
			Although the Preferred Option states that all areas of the town should desirably be accessible to significant and accessible areas of green space, the Council is not seeking to rectify the issue.	Revised Core Strategy Policy CS6 'Green Infrastructure' sets out priorities for the provision for Green Infrastructure with the intensely built up nature of Blackpool also necessitating a focus on improving quality and accessibility of provision.
			Asks if the Core Strategy will be revised due to the abolishment of the Regional	The Revised Preferred Option fully reflects the proposed abolition of the Regional Spatial Strategy.

Resp No	Name/Company	Address	Comment	Council Response
			<p>Spatial Strategy.</p> <p>The scale of new housing that can be met in the Inner Area is limited by the level of public funding potentially available.</p> <p>Strategic sites in the resort core are critical to the delivery of a new Blackpool but are costly to deliver and can only realistically come forward if supported by substantial public funded interventions and private sector investment.</p> <p>Asks whether the Council intends to introduce Private Finance Initiatives which have been used in other areas as an alternative source of funding.</p>	<p>The extent to which the quantum of regeneration may be affected by reduced availability of public funding is recognised and acknowledged in the Core Strategy. Further market based regeneration sites may come forward in line with the pace of Blackpool's regeneration.</p> <p>There is no awareness of any intention to introduce PFI initiatives for future housing sites.</p>
0010	Mr Alan Marshall	Foxes Farm Flat 7 Fairfield Road Poulton-le-Fylde	Comments that the Delivery and Implementation Plan does not have sufficient depth to convince the reader that the policy will achieve its objectives.	A much more detailed Infrastructure and Delivery Plan is being produced alongside the Pre-Submission edition of the Core Strategy.
0012	Blackpool Holiday Trades Association	Queen Victoria Hotel 60 Station Road Blackpool	A dual strategy should be implemented to halt and reverse the decline of the Inner Neighbourhoods and not just concentrate on the strategic projects within the Town Centre.	This need for a dual focus is fully supported and reflected throughout the Core Strategy.
0013	Blackpool LSP Environment Sub-Group	Lutra House Dodd Way Walton Summit Preston	Delivery and Implementation - Note in the indicator of success for Policy S6 a reference to 'changing biodiversity of safeguarded conservation sites'. Consider that this is too vague and should be changed to a measure of	This indicator has been amended in the Revised Preferred Option to reflect the AMR Core Indicator.

Resp No	Name/Company	Address	Comment	Council Response
			success that increases the number and diversity of species across the whole of Blackpool not just in designated conservation sites.	
0015	Bourne Leisure Ltd		Supports the recognition of Blackpool as a major tourism destination.	Comment noted, with the need to ensure a range of good quality tourism accommodation a clear priority of the Core Strategy.
			Also supports the identified challenge to "develop a unique 21st century resort offer" (page 12) but would add that a further challenge to be addressed, is the need to ensure a range of good quality tourism accommodation including Holiday Parks.	Policy CS20 of the Revised Preferred Option further reflects this need.
			Strongly supports the need for the enhancement of existing tourism accommodation and facilities, including Holiday Parks.	Comment noted.
0018	Kensington Developments	94 Park View Road Lytham	Figure 2 should include in the "Main Industrial Areas" the location of Whitehills Business Park giving a fuller picture of the existing spatial profile of the Borough and its opportunities notwithstanding its location outside of Blackpool.	The importance of Whitehills Park is recognised in the Core Strategy and specifically referred to in the supporting text. The focus of the Core Strategy as a statutory plan remains on the local authority area of Blackpool, and illustrative maps reflects this.
			The principles of the Council's intentions for the M55 Hub are supported, but will be difficult to achieve without the support of Fylde BC who to date have not been unequivocal in their support. Until	Comment noted. The figures have been reviewed following the Government's proposed revocation of RSS housing targets and the revised figures are supported by an ongoing and updated evidence base.

Resp No	Name/Company	Address	Comment	Council Response
			that support is given, there continues to be doubt over the deliverability of the development and thus there must be questions as to whether the residential elements meet the current requirements of Government advice.	The potential for wider development of lands in Fylde remains a matter to be determined by Fylde Borough Council as part of its own evolving Core Strategy process. The revised Blackpool Core Strategy proposals are clearly focused on South Blackpool itself, as against the wider "M55 Growth Point" in the Preferred Option document.
0020	Lancashire County Council	County Hall PO Box 100 Preston	The M55 Hub Masterplan needs to be reviewed and another option brought forward if the Masterplan was significantly changed.	The Council is no longer pursuing the M55 Hub. The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
0022	Network Rail		No issues. Network Rail is currently pursuing initial design discussion to improve its facility however raise concerns that the station's operation must not be compromised by the Council's desire the regenerate the wider area. The desired additions of a Tram link are understood but reserve their position to its acceptance subject to further studies.	Comment noted.
0023	Environment Agency	Lutra House Po Box 519	The Water Framework Directive is not considered in the Preferred Option.	Comment noted.

Resp No	Name/Company	Address	Comment	Council Response
		Preston	Spatial planning bodies can help deliver the Directives objectives by adopting policies that contribute to or support measures that need to be put in place to achieve 'good status'.	
0024	Hay Hill Ltd	18-22 Wigmore Street London	<p>Comment that some of the documents forming the evidence base are out of date specifically:</p> <ul style="list-style-type: none"> - the AMR, last updated Dec 09 - the SHLAA, last updated May 09 - the Visitor Accommodation Study Aug 09 <p>The draft policies have not taken into account changes to PPS4, PPS3, and PPS5.</p>	<p>The evidence base is continually being updated as appropriate and relevant to the development of the Core Strategy policies and proposals. The AMR, HMR, SHLAA have been updated annually, Other elements of the evidence base have also since been revised or completed.</p> <p>Changes in national planning guidance been reflected as appropriate in the Revised Preferred Option.</p>
0025	Mr John Ashworth	Runnell Cottage Chapel Road Blackpool	Fully supportive of the aims of the Core Strategy. Supportive of regeneration within Inner Blackpool and housing growth on Marton Moss/M55 Hub.	Comment noted.
0029	United Utilities	Thirlmere House Lingley Mere Warrington	<p>States that there are no supply/demand issues in the Blackpool area for water.</p> <p>For wastewater issues in Blackpool our scheme at Fleetwood waste water treatment works will be completed in November 2010. Any additional foul flows to the works once the scheme has been completed will not cause capacity problems however additional surface water flows to the works would cause</p>	This position is understood. The Infrastructure and Delivery Plan will set out the latest detailed information available on this matter.

Resp No	Name/Company	Address	Comment	Council Response
			<p>flooding problems and capacity problems at the works.</p> <p>This does not necessarily mean that we could not service development but surface water should not enter the combined sewer without causing further flood risk and pollution. If there was no opportunity to dispose of surface water to a soak away, watercourse or surface water sewer, then combined sewer Capacity may not be available.</p>	
0031	Sport England	Building 3 Universal Square Devonshire Street Manchester	Enquires as to the status of neighbourhood plans.	The status of future neighbourhood plans will be considered with regard to the evolving localism agenda, with flexibility to deliver plans most suited to different neighbourhoods as appropriate.
0033	National Grid		Identify a site on Clifton Road that is currently occupied but will be available for redevelopment during the plan period in line with PPS4.	The site on Clifton Road is allocated for industrial/business use by saved Policy DE1 of the Blackpool Local Plan post adoption of the Blackpool Core Strategy. Proposals for new development will be considered in the future when the site becomes available for redevelopment. The Revised Preferred Option will give increased emphasis to employment opportunities, including this location, as a focus for new development to meet needs within south Blackpool.
0035	Blackpool, Fylde & Wyre Economic Development Company		Given the social and economic impacts of the quality of new housing delivered in the town, there needs to be an explicit policy commitment to new housing design guidance. This will sit alongside	Policy CS7 of the Revised Preferred Option 'Quality of Design' specifically refers to the Council's intention to prepare a new housing design guide SPD.

Resp No	Name/Company	Address	Comment	Council Response
			the new guidance on residential conversions to provide comprehensive coverage in ensuring high standards for all new development.	
0039	Mr Brian Summers	5 Village Way Blackpool	<p>Supports the Core Strategy as a whole but questions whether it is realistic and deliverable.</p> <p>Concerned about the use of the Blackpool & Fylde College site being used for housing without reference to reappraising and upgrading the road network.</p> <p>Supporting of the aim to define 'holiday areas'</p> <p>Does not support the concept of shared space.</p>	<p>Comments noted. The Infrastructure and Delivery Plan will provide further details to support the deliverability of major new developments.</p> <p>The Blackpool and Fylde College (Bispham site) is no longer proposed for housing. The lack of funding means the potential relocation of the College closer to Blackpool town centre is no longer a possibility.</p>
0045	Mr Simon Marley	16 Leyfield Close Blackpool	Support of the Core Strategy as a whole particularly regeneration of the Inner neighbourhoods.	Comment noted.
0046	Wyre Borough Council	Civic Centre Breck Road Poulton-le-Fylde	Policies R7, R8, R10, R13, M1, M2, and M6 all identify strategic sites. Consideration could be given to reducing the number of strategic sites, particularly in view of doubts over the deliverability of aspirations for some sites.	The Revised Preferred Option reviewed these policies to reflect the deliverability and importance of strategic sites.
0047	Lancashire Wildlife trust	The Barn Berkeley Drive	The Trust supports the recommended change in wording to Policies S1/S3/S5	Comment noted.

Resp No	Name/Company	Address	Comment	Council Response
		Preston	outlined in the Habitats Regulations Screening Assessment document produced by Bowland Ecology (March 2010) as part of the Council's Evidence Base.	
0050	The Noble Organisation	1a Dukesway Court Team Valley Trading Estate Gateshead	The Core Strategy will need to be reviewed in light of the revocation of the RSS in particular with relation to casino uses.	RSS currently remains – but it is fully accepted there is a need to ensure its content is reviewed in line with evolving policy and changing national guidance.
0051	Mr Paul McEvoy	16 Silverwood Avenue Blackpool	Broadly agrees with the intentions of the Preferred Option. States there needs to be a focus on increased green spaces, sustainable homes and businesses and an attractive resort.	Comment noted.
0052	North and Western Lancashire Chamber of Commerce	1-2 Lockheed Court Amy Johnson Way Blackpool	Supports plans to develop the concept of a Central Business District to help reverse the drift of businesses away from the town centre.	Comment noted.
0053	Mr Lea	12 Strathdale Blackpool	<p>Raises concerns over the deliverability of the Vision.</p> <p>Suggests there is no need for any more large scale developments due to the revocation of the RSS.</p> <p>Amendments need to be made to the Core Strategy in light of recent government changes.</p> <p>Question where the employment opportunities are for people moving into</p>	Comments noted. The Revised Preferred Option has reviewed the strategic level of housing development to meet Blackpool's future needs, and provides further details of related employment opportunities.

Resp No	Name/Company	Address	Comment	Council Response
			<p>the proposed housing.</p> <p>Suggests that Blackpool should not rely on the large scale Tourism as it has done in the past</p>	
0057	Government Office North West	City Tower Piccadilly Plaza Manchester	<p>Strategic sites:</p> <p>The Core Strategy will need to be clear, in relation to the five strategic sites, on how the development will be delivered, such as by a masterplan and/or SPD. It will not, though, be appropriate to devolve all question of implementation down to a masterplan or SPD.</p> <p>If a strategic site is not shown in the Core Strategy to be deliverable, there is a question mark over the achievement of the Core Strategy.</p> <p>Recommend that the Core Strategy or its supporting evidence should indicate how much development is proposed at each strategic site, what the mix of land uses will be, together with information on constraints, infrastructure and phasing. The level of detail will in practice depend on when the site is expected to come forward. For a site anticipated in the early years of the Core Strategy there is an expectation that the detailed delivery</p>	<p>The Revised Preferred Option has reviewed all the strategic sites in line with these requirements – with further information on constraints, infrastructure and phasing set out in the Infrastructure and Delivery Plan which will be published alongside the Pre-Submission version of the Core Strategy.</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>matters such as availability and infrastructure requirements will have been resolved.</p>	
			<p>Housing Allocations:</p> <p>State that if Blackpool Council is still not proposing to prepare an Allocations DPD, the Core Strategy will need to explain how the LDF will fulfil the requirement of PPS3 paras 54 and 55 to identify a specific supply of housing land for the first 10 years and at least broad locations thereafter.</p>	<p>The Council will be preparing a Site Allocation and Development Management DPD on the adoption of the Core Strategy.</p>
			<p>Wording of policies:</p> <p>GONW recommend that, before prior to Publication stage, the policies are revisited as some are currently expressed as objectives. Consideration should be made to reword, combine with other policies or delete. Some examples (but not an exhaustive list) of such policies are S1, S2 and R6 - and see below re R2 and R4.</p> <p>States that Policy R2 is an example of a policy whose wording is rather aspirational/promotional. Recommend that wording is revisited before Publication stage, in a way which makes clear how and when the transformation</p>	<p>The Revised Preferred Option has reviewed the inclusion and wording of all policies.</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>is to come about.</p> <p>States that as well as being expressed as an objective, Policy R4 is worded in a rather vague way. Appreciate that the supporting text expands on the Council's priorities, but the Policy itself will need to be worded in a way which is deliverable and capable of implementation.</p>	
			<p>SA Summaries:</p> <p>It is unclear whether or not the recommendations from the SA have been taken up in the document. Recommends that this is considered in the Submission Document.</p>	<p>Recommendations have been considered and taken forward in the Core Strategy document. The Revised Preferred Option and supporting reports will further clarify and reflect the revised SA undertaken.</p>
			<p>Interface with Fylde Core Strategy:</p> <p>GONW note that close alignment through joint working with Fylde Borough Council is considered to be important in determining a coordinated development strategy for lands on the Blackpool/Fylde boundary.</p> <p>States the publication document will need to make clear what the contingency plan is if proposals for M55 Hub lands do not come forward as expected.</p>	<p>The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>The approach now taken is not dependent on any advance commitment or decisions of Fylde Borough Council about the future development of its lands.</p>

Resp No	Name/Company	Address	Comment	Council Response
0059	Karen Taylor	Themis Chambers Suite 14067 145-147 St Johns Street London	Suggest the Council has prioritised funding and regeneration on the town centre to the detriment of the inner neighbourhoods.	The major focus of the Core Strategy is on maximising regeneration across the resort, town centre, and inner area neighbourhoods. Deliverability of specific development proposals and programmes of improvements remain very much dependent on securing public funding. Every effort is being made across the board to deliver on all fronts. The Council sees these as complementary, rather than competing priorities. A regenerated town centre and resort can only benefit inner area regeneration and vice versa.
Area Based Policies				
0038	Natural England	Hornbeam House Electra Way Crewe Business Park Crewe	<p>We would welcome an element of the following in each policy:</p> <p>To conserve and enhance local landscape and townscape character and quality;</p> <p>To conserve and enhance biodiversity and geodiversity (including soils as a natural resource);</p> <p>To conserve and enhance GI resources and provide links between them; and</p> <p>Promoting walking and cycling routes within the urban centres (including the proposed M55 Hub), within Blackpool and beyond.</p>	<p>In general terms the broad requirement to conserve and enhance landscape and townscape character and quality; to conserve and enhance biodiversity; and to conserve and enhance Green Infrastructure resources are addressed in the overarching Policy CS6 of the Revised Preferred Option 'Green Infrastructure'.</p> <p>Reference to geodiversity has added to Policy CS6 of the Revised Preferred Option 'Green Infrastructure'.</p> <p>Similarly the Revised Preferred Option Policy CS5 (Connectivity) includes the need to promote provision of a network of cycle and pedestrian friendly routes across Blackpool.</p> <p>These themes are also reflected in the area based policies focused on South Blackpool, including</p>

Resp No	Name/Company	Address	Comment	Council Response
			<p>In any supporting text we would welcome reference to ecological data to alert developers to possible protected species and the need for ecological surveys being submitted with planning applications.</p>	<p>Policies CS27 (Marton Moss) and CS28 (South Blackpool Transport and Connectivity).</p> <p>Reference has been added to the supporting text to Policy CS27 'Marton Moss' to refer to the Phase 1 Habitats Survey ecological assessment that was completed in 2009 to identify species and habitats of importance on Marton Moss.</p>

Appendix F – Preferred Option: Consultation Responses

Preferred Option Public Exhibition Summaries

Resort Area: Foxhall

Event Venue: Blackpool Philharmonic Club, Foxhall Road, Blackpool

Date: Monday 14th June 2010

Time: 2pm-8pm

Council Officers Present:

Planning

Graham Page (Core Strategy Manager)
Helen Duignan (Planning Officer)
Katie Invernon (Assistant Planner)
Keeley Briggs (Assistant Planner)
Lyndsey Cookson (Planning Officer - Neighbourhood Plans)
Keith Keeley (Interim Regeneration Manager)

Accreditation

Jason Cotillard (Business Development Officer)

Enforcement

Karen Parker (Planning Enforcement Technician)
Garry Ivett (Housing Enforcement Officer)
Marion Dunne (Neighbourhood Enforcement Officer)

Housing

Steve Matthews (Head of Strategic Housing)

John Donnellon (Assistant Director - Housing, Planning and Transport)

Number of Attendees Recorded: 59

Responses

Total responses to Core Strategy:	20
Total responses to Holiday Accommodation SPD:	19
Total Questionnaire responses:	39

Public consultation/ Exhibition summary

The Foxhall consultation focussed particularly on concerns regarding mixed neighbourhoods, with a perception that holiday accommodation cannot co-exist with residential properties. The development of new budget hotels in the surrounding area was also considered to have a detrimental impact on guesthouses and B&Bs in the Foxhall area.

Reflecting recent work undertaken by the Council on the *Foxhall Preferred Option Area Action Plan* (July 2009), residents and business owners had concerns regarding the uncertainty of the area's future. In particular, this focused around Tyldesley Road, and the uncertainty relating to funding provision for the remodelling of this area. Whilst the future of Tyldesley Road is a key issue, this is not within the scope of the consultation for the Core Strategy or Holiday Areas.

The key regeneration issues in Foxhall are, as identified in the *Foxhall Area Action Plan Preferred Option report (2009)*, based around the decline in tourism, resulting in social and economic deprivation and a deteriorating urban environment.

Summary of responses

Core Strategy

- Requirement for more areas of green space (3)
- There is too much new (housing) development (1)
- Anti social behaviour (1)

Example quotes:

“The time frames are unrealistic”

“More help and advice on how to improve the areas whilst development takes place”

“The reduction in hotels will allow the hoteliers left for business to make a profit and be able to reinvest in their buildings”

Holiday Accommodation

- Blight (2)
- Need to Tackle HMOs (1)
- A need to improve standards and levels of accreditation (3)
- Too many new budget hotel developments (e.g. Travelodge etc) (5)
- Issues of converting holiday accommodation to residential, many properties are too large to convert to family homes or no money available (3)
- Mixed neighbourhoods and streets do not work (9)
- The Holiday Accommodation/Humberts Leisure data is inaccurate (2)

Example quotes:

“Introduce the Victorian feel slowly by converting some or one street into shop fronts selling Victorian wares and convert the top into a single dwelling...”

“Tyldesley Road and Rigby Road should be redeveloped for residential accommodation”

“The Foxhall area is wrong! It is hidden from view and will not get the expected footfall”

Other issues raised: A need for more family entertainment; Shortage of public toilets and litter bins; Many derelict buildings; Nothing happens following consultation events; A need to reshape the Rigby

Road site following the scrapping of the education campus; Improve roads, pavements, lighting and cctv.

Additional Comments: Less words, more action is needed;

	Yes	No	No Answer
Q1 Do you agree with the Vision?	12	7	1
Q2 Is it realistic?	7	10	3
Q5 Do you agree with the following Plan aims?			
<i>Sustainable regeneration, diversification and growth</i>	19	1	0
<i>Maximising regeneration</i>	19	1	0
<i>A balanced Healthier and Greener Blackpool</i>	17	1	2
<i>Providing supporting growth</i>	17	1	2
Q7 Have the Town Centre major priorities been correctly identified?	9	5	6
Q8 Have the Resort Renaissance major priorities been correctly identified?	8	3	9
Q9 Have the M55 Hub/Marton Moss major priorities been clearly identified?	7	5	8
Q10 Do you think that there is too much holiday accommodation in Blackpool?	16	1	3
Q11 Do you support the safeguarding of the Key Promenade Hotels and Frontages (policy R18)?	12	2	6
Q12 Irrespective of the boundaries, do you agree with the policy approach for Holiday Accommodation areas (policy R19)?	10	2	8
Q13 Have the balanced and greener Blackpool priorities correctly identified?	10	1	9

Resort Area: Town Centre North

Event Venue: Claremont First Steps Centre, Dickson Road, Blackpool

Date: Thursday 24th June 2010

Time: 2pm-8pm

Council Officers Present:

Planning

Graham Page (Core Strategy Manager)

Helen Duignan (Planning Officer)

Katie Invernon (Assistant Planner)

Keeley Briggs (Assistant Planner)

Accreditation

Jason Cotillard (Business Development Officer)

Enforcement

Sara Darbyshire (Planning Enforcement Technician)

Jennifer Clayton/Alex Bracken (Housing Enforcement)

Number of Attendees Recorded: 42

Responses

Total responses to Core Strategy: 16

Total responses to Holiday Accommodation SPD: 18

Total Questionnaire responses: 26

Public consultation/ Exhibition summary

The Lord Street consultation event focussed particularly on concerns regarding the inclusion of Lord Street in the holiday area and the removal of Banks Street. There were many concerns raised about property values once the designations were in place.

There was some apprehension regarding the concept of mixed neighbourhoods, with a perception that it tends to de-generate an area with HMOs and associated anti-social behaviour.

Summary of responses

Core Strategy

'Popular holiday areas seem to have been omitted in favour of less popular areas.'

'Some of the nicest hotels in Blackpool are located on the lower half of Banks Street, which is predominantly holiday accommodation.'

'Excluded areas will not be able to sell hotels at the right price and will not be able to obtain bank loans' (3)

'Enforce standards such as star ratings'

'Mixed Neighbourhoods don't work'

'We can't tackle poor quality housing until there is a huge money pot to do it.'

'Mixed Neighbourhoods are a good idea but present to mix tends to degenerate area with HMOs and un social behaviour'

'Get rid of the rundown hotels/guesthouses across all areas'

'Too many HMOs which need to be urgently tackled' (3)

'Will I be compensated for any loss of property value?'

'Leave Green areas alone'

'The Vision needs a firm timetable'

'Holiday accommodation should be along the Promenade and a distance back, not in pockets ie Lord Street'

'More greenery and public open space is required.'

'Lord Street is not currently a holiday area – lots of permanent accommodation already'

'Cant understand why Lord St, and York St are in the holiday area and Dickson Road and Cocker Street have been left out.'

Suggested Changes (Strategy)

None made

Suggested Changes (Boundaries)

- Add Banks Street (6)
- Block between Wilton and Derby Road including Dickson Road frontages should be included in the holiday area
- Include Pleasant Street on north side up to Braithwaite Street
- Remove Lord Street

North of the Town Centre in Lord Street

	Yes	No	No Answer
Q1 Do you agree with the Vision?	13	2	1
Q2 Is it realistic?	10	5	1
Q5 Do you agree with the following Plan aims?			
<i>Sustainable regeneration, diversification and growth</i>	16	0	0
<i>Maximising regeneration</i>	14	1	1
<i>A Balanced Healthier and Greener Blackpool</i>	14	0	2
<i>Providing supporting growth</i>	13	1	2
Q7 Have the Town Centre major priorities been correctly identified?	9	3	4
Q8 Have the Resort Renaissance major priorities been correctly identified?	9	2	5
Q9 Have the M55 Hub/Marton Moss major priorities been clearly identified?	8	1	7
Q10 Do you think that there is too much holiday accommodation in Blackpool?	11	4	1
Q11 Do you support the safeguarding of the Key Promenade Hotels and Frontages (policy R18)?	13	3	0
Q12 Irrespective of the boundaries, do you agree with the policy approach for Holiday Accommodation areas (policy R19)?	9	6	1
Q13 Have the balanced and greener Blackpool priorities correctly identified?	11	3	2

Resort Area: Norbreck, Bispham and North Shore Cliffs

Event Venue: The Savoy Hotel, Queen Promenade, Blackpool

Date: Monday 21st June 2010

Time: 2pm-8pm

Council Officers Present:

Planning

Graham Page (Core Strategy Manager)

Helen Duignan (Planning Officer)

Katie Invernon (Assistant Planner)

Keeley Briggs (Assistant Planner)

Accreditation

Colin Wolfendale (Training & Events Co-ordinator)

Enforcement

Nicci Rigby (Planning Enforcement Manager)

Jim Merridew/Trevor Marshall (Housing Enforcement Officer)

ReBlackpool

Ade Alao (Deputy Director of Housing Regeneration)

Number of Attendees Recorded: 28

Responses

Total responses to Core Strategy:	7
Total responses to Holiday Accommodation SPD:	8
Total Questionnaire responses:	15

Public consultation/ Exhibition summary

The main issue arising from the Norbreck, Bispham and North Shore Cliffs consultation focussed particularly on the omission of Gynn Avenue and Wilshaw Road from the Holiday Accommodation Areas.

It was acknowledged that a strong policy is required to encourage better standards of both residential and holiday accommodation and prevent HMOs.

Summary of responses

Too much poor quality holiday accommodation

Boundary should be amended to include Wilshaw Road. It is in a key position overlooking Gynn Gardens, near the Promenade. It attracts holidaymakers, particularly families and couples looking for quality accredited accommodation.

Any policy that encourages better standards of accommodation and rids Blackpool of seedy non-accredited accommodation has got to be good.

Strong policy required to rid proposed holiday areas of HMOs. A requirement for no HMOs should be extended to a mile radius of these areas.

Green areas such as Marton Moss should remain as fields and other areas regenerated first.

Suggested Changes (Strategy)

None made

Suggested Changes (Boundaries)

Add Willshaw Road (2)

Norbreck, Bispham and North Shore Cliffs

	Yes	No	No Answer
Q1 Do you agree with the Vision?	7	0	0
Q2 Is it realistic?	6	1	0
Q5 Do you agree with the following Plan aims?			
<i>Sustainable regeneration, diversification and growth</i>	7	0	0
<i>Maximising regeneration</i>	7	0	0
<i>A Balanced Healthier and Greener Blackpool</i>	7	0	0
<i>Providing supporting growth</i>	7	0	0
Q7 Have the Town Centre major priorities been correctly identified?	7	0	0
Q8 Have the Resort Renaissance major priorities been correctly identified?	7	0	0
Q9 Have the M55 Hub/Marton Moss major priorities been clearly identified?	5	1	1
Q10 Do you think that there is too much holiday accommodation in Blackpool?	7	0	0
Q11 Do you support the safeguarding of the Key Promenade Hotels and Frontages (policy R18)?	7	0	0
Q12 Irrespective of the boundaries, do you agree with the policy approach for Holiday Accommodation areas (policy R19)?	7	0	0
Q13 Have the balanced and greener Blackpool priorities correctly identified?	7	0	0

Resort Area: Pleasure Beach

Event Venue: Holy Trinity Church, Dean Street, Blackpool

Date: Monday 10th June 2010

Time: 2pm-8pm

Council Officers Present:

Planning

Graham Page (Core Strategy Manager)

Katie Invernon (Assistant Planner)

Keeley Briggs (Assistant Planner)

Keith Keeley (Interim Regeneration Manager)

Accreditation

Jason Cottillard (Business Development Officer)

Enforcement

Dave Bowling (Planning Enforcement Officer)

Garry Ivett (Housing Enforcement Officer)

Ivy Hardcastle (Housing Licensing Officer)

Jim Merridew (Housing Enforcement Officer)

Trevor Marshall (Housing Enforcement Officer)

Housing

Steve Matthews (Head of Strategic Housing)

John Donnellon (Assistant Director – Housing, Planning & Transport)

Number of Attendees Recorded: 30

Responses

Total responses to Core Strategy: 11

Total responses to Holiday Accommodation SPD: 13

Total Questionnaire responses: 24

Public consultation/ Exhibition summary

The Pleasure Beach consultation event focussed particularly on concerns regarding mixed neighbourhoods, with a perception that holiday accommodation cannot coexist with residential properties. Issues were raised in relation to the conversion of holiday accommodation into residential properties, particularly where properties were perceived to be too large to convert into residential use, and the financial implications of this on the property owner.

Some of the main concerns also centred on the prevalence of low quality holiday accommodation and the need to improve the standard of holiday accommodation provision and encourage accreditation. The development of new budget hotels in the surrounding area was also considered to have a detrimental impact on guesthouses operating in the Pleasure Beach area.

Summary of responses

Core Strategy

A need for more green space (2)

Not enough parking (1)

Too much new (housing) development (1)

A lot of anti social behaviour issues, particularly relating to alcohol, drugs, and violence. (3)

Example quotes:

“Make sure rail transport to Waterloo Road is kept. It is vital to local economy/tourists and locals”.

“Take it (the Vision) back to the drawing board”.

“Derelict properties should be the priority by changing or pulling them down”.

Holiday Accommodation

Blight (1)

Removal from the holiday areas will reduce property values (4)

Loss of Income following removal from holiday areas (2)

Tackle MOs (5)

A need to improve standards and levels of accreditation (3)

Too much poor quality holiday accommodation (6)

Stronger enforcement is needed (1)

Will there be grants or funding to convert to residential (1)

Too many new budget hotel developments (e.g. Travelodge etc) (5)

Issues of converting holiday accommodation to residential, many properties are too large to convert to family homes or no money available (3)

Mixed neighbourhoods and streets do not work (5)

Example quotes:

“Don’t turn old hotels/Guest Houses into residential houses. Who wants a 10 bedroom house with no parking and no garden!”

“Holiday makers and dossers do not mix”

“There are simply too many inferior accommodation properties: create a ‘standards’ strategy. Those who do not comply with this then close them down”

Other issues raised: Litter issues; Modernise Pleasure Beach; Modernise the illuminations; take the Core Strategy vision back to the drawing board; Prioritise the improvement of derelict buildings; Update the Piers and Pleasure Beach.

Additional Comments:

Suggested Changes (Strategy)

No boundaries (1)

Promenade boundaries only (1)

Suggested Changes (Boundaries)

Add	Dean Street (3)
	Osborne Road (2)
	Station Road (1)

Pleasure Beach

	Yes	No	No Answer
Q1 Do you agree with the Vision?	6	5	0
Q2 Is it realistic?	2	8	1
Q5 Do you agree with the following Plan aims?			
<i>Sustainable regeneration, diversification and growth</i>	7	4	0
<i>Maximising regeneration</i>	8	3	0
<i>A balanced Healthier and Greener Blackpool</i>	8	3	0
<i>Providing supporting growth</i>	7	3	1
Q7 Have the Town Centre major priorities been correctly identified?	5	1	5
Q8 Have the Resort Renaissance major priorities been correctly identified?	2	4	5
Q9 Have the M55 Hub/Marton Moss major priorities been clearly identified?	3	1	7
Q10 Do you think that there is too much holiday accommodation in Blackpool?	7	2	2
Q11 Do you support the safeguarding of the Key Promenade Hotels and Frontages (policy R18)?	4	4	3
Q12 Irrespective of the boundaries, do you agree with the policy approach for Holiday Accommodation areas (policy R19)?	3	6	2
Q13 Have the balanced and greener Blackpool priorities correctly identified?	5	3	3

Resort Area: South Beach

Event Venue: St Peter's Church, Lytham Road, Blackpool

Date: Monday 7th June 2010

Time: 2pm-8pm

Council Officers Present:

Planning

Graham Page (Core Strategy Manager)
Katie Invernon (Assistant Planner)
Keeley Briggs (Assistant Planner)
Keith Keeley (Interim Regeneration Manager)
Lyndsey Cookson (Planning Officer)

Accreditation

Jason Cottillard (Business Development Officer)
Colin Wolfendale (Training and Events Co-ordinator)

Enforcement

Jennifer Clayton (Housing Enforcement Officer)
Chris Cudlip (Housing Enforcement Officer)
Trevor Marshall (Housing Enforcement Officer)
Alex Bracken (Housing Enforcement Manager)

Housing

Steve Matthews (Head of Strategic Housing)

Ade Alao (ReBlackpool - Deputy Director of Housing Regeneration)
John Donnellon (Assistant Director – Housing, Planning & Transport)

Number of Attendees Recorded: 72

Responses

Total responses to Core Strategy:	29
Total responses to Holiday Accommodation SPD:	26
Total Questionnaire responses:	55

Public consultation/ Exhibition summary

The South Beach consultation event focussed particularly on concerns regarding mixed neighbourhoods, with a perception that holiday accommodation cannot coexist with residential properties. Issues were raised in relation to the conversion of holiday accommodation into residential properties, particularly where properties were perceived to be too large to convert into residential use, and also the financial implications of this on the property owner.

Some of the main concerns also centred on the prevalence of low quality holiday accommodation and the need to improve the standard of holiday accommodation and encourage accreditation.

The key regeneration issues, as set out in the *South Beach Area Action Plan - Issues and Options Report (2009)*, are to address the significant social and economic deprivation and poor environmental quality, in part resulting from the decline of tourism in the area.

Summary of responses

Core Strategy

Not enough parking provision (3)

Need more areas of green space (5)

More support of small/local businesses (4)

There is too much new (housing) development (2)

Is there any funding or grants available? (2)

Road network/Transport (2)

Anti social behaviour (1)

Example quotes:

“Council buy with reasonable offers all small hotels etc and larger ones that are running at a loss”

“I wouldn’t change anything about the Vision, but it would be nice to have a exhibition centre for visitors to Blackpool so they can see the future, and not just a building site”

“like integrated transport system”

Holiday Accommodation

Blight (1)

Property values will decrease outside the holiday areas (3)

Tackle HMOs (5)

A need to improve standards and encourage accreditation (7)

Poor quality holiday accommodation (10)

Stronger enforcement is needed (2)

Will there be any funding or grants made available to convert to residential (1)

Too many new budget hotel developments (e.g. Travelodge etc) (5)

Issues of converting holiday accommodation to residential, many properties are too large to convert to family homes (5)

Loss of Income/livelihood following removal from holiday areas (1)

Mixed neighbourhoods and streets do not work (7)

Example quotes:

“Need to get rid of sub standard and non-accredited guest houses”.

“Only support accredited properties regardless of where it is”.

“There should be no boundaries. Blackpool is a resort destination and any holiday accommodation provider that cannot run a profitable business should be allowed to change use of their property”.

Other issues raised: Too much rubbish on the streets; Lack of clear timescales; More comfortable benches required; Put the ‘Snow Dome’ on Central Drive; More road signage needed; Economic viability of purchasing properties on Crystal Road; Pavements often blocked by cars.

Additional Comments: FAQs were informative; Provide summary of ‘New Homes from Old Places’ document; Answers given were poor and rehearsed.

Suggested Changes (Strategy)

No boundaries (5)

Widen boundary (1)

Retain current boundaries (1)

Suggested Changes (Boundaries)

Add Shaw Road (1)
 Lonsdale Road (6)
 Alexandra Road (5)

Remove Wellington Road (1)

South Beach

	Yes	No	No Answer
Q1 Do you agree with the Vision?	18	5	3
Q2 Is it realistic?	8	13	5
Q5 Do you agree with the following Plan aims?			
<i>Sustainable regeneration, diversification and growth</i>	24	1	1
<i>Maximising regeneration</i>	21	4	1
<i>A Balanced Healthier and Greener Blackpool</i>	24	1	1
<i>Providing supporting growth</i>	24	1	1
Q7 Have the Town Centre major priorities been correctly identified?	10	10	6
Q8 Have the Resort Renaissance major priorities been correctly identified?	9	10	7
Q9 Have the M55 Hub/Marton Moss major priorities been clearly identified?	12	5	9
Q10 Do you think that there is too much holiday accommodation in Blackpool?	20	4	2
Q11 Do you support the safeguarding of the Key Promenade Hotels and Frontages (policy R18)?	16	6	4
Q12 Irrespective of the boundaries, do you agree with the policy approach for Holiday Accommodation areas (policy R19)?	12	12	2
Q13 Have the balanced and greener Blackpool priorities correctly identified?	15	3	8

Marton Moss Exhibition

Event Venue: Our Lady of The Assumption Church Hall, Common Edge Road

Date: Thursday 17th June 2010

Time: 2pm-8pm

Council Officers Present:

Planning

Graham Page (Core Strategy Manager)

Helen Duignan (Planning Officer)

Katie Invernon (Assistant Planner)

Keeley Briggs (Assistant Planner)

Keith Keeley (Neighbourhood Plans Manager)

Number of Attendees Recorded: 21

The Marton Moss/M55 Hub consultation event specifically focussed on the proposals in the Core Strategy relating to new housing provision in Blackpool.

Specific Comments

-Core Strategy

- Against proposed new homes on Marton Moss. Prefers the upgrading of Foxhall and other rundown parts of the town.
- Entrances into the town need to be enhanced to give a better approach.
- The guesthouse era is finished and Blackpool needs to recognise this.
- Agreement with the Green Belt extension
- Would like to see more Park and Ride facilities and improved bus services
- Agree that employment markets could be addressed on part of M55 Hub
- Conferences can be counter-productive due to the cost of security and disruption to local facilities.
- There is a need for new conference facilities.
- Too many hard surfaces across Blackpool. We need more greenery.
- Supportive of plans to prevent HMO's

- Short term solutions needed to 'tidy up' areas
- There should be a mix of holiday and residential across all areas.
- Open space should be provided north of school road

- Marton Moss/M55 Hub

- General agreement with the Green Belt extension.
- Marton Moss is an important green area for people who live in the area.
- Housing development would destroy the character of the Moss.
- Inners area regeneration should be the priority
- Where will the demand be for all the new houses?
- Brownfield development should be explored before greenfield
- Green areas should be retained
- What about employment growth?
- New housing is not required. It can be achieved without developing greenfield sites. There is a shortage of affordable and social housing only.
- The land could be used for allotments, eco tourism and parks rather than housing.

Marton Moss Questionnaire responses

	Yes	No	No Answer
Q1 Do you agree there is a need for some new housing to meet the needs, over and above the range and scale of housing that can be provided in Blackpool's Inner Areas?	0	9	1
Q2 Do you agree with the reasons set out of why Blackpool needs supporting growth?	3	2	5
Q3 Where do you consider the needs for new housing should be best met?			
In the main towns and cities	9	0	1
On the edge of main towns and cities	1	6	3
In or on the edge of smaller towns and villages	2	5	3
In the countryside	0	7	3
In Green Belts or other areas with special protection	0	7	3
Q4 Within Blackpool, do you agree with the focus for new housing on the following areas?			
Central Blackpool inner area development sites	10	0	0
Other sites elsewhere in the urban area	7	3	0
Conversion of existing properties	10	0	0
New housing at Marton Moss/M55 Hub	0	10	0
Q5 Would you support the concept of wider development of the M55 Hub including lands outside Blackpool	1	9	0
Q6 On the Moss within Blackpool, do you support the development of:			
Lands between Bennetts Lane and Progress Way	0	9	1
Lands between Yeadon and Progress Way	0	9	1
Lands between Progress Way and School Road	0	9	1
Q7 Do you support the extension of the Greenbelt south of School Road?	7	3	0

Core Strategy Questionnaire Responses for Marton Moss

	Yes	No	No Answer
Q1 Do you agree with the Vision?	7	0	0
Q2 Is it realistic?	3	3	1
Q5 Do you agree with the following Plan aims?			
<i>Sustainable regeneration, diversification and growth</i>	5	0	2
<i>Maximising regeneration</i>	7	0	0
<i>A balanced Healthier and Greener Blackpool</i>	6	1	0
<i>Providing supporting growth</i>	2	4	1
Q7 Have the Town Centre major priorities been correctly identified?	5	2	0
Q8 Have the Resort Renaissance major priorities been correctly identified?	4	2	1
Q9 Have the M55 Hub/Marton Moss major priorities been clearly identified?	1	5	1
Q10 Do you think that there is too much holiday accommodation in Blackpool?	7	0	0
Q11 Do you support the safeguarding of the Key Promenade Hotels and Frontages (policy R18)?	6	1	0
Q12 Irrespective of the boundaries, do you agree with the policy approach for Holiday Accommodation areas (policy R19)?	5	1	1
Q13 Have the balanced and greener Blackpool priorities correctly identified?	2	3	2

Appendix G – Additional Consultation November 2010 - The Need for New Homes to 2027: Consultation Material

Map of Marton Moss properties notified by letter



Letter Sent to Marton Moss households



Our Ref: CS Housing Consultation
Date: 8th November 2010

Dear Sir / Madam

BLACKPOOL CORE STRATEGY - THE NEED FOR NEW HOMES TO 2027

You may be aware that Blackpool Council's Core Strategy Preferred Option went out to consultation in the summer. In response to all the consultation responses received and in light of the revocation of the Regional Housing figures we have prepared a new report setting out proposed new housing requirements for Blackpool to 2027.

The key change affecting Marton Moss is that no lands south of Progress Way are now proposed for residential development.

Further details are found in the attached summary. The full report can be viewed on the Council's website at: www.blackpool.gov.uk/corestrategy2010 or at the following locations during normal opening hours (copies of comments forms are also available):

- Customer First Reception, Municipal Buildings, Corporation Street
- Palatine Library, St Annes Road

Public consultation starts on Monday 8th November and ends on Monday 6th December 2010.

Comments can be made by completing the attached comments form or by sending in a letter or email. These should be returned by post or email to: Planning Department, Blackpool Council, PO Box 17, Corporation Street, Blackpool, FY1 1LZ or development.plans@blackpool.gov.uk.

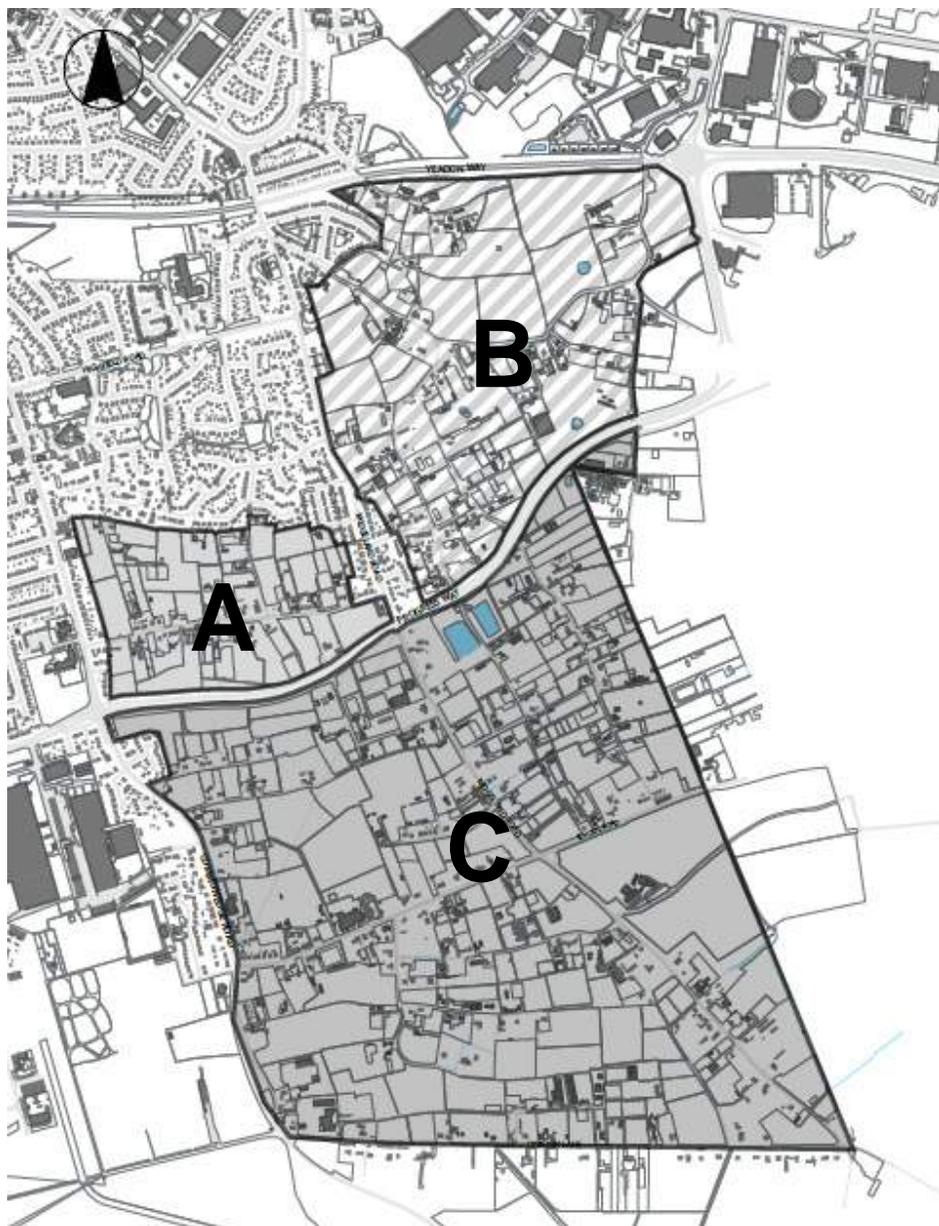
All comments should be received by **5pm, Monday 8th December 2010**.

All comments received will be considered and further changes may be made to reflect these comments before finalising the full revised Core Strategy Publication Edition early in 2011.

If you would like any further information please contact the Development Plans and Team: Tel: 01253 476009 or email: development.plans@blackpool.gov.uk.

Yours faithfully

Graham Page
Core Strategy Manager



Area A: Land at Moss House Road

Planning permission was granted for 584 houses in July 2010 (subject to an application for Judicial Review).

Area B: Lands between Yeadon Way and Progress Way, east of Midgeland Road.

Allocated for housing development in the period 2016-2026 to provide for around 900 new homes.

Area C: South of Progress Way

Safeguard the predominantly more open green and distinctive character.

Maintain a restrictive policy towards the construction of new buildings.

Relax the policy towards extensions and replacement of existing dwellings and the conversion of existing appropriate buildings providing they are consistent with its open and remaining rural character.

Maintain open aspects across the Moss, remove eyesores, and pursue proposals for landscape and built enhancement which improve the interest and value of the Moss.

We want your comments!

Name:.....

.....

Address:.....

.....

.....

Email address:

.....

.....

Do you support or object to the proposals for:

Support

Object

Area B: Lands between Yeadon Way and
Progress Way, east of Midgeland Road.

Area C: South of Progress Way

Support

Object

Any further comments?

Please complete and then return by post to:

Development Plans
PO Box 17
Corporation Street
Blackpool
FY1 1LZ

Or scan your response and email to:
development.plans@blackpool.gov.uk

Email sent to all those on the consultation database
Sent: Mon 8th November 2010



We want your views!

Blackpool Council is currently consulting on: **BLACKPOOL CORE STRATEGY - THE NEED FOR NEW HOMES TO 2027**

You may be aware that Blackpool Council's Core Strategy Preferred Option went out to consultation in the summer. In response to all the consultation responses received and in light of the revocation of the Regional Housing figures we have prepared a new report setting out proposed new housing requirements for Blackpool to 2027.

Key Changes include:

- To no longer propose to allocate for residential development:
 - Lands between Progress Way & School Road
 - Land at Whyndyke Farm
- To no longer propose an extension to the Green Belt south of School Road, with very restrictive policies on any future development.
- To instead safeguard the open character of all the lands south of Progress Way with some limited relaxation of policy.
- To reflect planning permission granted for land at Moss House Road (subject to Judicial Review)

Public consultation starts on Monday 8th November and ends on Monday 6th December 2010.

Please go to <http://consult.blackpool.gov.uk/portal> to view and comment.



Blackpool Core Strategy

Blackpool Council is preparing the Core Strategy – which seeks to provide a planning framework to secure real social, physical and economic change for a prosperous and healthier Blackpool.

The **Core Strategy Preferred Option** was consulted upon in Summer 2010 and set out the Council's strategic development proposals to deliver the Council's vision for Blackpool in 2026. The Core Strategy includes:

- *Promoting a 21st century resort and town centre offer*
- *The regeneration of the resort neighbourhoods*
- *A higher quality and more focused holiday accommodation sector*
- *Supporting growth at Marton Moss to enhance housing quality and choice*
- *A range of other supporting housing, social, economic and community policies to secure a prosperous, healthier and greener Blackpool.*

The report and accompanying documents can be viewed below.

THE BLACKPOOL CORE STRATEGY - THE NEED FOR NEW HOMES TO 2027

The Blackpool Core Strategy - The Need for New Homes to 2027 Report has been approved by the Council for public consultation and sets out proposed new housing requirements for Blackpool for 2027.

Where to view The Need for New Homes to 2027

We are keen to hear your views on this report. The period for making comments on the document is:

Monday 8th November 2010 to Monday 6th December 2010.

The report can be viewed using the links below or from the following locations during normal opening hours (copies of comments forms are also available):

- Customer First Reception, Municipal Buildings, Corporation Street.
- Palatine Library, St Annes Road

How to Comment

It is important the views of Blackpool's residents, businesses, organisations and other interests are made known to us to help us together to shape Blackpool's future development. There are 3 main ways by which you can choose to make comments on the Council's Housing Report:

1. Make comments directly on the Council's on-line consultation version of the document using [this link](#)
2. Downloading and completing a copy of the "Comments Form" from [this link](#)
3. Using the Comments Form available direct from Customer First or Palatine Library

What Happens Next

Following consideration of all comments on the Housing Report, the Council will publish its Core Strategy Document which, after final consultation will be submitted to the Secretary of State. An independently appointed Inspector will then examine the Core Strategy, whose recommendations will be binding on the Council and incorporated into the Adopted Blackpool Core Strategy for the future development of Blackpool to 2027.

DOCUMENTS AVAILABLE – TO VIEW ON LINE

Blackpool Core Strategy - The Need for New Homes to 2027

- [The Need for New Homes Report](#)
- [Marton Moss Summary](#)
- [Comments Form](#)

Core Strategy - Preferred Option

- [The Core Strategy Preferred Option](#)

and supporting documents:

- [Core Strategy Issues and Options June 2008](#)
- [Reports to Council on Issues and Options \(February, March and July 2009\)](#)
- [Sustainability Appraisal of Blackpool Core Strategy](#)
- [Sustainability Appraisal of Blackpool Core Strategy - Final](#)
- [Sustainability Appraisal Appendices of Blackpool Core Strategy](#)
- [Sustainability Appraisal Non Technical Summary of Blackpool Core Strategy - Final](#)
- [Habitat Regulations Scoping Report](#)
- [Equality Impact Assessment](#)
- [Core Strategy Exhibition Boards](#)
- [Core Strategy Questionnaire](#)
- [Marton Moss Exhibition Boards](#)
- [Marton Moss Questionnaire](#)

Evidence Base

The Blackpool Core Strategy is also informed by a comprehensive "[Evidence Base](#)" comprising a number of detailed assessments of housing, employment, environment and

other aspects of the current health and character of the Fylde Coast Sub-Region, along with more specific studies focused on Blackpool itself.

Details of the various reports completed to date are available to view using [this link](#)

Other Planning Documents

The Core Strategy is being prepared as the Council's lead planning document setting out the Council's draft strategic policies and development proposals to deliver the Council's vision for Blackpool in 2026. It also lays the foundation for more detailed policy development in other supporting development plan documents, which can be viewed using these links

- [Holiday Accommodation Supplementary Planning Document](#)
- [New Homes from Old Places Supplementary Planning Document](#)

Did you find what you were looking for?

If you can't find what you were looking for on our site and have tried the [A-Z of Services](#) and our [Site Search](#), please fill in our online ['Contact Us' form](#) to let us know about this.

Your views are important to us and letting us know what you were unable to find will help us to improve the range and quality of information we provide for you.

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Core Strategy Statement of Consultation

Appendix H – Interim Housing Consultation: Consultation Responses

Blackpool Council

The Need for New Homes to 2027

Consultation November-December 2010

Schedule of Representations

Blackpool Council



ID	Name	Address	Do you support or object to the proposals for: - Area B: Lands between Yeadon Way and Progress Way, east of Midgeland Road	Do you support or object to the proposals for: - Area C: South of Progress Way	Further comments	Council Response
CSH1	Terry Regan	34 Lincoln Road Blackpool FY1 4HB	Object	Object	<p>Concentrate on redeveloping the multitude of so called "brownfield" sites, many of which are fast becoming eyesores. For instance the large and prominent site of the former hospital situated at the junction of Devonshire and Talbot roads.</p> <p>We need open green spaces such as those on the Moss - especially as we are nowadays supposed to be a green town. Not only that the waterlogged ground on the moss which, in many ways resembles a flood plain is NOT the best location for large housing development, I am totally opposed to the proposed housing developments on the moss!</p>	<p>Regeneration of inner Blackpool is a key priority for the Council as set out in Revised Preferred Option Policy CS1: Strategic Location for Development. In addition, of the revised housing provision of 4500 new dwellings in Policy CS2 around 76 % is focused on brownfield including the Devonshire Road hospital site, and other inner area regeneration sites.</p> <p>The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p>
CSH2	V Oshea	49 Portree Road	Object	Support	I believe that most development should take	Regeneration of inner Blackpool is a key priority for the Council as set out

ID	Name	Address	Do you support or object to the proposals for: - Area B: Lands between Yeadon Way and Progress Way, east of Midgeland Road	Do you support or object to the proposals for: - Area C: South of Progress Way	Further comments	Council Response
		Blackpool FY2 0DG			place on brownfield, urban areas. Too much green space is being swallowed up by housing and business development.	<p>in Revised Preferred Option Policy CS1: Strategic Location for Development. In addition, of the revised housing provision of 4500 new dwellings in Policy CS2 around 76% is brownfield development.</p> <p>With respect to Green Open Space Policy CS6: Green Infrastructure provides protection to existing green infrastructure networks.</p>
CSH3	Mr Charles Lea	" Warlea " 12 Strathdale Blackpool FY4 5BB	Object	Object	<p>We all need to look at the bigger picture, not just in isolation with regards to housing stock needs up to & including 2027 and beyond.</p> <p>Up until late 1960's and 1970's Blackpool & the Fylde were family holiday destinations. This have now all changed with cheap air travel & foreign holidays.</p> <p>From the late 1980's and during the 1990's there were a large drop in numbers visiting Blackpool for five/seven day holidays, now during the late 2000 and up to 2010 people</p>	Comments noted.

ID	Name	Address	Do you support or object to the proposals for: - Area B: Lands between Yeadon Way and Progress Way, east of Midgeland Road	Do you support or object to the proposals for: - Area C: South of Progress Way	Further comments	Council Response
					<p>now visit Blackpool for no more than one or two days or even just for a few hours.</p> <p>No matter how much money is thrown at Blackpool holiday industry the good old days will never return. We must move on, no looking back.</p> <p>With regards to the need for housing within Blackpool and the Fylde we need not look further than ALL the empty holiday accommodation left empty also empty shops & small terrace houses.</p> <p>What we cannot do is build land, we are an Island with ever increasing population that need affordable housing stock. But not at the expense of losing large sways of land (Greenbelt) once we lose this green belt is has gone for good.</p>	<p>Regeneration of inner Blackpool is a key priority for the Council as set out in Revised Preferred Option Policy CS1: Strategic Location for Development. In addition, of the revised housing provision of 4500 new dwellings in Policy CS2 around 76% is brownfield development including 1000 from conversion of holiday accommodation to residential use.</p> <p>The Revised Preferred Option does not allocate any development on Green Belt or propose to change the Green Belt boundary.</p>

ID	Name	Address	Do you support or object to the proposals for: - Area B: Lands between Yeadon Way and Progress Way, east of Midgeland Road	Do you support or object to the proposals for: - Area C: South of Progress Way	Further comments	Council Response
					<p>Blackpool & Fylde has a high unemployment levels and a high O.A.P's levels both of which need a large number of social housing, with this in mind the very nature of Blackpool and its large number of people employed in the leisure industry that are by the very nature flexible and change.</p> <p>The total amount of spends by the council to fulfill its obligations to its rate payers leaves us with a big deficit. One in which the rate payers of Blackpool are heavily subsidizing people who do not work or contribute to the prosperity of Blackpool.</p> <p>The high unemployment levels in Blackpool have risen to an unacceptable level, not just in Blackpool but in the U.K with approx 4.2 million people out of work. In the present climate and the foreseeable</p>	<p>Whilst the visitor economy will continue to underpin Blackpool's economy and remains a key growth are, it is recognised that there is the need to strengthen economic prosperity through supporting business growth and attract new investment to provide sustainable jobs in other employment sectors than leisure. Policy CS3: Economic Development and Employment identifies those areas which provide the opportunity for future economic growth as well as focusing on improving the skills of Blackpool residents to access the new jobs. Policy CS25 South Blackpool Employment Growth further expands on the opportunities in this area.</p>

ID	Name	Address	Do you support or object to the proposals for: - Area B: Lands between Yeadon Way and Progress Way, east of Midgeland Road	Do you support or object to the proposals for: - Area C: South of Progress Way	Further comments	Council Response
					<p>future this figure will rise.</p> <p>You state that it would be short sighted of the Council not to plan for the future, if the number of houses that are proposed is allowed to be built, whom is going to buy these with no jobs. They will remain empty for years, building societies are not lending first time buyers cannot afford these prices nor is Blackpool council building any council housing.</p> <p>We have large areas within Blackpool which must be considered i.e.: Brown field sites and regeneration of inner Blackpool. Comments made are it is cheaper to buy green field land than compulsory purchase property and land, also it is cheaper than having to redevelop brown field sites.</p>	<p>Refer to previous comment on brownfield development.</p>
CSH4	Elaine Smith	62 Preston New Rd Blackpool FY4 4HG	Support	Object	-	-

ID	Name	Address	Do you support or object to the proposals for: - Area B: Lands between Yeadon Way and Progress Way, east of Midgeland Road	Do you support or object to the proposals for: - Area C: South of Progress Way	Further comments	Council Response
CSH5	Barry McCann	8 Prescot Place Blackpool FY3 9TE.	Object	Object	Any future developments should concentrate on brownfield sites such as the former Devonshire Road Hospital. Fertile green sites need to be preserved. We have lost too much as it is.	<p>Regeneration of inner Blackpool is a key priority for the Council as set out in Revised Preferred Option Policy CS1: Strategic Location for Development. In addition, of the revised housing provision of 4500 new dwellings in Policy CS2 around 76% is brownfield development including the Devonshire Road hospital site, and other inner area regeneration sites.</p> <p>The Revised Preferred Option does not allocate any housing on the remaining lands of the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p>

ID	Name	Address	Do you support or object to the proposals for: - Area B: Lands between Yeadon Way and Progress Way, east of Midgeland Road	Do you support or object to the proposals for: - Area C: South of Progress Way	Further comments	Council Response
CSH6	Ian Barke	33 Helmsdale Road Blackpool FY4 5AR	Object	Object	This survey misses an important point - it should ask whether I support the development in the area of Moss House Road. I am against this development and any other damage to the few remaining areas of countryside in Blackpool when there is so much brownfield land and poor housing that could be redeveloped. I have recorded objections to the above decisions because I am opposed to the thrust of the policy to carve up Blackpool's countryside. The strategy needs a rethink, especially in view of the dubious way in which the decisions have been reached and the clear linkage between the developer and the ruling party.	The planning application for lands at Moss House Road has been approved by the Council. With respect to the remaining lands at the Moss, the Revised Preferred Option does not allocate any housing. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
CSH7	David Nield	66 Faringdon Avenue Blackpool FY4 3QJ	Object	Object	-	-
CSH8	M.Edwards	19 Lunedale Avenue	Support	Support	Support proposals for use of central 'brown' sites to	Support noted.

ID	Name	Address	Do you support or object to the proposals for: - Area B: Lands between Yeadon Way and Progress Way, east of Midgeland Road	Do you support or object to the proposals for: - Area C: South of Progress Way	Further comments	Council Response
		Blackpool FY1 6LL			provide required affordable housing	
CSH9	David Wells	338 Midgeland Road Blackpool FY4 5HZ	Support	Support	Planners seem to have forgotten that even people living on the Marton Moss need to go to the shops. It is essential that developers are made to provide shops on the new developments, instead of row upon row of new houses. Shops and a park are necessary evils needed by the general public, especially those with no cars. At present we have one bus an hour (Number 10) SUNDAYS AND BANK HOLIDAYS EXCEPTED! Bus stops and a more frequent service should be a requirement of building new homes. Otherwise you have my support.	A new convenience shop is proposed in the outline planning permission for development at Moss House Road. New local shopping provision, green spaces and high quality landscaping will be required as part of any new housing development. A comprehensive transport assessment will be required to accompany any planning application for new housing which will include improvements to public transport.
CSH10	Julie Savage	30 Clifton Ave Blackpool FY4 4RF	Object	Object	-	-
CSH11	Pat Hawkins	14, Dunes Ave Blackpool FY4 1PY	Object	Object	As stated before, continued development of housing, especially social, only provides more homes encouraging more dependant people to be	The Core Strategy is seeking to address current imbalances of Blackpool's housing market, both in South Blackpool and by addressing the high levels of poor quality rented

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					<p>attracted to the town. We already have a considerable number of in comers who require a great deal of support, i.e. financial, medical. With the new budget restraints we should concentrate funds on supporting the residents and families who have lived in Blackpool for the majority of their lives.</p> <p>Any proposed funding should be used to support local business and improve the educational skills so that the unemployed youth are capable of filling training places.</p>	<p>accommodation in the inner areas. The emphasis of proposals is to deliver a better choice that will appeal to a wider range of households. Properties in South Blackpool will overwhelmingly be for family housing sold on the open market.</p> <p>A revised economic strategy is being prepared to address these issues.</p>
CSH12	Simon Marley	16 Leyfield Close Blackpool FY3 7RQ	Support	Support	-	-
CSH13	Gerald Clark	Crystal Cottage Crystal Mews Crystal Road Blackpool FY1 6BS	Object	Object	Priority should be given to inner areas, i.e. Central Drive, South Shore etc.. These areas are in greater need of (re)development.	Regeneration of inner Blackpool is a key priority for the Council as set out in Revised Preferred Option Policy CS1: Strategic Location for Development. In addition, of the revised housing provision of 4500

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						new dwellings in Policy CS2 around 76% is brownfield development including other inner area regeneration sites.
CSH14	Angelia Hinds	21 Moss House Road Blackpool FY4 5JF	Object	Object	<p>Comment on paragraph 1.2 - As Planning Officers are aware, the leaflets for this event were delivered to very few homes and an explanation for this has never been given to the residents. Has an explanation for this ever been given to the council?</p> <p>Comment on paragraph 3.6 - How can development on Marton Moss, with the proposed first phase containing no affordable or social housing and the commuted sum being reduced</p>	<p>Extensive consultation was undertaken on the Council's website, at all libraries and various Council offices, in the Local Press and at the well attended Cherry Tree Area Forum to seek to ensure that everyone interested in the consultation was informed.</p> <p>The leaflet was one element of this wider consultation. It is acknowledged that the company employed to deliver the leaflets to the Moss Area at the Preferred Option consultation stage performed inadequately, and this has been explained to those who have raised this issue.</p> <p>It would appear that this comment relates to the Moss House Road. housing application and the associated commuted sum. This sum represents a substantial contribution towards prioritising affordable housing in the inner areas.</p>

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					<p>from £21+ million to £9 million, be considered to be in any way prioritising affordable housing in the inner areas?</p> <p>Comment on paragraph 4.4 - The provision of 444 dwellings p.a. only came into being with the adoption of the NWRSS in 2008, prior to this the Blackpool Plan figures for 2001-06 were 235 pa, and for 2006-16 were 280. The figures stated in Table 4 show that approximately 138 MORE dwellings than were required by the Blackpool Plan were provided in the period 2003-08.</p> <p>To allocate a figure of 444 to periods prior to the adoption</p>	<p>Affordable housing policy recognises that the feasibility and viability of affordable housing requirements ultimately met will depend on changing costs and conditions in the local housing market. The agreed initial sum of just under £9.2 million was the result of a detailed assessment, with flexibility to re-appraise and increase this at various stages to reflect sales price increases.</p> <p>The RSS requirement relates to the statutory period 2003-21. Once the RSS was adopted in September 2008, the requirement for the Blackpool Core Strategy was to provide the outstanding number of dwellings to meet the total requirement of 8,000 dwellings by 2021.</p> <p>The housing requirement has been reviewed in the Revised Preferred</p>

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					<p>of the RSS is a manipulation of the statistics.</p> <p>Comment on paragraph 4.13 - By allowing phases A and B to go ahead in the same timescales as defined in the previous version of the Core Strategy, will not reduce the scale or pace of new housing on the periphery of the town but may well reduce that of regeneration, due to lack of funds.</p> <p>Comment on paragraph 5.22 - If the proposed development at phase A is almost 600 homes on approximately 17 hectares of land and phase B will be approximately 900 homes just over double that size, how can these 2 estates be classed as 'small housing clusters'?</p>	<p>Option. The proposed new requirement is set out in Policy CS2 of the Revised Preferred Option</p> <p>The pace at which development comes forward in south Blackpool and in the inner areas will be determined by a range of factors including the strength of the housing market and by the availability of funding.</p> <p>The Revised Preferred Option no longer allocates 900 homes on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p>

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					<p>Comment on paragraph 5.27 - Nowhere in this document or any of the supporting documentation is the evidence base for these revised figures? On what are they based?</p> <p>If only the land occupied by phases A and B is to be built on, then the necessary 2 (or even 3) primary and 1 secondary school required by these developments will also have to be built on this land. This will greatly increase the density from that currently envisaged – which is already high.</p> <p>Why is there no mention in the document about the provision of schools and other</p>	<p>The housing requirement has been reviewed in the Revised preferred Option document. The reviewed figure has been informed by the Strategic Housing Market Assessment (2008), Housing Monitoring Report (2011), Fylde Coast Housing Strategy (2009), Housing Technical Paper (2012); Strategic Housing Land availability Assessment (2008); Strategic Housing Land annual Reviews (2008-2011); representations received to the consultations undertaken in 2010.</p> <p>Refer to previous comments on the remaining lands at the Moss regarding neighbourhood planning approach.</p> <p>Notwithstanding the fact that the Revised Preferred Option now proposes a neighbourhood planning</p>

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					<p>facilities?</p> <p>Comment on paragraph 5.29 - According to the response from Fylde Borough Council on the previous version of the Core Strategy, they have stated that they 'do not support the M55 Hub' nor 'at the time of writing, support the associated Joint SPD.' To only quote part of their response is disingenuous.</p> <p>Comment on paragraph 5.30</p> <p>There may be land available at the airport for economic development but there no evidence of firms committing to starting up businesses there. At the airport itself, there is even the possibilities of redundancies.</p> <p>Nowhere in the Core Strategy are there any proposals for</p>	<p>approach for the remaining lands of the Moss, the provision of educational facilities is covered by Policy CS14.</p> <p>The Revised Preferred Option no longer refers to the '<i>M55 Hub Growth Point</i>'.</p> <p>The Blackpool Employment Land Study forms part of the evidence base and shows that recent take-up of industrial/ business land in Blackpool has been substantially concentrated on lands close to the Airport.</p> <p>Whilst the visitor economy will continue to underpin Blackpool's</p>

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					<p>attracting employment to this area. This is surely 'core' to any 'strategy' that Blackpool has to improve prospects for the residents and the town itself.</p> <p>Comment on paragraph 5.36 - Although there was a great deal of support from the public for the extension of the green belt, more weight is being given to the views of the few who live in that area and the intention is that they will be allowed to do what all Moss residents have wished to do for many years – build</p>	<p>economy and remains a key growth are, it is recognised that there is the need to strengthen economic prosperity through supporting business growth and attract new investment to provide sustainable jobs in other employment sectors than leisure. Policy CS3: Economic Development and Employment identifies those areas which provide the opportunity for future economic growth as well as focusing on improving the skills of Blackpool residents to access the new jobs. Policy CS25 South Blackpool Employment Growth further expands on the opportunities in this area.</p> <p>Refer to previous comments on the remaining lands at the Moss regarding the proposed neighbourhood planning approach.</p>

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					<p>on their own land, as detailed in paragraph 5.43. Why is this?</p> <p>Comment on paragraph 5.42 - A much more logical recommendation would be either:</p> <ol style="list-style-type: none"> 1. build on lands between Common Edge and Midgeland in a linear fashion down to Division Lane. This would be much more sustainable as it would be closer to existing bus routes and other facilities. 2. Still build on phases A, B and C but at much lower densities. This would give 'small housing clusters' and provide the improved housing offer that they would like. 	<p>Refer to previous comments on the remaining lands at the Moss regarding the proposed neighbourhood planning approach to the area.</p>
CSH15	C Smith	372 Highfield Road Blackpool FY4 3JX	Support	Object	-	-
CSH16	Kate Grimshaw	Lancashire County Council	Support	Support	Lancashire County Council own two parcels of land to the east (within Fylde's boundary)	Comments noted.

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		Resources Directorate Property Group Rm F19, County Hall Preston PR1 8RE			of Areas A and B - the Marton Estate and the detached parcel associated with the Midgeland Estate - both these sites are available for housing development and could accommodate the type of development detailed in the Area B proposals. The Midgeland Estate falls within Area C however the proposals for this Area accord with Lancashire's aspirations and requirements for this site.	
CSH17	William Harrison	167 Warley Road Blackpool FY1 2RW	Object	Support	-	-
CSH18	Peter J Nuttall	Long Acre School Road Blackpool FY4 5EL	Object	Object	I would support Area C proposals if you had indicated that improvement to and removal of eyesores included building of, say one property per site to give some uniformity to the area. This would help reduce eyesores on land that is just running wild. There are a number of examples on School Road that	The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be

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					building would improve the look of the road and not destroy the openness.	acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
CSH19	Mr and Mrs Craggs	202 Common Edge Road Blackpool FY4 5DG	Support	Support	-	-
CSH20	Val Watt	356 Midgeland Road Blackpool FY4 5HZ	Object	Support	<p>Worried about:</p> <p>Water Table</p> <p>Will the roads cope when there are no plans for more roads?</p> <p>Jobs in area insufficient for such growth</p> <p>Finally, large parts of central Blackpool are crumbling, surely it would be better to redevelop those areas than lose more of the few green areas Blackpool has, especially</p>	<p>The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>Regeneration of inner Blackpool is a key priority for the Council. The Revised Preferred Option Core Strategy policy reflects this, with the vast majority of the opportunities for new homes identified focused on</p>

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					in an area prone to flooding.	brownfield and inner area regeneration sites.
CSH21	Mrs S Swann	350 Midgeland Road Blackpool FY4 5HZ	Object	Object	<p>I object to the building of houses on the Moss. We are short of green fields and extra buildings will cause mayhem to the drainage system causing flooding in many gardens.</p> <p>As I have said before, you make up your own minds and do as you wish so why ask?? It's about time you learnt to listen.</p>	The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
CSH22	Mrs P Whiteside	259 Midgeland Road Blackpool FY4 5JA	Object	Support	The Council should look at the condition of South Shore and Town Centre before building any more houses. The town is a dump. Also, landowners on the Moss should have to maintain their land to a reasonable standard and not let it get overgrown and weed infested.	<p>Regeneration of inner Blackpool is a key priority for the Council. The Revised Preferred Option Core Strategy policy reflects this, with the vast majority of the opportunities for new homes identified focused on brownfield and inner area regeneration sites.</p> <p>The Revised Preferred Option Core Strategy does not allocate any</p>

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						housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
CSH23	Mr and Mrs Fifer	6 Ecclesgate Road Blackpool FY4 5DW	Object	Object	I am all for tidying the Moss up but we need to keep the green, not more houses. Also, it's the volume of traffic this will create. Most people have 2/3 cars per household. It is already a nightmare on Common Edge Road between 8.30-9.30am and 5-6pm. We can't get out of our lane. I have horse and hacking is also difficult at these times.	The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.

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CSH24	John Jorgenson	4 Fishers Lane Blackpool FY4 5DN	Object	Support	-	-
CSH25	Andrew Adshead	23 Stockydale Road Blackpool FY4 5HP	Object	Support	<p>1) The land cannot sustain further properties during very modest rainfall. The land retains water for a lengthy period disproportionate to the rain precipitated.</p> <p>2) There are areas of Blackpool desperately in need of demolition and redevelopment. Why ruin what picturesque areas we have left?</p>	<p>1) The Revised Preferred Option does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p> <p>2) Regeneration of inner Blackpool and brownfield sites are key priorities for the Council. Revised Preferred Option Policy CS2 reflects this, with around 76% of the opportunities for 4,500 new homes identified development focused on brownfield sites, including inner area regeneration sites.</p>

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					<p>3) Why not redevelop large disused commercial sites such as the old MFI first?</p> <p>4) There will need to be massive support in financial terms for schools, sewage, roads, communication.</p> <p>5) Blackpool is already one of the most densely populated areas of the UK. Why are we making that worse? People can live in other areas. Building new houses will attract people to live here on top of all the rest of us.</p>	<p>3) This site has been granted planning permission for a fitness club.</p> <p>4) Refer to response under point 1)</p> <p>5) Refer to response under 1)</p>
CSH26	Mr David Wells	338 Midgeland Road Blackpool FY4 5HZ	Support	Support	<p>I live in Area C and support the proposal to safeguard the area.</p> <p>I also support the development of Area A and B but with the proviso that shops as well as houses are planned for this area. At present there is no shop within 1.5 miles of my house.</p>	The Revised Preferred Option Core Strategy policy does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances

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						where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
CSH27	T Forsyth	Homestead Division Lane Blackpool FY4 5DZ	Support	Object	-	-
CSH28	Kate Rooney	12 Hardwicke Road Narborough Leicester LE19 3LW	Support	Support	I support the proposal about the land South of Progress Way and believe that there should be some flexibility regarding developing the land. The proposals should allow further potential for development in this area and allow small scale development and infill dwellings in areas which are already quite well developed, such as School Road, or land which previously had a building which has been demolished or destroyed due to arson. Some of this land is fallow land and does little to enhance the environment whereas infill development	The Revised Preferred Option Core Strategy does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.

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					<p>may create a more attractive appearance. Fields of weeds, which are evident on this fallow land, are not attractive and do not reflect the character of Marton Moss. This fallow land could attract travellers who could commandeer it, and erect their own dwellings without planning permission. This could cause conflict with existing inhabitants and environmental damage and would not help to maintain the character of the Moss.</p> <p>Small scale developments of Executive housing would attract business people to Blackpool and the land South of Progress Way has immediate links with the motorway which would facilitate commuting to Preston, Lancaster or Manchester.</p> <p>More flexibility and the potential for infill development would make</p>	

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					<p>Marion Moss a desirable place to live and attract business people to Blackpool.</p>	
CSH29	Mr and Mrs Baron	20 Stockydale Road Blackpool FY4 5HW	Object	Support	<p>We firmly believe that concentration should be on the redevelopment of 'brownfield' and town centre 'worn out' sites e.g. the many B&Bs and old properties no longer commercial viable. Blackpool- like many other seaside resorts needs far less holiday accommodation and should be building better quality housing and conference centres. As and when it becomes necessary to use 'green-field' areas then Whyndyke area is seen as more appropriate.</p>	<p>Regeneration of inner Blackpool and brownfield sites are key priorities for the Council. Revised Preferred Option Policy CS2 reflects this, with around 76% of the opportunities for 4,500 new homes identified development focused on brownfield sites, including inner area regeneration sites. There is also a focus on uplifting quality and decreasing the quantum of holiday accommodation, in conjunction with providing a better mix of new housing.</p> <p>The majority of land at Whyndyke Farm is in Fylde. The main part of the lands within Blackpool has been granted outline permission for a new hospital. And identified for around 150 dwellings south of Mythop Road. Whyndyke in Policy CS26 of the Revised Preferred option.</p>
CSH30	Mr and Mrs N K Smith	Lea Bank Chapel Road Blackpool	Support	Support	<p>Chapel Road has long since lost its countryside feel. Juggernauts are cutting</p>	<p>The Revised Preferred Option Core Strategy does not allocate any housing on the remaining lands at</p>

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		FY4 5HU			<p>through from the motorway as well as a heavy volume of traffic.</p> <p>The road is very dangerous due to lack of footpaths. It is constantly breaking up due to bad drainage and freezes in the winter. The whole area is neither countryside, residential or industrial. A decision needs to be made on its future.</p>	the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
CSH31	Mrs J McRory	Sunnybank School Road Blackpool FY4 5EN	Support	Support	I hope Dockypool Lane is going to be included in the plan as it is nothing but a dog toilet.	The Revised Preferred Option Core Strategy does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
CSH32	Mr and Mrs	548	Object	Support	To build more houses you	The Revised Preferred Option Core

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	Singleton	Midgeland Road Blackpool FY4 5ED			<p>need extra drainage and I haven't seen or heard of any plan to upgrade it. We have plenty of houses in Blackpool, why not make use of them?</p> <p>Get rid of the rif raf.</p>	<p>Strategy does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p>
CSH33	Mr and Mrs D Clayton	Netherside 393 Midgeland Road Blackpool FY4 5ED	Object	Object	<p>We object to the proposed building of all these houses. It's taking away the countryside and wildlife. There are plenty of places e.g. Central Drive and Bond Street area that could do with demolishing and building new houses.</p>	<p>The Revised Preferred Option Core Strategy does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p>

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CSH34	The Owner	Dalewood Worthington Road Blackpool FY4 5EH	Support	Support	<p>Do more slum clearance in town centre for house flat rebuilding.</p> <p>Demolish warehouses for house building at Sandersons Way and Vicarage Lane (ex DIY and car park)</p>	<p>Regeneration of inner Blackpool and brownfield sites are key priorities for the Council. Revised Preferred Option Policy CS2 reflects this, with around 76% of the opportunities for 4,500 new homes identified development focused on brownfield sites, including inner area regeneration sites.</p> <p>There is also a focus on uplifting quality and decreasing the quantum of holiday accommodation, in conjunction with providing a better mix of new housing.</p> <p>This property has received planning permission for a fitness centre.</p>
CSH35	Peter G Duckworth	The Mallards Sandy Lane Blackpool FY4 5EQ	Support	Object	<p>Much of the land in Area B is tatty, ill kempt or used in a hotch potch way. It is also sensible to keep a buffer zone to the south of Progress Way as this road forms a barrier to development.</p>	<p>The Revised Preferred Option Core Strategy does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances</p>

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					Thought should be given to updating the unmade roads in Area C - they are not appropriate in 2010.	where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option. If roads are unadopted then this is a private matter between all responsible parties.
CSH36	Ronnie Magarry	6 New Hall Avenue North Blackpool FY4 5GY	Object	Support	-	-
CSH37	P M Balshaw	The Poplars Kitty Lane Blackpool FY4 5EG	Object	Support	-	-
CSH38	Mr Alan Sykes	64 Stockydale Road Blackpool FY4 5HR	Object	Support	There is little enough countryside within Blackpool and the Moss deserves preserving. Once countryside is gone it's gone forever. There is enough derelict land and property in the Blackpool area for new housing without ruining the countryside.	The Revised Preferred Option Core Strategy does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is

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						reflected in Policy CS27 of the Revised Preferred Option.
CSH39	Jean Hassall	Dunno Cottage School Road Blackpool FY4 5EN	Support	Support	New houses are needed and should be built in open spaces within town boundaries. There are many open and unused areas in Area A and Area B most of which are eyesores and not open for public use. 'Mixed' housing needs to be built. At last some sense to be shown with regards to Area C which has been blighted for many years by over restrictive planning regulations. Don't let the NIMBYs hold proposals back.	The Revised Preferred Option Core Strategy does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
CSH40	Mr Vernon Lund	4 New Hall Avenue Blackpool FY4 5GY	Object	Support	I strongly object to houses being built on Moss House Road.	Outline planning permission has already been granted for 584 new dwellings.
CSH41	David and Anne Frith	Runnell Cottage Chapel Road Blackpool FY4 5HS	Support	Support	Support development in Area B as long as it is in keeping with the traditional informal character of the Moss and includes open spaces and landscaping within the plans.	The Revised Preferred Option Core Strategy does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop

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						neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
CSH42	Mr and Mrs G James	Fern Lea Sandy Lane Blackpool FY4 5EQ	Support	Support	-	-
CSH43	Mr and Mrs Shevloff	Rose Cottage Chapel Road Blackpool FY4 5HX	Object	N/A	-	-
CSH44	Mr A Hargreaves	Burnlea Nurseries Laundry Road Blackpool FY4 5JH	Support	Support	-	-
CSH45	John Ashworth	Runnell Farm Chapel Road Blackpool FY4 5HS	Support	Support	There are a great many good things happening to Blackpool at present, most recently the staging of Strictly Come Dancing and Prince William's stag weekend visit has all contributed to enhance the	Comments noted.

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					<p>persona of our town.</p> <p>To also provide an area to build beautiful new homes to address the imbalance mix in a variety of houses in our town is now our aim.</p>	
CSH46	Mr and Mrs William Paton	282 Common Edge Road Blackpool FY4 5DH	Object	Object	It is sad to see Marton Moss (our green belt) gradually disappearing for the building of residential buildings. I feel the volume of traffic which would undoubtedly follow would have a detrimental affect around the area. It would put such pressure on the schools and doctors surgeries in the area also.	The Revised Preferred Option Core Strategy does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
CSH47	Carole Banks	Acre Mead Chapel Road Blackpool FY4 5HX	Support	Support	I think these proposals are a good idea because it will bring jobs and much needed new homes to the Fylde area.	Comment noted.
CSH48	J Sloane	Newfields Dickies Lane Blackpool	Support	Support	Any improvements to roads and drains must be good as the area is in such a poor	The Revised Preferred Option Core Strategy does not allocate any housing on the remaining lands at

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		FY4 5LG			state.	the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
CSH49	Jack Varley	Crossfields New Hall Avenue Blackpool FY4 5HY	Object	Object	I think instead of putting 900 houses on Area B, spread them more evenly between B and C.	The Revised Preferred Option Core Strategy does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
CSH50	Jennifer	Gleneagle	Object	Support	Having read through the Core	Regeneration of inner Blackpool is a

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	Mason	1 School Road Blackpool FY4 5DS			Strategy document, I still don't think enough is being done to regenerate inner Blackpool and create better housing, leisure and job opportunities there.	<p>key priority for the Council. The Revised Preferred Option Core Strategy policy reflects this, with around 76% of the opportunities for new homes identified focused on brownfield and inner area regeneration sites.</p> <p>Revised Preferred Option Policy CS3 sets out the Council's strategic priorities for economic development and employment. Much of the focus of the resort regeneration and town centre policies in the Revised Preferred Option will strengthen employment opportunities. Whilst the visitor economy will continue to underpin Blackpool's economy and remains a key growth are, it is recognised that there is the need to strengthen economic prosperity through supporting business growth and attract new investment to provide sustainable jobs in other employment sectors than leisure. Policy CS3: Economic Development and Employment identifies those areas which provide the opportunity for future economic growth as well as focusing on improving the skills of Blackpool residents to access the</p>

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						new jobs. Policy CS25 South Blackpool Employment Growth further expands on the opportunities in this area.
CSH51	Mrs G Boardman	Sunny Dene St Nicholas Road Blackpool FY4 5JB	Object	Support	-	-
CSH52	Julie Edwards	190 Midgeland Road Blackpool FY4 5HH	Object	Object	A few objections: Flooding (our area does presently) Green belt Road safety Schooling Why develop on a 'moss'?	The Revised Preferred Option Core Strategy does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
CSH53	Mr and Mrs Barbour	Moss Dene St Nicholas Road Blackpool	Object	Object	-	-

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		FY4 5JB				
CSH54	Harry Howe	Pleasant View Sandy Lane Blackpool FY4 5EQ	Object	Support	I totally agree with relaxing the policy towards extensions etc. It is not before time. There seems to be rule for one and not for another especially when they are consistent and remaining with rural character. I totally agree with removing eye sores and maintaining open aspects and landscaping. Should be able to infill build?	A neighbourhood planning approach is now being promoted in the Revised Preferred Option of the Core Strategy for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
CSH55	Tim Greenwood	50 Stockydale Road Blackpool FY4 5HR	Object	Support	1) Given the continuing decline in Blackpool's population and the large number of empty properties in the town it is questionable new houses are required. 2) If new houses are required then the regeneration of central Blackpool should be the priority. The possibility of greenfield development should be denied until all brownfield sites and opportunities have been exhausted.	Regeneration of inner Blackpool and brownfield sites are key priorities for the Council. Core Strategy Policy CS2 of the Revised Preferred option Core Strategy reflects this, with around 76% of opportunities for new homes identified focused on brownfield sites, including inner area regeneration sites. In order to assist in re-balancing the housing market some development in South Blackpool is proposed which is focused on land at Moss House Rd. (around 600 new homes) and Mythop Road (around 150 new homes) (Policy CS26 of the Revised

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					3) The existing infrastructure is incapable of supporting substantial additional housing and would require upgrading before large scale development, irrevocably ruining the last remaining area of countryside within Blackpool.	Preferred Option). The Revised Preferred Option Core Strategy does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
CSH56	Mr J A Clayton	62 Stockydale Road Blackpool FY4 5HR	Object	N/A	Instead of building on greenbelt, think about rebuilding eyesores like Central Drive areas and North Shore Town Centre or is the deal already done. Money talks not peoples opinions.	Regeneration of inner Blackpool and brownfield sites are key priorities for the Council. Core Strategy Policy CS2 of the Revised Preferred Option Core Strategy reflects this, with around 76% of opportunities for new homes identified focused on brownfield sites, including inner area regeneration sites. The Revised Preferred Option Core Strategy does not allocate any housing on the remaining lands at the Moss. A

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						neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
CSH57	Unknown	Common Edge Road Blackpool	Support	Support	-	-
CSH58	David Challinor	8 Glencross Place Blackpool FY4 5AD	Object	Object	<p>The Borough of Blackpool has few green spaces. Why concrete over the natural environment when there are plenty of areas in central Blackpool desperately in need of regeneration.</p> <p>Where are the people to buy these new houses? Where is the work for them? Where are the mortgages for them? (Banks aren't lending)</p>	<p>Regeneration of inner Blackpool and brownfield sites are key priorities for the Council. Core Strategy Policy CS2 of the Revised Preferred Option Core Strategy reflects this, with around 76% of the opportunities for new homes identified focused on brownfield sites, and other inner area regeneration sites.</p> <p>Despite the current housing market downturn and affordability problems, there remains a national and local identified shortage of new</p>

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					The housing market is faltering as it is. Extra homes aren't needed and certainly not on green belt land.	housing, with the Plan seeking to meet longer term needs to 2027. In order to assist in re-balancing the housing market some development in South Blackpool is proposed in the Revised Preferred Option which is focused on land at Moss House Rd. (around 600 new homes) and Mythop Road. (around 150 new homes) (Policy CS26 of the Revised Preferred Option). The Revised Preferred Option Core Strategy does not allocate any housing on the remaining lands at the Moss. A neighbourhood planning approach is now being promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.
CSH59	J Taylor	Larkfield St Nicholas Road Blackpool	Object	Object	-	-

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		FY4 5JB				
CSH60	Joseph S Meeke	Langtree Jubilee Lane Blackpool FY4 5EP	Object	Support	I feel that too much emphasis is placed on granting planning permissions on green land instead of redeveloping the eyesore areas in the town	Regeneration of inner Blackpool and brownfield sites are key priorities for the Council. Core Strategy Policy CS2 of the Revised Preferred Option Core Strategy reflects this, with around 76% of the opportunities for new homes identified focused on brownfield sites, and other inner area regeneration sites.
CSH61	Graham Baker	Glende St Nicholas Road Blackpool FY4 5JB	Support	Object	-	-
CSH62	Mr Chabba	Madhuban Cropper Road North Blackpool FY4 5LF	Support	Support	This plan should be brought forward and must build nice houses with gardens on both sides.	A neighbourhood planning approach is now being promoted for the remaining lands at Marton Moss in the Revised Preferred Option Core Strategy to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development, including residential may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option. The allocation for 900 dwellings

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						north of Progress Way has been removed from the revised policy.
CSH63	Mrs P Maddock	The Hollies Chapel Road Blackpool FY4 5HL	Support	Support	Since this area of the Moss has changed considerably over the years with the development of major link roads and outlying industrial estates, it no longer feels that it is appropriate to ask residents to remain isolated from main services such as gas supplies and main sewage. Therefore, there seems no point in pretending that this land is a rural part of Blackpool.	A neighbourhood planning approach is now being promoted for the remaining lands at Marton Moss in the Revised Preferred Option Core Strategy to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development, including residential may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option. The allocation for 900 dwellings north of Progress Way has been removed from the revised policy.
CSH64	Mr J T Maddock	Dean Nurseries Chapel Road Blackpool FY4 5HU	Support	Support	I have lived here for over thirty years and seen the Moss deteriorate from a rural haven into an uncontrolled development of low investment industrial waste land. Development in this area in line with the general proposals at the M55 hub will be welcome and will lead to a	A neighbourhood planning approach is now being promoted for the remaining lands at Marton Moss in the Revised Preferred Option Core Strategy to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development, including

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					vast improvement in the quality of life in this area. However, reasonable land values must remain to the existing land owners throughout the transfer of land ownership.	residential may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option. The allocation for 900 dwellings north of Progress Way has been removed from the revised policy.
CSH65	Natural England	Hornbeame House Crewe Business Park Electra Way Crewe CW1 6GJ	N/A	N/A	<p>Refer to their previous letter dated 16 July 2010 regarding the Core Strategy, as the comments made in that letter remain valid.</p> <p>Natural England considers that the strategies, policies and proposals in development plans are of considerable importance to the natural environment. Blackpool is a particularly intense urban form and has a deficit of open space with exception to the Promenade and beach; and land to the eastern borough boundary.</p> <p>Sites of nature conservation importance can be affected by development in Blackpool. Marton Mere is the only SSSI in the borough; and although</p>	<p>The Council's wider response to Natural England is set out in the Council's report on the wider consultation on the Core Strategy.</p> <p>Comments noted.</p> <p>A Phase 1 Habitats Survey was carried out by Bowland Ecology, which highlights the existence of Great Crested Newts and Water Voles in the wider area.</p>

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					<p>outside Blackpool we would welcome consideration of sites close by including Ribble Estuary SSSI, Ribble and Alt Estuaries SPA and Ramsar site and Lytham Dunes SSSI. These sites could still be affected by development in Blackpool and it is important to be aware of them and give them due consideration.</p> <p>We also draw your attention to protected species. In particular, with the extensive ponds and ditches network there are known populations of great crested newt and water vole. Biodiversity does exist in urban areas too.</p>	<p>Policy CS6: Green Infrastructure has been amended to reflect the recommendations of Bowland Ecology with respect to the Phase 1 Habitats Regulations Assessment to ensure consideration is given to the impact of development on the international sites. In addition the revised policy also seeks to preserve, restore and enhance national and local sites of biological and geological conservation importance.</p> <p>In addition, a neighbourhood planning approach is now being promoted for the remaining lands at Marton Moss in the Revised Preferred Option Core Strategy to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development, including residential may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option. The supporting text to the policy makes specific reference to Annex 1 listed bird species that visit Natura</p>

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						2000 sites and that a detailed biodiversity strategy for the Moss should be implemented where required. The allocation for 900 dwellings north of Progress Way has been removed from the revised policy.
CSH66	Theatres Trust	22 Charing Cross Road London WC2H 0QL	N/A	N/A	Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and as this consultation is not directly relevant to the Trust's work, we have no comment to make but look forward to being consulted on further LDF documents especially the next stage of the Core Strategy, Development Control Policies, Planning Obligations and any town centre Area Action Plans.	Comment noted.
CSH67	Miss J Reilly	4 Laundry Road Blackpool FY4 5JH	N/A	N/A	I am a Marton Moss resident, bought my house here in 96 and love living here due to the character and rural feel of the area.	A neighbourhood planning approach is now being promoted for the remaining lands at Marton Moss in the Revised Preferred Option Core Strategy to develop neighbourhood policy which supports the retention

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					<p>I am all for progress, was born in Blackpool and have lived on the Fylde for 35 of my 36 years! So feel I have a right to comment... especially as I reside on the Moss.</p> <p>If it was my choice, and selfish choice I guess, I would say please please don't build anywhere on the Moss!</p> <p>It is the only remaining green area on the Fylde, it's the reason why so many love this area and it has so much history, it needs to preserved.</p> <p>BUT..... I'm not so ignorant to think that the housing shortage in Blackpool can be put right, without building on empty spaces.....</p> <p>However, please try and preserve our lovely Moss, in whatever building work that is to take place.</p> <p>KEEP THE GREEN GREEN!!!!</p>	<p>and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development, including residential may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option. The allocation for 900 dwellings north of Progress Way has been removed from the revised policy.</p>
CSH68	Environment	Environment	N/A	N/A	Before the publication of the	A neighbourhood planning approach

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	Agency	Agency Lutra House PO Box 519 South Preston, Lancashire PR5 8GD.			Core Strategy we would expect to see how the findings of the Surface Water Management Plan are incorporated into the Core Strategy. Although we accept that reduced housing numbers could have a beneficial impact on surface water, it is unclear at present how the drainage system will cope with any extra houses. We would be happy to discuss with you the best way to achieve this.	is now being promoted for the remaining lands at Marton Moss in the Revised Preferred Option Core Strategy to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development, including residential may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option. The allocation for 900 dwellings north of Progress Way has been removed from the revised policy.
CSH69	The Coal Authority	200 Lichfield Lane Berry Hill Mansfield Nottinghamshire NG18 4RG	N/A	N/A	Confirm that we have no specific comments to make on this document at this stage.	Noted.
CSH70	Mr and Mrs Knott	23 Moss House Road Blackpool FY4 5JF	N/A	N/A	Now that the wildly unrealistic plans for the M55 hub are being replaced by the Blackpool South Development Plan we had hoped for ideas to improve the quality of life of the long-suffering	A neighbourhood planning approach is now being promoted for the remaining lands at Marton Moss in the Revised Preferred Option Core Strategy to develop neighbourhood policy which supports the retention and enhancement of the distinctive

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					<p>permanent residents. This area needs imaginative planning, to preserve its heritage and provide benefits to the whole community, but so far this has not been forthcoming. Lands to the South of Progress Way :- This is a not a Plan. i.e. Leave it as it is and decrease restrictions, in spite of the majority wanting some green belt protection.</p> <p>Lands to the North of Progress Way Will these proposals:-</p> <ol style="list-style-type: none"> 1) Increase the woefully inadequate green space available - NO (Building a housing estate at Moss House Road will considerably decrease it.) 2) Provide more opportunities for new and existing small business's - NO (It removes some of them.) 3) Protect wildlife - NO (The provision for wildlife is on private land and therefore has no protection) 	<p>character of the Moss whilst identifying those circumstances where development, including residential may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option. It will provide the community with the opportunity to directly determine the future of the area improving the interest and value of the Moss lands. The policy does not allocate any housing development unless this emerges through the neighbourhood planning process from the community in which case it will be set out in a Neighbourhood Plan or Site Allocations Development Plan Document.</p>

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					<p>4) Protect a “ NATIONAL ASSET “ (DEFRA) ref. Moss House Rd. site - NO (Not a “natural asset”. If you wish to quote a statutory body please ensure it is correct.)</p> <p>5) Provide money for urgent inner town regeneration - NO (It could be many years before this is forthcoming.)</p> <p>6) Facilitate traffic flows safely in and out of Blackpool and the surrounding area - NO (Another set of traffic lights on Progress Way is likely to lead to avoidance, making estimates of vehicles likely to use the narrow roads in the vicinity unreliable. The consideration of a weight restriction for vehicles using School Road indicates the potential for further problems.)</p>	<p>This comment seems to relate to the Moss House Road planning application, which is not a matter for the Core Strategy.</p> <p>Monies from affordable housing commuted sums, and potentially from the New Homes bonus will support inner area regeneration schemes.</p> <p>Refer to previous comment regarding a neighbourhood planning approach.</p>

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					<p>7) Improve educational/recreational facilities - NO (No provision for additional secondary and primary school places, sport or leisure facilities.)</p> <p>8) Improve the physical/ mental health and life expectancy of all the residents - NO (A missed opportunity to really try to make a difference.)</p> <p>9) Improve the quality of life for residents in immediate area - NO (More urban sprawl with increased noise and pollution.)</p> <p>10) Include a much- needed integrated drainage improvement and maintenance plan taking into consideration the whole area - NO (The phasing policy is ignoring the possibility of immediate problems)</p> <p>11) Provide proper targeted information on public</p>	<p>Refer to previous comment regarding a neighbourhood planning approach.</p> <p>Refer to previous comment regarding a neighbourhood planning approach.</p> <p>Refer to previous comment regarding a neighbourhood planning approach.</p> <p>Refer to previous comment regarding a neighbourhood planning approach.</p> <p>Extensive consultation was undertaken on the Council's website,</p>

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					<p>consultations - NO (Leaflets were not delivered informing us of local consultations. No explanations or apologies for this have been received by the residents)</p> <p>12) Whilst Blackpool is in the headlines for youth violence, drug related crime, poor life expectancy, teenage mothers who smoke, low wages and associated social problems, people will use the town only for entertainment and short visits. The permanent working population is more likely to look outside the borough to</p>	<p>at all libraries and various Council offices, in the Local Press and at the well attended Cherry Tree Area Forum to seek to ensure that everyone interested in the consultation was informed. The leaflet was one element of this wider consultation. A further consultation letter directly concerning the Moss in November went to all who had previously responded, and to all residents across the Moss. It is acknowledged that the company employed to deliver the leaflets to the Moss Area at the Preferred Option consultation stage performed inadequately, and this has been explained to those who have raised this issue.</p> <p>Blackpool has a range of problems in its inner areas and generally across the town which the Revised Preferred Option Core Strategy seeks to address through a balanced approach to deliver town centre, resort and inner neighbourhood regeneration and supporting development.</p>

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					live. There may be a strong argument for better quality housing, but it begs the question: would you want to buy a house here?	
CSH71	Highways Agency	Network Delivery & Development Piccadilly Gate Store Street Manchester M1 2WD	N/A	N/A	<p>The Strategic Road Network around Blackpool</p> <p>Whilst there is no part of the Strategic Road Network (SRN) within Blackpool, there are aspects of the network to the east of the district. To the east of the borough lies the M55 and the A585(T).</p> <p>1. The M55 which provides a link between the M6 north of Preston; and</p> <p>2. The A585(T) links Fleetwood in the north to the M55.</p> <p>The M55 and A585(T) are categorised as being of a regional rather than national nature. In having this regional role, it should be recognised that whilst the Agency still has</p>	Comments noted.

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					<p>the responsibility for the operation of these routes, the funding for improvements to such routes would need to be considered by the Regional Transport Board and provided through the Regional Funding Allocations.</p> <p>The Need for New Homes to 2026</p> <p>The Agency is generally supportive of the proposed amendments set out in the consultation document and appreciates that the information set out in the report aims to reflect the end of regional housing targets, recent housing trends and the latest market assessment to determine the current need for new housing development. As identified in the report, the proposed housing figures represent an overall reduction in allocated housing development and that this is likely to be delivered at a reduced rate. Whilst the</p>	Comments noted.

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					<p>Agency has no significant concerns regarding this approach we would expect these revisions to housing and delivery to be reflected in other supporting documents, such as the Allocations DPD and particularly in an Infrastructure Development Plan (IDP).</p> <p>With specific regard to the development proposed at Marton Moss, the Agency submitted concerns in its response to the Core Strategy Preferred Option draft that the scale of development at the M55 Hub would have a detrimental impact on the operation of the SRN due to its proximity to the M55. The Agency is therefore generally supportive of the reduction in the scale of housing proposed at Marton Moss, but would like to reiterate the need to ensure that any measures required to reduce the impact on traffic movements, such as new or improved sustainable</p>	<p>Comments noted. The Highways Agency will be consulted throughout the Core Strategy process and subsequent Development Plan Documents.</p> <p>A neighbourhood planning approach is now being promoted for the remaining lands at Marton Moss in the Revised Preferred Option Core Strategy to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development, including residential may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option. The allocation for 900 dwellings north of Progress Way has been removed from the revised policy.</p>

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					<p>transport provision or infrastructure, are fully integrated, linked to the proposed development and ultimately can be delivered. The Agency would also request that they continue to be consulted regarding these issues, to ensure that together we are able to effectively determine the potential impact on the M55 of development in this location. Further, whilst it is recognised that the M55 Growth Hub will be determined by Fylde Borough Council, the Agency would expect the two councils to continue to work closely together regarding the cross boundary issues, particularly with regard to considering the potential traffic generation and impact.</p> <p>Further, with specific regard to the development proposed at Whyndyke Farm, the Agency also previously expressed concerns regarding the proposal in its previous</p>	<p>Comment noted.</p>

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					<p>response and notes that it is proposed to remove the site as an allocation, from the Core Strategy, given that the new hospital has now received outline approval. The Agency has no significant concerns with this approach provided that development at Whyndyke Farm continues to be taken into consideration when assessing the cumulative transport impact with the remaining proposals at Marton Moss.</p> <p>The Agency previously identified a lack of supporting evidence, particularly in the form of traffic modelling, to support the proposed M55 Hub proposal. The Agency are still waiting to receive this evidence and would request that this is provided prior to or at the latest, during consultation on the Core Strategy Publication draft, if the Council wishes to gain the full support of the Agency. This information is critical to</p>	<p>Refer to previous response regarding the neighbourhood planning approach to the remaining lands at Marton Moss.</p>

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					<p>ensure that the proposed development can be sustainable delivered without detrimentally impacting on the safety and efficient operation of the M55.</p> <p>Finally, as stated above, it is noted that a key influence on the decision to revise the scale of housing growth for the Core Strategy was the revocation of the North West Regional Spatial Strategy (the RSS) and its housing targets. However since the publication of this report, a successful High Court challenge against the decision made by the Secretary of State for Communities and Local Government, the Rt Hon Eric Pickles, to revoke all Regional Strategies, has led to the reinstatement of Regional Strategies and their housing targets. However, it remains Government intention to abolish regional plans and this will be reflected in the forthcoming Localism Bill.</p>	<p>Comment noted.</p>

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					Following communications with Planning Officers at Blackpool Council, on 17th November 2010, to clarify the Council's position in light of the reinstatement of Regional Strategies, it was confirmed that the revisions proposed by this report are still to be sought. The Agency is acceptant of this stance and maintains its general support for the proposed amendments.	
CSH72	Lancashire County Council - Archaeology	PO Box 9 Guild House Cross Street Preston Lancashire PR1 8RD	N/A	N/A	<p>Thank you for consulting on the above changes to the preferred options for housing in Blackpool. The changes include the allocation of two areas of housing at Marton Moss (north of Progress Way), one of which already has extant planning permission, and the removal of a third area south of Progress Way from the allocations.</p> <p>We would have no objections to these changes, but would note that these three areas do retain heritage assets and</p>	A neighbourhood planning approach is now being promoted for the remaining lands at Marton Moss in the Revised Preferred Option Core Strategy to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development, including residential may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option. The allocation for 900 dwellings north of Progress Way has been removed from the revised policy.

ID	Name	Address	Do you support or object to the proposals for: - Area B: Lands between Yeadon Way and Progress Way, east of Midgeland Road	Do you support or object to the proposals for: - Area C: South of Progress Way	Further comments	Council Response
					<p>have the potential for further as-yet unrecorded remains to exist. As set out in Planning Policy Statement 5 a Heritage Statement, including formal investigations and an archaeological response would be required for any development proposals within those areas, but it does not appear that this would prevent development occurring. It would be useful if the policy statement made reference to the need for a Heritage Statement as part of any planning application.</p> <p>As a guide to the level of information required in a Heritage Statement for large-scale development on one of these sites, as well as a summary of potential and investigations required, the Environmental Statement accompanying planning application 4/09/00740 for land north of Progress Way and west of Midgeland Road contains an appropriate</p>	

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					archaeological section. The archaeological response to smaller development proposals, including proposals for the conversion, extension or replacement of individual buildings in the area to the south of Progress Way, would need to be proportionate to the proposals and consider only those aspects which were relevant.	
CSH73	Lancashire County Council - Ecology	PO Box 9 Guild House Cross Street Preston Lancashire PR1 8RD	N/A	N/A	<p>Within the document the Summary of Consultation Responses, para 1.8 summarises main concerns raised, one such concern being:</p> <p>The need to protect the biodiversity of the Moss, and to involve wider partners in preparing a biodiversity strategy as part of the phased implementation of any development.</p> <p>Further, in the Appendix, under the heading Lands at Marton Moss: Blackpool Core Strategy Preferred Option, it is</p>	A neighbourhood planning approach is now being promoted for the remaining lands at Marton Moss in the Revised Preferred Option Core Strategy to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development, including residential may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option. The allocation for 900 dwellings north of Progress Way has been removed from the revised policy. The supporting text to Policy CS27 acknowledges the importance of biodiversity and the measures

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					<p>stated;</p> <p>The commissioning of Bowland Ecology to undertake a Phase 1 Habitats Survey identifying species or habitats of importance and the measures required to protect or enhance them.</p> <p>However, these do not appear to be integrated within the document.</p> <p>In the context of Ecology and Biodiversity the following elements of Planning Policy 9 Biodiversity and Geological Conservation needs to be embraced.</p> <p>5. Local development frameworks should:</p> <p>(i) indicate the location of designated sites of importance for biodiversity and geodiversity, making clear distinctions between the</p>	<p>required if any development is proposed through the neighbourhood planning process.</p> <p>The Revised Preferred Option Core Strategy has been subject to a Phase 1 Habitats Regulation Assessment (May 2012) and the recommendations have been taken on board through amendments to Policy CS6 Green Infrastructure which provides the strategic policy basis for increased natural landscaping and sustaining and enhancing biodiversity. The policy is compliant with the National Planning Policy Framework (March 2012).</p> <p>The Proposals Map and saved policies of the Blackpool Local Plan (2006) further identify and safeguard the designated sites of importance.</p>

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					<p>hierarchy of international, national, regional and locally designated sites; and</p> <p>(ii) identify any areas or sites for the restoration or creation of new priority habitats which contribute to regional targets, and support this restoration or creation through appropriate policies.</p> <p>12. Networks of natural habitats provide a valuable resource. They can link sites of biodiversity importance and provide routes or stepping stones for the migration, dispersal and genetic exchange of species in the wider environment. Local authorities should aim to maintain networks by avoiding or repairing the fragmentation and isolation of natural habitats through policies in plans. Such networks should be protected from development, and, where possible, strengthened by or integrated within it. This may</p>	<p>This aspect is covered by the revised Policy CS6: Green Infrastructure.</p>

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					<p>be done as part of a wider strategy for the protection and extension of open space and access routes such as canals and rivers, including those within urban areas.</p> <p>The document does not present any indication how it is intended to deliver these requirements through the DPD.</p> <p>The question is therefore raised over whether the document is consistent with National Policy.</p>	
CSH74	Lancashire County Council - Planning	PO Box 100 County Hall Preston PR1 0LD	N/A	N/A	<p>The document significantly revises the Blackpool Council Preferred Core Strategy. Most notably the development on the Fylde boundary has been amended. In the Marton Moss area reduction of 1200 dwellings is proposed by the re-allocation of area M2(c) to open countryside. The development of this area was part of the wider 'M55 Hub Growth Point' which extended across the boundary with</p>	<p>The Revised Preferred Option of the Core Strategy focuses development within the Blackpool Boundary in South Blackpool, instead of a focus on the M55 Hub Growth Point. In addition a neighbourhood planning approach is now being promoted for the remaining lands at Marton Moss in the Revised Preferred Option Core Strategy to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances</p>

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					<p>Fylde Borough Council. It is clear that Fylde Borough Council do not wish to support this approach and referenced to the 'M55 Hub Growth Point' have been replaced by the 'South Blackpool Sustainable Growth' in the paper. Although it is not stated explicitly, it appears that this element (M55 Hub Growth Point) of the Preferred Core Strategy is no longer being pursued. The document should therefore provide clarification on the status of the Growth Point proposal.</p> <p>Development at Marton Moss was put forward, and assessed within supporting documentation, on the basis that it was part of a broader strategic proposal which has the critical mass to create a viable and sustainable community containing a district centre, schools, transport and other infrastructure. According to the M55 Hub Masterplan,</p>	<p>where development, including residential may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option. The allocation for 900 dwellings north of Progress Way has been removed from the revised policy.</p>

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					<p>much of the proposed infrastructure was located within the Fylde District. Development at Marton Moss should therefore be reassessed to determine whether, as an urban extension, it is a sustainable location. The proposal should therefore be subject of a revised Sustainability Appraisal.</p> <p>My original comments raised the issue of infrastructure and the need for an assessment in line with the requirements of PPS12 in relation to the M55 Hub Growth Point. Comments from other respondents to the Preferred Core Strategy also indicate a need for further consideration of infrastructure provision. There is no reference to an assessment of infrastructure within the paper or any evidence on the website. The Core Strategy as a whole should be supported by an assessment of infrastructure, but the</p>	<p>The Revised Preferred Option Core Strategy has been subject to a Sustainability Appraisal May 2012 which will be published alongside the Revised Preferred Option Core Strategy.</p> <p>Refer to previous comments regarding South Blackpool and the neighbourhood planning process. The Infrastructure and Delivery Plan being prepared and has informed the Revised Preferred Option of the Core Strategy will be finalised for the Pre Submission stage.</p>

ID	Name	Address	Do you support or object to the proposals for: - Area B: Lands between Yeadon Way and Progress Way, east of Midgeland Road	Do you support or object to the proposals for: - Area C: South of Progress Way	Further comments	Council Response
					<p>proposed urban extension at Marton Moss in particular needs to be supported by an infrastructure delivery plan. Given its close proximity to this authority's boundary, it needs to consider any potential cross boundary issues such as transportation, education and other social/community infrastructure.</p> <p>Section 2:</p> <p>The Regional Spatial Strategy has been reinstated as part of the development plan following the High Court decision on 10th November 2010. It will remain part of the development plan until the enactment of the Localism Bill which proposed to repeal Part 5 of the LD, ED & C Act 2009.</p>	<p>The Revised Preferred Option Core Strategy has revised Blackpool's required housing numbers following the proposed cancellation of regional housing targets and Regional Spatial Strategy. The Localism Bill has been enacted and it is an entirely logical way forward for a plan that is considering the housing requirement to 2027 to review the figure in light of the requirement of the Localism Act and the NPPF. The abolition of RSS is pending subject to the outcome of the environmental assessment.</p>

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					<p>Section 4:</p> <p>4.11: The Government published 'New Homes Bonus' consultation paper this month.</p> <p>Section 5:</p> <p>5.21/5.36: The Preferred Option proposed an extension of green belt. The paper refers to improving and enhancing the appearance of the Moss. This is not inconsistent with greenbelt designation: Paragraph 1.7 of PPG2 states that the quality of the landscape is not relevant to the inclusion of land within a Green Belt. It is not clear from the consultation paper whether it is intended to continue with the green belt extension or whether the proposed extension is not being pursued. The Marton Moss summary document</p>	<p>Comment noted.</p> <p>The Green Belt in south Blackpool is not being extended. A neighbourhood planning approach is now being promoted for the remaining lands at Marton Moss in the Revised Preferred Option Core Strategy to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development, including residential may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option.</p>

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					<p>appears to abandon the proposed extension of greenbelt</p> <p>5.26: The judicial review in the Council's decision to give Kensington Developments permission to build 584 houses on land off Moss House Road will be heard in the High Court in Manchester on 7th January 2011.</p> <p>5.43: The 200 dwellings referred to do not appear to carry forward into the Overall Summary Reassessment of Policy S3 in Appendix 2.</p>	<p>Comment noted.</p> <p>The revised housing figure is set out in Policy CS2 of the Revised Preferred Option Core Strategy. Refer to comments above on the neighbourhood planning process.</p>
CSH75	Closelink Ltd	C/O CA Planning 7 East Cliff Preston PRE1 3JE	N/A	N/A	Do not support the exclusion of land at Whyndyke Farm as a residential allocation. A key element of the site now benefits from planning permission for a mental health facility and hence the principle	Points noted. The Revised Preferred Option acknowledges that outline planning permission has been granted for a mental health facility. The remainder of the land at Whyndyke has been identified for around 150 dwellings. Refer to

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					<p>of an extension to the urban form on the eastern side of Preston New Road has been accepted.</p> <p>Development for residential on the remainder of the land within Blackpool would complement the extended urban form and benefit from the extended infrastructure and highway improvements. Consideration needs to be given to the potential comprehensive development of the Whyndyke landholding. Please refer to our representation submitted to the Core Strategy Preferred Option Consultation.</p>	Policy CS26 South Blackpool Housing Growth.
CSH76	Fylde Borough Council	Town Hall Lytham St. Annes Lancashire FY8 1LW	N/A	N/A	The opportunity to comment upon Blackpool Core Strategy's revised housing figures is welcomed. Whilst it is noted that this report specifically focused on proposed changes to Blackpool's Policy S3 Strategic Housing Sites, at this time an Infrastructure and Delivery Plan has not been prepared	The draft Core Strategy has been subject to further revision and a Revised Preferred Option May 2012 has been produced for consultation. The Infrastructure and Delivery Plan is currently being prepared and will be published at the Pre Submission stage.

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					<p>which would demonstrate the deliverability of the proposals, and more importantly how the various potential adverse impacts are to be mitigated. The concerns I raised previously are therefore sustained in that respect.</p> <p>In addition to the above I am not aware that an updated Sustainability Appraisal (SA) has been prepared so as to accompany this revised consultation document. The concerns I raised previously with regard to the SA are therefore now even more prevalent given a reduced number of dwellings in the area previously referred to as the 'M55 Hub Growth Point', now referred to as 'South Blackpool'. The question remains to be answered as to whether South Blackpool, rather than wider development at the M55 Hub, remains the most sustainable option based upon an even greater reduction in</p>	<p>The Revised Preferred Option Core Strategy has been subject to a further Sustainability Appraisal May 2012 which will be published alongside the Revised Preferred Option for Consultation.</p>

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					<p>development.</p> <p>In the absence of an Infrastructure and Delivery Plan and a revised Sustainability Appraisal, the comments made here are without prejudice.</p> <p>One of the key influences to review Blackpool's housing development proposals was understandably the announcement on 6th July 2010 by the Secretary of State for Communities and Local Government to revoke Regional Spatial Strategies. You will of course be aware that subsequent to the publication of this consultation document this revocation has been deemed to be unlawful. Clarification is therefore sought as to what Blackpool Council's current position is concerning regional housing requirement targets. i.e.: Is the 444 dwellings per annum target to be re-planned for?</p>	<p>The Revised Preferred Option Core Strategy (May 2012) has revised Blackpool's housing numbers following the proposed revocation of regional housing targets and Regional Spatial Strategy. The Localism Bill has been enacted and it is an entirely logical way forward for a plan that is considering the housing requirement to 2027 to review the figure in light of the requirement of the Localism Act and the NPPF. The abolition of RSS is pending subject to the outcome of the environmental assessment.</p>

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					<p>PPS3 states that local Planning Authorities should plan for a mix of housing, including the need to accommodate Gypsies and Travellers. Whilst noting that this consultation document is specific to 'the need for new homes', the need of Gypsies and Travellers appears to have been omitted from this document. The comments which I submitted in response to the Preferred Option are re-emphasised regarding the Gypsy and Traveller Accommodation Assessment (GTAA). I ask you to clarify that the GTAA will be used as a starting point in reviewing levels of provision and that Gypsies and Travellers needs will be included in a revised Policy S3.</p> <p>Notwithstanding the above and in advance of the clarification sought, I provide the following comments based upon a revised housing figure for lands at Marton Moss which comprises 1684</p>	<p>The policy relating to Gypsies, Travellers and Travelling Showpeople has been fully redrafted in the Revised Preferred Option.</p> <p>The Revised Preferred Option Core Strategy (May 2012) sets out a revised housing figure in Policy CS2 to accommodate 4500 new homes within the Borough to 2027. Policy CS26 identifies land a Moss House Road. for around 600 dwellings and</p>

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					<p> dwellings (584 Area A; around 900 Area B; and 200 Area C). In the case of the latter area paragraph 5.43, page 16 of the report states around 200 dwellings could come forward from the lands south of Progress Way in the period to 2027. What is not clear however is how this is factored into the Summary Reassessment of Policy S3 presented on page 35. Clarification is therefore sought as to whether 'Strategic development site at Marton Moss' should read 1700, not 1500.</p> <p>I acknowledge the reference made to Fylde Borough Council's response to the Core Strategy Preferred Option at para 5.29 of your consultation document. It remains the case that I cannot, at the time of writing, support a Preferred Option which is dependant upon significant development in Fylde at the end of the M55. What was previously</p>	<p>at Mythop Road for 150 dwellings. In addition a neighbourhood planning approach is now being promoted for the remaining lands at Marton Moss in the Revised Preferred Option Core Strategy to develop neighbourhood policy which supports the retention and enhancement of the distinctive character of the Moss whilst identifying those circumstances where development, including residential may be acceptable. This approach is reflected in Policy CS27 of the Revised Preferred Option. The allocation for 900 dwellings north of Progress Way has been removed from the revised policy.</p> <p>Refer to previous comment on Sustainability Appraisal May 2012 and the neighbourhood planning approach for the remaining lands at Marton Moss.</p>

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					<p>unclear was that development on lands in Blackpool could seemingly take place independent of either substantial or very limited development on the Fylde side of the boundary. Whilst Blackpool Council's position regarding wider development on lands at Marton Moss has now been clarified (pages 28 - 29); what remains unclear is whether strategic development on the edge of Blackpool, specifically on lands at Marton Moss, would be the most sustainable option for Blackpool. The aforementioned concerns and clarity which would be offered by an updated SA are therefore outstanding.</p> <p>Although there is a reduction from 2,700 dwellings on Marton Moss in the Preferred Option to 1,684 dwellings in this revised consultation document, a significant amount of development is still</p>	<p>The proposed housing provision in the Revised Preferred Option is for around 4,500 dwellings as set out in Policy CS2. Further detail on this provision is set out in the Housing Technical Paper May 2012. The housing provision in South Blackpool is set out in Policy CS26</p>

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					<p>proposed on lands which adjoin Fylde Borough's boundary. Your report states "...the revised Blackpool Core Strategy should more clearly re-focus its presentation of proposals within Blackpool. This represents no change in policy...but the re-titling of the section relating to the lands at Marton Moss within Blackpool." The proposed reduction of circa 1,000 dwellings on lands in Blackpool at Marton Moss and removal of the proposed extension to the South Blackpool Green Belt would however appear to represent a change in policy.</p> <p>I note that you refer to the final report by DLA (page 30). You will of course be aware that DLA documented the whole issue concerning critical mass of development; "If a critical mass of development is not achieved, the area is vulnerable to a series of adhoc and incremental</p>	<p>identifying a total of 750 new dwellings on land at Moss House Rd. and at Mythop Road. The supporting text to this policy also makes reference to submission of the application to develop lands around Whyndyke . In addition reference is made to the release of further housing land at Whyndyke needing to be fully informed as a part of a comprehensive assessment and that the Fylde Core Strategy will further inform the way forward. The issue of development at Whyndyke is also included in the 'Memorandum of Understanding' that has been drawn up by the Fylde Coast Authorities.</p> <p>Refer to previous response regarding a neighbourhood planning approach to the remaining lands at the Moss.</p>

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					<p>developments which do not deliver the wider benefits of comprehensive growth, such as delivery of a secondary school and country park.” Irrespective of Fylde Borough Council’s position regarding lands at the Hub; I would ask you to confirm that the proposed reduction of circa 1,000 dwellings on lands in Blackpool at Marton Moss is a definitive move away from the comprehensive approach indicated by DLA.</p> <p>An approach which enhances and improves the appearance, and supports the long term future, of the remaining lands south of Progress Way is supported.</p> <p>Page 29, para 4 makes further reference to the Fylde Coast MAA. So as to avoid repeating myself, I please ask that you revisit the comments which I submitted in response to the Preferred Option. i.e.: this has not been agreed through the</p>	<p>Refer to previous response regarding a neighbourhood planning approach to the remaining lands at the Moss.</p> <p>The draft Core Strategy has been further revised and a Revised Preferred Option May 2012 has been prepared for consultation. In conjunction with the reduced housing numbers, the revised edition gives increased emphasis to future employment provision within</p>

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					<p>LDF process.</p> <p>In summary, by now moving away from what was an M55 Hub focused Core Strategy, the need for both Blackpool's emerging Infrastructure and Delivery Plan and an updated Sustainability Appraisal is critical. In the absence of these key components I believe there are cross-boundary issues of significance which still need to be addressed. Consequently prior to a formal Regulation 28 document, I look forward to commenting upon a reworked Preferred Option in its entirety.</p>	<p>Blackpool. Specific quantum references to employment land requirements in Fylde are not set out in the document. A Fylde Coast Sub-Regional Employment Land Statement has been revised and updated for Blackpool, Fylde and Wyre and will form part of the evidence base informing the Core Strategy.</p> <p>As set out above, a further reiteration of the Sustainability Appraisal and the Infrastructure and Delivery Plan will be completed to inform and subsequently be published alongside the revised edition of the Core Strategy. A Memorandum of Understanding has been drawn up between the Fylde Coast Authorities in response to the Duty to Co-operate which includes strategic cross boundary issues relating to housing and employment land on South Blackpool/Fylde boundary around Junction 4 of the M55. Consultation and liaison will continue in advance of a formal Regulation 22 document.</p>
CSH77	Mr Hennessy	Fylde Foreign	Support	Support	Although I have no objection	Current planning policy maintains a

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		Bird Farm Kitty Lane Blackpool FY4 5EF			to the proposed building plan. I am grieved because on various occasions in the past I have applied for planning permission on my land and it is the only parcel of land not built on down Kitty Lane. Should I submit a planning application for a house??	restrictive policy towards the construction of new buildings on this area of the Moss. The Revised Preferred Option Core Strategy sets out the proposed neighbourhood planning approach in Policy CS27. Until a neighbourhood Plan or Site Allocations DPD is published a restrictive policy stance towards new build development in this area is retained.
CSH78	Network Rail	-	N/A	N/A	No comment to make.	Noted.

Appendix I - Revised Preferred Option Consultation Material

Email sent to all those on the Consultation Database - 7th June 2012

We want your comments!

Dear Sir/Madam

Blackpool Council is currently consulting on **Blackpool Local Plan Part 1: Core Strategy - Revised Preferred Option**. It will be available for you to view and comment between the following dates:

Start date: 07/06/12 09:00

End date: 20/07/12 17:00

Please select the following link to view this event:

<http://consult.blackpool.gov.uk/portal/csrpo>

If the link appears to be broken, please try copying the entire link into the address bar on your web browser.

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Date: 1st June 2012

Address

Our Ref: RPO

Direct Line: 01253 476237

Email: development.plans@blackpool.gov.uk

Dear Sir / Madam

**BLACKPOOL LOCAL PLAN
PART 1: CORE STRATEGY - REVISED PREFERRED OPTION**

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

We are consulting you again because we have made major changes to the Core Strategy since previous consultations in 2010.

Consultation commences Thursday 7th June and continues until 5pm Friday 20th July 2012

The Revised Preferred Option and other supporting documents are available to view and comment on at:

www.blackpool.gov.uk/corestrategy

The Revised Preferred Option and Sustainability Appraisal are also available to view during normal opening hours at:

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

This is your opportunity to comment on the policies and proposals for Blackpool. We are keen to hear your views. If you have any questions about the Core Strategy Revised Preferred Option, please do not hesitate to contact us.

Yours faithfully

Ms Jane Saleh
Head of Development Plans and Projects



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

Contact
T: (01253) 477477
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www.blackpool.gov.uk

BLACKPOOL BOROUGH COUNCIL

**Planning and Compulsory Purchase Act 2004
The Town and Country Planning (Local Planning)
(England) Regulations 2012**

Blackpool Local Plan

Part 1: Core Strategy - Revised Preferred Option

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

The Revised Preferred Option, Sustainability Appraisal and Comments Form are available to view and download from the Council's website www.blackpool.gov.uk/corestrategy. They are also available for inspection at the following locations during normal opening hours at: Customer First Centre, Corporation Street, Blackpool; and all libraries across the Borough.

Representations can be made electronically through the consultation portal <http://consult.blackpool.gov.uk/portal> or by email: development.plans@blackpool.gov.uk or by post: Development Plans and Projects, Blackpool Council, PO Box 17, Corporation Street, FY1 1LZ.

**The period for making comments on the document is
Thursday 7th June 2012 to 5pm Friday 20th July 2012**
Dated this 7th day of June 2012

**Mark Towers, Head of Democratic Services
PO Box 1066, Town Hall, Blackpool FY1 1GB**

Press Release

Have Your Say on Blackpool's Core Strategy

Blackpool residents and businesses are to be consulted on the Council's future development priorities. They will have six weeks to share their views from June 7.

The Council's Executive gave the go-ahead this week for the public consultation on its revised Core Strategy.

This is a key planning document which sets out future development priorities for the resort until 2027.

Coun. Gary Coleman, Cabinet member for Regeneration and Urban Development, said: "We want to hear the views of Blackpool's residents, businesses, organisations and other people with interests in the town, so together we can shape Blackpool's future development.

"This is an opportunity for the community and other stakeholders to be involved in choosing the right planning policies for the town."

He added: "The Core strategy provides the statutory planning framework to guide the changes needed to regenerate the town and economy."

It details:

- where new housing, retail, business and leisure development should take place
- which areas are earmarked for regeneration or protection
- development principles

There have been significant changes to the Core Strategy since previous consultations in 2010. These changes include:

- A reduced housing provision – from 444 to 300 dwellings a year.
- Of these houses some 600 will be at Moss House Road and around 150 at Whyndyke Farm, but no new houses are allocated on remaining land at Marton Moss.
- Proposals for a neighbourhood planning approach for the remaining lands at Marton Moss, providing the community with the opportunity to help develop neighbourhood policy.

Further consultation and examination stages will follow and it's hoped the Core Strategy will receive final approval by December 2013.

You can view the Council's Core Strategy Revised Preferred Option and make comments online (from 7th June onwards) at <http://www.blackpool.gov.uk/corestrategy>

The document and comment forms will also be available at the Customer First Centre in Municipal Buildings and libraries across the town.

There will be an exhibition on 5th July on the neighbourhood planning process for Marton Moss. Full details will be publicised in advance on the Council's website and in the local area.

Consultation Response Form

Blackpool Core Strategy: Revised Preferred Option – HAVE YOUR SAY



Please complete the form below, if you have any comments about the Core Strategy Revised Preferred Option. Where possible, comments should refer to specific paragraph numbers.

Chapter 2 - A Spatial Portrait of Blackpool:

1. Does the Spatial Portrait accurately describe Blackpool? Yes No

If not, please explain why.

2. Have we identified all the overarching issues for Blackpool? Yes No

If not, please explain why.

Chapter 3 - Spatial Vision and Objectives:

3. Do you agree with the Spatial Vision for Blackpool? Yes No

If not, please explain why.

4. The Objectives will deliver the Spatial Vision. Do you agree with the objectives? Yes No

If not, please explain why.

5. Do you have any comments to make on Policy NPPF1 and the supporting text?

Chapter 4 - Spatial Strategy:

6. Do you have any comments on the Key Diagram?

Chapters 4-8:

7. Do you have any comments to make on the policies and supporting text? Please state paragraph number you are referring to.

Policy Number and Name:
Comments:

PTO

Policy Number and Name:
Comments:

General Comments

10. Do you have any other comments to make on the Core Strategy Revised Preferred Option, including the appendices?

Please continue on a separate sheet if necessary

Policy CS16 - Blackpool Town Centre:

8. Do you agree with the proposed Town Centre boundary?

Yes No

If not, please indicate which streets you would include/remove and why.

11. Do you have any comments to make on the Sustainability Appraisal?

Policy CS24 - Off Promenade Holiday Accommodation

Please note: We are not asking for comments in relation to the precise holiday accommodation area boundaries. These are set out in the adopted Holiday Accommodation SPD which is not part of this consultation.

9. Do you agree with the approach set out in Policy CS24 in relation to Off Promenade Holiday Accommodation Areas?

Yes No

If not, please explain why.

Name _____

Address _____

Email Address _____

Please return to:

Post: Development Plans and Projects, PO Box 17, Corporation Street, Blackpool FY1 1LZ

Email: development.plans@blackpool.gov.uk

Online: www.blackpool.gov.uk/corestrategy

For further information, please call 01253 477477

Do you have any comments to make on the alternative options previously discounted?





DESTINATION HOPE: The Winter Gardens and (above) a conference at the venue

Complex still key

PLANS for a new purpose-built conference centre in Blackpool are now firmly in the past, with the Winter Gardens the focus for future investment.

While it is accepted the Victorian complex cannot compete with modern conference venues, the council hopes the centre can re-establish itself as a destination of national importance.

The revised core strategy, which is due to go before the council's executive next Wednesday, sets out possible uses for the Winter Gardens including for a cinema, casino, museum, restaurants and cafes.

It is hoped to secure investment to refurbish the buildings and provide improved conferencing and exhibition space.

Retail uses which link in with the rest of the town centre, a hotel or serviced apartments, and improved car parking will also be supported by the council.

The report to councillors says the complex "is struggling to compete with larger, more modern conference venues across the UK."

But it adds the council is "actively looking to secure medium-long term investment to facilitate major refurbishment and re-establish the

Winter Gardens as a mid-size, multi-purpose conferencing venue with a national profile."

The council purchased the venue in 2010 as part of the £40m deal which also included The Tower and the Golden Mile Centre. Work has already been undertaken to upgrade areas including the Floral Hall.

The strategy adds: "The Winter Gardens has great potential to strengthen and widen its range of uses through sensitive remodelling and enhancement."

"It offers exceptional opportunities to locate year round leisure uses in the heart of Blackpool town centre."

Quality does it's price

- Windows • fitted kitchens
- doors • conservatories
- fascias • wood flooring
- soffits • GRP flat roofing



BUDG



Leisure hopes for central site

A VITAL strand of Blackpool's regeneration is poised to begin this year with the start of work on the new Central Business District.

Planning permission is already in place for a new Sainsbury's supermarket, the refurbishment of the Talbot Road Bus Station and council offices which make up the first phase of the scheme.

Town hall chiefs are working with Muse Developments to deliver the first phase of the ambitious project.

The revised core strategy reinforces the council's commitment to future stages of the transformation of the area around North Station which include the relocation of the police station and law courts and a new public transport interchange.

The report says redevelopment of this area is "central to Blackpool's ambition of creating an attractive business district."

Other elements of the strategy also focus on the Leisure Quarter on Central Station car park, once earmarked for the resort's supercasino.

The council remains committed to securing a leisure use of national significance to the site.

The strategy says: "Comprehensive redevelopment of the entire site will be promoted and encouraged for major leisure development of national significance, where the cumulative impact of



HOPE FOR FUTURE: The vision for the Central Business District

a single or group of leisure uses will provide a compelling new reason to visit Blackpool."

Town hall chiefs are still working with operators who hope to bring an indoor ski-slope experience to the site although no firm plans have yet to come forward.

If the revised core strategy is approved by the executive, it will go out to further public consultation before being submitted to the planning inspectorate next year.

It will then be examined by a planning inspector, and is not due to be formally adopted by the council until December 2013.

HIC

Small family run
34 years of flair!

WE WILL NOT
On design

- Whatever your taste at an ideal price...
- Modern, Contemporary little different, unique
- Designed exclusively
- All building work
- Bespoke Cabin
- Bespoke Bedr
- Just doors - For

47 Harrow

Political writer
Shelagh Parkinson
reports on new plans
which set out priorities
for the future of
Blackpool

PLANS to build up to 5,000 homes on Marton Moss look set to be scrapped under a new planning framework for Blackpool.

A revised core strategy is proposing to limit residential development on the outer edges of the resort to just 750 dwellings on the Moss and 150 on that area of the Whyndyke Farm site in Marton which falls within Blackpool's boundaries.

It follows an outcry from the community over the previous proposals.

Changes at national level mean Blackpool's annual house-building targets have been reduced from 444 a year, to around 300.

This will be met using land in the existing urban area, by developing regeneration sites, from conversions and as a result of seafront properties reverting to residential use.

It means the total requirement for 4,500 new homes in the borough between now and 2027 can be met.

Blackpool Council leader Coun Simon Blackburn said: "We have fought two elections in Stanley ward on the basis of preventing any further large-scale development on Marton

End to Moss homes vision



PROTECTION:
Marton Moss,
where proposals
for as many of
2,000 homes
have been
scrapped

Moss, and are pleased to be able to enshrine this principle in the council's core strategy.

"We trust the planning inspectorate will agree with our analysis.

"Blackpool has very few green open spaces, and to suggest 5,000 properties should be built on one of those spaces

struck us as simply wrong.

"Sadly it is not possible for us to rescind the planning consent granted by the Tories for 584 properties on the Moss, but we are saying there is to be no more.

"We are committed to meeting Blackpool's housing needs from existing

What do you think of Blackpool's new masterplan? E-mail letters@blackpoolgazette.co.uk or write to the address on Page 12

brownfield sites, infill developments nearer to the town centre, and development of the Whyndyke site.

"I am also working closely with the leaders of Fylde and Wyre councils to ensure more joined-up strategic planning when it comes to sites for housing."

Blackpool South MP Gordon Marsden, who has consistently called for the Moss to be preserved, said: "It gives us the opportunity for some positive thought about how the green space we have on Marton Moss can contribute to the potential for green tourism, eco-business."

shelagh.parkinson@blackpoolgazette.co.uk

July 4, 2012

Rallying cry in homes battle

By **SHELAGH PARKINSON**

RESIDENTS are being urged to make their voices heard over the future of Marton Moss.

A new planning framework for the area seeks to put the community at the centre of future decisions.

In recent years there have been battles over plans to build houses on the land.

Now Blackpool Council wants to limit residential development from around 5,000 homes to 750.

And Angelia Hinds, of the Save The Moss campaign, told *The Gazette*: "Unfortunately, recent decisions by planning inspectors to allow further developments of 83 homes at Runnell Farm and 1,150 at the Queensway site mean planning permissions now exist for a total of 1,817 new homes in the Moss area.

"In order that we are able to protect what is left of the Moss for future generations, it is extremely important we attend this exhibition to make our views heard and to be involved in the process."



SPEAKING UP: Angelia Hinds and Coun Gary Coleman

Coun Gary Coleman, cabinet member for planning and regeneration, said the council wanted to take a neighbourhood planning approach to future development on the green land.

He said: "In respect of Marton Moss, we feel residents should be heard and not just fall victim to big property developers' plans.

"We want to safeguard the essentially green open nature of the area.

"We are not saying no development whatsoever can take place on the Moss, but we feel small, limited development using a neighbourhood planning approach which takes into account the community's views is the best way forward."

Kensington Developments also has planning permission to build 584 houses on Moss House Road, and 83 houses on land at Runnell Farm, off Chapel Road, both on Marton Moss.

Tomorrow's exhibition is open from 2pm until 8pm at South Shore Tennis Club, Midgeland Road, when planners will also be on hand to discuss the proposed Core Strategy, which contains plans for the area and is out to consultation until July 20.

shelagh.parkinson@blackpoolgazette.co.uk

Fight taken to town hall

Hoteliers hand over petition in tourism row

By SHELAGH PARKINSON

HOTELIERS handed over a petition signed by more than 400 people supporting their bid to be reinstated in the tourism area.

Guesthouse owners want Station Road, Cebourne Road and Withnell Road to be put back in the designated holiday zone.

The area was taken out in 2010 when town hall planners decided to shrink Blackpool's tourism footprints in order to tackle the over-supply of holiday accommodation.

But business owners say the move is blighting the area.

Chris Allan Graham from the Queen Victoria Hotel, Station Road, said: "We feel getting back into the holiday zone would be the first step towards improving things in this area."

"More than 400 people have signed our petition, and we believe we could have got even more signatures if we had had more time."

"It proves there are a lot of people out there who are in support of seeing some kind of regeneration here."

Do you agree that the area should be reinstated in the holiday zone? E-mail letters@blackpool-gazette.co.uk or write to the address on Page 10

"We would like to thank our local councillors and all the people who signed the petition for their support."

"We are optimistic the council will listen favourably to what we are asking for."

Gill Wilton, of the Keighley House Hotel on Withnell Road, said: "Blackpool is a holiday town and it should be a holiday zone rather than designated areas."

"Everyone should be entitled to the same, rather than there being winners and losers."

"Nobody refused to sign our petition and it just goes to show the strength of feeling there is in the town."

Those who signed included hoteliers, residents and visitors to the area.

The petition was handed over to the Blackpool Council treasurer Steve Thompson.

Town hall chiefs promised to listen to the concerns of the campaigners.

Coun Gary Coleman, cabinet member for regeneration and urban development on the council said: "We know the holiday accommodation areas do cause concern for some residents and businesses."

"As a council we are more than happy to meet with people whenever they have an issue they want to raise with us."

The hoteliers say the loss of the protected status has devastated the area and encouraged the growth of houses of multiple occupation (HMOs) with undesirable tenants.

They have been campaigning for more than 18 months and have already held a meeting with Blackpool Council chief executive Neil Jack to put their case forward.

It is hoped improvements in the area would also help cut down on incidents of antisocial behaviour.

Shelagh.parkinson@blackpoolgazette.co.uk

Twitter Feed

The screenshot shows the Twitter profile for Blackpool Council (@BpoolCouncil). The profile header includes the council's name, handle, and a bio: "Follow for news/updates from around Blackpool. You can phone the Council on 01253 477477. Please note we may not be able to respond to questions straight away." It also lists 3,316 tweets, 130 following, and 3,423 followers. The main content area displays a list of tweets. The third tweet, dated 1 hour ago, is highlighted with a red box. It reads: "Share your views about Blackpool's future - comment on the Council's revised Core Strategy by July 20. [ow.ly/bFSGP](#)". The browser's address bar shows the URL "https://twitter.com/#!/BpoolCouncil".

Blackpool Council @BpoolCouncil
Follow for news/updates from around Blackpool. You can phone the Council on 01253 477477. Please note we may not be able to respond to questions straight away.
Blackpool <http://www.blackpool.gov.uk>

Tweet to Blackpool Council
@BpoolCouncil

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Expand
- Blackpool Council** @BpoolCouncil 56m
JOB: Receptionist/Clerical Assistant - Blackpool CouncilWe are looking to appoint a highly motivated and enthusiasti... [ow.ly/1kGITP](#)
Expand
- Blackpool Council** @BpoolCouncil 1h
Share your views about Blackpool's future - comment on the Council's revised Core Strategy by July 20. [ow.ly/bFSGP](#)
Expand
- Blackpool Council** @BpoolCouncil 1h
JOB: Teaching Assistant Level 1 (3 Posts) - Blackpool Council

Core Strategy Webpage on Council Website

Blackpool Council

Home | Contact Us | Help | Text Only | Accessibility | Whats New

A B C D E F G H I J K L M N O P Q R S T U V W X Y Z Search: Go

Home | Environment and Planning | Planning Policy | Local Development Framework

Blackpool Core Strategy



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

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

We have made major changes to the Core Strategy since the previous consultations in 2010. These changes include:

- A reduced housing allocation for the 15 year plan period
- Proposing a neighbourhood planning approach for the remaining lands at Marton Moss which will provide the community with the opportunity to directly determine the future for their area.

We are now going out to consultation on the **Revised Preferred Option**. We want to hear the views of Blackpool's residents, businesses, organisations and other people with interests in the town, so together we can shape Blackpool's future development. The period for making comments on the document is:

Thursday 7th June 2012 to Friday 20th July 2012 at 5pm

How to Comment

You can choose to make comments on the Revised Preferred Option by:

- Using the Council's online consultation version of the document using [this link](#)
- Downloading and completing a copy of the "Comments Form" from [this link](#)
- Obtaining a Comments Form from the following locations during normal opening hours:
 - Customer First Centre, Municipal Buildings, Corporation Street
 - All libraries across the Borough

The Revised Preferred Option Document and Sustainability Appraisal are also available to view at these locations.

Marton Moss

We are holding a public exhibition on **Thursday 5th July 2012 - 2pm-8pm** at **South Shore Lawn Tennis Club, Midgeland Road.**

This will provide Marton Moss residents, businesses and other interested parties the opportunity to find out more information about the revised proposals for the area.

What Happens Next

Following consideration of all comments on the Revised Preferred Option, the Council will publish its Core Strategy Document which, after final consultation will be submitted to the Secretary of State. An independently appointed Inspector will then examine the Core Strategy and we anticipate this to take place in 2013.

DOCUMENTS AVAILABLE – TO VIEW ON LINE

Revised Preferred Option

- [Revised Preferred Option](#)
- [Key Diagram](#)
- [Comments Form](#)

Turn off expanding menu

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- [Transport and Streets](#)
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Blackpool Council

Customer First Centre

Tel: (01253) 477477

Customer First Centre
Monday to Friday 8.30am-5.15pm
Saturday Closed

Customer First Telephone Line
Monday to Friday 8.30am-5.15pm
Saturday Closed

Municipal Building
Corporation Street
Blackpool
FY1 1NF

View map

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- [Affordable Housing](#)
- [Supplementary Planning Document](#)
- [Blackpool Core Strategy](#)
- [Holiday Accommodation SPD](#)
- [M55 Hub](#)
- [New Homes from Old Places](#)
- [The Leisure Quarter](#)

Contact Details

PO Box 17
Municipal Buildings
Corporation Street
Blackpool
FY1 1LZ

Email: [Click to email](#)
Tel: 01253 477477
Fax: 01253 476201

9am to 5pm Monday to Thursday and 9am to 4.30pm on Friday

Marton Moss Drop In Event – Letter to residents

BlackpoolCouncil

Date: 25th June 2012

Address

Our Ref: RPO-MM

Direct Line: 01253 476237

Email: development.plans@blackpool.gov.uk

Dear Sir / Madam

BLACKPOOL LOCAL PLAN
PART 1: CORE STRATEGY - REVISED PREFERRED OPTION

Marton Moss Public Exhibition – Thursday 5th July 2012

Blackpool Council is currently consulting on the **Blackpool Core Strategy - Revised Preferred Option**. This is the key planning document for Blackpool which sets out where new development including housing and employment, retail and leisure should be located to meet Blackpool's future needs to 2027.

We have made major changes to the Core Strategy since previous consultations in 2010 which include:

- A reduced housing allocation from 444 dwellings per year to 300 dwellings for the 15 year plan period.
- Proposing a neighbourhood planning approach for the remaining lands at Marton Moss which will provide the community with the opportunity to directly determine the future for their area.

We would like to invite you to attend a public exhibition to find out further information and take the opportunity to discuss the proposals for Marton Moss. We are keen to hear your views.

The public exhibition will take place on:

Thursday 5th July 2012

2pm-8pm

at South Shore Lawn Tennis Club, Midgeland Road, Blackpool

If you have any queries about the Core Strategy Revised Preferred Option or the contents of this letter, please do not hesitate to contact us. You can find further information on the Core Strategy at www.blackpool.gov.uk/corestrategy.

Yours faithfully

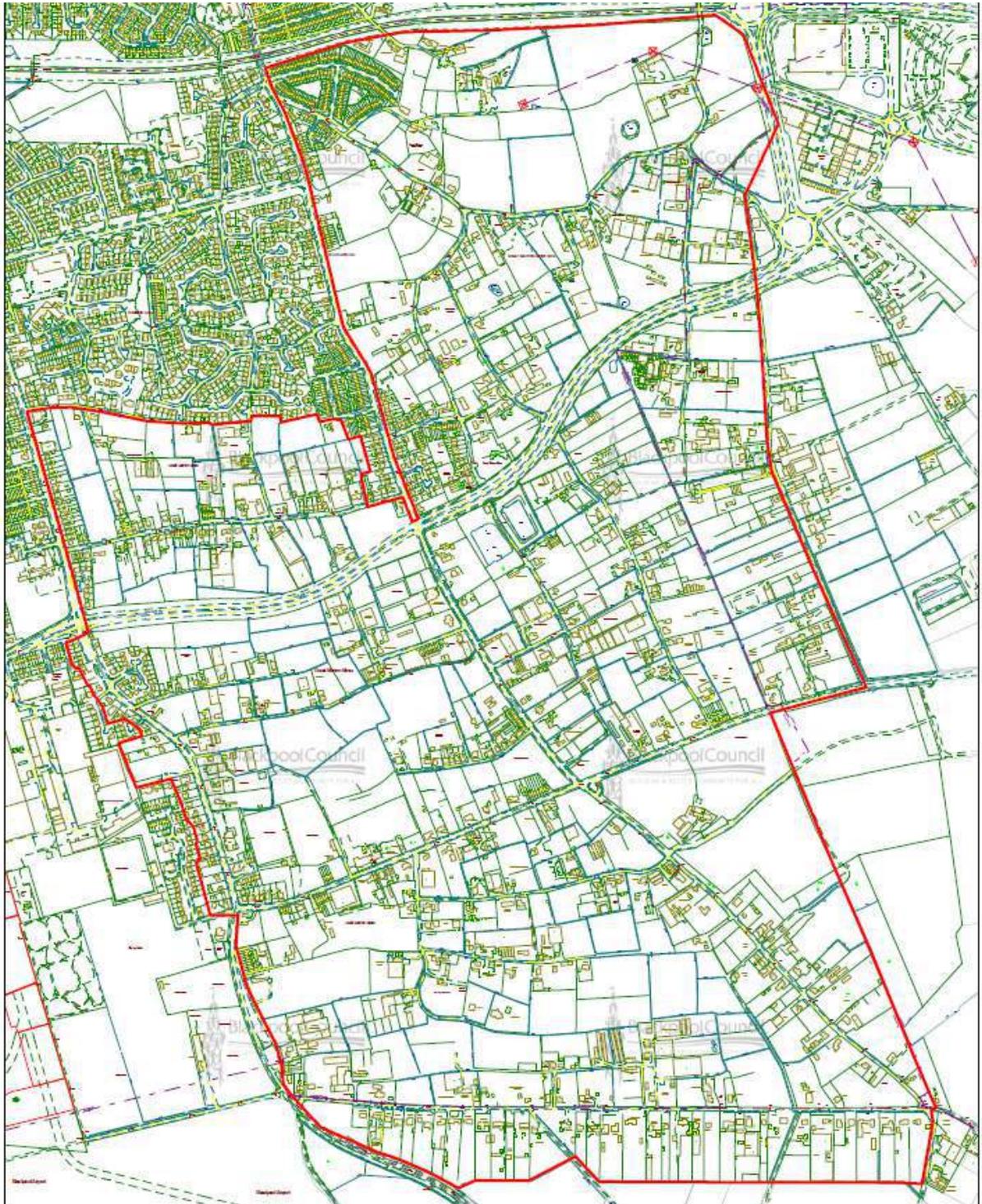
Ms Jane Saleh
Head of Development Plans and Projects



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

Contact
T: (01253) 477477
E: development.plans@blackpool.gov.uk
www.blackpool.gov.uk

Marton Moss Letter Distribution Area



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BLACKPOOL CORE STRATEGY – REVISED PREFERRED OPTION

MARTON MOSS PUBLIC EXHIBITION

**THURSDAY 5TH JULY 2012
2PM-8PM**

**SOUTH SHORE LAWN TENNIS CLUB
MIDGELAND ROAD
BLACKPOOL**

Blackpool Council is consulting on its Core Strategy – Revised Preferred Option.

A public exhibition is being held regarding the proposals for Marton Moss. We would like to take the opportunity to discuss these proposals with you.

For further information, please contact the Development Plans Team: Tel: 01253 477477, or email: development.plans@blackpool.gov.uk



Neighbourhood Planning Process

The Core Strategy

The Core Strategy is a key planning document for Blackpool. It sets out where new development, for example housing, employment, retail and leisure, should be located to meet Blackpool's future needs to 2027. The Core Strategy Revised Preferred Option is currently out to public consultation (7th June 2012 to 20th July 2012) and comments are invited on the proposed policies and approaches.

What does the Core Strategy say about Marton Moss?

The Core Strategy identifies the remaining lands at Marton Moss as being integral to the local distinctiveness of Blackpool and that it is valued by the local community. A neighbourhood planning approach is proposed to develop a policy framework for the area (see Policy CS27 of the Core Strategy Revised Preferred Option).

This approach means getting the community more involved in deciding what it wants for the area, for example how to retain the Moss' distinctive character as well as deciding where and what type of development may be acceptable.

There are two ways which we can go about developing this policy framework.

- One way is setting it out in a community led **Neighbourhood Plan**.

- The other way is setting it out in a local authority led **Site Allocations and Development Management document**.

What is a Neighbourhood Plan?

The new Localism Act provides additional rights and powers for communities to influence and shape new development in their area. It allows a community to prepare a Neighbourhood Plan which sets out policies for the use and development of land in a specific Neighbourhood Area.

These policies can be about the type, design, location and mix of development as well about retaining and protecting important buildings and open spaces.

The policies can be detailed or general, but they have to be in line with the strategic policies of the Core Strategy and also with government policy set out in the National Planning Policy Framework.

To produce a Neighbourhood Plan you have to set up a Neighbourhood Forum in areas where you do not have Parish Councils.



What is a Neighbourhood Forum?

In Blackpool if a community wants to prepare a Neighbourhood Plan for their area they need to set up a Neighbourhood Forum. This Forum can include residents, businesses and local councillors. As a minimum, the Neighbourhood Forum should:

- be open to those living and working in the Neighbourhood Area,
- have a written constitution, and
- have at least 21 members.

The local authority has to agree and formally designate the Neighbourhood Forum.



How would Blackpool Council help the community prepare a Neighbourhood Plan?

If the local community wants to prepare a Neighbourhood Plan for Marton Moss, the plan would be led by the community with the Council providing assistance. This assistance could involve:

- Sharing evidence and information on planning issues;
- Helping with consultation events;
- Providing advice on assessments and evidence;
- Providing advice on whether emerging policies in the Neighbourhood Plan fit with national and core strategy policies;
- Helping the community communicate with external partners where required.



What are the key stages in preparing a Neighbourhood Plan?

There are a number of key stages which the community need to do to prepare a Neighbourhood Plan. These are:

1. Defining the neighbourhood – The Neighbourhood Area to which the plan relates has to be agreed by the community and local authority.

2. Preparing the plan – The Neighbourhood Forum prepares the plan. Before submitting a plan proposal to the local authority, the Neighbourhood Forum will need to publicise and consult on the plan.

3. Independent check – The Neighbourhood Plan is submitted to the local authority who will then appoint an independent examiner to consider the plan, including whether the plan is in line with national policy, the strategic policies of the Core Strategy and with other laws and obligations. The examiner can recommend whether the plan is put to a community referendum, or that the plan should be modified.

4. Community referendum – The local authority will organise a community referendum on the Neighbourhood Plan. If the plan is approved by a majority of those voting in the referendum, the local authority will approve the Neighbourhood Plan.

5. Legal status – Once approved, the plan will then become a part of the development plan for the area and will be used for making decisions on planning applications in the Marton Moss area.

You can find further information on neighbourhood planning on the following websites:

Planning Portal: <http://www.planningportal.gov.uk/inyourarea/neighbourhood/>

Department for Communities and Local Government: <http://www.communities.gov.uk>



What happens if the community do not want to prepare a Neighbourhood Plan?

If the community do not want to prepare a Neighbourhood Plan, local planning policy for the Marton Moss area will be developed as part of a Site Allocations and Development Management document. This document is produced by the local authority engaging with and involving the community to get the right policies for the area.

A Site Allocations and Development Management document identifies sites for development, or sites for safeguarding or protection and also includes development management policies to guide development. A specific section of this document would be about Marton Moss.

The keys stages in preparing the Site Allocations and Development Management document are set out below:

- 1. Scoping of issues and preferred options** – This involves engaging with the community to develop specific draft policies and proposals for Marton Moss which are then formally consulted on.
- 2. Pre-Submission** – The responses to the consultation at stage 1 are considered, a Pre Submission document is produced and further consultation with the community on the policies and proposals in the document is involved.
- 3. Submission** - The document along with all the comments received is submitted to the Secretary of State for examination.
- 4. Examination** of the Site Allocations and Development Management document by an Inspector, followed by the Inspector's Report and formal adoption.

How can I comment on the Core Strategy?

The Core Strategy Revised Preferred Option is out to public consultation between 7th June and 20th July 2012. During this time, we welcome your comments on the policies and supporting text set out in the Core Strategy, so together we can shape Blackpool's future development.

Comments can be submitted by:

Post: Development Plans and Projects, PO Box 17, Corporation Street, Blackpool, FY1 1LZ

Email: development.plans@blackpool.gov.uk

Online: www.blackpool.gov.uk/corestrategy



Core Strategy Revised Preferred Option Consultation June-July 2012

What is the Core Strategy?

- The Core Strategy is a key planning document for Blackpool
- It identifies where new development such as housing, retail and employment should be located and which areas should be regenerated, protected or enhanced

Preparation Stages

- There are a number of stages we must follow when preparing the Core Strategy. These provide an opportunity for the community and other stakeholders to be involved in preparing the most sustainable Local Plan for Blackpool.



What does the Core Strategy focus on?

Goal 1: Sustainable regeneration, diversification and growth

- Support new housing to deliver a choice of quality homes
- Strengthen the local economy through sustainable investment
- Create well-designed places and spaces for people to enjoy
- Address climate change issues with sustainable energy sources

Goal 2: Strengthen community well-being

- Develop sustainable and safer communities with good access to jobs, services and facilities
- Identifies priority inner area and outer estate neighbourhoods to regenerate and improve
- Meet residents' needs for affordable housing
- Improve the health and well-being of Blackpool's residents

Goal 3: Regenerate the town centre, resort core and inner areas

- Re-establish Blackpool Town Centre as the first choice shopping destination for Fylde Coast residents and an attractive place to visit and do business
- Support a high quality, year-round visitor offer including new high quality attractions, accommodation and conference facilities
- Balanced and stable communities in the inner areas by tackling housing problems, improving the environment and creating places where people want to live

Goal 4: Enabling South Blackpool Growth and Enhancement

- Support economic growth at Blackpool Airport Corridor and on lands close to Junction 4 of the M55
- Identify land at Whyndyke Farm and Moss House Road for 750 new dwellings
- Promote a neighbourhood planning approach for Marton Moss
- Improved connectivity between jobs, homes and community facilities

Neighbourhood Planning Processes

What is a neighbourhood planning approach?

A neighbourhood planning approach is about getting the community involved in shaping and guiding development in their area. It means getting involved in workshops, drop-in sessions and meetings, working together to deliver an agreed way forward.



A neighbourhood planning approach is proposed to develop planning policies for the Marton Moss area. These policies would set out how to retain the Moss' distinctive character as well as identifying the type, design, location and mix of new development that the community may decide as being appropriate in the area.

There are two ways of going about developing this local policy framework:

1. by producing a community led **Neighbourhood Plan**
2. as part of a local authority led **Site Allocations and Development Management Document**



If the community decide they do not want to prepare a Neighbourhood Plan, the Council will follow the Site Allocations document approach.

Neighbourhood Planning Processes

Neighbourhood Plan – what this involves

What is a Neighbourhood Plan?

A Neighbourhood Plan is prepared by a community. The plan can set out planning policies for a specific Neighbourhood Area. These policies, for example, can be about the type, design, location and mix of development the community may want in their area.

The policies can be detailed or general, but they have to be in line with the strategic policies of the Core Strategy and also with the National Planning Policy Framework.

To produce a Neighbourhood Plan you have to set up a Neighbourhood Forum in areas where you do not have Parish Councils.

How would Blackpool Council help the community prepare a neighbourhood Plan?

If the community wants to prepare a Neighbourhood Plan for Marton Moss, the plan would be led by the community with the Council providing assistance. This assistance could involve:

- Sharing evidence and information on planning issues
- Helping with consultation events
- Providing advice on assessments and evidence
- Providing advice on whether emerging policies in the Neighbourhood Plan fit with national and core strategy policies
- Helping the community communicate with external partners where required.

What is a Neighbourhood Forum?

In Blackpool, if a community wants to prepare a Neighbourhood Plan for their area, they need to set up a Neighbourhood Forum. This Forum can include residents, businesses and local councillors. As a minimum, the Neighbourhood Forum should:

- be open to those living and working in the Neighbourhood Area
- have a written constitution and
- have at least 21 members.

The local authority has to agree and formally designate the Neighbourhood Forum.



Further information on these processes is provided in the 'Neighbourhood Planning Process' leaflet.

Site Allocations document – what this involves

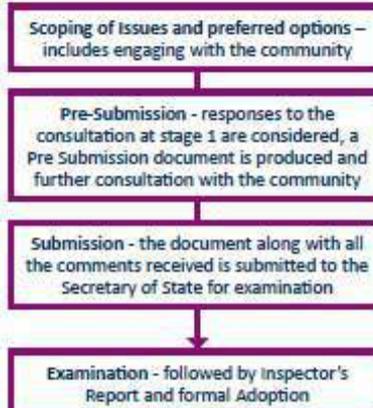
What happens if the community do not want to prepare a Neighbourhood Plan?

If the community do not want to prepare a Neighbourhood Plan for the area, local planning policy will be developed as part of a Site Allocations and Development Management document. This document is produced by the Local Authority engaging with and involving the community through the neighbourhood planning process to get the right policies for the area.



The Process

The keys stages in preparing the Site Allocations and Development Management document are set out below:



Marton Moss Comment Form



Blackpool Core Strategy: Revised Preferred Option – HAVE YOUR SAY!

Marton Moss Consultation

Please complete the form below, if you have any comments about the Core Strategy Revised Preferred Option in relation to the Marton Moss proposals.

Do you have any comments to make on Policy CS27 'Marton Moss' and the supporting text?

Name _____

Address _____

Email Address _____

Please return to:

Post: Development Plans and Projects, PO Box 17, Corporation Street, Blackpool FY1 1LZ

Email: development.plans@blackpool.gov.uk

Online: www.blackpool.gov.uk/corestrategy

For further information, please call 01253 477477

Core Strategy Statement of Consultation

Appendix J – Revised Preferred Option: Consultation Responses

Blackpool Council

Core Strategy Revised Preferred Option

Consultation June-July 2012

Schedule of Representations

Blackpool Council



Chapter 1: Introduction

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
060	Lancashire County Council	Para 1.21: Clarification is required regarding the 'Lancashire City Region'.	The relevant paragraph has been reworded to acknowledge Blackpool and the Fylde Coast area being part of the Lancashire Economic Partnership, which is considered to provide more relevant context.

Chapter 2: A Spatial Portrait of Blackpool

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
Spatial Portrait			
Does the Spatial Portrait accurately describe Blackpool?			
001	Heather & Phil Brown	Yes, the Spatial Portrait accurately describes Blackpool.	Support noted.
002	Mr David Boon	<p>Yes, the Spatial Portrait accurately describes Blackpool.</p> <ul style="list-style-type: none"> - Suggests that Blackpool’s problems stem back from the closure of the Blackpool Central Station in the mid 1960s. - Suggests the demolition of Blackpool North Stations and replacement with an LRT from Poulton into the town. Comments that the South Fylde Line is the more successful line and a new Central Station should be built to bring people right into the town. - The town struggles to attract visitors from within the sub region due to poor road and bus links. - Raises issues with the types of goods sold from the Town Centre 	<p>Improvements to the strategic transport network are vital to support Blackpool’s social and economic well-being, including enhancement of rail gateways, bus services and road improvements. Blackpool North station is the town’s main railway station and is a key arrival point; this will continue with proposals to electrify the line between Blackpool North-Preston-Manchester. However, the station and surrounding area are in need of enhancement, as set out in policies CS5, 18 & 21. The South Fylde line provides an important connection to South Fylde Coast and Preston although the infrastructure would benefit from some upgrading (including a passing loop to increase service efficiency), as set out in policies CS5 & 21. There are no proposals by the Council or Network Rail to reinstate Central Station which closed in the mid 1960s. The site is to be redeveloped as the Leisure Quarter (policy CS19). Regenerating the town centre including improving the retail offer is set out in policies CS16-19 and will be the focus of a Town Centre Strategy.</p>
021	Mrs Ivy Bagot	Yes, the Spatial Portrait accurately describes Blackpool.	Support noted.
035	Judith Mills, Blackpool PCT	Yes, the Spatial Portrait accurately describes Blackpool.	Support noted.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
064	Bourne Leisure	<p>Bourne Leisure notes the references to the historic and current importance of tourism to Blackpool; for example, para 2.11 and the second bullet of para 2.37 refer to the fact that the economy is underpinned by tourism (and the service sector's reliance on the tourism industry). The company also notes that one of the key issues for the area is "<i>three decades of decline in the visitor economy</i>" (para 2.12l) and the following comment:</p> <p><i>"...Despite significant resort investment and upturn in visitor numbers in recent years, Blackpool still has some way to go in overturning three decades of decline in the tourism industry and providing a high quality resort offer which appeals to a 21st Century tourist market and supports a sustainable visitor economy"</i>.</p> <p>In this context, Bourne Leisure considers that the strongest possible and in-principle support should be given in policies throughout the emerging Core Strategy, for the enhancement of existing tourism accommodation and facilities, for example, holiday parks, as well as the development of new high quality tourism accommodation and facilities, in order to assist in as significant a way as possible with the continued revitalisation of the visitor economy.</p>	<p>Core Strategy policy CS20: Leisure and Business Tourism supports the improvement and enhancement of existing tourist attractions as well as proposals for new high quality tourism attractions and visitor accommodation focused on the town centre and resort core in order to achieve sustainable regeneration.</p>
047	Mr David Sherratt, United Utilities	<p>The future management of surface water is essential to improve the quality of Blackpool's beaches and bathing waters, protect the environment, and maintain and attract future visitors to the Blackpool area.</p> <p>Site drainage should be a major consideration for LPAs and developers when selecting possible development sites, ground conditions, local flooding issues, development layout, design and planning policy. The treatment and processing of surface water is not a sustainable solution; the sites current natural discharge solution should be continued and/or mimicked. If the existing</p>	<p>The text in paragraph 2.24 has been amended to include reference to surface water management.</p> <p>Any development in Blackpool will potentially impact on drainage issues and this is dealt with appropriately in policies CS6, CS9 and CS26 (along with Saved Policy NE10)</p> <p>Amendments have been made to the wording of some of these policies and supporting text in line with</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<p>surface water does not have a natural solution, then UU questions the development of a flooded site.</p> <p>Surface water should be managed at source and not transferred, otherwise this will only transfer the issue to another location, generating further problems in that location. Developments must drain on a separate sewerage system, with only foul drainage connected into the foul sewerage network. Every option should be investigated before discharging surface water into a public sewerage network. Connecting surface water to the public sewerage network is not a sustainable solution; LPAs should discourage this practice.</p> <p>Priority options for the management of surface water discharge are:</p> <ul style="list-style-type: none"> ▪ Continue and/or mimic the site’s current natural discharge process ▪ Store for later use ▪ Discharge into infiltration systems located in porous sub soils ▪ Attenuate flows into green engineering solutions e.g. ponds, swales or other open water features for gradual release to a watercourse and/or porous sub soils ▪ Attenuate by storing in tanks or sealed systems for gradual release to a watercourse ▪ Direct discharge to a watercourse ▪ Direct discharge to a surface water sewer ▪ Controlled discharge into the combined sewerage network <i>[this option is a last resort when all other options have been discounted]</i> <p>Development on greenfield sites shall not discharge surface water into the public combined sewerage network and shall not increase the rate of run-off into the public surface water network <i>[this does not replace the priority options for surface water mgt above]</i>. On previously developed land, a reduction of at least 30% will be sought, rising to a minimum of 50% in critical drainage areas <i>[this does not</i></p>	<p>suggested wording from the Environment Agency, and this will strengthen the surface water management issues raised by United Utilities, including natural discharge, SUDS and avoidance of the combined sewer system. Further details will be considered in the Infrastructure Delivery Plan (IDP) and Development Management DPD where appropriate.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<p><i>replace the priority options for surface water mgt above].</i></p> <p>Any discharge to the public sewerage system must be via approved SUDS and will require an approved discharge rate. Consideration should be given for green infrastructure, low carbon, soft engineering SUDS solutions, e.g. ponds, swales, wet land areas and detention basins. http://www.ciria.com/suds/index.html. A discharge to groundwater or watercourse may require the consent of the Environment Agency <i>[To ensure the surface water is properly discharged to prevent flooding or the overloading of the public sewerage network]</i></p>	<p>Reference has been made in ‘Green Infrastructure’ and ‘Water Management’ policies recognising the importance (and support) for the integration and potential retrofitting of SUDS such as ponds, swales and wetlands to address surface water and climate change issues and also add to the Borough’s green infrastructure networks.</p>
053	Pat Francioni on behalf of Talbot PACT Sub-Committee	<p>Questions, with reference to paragraph 2.18, why the Council still allows accommodation to be inhabited which is unsuitable for families and undesirable to anyone who can choose better.</p> <p>Questions, with reference to paragraph 2.22 - in allowing 10% one bed accommodations in new developments, will this increase the proportion of 1 bed flats in the Borough from 37% to 47%? Also asks why not resist all planning applications for one bed flats?</p>	<p>Core Strategy policies aim to improve the quality of new housing (e.g. CS12: Housing Mix, Density & Standards). Existing accommodation exempt from planning controls is monitored by the Council’s Housing Team; this includes enforcing minimum amenity/space standards and rolling out Selective Licensing in the Inner Area to improve the management and condition of existing accommodation.</p> <p>Policy CS12 proposes to rebalance the housing stock by restricting new flat developments and limiting the number of 1 bed units in larger developments to a maximum of 10%. Delivering more 2+ bed units will have the effect of reducing the proportion of 1 bed units and so the 37% figure would then be lower. An assessment of future housing needs justifies the need for further 1 bed units including trends towards smaller household sizes, although the existing oversupply of poor quality units justifies restricting the quantum and improving the quality standards.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
067	Mr Phillip Carter, Environment Agency	Paragraph 2.24: The need for ongoing improvements to the treatment of waste water to improve bathing water quality and achieve the standards required is not only important for environmental reasons. The importance of bathing water quality to the tourism industry and the economic growth and prosperity of Blackpool should be recognised within the Core Strategy.	The text in paragraph 2.24 has been amended to acknowledge this.
068	Ms Laura Feekins, CBRE	<p>Yes, the Spatial Portrait accurately describes Blackpool.</p> <p>Wish to emphasise the importance of the following points and issues that have been identified. Addressing these will be critical to ensuring that Blackpool’s economy is balanced and that the policies will support sustainable development that delivers improvements to the economic, social and environmental conditions in Blackpool:</p> <ol style="list-style-type: none"> 1.Acknowledgement of the significant role that Blackpool continues to play at the heart of the UK tourism and visitor economy; however, there has been a decline in visitor numbers from the 1980s onwards and this needs to be addressed (Para. 2.5). 2.Blackpool has a higher than regional average unemployment rate, and high seasonal unemployment as a consequence of reliance on the tourism industry (Para. 2.12). 3.Whilst there have been recent positive signs of improvement in the visitor economy, there is still some way to go in capitalising on the success achieved to date in order to create a high quality, year round 21st Century tourist attraction, which supports a sustainable visitor economy (Para. 2.14). This issue underpins a need to rebalance Blackpool’s economy, and in particular to provide year round attractions and facilities, including new year round attractions. 4.A Town Centre retail offer that is underperforming and suffers from significant leakage from the Fylde Coast catchment (Para. 	Support noted as well as the emphasis CBRE make to certain points/issues. The proposed policies will ensure the right type of development will occur in the right location to address Blackpool’s key issues and meet future needs.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<p>2.15). There is, therefore, a need to encourage investment in new development that will support higher levels of expenditure retention, in particular through ensuring that there is a high quality complementary tourism and leisure offer; achieving sustainable shopping patterns and behaviour; and encouraging measures to ensure that Blackpool can perform its role as a sub-regional centre.</p> <p>5.The importance of Blackpool’s strategic transport infrastructure and the identification of Squires Gate Lane as a key route into Blackpool from the M55 and wider motorway network (Para 2.31).</p> <p>6.The need to support projects that will result in employment outputs and local training opportunities to address the issues affecting the local economy.</p>	
081	Steven Arnold, DPP (on behalf of Noble Organisation)	<p>No, the Spatial Portrait does not accurately describe Blackpool.</p> <p>Paragraphs 2.5 and 2.12 paint a picture of 3 decades of resort decline. This is not so where owners have continued to invest in existing attractions such as our client’s Coral Island, and this needs to be recognised as a positive by the Revised Preferred Option. Such investment needs to be protected and not undermined by policies and proposals. Our clients support the establishment of facilities which are complementary to the traditional resort offer.</p> <p>With reference to our client’s representations to Figure 2 of the Preferred Option, Figure 5 in the Revised Option identifies the Tower and Pleasure Beach and para 2.23 lists the Tower, Pleasure Beach and Piers. As recognised by the Local Plan Inspector, Coral Island is as important an attractor as a number of these facilities and needs to be recognised as such in the Revised Preferred Option.</p>	<p>The paragraphs provide an accurate overview of Blackpool’s visitor economy although paragraph 2.14 has been amended in recognition that there has also been some private sector investment. It is considered that policies are appropriately worded so new development and investment will not undermine existing attractions including CS19: Leisure Quarter (2b) & CS20: Leisure & Business Tourism (supporting text in paragraph 7.28)</p> <p>Fig. 5 illustrates some of Blackpool’s key landmarks / infrastructure, and has no wider implications. Paragraph 2.23 (Blackpool’s heritage) lists some of the iconic heritage assets with a national profile; it is not appropriate to list all important existing attractions, including Coral Island, here. These are recognised elsewhere, including the leisure policies (CS19 & CS20).</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
Key Issues			
Have we identified all the overarching issues for Blackpool?			
001	Heather & Phil Brown	Yes, this section identifies all the overarching issues for Blackpool.	Comment noted.
002	Mr David Boon	<p>Yes, this section identifies all the issues, however has the following points to make:</p> <p>The cycle paths are not well utilised, bus services and rail links are currently poor.</p> <p>Improvements to the Winter Gardens and putting back central station are key to regenerating the town. Providing high quality eateries in the Winter Gardens along with nightclubs/ bars, a cinema, IMAX and ice rink would provide the focal point needed.</p> <p>Blackpool currently only caters to the low end of the market. Re-building Central station would allow for key retailers including those absent from the town centre alongside it to re-invigorate the town centre. Large-scale slum clearance is needed to instigate the biggest sea change and deliver architect designed homes fit for purpose (low cost-high spec with all the 21st century benefits).</p> <p>A brand new Central station this would allow central Blackpool to become a commuter belt with fast access to Manchester, Liverpool & London. But we can put all the nice houses up we like, it's the residents that need changing.</p>	<p>Comment noted.</p> <p>Transport improvements, re-modelling and enhancement of the Winter Gardens, introducing quality retailers, cafes and restaurants into the town centre, redeveloping the former Central Station site (although this does not involve re-building Central station) and comprehensive redevelopment of key sites introducing quality housing are all supported by various Core Strategy policies.</p>
003	Mr Charles Lea	<p>No, this section does not identify all the overarching issues for Blackpool.</p> <p>Questions how Blackpool going to attract new business and create new jobs. Suggests the need for inward investment and major new</p>	<p>The Core Strategy (including Policy CS3: Economic Development & Employment) identifies the need to support business growth and attract new investment that will provide sustainable jobs in other employment sectors. A Blackpool Local Economy Action Plan identifies</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		companies Systems to invest and create jobs. Recognises that most of Blackpool's jobs are in the service / hotel sector and comments that these are being scaled back with hundreds of job losses.	priorities and activities to grow the local economy and improve employment prospects for local people.
005	Mrs Gillian Wilsden	<p>Yes, this section identifies all the overarching issues for Blackpool.</p> <p>Blackpool already has the main facilities in place, and it is still a relatively new town compared to other areas of the country. We still have green belt, good road and rail connections, air, and even sea connections. As a result, Blackpool is a victim of its own success, and the lure of the bright lights, combined with the desire to live a holiday every day for some, is a very attractive deal. Unfortunately, many people are attracted for the wrong reasons; and they are often the poorer, less educated and younger element, who already have alcohol and drug related problems when they arrive. In order to regenerate these areas, the prospects have to be less attractive to the transient population who have no intention of leading a life within the boundaries of most people's expectations. Without measures in place to discourage the transient population, then families and people with a desire to achieve will never materialise. Many residents who live in rented accommodation are upstanding, hardworking people, but they generally live in properties that are managed in a proper manner. Maybe as each property becomes vacant they could be vetoed to ensure they are fit for human habitation and that each unit provides at least a separate bedroom to the living area, eliminating the studio apartment attraction from the equation. This could be monitored as most of these potential residents would probably need to give an address to claim benefits. A few property landlords in Blackpool are exploiting this situation - it needs to be sorted before it is too late.</p>	<p>Comment noted.</p> <p>Blackpool's issues around transience and the quality of the housing stock are complex.</p> <p>Planning can help to improve the quality and type of new accommodation and how the building looks, as well as control the location of different uses, but it is only part of the solution; tackling these problems requires a multi-disciplinary approach. Planning policies aim to re-balance the housing market by reducing the proportion of 1-bed units and introducing more family-sized dwellings, and driving up the standards of new accommodation to provide a better choice of homes for Blackpool's residents. Planning cannot control the standards of existing accommodation including HMOs, or who manages a property and how well it is run. This is tackled by the Council through Housing Enforcement and a Selective Licensing scheme, which is being rolled out across the Inner Area.</p> <p>In addition, the impact of migration on future housing provision will be considered when updating the housing evidence studies including the Strategic Housing Market Assessment (SHMA) and Housing Technical Paper.</p>
021	Mrs Ivy Bagot	Yes, this section identifies all the overarching issues for Blackpool.	Comment noted.
022	Mrs Rooney	Yes, this section identifies all the overarching issues for Blackpool.	Comment noted.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		The town centre is over crowded and most of the buildings are in a poor state of repair and of poor quality with little open space for recreation. It would be beneficial to demolish most of these properties and replace them with less densely populated developments and more open space and try to include some more expensive properties in order to mix the socio-economic residents. By allowing development in the outskirts of Blackpool, this would help to compensate for the reduced number of houses in the town centre and reduce crime and anti-social behaviour.	In the longer-term, once the town centre becomes a thriving retail, cultural and business destination, this will help to create the demand for high quality residential uses within the town centre. Key sites close to the town centre within the inner area present opportunities for quality housing redevelopment to attract new residents; and around 750 new dwellings are proposed in South Blackpool to help meet future housing needs.
035	Miss Judith Mills, Blackpool PCT	Yes, this section identifies all the overarching issues for Blackpool.	Comment noted.
068	Laura Feekins, CBRE	Yes, this section identifies all the overarching issues for Blackpool.	Comment noted.
069	Ms Heather Lindley, LS Retail	<p>Paragraph 2.37 sets out the overarching issues for Blackpool. It states specifically that Blackpool is the main retail and service centre on the Fylde Coast; however it is underperforming as a sub-regional centre and failing to attract residents who are drawn to competing centres and out-of-centre retail parks.</p> <p>The relative decline in Blackpool's retail provision and standing as a centre has been exacerbated by improvements in competing destinations. The effect of this has manifested itself in a significant level of consumer expenditure leaking out of the Fylde Coast. Preston in particular, has made substantial improvements to its provision over the last decade increasing the quantity, quality and range of its retail floorspace. The retail floorspace in Preston has increased by 55,000sqm between 1990 and 2010 (split as 12,500sqm in centre and 42,500sqm out of centre) Source: Goad.</p> <p>This data demonstrates that investment and enhanced retailer representation secured through new floorspace in out of centre locations can have a positive effect on generating a demand for</p>	<p>Paragraph 2.37 summarises the overarching issues and states specifically that <i>Blackpool Town Centre</i> is the main retail and service centre on the Fylde Coast; however it is underperforming as a sub-regional centre.</p> <p>The Fylde Coast Retail Study identifies where the leakage of Blackpool Town Centre's comparison goods expenditure occurs; Preston City Centre is the most popular destination. There are a number of reasons behind this leakage and why Blackpool Town Centre is under-performing as a sub-regional centre.</p> <p>The Central Lancashire Core Strategy acknowledges the sale of goods traditionally found in town centres (e.g. clothes, footwear and homeware) has recently expanded</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<p>new in centre floorspace. Business models and formats of retail operators have evolved over the last decade and there are now a wider range of goods sold from out of centre locations. The retail warehouse sector has responded to the change in shopping habits, and for centres to continue to be successful, they must adapt and retain flexibility to meet retail requirements. The wider benefits secured within Preston City Centre are a direct result of the increased attraction of the City to a wider population given its holistic retail offer. This includes both in and out of centre retail formats.</p> <p>The Fylde Coast Retail Study demonstrates that the principal issue for Blackpool town centre, in becoming the first choice destination for the Fylde Coast, is the attraction of competing centres, in particular Preston City Centre. The retail parks perform an important role in the overall attraction of the town as a commercial destination. Paragraph 2.37 should be amended to reflect this.</p>	<p>at out of centre retail parks; detrimental to Preston City Centre. To prevent further out of centre development and to protect the future role of Preston City Centre, the Central Lancashire retail policy reinforces the need for main town centre uses to be focussed in the defined town centres.</p> <p>Blackpool’s three out-of-centre retail parks help to retain around 12% of comparison goods expenditure within the Borough. Whilst retail parks provide for a certain type of retailer, the key issues clearly support the focus on the town centre; and therefore it is not considered necessary to amend the text as suggested.</p>
081	Steven Arnold, DPP (on behalf of Noble Organisation)	Yes, this section identifies all the overarching issues for Blackpool.	Comment noted.

Chapter 3: Spatial Vision and Objectives

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
Vision			
Do you agree with the Vision for Blackpool?			
001	Heather and Phil Brown	Agree with the spatial vision in general, however disagree with South Blackpool being the main area for new homes; unless, of course you are referring to an area much further south, such as the old Pontins site?	Housing growth sites within South Blackpool are shown on the Key Diagram and do not include lands outside the Borough such as the Pontins site. The Vision states ' <i>South Blackpool makes an important contribution to rebalancing the housing market...</i> ' it does not propose it as the main area for new homes. Policy CS2 outlines the future distribution of homes across the Borough.
002	Mr David Boon	Disagree with the Spatial vision. The Council needs to decide which people Blackpool is catering for then plan accordingly. The real money to be made is in the family sector (look at the popularity of Centre Parcs); yet Blackpool which claims to be a family resort is empty because families are not catered for. What's here to compete with other family destinations? Nothing. The town needs to do more at Christmas and make more of its 'special' trams. It needs high quality retail; until then this town will only have charity shops, bookies, pound shops, the odd bank & pound shops. Why come here when there's nothing to buy and it's easier to shop on the internet. <i>(Some of the content has been re-worded)</i>	Blackpool is being marketed as a family resort; this is emphasised in the vision of a recently published Destination Management Plan which states ' <i>Blackpool is recognised as the UK's number one coastal resort for families...</i> ' New investment in Blackpool, including key attractions, is aimed at the family market, and work is ongoing to improve the family leisure, retail and cultural offer and drive up quality standards.
003	Mr Charles Lea	Disagree with the Spatial vision. You state that Blackpool offers the visitors a high quality experience. Comments that improvements have been made to the promenade, however some streets behind such as Central Drive and Bond street are in need of improvement.	Blackpool has experienced 3 decades of resort decline so comprehensive improvement will take time. Significant public sector investment has been spent in key areas such as the Promenade and Town Centre to try and draw in visitors and residents and drive subsequent investment. Central Drive is identified as a key resort gateway where proposals for improvement and redevelopment will be supported. Bond Street lies within the South Beach neighbourhood where specific improvement programmes are being identified by the Council and its partners.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		Considers the Spatial vision for Blackpool to be very long term; suggests it needs to more flexible, setting goals and milestones every 2 to 5 years. We have seen a change of government and a change of council and within both of these a change in government policies which affect what you do and say.	The 15 year vision covers the duration of the plan period to 2027. The Council recently issued a ' <i>Mission and Priorities Statement</i> ' and a corporate plan for 2013-15 which both indicate priorities for Blackpool in the short-term; these are broadly in line with the 15 year vision.
005	Mrs Gillian Wilsden	Agree with the Spatial Vision, although on the understanding that my family would be part of that vision, and not used as a medium whereby property prices are marked down so that Guest Houses would eventually be cast aside in the name of regeneration.	Policies will continue to support new & existing businesses providing high quality holiday accommodation. Key sites may present comprehensive redevelopment opportunities, although individuals will be consulted accordingly.
022	Mrs Rooney	Agree with the Spatial Vision.	Support noted.
025	Blackpool Pleasure Beach	Disagree with the Spatial vision. 1st paragraph, 2nd sentence " <i>Blackpool is the <u>principal</u> centre...</i> " The Vision makes reference to the Town Centre and key assets such as the Tower & Winter Garden. It does not reflect the wide diversity of major tourism assets outside the town centre. In particular, it should make specific reference to Blackpool Pleasure Beach, which is one of the most famous visitor attractions in the UK and of national and international significance. Suggest [an additional sentence is included in] the 2nd paragraph as follows: <i><u>Nationally famous attractions in the resort core, such as the Tower, Pleasure Beach and the three piers, will have received significant investment and, alongside new attractions, will be thriving and constantly refreshing Blackpool's visitor offer.</u></i>	Comment accepted; text has been amended. The vision is not just focused on key town centre assets; it makes reference to a high quality visitor experience within the Resort Core... and excellent attractions on the Promenade. Major tourism assets such as the Pleasure Beach are concentrated within the Resort Core / along the Promenade (and this will also be the focus for new attractions) and therefore the current wording does not exclude them from the vision. It is not considered necessary to make specific reference to other resort attractions.
035	Judith Mills, Blackpool PCT	Agree with the Spatial Vision.	Support noted.
061	Diana Richardson, Sainsbury's	Support the vision for Blackpool, especially the aspiration that it will become firmly established as the sub-regional centre for retail, that the town centre will offer a high quality shopping, leisure and entertainment experience, and the creation of sustainable communities having fair access to quality jobs, housing, shopping, health, education, open space, sport and recreation.	Support noted.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
062	Mr Andrew Yuille, CPRE	Agree with the Spatial Vision.	Support noted.
064	Bourne Leisure	<p>Endorse the Spatial Vision. However, given the value of tourism to the economy, it should also refer to Blackpool being the main tourism centre of the Fylde Coast. The text would then reflect Policy W6: Tourism and the Visitor Economy of the North West Regional Plan (2008), which remains as part of the development plan and which promotes the regeneration of Blackpool as an international tourism destination. Even with the proposed revocation of regional strategies, our clients view is that this is an appropriate aim to include reference to in the Local Plan's vision. Suggested text as follows: <i>"In 2027 Blackpool has built upon its status as Britain's favourite seaside resort, <u>and the main tourism centre for the Fylde Coast</u>, to become renowned for the quality and innovation of its culture, entertainment and business tourism offer"</i></p> <p>Accept the need to re-brand Blackpool but consider that the Vision should recognise the importance of tourism per se, the high quality tourism offer supporting the resort core, and the very significant contribution that visitor accommodation and other facilities make to the Borough's tourism profile and the local economy. Suggested text: <i>"The resort core, <u>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"</u></i></p> <p>Support the emphasis in the Vision on a year-round offer.</p>	<p>The vision for Blackpool's status as a renowned tourism destination is more ambitious than sub-regional; it is of national significance. The wording in the Revised Preferred Option has been strengthened to reflect this by stating <i>'Britain's favourite seaside resort'</i>. Therefore, it is not considered necessary to amend the text to include reference to "main tourism centre for the Fylde Coast"; as this is embraced within the national recognition.</p> <p>Whilst the majority of tourism activities are concentrated in the resort core, the Council acknowledges there are also some key attractions beyond this defined area. The wording in the second paragraph of the vision has been amended to state 'resort' as opposed to 'resort core' to embrace the wider tourism offer. This amendment is considered more appropriate than the suggested text.</p> <p>Support noted.</p>
067	Mr Phillip Carter, Environment Agency	The Vision makes no reference to the importance of protecting bathing waters. Would ask that the vision is amended to include the protection and improvement of bathing water quality.	The importance of bathing water quality is recognised elsewhere in the document. It is not considered necessary to include an explicit statement about this in the vision.
068	Laura Feekins, CBRE	Agree with the Spatial Vision.	Support noted.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
070	Mr Mike Hopkins, NS&I	<p>The approach to the Vision is generally supported; however it should be more aspirational rather than recognising the existing situation. In particular, it should recognise the aspiration of the people in Blackpool to have access to decent housing which is affordable.</p> <p>The Vision should identify the need to improve the quality of the built environment and help to improve the perception of the Borough. It should recognise the area is capitalising on its location close to the M55 and its excellent transport links. It should also recognise that the supply of employment and housing sites are constrained by the geography of the Borough. The Fylde Coast SHMA confirms that the availability of relatively cheap, single person accommodation attracts low skill and income immigrants and benefit dependent households which can result in socio-economic problems; in light of this the SHMA recommends that the overall quality is improved by developing attractive family housing and creating a more attractive physical environment. The vision should recognise the need to improve the supply of good quality housing across the Borough and to ensure there is a balanced housing market offer and choice in accordance with the SHMA.</p> <p>The Vision is unsound in that it simply sets out the current picture for Blackpool; it should be more forward looking, setting out what Blackpool will be in 2027. It should set out the aspirations for the Borough, including the creation of neighbourhoods where people choose to live because they offer a wide range of quality housing and an attractive environment. It should set out the aspiration for a sustainable and accessible town; with a growing economy and thriving council. It should also recognise the presumption in favour of sustainable development and seek to significantly boost the supply of housing land, focusing on those authorities who are unable to meet their housing land requirements.</p>	<p>Contrary to this statement, the proposed vision for Blackpool is considered to be aspirational and forward looking to 2027 as opposed to describing the existing situation; this is set out in <i>Chapter 2: A Spatial Portrait of Blackpool</i>, including the complex problems and issues which Blackpool faces.</p> <p>It is considered that appropriate reference is made to:</p> <ul style="list-style-type: none"> ▪ rebalancing the housing stock and providing fair access and improved choice in quality housing within attractive neighbourhoods where people choose to live; ▪ improving the quality of the built environment; ▪ transforming Blackpool (including perceptions); ▪ good accessibility; and ▪ creating a diverse and growing economy; supporting sustainable development; and appropriate housing growth. <p>It is not considered appropriate to acknowledge the presumption in favour of sustainable development in the vision; sustainable development is cross-cutting across each of the strategic objectives and has its own policy.</p> <p>It is not considered appropriate to acknowledge Blackpool’s land constraints in the Vision; this issue is set out elsewhere in the document and evidence base.</p> <p>Capitalising on the excellent transport links in South Blackpool is acknowledged in policy; it is not considered appropriate to acknowledge this in the Vision.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
Objectives			
Do you agree with the objectives?			
001	Heather & Phil Brown	Disagree with the objectives. Provision of gypsy & traveller accommodation is not a good idea unless you wish to add to the social deprivation and crime figures.	Local planning authorities must plan appropriately for the needs of gypsies & travellers and travelling people as required by the National Planning Policy Framework.
002	Mr David Boon	Disagree with the objectives. There needs to be an improvement in holiday accommodation and a reduction in the number of low-end bars and clubs. Blackpool needs to target families. A new Central Station South line needs rebuilding and North station needs closing, with the line converting to Poulton via Layton to the tramway. Redundant land should be used for housing and a new bus garage / tram depot. The tram depot at Squires Gate needs demolishing. We need a park & ride at Whitehills/ Tesco Marton and a LRT along Yeadon Way to serve it. We need a new fleet of buses fit for fare paying passengers and themed trams which appeal to children. A tram museum and heritage LRT should extend to Stanley Park and the Zoo with a loop line built at Stanley Park for the heritage trams. The Winter Gardens should be a 24/7 entertainment venue, with 18 screen cinema, Imax, restaurants, bars, nightclubs and ice rink. A key retailer anchoring the new Central Station is needed e.g. John Lewis. Investment should be targeted in more affluent areas e.g. resurfaced roads, pavements, cuts to council tax, greater police presence. Inner Blackpool needs demolishing and proper designed homes building with new green spaces and play equipment. Selling of alcohol needs to be restricted. <i>[text reworded where appropriate]</i>	<p>Some of the suggestions are supported by the proposed objectives (and subsequent Core Strategy policies) e.g.</p> <ul style="list-style-type: none"> ▪ A high quality visitor offer including new high quality attractions and accommodation (Obj. 14) ▪ Investment in retail, leisure and other town centre uses in Blackpool Town Centre (Obj.15) ▪ Sustainable housing regeneration and new landmark residential development (Obj. 16) ▪ Easier and sustainable journeys within Blackpool... (Obj. 4) ▪ Improve the health and wellbeing of Blackpool's residents and reduce health inequalities in Blackpool's inner areas... (Obj. 11) <p>Other suggestions, including rebuilding the Central Station Line and closing Blackpool North Station are responded to elsewhere in this table. The new Tram Depot at Squires Gate supports the iconic Blackpool-Fleetwood Tramway which provides a valuable mode of transport for the Fylde Coast.</p>
003	Mr Charles Lea	Disagree with the objectives. With the dramatic downturn in the housing market since 2008, no signs of the economy improving and the worst unemployment figures set to continue for the next three years, a better understanding of 'housing needs' needs an urgent review. Don't just build new houses without jobs which may remain empty for years.	Key objectives are to support new housing provision and strengthen the local economy (within Blackpool and the wider sub-region) so that new homes are delivered alongside new jobs. Furthermore, making Blackpool a more attractive place to live will attract new residents who currently work within the Fylde Coast.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
005	Gillian Wilsden	Agree with the objectives.	Support noted.
014	Angelia Hinds	Disagree with the objectives. The aims and aspirations within the policies are all commendable but there are no details of any actions currently being undertaken, or even in the pipeline, to indicate how the Council hope to achieve any of them. As there are several plans mentioned in the report (e.g. Blackpool Local Economy Action Plan, Town Centre Strategy, Green Infrastructure Plan, Energy Efficiency SPD, Surface Water Management Plan, Infrastructure Delivery Plan, Affordable Housing SPD, SHMA update and a Parking Strategy) can we assume that these plans will contain the proposed actions that will be taken by the Council along with neighbouring councils and statutory bodies, along with associated timescales allocated to the actions? As it is the content of these plans, rather than the 'visions' of this report, that will have a direct effect on the residents of the borough, will we be given the opportunity to comment on these?	The aim is to achieve the strategic objectives through the implementation of policies. These policies will be used to determine future development proposals. In some cases, further work is needed to help apply these policies. Where this is the case, this is explained in the policy or supporting text (e.g. the preparation of SPDs or detailed strategies). These may or may not be subject to public consultation, dependent on their status. In particular: <ul style="list-style-type: none"> ▪ All SPDs will be subject to public consultation ▪ The new SHMA and Infrastructure & Delivery Plan will be available for comment at the Core Strategy Proposed Submission consultation stage ▪ The Town Centre Strategy was approved in March '13 following earlier consultation with key stakeholders
021	Mrs Ivy Bagot	Agree with the objectives.	Support noted.
022	Mrs Rooney	Agree with the objectives.	Support noted.
025	Blackpool Pleasure Beach	Disagree with the objectives. Goal 3 (Objective 14) should support the enhancement and expansion of existing attractions as well as encouraging new high quality attractions. The most appropriate strategy to improve Blackpool's tourism economy is to strengthen existing reasons to visit the town alongside developing new reasons.	Objective 14 was reworded in the Revised Preferred Option to 'growing <i>and promoting our tourism... offer <u>including new high quality attractions</u></i> ' - it does not exclude existing attractions which are also seen as important to strengthening the resort appeal (see Policy CS20). Not considered necessary to reword this objective.
035	Judith Mills, Blackpool PCT	Disagree with the objectives (suggested amendments underlined) - Objective 11: <i>...good access to healthcare and encouraging healthier lifestyles through access to open spaces, the coast, countryside, sport and recreation facilities and healthier food. Reducing shops and facilities that contribute to poor health such as excessive numbers of licensed premises and fast food outlets.</i> Objective 21: <i>... community facilities providing healthier lifestyle options e.g. appropriate food stores</i>	Making specific reference to healthy eating measures is not considered necessary in this strategic objective, but the wording has been amended to '<u>including access to...</u> ' so the objective does not exclude these measures and would provide an appropriate hook to subsequent (non-strategic) development management policies if required. This additional detail for Objective 21 is not necessary.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
037	Ruth Paisley, Blackpool & Fylde College	Objective 12: The impact of education and skills on the prosperity and aspiration of the local community could be expanded upon.	Objective 12 has been amended to include reference to improving aspirations.
041	Rose Freeman, Theatres Trust	Support Key Objective 14 which promotes and encourages existing cultural attractions to strengthen the visitor offer.	Support noted.
061	Diana Richardson, Sainsbury's	Support the objectives, but there should be an additional objective which states the Council aims to ensure the delivery of new services and amenities alongside new housing development in order to deliver sustainable communities and minimise the need to travel.	Support noted. Objectives 8 & 21 promote sustainable communities connected to services and amenities so an additional objective is not considered necessary. Objective 21 has been amended to clarify the infrastructure will enable new sustainable development which integrates with its surroundings.
062	Mr Andrew Yuille, CPRE	Disagree with the objectives. The focus on regenerating the inner area of Blackpool before developing green fields is welcomed. Investment in the inner area is much needed for the future growth of Blackpool, to encourage a variety of businesses and balance the housing stock, and creating year round jobs, therefore reducing the need to travel. To achieve this, the objectives need a clearer emphasis on regeneration rather than growth, on maximising the use of brownfield land, strengthening existing centres and protecting the remaining countryside and urban greenspaces.	Support for Core Strategy focus on regeneration noted. As well as maximising regeneration, the Core Strategy focus is on supporting growth to create sustainable housing & employment markets and support the delivery of sites in the inner area i.e. by providing financial assistance. The objectives reflect this dual focus. Policies go on to make particular reference to strengthening existing centres, retaining/enhancing remaining countryside and protecting existing green infrastructure.
064	Bourne Leisure	Objective 14 should be amended to: " <u>...cultural offer, including supporting existing tourism accommodation and facilities both within and outside the resort core, and providing new high quality attractions...</u> " (Suggested amendment underlined). 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 promote new facilities, both within and outside the resort core to help to sustain a high quality visitor offer. The wording of this second spatial objective should therefore be revised as set out above.	See previous response.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
067	Phillip Carter, Environment Agency	Particularly support objectives 5, 6 & 7 (Goal 1) 20 & 21 (Goal 4).	Support noted.
068	Ms Laura Feekins, CBRE	<p>Agree with the objectives. Express particular support for [Objective 14] which places an emphasis on growing high quality and year round visitor attractions, where these have clear economic, social and environmental regeneration benefits. The scope of this objective should be extended to incorporate opportunities that could not otherwise be accommodated within Inner Areas, but which would support Blackpool's wider regeneration objectives in terms of contribution to the tourism offer, job creation, economic growth, environmental improvements, etc.</p> <p>Support the identification of South Blackpool and Blackpool Airport Corridor as an economic growth opportunity area within Goal 4. The area is supported by excellent transport links, including direct access to the M55 and good local public transport connections.</p>	<p>Objectives 14-16 which sit within Goal 3 are specifically about regenerating the town centre, resort core and inner areas to reflect the overarching spatial focus for Blackpool on regeneration (and supporting growth, which is reflected in objectives 17-21 which sit within Goal 4). Objectives 1-13 are applicable across Blackpool and reflect the wider strategy for sustainable regeneration, diversification and growth (Goal 1) and strengthening community wellbeing (Goal 2); these objectives support sustainable investment to strengthen the local economy.</p> <p>Support for Objective 17 noted.</p>
069	Ms Heather Lindley, LS Retail	<p>Support the overall vision and objectives of the Core Strategy, which seek to promote sustainable development and economic growth in accordance with the overarching objectives of the NPPF.</p> <p>Specifically support the objective to enhance the retail provision within the town to support its role as a sub-regional centre and position Blackpool as the first choice shopping destination for Fylde Coast residents. Blackpool Retail Park is considered integral to successfully delivering this objective.</p> <p>Goal 3 should be expanded to include the retail offer of the town as a whole. It should not just be limited to the town centre. The Key Objectives should also include a further point which seeks: <i>"To secure a comprehensive retail offer within Blackpool to meet the needs of the entire community in a local centre, reducing the need to travel and responding to climate change & a low carbon future."</i></p>	<p>Support for overall vision and objectives noted.</p> <p>Support for Objective 15 noted [to clarify, it proposes to make the town centre the first choice shopping destination for Fylde Coast residents].</p> <p>Based on the Key Issues identified in Chapter 2, the town centre is underperforming and needs to be the focus of this objective. It is considered that objectives 8 & 21 sufficiently deal with residents having convenient access to retail services.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
070	Mr Mike Hopkins, NS&I	Disagree with the objectives. The goals within the objectives should also recognise the presumption in favour of sustainable development and seek to significantly boost the supply of housing land in England, focusing on those authorities who are not able to meet their housing land requirements.	Goal 1 balances the need for sustainable development and growth (including new housing provision) alongside other key issues. The presumption in favour of sustainable development is included as a separate policy as advised by the Planning Inspectorate.
081	Steve Arnold, Noble Organisation	Disagree with the objectives. With reference to the Council's response to representations to Ch3 of the Preferred Option, Objectives 14 and 15 do not refer to the continuing need to sustain the traditional family based leisure offer on which the future prosperity of the resort will, in part, continue to depend.	Whilst Blackpool is being marketed as a family resort (refer to the recently approved Destination Management Plan) which includes the traditional family based leisure offer, the Core Strategy does not look at specific branding; it is inclusive.
Policy NPPF1: Sustainable Development			
002	Mr David Boon	<i>Comment unsuitable for publication</i>	Comment considered - no further response necessary.
003	Mr Charles Lea	There should be an open forum panel for these whereby the Council, the Applicants and Neighbourhoods should air their views and agree a way forward.	<p>The comment is not directly related to the Core Strategy. Consultation on planning applications is carried out in accordance with national consultation regulations and the Council's Statement of Community Involvement. Planning Committee provides the arena for the Council (Planning Committee Members), applicants and affected neighbours to discuss planning applications.</p> <p>Consultation on planning policy documents is also carried out in accordance with national consultation regulations and the Council's Statement of Community Involvement. In order to maximise community engagement, in certain circumstances, the Council will go beyond the statutory minimum requirements which can include drop-in events and presentations at area forums.</p>
022	Mrs Rooney	This seems a fair and sensible policy although I have concerns that policies within neighbourhood plans could be heavily influenced by people adverse to change with a 'not in my back yard' attitude who do not consider the wider benefits of sustainable development on	Comments noted. The Neighbourhood Planning process will encourage communities to think about wider issues in developing a Neighbourhood Plan for their area.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		land which has lain fallow for years. Sometimes people do not consider benefits to the community or economic growth because they want to maintain the status quo for sentimental reasons.	
068	Ms Laura Feekins, CBRE Global Investors	Support Policy NPPF1 and the Council's commitment to taking a positive approach to the consideration of applications that are demonstrably sustainable, where they can be shown to improve the economic, social and environmental conditions in the area.	Support noted.
047	Mr David Sherratt, United Utilities	<p>LPA's should adopt proactive strategy priorities in their Local Plan. This should include strategic policies to deliver:</p> <ul style="list-style-type: none"> ▪ infrastructure for transport, telecoms, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat) ▪ health, security, community/cultural infrastructure and other local facilities ▪ climate change mitigation & adaptation, conservation & enhancement of the natural & historic environment, including landscape <p>Crucially, Local Plans should:</p> <ul style="list-style-type: none"> ▪ plan positively for the development & infrastructure required in the area to meet the objectives, principles & policies of the Framework ▪ be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date ▪ be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations; ▪ indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map ▪ allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate 	<p>This is a generic response received from United Utilities. The Core Strategy is considered to meet all the criteria set out by United Utilities.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<ul style="list-style-type: none"> ▪ identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation ▪ identify land where development would be inappropriate, for instance because of its environmental or historic significance ▪ contain a clear strategy for enhancing the natural, built and historic environment and supporting Nature Improvement Areas where they have been identified 	
053	Pat Francioni, Talbot PACT Meeting Sub-Committee	<p>Reference to NPPF - Para 151: This statement offers more to big business than local opinion and needs firming up.</p> <p>NPPF Para 153: This statement is very vague and leaning more towards helping the developers rather than the community.</p> <p>NPPF Para 157: The co-operation with voluntary and private sector organisations is not happening. It needs to be much broader and more open and proof that you actually listen to outsiders is well overdue.</p> <p>If the expression 'to limit freedom' has any value why are applications to change to HMO's constantly being granted?</p>	<p>These comments refer to the NPPF which was adopted by Central Government in March 2012 following public consultation in 2011. The Core Strategy has to be prepared in line with the policies in the NPPF.</p> <p>The Council has carried out its consultation on the Core Strategy in line with government consultation regulations and the adopted Statement of Community Involvement.</p> <p>Saved Local Plan policy HN5 specifically states 'proposals for the conversion of an existing building into houses in multiple occupation will not be permitted.' As such, no application has been granted to change a property to a HMO. The Council is committed to take enforcement action against unlawful HMOs where it is able to do so.</p>
054	Mr Simon Artiss, Bellway Homes Limited	Support the inclusion of new Policy NPPF1 which is based upon the Planning Inspectorates model policy and reflects passages from NPPF itself. This policy should be the starting point when considering any development proposals in the plan period.	Support noted.
061	Diana Richardson, Sainsburys Supermarkets Ltd	Support the inclusion of Policy NPPF1, as per the PINS model policy, as this reflects the 'golden thread' of the presumption in favour of sustainable development which runs through national policy. It is recommended that every policy in the Core Strategy should reflect this presumption in favour of sustainable development.	Support noted.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
062	Andrew Yuille, CPRE	<p>The inclusion of a generic policy in all Local Plans would appear to militate against the very concept of localism. The Government has laid considerable emphasis on the need to interpret NPPF locally. Suggest the Council includes their own policy on sustainable development, which would be more meaningful in a local context. Suggest the following, which provides better consistency with paras 3.3 and 3.7 in the Preferred Option: <i>Blackpool is planning positively for sustainable development that will enhance the prosperity and quality of life of all of its residents. Development that complies with the policies in this Strategy will be considered sustainable. However, proposals that depart significantly from any of the policies in this strategy will not be considered sustainable. The council will work proactively with applicants and the community jointly to find solutions which mean that proposals can be approved, by being made sustainable, wherever possible. Development that delivers economic, social and environmental objectives jointly and simultaneously in an integrated way will be welcomed in Blackpool.</i></p> <p><i>Development proposals will be expected to demonstrate how they enable all these objectives to be achieved, rather than delivering some at the expense of others. Where conflicts between social, economic and environmental objectives do arise, development proposals should demonstrate:</i></p> <ol style="list-style-type: none"> <i>1. How they have attempted to avoid such conflicts</i> <i>2. How they have minimised any unavoidable adverse impacts</i> <i>3. How they will compensate for any residual negative impacts</i> <i>4. How the benefits of the development outweigh any residual negative impacts</i> <p><i>After following these steps, development that would still have an unacceptable impact on economic, social or environmental assets will not be permitted. Economic, social and environmental objectives will overall be given equal weight.</i></p>	<p>This policy has been prepared in accordance with the Planning Inspectorate requirements. A number of recently adopted DPDs have, at the request of the Inspector, had to include the Sustainable Development model policy. There are therefore no proposed changes to this policy.</p>

Chapter 4: Spatial Strategy

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
Key Diagram			
003	Mr Charles Lea	Questions what criteria was used for the decision for development and growth in Blackpool over the next 15 years. It would appear to concentrate on the resort core. Suggests the need to look at Blackpool as a whole not select one area.	To address Blackpool’s key issues the Core Strategy supports a dual focus on regeneration and supporting growth. Inner Area Regeneration will be concentrated in the town centre, resort core and neighbourhoods within the inner areas. Supporting growth in South Blackpool will be concentrated on a number of key sites suitable for housing or employment growth.
005	Mrs Gillian Wilsden	Figure 10 shows South Shore holiday accommodation as the 'Resort Core', but doesn't state whether this is the replacement for the 'holiday area' as previously displayed. This is still a major concern for properties in the tourism sector, with the value of properties already being reduced and causing problems in attracting new tourism business to the areas concerned.	The Resort Core is not an alternative to the defined holiday accommodation areas; it performs a different role. The Resort Core was previously defined on the 2006 Local Plan Proposals Map and because some of the policies make reference to it, it is now shown on the Key Diagram to provide clarity. The holiday accommodation areas are not shown on the Key Diagram as they are not defined in the Core Strategy.
025	Nick Laister, Blackpool Pleasure Beach	Support the Key Diagram and welcome its identification of the Pleasure Beach, and the inclusion of the Pleasure Beach within the Resort Core and Inner Area Regeneration.	Support noted. The Resort Core and Inner Area remain the same as currently defined on the 2006 Blackpool Local Plan Proposals Map.
064	Bourne Leisure	"South Blackpool Growth & Enhancement Area" appears to include at least part of the Marton Mere Holiday Village (however this is unclear due to the poor quality pdf image available online). Although the village is a significant employer in the Borough, given that the South Blackpool area is focussed on new housing and employment growth, the company objects to the proposed boundary of this proposed growth area including the land in Bourne Leisure's control that forms part of the village. Therefore request the delineation of the Area's boundary is reviewed at the earliest opportunity, in order for it to be revised if necessary, to exclude the holiday village from the area. <i>(See comments on Ch 8)</i>	“South Blackpool Growth & Enhancement” only includes those sites specifically identified on the Key Diagram i.e. Marton Moss Strategic Site, Employment Growth and Housing Growth. It does not include Marton Mere Holiday Village. The dotted line was drawn as an indicative line identifying the broad ‘South Blackpool’ area in relation to the rest of the Borough. As this has caused unintended confusion this line has been removed. The quality of some of the pdf images online was only drawn to our attention at the end of the consultation. We will rectify this in the Pre-Submission.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
068	Ms Laura Feekins, CBRE	Support the objective for growth in South Blackpool, as identified in the Spatial Vision, Key Diagram and Policy CS1, and understand the identification of South Blackpool as an area for employment growth. However, in the current challenging economic climate, and as the owner of a significant underutilised warehouse building, CBRE consider that a creative and pragmatic approach to achieving employment outputs and delivering sustainable economic growth (in line with NPPF) would be appropriate for South Blackpool. In particular, an acknowledgement that mixed use development in key locations and frontages could act as a catalyst for wider economic development in South Blackpool, and would be acceptable where it is demonstrably deliverable and can be shown to complement rather than compete with the wider regeneration objectives on revitalising the [town] centre, seafront and Inner Areas.	The Key Diagram identifies key sites in South Blackpool for either Housing or Employment Growth. Policies CS25: South Blackpool Employment Growth and CS3: Economic Development & Employment support the redevelopment and enhancement of existing employment sites to improve the employment offer. The supporting text to policy CS3 (para 5.36) supports some enabling development in exceptional circumstances to support economic growth. For clarity this has also been included in the supporting text to Policy CS25 to avoid the need to cross-reference.
070	Mr Mike Hopkins, NS&I	Object to identifying the NS&I Site as a location for Employment Growth on the Key Diagram. The Key Diagram should identify the NS&I site as a mixed use site which would enable the delivery of high quality employment premises, facilitated by residential development which would contribute to delivering the strategic aims of the Core Strategy. <i>(Also refer to more detailed comments recorded under Policies CS3 and CS25)</i>	The Council's detailed response on why it is considered appropriate to retain the site's employment designation (as opposed to changing it to a 'mixed-use designation') is set out later in the table under Policy CS3.

Policy CS1: Strategic Location of Development

Policy Comments

003	Charles Lea	Where in Policy CS1 does it say meets the need of Blackpool people? Central Business, Winter Gardens, Leisure quarter. None of these will improve the lives of rate payers. Will only benefit the occasional holiday maker.	The Core Strategy balances the needs of residents and visitors. Focusing future growth, development and investment in the town centre and inner area neighbourhoods would benefit residents, in terms of better retail, culture, jobs, housing, community facilities, transport and quality of environment. Supporting growth in South Blackpool would also provide residents with improved choice in quality housing and jobs.
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Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
005	Mrs Gillian Wilsden	The Resort Core provides an amiable solution to the 'holiday area' zone.	The Resort Core contains the majority of the resort's tourism offer; it performs a different role to the holiday accommodation areas, which are more tightly defined around key clusters of hotels and guest houses (the majority of which are located in the Resort Core) where guest houses cannot change to residential use.
057	Closelink Ltd	Policy CS1 should give greater weight to the necessity to integrate development at the end of the M55, especially at Whyndyke Farm, with the existing urban area. Although the majority of this site is in the Borough of Fylde it is essential that the Core Strategy recognises the strategic importance of this development in order to ensure that future development is mutually beneficial to both Boroughs.	Policy CS1 outlines the dual focus of the Core Strategy on regeneration and supporting growth in South Blackpool; with detailed policies on the latter set out in Chapter 8. This includes co-operation between neighbouring authorities, managing infrastructure issues and connectivity / integration with the existing urban area. Working with neighbouring authorities including Fylde BC in delivering key development sites in South Blackpool e.g. Whyndyke is also part of the Duty to Co-operate.
062	Mr Andrew Yuille, CPRE	Support the overall thrust of this policy. However, the final bullet point should 'protect, and where appropriate enhance' rather than 'recognise' the important character of remaining lands at Marton Moss. This would ensure compliance with a number of NPPF core planning principles. It would also better meet the need to achieve economic, environmental and social gains jointly & simultaneously, and improve internal consistency (which recognises that the Borough is highly urbanised with limited green infrastructure).	The Core Strategy is read as a whole. Policy CS1 outlines the overall spatial focus, while more detail of the Council's policy approach to Marton Moss is contained within Policy CS27: Marton Moss. For this reason, the current wording and detail in Policy CS1 is considered appropriate.
070	Mr Mike Hopkins, NS&I	Support Policy CS1 in respect of South Blackpool in principle, which is recognised as a sustainable location with opportunities for new jobs and housing, which will assist in rebalancing the local community and local housing market. However, the NS&I site should be identified as a mixed use employment and residential site, rather than an "Employment Growth" site. A mixed use designation of the site would ensure the effective management of the release of land to ensure there is a five year rolling provision of high quality, unconstrained land that is readily available for	Support for supporting growth in South Blackpool noted. The NS&I site is one of Blackpool's main employment sites. It is well located in relation to the strategic road network with good access to Junction 4 of the M55. The 2013 Employment Land Review (published 2014) supports its retention as safeguarded employment land over the Plan period, particularly given Blackpool's limited employment land supply and shortage of future development land. This study also considers

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		residential and also assist in bringing forward a high quality B1 employment site, which is well serviced by infrastructure. Policy CS1 should recognise that there is a need to redevelop poorly performing sites for mixed uses, which will include higher value end uses such as residential, to facilitate the provision of high quality employment premises required and attract business and investors.	opportunities to redevelop the site to support its long-term future for employment. Accordingly, the supporting text to Policy CS3: Economic Development & Employment does acknowledge that some enabling development will be considered in exceptional circumstances, where justified, to facilitate new employment development.
Supporting Text Comments			
001	Heather and Phil Brown	If there are more bed spaces than visitor numbers why are new hotels being approved in the Talbot Gateway area - surely this will increase bed spaces much further (Para 4.6)	The key issue is quality. The Core Strategy supports a reduction in poor quality holiday accommodation (with an oversupply of around 14,000 bedspaces); but high quality accommodation continues to be an integral part of the tourism offer and will continue to be supported.
003	Mr Charles Lea	Question the need for 3000 - 5000+ homes between Heyhouses, the Moss and M55. Where are all the jobs and is there a real need for these at all? You can build houses, but you can't build land - when it's gone it's gone. A better understanding of housing stock that is available within both Fylde and Blackpool should be undertaken.	The Revised Preferred Option proposed 4,500 new homes in Blackpool from 2012 - 2027 supported by evidence of need available at that time (2008-based ONS projections). This included 750 new homes in South Blackpool along with employment growth. More up-to-date evidence in the 2013 SHMA (published Feb '14) has informed the housing figure in the Proposed Submission. The SHMA also assessed housing stock. Land on the Fylde/Blackpool boundary at J4 of the M55 is proposed for housing and employment growth as part of the Duty-to-Cooperate.
022	Mrs K Rooney	It would be possible to allow development on Marton Moss without losing its semi rural character by permitting quality homes on infill sites where most of the land is fallow or semi derelict. This would enhance the area and not constitute large-scale development. Neighbourhood planning policies could have an adverse effect on this type of development because some people are averse to change and do not see sustained development as the way forward or as a means of supporting economic growth. The Moss as a thriving agricultural district disappeared nearly 3 decades ago and as most of the old market gardens are closed it is time for a change (Para 4.9).	From the majority of representations received, there is general support for a neighbourhood planning approach on lands at Marton Moss. Therefore, it would be for the community in that area to decide on what development would come forward.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
057	Closetlink Ltd	The supporting text to CS1 should provide explanation of the relationship to the area at the end of the M55, most notably the development at Whyndyke Farm.	The supporting text is appropriately detailed given this is an overarching policy which outlines the dual focus of the Core Strategy on regeneration and supporting growth. More detail on supporting growth in South Blackpool, including reference to Whyndyke, is set out in Chapter 8. Developing land on the Fylde/Blackpool boundary around J4 of the M55 forms part of the 'Duty-to-Cooperate'.
064	Bourne Leisure	Policy CS1 seeks to focus future growth, development and enhancement on Inner City Regeneration, including the Resort Core. The supporting text in para 4.7 states "the Resort Core must be a focus for future tourism and leisure development and investment" in order to "support a sustainable visitor economy". As previously stated, the company considers that the policies should recognise the importance of the tourism offer outside the Resort Core.	The Core Strategy focus on investment/development in the Resort Core is justified, as this is where regeneration and positive change is most needed and it is a sustainable location for visitors to access. The policies are to be read as a whole; Policy CS20: Leisure & Business Tourism (1.c.) gives recognition to the importance of existing tourist attractions (both within and outside the Resort Core).
077	Fylde Borough Council	Fylde BC would prefer the wording in Paragraph 4.9 to be amended to read: <i>'In wider strategic terms, Blackpool Council and Fylde Borough Council are co-operating over the future development of working together to agree the strategic priorities for lands on the Blackpool/Fylde southern boundary to deliver a sustainable extension to the Blackpool urban area with a view to attracting major new economic development to help strengthen the Fylde Coast economy'</i> . This would reflect the agreed wording in the emerging Fylde Coast MOU.	Officers from Blackpool and Fylde Borough Councils discussed Fylde's response at a meeting held in October 2012. The text has been amended to align with the wording in the Duty to Co-operate Memorandum of Understanding and the emerging Fylde Core Strategy document.
081	Steve Arnold, Noble Organisation	Para 4.6 needs to mention Coral Island as one of the primary tourist attractions in the town centre. It should be emphasised that development should complement and integrate with existing attractions and not undermine them. Para 4.7 mentions decades of decline: the plan ought to recognise that this is not universally true where investment has been made in existing facilities.	The supporting text is appropriately detailed given this is an overarching policy. The Tower and Winter Gardens are iconic heritage assets; it is unnecessary to make specific reference to other attractions. Policy CS20 is the key tourism policy and this emphasises the importance of existing attractions. Paragraph 4.7 provides a general picture of the resort, which is accurate.

Chapter 5: Core Policies

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
Policy CS2: Housing Provision			
Policy Comments			
002	Mr David Boon	<i>Contains offensive/inappropriate content unsuitable for publication</i>	Comment considered - no further response necessary.
003	Charles Lea	You state there is a housing need for an additional 4,500 houses from now until 2027. What are your figures based on? Have the Council looked at the present housing stock available; what percentage of these available would reduce the proposed total? Where does this housing stock requirement figure come from? Is this just a wish list from developers or has there been a proper consultation between needs & probable's should we build or wait and see what happens.	The proposed housing figure in the Revised Preferred Option was based on evidence available at the time and justified in the Housing Technical Paper (May 2012). The availability of existing stock is a housing supply issue and has no impact on the overall housing figure. The Council has received funding to bring empty properties back into use. The supporting text to policy CS2 specifically identifies this source within the windfall supply.
005	Mrs Gillian Wilsden	Regenerating derelict buildings is already improving the ambiance of South Shore. My only concern is that some properties that are receiving a makeover belong to affluent property landlords who can well afford to do this work themselves. In five years time these properties will deteriorate again because these people are only interested in making money, and these are the same people who are still buying up run-down properties in abundance.	Support for regeneration focus and conversion allowance noted.
022	Mrs Rooney	The need for quality new development is apparent and should allow for further development in Marton Moss without spoiling its semi rural nature and could enhance the environment where there are derelict market gardens and fallow land.	A range of options have been considered for the future of Marton Moss. The focus for remaining lands at the Moss is a neighbourhood planning approach, which would support the retention and enhancement of the distinctive Moss character, whilst identifying in what circumstances development, including residential, may be acceptable.
034	Mr David Short, The Emerson Group	The housing figure should sufficiently provide for the needs of the Borough and its residents, based on the latest available projections. The 2008 household projections will shortly be replaced by the 2010 projections and it would be surprising if they did not show an increase, as the 2010 population projections show an increase of over 1 million nationally above the 2008 figure, which equates to	The proposed housing figure in the Revised Preferred Option was based on evidence available at the time and justified in the Housing Technical Paper (May 2012). Since then, more recent projections have become available and are reflected in a new (2013) Fylde Coast SHMA which contains an up-to-date assessment of need. The SHMA

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<p>around 50,000 households. Therefore there will be some impact on households that will need to be accommodated within Blackpool.</p> <p>No indication of whether account has been taken of the need to assess and discuss with neighbouring LAs the strategic planning needs of the region and how they might be accommodated. Central Lancashire has an adopted Core Strategy so it is unlikely that any excess requirements can be absorbed there. Both Wyre and Fylde intend to reduce their housing requirements. There is a need to adequately consider the strategic planning needs of the sub-region through discussion with its neighbours; and it may be premature to conclude that a housing requirement of 300 per year is appropriate.</p> <p>The 2008 SHMA needs updating to conform to NPPF. Not meeting assessed need for affordable housing, and with the constrained figure proposed, will fail to do so in the future by at least 50%. Need to objectively assess the housing requirement based on an up-to-date study and then do what it can to meet the need. The NPPF expects Council's to make every effort to accommodate their own objectively assessed needs before concluding that constraints are so insuperable that it would be unrealistic to accommodate that need. The Government does attach importance to LPAs taking responsibility for and preparing plans that address their own needs.</p> <p>Reduced delivery rate over past few years is not an acceptable basis for arguing that lower rates are appropriate. Levels may have been depressed for a combination of factors, including weakness of the housing market. "Planning for Growth" expects LPAs to assist higher rates of delivery than might have been achieved previously. Also need to factor in under provision arising from a lower housing completion rate over the past few years.</p>	<p>findings are considered in the updated Technical Paper which justifies the figure in the Proposed Submission. Policy CS2 has been updated to reflect this new evidence.</p> <p>The 2013 SHMA (published Feb '14) considers the sub-regional housing market area and includes an updated assessment of need for each Fylde Coast authority. Each authority is subsequently developing an approach to meeting their housing need; while ongoing collaboration between the three Fylde Coast authorities and Lancashire County Council through the Duty to Co-operate will ensure the strategic needs of the sub-region are also being met appropriately.</p> <p>The 2013 SHMA is compliant with the NPPF and aligns with the Draft NPPG. It provides an up-to-date assessment of affordable housing need for the borough, which informs the recommended overall assessment of need to ensure affordability issues are not exacerbated. This evidence is considered in the updated Technical Paper when justifying the housing figure in the Proposed Submission policy.</p> <p>Historic completions reflect market delivery and these have been considered in the updated Technical Paper to inform the selection of an appropriate housing figure. Blackpool's housing completions since 2003 are detailed in the Housing Monitoring Report (latest one published 2013). The issue of backlog and shortfall is considered in the 2013 SHMA and the updated Technical Paper.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
054	Mr Simon Artiss, Bellway Homes	<p>Revised target of 4,500 new homes (300pa) is a significant (44%) reduction over RSS target of 8,000 (444pa) for 2003-2021 period. Policy CS2 includes 1,100 dwellings with an extant consent; suspect the scale of reduction cannot be accounted by the 'pipeline' supply in the period 2003-2012. Appreciate the spatial portrait in terms of residential development opportunities, but equally NPPF seek to increase the delivery of new homes (including the 5/20% buffer); therefore such a reduction appears contrary to NPPF. Need to justify the position against NPPF requirements (Section 6/ paras 158-159) to demonstrate the Core Strategy is sound.</p> <p>Re. Duty to Co-operate - If you seek a reduction in your housing target due to specific constraints (which need to be made clear), one solution is to work alongside neighbouring LAs including Fylde in order to meet the identified need for new homes in this area. We support the planned expansion of Blackpool within Fylde as a way of meeting Blackpool's housing needs, but question whether such developments meet Fylde's own housing needs, which are in a different housing market area (as per each of your SHMAs).</p> <p>1,750 dwellings from SHLAA sites (urban and regeneration sites) is on the high side in terms of delivery. The conversion and windfall allowance of 1,500 is also generous. Together, these account for 3,250 (72% of total target). Serious doubts as to how robust the delivery strategy is/how sounds Policy CS2 is. Would support urban extensions into Fylde to assist meeting your delivery strategy.</p> <p>Phasing - a lower target of 260pa in your first 5 year period is contrary to the 5/20% buffer required under NPPF (brought forward from later in the plan period). It also highlights the delivery issues on committed and pipeline sites and supports (under Policy NPPF1) a pro-active and positive approach to urban extensions.</p>	<p>When the Revised Preferred Option was published, RSS was in the process of being abolished, so the proposed housing figure was based on evidence of need available at the time including 2008-based ONS projections. Policy CS2: Housing Provision identifies sources of future housing supply; specific sites are identified in the SHLAA (the 2013 SHLAA update will be published to coincide with consultation on the Proposed Submission). The supporting text to Policy CS2 acknowledges the need for an appropriate buffer to accord with NPPF.</p> <p>The updated Technical Paper justifies the housing figure in the Proposed Submission Policy and shows that Blackpool is able to meet its own housing need. Ongoing collaboration with neighbouring authorities through the Duty to Co-operate will ensure the needs of the sub-regional housing market area (identified in the 2013 Fylde Coast SHMA published in February 2014) are being met.</p> <p>Whilst the Viability Study (February 2014) found that a number of SHLAA sites may be unviable, it supports their inclusion within the future supply in order to achieve the Plan objectives for regeneration and also in recognition that the Council is helping to facilitate delivery of these sites where possible. In recognition of the challenges to delivery, the SHLAA identifies a buffer of sites beyond what is required over the plan period to achieve the future housing target (as well as the five year supply buffer required by NPPF). The issue of housing delivery is dealt with in the updated Technical Paper, including justifying a windfall allowance and a phased approach.</p>

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057	Closetlink Ltd	To accord with NPPF, as a minimum the housing requirement should be increased by 5%. However, given the degree of under provision which has taken place in recent years, it can be argued that the requirement should be increased by 20%. Furthermore, the results of the most recent census indicate a further shift upwards in the population and there should be provision for a further review of the figures to take account of this.	The buffer does not increase the requirement but is a flexibility allowance to be added onto the five year supply. The supporting text in the Proposed Submission acknowledges the need to apply an appropriate buffer to accord with NPPF. The 2013 SHLAA update and updated Technical Paper include this buffer in demonstrating a five year supply.
061	Diana Richardson, Sainsbury's	In all locations identified for residential growth in Policy CS2, an acknowledgment should be made that these areas may require additional service and amenities of a suitable scale (including retail), in order to meet the needs of local residents.	This is addressed in other Core Strategy policies e.g. CS4: Retail & Other Town Centre Uses, CS5: Connectivity, CS14: Health & Education, CS11: Sustainable Neighbourhoods and CS28: South Blackpool Transport & Connectivity.
062	Mr Andrew Yuille, CPRE	<p>Broadly support this policy. Total provision and general distribution appear sustainable, appropriate to the Vision and well-related to the evidence. However, given the lack of green infrastructure, high population density/concentrations of deprivation, and need to improve the quality of the built & natural environment, building on Greenfield sites within the urban area should be a last resort. Policy should limit permission to those applications which can clearly demonstrate that no other sites could accommodate the proposal. This relates to Policy CS6, which states that any loss of green infrastructure will only be acceptable in exceptional circumstances.</p> <p>Numbers quoted for 'existing urban area' sites do not add up, and suggest that Greenfield sites will not be needed. The assumption is that only around 70% of dwellings in the SHLAA will come forward. The 2011 SHLAA identifies 2,000 dwellings, so 1,400 are assumed to come forward, not just the 1,250 identified in the policy. These potential new dwellings are listed as sites with planning permission (500 dwellings), greenfield sites (170 dwellings) and a range of other vacant, underused sites and some industrial / commercial use sites (980 dwellings) - which gives 1,650, not 1,250 or 1,400. The SHLAA does not explain these apparent anomalies as it does not</p>	<p>Broad support noted. In accordance with the Core Strategy approach to maximising regeneration, whilst also recognising the need to identify viable sites, the approach to developing Greenfield sites is focused on supporting growth in South Blackpool and on sites within the urban area where this would not conflict with policy. In recognition that Blackpool has limited open space and is largely built up to its boundaries, Policy CS6 provides appropriate protection of existing green infrastructure.</p> <p>Sites in the existing urban area, including those with permission, are identified in the SHLAA. In recognition of the challenges to delivery, the SHLAA identifies a reasonable buffer of sites (c30%) beyond what is required over the plan period to ensure an adequate supply will come forward. In effect, only around 70% of identified sites in the SHLAA would be needed to deliver the 1,250 homes from this source. To identify a sufficient land supply, it is necessary to identify some Greenfield sites in the SHLAA (either committed developments or which do not conflict with policy), although the majority of supply</p>

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		<p>categorise sites as the policy does. But either figure for potential new dwellings (1,400 or 1,650) suggests that all or most of the 170 potential dwellings on Greenfield sites will not be required.</p> <p>Should be an explicit brownfield target (not less than 85%).</p> <p>Bringing empty homes back into use can play a significant role in delivering urban renaissance and meeting housing requirements. Suggest the inclusion of policy to this effect, e.g. <i>The Council will adopt a systematic approach based on recognised best practice to reduce the number of long term empty homes in the Borough. We will work with empty homeowners, to support and encourage voluntary action, but committing to take appropriate enforcement action where reasonable negotiations fail. Emphasis will be placed on developing appropriate, low cost solutions which are effective in bringing empty homes back into use and help meet our broader strategic objectives such as reducing energy demand. Proposals which bring empty homes back into use will be supported in principle</i></p>	<p>(around 60% of all dwellings from identified sources) is identified on previously developed land to support the regeneration focus. Including windfall supply, this figure increases to 70% (rounded). Further information is in the SHLAA and the updated Technical Paper. The supporting text to Policy CS2 has been reworded to provide clarity on the sources of supply, including the buffer of sites. A specific Brownfield target is not considered necessary.</p> <p>The Council has recently received funding to help bring empty properties back into use. The supporting text to policy CS2 now specifically identifies this source within the windfall supply.</p>
065	Cllr Douglas Green	<p>Blackpool is one of the most built up Boroughs in the country. We cannot get rid of any more green spaces in the town as we are built up to our boundaries.</p> <p>Which green sites have been added to the schedule for development; and where are they? Where are the existing brownfield sites for redevelopment?</p>	<p>The Spatial Portrait identifies the Borough as intensely urban and compact, largely built up to its boundaries, with limited open space. There is a need to balance the requirement for new development whilst protecting valued landscapes, biodiversity and green infrastructure. This is reflected in a number of policies including CS2: Housing, CS6: Green Infrastructure & CS27: Marton Moss.</p> <p>Specific sites are identified in the SHLAA (available to view at www.blackpool.gov.uk/corestrategy). In order to identify a sufficient supply, it is necessary to include some Greenfield sites (either committed developments or which do not conflict with policy) within the existing urban area and at South Blackpool, although the majority</p>

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		<p>Are any of the town's large numbers of poor residential houses going to be redeveloped (apart from the tower blocks)? Who is going to finance the building of the new properties?</p>	<p>of supply is identified on previously developed land (around 60% of identified sites, or 70% including windfall sites) to support the Core Strategy regeneration focus.</p> <p>In addition to Rigby Road & Queens Park redevelopment schemes, there are selective housing intervention programmes to improve the social housing stock, funded from a number of sources including the Homes and Communities Agency. Funding is also available to bring empty properties back into use. Applying the SPD standards to new residential conversions will help to improve the quality of private sector accommodation.</p>
067	Mr Phillip Carter, Environment Agency	<p>As stated in our letter (25th Nov 2010) reducing housing numbers from 444 to 300pa could have a beneficial impact on surface water management and quality, but the actual impacts on growth need to be identified. Understand the impacts & solutions are being worked on through the Surface Water Management Plan with United Utilities. The Infrastructure Delivery Plan (IDP) will also be produced in advance of the Pre-Submission. Appropriate recommendations and solutions identified, in addition to those in the Water Cycle Strategy, should be reflected in the Pre Submission policies.</p>	<p>The Council is liaising with the Environment Agency and United Utilities on a regular basis to ensure the Plan appropriately addresses water management issues. The Infrastructure Delivery Plan will be published at the Proposed Submission stage, and has considered the findings of the Water Cycle Study (2010) and the emerging Surface Water Management Plan. These documents have informed the Proposed Submission policies as appropriate.</p>
070	Mr Mike Hopkins (NS&I)	<p><u>Overview of Future Housing Requirement:</u> The housing provision figures are unsound, on the basis that the level of housing proposed falls short of providing sufficient housing to meet identified needs. <i>Further info: The Core Strategy will result in a shortfall in housing provision; likely to give rise to associated problems of overcrowding, substandard accommodation, social exclusion, homelessness and out migration of younger people and families. Developing the NS&I site represents an opportunity to help address these issues whilst improving the quality of life for residents / delivering improvements in the quality of the built, common, natural & historic environment. The Core Strategy does not make adequate provision for the supply</i></p>	<p>The proposed housing figure in the Revised Preferred Option was based on evidence available at the time and justified in the Housing Technical Paper (May 2012). Since then, a 2013 Fylde Coast SHMA has been produced which updates evidence of housing need and demand across the sub-regional housing market area. This considers latest projections and Census data. The SHMA findings are considered in the updated Technical Paper, which justifies the proposed figure in the Proposed Submission. Policy CS2 has been amended to reflect this new evidence. Policy CS2 identifies sources of future housing supply</p>

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		<p><i>of housing to meet the needs of present/future generations. The development of a mixed use scheme on the NS&I site including residential would contribute to delivering the strategic aims of the Core Strategy; in particular new housing would help to support strong, vibrant & healthy communities by providing much needed family housing that will make an important contribution to meeting the needs of present/future generations. Residential development would create a high quality built environment at a location that is highly accessible to a range of local services and facilities.</i></p> <p><u>2008 ONS Figures:</u> The figures are based upon 2008 ONS household projection forecasts. The 2010 forecasts will be issued later this year, which the Council acknowledge (in the Housing Technical Paper) are likely to be significantly higher than the 2008 figures. Consider the housing land supply requirements set out in Policy CS2 are unsound and should be reviewed.</p> <p><i>Further info: The NPPF requires local planning authorities to set their own objectively assessed requirements for new homes, using up to date evidence to ensure that their local plan meets the need for market and affordable housing in their housing market area, including the identification of sites which are key to the delivery of housing strategy over the planned period. Updated household projection figures will be released shortly. An examination of the 2010 based population figures indicate that the population in Blackpool will increase by 12,000 over the period 2010 to 2035 i.e. 480 people per annum. This increase is significantly higher than the 2008 based projected increase of 4,900 over the period 2008 to 2033. Given the updated population projections we do not consider the proposed requirement for 300 dwellings will be sufficient to meet the needs of the Borough. Therefore there should be recognition that the housing land supply figures are subject to review when the new household projection figures are released.</i></p>	<p>while the SHLAA identifies specific sites which, along with a windfall allowance, provide a sufficient supply against Blackpool’s objectively assessed need. Since the Revised Preferred Option was published, there have been discussions between the Council and landowner on the future of the NS&I site and these are reflected in recent evidence base publications, including the 2013 SHLAA update and 2013 Employment Land Review.</p> <p>As stated above, the 2013 Fylde Coast SHMA updates the evidence on housing need and demand for the Fylde Coast sub-region. This considers latest projections and Census data available. The SHMA is a key evidence base document considered in the updated Technical Paper to justify the housing figure in the Proposed Submission policy. Policy CS2 in the Proposed Submission is based on a figure supported by the 2013 Fylde Coast SHMA which reflects the latest evidence on need, as well as other relevant evidence including delivery.</p>

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		<p><u>Under Delivery:</u> NPPF states that authorities with a track record of persistent under-delivery of housing should plan for 20% on top of their 5 year supply. The Council has failed to meet its statutory housing targets since 2003; and the need to include an additional 20% should be recognised and included in the figures.</p> <p><i>Further Info: NWRSS remains the Statutory Development Plan for Blackpool. The Governments intention to revoke the document is a material consideration; however, it is more up to date than the Local Plan. RSS increased the requirements between 2003 -2021 to 8,000 dwellings for Blackpool, representing a significant increase. Blackpool has failed to meet its annual housing delivery targets since 2003, providing an average of only 270 dwellings pa over the last 8 years. Failure to meet these requirements during a period of strong economic activity in the mid 2000s reflects a situation that there has been a limited supply of good quality housing land. The 2008 ONS household projections are a robust basis on which to plan new housing provision, however, the Core Strategy should acknowledge the additional 20% on top of the 5 year figure, on the basis of the poor track record against the statutory target.</i></p> <p><u>Land Supply:</u> There is a shortage of housing supply against the target; and unable to demonstrate an up-to-date 5 year supply of land to meet annual requirements. Even with the revised housing figure of 300 dwellings per annum, there has been a shortfall over the last 5 years. The level of housing proposed, based on the supporting evidence base is unsound and will fall short of providing sufficient housing to achieve a five year housing land supply.</p> <p><i>Further Info: the 2011 SHLAA identifies capacity for 1,725 dwellings over 5 years to 2016. In the medium/longer term, it identifies a potential capacity of 1,524 dwellings that could potentially be delivered to 2027. In considering the details of the SHLAA and how the capacity has been calculated, there are a number of sites which</i></p>	<p>The supporting text to Policy CS2 in the Proposed Submission acknowledges the need for an appropriate buffer to accord with NPPF. The 2013 SHLAA update and updated Technical Paper include this buffer in demonstrating a five year supply.</p> <p>The 2013 SHLAA update and updated Technical Paper identify that the Council is able to demonstrate a 5year supply of deliverable sites against Blackpool’s objectively assessed housing need. This supply includes justification of a windfall allowance. As commented above, an appropriate buffer is also provided, as required by NPPF.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<p><i>have been included where there is uncertainty over the availability:</i></p> <ul style="list-style-type: none"> ▪ <i>Foxhall Regeneration Site (400 dwellings) - understand there are funding and contamination issues with the site and the later phases dependent on demolition of existing properties. Delivering 400 dwellings within the next 5 years on this site is doubtful.</i> ▪ <i>Former Devonshire Road Hospital (118 units) - understand there are contamination issues and site not currently marketed. Also its release is likely to be dependent on implementing a new medical facility at Whyndyke. 118 units in the next 5 years is doubtful.</i> ▪ <i>Marton Moss site (900 dwellings) - Given the Marton Moss site has now been dropped by the Council, there will be a significant shortfall in the medium term supply of housing.</i> ▪ <i>Talbot Gateway site (200 dwellings) - aware that the foodstore and Council offices have been implemented; however, the delivery of residential development is uncertain in the short / medium term.</i> <p><u>Windfall:</u> No compelling case demonstrated that a conversion/ windfall allowance of 250 dwellings should be included (an allowance based on historic supply is not “compelling evidence”). Windfall not considered a reliable source of supply for the Borough. Policy CS2 seeks to apply the Windfall/ Conversion allowance over the whole of the 15 year period rather than 5 years as required by NPPF. Approach to windfall sites contrary to NPPF and unsound.</p> <p>Windfall allowance for seafront regeneration sites: Sites which the Council considers fall within this category would be identified in the SHLAA process. These developments are unlikely to be conversions, will be subject to planning permissions and are very likely to be identified within the SHLAA process.</p>	<p>In relation to the specific sites referred to, the Foxhall Regeneration site (Rigby Road) has planning permission for 410 dwellings with site remediation works ongoing and an agreed delivery programme in place; the former Devonshire Road Hospital is surplus public sector land leased to the Council for 5years, after which time it is expected to come forward for housing; the latest SHLAA confirms sufficient sites are identified against Blackpool’s assessed need without the need to identify additional land at Marton Moss other than land already committed for development; and the Talbot Gateway site has outline planning permission for residential development which is expected to come forward in the medium/long term on the back of significant town centre investment.</p> <p>Justification of including a windfall allowance primarily for conversions (supported by historic delivery rates, funding programmes, future supply from change of use of holiday accommodation etc) is set out in the Housing Technical Paper and is considered to be consistent with the NPPF requirements.</p> <p>In line with the Core Strategy approach to promoting a quality seafront residential offer, a number of Promenade sites are expected to come forward for redevelopment or conversion which cannot be readily identified. Therefore, it is considered more appropriate to include this supply within the general windfall allowance.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
076	Keith Gleeson	<p>The Revised Preferred Option seeks to replace the previous policy documentation in respect of Marton Moss in relation to the supply of housing in the Borough. It appears to abandon the thread of progressively releasing sections of land on the Moss either side of Progress Way and replaces it with an intention to allow housing at a lower rate of provision on no Moss land whatsoever. Intrinsic in the new proposal is the intent to redevelop within inner Blackpool as well as locate a good proportion of new housing at Whitehills. On this basis the proposal is potentially flawed.</p> <p>Redevelopment in the inner areas: Now acceptable housing density rates will effectively require the purchase of more properties than can be provided. Without local or national government subsidy support, none of which is currently or foreseeably available, it is unrealistic to expect private individual or developer investment. The introduction of the New Homes from Old Places policies has seen a massive reduction in applications for house conversions due to a basic flaw in the allocation of space standards and hence financial viability. It appears therefore that the new core strategy intentions will suffer from the same lack of action on the part of investors and involve a further shortfall in the delivery of housing.</p>	<p>When the Revised Preferred Option was published, evidence of land supply demonstrated that additional land at Marton Moss other than land already committed for development was not required to meet the proposed housing figure of 4,500 dwellings over the plan period. The 2013 SHLAA update shows that this remains the case against the housing figure in the Proposed Submission (which is justified in the 2014 Technical Paper, based on up-dated evidence of need as well as other evidence including realistic rates of delivery). Therefore, there is no need to strategically allocate remaining lands on the Moss to meet Blackpool's housing requirement. Policy CS27 does not propose any housing development on the remaining lands of the Moss unless this emerges through the proposed neighbourhood planning approach.</p> <p>Whilst the Viability Study (February 2014) found that a number of SHLAA sites may be unviable, it supports their inclusion within the future supply in order to achieve the Plan objectives for regeneration and also in recognition that the Council is helping to facilitate delivery of these sites where possible. In recognition of the challenges to delivery, the SHLAA identifies a buffer of sites beyond what is required over the plan period to achieve the future housing target (as well as the 5year supply buffer required by NPPF). In terms of conversions, the Study found these to be generally viable and this is supported by recent delivery rates, which show that conversions have continued to come forward at a similar rate during the economic downturn. Costs associated with achieving the minimum conversion standards were incorporated into the viability appraisal, which did not raise any</p>

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		<p>Whitehills is effectively proposing a satellite settlement that is too distant from the local services and infrastructure to comply with sustainability criteria. It indicates a good clear example of urban sprawl that is contrary to the base criteria of good planning practice. It would allow the implementation of a set of criteria to the underlying aims of policies that are in place to protect the base character of the Moss.</p> <p>Although the previous government targets have been abolished, the SHLAA assessment at that time required a rate of 444p.a. to cope with market trends and requirements. Evidence to suggest this demand has reduced is unclear and potentially incorrect on a localised basis, yet the new CS intends for the adoption rate of 300 per annum. Such policy would therefore continue to fail to meet demand by 144 dwellings per annum or 2160 dwellings over the 15 year plan period. This is in addition to the existing shortfall figures.</p>	<p>concern. Further information on the housing delivery strategy can be found in the 2014 Technical Paper.</p> <p>Whitehills lies outside the Borough boundary and so any future development here will be determined by Fylde BC. It sits within a wider area of South Blackpool identified as being important for sub-regional growth, and forms part of the Duty to Co-operate between Blackpool, Fylde and Wyre BCs and Lancashire County Council. Development in this area is considered sustainable and will assist in supporting various housing and economic objectives. Local facilities will be required as appropriate to underpin any proposal including education and health.</p> <p>When the Revised Preferred Option was published, RSS was in the process of being abolished, so the proposed housing figure was based on evidence of need available at the time and justified in the Technical Paper (2012). The 2013 Fylde Coast SHMA provides updated evidence of housing need / demand for the sub-region; and the findings are considered in the updated Technical Paper which justifies the housing figure in the Proposed Submission (it also deals with the issue of backlog).</p>
Supporting Text Comments			
003	Charles Lea	<p>You state there is a real need to build quality housing; this may be true but not on the scale proposed. At present there are hundreds of planning applications for new build homes granted in Blackpool, but as yet none have been built. Why? Could it be the recession, job loses, nobody lending money? Yet you still grant planning permission. Should you grant permission for these proposed 4,500 homes they will remain empty for years and the extra revenue from rates will not be forthcoming.</p>	<p>In planning for new homes the Council must assess the full housing needs for the area to identify the scale and mix of housing that the local population is likely to need over the plan period. The proposed figure of 4,500 dwellings was based on evidence available at the time including future household projections. Sites with extant and lapsed permissions for housing are identified as potential sites in the SHLAA as appropriate.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
005	Mrs Gillian Wilsden	Blackpool is not an industrial town and is based mainly on tourism. In order to encourage the intended middle class population that is portrayed in the Vision, there has to be some form of attraction in the form employment prospects or else the problems will multiply. <i>Linked to Policy CS3: Economic Development & Employment</i>	The Core Strategy focus to support employment growth in sustainable employment sectors and up skill existing residents aligns with the approach to provide improved choice and quality of housing to meet the needs of a more economically active population.
053	Pat Francioni	Para 5.13 (4 th bullet) states: " <i>An allowance for conversions, reflecting the large amount of such developments in Blackpool as a consequence of declining guest house areas</i> ". This grant scheme is not common knowledge and is hopefully open to all except, perhaps, those wanting to make one bedroom flats.	There is misunderstanding in the term 'allowance for conversions'. It is not referring to a financial allowance/ grant; it is about including a figure for conversions towards meeting Blackpool's future housing requirement. Clarification has been provided.
062	Mr Andrew Yuille, CPRE	Support allowing residents in Marton Moss to develop their own planning policy [para 5.18], which reflects the core planning principle from the NPPF to empower local people to shape their surroundings. However, as the only semi-rural area of Blackpool remaining, there is also a clear need for its character and landscape to be explicitly protected by policy - see our comments on CS1. This area plays a key role in the Vision's aspiration to maintain a network of quality green open spaces, coast and countryside.	Support for neighbourhood planning approach in the Marton Moss area noted. Policy CS1 outlines the overall spatial focus; more detail of the Council's strategic policy approach to the Moss area is contained in Policy CS27. For this reason, the current wording and detail in Policy CS1 is considered appropriate.
043	Wyre Borough Council	Given the sub-regional nature of the Fylde Coast housing market, the 2008 SHMA update and the duty to co-operate, it is prudent for Fylde, Blackpool & Wyre Councils to discuss how the housing needs of the sub-region are to be met strategically across the 3 local authority areas. This will help ensure that sub-regional housing needs are met collectively through local housing requirements and avoid a situation where individual or neighbouring authorities face pressure to make additional housing provision in their area, in order to address any unmet needs from outside their own area. The projected household growth figure of 6,000 by 2027 outlined in paragraph 2.6 and the projected additional dwellings figure of 4,500 by 2027 outlined in paragraph 5.9 are difficult to correlate and consequently require further clarification.	Strategic housing issues for the Fylde Coast Sub-Region are identified in the Duty-to-Co-operate Memorandum of Understanding and are subject to ongoing collaboration between the three Fylde Coast authorities and Lancashire County Council through the Duty to Co-operate. This will ensure the housing needs and demands of the sub-region (evidenced in the 2013 Fylde Coast SHMA) are considered and addressed as appropriate. The 2008-based ONS projections showed 6,000 new households in Blackpool from 2008 - 2028 (300pa) which equates to 4,500 dwellings over the 15year plan period. The figures in the Proposed Submission reflect the latest projections in the 2013 SHMA evidence.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
Policy CS3: Economic Development and Employment			
Policy Comments			
002	Mr David Boon	<i>Contains offensive/ inappropriate content unsuitable for publication</i>	Comment considered; no further response necessary.
057	Closelink Ltd	Policy CS3 should take account of the fact that certain employment sites are no longer likely to be used for employment purposes in the future. In such circumstances, when the site has been marketed and is in a suitable location for alternative forms of development, different land uses should be considered on their merits in order to avoid land remaining vacant and therefore inhibiting regeneration.	Safeguarding employment land within Blackpool's main employment areas over the plan period is supported by the evidence base - namely the Employment Land Review (ELR) - particularly given Blackpool's limited employment land supply, tightly constrained boundary and shortage of future development land. Where sites present redevelopment opportunities, the supporting text to Policy CS3 acknowledges enabling development will be considered in exceptional circumstances, where justified, to safeguard employment use in the long-term.
061	Diana Richardson, Sainsburys	<p>Policy CS3 states that the land currently safeguarded for employment uses is viable and suitable. Suggest this is re-worded to acknowledge that this is subject to change as a result of changing market conditions and demand. This re- wording would bring the policy in line with the NPPF (para 22) which states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.</p> <p>Recommend that the policy text or justification should be elaborated to explicitly acknowledge the role of retail as an employment generating use, as a use that can enable wider developments and achieve plan objectives and can perform as a buffer between traditional employment and residential areas to help overcome issues that could impact residential amenity.</p>	<p>The supporting text to Policy CS3 acknowledges some enabling development will be considered in exceptional circumstances on a small number of sites where justified to facilitate opportunities for employment development. This flexibility allows the policy to respond to changes in the market and provide viable solutions in accordance with NPPF. No changes are considered necessary.</p> <p>The current reference to enabling development in the supporting text is considered to be appropriately worded, without the need to make specific reference to retail. Any enabling development, including retail, would need to demonstrate how it conforms with the relevant Core Strategy objectives and policies.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
068	Laura Feekins, CBRE	<p>Support the aspiration of Policy CS3, which advocates development that will deliver employment opportunities where jobs will be accessible. As an investor committed to progressing development in Blackpool, CBRE is pleased to note that Policy CS3 supports proposals that will result in new investment in Blackpool.</p> <p>CBRE recognise that there are investment opportunities e.g. Squires Gate which can act as a catalyst for investment in the wider South Blackpool area in line with the Core Strategy vision. This is particularly important at Squires Gate, which is a substantial site with significant frontage onto Squires Gate Lane (strategic approach routes into Blackpool). CBRE welcome para 5.36, which recognises that in order to facilitate regeneration and expansion of substantial vacant and underused space on Squires Gate, redevelopment opportunities which introduce mixed use development may be considered. This should be reflected in the wording of Policy CS3.</p>	<p>Support for Policy CS3 noted.</p> <p>Para 5.36 in the Revised Preferred Option supports the sentiments of Policy CS3 (1.a.) and contains sufficient detail to explain how it should be applied. It is not considered necessary for this wording to sit within the Policy. Reference to enabling development in the supporting text has been amended in the Proposed Submission to help provide further clarity.</p>
070	Mr Mike Hopkins, NS&I	<p><u>Context:</u> The current site at Mythop Road opened around 1978 and is one of three UK centres which provide back office processing for NS&I. The site is now much larger than needed and no longer provides a satisfactory working environment. The buildings are inefficient and expensive to run with a high risk of a major failure.</p> <p>The site is currently allocated for employment in the Local Plan and has been marketed in the past by DTZ and more recently by Blackpool Bay Area Co and DTZ. The marketing campaign has been comprehensive, carried out over a sustained period of time and has promoted the accommodation on favourable and flexible terms. It has not however, produced the required results (with only 1 inspection from an interested party).</p> <p>In light of the above, NS&I consider that redevelopment of the surplus land and existing complex represents the best opportunity</p>	<p>Comment noted. The Council has been working with NS&I to consider future development opportunities in response to their future operational needs whilst ensuring the site remains in long term employment use.</p> <p>The Council understands the marketing campaign was undertaken for a 9 month period in 2008. The landowner would need to provide evidence that a robust marketing exercise has been undertaken, particularly in the current economic climate, to support future development proposals on the site.</p> <p>The NS&I site was assessed in terms of its quality and contribution to the local economy in the 2013 ELR (published in 2014 and superseded previous studies)</p>

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		<p>for securing modern employment use on the site. However, this would not be viable without achieving higher value uses on a significant part of site. Given the site constraints and surrounding land uses we do not consider that it would be appropriate to retain all of the land on the site for employment use.</p> <p>NS&I is seeking to ensure the Core Strategy is amended to provide flexibility for alternative higher value uses, such as residential uses on part of the site where these are required to facilitate new employment uses on the site. It is considered the site is suitable for development, which could incorporate a new facility for NS&I, a mix of uses incorporating B1 office employment generating uses. It will be important to consider potential interest from development falling outside the employment uses classes; the location of the site means it would be attractive for a mix of uses, including residential. The combination of residential together with high quality employment development would be appropriate, given the sites location, its availability and suitability for redevelopment.</p> <p><u>Employment Potential of the Site:</u> JLL has assessed the potential of the existing site for employment use, by considering the current market in terms of supply, demand and values, the qualitative aspects of the existing buildings, the current access arrangements, proximity to residential accommodation and the site's prominence.</p> <p>Potential for B2/B8 Uses: unlikely to be market interest for wholesale reuse or redevelopment of the complex. Developers / occupiers would be deterred; the reasons for this include:</p> <ul style="list-style-type: none"> ▪ Difficulties arising from inappropriate vehicle movements i.e. the introduction of HGV's into an established residential community. ▪ The site is unlikely to be attractive to B8 logistics operators due to the site's distance to other major conurbations and its ability 	<p>along with Blackpool's other main employment areas. The ELR supports the retention of all main employment areas over the plan period, including this site, in the context of the Borough's limited employment land supply, tightly constrained boundary and shortage of future development land.</p> <p>The supporting text to Policy CS3 acknowledges that to facilitate redevelopment, some enabling development (including housing) will be considered in exceptional circumstances on certain sites. This would need to be supported by a robust viability assessment and must not undermine wider plan objectives. Opportunities for new employment uses with some enabling development on the NS&I site are considered in the 2013 ELR, although a full assessment on a future proposal (including scale and type of enabling development) would need to be made as part of a planning application when all information is submitted for consideration.</p> <p>In response to some of the issues raised:</p> <ul style="list-style-type: none"> • The site is capable of direct access from Preston New Road, subject to gaining the necessary planning permission, which would alleviate concerns re. HGV movements and access and provide opportunities for a prestigious site frontage. • It is necessary to provide an appropriate profile of sites

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		<p>to service major towns in the North West. There are far better available sites closer to the M6 corridor, in Chorley & Preston.</p> <ul style="list-style-type: none"> ▪ Restrictions on operational activity due to impact on amenity of adjacent housing & holiday Caravan Park. ▪ More strategically located sites on the M6 Corridor. ▪ Funder’s reluctance to invest in a site that is poorly located and has conflicting neighbourhood land uses. ▪ Significant demolition and site remediation costs would require higher values from alternative land uses to enable employment uses to be developed. ▪ A purchaser would offset the demolition costs against any offer for the site and as such this would have a marked effect upon the viability of employment uses. ▪ Not a financially acceptable level of return for NS&I. ▪ Poor prominence and access. <p>Potential For B1 Office Uses: B1 office space supply is primarily focused on Blackpool Technology Park and Blackpool Business Park where land and buildings are available for development. Further space is available on Whitehills Industrial Estate in Fylde Borough. Based on the volume of existing built office space currently available in the market, combined with the amount of development land available on the above business parks, we do not believe that there is a realistic chance of the NS&I site being brought forward for B1 employment development in the next 15 years, particularly having regard to the historic take up rates over the last 15 years.</p> <p>In our experience the viability of an office development site is determined by a number of factors including the type and form of development; site density; rental level; construction costs; finance and timescale. We have considered the property and its attractiveness to the wider office market and comment as follows:</p>	<p>in this area of the region to support the Blackpool and Fylde Coast Economy.</p> <ul style="list-style-type: none"> • This site provides an excellent location in relation to the strategic highway network, with good access to Junction 4 of the M55 and on a major route into town from the motorway. It is considered one of Blackpool’s better located employment sites, contrary to the assertion that the site is poorly located. • A robust viability assessment would be needed to support the argument that employment uses aren’t viable (and that it is not the level of return expected by HM Treasury that is pushing a higher land value). • Demolition and other costs would need to be evidenced in viability appraisals. <p>Land (and vacant buildings) at the Business Park and Technology Park are available for B1, B2 and B8 uses. Whilst the evidence base analyses vacancies, this figure will not be offset against Blackpool’s overall requirement. Whitehills is outside the Borough and will be considered in Fylde’s Core Strategy, although developing wider land in this area on the Blackpool/Fylde boundary is part of the Duty-to-Cooperate. Future development opportunities on the NS&I site, including new B1 business uses, are considered in the 2013 ELR.</p> <p>In response to some of the issues raised:</p> <ul style="list-style-type: none"> • Opportunities to redevelop the existing office complex with new employment premises which meet modern occupier needs are considered in the 2013 ELR. • Policy DE1 of the current Local Plan identifies the

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<ul style="list-style-type: none"> ▪ The existing property is too large in the context of historic, current and anticipated floorspace requirements in Blackpool. In terms of divisibility, the property does not lend itself readily to split floors for different occupiers. The building specification is poor and is not attractive to the occupational office market. The property’s attraction to occupiers is diminished by an absence of amenities close by, which you would expect from a business park locality; as such the area is not a recognised office location. ▪ A recent search confirms the existence of six available properties which individually comprise in excess of 20,000 sq ft; suggest that this represents a healthy supply of accommodation in the context of historic take-up trends. Moreover, the existing offer within the market comprises a range of accommodation from ‘Grade A’ at Talbot Gateway through to hybrid accommodation on one of the business parks/industrial locations. ▪ An indication of the attractiveness of the property to the wider market place is demonstrated by historic marketing. Based upon the marketing undertaken to date, the site needs to be redeveloped in order to attract occupiers. To ensure the provision of modern employment facilities and to address on-site constraints, higher value end uses will be required on part of the site to assist delivery of the development. In our opinion the securing of employment uses on the site is dependent upon securing improved access directly off Preston New Road, which can only be delivered through the development of high value end uses such as residential. Developers will not invest in sites which are not capable of providing accessible, modern, flexible and efficient workspace. <p><u>Core Strategy Comments:</u> Object to identification of NS&I Site as a location for Employment Growth [on the Key Diagram / Figure 18]</p>	<p>undeveloped land within the site as being appropriate for B1 uses subject to overcoming access and amenity issues. This is reviewed in the 2013 ELR.</p> <ul style="list-style-type: none"> • The evidence base considers the office market within Blackpool as well as recent take-up and occupancy levels across the main employment areas. • As previously stated, the landowner would need to demonstrate that a robust marketing exercise has been undertaken, particularly in the current economic climate, to justify any future proposals involving the loss of employment land. • As previously stated, enabling development to facilitate new employment uses and secure the long term future of the site for employment will be considered where this is robustly justified and would not conflict with wider Core Strategy objectives. <p>As previously stated, the NS&I site is assessed in terms of its quality and contribution to the local economy in the</p>

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		<p>and an Employment Site on Figure 12; and seeking to ensure the Core Strategy is amended to provide flexibility for alternative higher value uses e.g. residential on part of the site where these are required to facilitate the development of new employment uses on the site. There are 3 key issues associated with this namely:</p> <p>(1) Does the NS&I industrial/business location need to be safeguarded; (2) is it in demand / viable for employment use; and (3) is the mechanism for release of such sites adequate? The need for that quantity of land at South Blackpool is also of relevance and the lack of evidence to underpin the boundary of South Blackpool.</p> <p>In response to...</p> <p>(1) The evidence base which underpins the identification of the main industrial /business locations is out of date and unsound. The Council should critically re-examine their employment land portfolio, with input from relevant professional organisations and landowners / developers before identifying any safeguarded employment land. We do not consider that the NS&I site needs to be safeguarded; the proposed higher employment land target (35-40 hectares) which has been used is based on take up rates over the 10 year period 2001-2010. However, past take up rates over a 15 year period (1995-2010) equivalent to the plan period, only indicate average take up rates of 1.94 hectares per year or 29.1hectares over the plan period (excluding 20% flexibility factor). The evidence base also fails to take account of business churn. A range of sites will be needed for the full spectrum of uses and with differing strengths, but the landholding on some of them is considered to be too large or in the wrong location.</p> <p>(2) The marketing overview confirms our view that the NS&I site is underused and unsuitable for modern commercial requirements. Whilst there will be cycles in the economy, if the site was in</p>	<p>2013 ELR (which updates previous studies undertaken), along with Blackpool’s other main employment areas shown on Figure 12. This study supports the retention of all existing allocated employment areas, including the NS&I site, over the Plan period, particularly in the context of Blackpool’s limited employment land supply, tightly constrained boundary and shortage of future development land.</p> <p>The 2013 ELR, which informs the Proposed Submission, updates previous studies on Blackpool’s employment land (namely the 2008 ELR and 2009/2010 ELR updates). In addition, the Employment Technical Paper has also been updated. This updated evidence provides more up-to-date analysis on Blackpool’s existing employment land portfolio, including the amount of land that is considered to be realistically available, historical take-up rates and Blackpool’s future requirement for employment land. It also updates the analysis on how Blackpool will meet its future requirement (taking into account the Borough’s tightly constrained boundary), to reflect the outcome of ongoing collaboration with neighbouring authorities through the Duty to Co-operate.</p> <p>These issues/ constraints are considered in the updated ELR study when assessing the amount of employment land supply realistically available and considering</p>

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		<p>demand then it would be coming forward or showing early signs of activity. The NS&I site is occupied by a large, out-dated office complex (to be demolished). The remainder of the site comprises surplus land, with the exception of the Moorlands Building which will continue to house NS&I operations. The site is not suitable for B2 or B8 uses. It is a good site for office development but the land holding is too large to warrant designation of the whole site for employment. The site can be made more sustainable than the ELR suggests by integrating office employment uses with housing and community facilities, plus improving bus, cycle and footway linkages. This is the most appropriate course of action.</p> <p>The site has been extensively marketed and promoted for employment use over a considerable period of time with only 1 inspection. We consider there is likely to be demand for a small proportion of the existing land area for office uses and even then only if significant enabling development can be provided as part of a comprehensive redevelopment. The aspiration for the site is to create a sustainable neighbourhood that integrates NS&I current and future operations; together with housing and employment, within a well landscaped framework. It is envisaged that 2.5ha (of the 11.9ha) will be occupied by NS&I which will include the existing Moorland Building and land required for future expansion. The total net developable area of the surplus land is approximately 9.5ha of which the residential land could deliver circa 5ha in a phased manner. This would leave circa 4ha for employment uses. By focussing the residential element to the south, access to the town centre by sustainable transport modes is maximised.</p> <p>The Council proposes to carry out an ELR in summer 2012. This should be done in time for the next stage of the plan. Request that NS&I has an opportunity to input into the report.</p>	<p>opportunities for future development on the site. However, as previously stated, the wider site is still considered appropriate to remain identified as one of Blackpool’s main employment locations. Policy CS3 provides flexibility for enabling development if this can be appropriately justified.</p> <p>The need to demonstrate that a robust marketing exercise has been undertaken for the site (in order to justify any future proposal for non-employment uses) is previously stated, particularly given that the lack of interest over the last five years is likely to also be a reflection of the current economic climate. The opportunity for enabling development is considered in the 2014 ELR and would need to be robustly justified.</p> <p>The updated ELR will be published alongside the Core Strategy Proposed Submission, with the opportunity for consultees to comment.</p>

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		<p>(3) Policy CS25 does not allow for mixed uses, and also says sites should be safeguarded. Given that employment land availability has been substantial for a number of years, demand remains low and the portfolio has not altered significantly it may be time to introduce more flexibility. Ideally some sites and allocations would be examined and adjusted now, in the light of a robust evidence base, rather than relying upon a mechanism for later release or piecemeal consideration of individual sites. Notwithstanding the above, there is a strong case for releasing some of the land for alternative uses, other than employment, at NS&I and bringing forward a sustainable mixed use scheme.</p> <p><u>Proposed Changes:</u> Object to the designation of the NS&I site as a location for Economic Growth and Employment. The identified locations for business and industrial uses are out of date and fail to have regard to market demand and are therefore unsound. The target set within the Core Strategy, which underpins Policy CS3 are based upon previous take up rates, however if a more realistic past take up period of 15 years is applied (equivalent to Core Strategy period) the employment land requirement would be reduced by circa 30%. On this basis we consider the target in CS3 is unsound.</p> <p>The NS&I site should not be identified as an Employment Site in Figs 11 & 18. Policy CS3 should be amended to include recognition that employment and mixed use schemes will contribute to the local economy and provide high quality residential accommodation in an established community, which will assist in meeting the Boroughs 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.</p>	<p>The issue of allowing some flexibility on a small number of sites, where robustly justified, to facilitate economic development is addressed above.</p> <p>As these proposed changes are covered in the earlier comments, the Council’s Response to these is already provided above.</p>

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		<p>Policy CS3 should recognise the need to make 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 achieve the maximum benefit in terms of social, economic and environmental gain. Including high value end uses such as housing will assist in delivery of employment premises, overcoming key market constraints such as a new access directly off Preston New Road.</p> <p>The evidence base that underpins the designation is unsound and the Council should re-examine the employment land portfolio and targets for employment land over the planning period. Based upon the past take up rates, the employment land target set within the Core Strategy is unsound. It has been demonstrated through previous marketing of the NS&I site that there is unlikely to be demand for the development of the entire site for high quality modern business facilities. Figures 11 & 18 should identify the NS&I site as a mixed use site which would enable the delivery of high quality employment premises, facilitated by residential development which would contribute to the delivery of the strategic aims of the Core Strategy.</p> <p><i>(also refer to comments recorded under 'CS25')</i></p>	
Supporting Text Comments			
003	Charles Lea	<p>Para 5.27: you state it is important to underpin the tourist economy yet this has been in decline since the 1960s. Visitors do not come to Blackpool for 1 - 2 week holidays anymore; most if not all stay no more than 2 nights. Times have changed, peoples needs have changed, and we cannot go back to the good old days. Visitors do not want boarding houses anymore nor do they want self catering holiday lets. We must change or die as a resort. An opportunity for Blackpool Council came with the closure of the Pontins holiday camp. This would have made a great site for an all-weather, year</p>	<p>Overtuning three decades of decline in the visitor economy and providing a high quality resort offer which appeals to a 21st century market is one of the overarching issues which the Core Strategy aims to address. This includes supporting high quality tourism attractions, a revitalised seafront and town centre, and reducing visitor accommodation. Both the Pontins site and Whitehills estate are outside the Borough boundary and so the Council has no control over the future use of this land.</p>

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		<p>round visitor attraction along the lines of an Eden project. Why is recognising land at Blackpool south the only option? When this green space has gone, it is gone forever. We have seen what happens at Whitehills on the edge of the M55, a large sprawling industrial estate and now the developers and planners want to incorporate houses into their plans. Why? It has been shown from other areas within the U.K this approach does not work.</p> <p>Para 5.44: what is Blackpool Council doing to encourage large businesses to come into Blackpool? You talk about future growth and employment, but if there are no new jobs and business to match these findings, why build? Whitehills has already become an eyesore. There needs to be a more bird's eye view of this metropolis. No consideration has been made to the final layout and how they fit together.</p>	<p>Housing was allowed at Whitehills on appeal. Any future development here will be directly determined by Fylde BC; although as this land forms part of a wider area identified as being important for sub-regional growth, the Council will work with neighbouring authorities including Fylde to agree the strategic priorities for development.</p> <p>The Council is working with BFWEDC, the LEP and neighbouring authorities to identify and deliver economic growth priorities for the Fylde Coast area, including a local Growth Accelerator Strategy, which will identify activities to deliver growth in key sectors identified. The development of land around J4 of the M55, including Whitehills, is a strategic priority and forms part of the Duty to Co-operate, although the Council has no direct influence over land outside the Blackpool boundary.</p>
035	Miss Judith Mills, Blackpool PCT	<p>Para 5.30: add statistical neighbours to the analysis of past employment land take up to learn from their development.</p> <p>Para 5.39: increased office space is an opportunity to provide healthier food options for staff working there.</p>	<p>Past delivery rates / market conditions are unique to each area so this comparison is not considered necessary.</p> <p>Healthy eating measures will be considered in a Health & Wellbeing Strategy which will inform future development management policies as appropriate.</p>
043	Phillipa Clarke, Wyre Borough Council	<p>Acknowledged that an update to the employment land evidence base will be prepared prior to the Proposed Submission. However, it would be helpful if there was more clarity in the supporting text of Policy CS3 and in Policy CS25 on the scale of major employment development envisaged at land close to J4 of the M55.</p> <p>It is recognised that development of the J4 area could create sub-regional employment opportunities and economic growth. Economic development in this area, which is close to Wyre Borough, should be carefully considered to enable infrastructure</p>	<p>Employment growth opportunities in South Blackpool within the Blackpool boundary will be concentrated in existing employment locations, as shown on the Key Diagram. The scale of growth beyond the Blackpool boundary will be identified in the Fylde Core Strategy. This is expected to include opportunities to help meet Blackpool's longer term needs (given the shortage of land in the Borough) in addition to Fylde's future needs.</p> <p>Since this representation was received, land around J4 of</p>

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		<p>limitations in this area to be addressed and ensure that the sub-regionally important site at Hillhouse is not adversely affected. Accessibility of the J4 area is currently poor; a major employment development is likely to generate a number of new trips which could significantly increase traffic flows from Wyre to the J4 area. Given existing congestion on routes such as the A585(T) clarification regarding the scale of development proposed at the J4 area of the M55 is needed to allow for detailed highway modelling of the potential impacts on the local and strategic highway network.</p>	<p>the M55 on the Fylde/Blackpool boundary is identified in the Duty to Co-operate Memorandum of Understanding as being important to attract major new economic development to help strengthen the Fylde Coast economy. The Fylde Coast authorities and LCC are working together to agree the strategic priorities for development in this area, which will include the consideration of suitable infrastructure requirements by working closely with relevant stakeholders.</p>
060	Lancashire County Council (LCC) (Environment Directorate)	<p>Para 5.29 refers to joint working with the Fylde Coast authorities on the delivery of employment development, but should also reference the wider Lancashire sub regional economy in order to strengthen the strategic case for the development priorities set out. The document should also reference the Enterprise Zone at Warton and should signal Blackpool's intention to work positively to deliver the objectives of the EZ.</p> <p>Paras 5.30-33 set out employment land requirements over the plan period and indicate a shortfall in Blackpool (26-31ha). Land in Fylde is identified as potentially helping to meet this need. Fylde BC has yet to publish its evidence base relating to employment land supply and there is therefore a level of uncertainty as to the amount of land required in Fylde and where it should be provided. It will be necessary to ensure that the results of Blackpool's and Fylde's work on employment land adequately reflect the needs of each authority. A joint masterplanning exercise would help.</p>	<p>The supporting text to this Policy has been amended to reflect opportunities to support the Fylde Coast economy as well as the wider Lancashire Economy. It also acknowledges the need for joint working to deliver the objectives of the Enterprise Zone at BAE Systems, Warton.</p> <p>This issue is being addressed by ongoing collaboration between Blackpool and Fylde Councils in particular as part of the Duty to Co-operate. The Fylde Core Strategy Preferred Option published in 2013 acknowledges the need to identify sufficient land to help meet Blackpool's future requirements in addition to the requirements of Fylde.</p>
062	Andrew Yuille, CPRE	<p>Para 5.32: Currently Blackpool has approx. 23.5ha of remaining land available on existing employment sites, however only 9ha of this are considered attractive sites which are suitable, available and developable. Para 5.36 does touch on how Blackpool hopes to create more attractive sites on the remaining 14.5ha to improve occupancy, however, what is actually going to be done to make</p>	<p>Para 5.36 allows enabling development in exceptional circumstances on existing sites that are under-occupied to strengthen the employment offer; this will help to improve the viability of sites, making them more attractive to develop. Securing inward investment and relocation opportunities (para 5.44) will help to introduce</p>

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		<p>these sites more attractive is not elaborated. It is vital to increase the occupancy to ensure the regeneration objectives are met. The NPPF supports and promotes the effective use of land by reusing land that has previously been developed reducing the need to build and grow in to new areas. This should be made explicit in policy.</p> <p>Para 5.41: Accept that lands at South Blackpool are a sustainable location for sub-regional economic growth. However, would like clarity in the policy that this refers solely to the adjoining Blackpool Business Park and within nearby older existing employment estates.</p> <p>Focusing new employment development on land close to Blackpool airport and J4 of the M55 is likely to promote the use of cars and aviation, which would conflict with the need to reduce carbon emissions and the need to travel, especially by car. It is also likely to increase levels of congestion. Improvements in accessibility by more sustainable modes to these outer sites will need to be introduced alongside new development, as well as travel planning.</p> <p>The policy should clarify that all new employment development will involve the regeneration and re-use of existing land (i.e. be 100% brownfield).</p>	<p>new employment uses on these regenerated sites. It is not considered the policy focus (to safeguard existing employment land and enhance sites with new development which would improve the employment offer) needs to be made more explicit.</p> <p>The South Blackpool policy focus refers to lands close to Blackpool Airport (Blackpool Business Park and older estates including Squires Gate and Sycamore) and around Junction 4 of the M55 on the Blackpool/Fylde boundary.</p> <p>Given the scale of development proposed in South Blackpool, Policy CS28 identifies measures to ensure this will be sustainable and integrate with the wider area, encouraging sustainable connections.</p> <p>The supporting text acknowledges that new employment development in the Borough will come forward on existing employment land - through redevelopment opportunities or on remaining available land (some of which are Greenfield sites). The policy has been amended to provide further clarity.</p>
077	Fylde Borough Council	<p>Para 5.33: <i>'the Borough's tight knit boundary and demonstrable lack of future development land means opportunities for further employment expansion elsewhere within Blackpool are extremely limited. Blackpool's longer term development needs are therefore integrally linked with the wider employment market area and rely on substantial areas of land immediately on the edge of Blackpool in neighbouring Fylde, which would complement and support Blackpool's economic growth'</i>. There is a lack of up to date evidence to support this statement. The paragraph goes on to say that further work on employment land evidence will be undertaken over</p>	<p>The text has been amended so that it is consistent with the Duty to Co-operate Memorandum of Understanding and the Fylde Core Strategy Preferred Option document.</p> <p>Ongoing collaboration between Blackpool and Fylde officers has enabled each authority to provide an update on the findings of their employment land studies and the implications on Core Strategy policies / strategic priorities and sub-regional land requirements.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<p>the summer, including an update on the availability of existing employment land. The outcome of that review will be presented in the Pre-Submission Document. Fylde BC would wish to be kept informed of progress on that review before it is included in the Pre-Submission document. Fylde has commissioned an up to date Employment Land Study and it is essential that strategic priorities identified within the two studies are coordinated if our respective Local Plans are to be found sound at examination.</p> <p>The Fylde Sub Region Employment Land Review Summary Statement 2010 states: <i>'Blackpool's needs are integrally linked with the wider employment market area. Most specifically, there are substantial areas of land immediately on the edge of Blackpool in neighbouring Fylde, both close to the Airport and the M55 junction, which help complement and support Blackpool's economic growth.'</i> Fylde BC would prefer the wording in Policy CS3 to more closely mirror the wording in the Sub Region Employment Land Review.</p>	

Policy CS4: Retail and Other Town Centre Uses

Policy Comments

005	Mrs Gillian Wilsden	Blackpool town centre is now a far more pleasant experience for the shopper, with the Winter Gardens and the Tower having a huge makeover, and also the Hounds Hill. Visitors used to complain the town centre was empty but now we are receiving positive feedback.	Comment noted.
025	Nick Laister, RPS (on behalf of Blackpool Pleasure Beach)	<p>Support policies aimed at strengthening Blackpool's town centre, by focusing major new retail development in that location.</p> <p>Policy CS4(1c) should make it clear that this presumption against further out-of-centre retail development does not include tourism-related retail development, such as that which exists at the Pleasure Beach, and will not prevent the Pleasure Beach in future consolidating existing retail development within the park and along</p>	<p>Support noted.</p> <p>In planning terms there are no distinctions between the different types of retail including what RPS define as 'tourism related retail'. Any planning application will be assessed on its own merits. Depending on the type of development, it could be considered ancillary to the</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<p>Ocean Boulevard. Suggest that part (9c) of this policy states that tourism-related retail development will be acceptable within the Resort Core.</p> <p>Policy CS4 (3) could have unintended consequences. The NPPF defines tourism development as a "town centre use". Policy CS4 (3) proposes strict control over all town centre uses. However, this would have the effect of directing all future tourism development of any sort to the Town Centre and only into other parts of the Resort Core (such as the Pleasure Beach) if there are no more centrally located appropriate sites available for the development and if there is an assessment of its impact on the Town Centre. Blackpool Council should be encouraging tourism development in the Resort Core, not imposing onerous restrictions on it. This policy needs to be clarified. Suggest the following rewording: <i>"3. Proposals for new retail development and other town centre uses (except tourism development) will only be permitted where it can be demonstrated that..."</i></p> <p>It may be appropriate to reinforce in the policy here that tourism development will be acceptable within the resort core.</p>	<p>Pleasure Beach. Any retail development can be appropriately assessed against Core Strategy, NPPF and saved Local Plan policies.</p> <p>The Council is unable to change definitions set out in National Planning Policy. Part 3 of CS4 sets out a criteria based approach to new retail and town centre development in line with the National Planning Policy Framework.</p> <p>Policy CS20 – Leisure and Business Tourism does support new tourism development in the Town Centre <u>and</u> Resort Core.</p> <p>It is not considered appropriate to reword this part of the policy as there is no tested planning definition for 'tourism retail'.</p>
061	Diana Richardson, Sainsburys	<p>Support the centre first approach in Policy CS4 which directs new major retail development to Blackpool Town Centre and that within other centres development will be supported where it is of an acceptable scale, role and function. However, the presumption against further out of centre development is contrary to the NPPF (para 23) which states Local Authorities should allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town</p>	<p>Support noted.</p> <p>This policy was prepared in line with the recommendations from the Fylde Coast Retail Study having taking into account the current fragility of the Town Centre.</p> <p>The policy has been amended accordingly in line with the NPPF. Part 1(c) has been removed.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<p>centre. As such, Sainsburys recommend that this be removed in order for the Policy to be sound.</p> <p>Also suggest that in line with NPPF (para 23) an additional policy be included in the Core Strategy that sets out guidance on how edge and out of centre development proposals will be assessed.</p>	<p>Prior to adopting the Site Allocations & Development Management DPD, out and edge of centre development are appropriately assessed using the criteria set out in policy CS4 of the Core Strategy. There is not considered to be need for separate Core Strategy policy.</p>
062	Mr Andrew Yuille, CPRE	<p>Support this policy, particularly the vision to create a strong core within Blackpool town centre, with the provision of a large range and quality. Preventing further out of town developments will encourage the use of the town centre and it is vital that this policy is not weakened in any way and is rigorously implemented in order to avoid undermining regeneration objectives. With the promotion and revitalisation of the town centre, local businesses and produce should also be promoted and prioritised - strengthening small and independent retailers. NPPF para 23 says that local authorities should 'retain and enhance existing markets and, where appropriate, reintroduce or create new ones, ensuring that markets remain attractive and competitive' and promote the individuality of town centres. This will assist in achieving the vision to achieve a 'strong sense of civic pride'.</p> <p>CPRE have recently published a major national report highlighting the economic, social and environmental benefits of local food webs: http://www.cpre.org.uk/resources/farming-and-food/local-foods/item/2897-from-field-to-fork. Recommendations 5 & 6 should be incorporated. Strengthening local food webs could help to add to the tourism offer, grow the local economy and keep money circulating in the local economy to a greater extent, and tackle high levels of health inequalities. The report also provides evidence (pp 12-13) re. the negative impact that out-of-town development has on town centres. The policy could also actively encourage small and independent retailers to add to the individuality of the town centre</p>	<p>Support noted. The adopted Town Centre Strategy supports the Core Strategy policies and sets out priorities for improvement and management of the Town Centre. The accompanying Action Plan identifies the need to develop a specialist outdoor market and events programme focussed on St John's Square which includes the potential for Farmers Markets.</p> <p>Core Strategy Policy CS16 specifically relates to the Town Centre and highlights the priority to strengthen the retail offer in the Town Centre. This includes supporting both major and independent retailers.</p> <p>It is considered that Recommendation 5 of the report sits outside the Local Plan process.</p> <p>The Core Strategy policies and saved Local Plan broadly support Recommendation 6 of the Report.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<p>and help strengthen local food webs.</p> <p>With congestion already an issue in the town centre, measures will need to be introduced to cope with larger transport numbers due to increased visitor numbers to this retail core. The overall vision is to create a sustainable town where public transport and lower emission alternatives are favoured (e.g. cycling/walking) and concrete measures will be needed to deliver this. There is a need to increase the attractiveness of public transport, walking and cycling in Blackpool and in terms of long-distance journeys to get there.</p>	<p>Core Strategy Revised Preferred Option Policy CS21 deals specifically with arrival and movement through the Town Centre and Resort.</p>
068	<p>Ms Laura Feekins, Drivers Jonas Deloitte on behalf of CBRE Global Investors (Owners of Squires Gate Industrial Estate)</p>	<p>Support Policy CS4, which is in line with the overarching objectives of the Core Strategy (and NPPF) in placing the emphasis on retail and other town centre uses being accommodated in the City Centre. Also support the criteria-based policy approach that will be applied to the consideration of new retail development proposals not in the City Centre.</p> <p>In accordance with the criteria-based approach and NPPF para 23 (which notes that Local Authorities should allocate a range of suitable sites to meet the scale and type of retail, leisure & tourism uses in full), the potential for out-of-centre allocations in the forthcoming Site Allocations DPD should not be precluded where opportunities for such uses may arise, which cannot be met on sites within the City Centre, but which would complement and not compete with it, and which would not conflict with the overall objective of strengthening its role as a sub-regional centre.</p>	<p>Support noted.</p> <p>Comment noted. In preparing its Site Allocations and Development Management DPD, the Council will assess a wide range of sites across the Borough.</p> <p>The text has been amended accordingly in line with the NPPF.</p>
069	<p>Ms Heather Lindley, Savills (on behalf of LS Retail Warehousing Ltd)</p>	<p>Policy CS4 sets out how the Council will aim to safeguard and improve Blackpool's vitality and viability. CS4 (1) (c) states that to strengthen Blackpool town centre, the Council will adopt a: <i>'presumption against further out-of-centre retail development including expansion of Blackpool's existing out-of-centre retail parks and relaxation of conditions.'</i></p>	<p>This policy was prepared in line with the recommendations from the Fylde Coast Retail Study having taking into account the current fragility of the Town centre.</p>

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		<p>The basis of the Planning Act is a presumption that planning permission should be granted unless material considerations indicate otherwise. The presumption against development contained within the draft Policy is contrary to the basic principle of the Planning Act. Furthermore, the NPPF sets out an explicit presumption in favour of sustainable development (para 14). If proposed developments accord with the sequential approach to site selection and do not result in an unacceptable level of impact on a defined centre, they should be approved. These key policy tests to appropriately control development are included within Part (3) of Policy CS4 and therefore Part 1(c) is unnecessary. Part 1(c) as currently drafted reduces the flexibility or scope for development in appropriate locations for business models or operations that cannot locate in the town centre (due to the specific characteristics of the business model or due to existing representation).</p> <p>The Core Planning Principles intended to underpin plan making and decision making make it clear that the NPPF is intended to promote development and economic growth. The NPPF delivers a clear message that the planning system should support the delivery of growth, jobs and homes. This is highlighted in the Ministerial foreword which states <i>'development that is sustainable should go ahead, without delay'</i>. Building a strong, competitive economy is one of the key elements of delivering sustainable development in the NPPF. Para 19 states the Government is committed to securing economic growth to create jobs & Para 20 states: <i>'The Government is committed to ensuring the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage not act as an impediment to sustainable growth.'</i></p> <p>Development proposals in out of centre locations which accord with the sequential approach and do not result in an unacceptable</p>	<p>The policy has been amended accordingly in line with the NPPF. Part 1(c) has been removed.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<p>impact, would support and enhance the overall attraction of Blackpool in accordance with the objective to make it the first choice destination for retail in the Fylde Coast. Such development would also reduce the level of leakage to competing centres and therefore accord with the objectives to secure more sustainable development. We therefore request that Part 1(c) is deleted.</p> <p>The Core Strategy does not accurately reflect the importance of the role that Blackpool Retail Park and other out of centre retail facilities play in supporting the overall attraction of Blackpool town centre and its ability to compete with other centres in the Region.</p>	
069	Ms Heather Lindley, Savills (on behalf of LS Retail Warehousing Ltd)	Request that the presumption against development in out of centre locations at Policy CS4(1)(c) is removed as this is contrary to the presumption in favour of development. The relevant tests in respect of appropriate retail development are contained within Policy CS4(2) and therefore CS4(1)(c) is unnecessary.	This policy was prepared in line with the recommendations from the Fylde Coast Retail Study having taking into account the current fragility of the Town centre. The policy has been amended accordingly in line with the NPPF. Part 1(c) has been removed.
Supporting Text Comments			
002	Mr David Boon	Concern regarding the amount of discount shops and charity shops in the Town Centre.	There is no distinction in use class terms. A1 shops cover a variety of types of shop which includes discount and charity shops. The Council is unable to control these if the building has an existing A1 permission.
003	Mr Charles Lea	Para 5.54 states that a major retail development within the Blackpool Town Centre / Talbot Rd gateway and beyond, how is this going to help rejuvenate that area. Most if not all of Blackpool vision to this area will not alter the decline nor will it bring in any additional income. To invest & spend well in excess of between 600 & 850 million pounds in one area, this will not help other well deserving areas around Blackpool, which is more important to the local residents & ratepayers.	Para 5.54 identifies Blackpool's requirement for additional retail growth over the plan period and highlights a range of schemes that will help meet this requirement. The Talbot Gateway scheme will provide a much needed improvement to this area and will act as a catalyst for town centre regeneration and supporting economic growth. This comment has no implication on the Core Strategy.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
005	Mrs Gillian Wilsden	Waterloo Road area has suffered enormously over the past few years - South Shore used to have an abundance of thriving shops ranging from Woolworths, the Co-operative, Boots, Ethel Austin, Gateway, Talbots etc, but now the retail area is like a ghost town, especially Bond Street and South Shore Market. The experience of walking along Bond Street is not pleasant, and unless measures are taken to improve this area, no new trade will materialise.	The Core Strategy seeks to direct retail development to the town, district and local centres which includes Waterloo Road. A project is currently underway to improve the South Beach area including Waterloo Road and Bond Street.
069	Ms Heather Lindley, LS Retail	<p><u>The Role of Blackpool Retail Park & Other Out of Centre Locations</u></p> <p>To enhance the retail provision within Blackpool and create a more comprehensive offer, it is necessary to provide floorspace that can accommodate different retail formats (not simply replicating the provision at Houndshell or within the wider town centre). To be able to re-establish Blackpool as the natural first choice centre for residents within the Fylde Coast, it is essential to provide development which enhances the retail provision within the town (in terms of the comprehensive range of operators and formats).</p> <p>The principal objective of the developments is to begin to replicate the comprehensive range of retail operators and formats that can be found in competing centres, such as Preston, which will help to reduce the level of expenditure leaking out of the Fylde Coast. Without this important intervention, the town and wider Borough will continue to decline. Whilst LS supports the overarching aims and objectives to improve the town centre by regenerating the Central Business District and the Winter Gardens, it cannot compete with other towns and cities solely by regenerating the town centre. We therefore request an additional policy is added to the Core Strategy, recognising the additional complementary retail facilities (such as Blackpool Retail Park) and the important role that these have in supporting the overall retail offer in the Borough. They are established destinations within the Borough and offer potential for further, sustainable development. Accordingly, the</p>	<p>This policy was prepared in line with the recommendations from the Fylde Coast Retail Study having taking into account the current fragility of the Town centre.</p> <p>The policy has been amended accordingly in line with the NPPF. Part 1(c) has been removed.</p> <p>Out and edge of centre development are appropriately assessed using the criteria set out in policy CS4 of the Core Strategy and the NPPF. There is not considered to be need for separate policy.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<p>Core Strategy should contain policy and reasoned justification that: 1. Identifies the existing retail parks, free-standing retail warehouses and grocery superstores; 2. Sets out criteria based policy that encourages such retail uses to continue in the role and function as complementary to the established retail hierarchy of the defined centres within the Borough; and 3. Adapt within the policy framework the requirements of NPPF that proposals for retail development outside identified centres are supported by assessments on impact and the sequential approach.</p> <p>Para 5.53 reiterates the requirement to restore Blackpool as a strong sub-regional retail centre and this should include reference to the importance of a comprehensive retail offer (both in & out of centre).</p> <p>Support the overall objective to increase the quantum of retail floorspace in Blackpool to meet the needs of the local population and that of the wider Fylde Coast. The Core Strategy quotes the findings of the Fylde Coast Retail Study at paragraph 5.54 and we suggest reference is made to a requirement to update this data at regular intervals to assist with the decision making process.</p> <p>Pargaraph 5.57 states that <i>‘the Fylde Coast Retail Study highlights a priority for a presumption against the future expansion of out of centre faculties or proposals for the relaxation of conditions attached to out of centre facilities to protect the vitality and viability of Blackpool Town Centre’</i> . For the reasons set out above in relation to policy CS4 this should be removed.</p> <p>Figure 13 identifies the Retail Hierarchy within the Borough. Given the importance of retail parks in supporting the retail function of Blackpool and meeting the day to day needs of the local populous, these destinations should also be identified within the hierarchy.</p>	<p>The Core Strategy focus is on new retail development directed to the Town Centre.</p> <p>Reference has now been made that the retail evidence base will be updated periodically and recommendations reviewed.</p> <p>This section of supporting text repeats what is stated in the Fylde Coast Retail Study. This text has been removed and the text amended accordingly.</p> <p>The retail hierarchy identifies all of the town, district and local centres in the Borough. The destinations referred to are classed as ‘out of centre’ and are not relevant to be identified as part of the retail hierarchy.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
Policy CS5: Connectivity			
Policy Comments			
001	Heather and Phil Brown	Suggest a tram link should also be considered to the airport.	Options appraised for the SINTROPER project found that an airport tram link would not be viable. Benefits were identified from options improving the heavy or light rail services at Squires Gate though these rely on constrained funding resources. The Council continues to support and seek investment in the South Fylde Line.
002	Mr David Boon	<p>Suggests that Blackpool North station needs demolishing and the line to Poulton converting to the LRT to run via Layton centre to a new Central station to handle the main trains. The South line should be rebuilt to serve the Central station. The bus network needs speeding up and free travel for the OAPs axing after 3pm until 6.30pm. A new fleet of buses capable of getting fare paying passengers about the routes should be introduced as they are too slow. Suggests that bus travel times can be slower than on foot.</p> <p>Suggests that investment should be prioritised for the South Fylde line rather than the North Fylde line. Suggest that the Central station/south line is the key to regenerating the town.</p>	<p>The Council cannot directly influence the infrastructure investment on the national rail network. Blackpool North provides a valuable service to Blackpool and will continue to do so. Investment to electrify the line and improve other infrastructure will increase capacity between Blackpool North, Preston and Manchester, reduce journey times and enable direct links to London, Birmingham and other routes as they become available.</p> <p>Concessionary Bus Passes enable eligible older people free travel on off-peak local buses anywhere in England over which the Council has no discretion. Blackpool Transport has upgraded the bus fleet and frequently reviews bus routes. Options to increase the capacity of the South Fylde Line and improve connections along the whole Fylde Coast are currently being assessed by the Council with its partners. There are no longer term plans/proposals to reinstate Central Station.</p>
003	Charles Lea	Suggests a joined up approach is required to assess Blackpool transport.	This policy aims to deliver a more sustainable, integrated and efficient transport network to encourage sustainable travel choices and reduce emissions. The Blackpool Local Transport Plan (LTP) and Local Transport Delivery Plan co-ordinate transport strategy and delivery across the

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			borough. The council works within the Fylde Coast Strategic Transport Group and the Lancashire Local Transport Body to ensure transport co-ordination within the borough and the wider region.
005	Mrs Gillian Wilsden	Supports the new trams noting their efficiency and smooth running.	Support for the tramway noted.
025	Nick Laister, Blackpool Pleasure Beach	CS5 f(i) does not mention the need to improve links between the main parking areas in Blackpool and the major attractions. This is important. By way of example, the pedestrian links between the main Central Corridor parking areas at Yeadon Way/Seasiders Way and the South Beach attractions (Pleasure Beach, Sandcastle, South Pier) is very poor, being indirect, unattractive and poorly signed. The improvement of these links should be a key objective of transport policy. We would suggest rewording CS5 f(i) as follows: "Extended and enhanced network of high quality cycle and pedestrian friendly routes connecting employment, facilities and services, connecting the main tourist parking areas with attractions, and connecting Blackpool neighbourhoods with the town centre, promenade, green spaces and adjoining countryside."	CS21 has now been combined with CS5 to provide greater clarity to overall transport policy. Wording from CS21 covers links between car parks and resort attractions, particularly within the town centre and resort core. CS22: explains further in the context of Key Resort Gateways.
033	Diane Clarke, Network Rail	Part (a) of the policy: Network Rail request that where any of these proposals are concerned that we are contacted at the earliest possible stage to review the plans and discuss any potential issue (e.g. asset protection, access, developer contributions).	The Council works in partnership with Network Rail to facilitate improvements to stations and other rail infrastructure where opportunities arise. Wording of policy changed to reflect this.
053	Pat Francioni	Transport systems and roads must be improved and full professional traffic planning be brought in to sort out the shambles that is currently the state of the area. Travelling north-south or vice versa, is a long and wearying process and there are many changes that could improve this. Some cycle lanes are an absolute travesty in the centre of such a large town, such as Reads Avenue and Counce Street and although we support responsible cycling initiatives our current system needs very close attention and alteration, the hire a bike scheme is superb but needs rethinking. Could paragraph 5.74 refer to promoting "responsible" cycling?	The policy seeks to develop a more sustainable, integrated and efficient transport network with greater emphasis on walking and cycling. The cycle hire scheme is currently being reviewed to ensure its sustainability. All transport users are equal in their need to act responsibly and it is inappropriate to single out cyclists over other user groups.

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068	Ms Laura Feekins, CBRE	CBRE consider that improved connectivity is an essential component to attract and support future investment in Blackpool and there should be a particular aspiration within Policy CS5 to connect locations proposed for economic and employment growth back to the City Centre and Resort Core, including the waterfront attractions. This includes Blackpool Airport, the Squires Gate estate and the wider South Blackpool area. CBRE welcome the emphasis placed on improving connectivity on land close to the M55 and Blackpool Airport Corridor in Paragraph 5.65.	Comment and support noted.
Supporting Text Comments			
003	Mr Charles Lea	Within Para 5.65 reference is made to growth in Blackpool South with Land between M55 and Blackpool Airport. Asks why is there any need to use any of this land at all? In today's climate and since 2008 "recession" hit U.K there is no money available to carry out these projects, all that would happen is for the Council to give approval for planning applications (granted) and then remain unbuilt.	There is a need to provide higher quality homes and widen housing choice on the edge of Blackpool. This is covered further in policy CS2 and in the accompanying Housing Technical Paper.
005	Mrs Gillian Wilsden	I agree that access to Fleetwood and St Anne's could be better, and often people looking for a day out of Blackpool comment on the traffic congestion. One particular bus route that would be beneficial in the summer months would be to access the Zoo from South Shore, without people having to travel all over town, or to the hospital to get there.	Support Noted. Bus route 20 connects South Blackpool, Marton and Blackpool Zoo.
035	Miss Judith Mills (Blackpool PCT)	Pg 52 Walking & Cycling in line with NICE Walking & Cycling (consultation draft April 2012) & PH8 NICE guidance distance markers in time units will increase likelihood to travel on foot or cycle. Safer Route markers are also needed.	Supporting text now includes reference to NICE guidance PH8 and PH41. Policy wording changed to reflect direction of guidance.
060	Lancashire County Council Environment Directorate	Agree with para 5.70 that there is a need to improve the main strategic highways network in and around the M55, particularly to improve north-south road links from the M55. There is increasing congestion on the urban north-south corridors and both road	Support Noted.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		access (via the M55) and rail access to Fleetwood and Lytham St Annes are poor. Also welcome the support for improvements to the A585 (T) as promoted in Wyre Council's Local Plan (Fleetwood-Thornton Area Action Plan) and the supporting text of the Policy CS28 which identifies the potential for the development of an additional link road running from the M55 northwards.	
062	Mr Andrew Yuille, CPRE	Support most of the elements of this policy, with the exception of d) Air and e) Roads, especially the emphasis on the promotion of sustainable travel and the reduction of the need to travel. Increasing accessibility by car is likely to undermine efforts to achieve modal shift and reduce the need to travel. Increasing the scale of aviation will have severe impacts on carbon and other greenhouse gas emissions and should only be promoted to the extent that such increases in emissions can be demonstrably offset by greater reductions elsewhere. Too many, the car may still seem the cheapest and most convenient option, and this issue needs to be addressed in order to reduce emission levels and congestion levels which are likely to rise with the popularity of the retail core in the town centre. Re-allocating road space to buses and cyclists, creating safer & more pleasant walking and cycling environments, and introducing a comprehensive package of sort measures will help to make more sustainable modes of travel more convenient, reliable and attractive, as well as the suggested joint ticketing [5.68]. Reducing the need to travel and changing peoples methods of transport used to more sustainable modes, is central to the Vision of Promoting sustainable development ...and addressing climate change issues.	<p>Support noted most of the elements of the Policy.</p> <p>Wording has been reviewed to increase promotion of sustainable modes of travels while seeking to reduce the need to travel by car. The Council seeks to develop a more sustainable, integrated and efficient transport network which includes strategic improvements to Road and Air connectivity.</p> <p>The aim to maximise increases in sustainable transport provision and use by continuing to make this a more convenient option is being supported by more road space being allocated to buses and cycles and joint ticketing is being proposed for the local public transport network.</p> <p>Private cars will continue to form a major part of transport choice, however, and the Council will continue to ensure efficient movement around the town and surrounding areas.</p>
064	Bourne Leisure	Endorse the Council's overall objective of improving connectivity and reducing car travel, however emerging objectives and policies for transport and accessibility in the Borough should recognise that there is often no feasible alternative option available other than the private car for reaching tourist related developments, including	<p>Point Noted.</p> <p>Agree that train and coach capacity will not supplant car for visitor traffic. Changed relevant text (now para. 5.90) to read "New developments should prioritise ease of</p>

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		<p>holiday parks and villages in more remote and/or rural areas. The need for this different approach is recognised at national level by para 5.3 of the CLG Good Practice Guide for Tourism (2006) which states: "Planners will need to recognise that the wide variety of development that are inherent in the tourism industry means that there some developments....that are car dependant".</p> <p>Moreover, the guide notes (para 5.4): "for small scale schemes, the traffic generated is likely to be fairly limited and additional traffic movements are therefore unlikely to be a reason for refusal for otherwise suitable tourism development".</p>	<p>access by sustainable transport modes especially walking and cycling, to manage congestion and minimise future carbon emissions."</p>

Policy CS6: Green Infrastructure

Policy Comments

047	Mr David Sherratt, United Utilities PLC	<p>The Council should seek opportunities to use developer financial and/or resources contributions to meet common objectives.</p> <p>Use green and open spaces, sports and recreation facilities to address surface water and climate change issues.</p> <p>Building green infrastructure assets such as ponds, swales and wetlands will not only meet the Councils Green Space needs but also their local existing and/or future surface water/ climate change issues.</p> <p>Artificial pitches, cycle paths, play areas, multi-use games areas and skate parks can be used to local underground civil engineering SuDS solutions. SuDS solutions that incorporate irrigation systems will help support and maintain the Councils allotments, parks and garden areas. The Councils should identify opportunities for the installation of retro fitting SuDS.</p> <p><i>[Reason: To ensure that the development is sustainable, properly drained; prevents flooding and environmental damage]</i></p>	<p>Comments noted. Reference has been made to recognising the importance, and support for, the integration and potential retrofitting of Sustainable Drainage Systems (SuDS) such as ponds, swales and wetlands to address surface water and climate change issues and also add to the Borough's green infrastructure networks.</p> <p>Notwithstanding above, reference to the retrofitting SuDS has also been included in policy CS9: Water Management.</p>
062	Mr Andrew Yuille,	Strongly support this policy, but feel it could be strengthened in a	Comment noted. Wherever possible, the allocation of

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
	CPRE	<p>number of respects:- It should clarify that even “where provision is made for appropriate compensatory measures, mitigation or replacement” for loss of green infrastructure, preference should always be given to avoiding loss, with a minimum requirement of no net loss of resource. It should also clarify that DPDs will seek to avoid allocating green infrastructure for development wherever possible.</p> <p>It should clarify that enhancing green infrastructure must be in the context of maintaining or enhancing local distinctiveness and character e.g. there are constraints around ‘remodelling’ spaces in terms of heritage assets such as Stanley Park and listed structures.</p> <p>Due to its unique characteristics, Marton Moss should be specifically recognised and protected by this policy. The planning permission for housing makes it even more important to safeguard the area against further significant encroachment & to maintain its existing character and multi-functional benefits. The above recommendations would help the strategy to comply with NPPF core planning principles to:</p> <ul style="list-style-type: none"> ▪ take account of the different roles/character of different areas recognising the intrinsic character / beauty of the countryside and supporting thriving rural communities within it; ▪ contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework; ▪ encourage multiple benefits from use of land in urban and rural areas recognising that some open land can perform many functions <p>Parts of para 5.83 specifying types of green infrastructure required could usefully be included in policy.</p>	<p>green infrastructure will be avoided, however this must be considered in context of the need to provide sufficient developable and deliverable sites to meet Blackpool’s housing needs, which could include the identification of greenfield sites.</p> <p>Comment noted. Reference has been made in the supporting text to reflect that the enhancement of green infrastructure must be in the context of maintaining or enhancing local distinctiveness and character.</p> <p>The Core Strategy proposes a neighbourhood planning approach for the Marton Moss area (as set out in policy CS26: Marton Moss), as such the community will be involved in deciding the future of the area, which will be set out in a development plan document (either as part of a site allocations and development management development plan document or a neighbourhood plan).</p> <p>Comment noted. Reference has been made in the supporting text to the need for new provision to address identified deficiencies in the future, however it is not considered necessary to identify in the policy the specific types of green infrastructure required as this may alter as a result of work undertaken in the forthcoming Green Infrastructure Plan.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
067	Mr Phillip Carter, Environment Agency	Support this policy in principle, however part 3 states: <i>“measures are supported which seek to preserve, restore and enhance local ecological networks and priority habitats/species.”</i> Suggest this is reworded to provide a stronger emphasis i.e. <i>“Measures which seek to preserve, restore and enhance local ecological networks and priority habitats/species will be required where necessary.”</i>	Comment noted. Part 3 of the policy has been amended in line with the suggested text.

Supporting Text Comments

003	Mr Charles Lea	<p>Para 5.78: you state that biodiversity and flood risk are very important, should any development take place within this greenbelt area. What safe guards are in place to protect the residents? Just to say that either a soak away or pumping station will go some way to protect is not good enough. There is strong evidence to suggest that climate change will effect how we think with regards to building on flood plains. We look back at floods of 2007 in the North East of England, where the Councils had given planning permission to build on flood plains. These people who bought cannot get home insurance nor sell their homes.</p> <p>Para 5.83: with regards to green infrastructure and open space and natural landscaping, with the loss of so many Council owned allotments, there is now a greater need for these this will go some way to help the green open space and benefit the local community.</p>	<p>To clarify, policy CS6 refers to all open spaces and not only green belt areas. The policy approach to flood risk is set out in <i>Policy CS9: Water Management</i>. As stated in the policy, existing green infrastructure will be protected, with any loss only acceptable in exceptional circumstances. Further reference will be made in this policy to the incorporation of Sustainable Drainage Systems (SuDS) such as ponds, swales and wetlands to address surface water and climate change issues and also add the borough’s green infrastructure networks.</p> <p>The existing green belt boundary remains unchanged. To provide clarity, the policy has been amended to state that the national Green Belt policy to protect the openness and character of the Green Belt, local distinctiveness and the physical separation of settlements will be applied. The RSS previously stated that there will be no need for a strategic review of Green Belt with in the North West during the timeframe of the strategy; since the RSS has now been revoked the policy will be amended to state that there will be no strategic review of the Green Belt boundaries in Blackpool.</p> <p>Policy CS6 protects existing green infrastructure, which includes the continued safeguarding of allotments.</p>
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Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
062	Mr Andrew Yuille, CPRE	<p>A map of protected sites may be helpful, along with an indication of buffer zones: though sites themselves are protected, neighbouring land where animals feed etc may not be, and may be vulnerable to development, impacting on wildlife. This would help to comply with NPPF 117: "To minimise impacts on biodiversity and geodiversity, planning policies should:... identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation. A commitment to identifying and protecting functioning ecological networks and increasing biodiversity would enable the strategy to comply with NPPF paras 109 and 113.</p> <p>Greener urban areas where densely populated are very welcome; tree lined streets etc encourage walking and cycling and open up areas; greater use of spaces can reduce crime and so encourage even greater use, creating a virtuous spiral. Green corridors also link in with and encourage active travel, which will help to secure wider objectives such as reducing pollution, carbon emissions and congestion, improving health outcomes etc.</p> <p>This policy should identify & protect relatively tranquil places (NPPF para 123) "Planning policies & decisions should ...identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason". This is particularly important for a highly built-up area such as Blackpool.</p>	<p>As set out in paragraph 117 of the NPPF, components of local ecological networks have been identified and mapped on the Green Infrastructure plan (figure 7).</p> <p>Support noted.</p> <p>Marton Mere provides a tranquil refuge, important for nature conservation, environmental education and prized as an area for quiet recreation. The protection of this area is provided by the designation of the site as an SSSI. Reference will be made to the relative tranquillity of sites such as Marton Mere in the supporting text.</p>
064	Bourne Leisure Limited	<p>Support the definition of "green infrastructure" set out in para 5.77, and taken from the North West Green Infrastructure Guide (2008), which states that green infrastructure is: "...<i>The network of natural environmental components and green and blue spaces that lies</i></p>	<p>Support noted for the definition provided.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<p><i>within and between cities, towns and villages which provides multiple, social, economic and environmental benefits".</i></p> <p>Note the balanced approach being taken within the Core Strategy, particularly the proposed balance with economic considerations and benefits and, therefore the recognition of the need to allow existing businesses to develop/enhance their own sites.</p> <p>Emerging policies on green infrastructure and their supporting text 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 e.g. the inclusion of buffer zone and appropriate landscaping are implemented to minimise both direct and indirect impacts. It should be recognised 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 a new development and this should be encouraged.</p>	<p>Comments noted.</p> <p>As set out in the saved policy in the adopted Local Plan (2006) <i>NE4 SSSI's</i>, "<i>development will not be permitted in or adjacent to a Site of Special Scientific Interest where it would adversely affect, directly or indirectly, its wildlife and nature conservation importance</i>". Furthermore, saved policy <i>NE5</i> states that "<i>development will not be permitted that would destroy or adversely affect County Heritage sites – biological or geological – and other sites of conservation interests, including all ponds in the Borough</i>", which includes the Marton Mere Local Nature Reserve as identified on the Local Plan Proposals Map (2006). The Marton Mere Nature Reserve is surrounded by a range of open spaces that are valued for their character, amenity and openness; as such the importance of adjacent areas is recognised in a number saved Local Plan policies (i.e. <i>BH8: Open Land Meeting Community & Recreational Need / NE1 Development in the Green Belt</i>).</p>
067	Mr Phillip Carter, Environment Agency	<p>Para 5.82: Pleased to see reference to the Shoreline Management Plan in the document as the issue of flood defences and maintaining the existing shoreline is of clear importance to Blackpool over the plan period.</p> <p>Para 5.90: Green Infrastructure can be very beneficial in providing wildlife corridors and habitats for species; we support the proposals for the provision of a Green Infrastructure Plan as part of the Local Plan.</p>	<p>Comments noted.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
Policy CS7: Quality of Design			
Policy Comments			
002	Mr David Boon	Supports the use of qualified architects in the design of major schemes.	The Council's policies support high quality design regardless of the person who has designed the scheme.
003	Mr Charles Lea	<p>Para 5.95 states there is a need for high quality housing and design. All this comes at a cost, there is no such thing as affordable housing or shared ownership. Developers cannot afford the luxury of cheap build houses, as the land they sit on was bought at a high price back in 2000-07 and they cannot afford to build. Whilst most of the major 6-7 house builders in the Fylde have built large apartment blocks with a majority remaining unsold. The average 3-4 bed new built home is £260-£330k. These are not affordable.</p> <p>Concerned that a mix of social and private housing does not work, nor does the mix of house types i.e. apartments/flats and semi detached. Detached 2, 3 & 4 bedroom homes are not what people want. Developments are designed to maximise the space available with disregard of how they look with inadequate levels of parking, with mainly on street parking.</p>	<p>Affordable housing and shared ownership have precise definitions. The Fylde Coast SHMA evidences affordable housing issues in Blackpool and the sub-region; which are considered in Policy CS13: Affordable Housing (this has been updated in the Proposed Submission to reflect the 2013 SHMA findings and also the Viability Study). An Affordable Housing SPD will also be prepared to provide further detailed guidance.</p> <p>A mix of house types, sizes and tenures are essential to create successful residential environments and support balanced and stable communities. Design and parking are important planning issues and are dealt with in Policy CS7 of the Core Strategy and Saved Local Plan Policies LQ1-LQ6 and AS1.</p>
027	Cllr David Owen	Would like to see a further paragraph added along the following lines: <i>"For all major developments of a non-domestic nature the Council will seek to secure a commitment to the inclusion of public art, either as a feature of the building or of its key interior spaces. Where this is agreed not to be possible, a proportion of commuted sums shall be allocated to Arts Service outreach programmes within the area affected by the particular development"</i> .	<p>This policy is more appropriate to a Development Management DPD.</p> <p>Further work is currently being carried out with regards to the Community Infrastructure Levy to establish the priorities for spending CIL (Regulation 123 list) if CIL is found to be viable.</p>
035	Miss Judith Mills, NHS Blackpool	<p>Suggests amendments:</p> <ul style="list-style-type: none"> ▪ Point 1c add <i>'and encourage healthier lifestyles and activity'</i> ▪ Point 1f incorporate well integrated car and cycle parking... <i>'in both commercial and residential developments'</i>. 	<p>Covered in Policy CS14: Health & Education which supports development that encourages healthy and active lifestyles. No change required.</p> <p>This policy clearly covers all types of development. It is therefore not considered that this addition is necessary.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
062	Mr Andrew Yuille, CPRE	<p>CPRE broadly supports this policy. We always seek to secure high quality design and good amenities. It is very important to maintain and enhance locally distinctive character. The policy should be strengthened to require developments to maintain or enhance local character, rather than merely take account of it.</p> <p>Care will be needed to ensure that 'Contemporary and innovative designs welcomed where appropriate' does not damage the heritage value or character of areas, in particular the 37 listed buildings.</p> <p>A single development can have a significant effect on its surrounding area and it would be helpful to include this in the policy. Good design will help balance the housing stock and encourage family living in inner areas where densities are higher.</p> <p>CPRE has produced evidence that shows attractive family housing can be provided at medium-high densities e.g. <i>Family Housing The power of concentration</i> (2008) http://www.cpre.org.uk/resources/housing-and-planning/housing/item/1940- which demonstrates using case studies that high quality, desirable family homes with gardens and communal green areas can be provided in urban areas at medium densities over 50dph. The popularity of Georgian and Victorian squares at about 80dph shows that even higher density family housing can be extremely desirable.</p> <p>The requirement to 'positively contribute and uplift quality of an area' should be included in the policy, to reflect the NPPF that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions (Para 64).</p>	<p>The policy text has been amended.</p> <p>Core Strategy Policy CS8 'Heritage' seeks to safeguard heritage assets from inappropriate development.</p> <p>The density of new development is dealt with in Core Strategy policy CS12.</p> <p>Reference is made in the supporting text to the policy.</p>
067	Mr Phillip Carter, Environment Agency	There are clear links between CS6, CS7 and CS9, we are glad this has been highlighted.	Support noted

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
068	Ms Laura Feekins, CBRE Global Investors	Welcome the support for well designed development emphasised in Policy CS7. Proposals for new development which embrace the design principles in Policy CS7 should be viewed favourably, particularly where such projects are located on strategic routes into the town centre, as they provide an opportunity to set enhanced quality standards with respect to new development generally.	Comments noted Design is an important planning issue, however many other planning issues need to be addressed for a proposal to be considered favourably.
Policy CS8: Heritage			
Policy Comments			
002	Mr David Boon	Concerned that many of Blackpool's heritage assets have previously been demolished / vandalised.	Unfortunately the Council cannot change what has happened in the past; however the Core Strategy recognises the importance of Blackpool's heritage assets and this policy seeks to protect these.
003	Mr Charles Lea	A binding agreement between developers and the Council must be made in order to safeguard any development within the heritage area.	Any development in a Conservation Area requires planning permission which will be subject to conditions.
041	Rose Freeman, Theatres Trust	Pleased to support the Revised Preferred Option especially Key Objective 14, and policies CS8 Heritage , CS16 Blackpool Town Centre and CS17 Winter Gardens, as all promote and encourage existing cultural attractions to strengthen the visitor offer.	Support noted.
062	Mr Andrew Yuille, CPRE	CPRE supports this policy. The emphasis on protecting and regenerating the two main conservation areas and a number of listed buildings are welcomed. Building on the existing character of an area, by drawing inspiration from heritage assets to help shape new developments, as well as safeguarding assets from inappropriate developments, is particularly welcome. Regeneration and investment of key tourist attractions is vital in the future economics of Blackpool. It may be helpful for the policy to refer explicitly to the fact that buildings, features etc that make a contribution to historic character but are not specifically identified also have value and should be respected in new development	Comments noted. Reference added.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
068	Ms Laura Feekins, CBRE Global Investors	CBRE support the recognition of the importance of heritage assets as part of a sustainable future for Blackpool and welcome the statement that the Council will support development proposals that respect and draw inspiration from Blackpool's heritage. In particular, there a number of opportunities for Blackpool to leverage its heritage assets to a greater extent than present as part of the process of creating a balanced portfolio of tourist attractions.	Comments noted.
Supporting Text Comments			
003	Charles Lea	Regarding para 5.99 (Blackpool Illuminations) - whilst they were a big tourist attractions back in 1940's - 1970's visitors numbers have fallen. They do very little for our economy nor generate any income directly. Just to add collection points along the way is not working. Visitors come in drive along the route and drive out again. All this is paid for by Blackpool ratepayers. Why Blackpool Pleasure Beach introduced a Pay Park entrance fee, all said it would not work. Based on a similar lines Blackpool could and should introduce a pay to view or find another way to fund this Illuminations. Why not introduce a Leisure Tax.	Comment does not directly relate to the Core Strategy.
Policy CS9: Energy Efficiency and Climate Change			
Policy Comments			
054	Mr Simon Artiss, Bellway Homes Limited	There is a contradiction between 4 and 6: we support an approach (under 4) that is in line with Building Regulations, being the Governments vehicle for delivering Code for Sustainable Homes, but oppose going beyond this (6) as not being in accordance with Government Guidance. Furthermore, as your strategy seeks the regeneration of urban sites, your requirements at (6) are onerous and will prohibit viable development from taking place.	Point 6 was based on a recommendation in the evidence base (2010 Climate Change & Renewable Energy Study). However, the Council recognises that in some cases this may make some development unviable. The Blackpool Local Plan and Community Infrastructure Levy Viability Study (2014) recommends caution against moving beyond the minimum national environmental standards across the whole Borough and recommends only adopting the minimum standard of Building Regulations. The Sustainable Design and Renewable and Low Carbon

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
			<p>Energy policy* has therefore been amended to align with the nationally described standards in line with NPPF and with the Blackpool Viability Study (2014).</p> <p><i>*Note: Policy CS9 in the Revised Preferred Option now forms two separate policies: Water Management (CS9); and Sustainable Design and Renewable and Low Carbon Energy (CS10).</i></p>
061	Diana Richardson, Sainsburys Supermarkets Ltd	<p>Whilst Sainsburys support all efforts to encourage sustainable development, they recommend that this policy be reworded so that all sections of the policy include the line unless evidence is provided to show that this is not feasible to ensure this policy does not act as a barrier to otherwise sustainable development.</p>	<p>The wording of Policy CS10 has been amended to reflect the concerns raised and to take account of the Blackpool Viability Study undertaken in 2013/4.</p>
062	Mr Andrew Yuille, CPRE	<p>Support the transition of a low carbon future, and policy shows it is priority in new builds. However, the policy should be more clearly based on the energy hierarchy, giving priority in order to:</p> <ul style="list-style-type: none"> ▪ Minimising demand and cutting unnecessary use ▪ Increasing efficiency of use ▪ Increasing use of renewable energy ▪ Continuing use of fossil fuels to be as clean and efficient as possible, e.g. incorporating community heat & power where possible. <p>Bullets c) - f) are sensible but not specifically energy or climate related. Perhaps a separate policy for waste and pollution would be more suitable, as specifics on recycling and waste management could be addressed here. This should be explicitly based on the waste hierarchy, i.e. prioritising, in order, reducing, re-using, and recycling/composting of waste. Bullet e) should clarify that avoidance of pollution is preferable to mitigation.</p>	<p>The Sustainable Design and Renewable and Low Carbon Energy policy has been amended to make specific reference to the energy hierarchy.</p> <p>Parts of the policy referring to pollution mitigation removed as this is covered by Saved Policy BH4 of the adopted Local Plan, the Joint Lancashire Minerals and Waste Local Plan and SPD and will be covered further in the Site Allocations and Development Management DPD, where necessary.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
067	Mr Phillip Carter, Environment Agency	<p>There are clear links between CS6, C67 & CS9; pleased to see this has been highlighted. Support this policy in principle, however, would make the following comments:</p> <ul style="list-style-type: none"> One of the recommendations of the WCS is the removal of surface water from the combined sewer network at the pre submission stage; we would expect this to be reflected in the Core Strategy. In relation to 8e) we recommend the following amendment: <i>Demonstrate that adequate mitigation measures will be put in place where development has potential to cause or be affected by adverse pollution (of air, light, water, ground, noise or vibration). Developments that cannot do so will not be permitted.</i> This is to ensure that development proposals in the areas where existing activities adjacent to development sites could impact upon future occupants/ users, such as residential development adjacent to industrial areas. Part f) refers to the need to implement remediation on sites with pollutants and invasive species. Support this in relation to the remediation of contaminated land (for the protection of controlled waters) and the recognition of the need to control invasive non-native species (INNS). The management of INNS can also contribute to improvements in the quality of existing and proposed Green Infrastructure which can be detrimentally impacted through infestation by INNS. 	<p>Comment acknowledged. Water management issues were previously covered by CS9: Energy Efficiency and Climate change (and also other relevant policies such as Green Infrastructure and Marton Moss). However, it is considered that given the importance of this issue, a separate policy on Water Management has been developed to take account of the concerns raised.</p> <p>Support noted, however due to the detailed nature of Part F and the redrafting of the policy into two separate policies (Water Management and Sustainable Design and Renewable and Low Carbon Energy) it is considered that reference to remediation of contaminated land and the control invasive species would be more suited for consideration as part of the Site Allocations and Development Management document.</p>
Supporting Text Comments			
067	Mr Phillip Carter, Environment Agency	5.119 - The recommendations identified through the SWMP and WCS will inform the IDP in advance of the Pre-Submission. The solutions identified will need to be reflected within policy CS9 (and possibly CS26 and CS27) to ensure sustainable delivery of the plan.	Further guidance for the installation of SuDS will follow in the Site Allocations and Development Management DPD and a possible joint SuDS SPD shared by the Fylde Coast authorities.
037	Ruth Paisley, Blackpool & Fylde College	One of the few organisations in the borough occupying a new build with both pre and post construction BREEAM excellent awards, I would counsel against this requirement. Our experience is that the	The policy requires development to meet BREEAM 'Very Good' and not BREEAM 'Excellent', therefore this requirement would have a reduced impact on the overall

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		cost of achieving such awards for excellence far exceeds the benefits - building features that are required to achieve the standard are not always practical and the energy efficiency and sustainability features of building do not always complement user needs. The figures quoted in paragraph 5.114 are from 2005 and may well be higher in 2012. There is a possibility that this requirement on new build developments could stifle desperately needed investment. The Council is required to revisit this requirement.	development cost than if the policy required the higher BREEAM standard. Furthermore, this requirement has been tested as part of the Blackpool Local Plan and CIL Viability Study (2014) which states “ <i>the additional costs can largely be met through design that does not significantly impact the overall costs. Where additional BREEAM costs are incurred it is likely that these would be offset by the energy savings (and improved value) in the completed building</i> ”. It is therefore considered that it is appropriate to retain this requirement.
077	Fylde Borough Council	Paragraphs 4 and 5 refer to the requirement for residential development to achieve full <i>Code for Sustainable Homes</i> standards and non residential development to achieve BREEAM standards. In order to complete the evidence trail it is suggested that the policy refers to the evidence provided by the SQW Lancashire Sustainable Energy Study 2011 and Update 2012 and the fact that the two standards have now been replaced by the BREEAM Refurbishment for domestic and non domestic schemes standard.	The policy has changed to strengthen reference to the SQW study and to draw more evidence from it. The text clarifies the use of SQW data in the Energy Opportunities Map and the way in which it has been combined with the information from the AECOM Blackpool Climate Change and Renewable Energy study.
Policy CS10: Planning Obligations			
Policy Comments			
037	Ruth Paisley, Blackpool & Fylde College	There is the potential to require new developments to have the infrastructure in place to access skills training via the local FE college or other appropriate provider.	Planning obligations require developer contributions for a wide range of necessary infrastructure. This could potentially include contributions towards bus services, new educational facilities (subject to supporting evidence submitted through the planning application consultation process)
054	Mr Simon Artiss, Bellway Homes Limited	Consider bullet (b) to be rather vague and needs re-drafting to be more specific. Any impact from development does not necessarily have to be off-set via planning obligations;	Part 2 of the policy applies ‘where appropriate’. It is not the case that a contribution is always required. There may be other ways in which any harm is mitigated.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
067	Mr Phillip Carter, Environment Agency	The list of possible facilities to be provided through planning obligations should include flood defences. If the Community Infrastructure Levy is adopted, where flood defence schemes have been identified to protect existing properties and businesses, they should be included within the IDP. Due to changes in funding arrangements, developer contributions may become more important to facilitating the delivery of such schemes.	The supporting text para 5.127 states that the examples quoted are by no means exhaustive.
Supporting Text Comments			
043	Phillipa Clarke, Wyre Borough Council	Para 5.132: Reference to co-operating with adjoining authorities to support the delivery of sub-regional infrastructure is supported and will be pursued under the duty to co-operate.	Support noted.
067	Mr Phillip Carter, Environment Agency	Para 5.132: Support this approach particularly in relation to the provision of drainage infrastructure. However the required measures need to be identified as soon as possible to inform the Proposed Submission Core Strategy.	<p>Comment noted.</p> <p>The Council has worked with United Utilities and the Environment Agency to agree the wording in the IDP and the Water Management policy. The IDP sets out the hierarchy for the management of surface water in new developments.</p> <p>United Utilities and the Environment Agency will continue to be statutory consultees on certain planning applications. Any consultation response will form the basis for negotiating Section 106 agreements.</p>

Chapter 6: Strengthening Community Wellbeing

Ref.	Name/Company	Comment	Council Response (Amendments to plan in bold)
Policy CS11: Sustainable Neighbourhoods			
Policy Comments			
005	Mrs Gillian Wilsden	Agree that upgrading and investment can only serve to provide a better environment for all involved. Agree with the whole concept of the Blackpool makeover and the policies involved.	Support noted.
035	Miss Judith Mills, Blackpool PCT	<p>Pg 70 Point 2b: add <i>“including retail which enhances healthier lifestyle choices, e.g. fruit & veg shops not sweets or fast foods</i></p> <p><i>Point 2f”</i> and sustainable travel parking (cycle sheds) where apartments/flats are developed</p>	<p>Under the Town & Country Planning (Use Classes) Order there is no distinction provided for A1 uses (shops) and so it is not possible to support one retail type over another which falls within the same use class e.g. a greengrocers over a sweet shop. However, as hot food takeaways are an A5 use, it would be possible to manage the locations of such uses as planning permission would be required for change of use provided this is supported by evidence linking A5 uses with detrimental effects on health and wellbeing. As there are no strategic spatial planning implications, further consideration will be given to the above when preparing development management policies (changes to point 2b are not required). Measures to encourage healthy eating will be considered in an emerging ‘Health and Wellbeing Strategy’ for Blackpool.</p> <p>Guidance relating to sustainable travel is provided in Policy CS5: Connectivity (also policies CS27). Detailed guidance is also provided in supporting documents, e.g. the ‘New Homes from Old Places’ SPD. It is therefore not considered that changes to point 2f are required.</p>
061	Diana Richardson, Sainsburys Supermarkets Ltd	Sainsbury’s support the acknowledgement in Policy CS11 that new housing development should be delivered alongside other community facilities, including retail, in order to deliver sustainable communities.	Support noted. Any proposed retail development as part of new housing development will need to accord with the relevant Core Strategy policies (e.g. CS4: Retail) and saved policies within the Local Plan.

Ref.	Name/Company	Comment	Council Response (Amendments to plan in bold)
058	Mr Jack Shea, The Trees Residents Association	The need for the Balanced and Healthy policies in the current Local Plan has been appreciated as many are being retained, but BH1 & BH2 which highlight Talbot & Brunswick have been absorbed into CS11 and it appears that Brunswick has been completely dropped. If other parts of the BH policies are dropped in the SPDs, the fear is that the proliferation of residential homes for 3-5 young people could go unchallenged or make it harder to combat if necessary. Nobody objects to the young and needy getting support, but the community has to be included in the system that places them.	Brunswick is included in the definition of the 'Talbot' neighbourhood as identified on the Local Plan Proposals Map and in Figure 15: Location of Blackpool's Neighbourhoods in the Core Strategy, and is therefore included as part of Sustainable Neighbourhoods policy. For clarity, however, the 'Talbot' neighbourhood has been renamed 'Talbot and Brunswick' in the Sustainable Neighbourhoods policy.
053	Pat Francioni, Talbot PACT Meeting Sub-Committee	Why is Brunswick Ward not included in this section, it should be.	Brunswick is included in the definition of the 'Talbot' neighbourhood as identified on the Local Plan Proposals Map and in Figure 15 and is therefore included as part of Policy CS11. For clarity, however, the 'Talbot' neighbourhood has been renamed 'Talbot and Brunswick' in the Sustainable Neighbourhoods policy.
Policy CS12: Housing Mix , Density and Standards			
Policy Comments			
035	Miss Judith Mills, Blackpool PCT	With reference to part 1a of the policy, reference should be made to ensuring adequate physical activity space is included in plans.	Specific play space requirements are currently set out in <i>SPG 11: Open Space</i> . The PCT will be consulted at the time the Council comes to review this guidance and/or when developing the development management policies.
054	Mr Simon Artiss, Bellway Homes	Would prefer a policy that avoids prescribing proportions of 1, 2, 3 etc bed houses per site as this does not support investment and is potentially contrary to Policy NPPF1. Would prefer this to be left to the negotiation process (informed by the SHMA) with each planning application and informed by the housing market at that time.	It is considered the policy provides appropriate flexibility for the market to decide the precise mix of house types, whilst reflecting evidence of future housing need in the Fylde Coast SHMA and the objective to rebalance Blackpool's housing offer.
Supporting Text Comments			
053	Pat Francioni, Talbot PACT Sub Committee	Para 6.19 "One bedroom flats provide an affordable step on to the housing market". Our opinion is that a very large majority have neither the interest nor wherewithal to even think about purchasing a property.	Paragraph 2.37 (bullet 5) sets out the oversupply of poor quality one person accommodation particularly in the inner areas of the Borough. The Council recognises that a mix of house types and sizes is an essential component of

Ref.	Name/Company	Comment	Council Response (Amendments to plan in bold)
			creating successful residential environments and with regards to the over concentration of one bedroom flats in the inner areas Policy CS12 part 2 seeks to address this.
Policy CS13: Affordable Housing			
Policy Comments			
035	Miss Judith Mills, Blackpool PCT	With respect to part 3d of the policy - whilst observing PH8 NICE guidance on ensuring adequate physical activity space is included in plans.	Specific play space requirements are currently set out in <i>SPG 11: Open Space</i> . The PCT will be consulted at the time the Council comes to review this guidance and/or when developing the development management policies.
054	Mr Simon Artiss, Bellway Homes	The 30% requirement to be subject to viability in accordance with NPPF.	The proposed 30% affordable housing target was subject to viability testing in the 2014 Viability Study Report, which confirms that this is a reasonable target for larger developments of 15units+ except for sites within the Inner Area. Policy CS13 has been amended accordingly.
Policy CS14: Health and Education			
Policy Comments			
035	Miss Judith Mills, NHS Blackpool	<p>Pg 80: add 'incorporate building planning to achieve healthier lifestyle, e.g. stairs positions '.</p> <p><i>Amend Bullet 1 to "Proposals will be supported that complement existing health care facilities currently concentrated at Blackpool Victoria Hospital and at the three supporting primary care centres in south, central and north Blackpool and their smaller local delivery primary care units providing accessible healthcare to neighbourhoods."</i> The reason for this is to reflect that the 3 Primary Care Centres will not be able to provide accessible primary care services to all developments in Blackpool, and so there is still a requirement for a wider range of higher standard smaller health facilities providing locally accessible services to developing neighbourhoods outlined in this plan.</p>	<p>This level of detail is not considered to be required in the introduction to this particular policy.</p> <p>This text has been included.</p>

Ref.	Name/Company	Comment	Council Response (Amendments to plan in bold)
053	Pat Francioni, Talbot PACT Meeting Sub- Committee	Community engagement is essential for any proposals that would increase and/or intensify Drug and Alcohol related services or treatments on established health centre sites and other heavily residential, business or holiday areas.	All consultation on planning applications is carried out in accordance with the Council's adopted Statement of Community Involvement and Government consultation regulations.
Supporting Text Comments			
005	Mrs Gillian Wilsden	In favour of any health and social care education and or advice for those in need.	Support noted.
014	Mrs Angelia Hinds	<p>Paragraph 6.41 refers to the need for a new primary school that is to be built at Baron Road to cater for an existing need and that expected due to inner area regeneration, but there is no mention about a new school for the south of Blackpool.</p> <p>According to the Council CYP department, 193 primary school places will be required for the proposed development of 584 homes at Moss House Road. According to the planning report (09/0740) this 'demand would need to be catered for by a new one form entry primary school. There is now also an additional requirement for a further 25 primary school places to cater for the planning application granted for Runnell Farm (11/0260). Why have the details of this requirement been omitted from the report?</p>	<p>Discussions are taking place between Blackpool BC, Lancashire County Council (LCC) and Fylde BC to look at further primary school requirements as a result of future development in South Blackpool.</p> <p>The Committee report for application 09/0740 states '<i>193 primary places cannot be accommodated in the existing schools and CYP are looking at expanding some schools but also at the need for new schools at the northern end and southern end of the borough.</i>' The developer is to pay a total of £2.43m towards school provision.</p> <p>The Council is currently in discussion with Fylde BC and LCC to explore various ways to deal with additional school requirements in South Blackpool. These include:</p> <ul style="list-style-type: none"> ▪ Increasing capacity at Marton Primary School ▪ Undertaking extensive work at Mereside Primary School to facilitate 2 form entry (previously only 1 form entry) ▪ A school as part of the Whyndyke Farm application ▪ The new Primary School in Central Blackpool which may have a knock on effect and absorb some of the requirement. <p>Detail has now been included in the supporting text to the policy.</p>

Ref.	Name/Company	Comment	Council Response (Amendments to plan in bold)
035	Miss Judith Mills, NHS Blackpool	<p>Suggest amend para 6.37 to: <i>'Provision of health and supporting care facilities at a more local level is led by the provision of three multi-use Primary Care Trust centres covering the north, central and south of the Borough provided at the Moor Park Health and Leisure Centre, Whitegate Health Centre and South Shore Primary Care Centre.'</i> Delete the word Trust.</p> <p>Para 6.38 should start <i>'These purpose built premises support the Trusts vision for a hub and spoke model integrating existing premises with new facilities which bring together and enhance...'</i></p>	<p>The word 'Trust' has been deleted.</p> <p>In line with the plain English agenda, this additional detail is not considered necessary.</p>
060	Lancashire County Council	The CYP Directorate (Provision Planning Team) point out that school provision does not recognise administrative boundaries and a joined up approach is required. It is anticipated that joint working already underway with the planning team at Blackpool will continue.	Comment noted. Blackpool Council continues to work closely with Lancashire County Council regarding new school provision, particularly in South Blackpool.
Policy CS15: Gypsy & Travellers and Travelling Showpeople			
002	Mr David Boon	<i>Comment contains inappropriate content unsuitable for publication.</i>	Comment considered; no further response is necessary.
043	Phillipa Clarke, Wyre Borough Council	<p>Proposed criteria based Policy CS15 is supported as it will allow for the assessment of proposals that come forward for unexpected need and will provide the basis to allocate sites in a Site Allocations DPD. However, the existing criteria should be expanded in line with CLG guidance to allow for a more thorough assessment of sites by including additional criteria related to flood risk and highway safety.</p> <p>'Planning Policy for Traveller Sites' (CLG March '12) indicates that whilst LPAs should make their own assessment of need, they should also work collaboratively to develop fair and effective strategies to meet need. In line with national policy and the requirements of the duty to co-operate, Wyre Council is keen to commence discussions with the other Lancashire authorities and LCC about the feasibility of undertaking a county wide Gypsy and Travellers and Travelling Showpeople accommodation needs assessment.</p>	<p>Support noted. The policy has been amended to incorporate additional criteria in line with the identified CLG guidance.</p> <p>Comment noted. As part of the Duty to Co-operate and Memorandum of Understanding, the Fylde Coast Authorities are currently working together to undertake an assessment of need and to provide for the accommodation needs of Gypsy, Traveller and Travelling Showpeople communities across the Fylde Coast.</p>

Chapter 7: Regenerating Blackpool Town Centre and Resort Core

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
Policy CS16: Blackpool Town Centre			
Town Centre Boundary Comments			
005	Mrs Gillian Wilsden	Agree with the Town Centre boundary	Support noted.
035	Miss Judith Mills, Blackpool PCT	Agree with the Town Centre boundary	Support noted.
041	Rose Freeman	Agree with the Town Centre boundary	Support noted.
061	Diana Richardson, Sainsburys	Agree with the Town Centre boundary, specifically the inclusion of the Central Business District	Support noted.
068	Ms Laura Feekins, CBRE	Agree with the Town Centre boundary	Support noted.
081	Steve Arnold, Noble Organisation	Agree with the Town Centre boundary	Support noted.
Policy Comments			
001	Heather and Phil Brown	More cafes are not needed, there are already far too many, a lot of which are struggling already - and try to find one open after 5pm! Quality restaurants are a better idea.	The policy supports quality cafes and restaurants in order to strengthen the town centre as a first choice shopping, cultural, leisure and business destination.
002	Mr David Boon	Concerned with the number of pound shops & charity shops in the town centre.	The Core Strategy (and Town Centre Strategy) supports development and investment which helps to re-brand the town centre by strengthening the retail offer; attracting higher-end retailers and a more diverse range of goods to reduce the number of discount retailers & charity shops.
005	Mrs Gillian Wilsden	I am all in favour of regeneration of Blackpool Town Centre.	Support noted.
035	Miss Judith Mills, Blackpool PCT	Point 1.b) - introducing quality cafes and restaurants <i>[expand to include reference to] focus on availability of healthier options to improve nutritional balance</i>	Measures to encourage healthy eating will be considered in an emerging Health & Wellbeing Strategy and future development management policies where appropriate. It is not necessary to amend this strategic policy.
041	Rose Freeman, The Theatres Trust	Support Policy CS16 which promotes and encourages existing cultural attractions to strengthen the visitor offer.	Support noted.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
069	Ms Heather Lindley, LS Retail	Policy CS16 reiterates the objective to re-establish Blackpool town centre as the first choice shopping destination. This Policy should also acknowledge the importance of other retail facilities, such as Blackpool Retail Park, that complement the town centre.	This policy is about strengthening Blackpool Town Centre by enhancing its retail, cultural, leisure and business offer for residents and visitors. Policy CS4 deals with retail provision across the Borough.
Policy CS17: Winter Gardens			
Policy Comments			
001	Heather & Phil Brown	Hotel - Thought there were too many bed spaces already! What the Council really means is that they would love to get rid of all the small places and just have large hotels!!! This option should not be considered for the Winter Gardens.	The Winter Gardens policy refers to a range of potential uses for which development may be permitted. There remains potential for a hotel as part of a wider multi purpose complex.
002	Mr David Boon	It should be the entertainment hub of the town - 24/7 bars, restaurants, nightclubs, 18 screen cinema & imax building next to it with an ice rink.	The Winter Gardens policy refers to a range of potential uses for which development may be permitted which includes leisure and entertainment uses.
035	Miss Judith Mills, Blackpool PCT	Point 3.a) - healthier menus should be made available	Measures to encourage healthy eating will be considered in an emerging Health & Wellbeing Strategy and future development management policies where appropriate. This is not an issue to address in the Core Strategy.
		Point 3.c) - retail focus on healthier options, e.g. fruit & veg shops	The Core Strategy cannot enforce certain retail uses.
		Point 3.e) - cycle parking as well as motor vehicle	Cycle parking has been added.
041	Rose Freeman, The Theatres Trust	Pleased to support the Revised Preferred Option especially Key Objective 14, and policies CS8 Heritage, CS16 Blackpool Town Centre and <u>CS17 Winter Gardens</u> , as all promote and encourage existing cultural attractions to strengthen the visitor offer.	Support noted.
081	Steve Arnold, Noble Organisation	Reference our client's objections to Policy R7 in the Preferred Option and the Council's response, Policy CS17.3 still includes a casino as part of the range of entertainment and leisure uses. There is no legal basis upon which any scale of casino development could be accommodated and continuing reference to it under this policy is misleading. It should be deleted.	The Winter Gardens policy refers to a range of potential uses for which development may be permitted. There remains potential for a local casino as part of a wider multi purpose complex, which it remains relevant to include as part of a wide range of potential uses.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
Policy CS18: Central Business District (Talbot Gateway)			
Policy Comments			
001	Heather and Phil Brown	Concerned that the CBD could potentially include new hotels. There are too many bed spaces already.	The CBD policy supports a range of uses including hotels. There is an identified need to reduce the amount of poor quality bed spaces, whilst continuing to support high quality holiday accommodation focused on the Resort Core & Town Centre to strengthen the visitor economy.
061	Diana Richardson, Sainsburys	Support this policy which sets out the comprehensive redevelopment of the Talbot Gateway area of the town centre.	Support noted.
002	Mr David Boon	Raises concern over the amount of money the project has cost. Suggests that Wilkinsons and the Bus Station need to be redeveloped as part of the CBD scheme	Not relevant to the Core Strategy. The former Bus Station will be comprehensively refurbished as part of Phase 1 of the CBD, which includes external alterations and creating new retail units at the ground floor. The Council is the process of acquiring the Wilkinson building in order to facilitate improvements to its façade, and creating an active frontage at ground floor integrating with Phase 1 of the CBD.
033	Diane Clarke, Network Rail	Point 2.a) - Network Rail request that where any of these proposal are concerned we are contacted at the earliest possible stage to review the plans and discuss any potential issue (e.g. asset protection, access, developer contributions).	The Council is keen to engage with Network Rail regarding any future proposals.
Policy CS19: Leisure Quarter (Former Central Station Site)			
Policy Comments			
001	Heather and Phil Brown	Hotel development! Again! Yet you say there are too many bed spaces already for the number of visitors.	Blackpool has too many poor quality bed spaces, which is why the Core Strategy allows more guest houses to change use. High quality accommodation remains an integral part of the tourism offer and will continue to be supported in appropriate locations, which includes the Leisure Quarter site.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
005	Mrs Gillian Wilsden	This Leisure Quarter Site is crying out for re-development. Presently, the site below the Sea Life Centre is a complete disgrace with a tacky 'market' making the area look more like a disused warehouse, than Blackpool's prime 'Crème de la Crème' investment area. The whole area is a gold mine waiting to happen, if only somebody would recognise the potential.	Support for redeveloping the site noted.
035	Miss Judith Mills, Blackpool PCT	Point 2.c): include cycle parks Point 2.d): include cycle permeability	Measures to encourage cycling are incorporated in the supporting Development Brief SPD; specific reference in this strategic policy is not necessary.
081	Steve Arnold, Noble Organisation	Point 2.b) requires new development to integrate with and support existing core uses and attractions; and 2.c) requires parking to be provided. These statements are supported but policy needs to be further refined to ensure new uses complement and do not undermine existing attractions.	Redevelopment of the site will help to broaden the resort appeal and increase visitor numbers; in doing so this will benefit existing uses & attractions. The policy considers the impact on existing uses and attractions by insisting new development integrates with / supports them as appropriate (including retaining adequate parking). It is not considered necessary to amend the existing wording.

Policy CS20: Leisure and Business Tourism

Policy Comments

053	Ms Pat Francioni, Talbot PACT Sub-Committee	Could you explain what <i>'Supporting the improvement and rationalisation of existing holiday accommodation in order to create a consolidated, more stable and successful holiday accommodation sector and more balanced neighbourhoods'</i> means?	The Core Strategy supports improvements to existing holiday accommodation whilst allowing poor quality guesthouses the opportunity to change to high quality residential use outside of main holiday accommodation areas. Part 1d of the policy has been amended for clarity.
057	Closelink Ltd	Policy CS20 should recognise the importance of Blackpool Football Club to leisure and business tourism. With its excellent accessibility and the provision of existing hotels, the area surrounding the football club provides a focus for future leisure and business tourism at the upper end of the market. This will have a consequential benefit to the remainder of the Borough and draw upon the football club's recent success.	The Council acknowledges the importance of Blackpool Football Club and it is identified as a key leisure attraction on the key diagram. The main focus of this policy is on the Town Centre and Resort Core, however reference is made in the part 2 of the policy to council support for tourism investment focused on exiting outdoor leisure and recreation facilities outside of the resort core and town centre which could include Blackpool Football Club.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
064	Bourne Leisure Ltd	<p>Strongly object to leisure/tourism/visitor accommodation policies relating solely to the Resort Core (Chapter 7). These policies such as Policy CS20, should apply not only to the resort core and town centre, but also to the wider resort area. It is important that holiday villages such as Marton Mere located outside these narrowly defined areas have a positively worded policy context, to promote their enhancement and where appropriate, their expansion. Particularly given the plan is to supersede Local Plan Policy RR2: Visitor Accommodation which supports improvements/ redevelopment of other tourism sites.</p> <p>Support the principle of 'providing high quality attractions and accommodations which help to broaden the resorts appeal alongside key entertainment landmarks' but considers this requires rewording to include sites outside of the core. Emerging Core Strategy policies for tourism based regeneration within the resort and town centre should be clearly placed within wider local plan policies promoting tourism related development for the Borough as a whole. Borough wide policies should support existing tourism operators, to 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 Marton Mere.</p> <p>A new specific policy for promoting the enhancement of existing holiday parks should support their enhancement and long term future. Bourne Leisure suggests the following wording: <i>The Council will:</i> <i>(i) 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</i></p>	<p>This policy does not relate exclusively to the Resort Core and Town Centre. It is acknowledged that the chapter heading has caused confusion and this has been amended.</p> <p>Part 2 of policy CS20 specifically states '<i>outside the resort core and away from the seafront, new investment will be focused predominantly on outdoor leisure facilities</i>'. The supporting text specifically includes reference to Marton Mere Caravan Park.</p> <p>A paragraph has specifically been added to the supporting text that recognises the importance of facilities such as Marton Mere Caravan Park.</p> <p>This is considered to be more appropriate as a Development Management policy and will be explored as part of the preparation of Site Allocations and Development Management Policies DPD.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<p><i>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</i></p> <p><i>(ii) allow for operators to undertake a phased approach to consolidation, improvement, upgrading or extension of existing caravan and sites and holiday parks over several years, ensuring that the existing accommodation and visitor operation is not disrupted and that each proposal caters appropriately for current and forecast needs and demands.</i></p> <p>The introduction of such a policy would also respond to an issue identified at bullet point 3, page 10 of the Fylde Coast Visitor Accommodation Study, which states that: <i>"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"</i>. Moreover, para 45 on page 83 of the Study notes that <i>"There is a need to reinvest in existing sites"</i> and goes on to confirm that <i>"the larger sites such as Marton Mere (Haven)... have indeed reinvested in recent years - with occupancy increasing as a result"</i>.</p> <p>Bourne Leisure stress the need for new policy in the emerging Core Strategy which applies to existing holiday parks and which would help to address the identified need for continued reinvestment and reflect the positive economic benefits of reinvestment.</p>	<p>The reference made here relates to Wyre Borough Council in the Humberts study and not Blackpool.</p> <p>A new Core Strategy policy is not considered to be required. Policy CS20 recognises the Council's support for investment and enhancement of existing facilities such as Marton Mere Holiday Village.</p>
068	Ms Laura Feekins, CBRE	CBRE support the objective to attract new audiences to Blackpool year round. However, where it can be demonstrated that proposals for new attractions and facilities outside the Town Centre and Resort Core will also support this objective and will not undermine the	The policy wording provides sufficient flexibility for new leisure attractions outside the resort core and town centre where there are exceptional circumstances.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		Resort regeneration, then these should also be considered, and should not be limited to outdoor leisure facilities. Would welcome clarification that this is accommodated for in Policy CS20 and that use of the word <i>predominantly</i> means that leisure facilities generally outside the Town Centre and Resort Core would be considered.	
081	Steve Arnold, Noble Organisation	Support the focus on strengthening the resort's appeal to new year round audiences and the improvement and enhancement of important existing attractions such as Coral Island.	Support noted.
Supporting Text Comments			
025	Blackpool Pleasure Beach	<p>Para 7.24: should make it clear that the Council places as much importance on the improvement and further development of existing attractions as it does on the development of new ones. Currently this reads as if the strategy is primarily based on the development of new attractions. Whilst new attractions will undoubtedly contribute to the regeneration and improvement of the Resort Core, investment in existing attractions is more likely to come forward and can contribute equally. This has recently been seen with the development of Nickelodeon Land at Pleasure Beach, the revitalisation of Blackpool Tower and the refurbishment of the existing waxworks as Madame Tussauds.</p> <p>Consider Para7.24 should be reworded as follows: "<i>If Blackpool is to build on its status as Britain's favourite seaside resort, it needs to provide new high quality attractions and accommodation alongside investment in key existing leisure and entertainment landmarks, which together will help to broaden the resorts appeal. This should create more repeat visits and encourage new visitors to the resort year round, revitalising the visitor economy and positioning Blackpool at the forefront of the tourist market</i>".</p> <p>Support para 7.28, which supports high quality tourism related</p>	<p>There is a need to provide additional high quality attractions alongside those that exist at present.</p> <p>Paragraph 7.24 has been amended.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		development at existing attractions and recognises the need for complementary development to reinforce their role and secure their long term future.	Support noted.
Policy CS21: Arrival and Movement			
Policy Comments			
005	Mrs Gillian Wilsden	Expresses a preference to visit Freeport and other out of town shopping areas, because of easy access, parking and a pleasant environment to enjoy a lunch etc.	This policy (now merged into CS5: Connectivity) seeks to enhance the experience of arrival in and movement around the resort and town centre Supporting measures including parking provision, enhanced public realm and other transport infrastructure.
025	Blackpool Pleasure Beach	Support Policy CS21, in particular the improvement of pedestrian routes for visitors to enable them to access the town centre and major visitor attractions and the recognition of the need to provide "sufficient, high quality and conveniently located coach and car parking to support the town centre and resort economy". It is, however, important that the supporting text defines "sufficient" and at the very least aims to ensure there is no loss to existing supply, and that the Council, developers and other stakeholders look at ways of improving parking provision.	Support noted. The general focus of the Core Strategy policy is to provide sufficient high quality parking where it is needed, and it is not realistic or appropriate to include a specific statement that there will be no loss to existing supply.
035	Miss Judith Mills, Blackpool PCT	Point 1d: include signposts with travel time for walking/cycling Point 1e: cycle parking	Policy revised to include for measures to increase the use of cycling and walking.
037	Ruth Paisley, Blackpool and The Fylde College	There is a pressing need to improve the public transport links to post 16 provision from within the borough and across the Fylde Coast. The lack of an integrated, comprehensive, low-cost public transport network can be a significant barrier to learning and skills development.	Not all routes can be covered by the public transport system though coverage within Blackpool is generally considered good.
063	Cllr Christine Wright	The minimum number of parking spaces needs to be increased for new builds and others like schools, DWP, Hospitals, Health Centre's etc; and other large employers. I know we try to get travel plans in place, but we have to be realistic, in a lot of cases they don't work and it's our residents that end up suffering.	Saved local plan policy AS1 (which continues to be saved) sets out parking requirements for new development in accordance with the parking standards set out in Appendix B of the Local Plan.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
			<p>A review of the parking standards is likely to take place as part of the Site Allocations and Development Management DPD.</p> <p>Paragraphs on parking have been included in policy to address parking shortfall in the town centre and the inner areas.</p>
081	Steve Arnold, Noble Organisation	Support (e), providing sufficient, high quality and conveniently located car parking to support the town centre and resort economy.	Support noted.
Supporting Text Comments			
025	Blackpool Pleasure Beach	<p>Para 7.37: Support the recognition that the arrival experience needs to be managed, although we consider that this should also state that the arrival experience should be "improved".</p> <p>The second sentence states <i>"the correct mix of shopper and visitor parking" is "essential"</i>. This should also recognise that the amount / location of parking is equally important and the loss of existing provision will not be acceptable, unless redevelopment proposing the loss of provision creates alternative provision elsewhere. Pleased that "accommodating vehicles within reasonably priced, good quality and convenient car parks" is a priority for the Council.</p> <p>Para 7.37 also states: <i>"The general strategy is to minimise cross town movements by locating car parks at main arrival points into the resort and the town centre."</i> Support this approach, although this will only work if there is clear signage and if the routes between the car parks and the visitor's destination in the resort core are improved. This should be specified in supporting text (and ideally the policy) because at present a number of key routes, particularly to the South Beach attractions, require significant improvement.</p>	<p>Revision to text (now para. 5.67) to include that the arrival experience should be "improved".</p> <p>The general focus of the Core Strategy policy is to provide sufficient high quality parking, and it is not realistic or appropriate to include a specific statement that there will be no loss to existing supply.</p> <p>Support noted.</p> <p>Text revised to include clear signage for pedestrian routes between car parks and visitor attractions.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
Policy CS22: Key Resort Gateways			
Policy Comments			
057	Closetlink Ltd	The vicinity of the Football Club should be recognised as a major gateway to the town with new development being encouraged. This will enhance one of the most important approaches into Blackpool and present the first image to many visitors as being of a vibrant and buoyant leisure and business destination.	The policy seeks improvement / enhancement to Central Corridor within which the Football Club is located. Redevelopment underway at Rigby Road will considerably improve the appearance of the area. The Football Club is recognised in the supporting text to the policy.
025	Blackpool Pleasure Beach	<p>Object to Policy CS22 as currently worded.</p> <p>Part 1 of the policy needs to make clear that redevelopment of land within and adjoining the corridor that reduces the level of parking provision will not be acceptable. In our view, there is no reason why the Central Corridor cannot be improved, remodelled and enhanced whilst at the same time ensuring no loss of car parking provision. A loss of parking provision will make Blackpool less attractive to visitors and will not compare well to locations that compete for the same visitors, for example the Trafford Centre or Alton Towers, both of which provide sufficient capacity for all those wishing to visit. Blackpool needs to remain competitive in the region compared to such alternatives.</p> <p>Part 2 of the policy is presumably referring to the 'Key Resort Gateways' on Figure 16. In our comments on Figure 16, we raised the need for additional Gateways to the South Beach attractions (Pleasure Beach, Sandcastle and South Pier), which are some of the most-visited attractions in the north west region, to be identified. This policy can then make reference to them alongside those already defined. In particular there needs to be recognition that the route between the Central Corridor and the South Beach attractions needs to be significantly enhanced and improved, potentially by major physical remodelling, and that the route</p>	<p>Para 7.40 states “a change in car parking provision as a result of major redevelopment must not undermine the resort’s ability to accommodate visitor trips”. Any change in parking provision in this area would be subject to an overall assessment of parking need to adequately meet the requirements of that area. Therefore, it is not considered appropriate to include a specific statement that there will be no loss to existing supply. Policy CS5 contains more information on parking provision.</p> <p>Central Corridor is one of the key resort gateways referred to as a key strategic gateway to Blackpool. It includes Seaside Way and car parking close to the Pleasure Beach and adjacent to the area defined as South Beach. The Core Strategy promotes improved vehicular and pedestrian linkages through the Corridor and improved parking and reception facilities; and this is considered sufficient to address this issue.</p> <p>Key Resort Gateways provide direct access into the town centre and resort. Squires Gate Lane (A5230) is identified on page 15 of the plan in the Spatial Portrait as a key</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		between Blackpool Airport/Starr Gate to the South Beach attractions is a key gateway, both for those arriving in Blackpool via the M55 (and Squires Gate) and those travelling by air.	strategic route into Blackpool. However this road does not provide a direct route into the town centre and resort and is therefore not considered a key resort gateway.
005	Mrs Gillian Wilsden	If this vision for the future of Blackpool 'Gateways is implemented, then the whole concept of first impressions counting will pay off, and help to turn the complete visitor experience into a desire to return again and again.	Support noted.
Supporting Text Comments			
025	Blackpool Pleasure Beach	<p>Para 7.39: Support recognition of the need to improve the Central Corridor south of Waterloo Road bridge.</p> <p>Para 7.40 should recognise the need to create a new key gateway between Central Corridor and South Beach, for reasons set out elsewhere in our representations. This will require some remodelling of the routes between the two points. Contributions to these works could be sought from key development sites in the Resort Core.</p> <p>Para 7.41: Support the recognition that <i>"any change in parking provision as a result of major redevelopment must not undermine the resorts ability to accommodate visitor trips"</i>. Suggest it should be clarified that <i>"normally this will be achieved by ensuring no loss of car parking capacity"</i>. This is important for the reasons set out in earlier comments [drawing attention to the need for Blackpool to remain competitive with other regional tourism destinations that provide large numbers of high quality car parking].</p>	<p>Support noted.</p> <p>Central Corridor is one of the key resort gateways into Blackpool. It includes Seaside Way and car parking close to the Pleasure Beach and adjacent to the area defined as South Beach. The Core Strategy promotes improved vehicular and pedestrian linkages through the Corridor and improved parking and reception facilities; and this is considered sufficient to address this issue.</p> <p>Support noted. As previously stated, any change in parking provision in this area would be subject to an overall assessment of parking need to adequately meet the requirements of that area. Therefore, it is not considered appropriate to include a specific statement that there will be no loss to existing supply. Policy CS5 contains more information on parking provision.</p>
057	Closelink Ltd	Greater emphasis should be placed on the opportunities for enhancement of the Seaside Way corridor close to the football club. The Rigby Road sites are of strategic importance and it is essential that development and regeneration of these sites is encouraged in a realistic fashion.	Central Corridor includes Seaside Way and Yeadon Way in Policy CS22 as set out in paragraph 7.39.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
Policy CS23: Promenade Holiday Accommodation			
Policy Comments			
005	Mrs Gillian Wilsden	Agree that the Promenade needs to be protected from further misuse, but the surrounding area must also be up to scratch.	This policy is primarily about identifying those Promenade frontages where holiday accommodation can change to residential use and those where restrictions apply. Where new development is permitted, it identifies criteria which must be met to ensure this is high quality. Policy CS23 has been merged with CS24 in the Proposed Submission.
053	Pat Francioni, Talbot PACT Meeting Sub-Committee	Will the new building proposals have to comply with safeguards to ensure that the proposed buildings and street furniture etc. compliment and contrast with existing Victorian and Edwardian structures they would sit alongside? This is applicable throughout the ward, and indeed throughout the town and promenade areas where significant building from these eras take centre stage.	Where new residential development is permitted on the Promenade, this policy requires it to meet high standards of design and relate well in use, scale and appearance to neighbouring properties. Proposals would also need to satisfy other policies, including Policy CS7: Design Quality and CS8: Heritage, which require new development to take account of the character of the local area (CS7) and enhance existing features of heritage significance (CS8).
Supporting Text Comments			
038	Mr Max Smith	Our hoteliers group is confused as to the aims and objectives of the Revised Preferred Option. We have taken a view that you now seek to make a distinction between hotels located in the main promenade holiday area and those which are not. We have also assumed that you are defining this distinction by referring to the 'Resort Core'... We have studied [this policy + supporting text] and have noted that its main thrust (and indeed its introductory heading) is "Regenerating Blackpool Town Centre and Resort Core". Because Bourne Crescent is shown in the Key Diagram as being outside the Resort Core, we have taken this to mean that [this policy + supporting text] do not refer to Bourne Crescent for the simple reason that Bourne Crescent does not form any part of the Resort Core to which these pages direct their attention.	The Council have responded directly to Mr Smith to clarify the policy and address some misunderstandings. This included clarifying that Bourne Crescent lies outside the defined Resort Core but is currently inside one of the defined Holiday Accommodation Areas (the Pleasure Beach Promenade Frontage) as defined in the supporting Holiday Accommodation SPD which was adopted in 2011. The holiday accommodation areas are not shown on the Key Diagram because they are not defined in the Core Strategy (they are defined in the SPD). The majority of these areas are located within the Resort Core (which contains most of the resorts tourism offer) but there are a small number of areas currently identified which do not, including Bourne Crescent, albeit these lie adjacent

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<p>Your letter (6th July)... indicates that the Proposals Map forming part of the current Local Plan places Bourne Crescent outside of the Resort Core. Whilst our group has been unaware of this, we take heart from the fact that neither the current Local Plan nor the Revised Preferred Option place Bourne Crescent within the Resort Core. You indicate that according to the adopted Holiday Accommodation SPD, Bourne Crescent is within the 'Pleasure Beach Promenade Frontage'. We are at a loss which document takes priority over the other.</p> <p>Our request has been for Bourne Crescent to be no longer considered a prime holiday destination. We have supported this request [over] the past 7 years by demonstrating that almost ALL of the hotels on Bourne Crescent are non- viable. Most of them are either closed down completely or are in serious difficulties (see attached addendum). None of these hotels sees any prospect of any future improvement in trading.</p> <p>Your letter refers to Policy CS23. Our group is now presuming that, despite the main Heading "Regenerating Blackpool Town Centre and Resort Core" in the Revised Preferred Option, Bourne Crescent is somehow within the scope of Policy CS23 despite our hotels being outside of the 'Resort Core'. May we assume that, for the purposes of Policy CS23, you seek to place us within the meaning of paragraph 1(b) of this policy?</p> <p>We [would like] Bourne Crescent to be considered as forming part of paragraph 1(c) as this would finally make our hoteliers group free to replace our failing hotels with high quality residential development which 1(c) says 'will be supported'.</p> <p>You acknowledge there is an oversupply of 14,000 bedspaces in</p>	<p>to it. This policy sits within Chapter 7 because it helps to support regenerating the Town Centre and Resort Core. Given that the policy applies to some parts of the resort that are strictly outside the defined Resort Core, this has been explained upfront in new introductory text to this chapter and repeated in supporting text to the policy for further emphasis.</p> <p>The defined Holiday Accommodation Areas can only be revised through a formal review of the SPD. Whilst there is an opportunity to review these areas in the future, there would need to be evidence to support this. Until we review the evidence this may/may not support a change in the area around Bourne Crescent. The Proposed Submission policy no longer identifies the areas to give more flexibility should we undertake an SPD review.</p> <p>As currently worded part 1.b) includes Bourne Crescent as this is within one of the 'main holiday accommodation promenade frontages' defined in the SPD. To address some confusion, the policy has been simplified by combining CS23 & CS24 and referring to these as 'main holiday accommodation areas'. For clarity, this will continue to include Bourne Crescent.</p> <p>As previously stated, the main Holiday Accommodation Areas are not defined in the Core Strategy, but in the supporting SPD. Any change can only be considered through a formal SPD review based on evidence available.</p> <p>Within the main holiday accommodation areas, which</p>

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		<p>Blackpool. By supporting our efforts to exchange failing hotels for high-quality residential development, you would achieve the removal of some 600 bedspaces (excluding the Palm Beach Hotel which is the subject of a separate planning application). You would also exchange approx. £140,000 in annual Business Rates for around £800,000 in Council Tax from the new residential units. This would provide a massive enhancement to Blackpool's annual income and enable important projects to be undertaken whereas many of those are currently delayed / even abandoned.</p> <p>Para 7.45 refers to 'the opportunity...for providing high quality residential accommodation on the seafront' - endorse this policy statement and reiterate our representations to move forward from unviable tourist use to the very highest calibre of residential accommodation. Favourable consideration of our request would be much appreciated, and would open the doors for spectacular new development at the southerly end of the Blackpool seafront.</p> <p>Addendum: 6 hotels have been closed for considerable time with little/no prospect of re-opening; several others are in imminent danger of closing shortly. Further evidence of support may be obtained from the following hotels if required: Skye Hotel, Trafford Hotel, Henderson Hotel, Bourne Hotel, Warwick Hotel (all closed), Kenilworth Hotel, Kimberley Hotel, Waldorf Hotel (all in difficulties), Headlands Hotel & Colwyn Hotel. The Palm Beach is at present pursuing a planning application on its own account.</p>	<p>include Bourne Crescent, the focus is to safeguard existing holiday accommodation. However, change of use/redevelopment will be considered where very exceptional circumstances are demonstrated as set out in policy (which includes viability considerations). Individual proposals require further discussion with the Council.</p> <p>See above response. The Council has since had further discussions with hoteliers on Bourne Crescent regarding future redevelopment options.</p> <p>This information will be considered when undertaking a formal review of the SPD and when determining future planning applications as appropriate.</p>
Policy CS24: Off Promenade Holiday Accommodation			
<i>Comments on the approach set out in Policy CS24 (To clarify, we did not invite comments in relation to the precise holiday accommodation area boundaries. These are set out in the adopted Holiday Accommodation SPD which was not part of this consultation)</i>			
001	Heather & Phil Brown	Agree with the approach	Support noted

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
005	Mrs Gillian Wilsden	One response agrees with the approach, one disagrees - despite consultations and petitions going back to 2001, followed by assurances that we would still be in the Holiday Area, and also fairly recent consultations on the matter, Station Road, Withnell Road and Osborne Road (east of Bond Street), have been left out of the Holiday Area. This area is being deliberately hung out to dry. Estate agents already inform potential buyers of holiday premises of the future lack of Holiday Area status, the intention being that these properties will deliberately not acquire their true price value. Understand the Estate agents have a job to do in informing clients that this is happening, but also that the Council is deliberately causing this situation and that they deliberately recognise the market value reduction as a result of this action.	It is unclear whether this comment supports the overall approach to defining main holiday accommodation areas but disagrees that certain streets (Station Road, Withnell Road & Osbourne Road have been omitted, or disagrees with the overall approach. The approach is justified and allows the Council to manage the reduction of holiday bed spaces, which is why it is the preferred way forward. The issue regarding the chosen areas or the detailed boundaries of those areas is not a matter for the Core Strategy, as these are defined in the supporting Holiday Accommodation SPD which was subject to consultation. Any change can only be considered through a formal review of the SPD and must be supported by evidence.
021	Mrs Ivy Bagot	Agree with the approach	Support noted.
025	Blackpool Pleasure Beach Ltd	Agree with the approach	Support noted.
035	Miss Judith Mills, NHS Blackpool	Agree with the approach	Support noted.
068	Ms Laura Feekins, CBRE	Agree with the approach	Support noted.
Comments on the alternative options previously discounted			
021	Mrs Ivy Bagot	A vast amount of work has been carried out by one and all. We are nearly there. Blackpool motto "Progress" has certainly been achieved.	Support noted.
Policy / Supporting Text Comments			
025	Blackpool Pleasure Beach Ltd	Paras 7.51 – 7.58 - Support the approach which addresses our comments made at previous stages of the Core Strategy.	Comment noted.
053	Pat Francioni, Talbot PACT Meeting Sub-	The Town Centre Holiday Zone must be defined and protected by the rules already in place and far more robust application of these rules must be brought to bear. It was always understood that our	It is presumed this comment is referring to the 'South Town Centre' Holiday Accommodation Area. Whilst the Proposed Submission policy no longer identifies areas,

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	Committee	<p>defined holiday areas were sacrosanct. Now anything and everything is allowed and this must change.</p> <p>Quoting from the Holiday Accommodation SPD: Para 5.4: This statement does not offer any protection from HMOs and offers the community no safeguarding at all. Para 5.24: Please explain the expression "in-house bars" and why they provide an ideal location for a vibrant town centre? This statement leaves a wide open gate to HMO abuse in the area mentioned. The Holiday Area must be protected at all costs.</p>	<p>they remain protected as they are defined in the current SPD (removing them from policy provides more flexibility should we undertake a future SPD review). The Proposed Submission has been amended to provide clarity with respect to change of use of holiday accommodation. The Council also issued additional guidance on its website (www.blackpool.gov.uk/holidayaccommodation) to explain how the policy approach in managing future change of use will help to create better neighbourhoods.</p> <p>Comments relating to the Holiday Accommodation SPD (adopted in 2011) cannot be considered as part of this consultation. In response to the issues raised, Para 5.4 of the SPD sets out restrictions on change of use within the defined areas preventing existing holiday accommodation from changing to residential use (including HMOS) where planning permission is required. Also, saved policy HN5 of the current Local Plan (2006) states that HMOs will not be permitted. Reference to 'in-house bars' acknowledges the facilities provided in some of the larger premises. Holiday accommodation in this (South Town Centre) area close to the town centre supports a vibrant resort offer.</p>
071	Amanda Meek, South Shore Branch Manager, Royal Bank of Scotland (submitted as part of the South Shore area petition)	Writing to give my support to the campaign that is running to reclassify the South Shore Area of Blackpool. As one of the only banks left in the area I believe that the current situation is affecting a substantial amount of my customers' livelihoods and I believe the Council needs to re-evaluate this decision. I am aware of a number of local businesses, not only those that are my customers, who have been impacted by the decision and I am fully in support of this campaign.	The specific issue regarding the detailed boundaries of the main holiday accommodation areas is not a matter for the Core Strategy, as these are defined in the Holiday Accommodation SPD which was subject to consultation. Any change can only be considered through a formal review of the SPD and must be supported by evidence.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
072	<p>Mr C Aiken-Graham and G Wilsdon</p> <p>Petition submitted on behalf of the South Shore area which includes approx. 245 signed letters and a further 160 names. The majority of these people are local residents from the South Shore area, although it also includes some who aren't.</p>	<p>Guest houses form an important part of Blackpool's backbone, therefore Blackpool wouldn't be where it is today without them.</p> <p>Up to 1,000 visitors per hour frequently walk down Withnell Road alone as well as Station and Osborne Road, whilst en route from the car parks in order to reach the Promenade. These three roads provide the first impression of Blackpool for the visitor on arrival and the last impression when leaving the resort.</p> <p>We believe that we rightly deserve to be an important and integral part of Blackpool's future within the tourism development and investment. We want to be regarded in the same light as all the other tourism providers in Blackpool.</p> <p>Many hotels, guest house and holiday flats proprietors in the area remember that we had to fight to stay in the holiday zone 12 years ago. At that time, we were informed by a top recognised source that Blackpool Pleasure Beach 'will be expanding northwards' and 'the Council wants the Pleasure Beach to expand further than this and we will encourage them to do so'.</p> <p>Residents were expected to support the regeneration then, as is still the case, but it is very difficult to offer support when it could mean the end of your livelihood, your home, your business and your life as you know it. We were even issued with information on the possibility of compulsory purchase; many people sold up and moved on the strength of the pending uncertainties.</p> <p>How much more uncertainty do we have to endure? Residents have now reinvested in their properties as the majority of us do have pride in our properties, but with the constant gnawing away at the edges with the eternal threat to take us out of a holiday area, which incidentally, Blackpool is a 'holiday town' and is extremely</p>	<p>In summary, this petition objects to Withnell, Station and Osborne Road (east of Bond Street) being excluded from the holiday accommodation area and wants the whole of Blackpool to be considered a holiday area.</p> <p>The issue regarding the chosen areas or the detailed boundaries of those areas is not a matter for the Core Strategy, as these are defined in the supporting Holiday Accommodation SPD which was subject to consultation. Any change can only be considered through a formal review of the SPD and must be supported by evidence.</p> <p>The Proposed Submission policy no longer identifies the general areas to give more flexibility should we undertake an SPD review.</p> <p>The key issues raised show there is a misunderstanding by some people about the policy approach to managing a reduction in holiday accommodation. To address some confusion, the policy wording and supporting text has been amended in the Proposed Submission to provide more clarity.</p> <p>The Council has also issued additional guidance on its website (www.blackpool.gov.uk/holidayaccommodation) to explain what the policy is trying to achieve along with wider Council initiatives, in terms of a better balance of quality homes and holiday accommodation to support more sustainable neighbourhoods, and also what the policy is able to specifically control in terms of future change of use.</p>

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		<p>difficult to accept.</p> <p>People come from all walks of life to holiday in Blackpool and not everyone can afford to stay in a 4 or 5 star hotel. There is still a huge market for the guest house and medium hotel fraternity; we deserve the same opportunities as the areas that the Council has earmarked as the 'holiday area'.</p> <p>Despite reassurances to residents that being a 'non holiday zone' will not affect our businesses, we are already aware that Estate Agents, Surveyors and Solicitors have a duty to inform potential buyers. The Council have been saying this will make no difference. This has led prospective buyers sensing that buying in a 'non holiday zone' will not offer the same benefits as a property in the 'holiday zone'. What do we do spearhead UDI?</p> <p>We are still fighting to be heard and we are calling on all of Blackpool South Shore (Pleasure Beach if you must) residents and business owners alike to voice their true opinions of 'Blackpool is already in its entirety and by definition a Holiday Town, there should not be any other holiday zoning within the town including South Shore or Pleasure Beach as defined in the main holiday accommodation area off the promenade'. Let us stand together.</p>	
082	Mr P Crossley, Kenricks Estate Agent (sent to Mr Aiken-Graham and submitted as part of the South Shore area petition)	<p>As a local commercial estate agent, this will have a detrimental effect on your ability to sell your hotel. This in turn will affect the value of your property and in my opinion will devalue it considerably although at this stage is not possible to put a figure on this.</p> <p>When the possibility of removing other roads in the area from the holiday zone, namely Palatine / Reads Avenue, was being discussed, the mere suggestion had a negative effect on the saleability of hotels up for sale. An example of this is that we had a number of</p>	<p>Whether guest house owners are within a main Holiday Accommodation Area or not should not affect lending, as quality holiday accommodation is supported by the policy wherever it is located. The Proposed Submission policy and further guidance published on the website takes the opportunity to clarify this so that banks and commercial agents are not misinterpreting the policy.</p> <p>Lack of lending from banks reflects the difficult economic</p>

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		<p>clients who were viewing hotels in both Palatine and Reads who were being told by other hoteliers who were in the holiday zone that Palatine and Reads Avenue were going to be removed from the holiday zone. As a result of this some of the clients subsequently withdrew their interest from any hotel on Palatine or Reads Avenue. A regular comment we heard was “we don’t want to buy a hotel outside the holiday zone”.</p> <p>Another concern I would have would be in relation to the banks. In this difficult economic climate, banks are reluctant to lend the purchase of hotels and I suspect once a hotel is removed from the holiday zone the Banks may use this as an excuse not to lend.</p> <p>In effect it could be argued the removal of your hotel from the holiday zone is blighting to your hotel and possibly your business.</p> <p>May I take this opportunity of wishing you the best of luck in convincing the Council to allow your road to remain within the holiday zone.</p>	<p>situation and the unwillingness of banks to lend money. People are having problems getting mortgages for homes or loans for their business across the whole country, not just in Blackpool. The leisure sector is no exception to this, particularly in a seaside resort like ours with too many bed spaces. This has meant the business values of holiday accommodation have struggled to be maintained.</p> <p>The key issues raised show there is a misunderstanding by some people, including the banks and commercial agents, about the policy approach. As previously stated the Proposed Submission policy and supporting text, as well as further information published on the Council’s website, takes the opportunity to clarify this so that people are not misinterpreting the policy.</p>
	<p>Mr Docherty, Petition submitted on behalf of the Coronation Street area which includes approx. 193 names and 3 letters</p>	<p>Request that Coronation Street be brought into the Holiday Zone. We believe that Coronation Street is the arterial heartbeat of this area and if excluded it will deteriorate as other streets have done which were once vibrant holiday trading areas. We believe its continued exclusion is detrimental to the area for the following reasons:</p> <ul style="list-style-type: none"> ▪ It is devaluing the existing businesses and making them harder to sell ▪ Prospective purchasers believe that it is unsafe to buy a business excluded from the holiday zone ▪ Holiday flat owners on Coronation Street do not need change of use to become permanent. This is having an adverse 	<p>In summary, this petition requests the inclusion of Coronation Street within the defined holiday accommodation area. The issue regarding the chosen areas or the detailed boundaries of those areas is not a matter for the Core Strategy, as these are defined in the supporting Holiday Accommodation SPD which was subject to consultation. Any change can only be considered through a formal review of the SPD and must be supported by evidence. The Proposed Submission policy no longer identifies the general areas to give more flexibility should we undertake an SPD review.</p>

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		<p>effect on the holiday area</p> <ul style="list-style-type: none"> ▪ The business owners in the streets leading onto Coronation Street feel that the incoming of anti-social tenants is having a tremendous adverse effect on their businesses ▪ Improvement grants would not be considered for properties outside the zone ▪ Allowing de-registration of Coronation Street and, therefore, decreasing the numbers of tourists in this Central Holiday Area, would seriously affect the numerous cafes, gift shops and other tourist related traders in this area ▪ The continuing and deliberate de-generation by this Council to parts of Blackpool that were once extremely busy holiday trading areas must be stopped. <p>Letter 1: It would appear that the Council in trying to ease the problem of too many bedspaces have created another problem. Deregulating streets in order for hotels to be recycled is creating dangerous voids. No one seems to have considered the ghettos which would develop when these voids are created. Coronation Street sits at the top of Albert, Hull, Vance and Reads Avenue. All our guests see the road when they come here. I dread to think what they will see if Coronation Street remains omitted from the hotel zone. We need Coronation Street to be brought back into the hotel zone if we are to have any chance of survival. If Coronation Street is ghettoised there will be no guests staying there.</p> <p>Letter 2: Leaving Coronation Street out of a holiday zone will slowly deteriorate the street, and slowly but surely flats will destroy our hotel and also other businesses alike.</p> <p>Letter 3: Protest to my hotel on Coronation Street being taken out</p>	<p>The key issues raised show there is confusion by some people about the policy approach. The Proposed Submission policy and supporting text has been amended to provide more clarity so that people are not misinterpreting the policy.</p> <p>The Council has also issued additional guidance on its website (www.blackpool.gov.uk/holidayaccommodation) to explain what the policy is trying to achieve along with wider Council initiatives, in terms of a better balance of quality homes and holiday accommodation to support more sustainable neighbourhoods, and also what the policy is able to specifically control in terms of future change of use.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<p>of the holiday zone. The permission for other hotels to be used as HMOs is appalling and detrimental to the holiday area. Why are you still giving permission for hotels to be built? Why are you still giving permission for HMOs?</p>	
	<p>7 letters received from Leopold Grove, Alfred Street, Albert Road and Adelaide Street</p>	<p>1: Support the inclusion of Leopold Grove, Alfred St, all of Albert Road and Adelaide Street in the holiday zone.</p> <p>2: Request that Leopold Grove is returned to the holiday zone. It is incomprehensible that a street so close to everything in Blackpool has been removed from the holiday zone.</p> <p>3: Being on the back door of the Winter Gardens seems to be a reasonable fact that the area would be first in the queue of the holiday zone system. We can't understand who would think not to put us in the holiday area we would like you to make sure that we are replaced into the holiday area as soon as possible.</p> <p>4: Concerned about Leopold Grove being omitted from the central holiday zone/hotel zone and about the holiday / hotel zone boundary always being moved and us as well as many other established accommodation providers not being included within these boundaries. It may seem unimportant to some businesses where they are located but we pride ourselves as being very lucky to be located where we are. The area around The Winter Gardens thrives all year round and to include "the central holiday zone" as part of our advertisement is very important to us. With Blackpool bringing in so many accreditations that many accommodation providers cannot follow or join, it would be nice to know that we can be part of one very important title that needs nothing more than out location.</p> <p>5: Support the campaign to reintroduce the main holiday</p>	<p>In summary, these letters request additional properties on Leopold Grove, Alfred Street, Albert Road & Adelaide Street to be included in the South Town Centre Main Holiday Accommodation Area.</p> <p>The issue regarding the chosen areas or the detailed boundaries of those areas is not a matter for the Core Strategy, as these are defined in the supporting Holiday Accommodation SPD which was subject to consultation. Any change can only be considered through a formal review of the SPD and must be supported by evidence. The Proposed Submission policy no longer identifies the general areas to give more flexibility should we undertake an SPD review.</p> <p>These letters show there is confusion by some people about the policy approach. The Proposed Submission policy and supporting text has been amended to provide more clarity so that people are not misinterpreting the policy.</p> <p>The Council has also issued additional guidance on its website (www.blackpool.gov.uk/holidayaccommodation) to explain what the policy is trying to achieve along with wider Council initiatives, in terms of a better balance of quality homes and holiday accommodation to support more sustainable neighbourhoods, and also what the policy is able to specifically control in terms of future</p>

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		<p>boundaries, as set in 92/93 by public enquiry. That is to include the full length of Adelaide Street, Leopold Grove and the full length of Albert Road. Being able to promote our business as within the main holiday area is important to us hoteliers.</p> <p>6: Why have us spending our hard earned fund to upgrade if afterwards you were planning to kick us out of the holiday zone. How can we afford to change use to a private house? How can you say 'too many bedspaces in Blackpool' yet another hotel is being allowed to be built in the next part of Leopold supposedly out of the holiday area. We agree some parts of Blackpool need pulling down, or change of use, but not a street in the centre of town, between two main streets. We hope you have a change of heart and allow us to continue trading as a guest house.</p> <p>7: Support the proposal to include Leopold Grove, Alfred Street, Albert Road & Adelaide Street in the new holiday zone. The new holiday zone is already having an affect on the businesses that have been excluded, with reports from local commercial agents that sales of properties have fallen through. No doubt the value of our business will further reduce in an already difficult market.</p>	<p>change of use.</p>

Chapter 8: Enabling South Blackpool Growth and Enhancement

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
Comments on Introductory Text			
064	Bourne Leisure	At least part of the Marton Mere Holiday Park is included within the South Blackpool Growth Area. This is inappropriate given the existing holiday park operation, and therefore request that the park is excluded from the boundary identified in figure 18.	Figure 18 has been amended to provide clarity on the sites which comprises 'South Blackpool Growth and Enhancement'. To clarify, this does not include the holiday park.
067	Phillip Carter, Environment Agency	<p>Para 8.4: Blackpool Council chairs the Fylde Peninsula Water Management Group (FPWMG) which is tasked with driving forward an integrated approach to surface water management. Request the Core Strategy makes reference to this group to show that the formulation of planning policy and the delivery of development is linked to the aims and objectives of the FPWMG.</p> <p>It is recognised that there are existing capacity problems with the surface water network and sewerage water network in Blackpool. However, there is no reference to any refurbishment of existing systems and/or remediation works to alleviate capacity problems at this stage of the plan, other than a commitment that the IDP will be produced in advance of the pre submission version.</p>	<p>Reference to the FPWMG has been included in the supporting text to Policy CS9. It is not considered necessary to repeat the reference under paragraph 8.4</p> <p>Reference is made to surface water and waste water management under Policy CS9 Water Management and its supporting text. These issues are also comprehensively covered in the Infrastructure and Delivery Plan which will be published alongside the Core Strategy Proposed Submission when the plan is published for consultation. It is therefore not considered necessary to repeat this detail here. However, cross reference to Policy CS9 Water Management has been inserted for clarification.</p>
077	Fylde Borough Council	<p>Para 8.3: Prefer wording that more closely mirrors the agreed wording in the Fylde Coast Memorandum of Understanding (MOU). Although the MOU provides the basis for ongoing cooperation and collaboration on the strategic priorities for land on the edge of our boundaries, specific details such as plans for a sustainable extension to the Blackpool urban area have not been agreed between the parties.</p> <p>Figure 18 shows a dotted line outside the Blackpool boundary in Fylde. To avoid confusion, if this denotes lands at the edge of Blackpool that support proposals in Blackpool but are located in Fylde, this should be made clear both in the text and on the map.</p>	<p>Subsequent to the representation being submitted, the MOU was agreed by all 4 authorities in Autumn 2013. Within the final MOU reference is made to '<i>a sustainable urban extension</i>' with respect to land on the edge of Fylde and Blackpool. That said some minor amendments have been made to paragraph 8.3 to more closely reflect the wording of the MOU.</p> <p>Figure 18 has been amended to provide clarity on the sites which comprises 'South Blackpool Growth and Enhancement'. To clarify this does not include land in Fylde with the exception of Whyndyke.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
Policy CS25: South Blackpool Employment Growth			
Policy Comments			
022	Mrs Rooney	New business development in these areas is essential for Blackpool to achieve economic growth because the tourist industry, as a sole means of employment, is no longer a viable option. Therefore, I support this policy.	Support noted. Whilst tourism will remain one of Blackpool's key employment sectors, the policy supports a more robust, sustainable and diverse local economy.
062	Mr Andrew Yuille, CPRE	The policy should support in principle proposals at sustainable brownfield locations within South Blackpool that complement rather than compete with sites further north in order to clarify their relationship and help drive regeneration.	Employment growth opportunities in South Blackpool (within the Blackpool boundary) relate to existing employment areas by redeveloping sites or developing remaining employment land available. This will help to support wider employment opportunities and economic growth in Blackpool and the Fylde Coast Sub-Region.
064	Bourne Leisure	<p>There is an allocation for employment uses on the Preston New Road site where the Council will support, in principle, proposals for major new/redeveloped business/industrial development to support sub-regional economic growth. This site is directly opposite the Marton Mere Holiday Village. Proposals will need to be carefully assessed and if taken forward, designed in order to not detract from the amenity and enjoyment of the adjacent holiday village, nor cause unacceptable cumulative traffic impact.</p> <p>In this regard, 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.</p>	<p>The NS&I site is one of Blackpool's main employment areas and includes an existing allocation for B1 business use on remaining undeveloped land within the site. Opportunities to redevelop the site in principle, including this remaining land, are considered in the 2013 Employment Land Review (ELR) (published in 2014).</p> <p>Any future redevelopment proposals would need to be supported by appropriate assessments; and in assessing a proposal, the Council will consider various planning issues including access, amenity, impact on neighbouring properties and surrounding uses and highway safety.</p>
070	Mr Mike Hopkins, NS&I	Whilst the identification of South Blackpool as an appropriate location to attract new economic development is supported, it is considered that the evidence base which underpins the policy is out of date and unsound. The Council should critically re-examine their employment land portfolio given the ability of other land and premises available, particularly Whitehills Estate. Based upon a	The Council has updated its evidence base with regards to employment land with the 2013 ELR (published 2014). This provides an update on Blackpool's employment land supply position and future requirement, as well as a qualitative review of existing employment areas. It recommends that the NS&I site is retained as a main

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<p>market appraisal the prospects of delivering the entire NS&I Site for employment within the core strategy period is remote.</p> <p>Policy CS25(2) should recognise mixed use development on the NS&I site and provide a mechanism for its release for alternative higher uses, which will assist in redeveloping the existing site for high quality modern business facilities in a sustainable location.</p>	<p>employment area, but acknowledges opportunities for redevelopment, including constraints. In this respect, Policy CS3 does allow for some enabling development in exceptional circumstances to secure future employment uses where this is robustly justified and would not undermine wider Plan objectives. For clarity this is now also acknowledged in the supporting text to Policy CS25.</p>
068	CBRE	<p>Support the aspiration for sites within South Blackpool to be employment destinations. However, Policy CS25 should not preclude proposals for mixed-use development in this area, where these can be demonstrated to deliver sustainable economic development. In line with Paragraph 5.36, it should be recognised that enabling suitable mixed use development to be delivered on key frontages would provide a significant opportunity to act as a catalyst to facilitate regeneration and expansion of the wider area.</p>	<p>The evidence supports the retention of these sites for business/ industrial uses to help meet Blackpool's future employment need. Furthermore, South Blackpool is considered one of Blackpool's most sustainable and attractive locations for employment growth. Policy CS3 allows for some enabling development in exceptional circumstances to secure future employment uses where this is robustly justified and would not undermine wider Plan objectives. For clarity this is now also acknowledged in supporting text to Policy CS25.</p>
Supporting Text Comments			
060	Lancashire County Council	<p>Para 8.11 recognises the importance of Blackpool Airport and the need for development in the locality to support its growth. Given its strategic importance as a key economic asset and its potential to help attract new business and investors to Lancashire, I would urge a more positive planning approach to supporting its sustainable growth, one which would encourage opportunities in the vicinity of the airport for a broader mix of uses where these will act as enabling development, for more comprehensive employment-related development, to support the airport's ongoing viability and growth.</p>	<p>Blackpool Airport Corridor is identified as a strategic location to support sub-regional employment growth in the Duty to Co-operate Memorandum of Understanding. In view of its strategic significance, the three Fylde Coast authorities and LCC will work together with the owners to promote sustainable development and ensure a future Masterplan delivers an outcome that sustains the airport as a major economic asset. The Blackpool Core Strategy supports appropriate airport related development to support the sub-regional economy. However, as the airport lies outside the Blackpool boundary, any future development here will be directly determined by Fylde Borough Council.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
Policy CS26: South Blackpool Housing Growth			
014	Angelia Hinds	<p>What effects will the granting of planning permission for 83 new homes at Runnell Farm and 1150 on land at the Queensway have on joint provisions of the 'necessary infrastructure' by Blackpool and Fylde councils?</p> <p>Will the Core Strategy be amended to reflect these new developments and their impacts? What effects will the developments mentioned above have on the comprehensive drainage plan required by the Environment Agency and United Utilities? Again, will the Core Strategy be amended to reflect these new developments and their impacts? Section and Figure 18 - will these be updated to reflect the planning permission given to develop land at Runnell Farm?</p>	<p>The infrastructure requirements with respect to the Runnell Farm development and the 1150 dwellings on land at Queensway were taken into account at the planning application stage by Blackpool and Fylde Councils respectively. This includes the impact the developments would have on drainage.</p> <p>Blackpool Council is currently preparing a surface water management plan to understand the surface water flood risk and develop solutions to manage it. Further detail regarding surface water and waste water management is contained in the Infrastructure Delivery Plan published at the Core Strategy Proposed Submission stage.</p> <p>Local Planning Authorities are required to address cross boundary issues through a Duty to Co-operate. The three Fylde Coast Authorities and Lancashire County Council have agreed a Memorandum of Understanding to address such matters including surface water and waste water management.</p> <p>The granting of planning permission for 83 homes at Runnell Farm by the Planning Inspectorate has been taken into account in the housing supply provision in the Proposed Submission document.</p> <p>With respect to Fig. 18, the permission at Runnells Farm is not considered to be of strategic significance to be included in the figure. Whilst it will not be shown in the figure it has been included in the Strategic Housing Land Availability Assessment (SHLAA) 2013 update.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
054	Mr Simon Artiss, Bellway Homes	Support a policy that addresses Whyndyke Farm (within Fylde BC) but will seek to ensure the avoidance of double counting as it forms part of your housing strategy Fylde BC must not count it as part of their own (only at Issues & Options stage); Policies CS26 and CS27 as indicated (eg. Para 8.16) these areas should be examined to see if further release for housing can be achieved (either in the Core Strategy and/or Site Allocations DPD). Equally, the plan (and SHLAA) must be realistic about rates of delivery from these sites over the plan period.	<p>With respect to Whyndyke Farm, only 150 dwellings are included in the housing figure in the Blackpool Core Strategy which relates to the number of proposed new dwellings on land at this location within the Blackpool Borough Boundary.</p> <p>An assessment of potential housing sites has been undertaken and those sites contributing to Blackpool's future housing provision are set out in the 2013 SHLAA update. Any future development on remaining lands at Marton Moss will be determined through the neighbourhood planning process as set out in Policy CS27.</p> <p>The capacity for housing development around Junction 4 of the M55 forms part of the Duty to Cooperate between the three Fylde Coast authorities and LCC.</p>
057	Closelink Ltd	The identification of land at Whyndyke for housing development is strongly supported. This land forms part of a larger site that will provide a sustainable urban extension with close links to the existing Blackpool built up area which will be of benefit to existing and future residents alike.	Support noted.
062	Mr Andrew Yuille, CPRE	The policy should explicitly state that further housing development beyond the 600 homes already given permission and the 150 applied for at Whyndyke Farm will not be supported, unless they are brought forward as part of the neighbourhood planning approach for Marton Moss, or in exceptional circumstances as part of a mixed-use developments on existing employment sites, as per para 5.36. This is vital both to protect the character of the area and to avoid undermining regeneration ambitions.	Policy CS26 positively identifies land at Mythop Road and at Moss House Road for housing development. Future development on remaining lands at Marton Moss will be determined through a neighbourhood planning approach as set out in Policy CS27. It is considered that Policy CS27 provides appropriate restrictions on development on the remaining lands of the Moss prior to the outcome of the neighbourhood planning process. Therefore it is not considered necessary to explicitly state that no further housing will be supported.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
067	Mr Phillip Carter, Environment Agency	In accordance with NPPF Technical Guide, it should be noted that part of the Whyndyke Farm site is located within Flood Zone 2 and a level 2 SFRA is required to demonstrate that development of this site is acceptable. The Level 2 SFRA only needs to demonstrate the satisfaction of an Inspector that there are no sequentially preferable sites available in Flood Zone 1 - it may be sufficient to include this as an additional paragraph associated with policy CS26. Measures to protect the site would need to be considered as part of a site specific flood risk assessment, and one has already been submitted to Fylde Borough Council as part of application 11/0221.	With respect to that part of the Whyndyke site that is within Flood Zone 2. This area is only a very small part (some 6%) of a much larger site, the majority of which lies within Fylde Borough Council. The scale of housing development proposed for the whole of the site can be accommodated without impinging on that area that lies within Flood Zone 2. Additional wording will be included in paragraph 8.14 to clarify this issue.
Supporting Text Comments			
022	Mrs Rooney	Paragraph 8.17. I hope that the drainage problems will be addressed because it is surprising that such issues have not been resolved before. This lack of adequate drainage in this area perhaps explains why the town centre is over crowded and in need of regeneration because development in this area has been restricted due to poor drainage which seems rather primitive in the twenty-first century.	Specific reference in Policy CS26 to surface water and sustainable drainage systems is direct recognition of the importance of this issue in the area. Blackpool Council continues to work closely with the Environment Agency and United Utilities on this matter. A Surface Water Management Plan is currently being developed by Blackpool Council to understand the surface water flood risk and develop solutions to manage it. Further detail regarding surface water and waste water management is contained in the Infrastructure Delivery Plan published at the Core Strategy Proposed Submission stage.
057	Closelink Ltd	The development of land at Whyndyke Farm will be an essential element of both Blackpool and Fylde's future growth. Given the scale of the site in total, the likely scenario is that development may take in the region of 20 years and given the scale of infrastructure improvements that are required, it is essential that this development commences as soon as possible in order to create a viable long term development in this area. Provided that it can be demonstrated that development can take place without compromising the ability of local service and utilities providers to	Comments noted. An application for housing development has been submitted to Fylde Borough Council. Negotiations with the applicant and Fylde Borough Council and Blackpool Council are ongoing to ensure sustainable development with appropriate infrastructure and local services.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		meet the needs of the existing population, there is no justification for holding back the development of this area in the short term. In respect of employment land, the development of the site will result in close integration with the existing employment areas on Clifton Road and at Whitehills in Fylde; ensuring development meets the requirements of sustainability engrained in the NPPF.	
Policy CS27: Marton Moss			
007	Mr Henry Cree	The only way to keep Marton Moss as "The Moss" is to build £500,000 - £1m properties on small individual plots of land, not a mish mash of cheap, flat pack housing which would, as a result indirectly lose all the characteristics of the moss as we know it. However, forming a committee from Moss habitants may go somewhere to carry some weight when draft proposals are being put forward.	Proposing a neighbourhood planning approach to this area as set out in Policy CS27 provides the community with the opportunity to directly influence the future for the remaining lands at the Moss and the most appropriate form of development. This may include some housing development, which supports the retention and enhancement of the Moss' distinctive character whilst at the same time adhering to the policy framework set out in the Core Strategy.
008	Mr Stephen Sharpe	I am in favour of a neighbourhood planning approach as opposed to the countryside development approach as I find the current planning rules (especially for my home and business) too restrictive. I have been refused planning permission to extend my house as planning have deemed my property as business only even though myself and my family live there.	Support for the neighbourhood planning approach is noted.
009	I Bamber	This consultation was a total waste of time - nobody to answer questions, no clear plans or indications of the proposal for the area.	The purpose of this consultation which included a specific event for the residents in and around the Moss was to establish whether residents were supportive of a neighbourhood planning approach to the remaining lands at the Moss. The consultation was not about detailed proposals for the area. The latter will be the next stage if the neighbourhood planning approach set out in Policy CS27 is found to be a sound way forward at examination.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
010	Mrs Anne Frith	We are in favour of controlled development on the Moss as long as it is done tastefully and tactfully with consideration to wildlife and not filling dykes in. Keeping the character of the Moss lanes. There should be no buildings above two storey.	Comments noted. The proposed neighbourhood planning approach would provide the community with the opportunity to influence the type of development which would be appropriate for the remaining lands at the Moss and which supports the retention and enhancement of the Moss' distinctive character.
011	Mrs Paula Marquis-Smith	I think its a good idea to be asking the neighbourhood their opinions and to be able to have an input into what and where development is decided.	Support for a neighbourhood planning approach is noted
012	Anne Lesniak	It is a good idea to involve the neighbourhood and would like to know of further meetings. Does the same apply to Fylde?	Support for a neighbourhood planning approach is noted. Communities within all authorities including those in Fylde have the opportunity to pursue a neighbourhood planning approach. Information on neighbourhood planning can be found at the following links: http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx http://locality.org.uk/
013	Kathryn and Tim Greenwood	I suggest the Council consults formally on the establishment of a neighbourhood forum.	Government has given the responsibility to local communities to establish neighbourhood forums, although the forums do need to be designated by the Local Authority as does the neighbourhood plan boundary. Information on neighbourhood planning can be found at the following links: http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx http://locality.org.uk/

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		<p>The revised Core Strategy should concentrate development and regeneration of central brownfield sites and instead of greenfield sites, given the number of empty dwellings already in existence and the declining population.</p>	<p>Reflecting the strategy focus on regeneration, the 2013 SHLAA update shows that the vast majority of supply (80% of all dwellings from identified sites in addition to the windfall allowance) is from the existing urban area. Also, the vast majority (60% of all dwellings from identified sites in addition to the windfall allowance) is from previously developed land. Population projections are taken into account in determining the number of new dwellings required, while bringing back empty homes into use is identified as part of the windfall supply.</p>
		<p>I would support a neighbourhood forum and would be prepared to be involved with it. I think that it would be helpful to organise a forum meeting specifically to discuss this issue and canvass local support and interest. We would like to know what kind of support the Council would offer to this group.</p>	<p>Government has given the responsibility to local communities to establish neighbourhood forums and develop neighbourhood plans. Information on neighbourhood planning can be found at the following links: http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx</p> <p>http://locality.org.uk/</p> <p>The role of the Local Authority is to designate the forum and the neighbourhood plan boundary. The Council also has to provide communities with assistance in the preparation of any neighbourhood plan. This can include the following: sharing evidence and information on planning issues; helping with consultation events; providing advice on assessments and evidence; providing advice on whether emerging policies in the neighbourhood plan fit with national and core strategy policies; helping the community communicate with external partners where required.</p>

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014	Angelia Hinds	I would be very interested in being part of a neighbourhood forum and assist with the production of a neighbourhood plan. If this is not the way the rest of the community would choose to go I would still be interested in being involved with the development of the site allocations document. Exactly what financial support would be provided by the Council for the forum?	<p>The government has given the responsibility to local communities to establish neighbourhood forums and develop neighbourhood plans. However, as the plans will have a statutory status they must be prepared following a formal process. Information on neighbourhood planning can be found at the following links including information on funding:</p> <p>http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx</p> <p>http://locality.org.uk/</p> <p>If a Site Allocations document is pursued the community would be involved in the consultation process and your request for involvement is noted.</p>
015	Joe Staples	If this new plan stops developers being able to appeal against local Councils decisions then this is worth doing. I would hate anyone else to be in the position I am in where the local council decision was overruled by the Government. As a community this area is unique and needs to be saved for the future. We must work together with the Council to stop the Government making decisions about our homes and families.	Comment noted
016	Mr Roger Jones	Are the planning committees/councillors aware of the increase in traffic flow both to and from St. Annes (Fylde) that all the extra housing will bring to Midgeland Road, School Road and Division Lane. There is currently a 7.5 tonnes weight limit which is not being observed even by local Council vehicles. Increased private traffic will make these much more dangerous and need for expensive repair and renewal. We have waited over 40 years since the M55 for relief.	It is unclear to which 'extra housing' the consultee is referring. If this relates to the permitted housing development at Moss House Rd., the traffic implications of the development will have been assessed at the planning application stage and any required traffic management issues addressed through conditions and/or a Section 106 agreement to mitigate the assessed impact.

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			<p>With respect to policy CS27 no additional housing is allocated on the remaining lands of the Moss except if any housing comes forward through the proposed neighbourhood planning approach.</p> <p>With respect to the current 7.5 tonnes weight limit being breached by some vehicles, it is suggested that contact should be made with the Council's highway department to discuss the issue.</p>
017	Miss S Morrell	I agree to a neighbourhood planning approach. I do not agree to mass housing developments. We would appreciate our opinions being taken notice of instead of being ignored.	Support for the neighbourhood planning approach is noted.
018	Mrs C Manton	I think that the sooner you build houses on Marton Moss the better. The area is no longer safe and is not the Marton Moss of 15 years ago. Allowing houses to be built will improve the area and make it a lot safer. I would like to be kept informed of any future meetings regarding housing plans in the Marton Moss area.	Comment noted. The proposed neighbourhood planning approach will determine the appropriate future development for the remaining lands of the Moss which supports the retention and enhancement of the Moss' distinctive character, identifying in what circumstances development, including residential, may be acceptable.
019	Mr Gordon Halliwell	Blackpool South has no park and ride provision to encourage the use of public transport into town centre facilities. The Starr Gate tram terminus lost this facility with the construction of the new depot. The building of high density housing would encourage better public transport provision for outlying areas of Marton Moss. What development is envisaged for the old Illuminations workshop site? Fylde Borough development of Pontins site would benefit South Shore Blackpool. Is there a neighbourhood forum?	<p>Currently Park and Ride is not practical or cost effective as the considerable start-up costs and costs of operation would outweigh any revenue generated. The situation may change when the Leisure Quarter development in the Town Centre comes forward. Policy CS28: South Blackpool Transport and Connectivity requires future development in the south of the borough to optimise connectivity through sustainable transport modes including public transport with improved rapid transport services with the town centre and improved pedestrian and cycle network provision.</p> <p>With respect to the old Illuminations workshop site, this site forms part of the new Foxhall Village housing</p>

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			<p>development which is being developed by Hollinwood Homes. Permission has been granted for 410 homes to be developed over a period of 10 years.</p> <p>Regarding a neighbourhood forum, the government has given the responsibility to local communities to set up neighbourhood forums. A neighbourhood forum has yet to be set up by the community for the remaining lands at the Moss. The Council will await the outcome of the examination of the Core Strategy before promoting discussions with the community. That said the community can at any stage come forward with neighbourhood plan proposals notwithstanding the examination. Further information on neighbourhood planning can be found at the following links: http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx http://locality.org.uk/</p>
022	Mrs Rooney	Restricting development and new dwellings for purely agricultural or horticultural purposes seems rather anachronistic and archaic as most of the market gardens have closed down and the land lies fallow with derelict greenhouses. Such a restrictive policy will not help to provide more executive homes to attract business people and help to regenerate Blackpool as more than just a tourist town. There are several locations on Marton Moss which could be tastefully developed without ruining its intrinsic character and help to raise the value of existing properties.	Policy CS27 proposes a neighbourhood planning approach to this area which provides the community with the opportunity to directly influence the future for the remaining lands at the Moss and identifying in what circumstances development, including residential, may be acceptable which supports the retention and enhancement of the Moss' distinctive character whilst according with the policy framework set out in the Core Strategy. It is only until such time that neighbourhood policy framework is adopted that a restrictive approach to development on the remaining lands of the Moss is in

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			place so as not to prejudice the outcome of the neighbourhood planning process.
023	Joe Chabba	<p>Raises concerns regarding the amount of consultation that has taken place and the change in the planning approach to Marton Moss. Land between Chapel Road and Progress Way from Midgeland Road to Cropper Road North is brownfield land and the Council should consider this land for housing rather than making a concrete jungle in the town centre or developing farmland. No retail should be built out of town centre if the Council want the town centre to revive. Land owners should have a say, not those who does not live in this part of Blackpool or those that don't have any landholding.</p> <p>In terms of future planning, we should think about our future children - do we want them to be brought up in a decent environment or in chicken boxes or the concrete jungle? I [have] lived in this part of town since 1986. I have not seen any farming taking place in this area between Chapel Road and Yeadon Way, from Midgeland to Cropper Road North, from Chapel Road to Progress Way. This is brownfield land and it is enough land to meet the target; rather than building concrete jungle or chicken boxes. Some nice houses should be built, like Cypress Point in St Anne's and if you ask those who own land...they all want this part to be built up if you start from Dickies Lane and Cropper Road North and build some decent houses with gardens, ponds and trees planted around the green land the rest of the Marton (<i>illegible</i>)after looking at this decent part will follow it.</p>	<p>The Council are proposing a neighbourhood planning approach to this area so the community can have the opportunity to directly influence the future for the remaining lands at the Moss and decide on the most appropriate form of development for the area. This could include housing development if this emerges through the neighbourhood planning process and supports the retention and enhancement of the Moss' distinctive character whilst according with the policy framework set out in the core Strategy. The need to undertake further consultation on a Revised Preferred Option was to respond to a number of factors including more up to date information regarding household projection statistics and the publication of the National Planning Policy Framework by government.</p>
024	Catherine Kitching	I would prefer the Council to prepare a Site Allocations and Development Management Documents and involve the local community to set local policies. I would not like the community to prepare a Neighbourhood Plan. I consider that the local community would tie themselves up in knots if have to prepare a	Comment noted.

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		<p>Neighbourhood Plan, despite guidance from professional planners, and could easily lose the sight of the 'wood for the trees'. 'Big Society' could work well for re-opening a library for example but it is a bad idea for Town and Country Planning. It is running before the community can walk and it is an example of daft modern politics leading the public into what government thinks the community would like but the public, despite their likely hidden strengths and yet unknown talents can be dangerously personally involved. Rhetoric over sense.</p>	
028	Mrs Baldwin	<p>The residents of the Moss want it left alone. There's already enough houses been built in this area. The only people wanting more houses are the ones who own the land and are selling it to greedy builders without any thought for the wildlife, the trees and the flooding which the Council says doesn't exist.</p> <p>Also the amount of traffic in this area is a nightmare and will only get worse if they build more houses. You won't rest until you have destroyed one of the nicest remaining areas in Blackpool. There are enough disgusting scruffy areas in Blackpool that could only be improved by rebuilding but no-one seems interested in those.</p> <p>The amount of traffic using Stockydale Road is getting worse day by day cutting through to Chapel Road, also, at certain times in the day it is almost impossible to exit Stockydale on to Midgeland Road, you cant continue to build more and more houses using the same roads. Its just an accident waiting to happen because of the volume of traffic backlog from Progress Way.</p> <p>Now you're proposing a new development on Runnell Farm which will exit onto Midgeland Road, adding to the problem. Also when the development at Moss House Road goes ahead the traffic will be at a complete standstill.</p>	<p>There has been a longstanding range of diverse views on the future of the Moss. Consultations have highlighted that there was some need for change but that this change should reflect and embrace as far as possible the open and semi-rural character and appearance of the Moss. Therefore the Council are proposing a neighbourhood planning approach to enable the community to develop a shared vision for the area and to shape and direct development which recognises and responds to the distinctive character of the remaining lands of the Moss.</p> <p>With respect to housing development at Runnell Farm, the Council refused the application, the applicant appealed and the planning Inspectorate allowed the proposal at appeal.</p>

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029	Mr and Mrs Barnes	<p>I would like to oppose the proposed developments on the following grounds which I feel are all based on common sense. I have lived in the area for forty years and throughout that time I have witnessed several serious instances of flooding which have become progressively worse. I was refused insurance cover by to national insurance firms due to the risk of flooding within my area code.</p> <p>I frequently have difficulty driving out of Stockydale Road due to the volume of traffic on Midgeland Road travelling towards the motorway. Drivers of heavy vehicles are advised to avoid Stockydale Road due to cars being parked on both sides of the road and the lack of access for cars using Stockydale Road to Chapel Road. Chapel Road is hardly wide enough for two small cars to pass although heavily used by forty blue lorries to transport various material to numerous gypsy sites. Although planning permission has been refused in the past, applications will continue to be made by building firms hoping to make a great deal of money by obtaining planning permission irrespective of the impact on the environment and local residents. Supporters of these applications, I find, are local builders or landowners hoping to make a killing. Whatever the outcome of these applications I hope that all the facts will be considered.</p>	<p>It is unclear as to what ‘proposed development’ the consultee is referring. Policy CS27 proposes a neighbourhood planning approach to the remaining lands at the Moss. This proposed approach provides the community with the opportunity to directly influence the future of the local area. This includes identifying in what circumstance development may be acceptable which supports the retention and enhancement of the Moss’ distinctive character whilst at the same time adhering to the policy framework set out in the Core Strategy.</p>
030	Mr Darren Smith	<p>I am in full favour of the neighbourhood planning policy. I live on Moss House Rd and the current framework appeared to have been forgotten when allowing the 570 houses to be built by Kensington Developments The existing policy makes no sense whatsoever. To say only residential properties will be allowed where essential to agricultural or horticultural purposes, when these businesses no longer exist makes a mockery of the system. Its time the system was changed and allowing the community to decide makes perfect sense. I am in favour of the forum system as the Blackpool Council planning department appear to favour major building contractors</p>	<p>Support for the proposed neighbourhood planning approach is noted.</p> <p>The Council are proposing a neighbourhood planning approach as set out in Policy CS27, to enable the community to develop a shared vision for the area and to shape and direct development which recognises and responds to the distinctive character. Information on neighbourhood planning can be found at the following links:</p>

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		<p>instead of allowing developments by creative community members with a vision willing to invest in a sustainable future.</p> <p>I own a piece of land and stables south of school rd and would invest in a property on the land if permission was granted. It seems apparent the land south of School Rd was ear marked for future development and this was the reason no development has ever been granted in recent years. The natural division between Blackpool and St Annes already exists, the sand hills, the airport and the sluice, so for Fylde Council to allow planning permission on one side of Division Lane and Blackpool Council not allowing any on the other side seems ridiculous. The Council have an opportunity to invest in the community as we are the same people who you are meant to represent. If residential properties were allowed in say one per half acre it would firstly stop major developers, would allow the unkempt scrub land and broken down greenhouses to be removed yet not damaging the land for the wild life and could become a lucrative area and attract wealthy people to the area and possible businesses. Blackpool Council could possibly re-invest the ten million pound loss of greenbelt land money received from Kensington Developments on the Moss land.</p> <p>The current planning infrastructure in place at this moment states “planning for a residential property will only be permitted where essential for agricultural or horticultural needs which obviously do not apply anymore. The plan also states that permission will be granted to the land for recreational purposes suitable for the area ie stables. Surely having existing planning permission for stables (horses) would come into the same category as essential for a residential property or are the planning department STILL making it impossible to gain planning permission for a residential property until this new option supposedly comes into force.</p>	<p>http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx</p> <p>http://locality.org.uk/</p>

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031	B D Taylor	The Residents Forum is a great idea because the planning laws on Marton Moss are out of date and very complicated.	Support for the proposed neighbourhood planning approach is noted.
032	Mr M Crotty	I give my support to the Residents Forum on the planning laws re Marton Moss. I do think this is the way to go as it is just being taken over by large building firms.	Support for the proposed neighbourhood planning approach is noted.
039	Mr John Maddock	It is difficult to see how a Neighbourhood Planning Process will achieve an overall planning strategy for the Moss. Assuming a boundary can be established for the area(s) in question, who will be allowed to contribute to the Process - residents, land owners, tenants, users within the boundary, those just outside the boundary and/or the general public? Within any agreed Neighbourhood Area, how can agreement be reached on any development which does not encompass the whole of that area? For instance, a small site may seek development for housing, which, if approved, will increase the land value possibly fifty fold. That development would prejudice other possible future development in that Neighbourhood Area and other owners would therefore be justified in seeking compensation. The only way I could see this working is for all the owners within a Neighbourhood Area to form a Company which would own all the land. Each owner would have shares in that Company, the number of shares related to the size of land ownership. This is probably a totally unrealistic option. It is difficult to think of a development outside the restrictions of the current Countryside Policy which would not raise this issue.	Information on neighbourhood planning and who is involved in the process and how it should be undertaken can be found at the following links including information on funding: http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx http://locality.org.uk/
040	Mr Vernon Lund	I would be in favour of a neighbourhood plan involving the Moss. It would give residents an input into any future developments. I still have worries regarding the flood water table on the Moss House Road development. If the access road from Moss House Road runs into Progress Way, I can envisage traffic back ups from Squires Gate Lane down to Midgeland Road. Also, if there is still	Support for a neighbourhood plan approach is noted. If you have a problem with the PDF files you are able to make an appointment with Development Management Team to view the plans for Moss House Rd and Runnells Farm at the Planning Department in the Municipal

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		access from Moss House Road onto Midgeland Road this will add to the chaos at the Midgeland Road/Progress Way junction. I did ask to see the final detailed plans of the Runnell farm and Moss House Road developments with the new access roads in situ. Rumours are rife in the neighbourhood where they are going to be sited.	Buildings in Blackpool Town Centre.
042	Elaine Plant	We think the neighbourhood forum is a great idea and would welcome the councils help in setting one up.	Support for the proposed neighbourhood planning approach is noted. Information on neighbourhood planning and who is involved in the process and how it should be undertaken can be found at the following links including information on funding: http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx http://locality.org.uk/
044	Ms Perry-Acton	I am in favour of the neighbourhood planning policy. I have lived on the Moss for the past 34 years residing at The Bungalow, Division Lane Blackpool. I recently moved from Midgeland Rd, south of School Rd where I lived for 24 years. I have owned land on Division and Midgeland Rd over the years and have applied for planning permission over the years. The reasons for refusals were always the same i.e: not in keeping with the area, council policies, or clauses. We should be stopping major developments and concentrating on family homes with large gardens for children to play in safety, attracting wealthy people into what could be a lucrative area, with possible businesses opening up.	Support for the proposed neighbourhood planning approach is noted.
046	Mrs Penelope Maddock	Option One Neighbourhood forum: <ul style="list-style-type: none"> Where are the geographic boundaries that will indentify appropriate forum members? 	In preparing Neighbourhood Plans the government have given the responsibility to local communities to establish neighbourhood forums and develop neighbourhood plans

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<ul style="list-style-type: none"> ▪ Who will decide those boundaries? ▪ Assuming all the residents within the neighbourhood boundary wish to apply for their land to be used for property development, how will fair handedness be achieved ensuring that properties exact their neighbours value across the board understanding that not all the land may be required for development? ▪ What role will the neighbourhood forum have in any planning development decision making? ▪ Will any new development include utilities infrastructure to existing residents? ▪ Is there any evidence nationally that would advocate for planning development to be driven successfully through a neighbourhood forum? <p>While consultation is important in any process for change and development essential to the support and success of a project, a forum approach inevitably will be driven by the personal interest of those most affected. It is unclear therefore if any consensus could be reached by this method. If by virtue of such a situation being the outcome it would be assumed that Blackpool Council will make the final decisions. I refer to the original core strategy and the amended core strategy in this regard, as clearly there is an intention to develop the area and 2nd option to be considered following this consultation. Therefore it begs the question as to the role of a neighbourhood forum and its appropriately representative participants.</p>	<p>if they so wish. Information to assist communities on neighbourhood planning and neighbourhood forums and their membership can be found at the following links: http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx http://locality.org.uk/</p> <p>With respect to utilities infrastructure this will be considered through the neighbourhood planning process for any proposed new development. However there may be some opportunity for existing residents to take advantage of any new utilities infrastructure where feasible.</p> <p>In addition to information on neighbourhood plans and forums, examples of successful neighbourhood plans can be found on the locality.org.uk website.</p> <p>The role of the Local Authority is that it has to formally designate the forum and the neighbourhood plan boundary. The Local Authority can also provide assistance to the neighbourhood forum, which can include: sharing evidence and information on planning issues; helping with consultation events; providing advice on assessments and evidence; providing advice on whether emerging policies in the Neighbourhood Plan conform with national and core strategy policies; helping the community communicate with external partners where required.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
048	Mr D K Greenwood	I own land and property on Division Lane and am in full favour of the neighbourhood planning policy. I think that the land south of School Road should be developed and built on but in keeping with the attractive properties in this area. I believe there is no likelihood of this land being used for agricultural or horticultural purposes in the future.	Support for the neighbourhood planning policy approach is noted.
049	Ms Janet Dillon	I am presently occupying land at the junction of Midgeland Road and Divison lane. LA508421. I have stables on the land and would like permission to build a property/properties in a way that would improve the area. I have lived worked and occupied land on Division lane for 35 years and am in full favour of the neighbourhood. I think local people should be involved and be allowed to develop this area sympathetically.	Support for the neighbourhood planning policy approach is noted.
050	M J Marriott	My father and I have owned land on Midgeland Road, south of School Road in excess of 30 years. I now run a traditional business of repair and restoration of horse drawn vehicles at our property adjacent to Midgeland Road. I have worked on the site for the past 15 years and would be in full favour of the neighbourhood planning forum. As in the future I would like to invest in developing my business further, and would like to see more residential property development within the area. And possibly a residential dwelling myself one day to enable me to work and live on the same site, and make it a family run business in the future. I also would be keen to put forward/view ideas for the development of the whole idea in question. Small communities can then benefit rather than the large development companies.	Support for the neighbourhood planning policy approach is noted.
051	Mrs Christine Hamilton	I attended the Public Meeting at South Shore Tennis Club and was very impressed with the new plans and with the way they were presented. I have lived on Marton Moss for nearly 30 years and am in favour of giving the local community a say in how their area should go forward in the future. A neighbourhood planning approach which takes account of the views of those people living in	Support for the neighbourhood planning policy approach is noted.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		the area would seem to be a very positive step The moss community have always been very protective of their neighbourhood and the introduction of a Neighbourhood Forum would indeed give locals a say in the future of where they live. The exhibition was very well run and all of the people that we spoke too were extremely helpful and informed.	
052	Mrs L E Cooper	I have worked in Marton Moss for the last 12 years, and in the future would like to live in the area. I feel the neighbourhood planning forum is the way forward. This gives people in the community a chance to have a say in the development of their area, rather than big development companies taking over. There are individuals that would invest, develop and be in keeping with the surrounding area.	Support for the neighbourhood planning policy approach is noted.
054	Mr Simon Artiss, Bellway Homes Limited	Policies CS26 and CS27 - as indicated (e.g. Para 8.16) these areas should be examined to see if further release for housing can be achieved (either in the Core Strategy and/or Site Allocations DPD). Equally, the plan (and SHLAA) must be realistic about rates of delivery from these sites over the plan period.	The issue of justifying Blackpool's housing requirement and identifying a sufficient supply of land is dealt with in the Council's response to comments received on Policy CS2. This also refers to updated evidence in the form of the 2013 SHMA, 2013 SHLAA update and 2014 Viability Study Report and how these have informed amendments to the Proposed Submission. As remaining land on the Moss is not required to meet housing requirements, Policy CS27 does not propose any housing development unless this emerges through the neighbourhood planning approach from the community.
055	Mr James Cuthbert/Helen Cuthbert	I offer my support to Neighbourhood Planning Policy. I have lived in this unique area for 30 years and have brought my children up here. My daughter has spent many happy years with her horses which were kept on land owned by myself and which I still have. It is my daughter's intention to return to the area to also settle and bring up her family. Many of the people who reside here also work and own businesses in the area. Sometimes this is hindered because they cannot progress due to Blackpool council denying	Support for the neighbourhood planning policy approach is noted.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<p>them development. I am talking about development in keeping with the rural atmosphere. It does appear at times that there are some rules for some and different rules for others. Even trying to get Traffic calming measures is a no go as the reply from the council is "not enough serious accidents recorded" to warrant these. The council need to see the death defying speeds that some of the vehicles travel at. Death only happens once. If the people who live here could have some input we may get rid of all the eyesores of broken down greenhouses and patches of wasteland that inevitably fill with rubbish. Wouldn't it be nice to see some really nice properties instead, as on the St. Annes side of Division Lane, that would still allow for the rural nature of the area thereby protecting the abundant wildlife that we have. Most of the larger plots of land are no longer used for market gardening. We all have to adapt to changes that are inevitable so let the people of Marton Moss. be part of the move forward. We live here and know the area better than anyone else.</p>	
059	Mark and Joanne Acton	<p>We are in full favour of the neighbourhood planning forum and agree to be members. We have lived on Division Lane for over 30 years. For the past 10 years we have owned a small CL caravan site set within over an acre. We are keen to be kept up to date and involved in any developments that could affect are local area.</p>	<p>Support for the neighbourhood planning policy approach is noted.</p> <p>In preparing Neighbourhood Plans the government have given the responsibility to local communities to set up neighbourhood forums and develop neighbourhood plans if they so wish. Information on neighbourhood planning and neighbourhood forums and their membership can be found at the following links:</p> <p>http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx</p> <p>http://locality.org.uk/</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
060	Lancashire County Council, Environment Directorate	The County Council landholding at Midgeland Farm is identified by the County Council as a site suitable for the Organic Growth Medium/Woodlands from Waste Project. LCC support Policy CS27 to protect the site for agricultural/horticultural use on the assumption that this includes a community woodland use as well. LCC Property Group would welcome the opportunity to feed into and get involved with any future Neighbourhood Planning for Marton Moss given our landholding at Midgeland.	Comments noted. With respect to agricultural/horticultural use, the proposed policy limitations are imposed until such time as the neighbourhood planning process is progressed by the community in neighbourhood plan, or by Blackpool Council through the Site Allocations Development Plan Document. Opportunity exists for Lancashire County Council to be involved in any Neighbourhood Forum for the area given your land holdings at Midgeland.
062	CPRE Lancashire Branch	We support this policy.	Support for the neighbourhood planning policy approach is noted.
066	Mrs Julie Lawn	I am in favour of the neighbourhood planning policy. I have lived on the Moss for the past 21yrs residing on Midgeland Road. I now own land on school road I have thought about applying for planning permission in the past but have been advised that the reasons for refusals were always the same i.e. not in keeping with the area, council policies or clauses. We should be stopping major developments and concentrating on family homes with large gardens for children to play in safety, attracting wealthy people into what could be a lucrative area, with possible businesses opening up.	Comments and support for the neighbourhood planning policy approach are noted.
073	Peter J Nuttall	I am in favour of the neighbourhood planning process, I do feel however, that some restriction should be put on objections from people outside the neighbourhood so that those not living in the area are not able to stop what the neighbourhood want in way of development.	Support for the neighbourhood planning policy approach is noted. In preparing Neighbourhood Plans the government have given the responsibility to local communities to set up neighbourhood forums and develop neighbourhood plans if they so wish. Information on neighbourhood planning and neighbourhood forums and their membership can be found at the following links: http://www.blackpool.gov.uk/Residents/Planning-

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			environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx http://locality.org.uk/
074	Mr and Mrs Cartmell	We do still not agree with the building policy that is going ahead down Moss House Lane at the back of Sovereign Gate. There are places in Blackpool that would benefit much more than this project which is determined. This project will put where we live on Sovereign Gate on a ring Road. Traffic on Common Edge Road, Progress Way and now another road wanting to be put at the back of us. The fumes alone affect my asthma and this will make it worse for me. I shall not be able to sit in the garden at all.	The comments in the representation relate to a housing development on Moss House Road which has already received planning permission.
076	Keith Gleeson, on behalf of Denmack Holdings	Development on Marton Moss should not be restricted to prevent the provision of housing. Sites to be considered for development should be - a) infill sites within or adjacent to existing residential areas, b) derelict and/or underused plots left by business closures. A neighbourhood committee representative group should form and present an outline proposal for consideration by the planning policy department. A council representative and the neighbourhood committee should agree on all aspects of the Marton Moss development plan. Any failure to establish a neighbourhood group should lead to a call for sites consultation to identify potential development sites.	<p>The Council are proposing a neighbourhood planning approach as set out in Policy CS27, to enable the community to develop a shared vision for the area and to shape and direct development which recognises the distinctive character of the area. The issues raised under points a) and point b) would be considered under the neighbourhood planning approach. Policy CS27 provides the community with the opportunity to directly influence the future for the remaining lands at the Moss and the most appropriate form of development. This may include some housing development, which supports the retention and enhancement of the Moss' distinctive character whilst at the same time adhering to the policy framework set out in the Core Strategy.</p> <p>In preparing Neighbourhood Plans the government have given the responsibility to local communities to set up neighbourhood forums and develop neighbourhood plans if they so wish. Information on neighbourhood planning</p>

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			<p>and neighbourhood forums and their membership can be found at the following links:</p> <p>http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx</p> <p>http://locality.org.uk/</p> <p>If the community do not pursue a neighbourhood plan then neighbourhood policy for the area will be developed through the Site Allocations and Development Management DPD.</p>
Supporting Text Comments			
022	Mrs Rooney	<p>Paragraph 8.20. A less restrictive policy to planning and development would be a sensible approach because some of the local residents are averse to change partly because they believe that restricting development to agricultural use is a way of preventing further development suggesting a 'not in my back yard' approach to planning. In order to help the area thrive, a less subjective approach which allows infill development and more detached housing in certain locations would enhance Marton Moss. Such developments could see an increase in the number of small holdings and self insufficiency life styles.</p> <p>Paragraph 8.21.Restricting development and new dwellings for purely agricultural or horticultural purposes seems rather anachronistic and archaic as most of the Market Gardens have closed down and the land lies fallow with derelict greenhouses. Such a restrictive policy will not help to provide more executive homes to attract business people and help to regenerate Blackpool</p>	<p>Comments notes. Policy CS27 provides the community with the opportunity to directly influence the future for the remaining lands at the Moss and the most appropriate form of development. This may include some housing development, which supports the retention and enhancement of the Moss' distinctive character whilst at the same time adhering to the policy framework set out in the Core Strategy.</p> <p>The restrictions in para 8.21 are only in place until the neighbourhood policy framework is adopted so as not to undermine the outcome of the neighbourhood planning process.</p>

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		as more than just a tourist town. There are several locations on Marton Moss which could be tastefully developed without ruining its intrinsic character and help to raise the value of existing properties.	
026	Mrs Jennifer Mason	The text doesn't explain what the Neighbourhood Planning Process and Local Policy Framework actually is. I have searched the rest of the documentation and can't find anything. I would like to be able to understand this in order to comment. There was a public exhibition arranged on 5th July, but I was on holiday and therefore couldn't attend. The pdf document on the exhibition is only 4 pages and has no further depth than the CS27 policy wording. Please can more detail be provided of what the process will actually involve ?	In preparing Neighbourhood Plans the government has given the responsibility to local communities to set up neighbourhood forums and develop neighbourhood plans if they so wish. Information on neighbourhood planning and neighbourhood forums and their membership can be found at the following links: http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx http://locality.org.uk/
039	Mr John Maddock	8.19 - The council has failed to prevent prohibited uses of land on the Moss when confronted with persistent and sometimes violent opposition by individuals. Other prohibited uses have arisen over a sufficiently long period to be deemed to have rights. These uses, exacerbated by developments in the surrounding areas have contributed to the decline in appearance of the Moss and the quality of life of its residents. The "distinctive character of the Moss" has been severely and adversely affected. 8.20 - My comments under Q6 relating to Policy CS27 apply. 8.21 - It is unfortunate that the M55 Hub Village proposals by the Council seem to have been shelved. I, and many others on Chapel Road were strongly supportive. Again the issue of "capturing land values" was, perhaps the only contentious item for us. 8.22 - The retention of existing wildlife habitats is important to the area and can be catered for by adopting a form of development including open watercourses, swales, islands of housing surrounded	Comments noted. There has been a longstanding range of diverse views on the future of the Moss. The various consultations that have been undertaken at the various stages of plan preparation have highlighted that there was some need for change but that this change should reflect and embrace as far as possible the open and semi-rural character and appearance of the Moss. Therefore the Council are proposing in Policy CS27 a neighbourhood planning approach to enable the community to develop a shared vision for the area and to shape and direct development which recognises and responds to the distinctive character. The issues relating to retention of existing wildlife habitats, green corridors and building materials and styles and accessibility issues would all be matters that could be included in the neighbourhood

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		<p>by green areas/corridors, and provision within the housing and the green areas for nesting/roosting of birds and bats.</p> <p>8.23 - As 8.22 and I would also like to see the variety of building in this area maintained and increased. The use of different building materials as well as styles would add to the diverse appearance of the area.</p> <p>8.24 - As 8.22</p> <p>8.25 - Although the Moss seems to have a magic appeal, especially to those living outside its boundaries, the current access is very limited. Development of the area could enhance public access and the general amenity of the Moss.</p> <p>8.26 - Development of the Moss could include more provision for walking, cycling and horse riding away from the roads which are not safe for the multiple use they are subject to at present.</p>	<p>planning process.</p>
076	Keith Gleeson, Denmack Holdings	<p>There is a strong resistance by a small group of residents to any development on the Moss whatsoever. Claims of retention of an area of character and natural beauty are not borne out by the fact that large sections of this area lie derelict due to the trend in market gardening. Continued failure of base business and a lack of investment to remedy this ongoing decline.</p> <p>Continued support by the Council of this misguided stance, as is the apparent intent of the Core Strategy, will exacerbate the situation and lead to a continued spread of dereliction and underuse of land that is more than capable of contributing to Blackpool's housing needs.</p> <p>The intention to involve the community is certainly advisable, but only if there is a fair representation of the widest section of those residents. At the Marton Moss Consultation meeting held on the 5th July 2012, comments from those attending certainly indicated that there is as much, if not more support for selective</p>	<p>There has been a longstanding range of diverse views on the future of the Moss. The various consultations that have been undertaken as part of the plan preparation process have highlighted that there was some need for change but that this change should reflect and embrace as far as possible the open and semi-rural character and appearance of the Moss. The proposed neighbourhood planning approach enables the community to develop a shared vision for the area and to shape and direct development which recognises and responds to the distinctive character. If the local community does not come forward to develop a neighbourhood plan the neighbourhood planning approach will be developed through the site Allocations and Development Management DPD.</p> <p>In preparing Neighbourhood Plans the government have</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<p>development as there is resistance to any development at all on the Moss. It is imperative that this view is put forward within any new strategy documentation, and that planning policy in respect of housing in Blackpool takes account of the wider localised viewpoint, rather than media headlines driven by political aims that wrongly indicate resistance to any development whatsoever.</p> <p>The appeal decision to approve the proposed Runnell Farm development is a clear indicator that development on the Moss is a realistic option for the supply of housing in Blackpool. Within the decision, compliance with the aims of the new NPPF were relevant considerations. On this basis, there is no reason why other similar developments should not receive support.</p> <p>There are many derelict and underused sections of land that are pocketed within existing basically residential areas. These areas already have the infrastructure and services to further support localised development and fully comply with sustainability criteria that are the basis of the NPPF.</p> <p>There is no reason why an option of selected housing development on Marton Moss should not be included in any Core Strategy. There is clear intent with CS27 that this should be resident led, with the proposal of a neighbourhood plan. Ideally the involvement of an active section of that community as previously outlined, will lead the policy and an agreed development plan can be then written in. In absence of any local involvement, there is then the option for the Council to appraise and include appropriate sites, potentially with a call for sites consultation that would give a realistic and locally driven indication of how Moss development could be agreeably achieved.</p>	<p>given the responsibility to the communities to set up neighbourhood forums and develop neighbourhood plans if they so wish. Information on neighbourhood planning and neighbourhood forums and their membership can be found at the following links:</p> <p>http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx</p> <p>http://locality.org.uk/</p> <p>The issue of justifying Blackpool's housing requirement and identifying a sufficient supply of land is dealt with in the Council's response to comments received on Policy CS2. This also refers to updated evidence in the form of the 2013 SHMA, 2013 SHLAA update and 2014 Viability Study Report and how these have informed amendments to the Proposed Submission. As remaining land on the Moss is not required to meet housing requirements, Policy CS27 does not propose any housing development unless this emerges through the neighbourhood planning approach from the community.</p>
078	Mr David Burgess	I recently attended a meeting at Midgeland Road tennis club with reference to the future housing requirements on Marton Moss. I	444 dwellings per annum was a previous target in the RSS, which was in the process of being abolished when

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		<p>was told that the government had recommended 450 new homes per year. The council was trying to amend to 300 per year. I questioned the council representative who was in attendance about the need for more housing in the area. She assured me the housing was needed for future growth in population. She also said the population was rising year on year. I have taken the trouble of checking the census report year on year from 1981. You will see from my attachment what I was previously told was incorrect. The truth is the population of Blackpool has been in decline year on year since 1981. Indeed there has been a reduction of 6.1% in this time. As such I would question the need for further housing expansion in the Marton Moss area or indeed any other area until this trend is reversed. I have attached the census report for you to check yourself. Please see section five "Population trends: comparisons between Blackpool, the Northwest region.</p>	<p>the Council published the Revised Preferred Option. The proposed 300 dwellings per annum was based on evidence of need available at the time. Since then, a new Fylde Coast SHMA published in 2014 has been prepared which considers updated evidence and recommends what Blackpool's future population and housing needs area over the plan period. This evidence of need has been considered in the updated Technical Paper (2014), along with other evidence including realistic delivery rates, to justify the proposed housing requirement figure in the Proposed Submission document.</p>

Policy CS28: South Blackpool Transport and Connectivity

Policy Comments

002	Mr David Boon	<p>The Blackpool South line is the whole key to regeneration, but only if it's original terminus at Central is rebuilt. The South line is the real profit earner & is being left to rot when it could & should be the premier line into Blackpool once again.</p>	<p>There are no plans for the Central station to be rebuilt. Policy CS28 requires a comprehensive public transport strategy based on the principle of building on and supplementing existing network within and to/from new development in South Blackpool.</p>
004	Mr Paul Nettleton, BAFURA	<p>Para 8.31: Support the upgrade the South Fylde line with the installation of a passing loop. This would see an increase to a half hourly service, as opposed to an hourly one currently.</p> <p>Doubts whether there would be any advantage in extending the tramway to (say) St. Annes, which could see the loss of three stations. Additionally there would be a change of mode from heavy to light rail, which is not seen as advantageous.</p>	<p>Support and comments noted.</p> <p>No planned options for the South Fylde Line include the loss of any stations. Use of light rail would enable shared street level running which provides some advantages to viability and running costs.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
043	Phillipa Clarke, Wyre B C	As acknowledged in para 8.34, the duty to co-operate requires joint working between Blackpool, Fylde and Wyre Councils regarding cross boundary transport issues. We consider it prudent for Blackpool, Fylde and Wyre Councils to work together with Lancashire County Council and the Highways Agency to plan for the effects of proposed development upon the highway network in the South Blackpool area.	A Memorandum of Understanding has been agreed by the three Fylde Coast Authorities and Lancashire County Council in response to the requirements of the Duty to Cooperate. The Memorandum of Understanding includes strategic issues related to the highway network.
060	Lancashire County Council	<p>LCC were involved in the discussions and consultation on the 2011 Marton Moss/M55 Hub - Traffic Impact Assessment (TIA) which was prepared as part of the evidence base to support the options being considered within Blackpool's Core Strategy. A number of the individual sites assessed within this TIA report relied on broad assumptions and this has an inherent weakness. However, LCC considered the approach was acceptable for the overall scope of this Transport Report and its stated purpose as an evidence base for the developing LDF and Core Strategy. In Section 8.3 of the report it considers the potential for Smarter Choices Interventions to reduce future vehicle trips. In the report it states, 'there remains a considerable amount of uncertainty as to what scale of reduction can be expected' from these Smarter Choices Interventions. LCC agree with this statement and add that it is therefore critical that high quality sustainable travel options are developed linked to strong Travel Plans.</p> <p>The issues with regards to north-south movements on the existing highway network will require careful consideration with regard to growth and development site traffic from sites coming forward within south Blackpool. There are a number of existing traffic issues within and through Staining and other rural areas, which need to be fully taken into consideration when assessing the highways and transportation aspects of large development proposals in this area. Staining currently suffers from a noticeable level of rat running</p>	<p>Comment noted. The council works within the Fylde Coast Strategic Transport Group and the Lancashire Local Transport Body to ensure transport co-ordination within the borough and the wider region.</p> <p>The Council acknowledges that there is uncertainty on the ability of "Smarter Choices" to deliver high levels of change. However, the Council is active in developing initiatives within this and the Core Strategy policy CS5 has strong support for the development of sustainable transport options. The policy requires the submission of a Travel Plan where development will lead to an increase in transport movements. The Council also leads a Travel Plan Partnership that can be used to develop and monitor the effectiveness of travel plans.</p> <p>Major applications will require the submission of detailed transport assessments which will need to be considered by the relevant highways authorities.</p>

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		<p>through the village in peak periods with traffic using Staining Road and Chain Lane to avoid congestion on the primary distributor roads between Blackpool and the M55 Junction 4 (and beyond).</p> <p>The M55 to Heyhouses Link is a necessary link in improving communications between the north and south of the coastal urban area between Lytham St Anne's and the Strategic Road Network. An important element of the scheme includes provision for sustainable transport. The Secretary of State announced in June 2012, that planning permission for this scheme and the large Queensway housing development in Fylde (which will fund the link road) was to be granted. It must be noted that if development sites come forward in advance of Queensway, that indicate a considerable impact in the M55 link corridor, then the need for these developments to support the delivery of the link must be considered.</p>	<p>Its is considered that, due to the scale of development to come forward in Blackpool over the plan period, it is unlikely to impact on the M55 Heyhouses Link which is situated in Fylde.</p>
062	Mr Andrew Yuille, CPRE	<p>Point 1 should state that "Future development proposals in South Blackpool will be required to optimise connectivity by sustainable modes between homes, jobs and supporting community facilities." It is not clear how "Improved...parking" for the airport is a principle which would underpin a "comprehensive public transport, pedestrian and cycle improvement strategy". We support the need for the delivery of such a strategy and improved accessibility to the airport by sustainable modes, but so not support increases in parking provision. The strategy needs to encompass movement within South Blackpool, between South Blackpool and the rest of the urban area, and to the strategic transport network.</p>	<p>Point 1 of the policy revised accordingly.</p> <p>Part 2 of the policy revised to emphasise integration of the airport with sustainable modes of transport.</p> <p>There is, however, a need to provide a balance of sustainable transport modes whilst planning car parking provision for new economic development within South Blackpool. In this context it is considered reasonable to retain wording to improve parking provision at the airport.</p> <p>Policy CS5: Connectivity, seeks to reduce the need for car use.</p>

Additional Comments

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
020	Mr Malcolm Hicks	In agreement with the revised preferred option and looks forward to hearing from the Council in the future about how the Local Plan is progressing.	Support noted.
036	Mr Kevin Waters, Gladman Care Homes - T/A Adlington	<p>Gladman Care Homes Ltd (GCH) (T/A Adlington) specialise in the development of specialist older person accommodation and are currently developing a number of schemes with care provided by Methodist Homes for the Aged. GCH are keen to ensure a sound policy position is established should any potential development opportunities arise during the plan period and to ensure that the planning policy properly reflects the evidence base documents.</p> <p>From the demographic profile and future population projections for the area there is a current and rising future need for specialist accommodation with care for older people. It is of paramount importance that this is properly planned for and included within specific policies alongside those for other types of residential accommodation within the Core Strategy in order to provide an adequate mechanism to ensure delivery to this group of older people, who would otherwise not be provided for.</p> <p>Specialist housing with care for older people provides choice to adults with varying care needs and enables them to live as independently as possible in their own self contained homes, where people are able to access quality, flexible support and care services on site to suit individual needs (including dementia care). Such schemes differ from traditional sheltered/retirement accommodation and should provide internally accessible communal facilities, reception and care managers office and staff facilities. Ideally a range of a 1,2,3 bed apartments should be provided; and schemes should comprise 50-70 apartments.</p>	<p>Saved Policy BH24 of the current Local Plan (2006) supports specialist residential accommodation uses in appropriate locations in the Borough. The need for such accommodation is evidenced in the Fylde Coast SHMA and the content of this saved policy will be reviewed in undertaking a Site Allocations and Development DPD to ensure an appropriate policy is proposed.</p> <p>Reflecting the future needs of Blackpool's older population, the supporting text to Policy CS12: Housing Mix, Density and Standards has been amended in the Proposed Submission to specifically refer to opportunities to consider including Lifetime Homes standards in developing new local housing standards.</p>

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		<p>A policy should be included within the Core Strategy as follows: <i>"The provision of purpose built and/or specialist accommodation with care for older people in sustainable locations will be supported in every settlement with more than 10,000 population. Schemes should also be considered in other sustainable settlements where there is proven need. Apartments should be restricted for occupation by only those with care needs, include minimum compulsory care packages, should also include age restrictions and an extensive range of communal facilities. Schemes are expected to be promoted in partnership with an on site 24/7 care provider to safeguard the delivery of care and support to residents. Such schemes fall wholly within the auspices of C2 use, meet an otherwise unmet need for specialist accommodation for older people, deliver care and communal facilities and will not therefore be required to contribute towards affordable housing".</i></p> <p>Additional reference to the need for this type of accommodation has also been identified in the Fylde Coast SHMA 2008 (Chapter 8) and the Core Strategy should reflect the evidence base.</p>	
037	Ruth Paisley, Blackpool & Fylde College	<p>Throughout the document there is a potential to expand the impact of education and skills on the prosperity and aspiration of the local community. This will in turn help address some of the issues the strategy is responding to.</p> <p>Objectives 3 and 12 could be expanded upon. Also, there is excellent post 16 provision in the borough at the local FE (Blackpool and the Fylde College) and 6th Form colleges and the University Centre in Central Blackpool. More could be made of these assets and their impact in the strategy, in particular the reference at 5.45 to the University Centre.</p> <p>The college would ask that all new build and major conversion</p>	<p>Reference is made throughout the Core Strategy to the desire to improve the access to all educational facilities</p> <p>Objective 12 has been amended to include reference to improving aspirations.</p> <p>Core Strategy Policy CS3 supports the development of an</p>

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		<p>approvals include a requirement for that contractor to take on local apprentices to support local people (particularly those looking for their first job) into employment.</p> <p>The strategy is very well written and reads well and is a positive statement of intent for the Borough.</p>	<p>effective skills agenda. Opportunities to deliver this are set out in the Blackpool Local Economy Action Plan, the Council Plan 2013-2015 and the Lancashire SEP (as well as the emerging local Growth Accelerator Strategy). Specific programmes, including local labour/apprenticeships on development schemes, will be considered as appropriate in future strategies. There is also an opportunity for the Site Allocations & Development Management DPD to consider incorporating such a requirement.</p> <p>Comment noted.</p>
045	Amanda Grundy, Natural England	<p>The documents are clearly presented; appear to be underpinned by robust social, economic and environmental evidence; and consistent with relevant legislation, national and local policy, having been informed by a thorough review of plans and projects including the NPPF and those of neighbouring authorities.</p> <p>Welcome recognition of the need to address cross-boundary issues in a collaborative way, by ensuring Blackpool's Core Strategy aligns with the policy framework of neighbouring authorities, and cooperating with them on strategic planning issues as required by the duty to co-operate. This will be particularly important with respect to ensuring cumulative, in-combination or other effects of the Plan do not impact on the integrity of European and national designated sites, most notably Morecambe Bay Special Protection Area (SPA), Ramsar and Site of Special Scientific Interest (SSSI), and the Ribble & Alt Estuaries SPA, Ramsar site and SSSI.</p> <p>Satisfied that the revised preferred option should provide a positive planning framework to address the issues facing the area and guide development to ensure it contributes to meeting the identified</p>	<p>Comments noted.</p>

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		<p>social economic and environmental requirements.</p> <p>The Sustainability Appraisal makes a number of well reasoned and positive recommendations that Natural England supports. We therefore strongly encourage the Council to incorporate the recommendations of the Sustainability Appraisal in the next stage of the Local Plan. Satisfied that incorporation of the additional policy wording recommended in the Habitats Regulations Assessment should ensure the implementation of the Plan does not result in a likely significant effect on European protected sites.</p>	<p>The recommendations of the SA and HRA were incorporated into the Revised Preferred Option and can be viewed on the Council Website as a separate document. The Council has carried out further SA and HRA at the Proposed Submission stage.</p>
047	Mr David Sherratt, United Utilities PLC	<p>Local planning authorities should work with other authorities and providers to:</p> <ul style="list-style-type: none"> ▪ assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and ▪ take account of the need for strategic infrastructure including nationally significant infrastructure within their areas. <p>To ensure key sites and strategic locations are deemed sustainable, plan-led and co-ordinated, strategic solutions should be developed and defined for supporting infrastructure. An example would be the development of a joint working group [lead by the LPA] that identifies a strategic drainage solution for each key site or strategic location. The joint working group will include the LPA; EA; infrastructure providers; developers; landowners and any other key stakeholders such as Natural England etc. The aim of the joint working group will be to develop a sustainable strategic drainage solution that protects the existing customer and maintains their service and quality of life; protects the environment; is robust and deliverable; is proactively delivered; meets the needs of the key sites/strategic locations but also the neighbouring LPA; and is</p>	<p>Comments Noted.</p> <p>Blackpool Council continues to work closely with United Utilities, the Environment Agency regarding issues around water, wastewater. The IDP assesses the quality and capacity of various types of infrastructure and is published alongside the Core Strategy Pre-Submission. The Duty to Co-operate requires the three Fylde Coast Authorities to work together of strategic cross boundary issues including water management and flood risk.</p> <p>There are various groups that have been set up to tackle drainage issues including the Fylde Peninsular Water Management Group and the Planning Sub-Group which includes representatives from Blackpool, Fylde and Wyre Councils, Lancashire CC, United Utilities and the Environment Agency.</p>

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		<p>conditional for future developments within the key site or strategic location.</p> <p>Future development must be sustainable; prevent environmental damage and preserve the quality of life for existing and future generations; therefore, developments should not be permitted until infrastructure capacity is available. United Utilities cannot confirm if capacity is available until the connection point/s, flows and completion dates are available.</p> <p>If additional supporting infrastructure is required then the LPA should work closely with UU [and other utility providers] to ensure a sustainable cross-boundary solution is identified and approved by the appropriate Regulators bodies before granting planning approval; failure may result in the deterioration of the community's quality of life or environmental damage.</p> <p>The scale and type of development needs to be defined so the appropriate infrastructure is in place to ensure growth is sustainable. United Utilities has a number of recent examples where infrastructure has been provided based on identified growth, but not delivered; this has resulted in major operational issues; the treatment process is under loaded; it is failing to operate because it cannot reach its operational capacity.</p> <p>Additional temporary engineer solutions are in place; this represents a significant risk to the existing customers; the environment and UU; not forgetting the additional financial burden on UU customers.</p> <p>The Council has a number of capacity issues; any additional developments in these or adjoining areas without firstly ensuring</p>	

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		<p>infrastructure solutions are implemented could result in an increased number and frequency of sewer flooding incidents.</p> <p>The Council should also consider the constraints [are not limited to, but include] that are outside the control of UU and may influence the timely delivery of supporting infrastructure:</p> <ul style="list-style-type: none"> ▪ Regulatory approval ▪ Environmental constraints <ul style="list-style-type: none"> - Does the receiving watercourse/environment have the capacity to accept additional flows without causing environmental damage? - Small river : large development ▪ Environmental consent and permits <ul style="list-style-type: none"> - Timescales involved in the construction/delivery of new processes to meet new consents or permits ▪ Planning approval <ul style="list-style-type: none"> - The LDF process has not highlighted or specified land for infrastructure use, therefore future planning applications for future supporting utilities infrastructure may be thwarted or a prolonged process - Historical local resistance to the expansion of utilities assets - Planning application approval restrictions/conditions delay implementation of supporting infrastructure assets ▪ Land acquisition <ul style="list-style-type: none"> - Timescales involved in the purchased land needs - Land may not be available for expansion due to the encroachment of development ▪ Access into the highway <ul style="list-style-type: none"> - Limitations from the highway departments for road works ▪ Environmental restrictions bird breeding or nesting seasons; 	

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<p>great crested newts; badgers etc</p> <ul style="list-style-type: none"> Implementation and commissioning restrictions Planning application approval conditions; working hours etc. Environmental consents/permits conditions Its physical delivery [Reason: Ensure timely delivery of development and infrastructure to protect the good quality of life and the environment] 	
053	Pat Francioni, Talbot PACT Meeting Sub-Committee	<p>Appendices: Local Plan reference BH2 (Talbot and Brunswick Priority Neighbourhoods) is not saved and replaced with CS11. This should be saved, as it also offers protection, and has in the past, for both Talbot and Brunswick Wards [Brunswick is not even mentioned in CS11] from attempts to force certain types of establishments into the area [Addaction is an example] which was upheld by the Secretary of State at the time as being detrimental to the area because it is heavily residential. This priority safeguard for Talbot and Brunswick must be retained in the new plan.</p>	<p><i>Figure 15: Location of Blackpool's Neighbourhoods</i> clearly shows the boundary of the Talbot Neighbourhood whose boundary remains as the Local Plan. 'and Brunswick' has been added in the policy and Figure 15 for clarity.</p> <p>For further clarity, <i>BH2: Talbot and Brunswick Priority Neighbourhood</i> policy will continue to be saved. The <i>'Talbot and Brunswick Integrated Neighbourhood Improvement Area – Neighbourhood Planning Guidance' (June 2006)</i> will continue to be a saved document.</p>
053	Pat Francioni, Talbot PACT Meeting Sub-Committee	<p>We recommend that the community be taken more seriously and their opinions be counted at least equally, if not more importantly, than officers opinions. We need to guarantee community engagement through established community groups, forums or ward PACT groups when plans are submitted that would have a significant impact upon the community or district. This could be triggered automatically when a commercial, health authority or Council redevelopment plan (see examples below), is proposed by sending information to the PACT chairman to report at the next meeting. In other circumstances when over 20 letters of concern/objection are received by the planning department about any a proposed development in any given area. This would apply to all wards, not just Talbot and Brunswick.</p> <p>a) hostels (various purposes) b) HMO's</p>	<p>The comments made here are with reference to the planning application process.</p> <p>All Core Strategy and Planning Application consultation is carried out in full accordance with government consultation regulations and the Council's adopted Statement of Community Involvement.</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<p>c) children's hostel/homes d) major residential building development e) redevelopment/demolition of former hotels and guest houses f) drug/alcohol treatment centres g) drug/alcohol rehabilitation centres h) compulsory purchase proposals.</p>	
056	Chris Henshall, Homes and Communities Agency	<p>The HCA contributes to economic growth by helping communities to realise their aspirations for prosperity and to deliver quality housing that people can afford, through an enabling and investment role. The HCA is keen to ensure that the vision and the 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.</p> <p>Through its regeneration and affordable housing programmes, and through the economic development activities of the former NWDA, HCA has made significant investments in a key range of projects particularly in the town centre and South Beach areas. Given the number and size of projects which it will particularly influence, the HCA will be an important delivery and enabling partners to the Council in achieving the intended outcomes of the Core Strategy.</p> <p>We are accordingly pleased to note that the Revised Preferred Option contains a range of policies that will help to support the appropriate future delivery of the schemes in which HCA will be involved. The Local Investment Plan (LIP) for the Fylde Coast (Blackpool, Fylde and Wyre) aims to clarify local objectives and priorities for capital investment in housing and regeneration in support of economic growth over the 2011-14 period. The document also helps to inform HCA's programme of investment and enabling support in the area. The LIP outlines thematic and</p>	Comments and support noted.

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		<p>spatial priorities for investment across the Fylde Coast.</p> <p>Of particular relevance to Blackpool, the LIP suggests spatial priorities around the Central Blackpool Approach and Town Centre. (Where 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 include 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 housing building to meet long term demand, including affordable homes. The key evidence and strategies informing the LIP (The Fylde Coast Housing Strategy, The Fylde coast Strategic Housing Marketing Assessment and the Fylde Coast Strategy Evidence Base), have also informed the production of the Core Strategy, and we would therefore expect to see a close match between the LIP and the Core Strategy. In terms of strategic approach. This is generally borne out in the Revised Preferred Option, and the HCA accordingly support the general approach taken.</p> <p>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 supporting the Council through the Agency's enabling approach. The HCA remains supportive of the Core Strategy process and looks forward to working with the Council to deliver and enable local priorities.</p>	

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060	Lancashire County Council, Environment Directorate	<p><u>Infrastructure Delivery - South Blackpool</u></p> <p>The County Council is responsible for delivering services within the Fylde district including highways, public transport, flood management, education and social care. Given that the preferred option being put forward seeks to encourage growth within Fylde, then there are significant implications in terms of the delivery of these services and functions. This is compounded by the areas poor accessibility.</p> <p>Taking into account that Fylde Borough Council is at an early stage of plan preparation and has yet to confirm whether development in that area is their preferred option, it is not clear at this stage if and when development will come forward at this location. From the County Council's point of view it is important that development comes forward in a co-ordinated way to ensure the satisfactory delivery of infrastructure. Should Fylde Borough Council identify growth in ' South Blackpool' as their preferred option, it is suggested that Blackpool and Fylde undertake a joint piece of work at the earliest opportunity to consider development along the Blackpool/Fylde boundary, particularly at/around J4 M55.</p> <p>Following the earlier work undertaken by David Locke Associates, I would suggest a revised master plan for the area incorporating the airport corridor to be carried out. This would need to take into account the housing and employment land needs of Blackpool and Fylde and the requirements identified in the Infrastructure Delivery Plans currently being developed by each authority. The involvement of the County Council in the development of any master plan or similar piece of work will be necessary to ensure this authority's services and functions are properly considered.</p>	<p>It is not considered that the Blackpool Core Strategy 'seeks to encourage' growth within Fylde. Blackpool Council continues to work closely with Fylde Council and Lancashire County Council through the Duty to Co-operate to ensure that the two Core Strategies and IDPs are broadly aligned. Any growth proposed in the Core Strategy relates solely to lands within the Borough boundary.</p> <p>The Council continues to work closely with Fylde to ensure that the two Core Strategies are broadly aligned. There are no plans for the preparation of masterplans at present, however a piece of work is currently being undertaken in order to better understand the development potential of land in the immediate vicinity of Junction 4 of the M55.</p>

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		<p>For all developments that will impact on Lancashire County Council's transport network, it is recommended that pre-application discussions are carried out between Lancashire County Council (LCC) and the developer at the earliest opportunity to ensure appropriate and relevant analysis is undertaken. This will enable the impacts of the development within Lancashire to be established and any necessary mitigation measures identified. Given the areas poor accessibility every opportunity should be taken to ensure people without access to a car are provided with high quality sustainable travel options so that they are both able and attracted to live in these proposed development locations. It is essential that all development is fully integrated into the existing built environment and linked to robust and deliverable Travel Plans with challenging, yet achievable targets.</p>	<p>Blackpool Council is keen to encourage developers to enter into pre-application discussion with LCC where there are potential impacts on the highway network.</p>
061	Diana Richardson, Sainsburys Supermarkets Ltd	<p>Sainsbury's suggest a thorough review of all policies to ensure that the golden thread of the NPPF; the presumption in favour of sustainable development, is fully reflected in the emerging strategy as a whole and not just referenced in Policy NPPF1</p>	<p>The policies in the Core Strategy Revised Preferred Option have all been prepared taking account of the National Planning Policy Framework.</p>
067	Mr Phillip Carter, Environment Agency	<p>Appendix C - In relation to objective 11, Lancashire Biodiversity Action Plan Species and Habitats are identified as indicators. However, what aspect of Lancashire BAP Species and Habitats form the indicator? Is it a loss of habitats/species? increase in species/habitats? The Indicator needs to be more clearly defined.</p> <p>Objective 20 relates to the South Blackpool area and Marton Moss and refers to changes in priority habitats and species and changes in designated areas in the South Blackpool Area. Although there are priority species in the South Blackpool area, we are not aware of any designated sites so it is unclear how the second part of that indicator would be of benefit.</p>	<p>Comments noted. The relevant sections of the Monitoring and Implementation Plan have been amended and the indicators clearly defined.</p>

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077	Fylde Borough Council	<p>The main points relate to the references within the document to South Blackpool. To avoid confusion the document should be clear when it is referring to South Blackpool land that is located within the Blackpool boundary and lands located in Fylde borough which are at the edge of Blackpool. The document at present reads as if a new location in Fylde has been created called 'South Blackpool'.</p> <p>Fylde Borough Council looks forward to continuing to work closely with Blackpool Council under the Duty to Cooperate, especially concerning strategic issues requiring cross boundary cooperation as set out in the Fylde Coast MOU. In particular, the Council would wish to be kept informed of progress on the Infrastructure Delivery Plan, which will be prepared for the Pre-Submission stage. Infrastructure provision, including water and wastewater facilities, is crucial to the deliverability of the Local Plan and has particular implications for development on lands at the edge of our adjoining boundaries.</p>	<p>Officers from Blackpool and Fylde BC discussed Fylde's response at a meeting held in October 2012. Fylde officers reiterated their concern with the South Blackpool term and how it is illustrated on the Plan. Wording and illustrative plans have been amended in the Proposed Submission to provide more clarity.</p> <p>At the meeting officers from Blackpool agreed to forward the draft Infrastructure Delivery Plan (IDP) to Fylde - having already sent it to Wyre – to ensure the three authorities Plans are consistent.</p>