

Mr L Fleming
FAO: Tony Blackburn
15 Ottawa Close
Blackburn
BB2 7EB

Date: 29 October 2021
Our ref: 04051/31/NT/FL/20304388v1
Your ref:

Dear Inspector

Blackpool Local Plan Part 2 Examination

On behalf of our client, Bourne Leisure Ltd. ("Bourne Leisure"), please find below representations in response to the Main Modifications and the Inspector's Matters, Issues and Questions to the draft Local Plan Part 2: Draft Site Allocations and Development Management Policies document.

Inspector's Matters, Issues and Questions

Matter 5 - Issue xiii

Question 1

Is the requirement in Policy DM17 for not less than four storeys high on the Promenade or in the Town Centre justified? Does the policy apply to development such as holiday parks?

It is considered that as drafted, policy DM17 is unsound and refer the Inspector to the representations submitted in response to regulation 19 consultation (appended to this letter).

Question 2

Is the requirement for a broadband statement set out in Policy DM18 necessary and justified? Is it reasonable to expect developers to make provision for full fibre broadband? Have these requirements been appropriately considered in the Council's viability assessment?

Bourne Leisure endorses Main Mod 09 to draft policy DM18 (High Speed Broadband for New Developments), in line with the representations submitted in response to regulation 19 consultation.

Question 4

Is Policy DM21 soundly based? Should criteria (e) form part of the Policy or its explanatory text?

It is considered that as drafted, policy DM21 is unsound and refer the Inspector to the representations submitted in response to regulation 19 consultation (appended to this letter).

Question 7

Is Policy DM25 justified? Have its requirements been taken into account in the Council's viability assessment?

It is considered that as drafted, policy DM25 is unsound and refer the Inspector to the representations submitted in response to regulation 19 consultation (appended to this letter).

Matter 5 - Issue xiv**Question 2**

Is Policy DM32 consistent with Policy CS10 of the CS and national policy? Are all the criteria effective?

It is considered the as drafted, policy DM32 is sound and refer the Inspector to the representations submitted in response to regulation 19 consultation (appended to this letter).

Question 5

Is Policy DM35 consistent with national policy? Does it take appropriate account of best and most versatile agricultural land, trees and woodland? Does it deal appropriately with biodiversity net gain? Have the requirements of Policy DM35 been fully considered in the Council's viability assessment?

Bourne Leisure endorses Main Mod 19 to draft policy DM35 (Biodiversity) in line with our representations submitted in response to regulation 19 consultation.

Question 6

Is Policy DM36 consistent with national policy, particularly paragraph 186 of the NPPF? Has the effect of proposals in the SADMP on air quality been adequately assessed? Should Air Quality Management Areas be identified in the SADMP? Is it clear when air quality impact assessment will be required? Overall is this policy soundly based?

Bourne Leisure endorses Main Mod 21 to draft policy DM36 (Controlling Pollution and Contamination) in line with the representations submitted in response to regulation 19 consultation.

Matter 5 - Issue XV**Question 1**

Is Policy DM41 soundly based? Are the parking standards and electric vehicle charging point requirements in Appendix D1 justified? Are the thresholds for transport assessments and travel plans in Appendix D2 justified? Have the requirements of Policy DM41 and Appendix D1 and D2 been considered in the Council's viability assessment?

It is considered the as drafted, policy DM41 is unsound and refer the Inspector to the representations submitted in response to regulation 19 consultation (appended to this letter). It is noted that the representations refer to draft policy 42, this was simply a typing error.

Summary

If you require any clarification or additional information, please let us know and we will be happy to assist. We would be grateful if you could keep us informed of any future consultation on this or other emerging planning documents



Yours sincerely

A handwritten signature in black ink, appearing to read "Rebecca Hilton". The signature is stylized and somewhat cursive, with a large initial "R" and "H".

Rebecca Hilton
Associate Director



**Annex 1: Representations submitted in response to the Local Plan Part 2:
Draft Site Allocations and Development Management Policies Regulation 19
Consultation**