

Matter 5 – Transport, Green Infrastructure, Water Management and Sustainable Design and Renewable/Low Carbon Energy (Policies CS5, CS6, CS9, CS10)

We have only responded to the questions that directly relate to the representations made by Blackpool Pleasure Beach.

Question 5.1: Is specific reference in policy CS5, or its supporting text, to a recognition that for some development there may be no alternative to car use, necessary to the soundness of the plan?

We set out in our representations to Policy CS22 why we considered that policies in the Plan should ensure the protection of car parking spaces, particularly those along the Central Corridor, which accommodate a large proportion of visitors arriving in Blackpool from the motorway network.

We do not consider that there needs to be specific reference in the policy itself to a recognition that there may be no alternative to car use. It would, however, be helpful to refer to this in the supporting text, particularly paragraphs 5.77 to 5.80. We set out the reasons why major visitor attractions of regional and national significance – particularly those that rely on family visits – are reliant on visitors travelling by car. In Blackpool’s case, the key issue is to get the visitors into Blackpool. Once in the town, there are numerous options for sustainable travel, and the Core Strategy puts forward a good framework to improve links between different parts of the resort by foot and public transport, including the recently upgraded tram network.

This point is important to the soundness of the plan because one of the main objectives of the Plan is to **“sustain a high quality, year-round visitor offer by growing and promoting our tourism, arts, heritage and cultural offer”** (Objective 14 of the Core Strategy (Goal 3)). It is therefore fundamental to the soundness of the Plan that all policies work together to achieve this objective. The visitor attraction sector relies on a relatively small number of key days (mainly school holidays and particularly Bank Holidays) for their viability and it is essential that all people who intend to visit an attraction on these days can get there. If there is a cap on visitors on these key days caused by reductions in parking capacity, then the viability of the attraction will suffer, which impacts upon its ability to operate all-year-round, and therefore its level of employment.

In our view the plan would not be sound if it does not contain a clear statement on this point, otherwise the Plan’s main objectives will not be met. The Plan would not be effective.

Question 5.2: Should policy CS5 (5) be limited to town centre parking? Does the policy, or the plan elsewhere, adequately address visitor parking outside of the town centre?

The approach that we set out in our representations was to request an amendment to Policy CS22. An amendment to Policy CS5(5) would be an alternative way of achieving the same outcome, and would probably be easier to understand for users of the Plan. Alternatively, both amendments could be made at the same time.

In Blackpool Pleasure Beach’s view, Policy 5(5) should not be limited to town centre parking only. It should also address visitor parking outside the town centre. Indeed, restricting it in this way (without an equivalent amendment to Policy CS22) suggests that parking outside the town centre is less

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important than parking in the town centre, which is certainly not the case for a resort where the visitor attractions are of national and international significance, but the retailing is of only regional significance.

The Pleasure Beach would prefer a clear statement that existing levels of public car parking will be maintained in future development proposals. The policy can be flexible enough to allow for parking to be reconfigured or relocated, but it is essential that this parking is well located in relation to the South Beach attractions of Blackpool Pleasure Beach, Sandcastle and South Pier, and that the links between the parking and attractions are easy to navigate, safe, attractive and direct.

We would suggest amending Policy CS5(5) as follows:

“5. Addressing town centre and resort parking capacity issues by providing sufficient, high quality and conveniently located car parks, to support the town centre and resort economy and address wider issues of parking provision across the Borough. Any change in parking provision as a result of development must not undermine the resort’s ability to accommodate visitor trips, and every development proposal must demonstrate how it will ensure no loss in the overall number of car parking spaces, and that any re-provision of spaces in a different location is as accessible to the major attractions as the provision that is being replaced. “

The final sentence of the policy could be moved into supporting text, but as an issue of such importance we would prefer there to be a clear statement within the policy itself.

This would be an alternative to the proposed similar amendment to Policy CS22 and would resolve that objection.