

Blackpool Local Plan Part 1: Core Strategy Representations received to the Main Modifications consultation

October 2015

Blackpool Council



Contents

Respondent Number	Respondent	Page
1	Fylde Borough Council	1
2	Wyre Borough Council	2
3	United Utilities	3
4	Natural England	4
5	Historic England – Comments on the Main Modifications and Sustainability Appraisal	5
6	Home Builders Federation	9
7	Barratt Homes	17
8	The Theatres Trust	18
9	The Princes Regeneration Trust	27
10	RPS Planning on behalf of Blackpool Pleasure Beach	28



Ms J Saleh
Planning Policy Manager
Blackpool Council
Built Environment
PO Box 17
Corporation Street
Blackpool
FY1 1LZ

Our Ref:

Your Ref:

Please Ask For: Mr M Evans

Telephone: 01253 658460

Email: mark.evans@fylde.gov.uk

Date: 2 October 2015

Dear Ms Saleh,

RE. BLACKPOOL LOCAL PLAN – PART 1: CORE STRATEGY – INSPECTOR’S PROPOSED MODIFICATIONS

I am writing to you following your email of September 2015, regarding the Inspector’s proposed modifications to the Blackpool Core Strategy

Fylde Council raises no objection and have no comments to make to the proposed modifications to the Core Strategy. From a Fylde Council perspective, it is considered that the Core Strategy does not raise any issues relating to legal compliance, nor soundness.

If you require any further information, please do not hesitate to contact me on Tel. 01253 658460.

Yours sincerely

A handwritten signature in black ink, appearing to be "Mark Evans", written in a cursive style.

Mark Evans
Head of Planning & Regeneration



Together we make a difference...

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

Ask for: Len Harris
Email: len.harris@wyre.gov.uk
Tel No: 01253 887231
Our Ref:

Date: 30 September 2015

Dear Jane

Thank you for the opportunity to consider the Blackpool Core Strategy Schedule of Proposed Main Modifications dated August 2015. I can confirm that the modifications proposed raise no concerns for Wyre Council regarding legal compliance or soundness.

Yours Sincerely

A handwritten signature in black ink that reads "L. Harris".

Len Harris

3 – United Utilities

From: Gaskell, Gemma <Gemma.Gaskell@uuplc.co.uk>
Sent: 05 October 2015 13:11
To: Development Plans
Cc: Pemberton, Rebecca; Hope, Jenny
Subject: RE: Blackpool Local Plan Part 1 Core Strategy proposed Main Modification Consultation

Dear Sir / Madam

Thank you for your consultation seeking the views of United Utilities on the Local Plan Part 1 Proposed Main Modification Consultation.

We are pleased to see that the proposed modifications to Policy CS9 and the supporting text (MainMod 10 & 11) are in line with United Utilities previous response to the Proposed Core Strategy Submission consultation. As such, United Utilities are in support of these modifications.

We have no further comments to make on any proposed Main Modifications to the Core Strategy.

I would be grateful if you could continue to keep United Utilities informed of future consultations on your emerging Local Plan, to ensure we can facilitate the delivery of the necessary sustainable water and wastewater infrastructure in line with your delivery targets, whilst safeguarding our service to customers.

If you wish to discuss anything in further detail please don't hesitate in contacting me.

Kind regards
Gemma

Gemma Gaskell
Developer Services and Planning
Operational Services
United Utilities
T: 01925 731 378 (internal 31378)
M: 07786 276 522 (mobex 55053)
unitedutilities.com

If you have received great service or if you have an idea on how we can make our service better, please let us know!

Visit: unitedutilities.com/wow

From: consult@objective.co.uk [<mailto:consult@objective.co.uk>]
Sent: 25 August 2015 14:01
To: Planning Liaison
Subject: Blackpool Local Plan Part 1 Core Strategy proposed Main Modification Consultation

4 – Natural England

development.plans@blackpool.gov.uk

BY EMAIL ONLY

**NATURAL
ENGLAND**

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ
T 0300 060 3900

Dear Sir/Madam

Planning consultation: Blackpool Local Plan Part 1 Core Strategy proposed Main Modification Consultation

Thank you for consultation received on 25th August 2015.

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

Natural England does not have any comments to make on the Modifications to the Blackpool Local Plan Part 1 Core Strategy proposed Main Modification Consultation

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

Yours sincerely

Kate Wheeler
Cheshire, Greater Manchester, Merseyside and Lancashire Area



Historic England

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

Our ref: 1836
Your ref:
Date 25 September
2015

Development.plans@blackpool.gov.uk

Dear Sir/Madam

Blackpool Local Plan Part 1: Core Strategy Proposed Main Modifications Consultation

Thank you for consulting Historic England on the above document. Historic England has provided a separate response to the addendum of the sustainability appraisal (see letter dated 25 September 2015, reference 1861). We expect that plan policies that have regard to the historic environment should reflect the requirements of the NPPF and that of the Planning and Compulsory Purchase Act 2004 and The Town and Country Planning Act 1990. In view our comments below, the proposed modifications fail to do this.

We have the following comments to make:

MainMod09, Page 61, CS8: Heritage

Historic England strongly opposes the modification suggested.

The NPPF requires that Local Plans should include policies that conserve and enhance the historic environment. In terms of proposals, any development should be expected to both conserve and enhance the significance of heritage assets including their setting. The proposed change suggests that development will be supported “*in a way that recognises their significance*” and also fails to include the need for proposals to have regard to setting. This weakens the degree of protection given to heritage assets in the Plan and would not comply with the approach of the NPPF, which recognises that the significance of heritage assets can be harmed through alteration or destruction of the asset or development within its setting (Para 132). The proposed change is also contrary to the 1990 Act as there is a requirement that “special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess.

It is suggested that the modification put forward be amended as follows:



Historic England, Suite 3.3, Canada House, 3 Chepstow Street, Manchester M1 5FW
Telephone 0161 242 1416 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



“Retain, reuse or convert, whilst conserving and enhancing **the significance of**, designated and non-designated heritage assets **and their setting in a way that recognises their significance**”

MainMod13, Page 73, CS12: Sustainable Neighbourhoods

Historic England strongly opposes the modification suggested.

The main modification report states that the proposed modification is in response to a representation from English Heritage (now Historic England). Historic England would like to clarify that the proposed modification does not reflect our representation to this policy. The proposed change does not accord with the requirements of the NPPF in terms of conserving and enhancing the historic environment and reinforcing local identity and character.

MainMod19, Page 90, CS17: Blackpool Town Centre

Historic England welcomes the suggested main modification to this policy.

MainMod20, Page 94, CS18: Winter Gardens

Historic England strongly opposes the modification suggested.

The NPPF requires that Local Plans should include policies that conserve and enhance the historic environment. In terms of proposals, any development should be expected to both sustain and enhance the significance of heritage assets including their setting. The proposed change suggests that development will be required to “*sustain and enhance the heritage*” of the Winter Gardens. This does not particularly accord with the requirements of the NPPF which expects proposals to sustain and enhance *significance* and not the heritage or an asset and therefore, weakens the degree of protection given to this important heritage asset in the Plan. The proposed change is also contrary to the 1990 Act as there is a requirement that “special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess.

It is suggested that the modification put forward be amended as follows:

“.....*sustain and enhance the **heritage significance** of the Grade 2**”

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

E. Hrycan

Emily Hrycan

Historic Environment Planning Adviser (North West)

Historic England

Telephone: 0161 242 1423

e-mail: emily.hrycan@HistoricEngland.org.uk



Historic England, Suite 3.3, Canada House, 3 Chepstow Street, Manchester M1 5FW

Telephone 0161 242 1416 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



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

Our ref: 1861
Your ref:
Date 25 September
2015

Development.plans@blackpool.gov.uk

Dear Sir/Madam

Blackpool Local Plan Part 1: Core Strategy Proposed Main Modifications Consultation – Sustainability Appraisal

Thank you for consulting Historic England on the above document. Historic England has provided a separate response to the main modifications to the core strategy (see letter dated 25 September 2015, reference 1836). We expect that plan policies that have regard to the historic environment should reflect the requirements of the NPPF and that of the Planning and Compulsory Purchase Act 2004 and The Town and Country Planning Act 1990. In view our comments on the modifications, we have the following comments to make on the addendum to the SA:

MainMod09, Page 61, CS8: Heritage

Historic England **disagrees** with the SA comment that the proposed policy now reflects the wording in the NPPF and no further assessment is required.

The proposed change suggests that development will be supported “*in a way that recognises their significance*” and also fails to include the need for proposals to have regard to setting. This weakens the degree of protection given to heritage assets in the Plan and would not comply with the approach of the NPPF, which recognises that the significance of heritage assets can be harmed through alteration or destruction of the asset or development within its setting (Para 132). The proposed change is also contrary to the 1990 Act as there is a requirement that “special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess.

Therefore, in view of the main modification, a further assessment is required as the Local Plan policy is considered to have a negative impact on the historic environment in Blackpool and on the achievement of the SA Objective on Heritage.

MainMod13, Page 73, CS12: Sustainable Neighbourhoods



Historic England, Suite 3.3, Canada House, 3 Chepstow Street, Manchester M1 5FW
Telephone 0161 242 1416 HistoricEngland.org.uk

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Correspondence or information which you send us may therefore become publicly available.



Historic England **disagrees** with the SA comment that it is a minor wording change that would not affect the SA score and no further assessment is required.

The main modification report states that the proposed modification is in response to a representation from English Heritage (now Historic England). Historic England would like to clarify that the proposed modification does not reflect our representation to this policy. The proposed change does not accord with the requirements of the NPPF in terms of conserving and enhancing the historic environment (and its setting) and reinforcing local identity and character.

Therefore, this policy cannot demonstrate that it puts forward a positive strategy for the historic environment and as a result is considered to have a negative impact on the achievement of the SA Objective on Heritage. Further assessment is required.

MainMod20, Page 94, CS18: Winter Gardens (SA Addendum Reference MainMod23)

The SA addendum differs in reference number to that of the main modifications report (MainMod23).

Historic England **disagrees** with the SA comments that no further assessment is required as it provides greater clarity.

In terms of proposals, any development should be expected to both sustain and enhance the significance of heritage assets including their setting. The proposed change suggests that development will be required to “*sustain and enhance the heritage*” of the Winter Gardens. This does not particularly accord with the requirements of the NPPF which expects proposals to sustain and enhance significance and not the heritage or an asset and therefore, weakens the degree of protection given to this important heritage asset in the Plan. The proposed change is also contrary to the 1990 Act as there is a requirement that “special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess.

Therefore, in view of the modification, it is considered that this policy will have both positive and negative impacts on the achievement of the SA Objective on Heritage and requires further assessment.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,



Emily Hrycan

Historic Environment Planning Adviser (North West)

Historic England

Telephone: 0161 242 1423

e-mail: emily.hrycan@HistoricEngland.org.uk



Historic England, Suite 3.3, Canada House, 3 Chepstow Street, Manchester M1 5FW

Telephone 0161 242 1416 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



6 – Home Builders Federation

PART A: Contact Information

For official use only

Ref: CSMM/

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

	Person/Organisation	Agent (if applicable)
Name	Matthew Good	
Organisation	Home Builders Federation	
Address	C/O The Styes Cottage	
	Styes Lane	
	Sowerby	
	Sowerby Bridge	
Postcode	HX6 1NF	
Telephone	07972774229	
Email	matthew.good@hbf.co.uk	

How we will use your details

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

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

For official use only

Ref: CSMM /

PART B: Representation

Please use a separate form for each proposed Main Modification you wish to comment on

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

Name:	Matthew Good
Organisation	Home Builders Federation

Which document does your comment refer to?	
Core Strategy Proposed Main Modifications	<input checked="" type="checkbox"/>
Sustainability Appraisal of the Proposed Main Modifications	<input type="checkbox"/>

Please state the reference number of the Proposed Main Modification or the section in the Sustainability Appraisal Addendum to which your comment specifically refers	
Main Modification:	MainMod... see attached
Sustainability Appraisal Addendum	Page/Section:

In the context of the Proposed Main Modifications, do you consider the Core Strategy is:	
(a) Legally compliant?	Yes <input type="checkbox"/> No <input type="checkbox"/>
(b) Sound?	see attached Yes <input type="checkbox"/> No <input type="checkbox"/>
If you have answered no to (b) please state why you consider the Main Modification is unsound:	
(i) Not positively prepared	<input type="checkbox"/>
(ii) Not justified	<input type="checkbox"/> see attached
(iii) Not effective	<input type="checkbox"/>
(iv) Not consistent with national policy	<input type="checkbox"/>

<p>Please give details of why you consider the Main Modification to be not legally compliant or unsound. Your reason should concisely cover all the information, evidence and supporting information necessary to support or justify your comments.</p> <p>You may also use this box if you wish to support the legal compliance or soundness of the Core Strategy Proposed Main Modifications or make a representation on the Sustainability Appraisal of the Proposed Main Modifications.</p> <p>See attached</p>

Continue on a separate sheet/expand box if necessary

Please set out the change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified previously where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It is helpful if you are able to put forward your suggested revised wording for the proposed modification or any additional modification you deem necessary to ensure the Plan is sound. Please be as precise as possible

See attached

Continue on a separate sheet/expand box if necessary

Declaration

I understand that all representations submitted will be made available for public inspection and will be identifiable to my name and organisation (if applicable).

Signature: *MJ Good*

Date: 5th October 2015



THE HOME BUILDERS FEDERATION

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

Date: 5th October 2015

Email: development.plans@blackpool.gov.uk

Sent by Email only

Dear Sir / Madam,

Blackpool Local Plan Part 1: Core Strategy Proposed Main Modifications

Thank you for consulting with the Home Builders Federation (HBF) on the Proposed Main Modifications consultation. The following comments should be read in conjunction with our representation form. The HBF is pleased to note that the Council has responded in a positive manner to a number of the issues we raised during the examination. We do, however, still have a number of outstanding objections to the plan which have not been addressed.

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

We would like to submit the following comments. **If required the HBF would also wish to attend any further hearing sessions to debate these matters further.**

MainMod01, Page 35, Policy CS2

The amendment is considered unsound as it is not positively prepared.

The proposed amendment, whilst an improvement upon the existing wording, is still not considered positively prepared. Whilst the wording removes ambiguity by the deletion of the word 'around' it appears to indicate that the plan target of 4,200 homes is a ceiling rather than a floor. The NPPF is clear that plans should be aspirational, positively prepared and provide a significant boost to housing supply (paragraphs 14, 17, 47, 154 and 182). The HBF

consider it important that the Local Plan should make clear that the housing requirement is to be seen as a minimum requirement. This will not only ensure that the plan is effective but will also ensure that sustainable development is not unnecessarily restricted through the interpretation of the housing requirement as a ceiling.

It is notable that many Inspectors have also concluded that given the requirements of the NPPF housing requirements should be expressed as minimums (examples of Inspector's reports include; Cheshire West & Chester Local Plan Part One, 15th December 2014, paragraph 48; Middlesbrough Housing Local Plan, 31st October 2014, paragraph 21; Richmondshire Local Plan: Core Strategy, 20th October 2014, paragraph 67; and Charnwood Local Plan: Core Strategy, 21st September 2015, paragraph 49)

The HBF recommends the following amendments are made to Policy CS2, to ensure that it is positively worded;

'Provision will be made for the delivery of ~~around~~ at least 4,200 (net) new homes in Blackpool between 2012 and 2027'

The above amendments would provide a more positive framework for housing delivery and identify that the Council is aiming to achieve, as a minimum, its objectively assessed need. The inclusion of 'net' after the housing requirement would clarify that the requirement takes account of demolitions.

The presence of the Council's preferred housing requirement, 4,200 over the plan period, within our proposed amendments should not be construed as an agreement to this figure. Our concerns highlighted both during the submission consultation and the hearing sessions remain.

MainMod02, Page 36, paragraph 5.11

The proposed modification is unsound as it will not be effective and is not positively prepared.

The paragraph merely indicates that the Site Allocations and Development Management Policies Document will allocate sites for housing. As discussed during the hearing sessions this document is unlikely to be adopted for a number of years. The HBF therefore considers that a positive statement upon existing sites, either within the SHLAA or promoted through other mechanisms should be included within the Core Strategy. This is considered particularly important in Blackpool given the low levels of delivery experienced over recent years and the need to promote sites and provide confidence within the market.

The HBF consider that the following wording could either be included at the end of Policy CS2, within paragraph 5.11 or as an additional supporting paragraph.

'Prior to the adoption of the Site Allocations and Development Management document proposals for new housing development will be supported on sustainable sites identified within the most recent Strategic

Housing Land Availability Assessment (SHLAA), providing they fulfil the other policy requirements of the plan’.

MainMod03, Page 37, Paragraph 5.13

The proposed amendment is considered unsound as it is not positively worded.

Throughout the examination hearing sessions the Council acknowledged that development within much of Blackpool is difficult due to viability constraints. It is therefore important that the Council seek as many avenues as possible to boost its housing supply. This should take account of the fact that some allocated sites are unlikely to come to fruition for a number of reasons. The HBF therefore recommend that a buffer of sites be provided, over and above the Core Strategy housing requirement, to ensure that the requirement is met as a minimum. This will provide flexibility within the plan, which is a key component of the NPPF. Whilst the proposed modification does discuss the potential of a buffer it stops short of indicating that this will be the case, despite the delivery problems within Blackpool. This is evident within the sentence;

*‘In recognition of Blackpool’s difficult housing market and the risks in delivering more challenging sites the Site Allocations and Development Management Policies document **is likely to include** a buffer of allocated sites over and above the minimum requirement. (our emphasis)’*

Whilst the HBF would welcome a specific buffer being indicated at this stage, with a preference for 30% given the delivery problems within Blackpool, it is recognised that the Council may wish to monitor the situation over the forthcoming years prior to the adoption of the Site Allocations and Development Management Policies Document. It is therefore recommended, as a minimum, the wording of the modification be amended to read;

*‘In recognition of Blackpool’s difficult housing market and the risks in delivering more challenging sites the Site Allocations and Development Management Policies document ~~is likely to~~ **will include** a buffer of allocated sites over and above the minimum requirement. (our emphasis)’*

This would commit the Council to the inclusion of an unspecified buffer ensuring flexibility is provided and provide a more positive stance upon which to compile the Site Allocations and Development Management Policies document. It would also suggest that the housing requirement would not be viewed as a ceiling (see our comments against MainMod01 above). The size of the buffer would be a matter for discussion at the Site Allocations and Development Management Policies document examination.

MainMod04, Page 38, Policy CS2 supporting text

The proposed modification is considered sound.

Whilst the HBF would have liked to see greater commitment to review the plan, if the housing requirements across the HMA were not being met in full, the inclusion of the additional wording is supported.

MainMod05, Page 38, Policy CS2 supporting text

The proposed modification is considered unsound as it will not be effective.

The HBF supports the inclusion of the additional wording. However, in common with our comments against MainMod02, above, we do not consider that the proposed modification is sufficiently positive or effective. Our concerns and recommendations upon this modification are the same as those for MainMod02, in aid of brevity they are not repeated here.

MainMod12, Page 66, Policy CS10 and supporting text

The modification is considered sound.

The proposed modifications are considered reflective of the national policy position and our comments made at both the publication stage and throughout the examination.

MainMod14, Page 78, Policy CS13(1)

The modification is considered sound.

The proposed modifications are considered reflective of the NPPF by including consideration of viability and providing an element of flexibility. This is also consistent with our comments made at both publication stage and throughout the examination.

MainMod16, Page 79, paragraphs 6.24 and 6.25

The modifications are unsound as they are not consistent with national policy and have not been justified.

Whilst the amendments to paragraph 6.24 are supported the HBF has a strong objection to the inclusion of a requirement for all new housing development to meet the Government's Technical Housing Standards – nationally described space standard. The PPG is clear that such a standard can only be introduced through preparation of a Local Plan and only where justification is provided. This justification should identify the need, potential impacts upon viability and timing for the introduction of such a standard (PPG ID 56-020). These issues were not addressed, in relation to space standards, at the examination, nor are we aware that the Council has produced any further evidence to support the inclusion of the optional space standard.

The HBF therefore recommends that all reference to the space standards be deleted from paragraph 6.25.

MainMod17, Page 80, Policy CS14(2)

The proposed modification is considered sound

The removal of the word '*minimum*' from the policy provides greater certainty to the development industry and as such is considered a positive step. Our concerns regarding the 30% affordable housing requirement do, however,

remain. These are based upon the viability implications of the policy as discussed within our comments upon the submitted plan and during the hearing sessions.

Notification

Please notify the HBF of the publication of the Inspector's report, the adoption of the Local Plan Part One or any future hearing sessions.

Yours sincerely,

MJ Good

Matthew Good
Planning Manager – Local Plans
Email: matthew.good@hbf.co.uk
Tel: 07972774229

7 - Barratt Homes

From: Artiss, Simon <simon.artiss@barratthomes.co.uk>
Sent: 06 October 2015 15:57
To: Development Plans
Subject: Barratt Homes - Proposed Main Modifications

Dear Sir / Madam

We have no ongoing sites within your Borough but remain interested in achieving viable new residential development. In these circumstances, we do not provide any comments on your Proposed Main Modifications but simply ask that you engage with the development industry, including ourselves, to deliver policies that support such development over the plan period. Deliverability of sites remains a key planning consideration and we seek to work with planning authorities as part of their efforts to meet their objectively assessed housing need over the plan period.

Regards.

Simon Artiss
Planning Manager, Barratt Manchester

Barratt Homes (A trading name of BDW Trading Ltd)
4 Brindley Road, City Park, Manchester, M16 9HQ

T: 0161 872 0161 F: 0161 855 2828 M: 07879 668864 / 07903 573652

e-mail: simon.artiss@barratthomes.co.uk

Website: www.barrattdevelopments.co.uk

We are actively acquiring housing land in the North West and need more – can you help?

The sender of this e-mail is a member of the Barratt Developments group of companies, the ultimate parent of which is Barratt Developments PLC (company number 00604574).

Barratt Developments PLC is registered in England and Wales with its registered office at Barratt House, Cartwright Way, Forest Business Park, Bardon Hill, Coalville, Leicestershire, LE67 1UF, together with its principal subsidiaries BDW Trading Limited (03018173), David Wilson Homes Limited (00830271) and Wilson Bowden Developments Limited (00948402). BDW North Scotland Limited (SC027535), also a principal subsidiary, is registered in Scotland and has its registered office at Blairton House Old Aberdeen Road, Balmedie, Aberdeenshire, AB23 8SH.

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<http://www.blackpool.gov.uk/EmailDisclaimer/> This message has been scanned for inappropriate or malicious content as part of the Council's e-mail and Internet policies.

8 – The Theatres Trust

PART A: Contact Information

For official use only

Ref: CSMM/

You must provide a contact name and address.

Please complete Part A in BLOCK CAPITALS as appropriate.

	Person/Organisation	Agent (if applicable)
Name	Ross Anthony	
Organisation	The Theatres Trust	
Address	22 Charing Cross Road, London	
Postcode	WC2H0QL	
Telephone		
Email	Planning@theatrust.org.uk	

How we will use your details

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

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Ref: CSMM /

PART B: Representation

Please use a separate form for each proposed Main Modification you wish to comment on

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

Name:	Ross Anthony
Organisation	The Theatres Trust

Which document does your comment refer to?	
Core Strategy Proposed Main Modifications	<input checked="" type="checkbox"/>
Sustainability Appraisal of the Proposed Main Modifications	<input type="checkbox"/>

Please state the reference number of the Proposed Main Modification or the section in the Sustainability Appraisal Addendum to which your comment specifically refers	
Main Modification:	MainMod...MM19.....
Sustainability Appraisal Addendum	Page/Section:

In the context of the Proposed Main Modifications, do you consider the Core Strategy is:	
(a) Legally compliant?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
(b) Sound?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
If you have answered no to (b) please state why you consider the Main Modification is unsound:	
(i) Not positively prepared	<input type="checkbox"/>
(ii) Not justified	<input type="checkbox"/>
(iii) Not effective	<input type="checkbox"/>
(iv) Not consistent with national policy	<input type="checkbox"/>

<p>Please give details of why you consider the Main Modification to be not legally compliant or unsound. Your reason should concisely cover all the information, evidence and supporting information necessary to support or justify your comments.</p> <p>You may also use this box if you wish to support the legal compliance or soundness of the Core Strategy Proposed Main Modifications or make a representation on the Sustainability Appraisal of the Proposed Main Modifications.</p> <p>The Trust supports the modifications as the wording is more appropriate and it provides clarity about the future use heritage and cultural assets.</p>

Continue on a separate sheet/expand box if necessary

Please set out the change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified previously where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It is helpful if you are able to put forward your suggested revised wording for the proposed modification or any additional modification you deem necessary to ensure the Plan is sound. Please be as precise as possible

Continue on a separate sheet/expand box if necessary

Declaration

I understand that all representations submitted will be made available for public inspection and will be identifiable to my name and organisation (if applicable).

Signature: Ross Anthony

Date: 28 September 2015

PART A: Contact Information

For official use only

Ref: CSMM/

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

	Person/Organisation	Agent (if applicable)
Name	Ross Anthony	
Organisation	The Theatres Trust	
Address	22 Charing Cross Road, London	
Postcode	WC2H0QL	
Telephone		
Email	Planning@theatrust.org.uk	

How we will use your details

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Ref: CSMM /

PART B: Representation

Please use a separate form for each proposed Main Modification you wish to comment on

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

Name:	Ross Anthony
Organisation	The Theatres Trust

Which document does your comment refer to?	
Core Strategy Proposed Main Modifications	<input checked="" type="checkbox"/>
Sustainability Appraisal of the Proposed Main Modifications	<input type="checkbox"/>

Please state the reference number of the Proposed Main Modification or the section in the Sustainability Appraisal Addendum to which your comment specifically refers	
Main Modification:	MainMod...MM20.....
Sustainability Appraisal Addendum	Page/Section:

In the context of the Proposed Main Modifications, do you consider the Core Strategy is:	
(a) Legally compliant?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
(b) Sound?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
If you have answered no to (b) please state why you consider the Main Modification is unsound:	
(i) Not positively prepared	<input type="checkbox"/>
(ii) Not justified	<input type="checkbox"/>
(iii) Not effective	<input type="checkbox"/>
(iv) Not consistent with national policy	<input type="checkbox"/>

<p>Please give details of why you consider the Main Modification to be not legally compliant or unsound. Your reason should concisely cover all the information, evidence and supporting information necessary to support or justify your comments.</p> <p>You may also use this box if you wish to support the legal compliance or soundness of the Core Strategy Proposed Main Modifications or make a representation on the Sustainability Appraisal of the Proposed Main Modifications.</p> <p>The Trust supports the modifications as the wording is more appropriate and it provides clarity about the future use heritage and cultural assets.</p>

Continue on a separate sheet/expand box if necessary

Please set out the change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified previously where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It is helpful if you are able to put forward your suggested revised wording for the proposed modification or any additional modification you deem necessary to ensure the Plan is sound. Please be as precise as possible

Continue on a separate sheet/expand box if necessary

Declaration

I understand that all representations submitted will be made available for public inspection and will be identifiable to my name and organisation (if applicable).

Signature: Ross Anthony

Date: 28 September 2015

PART A: Contact Information

For official use only

Ref: CSMM/

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

	Person/Organisation	Agent (if applicable)
Name	Ross Anthony	
Organisation	The Theatres Trust	
Address	22 Charing Cross Road, London	
Postcode	WC2H0QL	
Telephone		
Email	Planning@theatretrust.org.uk	

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Ref: CSMM /

PART B: Representation

Please use a separate form for each proposed Main Modification you wish to comment on

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

Name:	Ross Anthony
Organisation	The Theatres Trust

Which document does your comment refer to?	
Core Strategy Proposed Main Modifications	<input checked="" type="checkbox"/>
Sustainability Appraisal of the Proposed Main Modifications	<input type="checkbox"/>

Please state the reference number of the Proposed Main Modification or the section in the Sustainability Appraisal Addendum to which your comment specifically refers	
Main Modification:	MainMod...MM21.....
Sustainability Appraisal Addendum	Page/Section:

In the context of the Proposed Main Modifications, do you consider the Core Strategy is:	
(a) Legally compliant?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
(b) Sound?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
If you have answered no to (b) please state why you consider the Main Modification is unsound:	
(i) Not positively prepared	<input type="checkbox"/>
(ii) Not justified	<input type="checkbox"/>
(iii) Not effective	<input type="checkbox"/>
(iv) Not consistent with national policy	<input type="checkbox"/>

<p>Please give details of why you consider the Main Modification to be not legally compliant or unsound. Your reason should concisely cover all the information, evidence and supporting information necessary to support or justify your comments.</p> <p>You may also use this box if you wish to support the legal compliance or soundness of the Core Strategy Proposed Main Modifications or make a representation on the Sustainability Appraisal of the Proposed Main Modifications.</p> <p>The Trust supports the modifications as the wording is more appropriate and it provides clarity about the future use heritage and cultural assets.</p>

Continue on a separate sheet/expand box if necessary

Please set out the change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified previously where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It is helpful if you are able to put forward your suggested revised wording for the proposed modification or any additional modification you deem necessary to ensure the Plan is sound. Please be as precise as possible

Continue on a separate sheet/expand box if necessary

Declaration

I understand that all representations submitted will be made available for public inspection and will be identifiable to my name and organisation (if applicable).

Signature: Ross Anthony

Date: 28 September 2015

9 – The Princes Regeneration Trust

From: Susan O'Connor <Susan.OConnor@princes-regeneration.org>
Sent: 06 October 2015 10:18
To: Development Plans
Subject: Blackpool's Core Strategy

To whom it may concern, please find my comments below in relation to the above – I am unable to fill out the online form as it is in PDF format only.

There are two Main Modifications which affect the Winter Gardens (Main Mod21 and Main Mod22). Both refer to 'limited retail uses' (No 21 is inside the WG, No22 is outside the building).

The Prince's Regeneration Trust recommends that the word 'limited' be removed from both Main Modifications (No. 21 and No.22) on the basis that the wording could discourage possible end users which may well be suitable tenancy opportunities for the Winter Gardens.

The Prince's Regeneration Trust recommends for both Main Mod 21 and Main Mod 22 the word 'limited' is removed as in practice this situation can be managed on a case by case basis without the need to set out this propensity for limiting in writing as part of the Core Strategy.

Regards,

Susan O'Connor

Susan O'Connor
Scotland and Northern Ireland Projects Adviser

The Prince's Regeneration Trust
14 Buckingham Palace Road
London, SW1W 0QP
T: 020 3262 0560
D: 07741 314481
E: susan.oconnor@princes-regeneration.org
W: www.princes-regeneration.org

<http://www.blackpool.gov.uk/EmailDisclaimer/> This message has been scanned for inappropriate or malicious content as part of the Council's e-mail and Internet policies.

10 – RPS Planning on Behalf of Blackpool Pleasure Beach

PART A: Contact Information

For official use only

Ref: CSMM/

You must provide a contact name and address.

Please complete Part A in BLOCK CAPITALS as appropriate.

	Person/Organisation	Agent (if applicable)
Name		Nick Laister
Organisation	Blackpool Pleasure Beach Ltd	RPS
Address	525 Ocean Boulevard	20 Western Avenue
	Blackpool	Milton Park
		Abingdon
		Oxfordshire
Postcode	FY4 1EZ	OX14 4SH
Telephone		01235 838214
Email		Nick.laister@rpsgroup.com

How we will use your details

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For official use only

Ref: CSMM /

PART B: Representation

Please use a separate form for each proposed Main Modification you wish to comment on

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

Name:	Nick Laister (RPS)
Organisation	Blackpool Pleasure Beach Ltd

Which document does your comment refer to?	
Core Strategy Proposed Main Modifications	<input checked="" type="checkbox"/>
Sustainability Appraisal of the Proposed Main Modifications	<input type="checkbox"/>

Please state the reference number of the Proposed Main Modification or the section in the Sustainability Appraisal Addendum to which your comment specifically refers	
Main Modification:	MainMod27
Sustainability Appraisal Addendum	Page/Section:

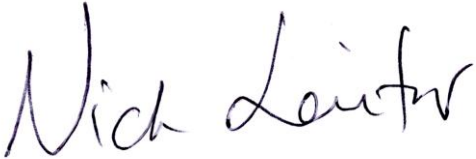
In the context of the Proposed Main Modifications, do you consider the Core Strategy is:	
(a) Legally compliant?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
(b) Sound?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
If you have answered no to (b) please state why you consider the Main Modification is unsound:	
(i) Not positively prepared	<input type="checkbox"/>
(ii) Not justified	<input type="checkbox"/>
(iii) Not effective	<input type="checkbox"/>
(iv) Not consistent with national policy	<input type="checkbox"/>

<p>Please give details of why you consider the Main Modification to be not legally compliant or unsound. Your reason should concisely cover all the information, evidence and supporting information necessary to support or justify your comments.</p> <p>You may also use this box if you wish to support the legal compliance or soundness of the Core Strategy Proposed Main Modifications or make a representation on the Sustainability Appraisal of the Proposed Main Modifications.</p> <p>We consider that the amendment proposed to Paragraph 7.39 resolves our objection and this part of the Plan is no longer considered to be unsound.</p>
--

Continue on a separate sheet/expand box if necessary

Please set out the change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified previously where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It is helpful if you are able to put forward your suggested revised wording for the proposed modification or any additional modification you deem necessary to ensure the Plan is sound. Please be as precise as possible

Continue on a separate sheet/expand box if necessary

Declaration	
I understand that all representations submitted will be made available for public inspection and will be identifiable to my name and organisation (if applicable).	
Signature: 	Date: 6 October 2015

PART A: Contact Information

For official use only

Ref: CSMM/

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

	Person/Organisation	Agent (if applicable)
Name		Nick Laister
Organisation	Blackpool Pleasure Beach Ltd	RPS
Address	525 Ocean Boulevard	20 Western Avenue
	Blackpool	Milton Park
		Abingdon
		Oxfordshire
Postcode	FY4 1EZ	OX14 4SH
Telephone		01235 838214
Email		Nick.laister@rpsgroup.com

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Ref: CSMM /

PART B: Representation

Please use a separate form for each proposed Main Modification you wish to comment on

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

Name:	Nick Laister (RPS)
Organisation	Blackpool Pleasure Beach Ltd

Which document does your comment refer to?	
Core Strategy Proposed Main Modifications	<input checked="" type="checkbox"/>
Sustainability Appraisal of the Proposed Main Modifications	<input type="checkbox"/>

Please state the reference number of the Proposed Main Modification or the section in the Sustainability Appraisal Addendum to which your comment specifically refers	
Main Modification:	MainMod26
Sustainability Appraisal Addendum	Page/Section:

In the context of the Proposed Main Modifications, do you consider the Core Strategy is:	
(a) Legally compliant?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
(b) Sound?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
If you have answered no to (b) please state why you consider the Main Modification is unsound:	
(i) Not positively prepared	<input type="checkbox"/>
(ii) Not justified	<input type="checkbox"/>
(iii) Not effective	<input type="checkbox"/>
(iv) Not consistent with national policy	<input type="checkbox"/>

Please give details of why you consider the **Main Modification** to be not legally compliant or unsound. Your reason should concisely cover all the information, evidence and supporting information necessary to support or justify your comments.

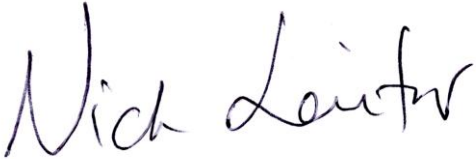
You may also use this box if you wish to support the legal compliance or soundness of the Core Strategy Proposed Main Modifications or make a representation on the Sustainability Appraisal of the Proposed Main Modifications.

We consider that the amendment proposed to Policy CS22 resolves our objection and this part of the Plan is no longer considered to be unsound.

Continue on a separate sheet/expand box if necessary

Please set out the change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified previously where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It is helpful if you are able to put forward your suggested revised wording for the proposed modification or any additional modification you deem necessary to ensure the Plan is sound. Please be as precise as possible

Continue on a separate sheet/expand box if necessary

Declaration	
I understand that all representations submitted will be made available for public inspection and will be identifiable to my name and organisation (if applicable).	
Signature: 	Date: 6 October 2015

PART A: Contact Information

For official use only

Ref: CSMM/

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

	Person/Organisation	Agent (if applicable)
Name		Nick Laister
Organisation	Blackpool Pleasure Beach Ltd	RPS
Address	525 Ocean Boulevard	20 Western Avenue
	Blackpool	Milton Park
		Abingdon
		Oxfordshire
Postcode	FY4 1EZ	OX14 4SH
Telephone		01235 838214
Email		Nick.laister@rpsgroup.com

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Ref: CSMM /

PART B: Representation

Please use a separate form for each proposed Main Modification you wish to comment on

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

Name:	Nick Laister (RPS)
Organisation	Blackpool Pleasure Beach Ltd

Which document does your comment refer to?	
Core Strategy Proposed Main Modifications	<input checked="" type="checkbox"/>
Sustainability Appraisal of the Proposed Main Modifications	<input type="checkbox"/>

Please state the reference number of the Proposed Main Modification or the section in the Sustainability Appraisal Addendum to which your comment specifically refers	
Main Modification:	MainMod25
Sustainability Appraisal Addendum	Page/Section:

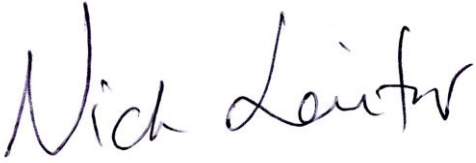
In the context of the Proposed Main Modifications, do you consider the Core Strategy is:	
(a) Legally compliant?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
(b) Sound?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
If you have answered no to (b) please state why you consider the Main Modification is unsound:	
(i) Not positively prepared	<input type="checkbox"/>
(ii) Not justified	<input type="checkbox"/>
(iii) Not effective	<input type="checkbox"/>
(iv) Not consistent with national policy	<input type="checkbox"/>

<p>Please give details of why you consider the Main Modification to be not legally compliant or unsound. Your reason should concisely cover all the information, evidence and supporting information necessary to support or justify your comments.</p> <p>You may also use this box if you wish to support the legal compliance or soundness of the Core Strategy Proposed Main Modifications or make a representation on the Sustainability Appraisal of the Proposed Main Modifications.</p> <p>We consider that the amendments proposed to Policy CS21 resolve our objection and this part of the Plan is no longer considered to be unsound.</p>

Continue on a separate sheet/expand box if necessary

Please set out the change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified previously where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It is helpful if you are able to put forward your suggested revised wording for the proposed modification or any additional modification you deem necessary to ensure the Plan is sound. Please be as precise as possible

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Declaration	
I understand that all representations submitted will be made available for public inspection and will be identifiable to my name and organisation (if applicable).	
Signature: 	Date: 6 October 2015

PART A: Contact Information

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

	Person/Organisation	Agent (if applicable)
Name		Nick Laister
Organisation	Blackpool Pleasure Beach Ltd	RPS
Address	525 Ocean Boulevard	20 Western Avenue
	Blackpool	Milton Park
		Abingdon
		Oxfordshire
Postcode	FY4 1EZ	OX14 4SH
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Email		Nick.laister@rpsgroup.com

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PART B: Representation

Please use a separate form for each proposed Main Modification you wish to comment on

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

Name:	Nick Laister (RPS)
Organisation	Blackpool Pleasure Beach Ltd

Which document does your comment refer to?	
Core Strategy Proposed Main Modifications	<input checked="" type="checkbox"/>
Sustainability Appraisal of the Proposed Main Modifications	<input type="checkbox"/>

Please state the reference number of the Proposed Main Modification or the section in the Sustainability Appraisal Addendum to which your comment specifically refers

Main Modification:	MainMod24
Sustainability Appraisal Addendum	Page/Section:

In the context of the Proposed Main Modifications, do you consider the Core Strategy is:

- (a) Legally compliant? Yes No
- (b) Sound? Yes No

If you have answered no to (b) please state why you consider the Main Modification is unsound:

- (i) Not positively prepared
- (ii) Not justified
- (iii) Not effective
- (iv) Not consistent with national policy

Please give details of why you consider the **Main Modification** to be not legally compliant or unsound. Your reason should concisely cover all the information, evidence and supporting information necessary to support or justify your comments.

You may also use this box if you wish to support the legal compliance or soundness of the Core Strategy Proposed Main Modifications or make a representation on the Sustainability Appraisal of the Proposed Main Modifications.

We do not consider that MainMod24, which proposes to amend Policy CS20(2), goes far enough to resolve our client's serious concerns.

In our August 2014 representations, we noted that under the current policy it would be possible for

a new amusement park to be developed on the Leisure Quarter site, which could significantly undermine the Pleasure Beach and the resort itself.

We explained that the Pleasure Beach has been operating for well over 100 years and is one of the most famous amusement parks in the UK, being the most popular commercial attraction in Blackpool and a key reason for visiting the town for many people. We stated that:

“Although it is a nationally prominent attraction, it is operating in a very difficult environment, where the extensive infrastructure is being maintained and developed against a backdrop of the decline in visitors to Blackpool as a resort. The owners of the Pleasure Beach have been very successful in repositioning the park so that it can continue to attract visitors in large numbers despite the general decline in Blackpool as a whole, with significant investment in park infrastructure, food & beverage offer, park retailing along with the introduction of a large number of high profile new rides and partnerships with international brands. However, despite the successful repositioning of the operation, it remains a vulnerable business, and it is essential that its ability to continue to invest is not undermined by speculative amusement park development elsewhere in the town. In the same way that Blackpool Town Centre is being correctly protected as the main location for major comparison retail development, the Pleasure Beach needs to be protected as the location for major amusement park development.

“Given the extent to which Blackpool’s future success depends on the Pleasure Beach being able to continue to invest in new attractions, we consider that this policy needs to make clear that this site should not be a location for a new amusement park. This would be justified by the evidence base in that the Pleasure Beach has provided information about its vulnerability as an attraction in previous representations and this policy, in its new more flexible form, does not reflect this need to protect the Pleasure Beach as one of the biggest drivers of new visitors to the resort.”

We expanded upon this in our Hearing Statement, by stating the following:

“We set out in our representations why we considered it to be necessary to restrict amusement park development on this site. Blackpool Pleasure Beach is a unique, internationally-renowned visitor attraction. It is the largest traditional amusement park in the UK, and offers a visitor experience that is the highest regarded of any similar attraction in the country. In 2014, it was recognised as having received the highest ratings of any theme park in the UK on TripAdvisor. It is also home to a remarkable collection of historic rides and buildings, some the oldest of their kind in the world, which operate alongside some of the largest and most high-tech attractions operating in any theme park. The scale of the operation, and its historic and cultural importance is such that it is highly vulnerable to the introduction of similar development closer to the centre of Blackpool. Such development may have very little infrastructure cost. For example, the stationing of travelling fairground rides on the Leisure Quarter as part of a comprehensive redevelopment would involve little investment, and the rides could be easily removed at a later date. But the impact of such a development on the Pleasure Beach could be very damaging. As Blackpool’s most-visited attraction, any development which harms the Pleasure Beach and makes it less attractive to visitors would also have an impact on the resort’s ability to attract visitors.

“In its November 2014 response to Blackpool Pleasure Beach’s objections, the Council stated that guidance on acceptable uses is set out in the adopted Development Brief SPD (March 2011). However, this document does not in any way prevent amusement park/funfair development in the Leisure Quarter.

“Objective 14 of the Core Strategy (Goal 3) states that a key objective is to “sustain a high quality,

year-round visitor offer by growing and promoting our tourism, arts, heritage and cultural offer". It is therefore fundamental to the soundness of the Plan that all policies work together to achieve this objective. Policy CS20 is a key tourism policy, which aims to initiate the regeneration of one of the most important regeneration sites in the town. It is important that any such development does not undermine any of the iconic features that make Blackpool such a distinctive destination. A distinctive resort requires distinctive planning policies.

"Development that could undermine the viability of the Pleasure Beach could have far-reaching consequences on the achievement of this objective, and therefore for the success of the tourism policies (and indeed all policies aiming to secure growth in the town's local economy) in the Core Strategy. There is no justification for this policy to allow for development that could undermine the Pleasure Beach, and the policy would not be effective in achieving the wider objectives of the Plan if it was adopted in this form.

"We therefore consider it to be appropriate and necessary to the soundness of the Plan for Policy CS20 to restrict amusement park development in the Leisure Quarter."

The Council wrote to RPS on 15th June 2015 and proposed an amendment to this policy:

"Further to the discussion had at the examination, we are still somewhat uncomfortable with the idea to 'rule out' certain types of development as it strays into the realms of competition which is not a planning consideration. However in recognition of your concerns we propose some additional wording to strengthen the support for existing resort core uses and attractions, as set out below in b.

*b. Integrate with and support, **whilst not undermining** existing resort core uses and attractions"*

We responded with the following comments (email dated 29 June 2015):

*"Whilst we welcome this additional strengthening of the Policy, we consider that it needs to be made clear within Part 3 of the Policy that development that will undermine established attractions will not be permitted. As stated at the hearing, we consider that this should make specific reference to "amusement park", as the economy of Blackpool relies heavily on the continued success of existing amusement parks. Such a policy would not be solely protecting Blackpool Pleasure Beach, as there are other amusement parks in the town, specifically on North, Central and South Piers. For the reasons set out in our representations and hearing statement, this is a big issue for the Pleasure Beach as a development of limited investment and potentially of a transitory nature at the Leisure Quarter site could have far-reaching, long-term effects on the viability of the Pleasure Beach and the ability of the operator to continue to run the park at the current scale of attractions, infrastructure and jobs. Any such damage would be potentially permanent and harmful to Blackpool's economy as a whole. We also consider that the policy needs to be stronger than merely stating that development should not 'undermine', by stating clearly what type of development will not be permitted. We would therefore continue to request an additional clause in Part 3 of the Policy stating: **"...but amusement park development will not be permitted."** This can be justified given the unique nature of Blackpool's attractions (including the Pleasure Beach), their importance as part of Blackpool's heritage and economy, and their vulnerability to similar developments. Without such a clear statement in the policy, future investment at existing amusement park attractions, which is essential to ensure their long-term future viability and vitality, could be restricted.*

"The term 'amusement park' is defined in Paragraph B.2 of Class B, Part 18 of The Town and Country Planning (General Permitted Development) (England) Order 2015, and refers to an outdoor area of

open land used as a funfair. The Core Strategy needs to make clear that amusement park development would include indoor amusement park/funfair attractions.”

As stated in our email of 29th June, we do not consider that this amendment goes far enough in recognising the vulnerability of the Pleasure Beach (with its important heritage, its role as a primary attractor of visitors and a generator of significant jobs and economic activity in the town) to a low-cost amusement park starting up on the Leisure Quarter site. In addition, it does not acknowledge the potentially far-reaching consequences of such a development on the town as well as the Pleasure Beach itself.

The addition of the clause **“whilst not undermining existing resort core uses and attractions”** will allow the Council to consider the possible effects of any proposed developments on other attractions such as the Pleasure Beach, but it does not recognise the unique circumstances that exist in relation to the Pleasure Beach. It would still be possible to bring forward an indoor or outdoor amusement park development as part of this wider development. Visitors to Blackpool will generally only visit one amusement park, as admission/wristbands have relatively high cost due to the capital and staff-intensive nature of the operations. A new amusement park at the Leisure Quarter site would potentially remove a significant proportion of the visitors who would otherwise visit the Pleasure Beach, and the Leisure Quarter’s location at the heart of the Golden Mile - immediately adjacent to the Town Centre and close to the main resort car parks – could have a severely negative impact on the Pleasure Beach’s viability.

Under normal circumstances this would not be a planning matter; it would be a matter of competition. In this case, however, it is fundamental to the success of resort regeneration. The Pleasure Beach has existed for well over 100 years and is now such an integral part of Blackpool’s offer – and for many visitors is the main reason for visiting the town – that the need to protect the park, its outstanding and internationally unique built heritage, its significant jobs (around 750 FTE averaged across the season) and its contribution to the local economy mean that it needs special recognition in the Plan. It is critically important to Blackpool as a resort, and it is essential that this is specifically recognised within the Plan. For the park to continue to operate at its current scale (which is larger than any other seaside operation in the UK) there needs to be recognition by the Council that developments that would create a new amusement park in the town centre should be resisted in favour of other, complementary leisure and tourism provision. As Policy CS20(1) states, the development should **“provide a compelling new reason to visit Blackpool”**. A new amusement park would not achieve that as it would provide an alternative destination for existing visitors to Blackpool, but it needs to be stated clearly in the policy for the avoidance of doubt.

We consider the only way to achieve this, and therefore to make the Plan sound, is to insert a clause within Policy CS20, as proposed in our previous representations. And given the statement in CS20(1) about creating a new reason to visit Blackpool, a clause which states that amusement park development will not be permitted would not in any way undermine the policy. It will, however, ensure that the policy is sound in that it is justified by the evidence base. It will also ensure that the policy is effective, in that it would prevent the policy from allowing development that would undermine other parts of the Plan which seek to build on Blackpool’s strengths and enhance its existing visitor attractions. A policy that would allow the town’s largest visitor attraction to be undermined, which would have far-reaching consequences to the resort’s success, could not be described as ‘effective’.

We therefore object to the proposed amendment in that it does not go far enough in ensuring that the Policy CS20 is justified and effective and request that the policy be further amended in accordance with our suggested wording.

Continue on a separate sheet/expand box if necessary

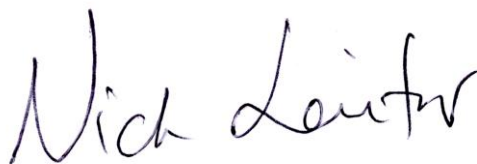
Please set out the change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified previously where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It is helpful if you are able to put forward your suggested revised wording for the proposed modification or any additional modification you deem necessary to ensure the Plan is sound. Please be as precise as possible

Continue on a separate sheet/expand box if necessary

Declaration

I understand that all representations submitted will be made available for public inspection and will be identifiable to my name and organisation (if applicable).

Signature:



Date: 6 October 2015

PART A: Contact Information

For official use only

Ref: CSMM/

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

	Person/Organisation	Agent (if applicable)
Name		Nick Laister
Organisation	Blackpool Pleasure Beach Ltd	RPS
Address	525 Ocean Boulevard	20 Western Avenue
	Blackpool	Milton Park
		Abingdon
		Oxfordshire
Postcode	FY4 1EZ	OX14 4SH
Telephone		01235 838214
Email		Nick.laister@rpsgroup.com

How we will use your details

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

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

For official use only

Ref: CSMM /

PART B: Representation

Please use a separate form for each proposed Main Modification you wish to comment on

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

Name:	Nick Laister (RPS)
Organisation	Blackpool Pleasure Beach Ltd

Which document does your comment refer to?	
Core Strategy Proposed Main Modifications	<input checked="" type="checkbox"/>
Sustainability Appraisal of the Proposed Main Modifications	<input type="checkbox"/>

Please state the reference number of the Proposed Main Modification or the section in the Sustainability Appraisal Addendum to which your comment specifically refers	
Main Modification:	MainMod8
Sustainability Appraisal Addendum	Page/Section:

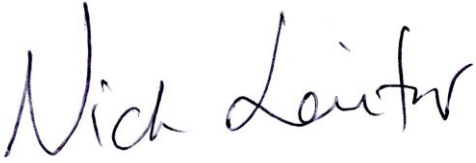
In the context of the Proposed Main Modifications, do you consider the Core Strategy is:	
(a) Legally compliant?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
(b) Sound?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
If you have answered no to (b) please state why you consider the Main Modification is unsound:	
(i) Not positively prepared	<input type="checkbox"/>
(ii) Not justified	<input type="checkbox"/>
(iii) Not effective	<input type="checkbox"/>
(iv) Not consistent with national policy	<input type="checkbox"/>

<p>Please give details of why you consider the Main Modification to be not legally compliant or unsound. Your reason should concisely cover all the information, evidence and supporting information necessary to support or justify your comments.</p> <p>You may also use this box if you wish to support the legal compliance or soundness of the Core Strategy Proposed Main Modifications or make a representation on the Sustainability Appraisal of the Proposed Main Modifications.</p> <p>We consider that the amendments proposed to Policy CS5(5) resolve our objection and this part of the Plan is no longer considered to be unsound.</p>

Continue on a separate sheet/expand box if necessary

Please set out the change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified previously where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It is helpful if you are able to put forward your suggested revised wording for the proposed modification or any additional modification you deem necessary to ensure the Plan is sound. Please be as precise as possible

Continue on a separate sheet/expand box if necessary

Declaration	
I understand that all representations submitted will be made available for public inspection and will be identifiable to my name and organisation (if applicable).	
Signature: 	Date: 6 October 2015

PART A: Contact Information

For official use only

Ref: CSMM/

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

	Person/Organisation	Agent (if applicable)
Name		Nick Laister
Organisation	Blackpool Pleasure Beach Ltd	RPS
Address	525 Ocean Boulevard	20 Western Avenue
	Blackpool	Milton Park
		Abingdon
		Oxfordshire
Postcode	FY4 1EZ	OX14 4SH
Telephone		01235 838214
Email		Nick.laister@rpsgroup.com

How we will use your details

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PART B: Representation

Please use a separate form for each proposed Main Modification you wish to comment on

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

Name:	Nick Laister (RPS)
Organisation	Blackpool Pleasure Beach Ltd

Which document does your comment refer to?	
Core Strategy Proposed Main Modifications	<input checked="" type="checkbox"/>
Sustainability Appraisal of the Proposed Main Modifications	<input type="checkbox"/>

Please state the reference number of the Proposed Main Modification or the section in the Sustainability Appraisal Addendum to which your comment specifically refers	
Main Modification:	MainMod7
Sustainability Appraisal Addendum	Page/Section:

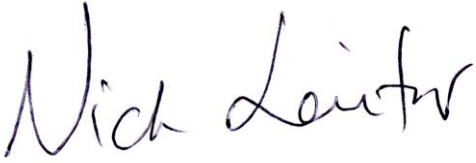
In the context of the Proposed Main Modifications, do you consider the Core Strategy is:	
(a) Legally compliant?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
(b) Sound?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
If you have answered no to (b) please state why you consider the Main Modification is unsound:	
(i) Not positively prepared	<input type="checkbox"/>
(ii) Not justified	<input type="checkbox"/>
(iii) Not effective	<input type="checkbox"/>
(iv) Not consistent with national policy	<input type="checkbox"/>

<p>Please give details of why you consider the Main Modification to be not legally compliant or unsound. Your reason should concisely cover all the information, evidence and supporting information necessary to support or justify your comments.</p> <p>You may also use this box if you wish to support the legal compliance or soundness of the Core Strategy Proposed Main Modifications or make a representation on the Sustainability Appraisal of the Proposed Main Modifications.</p> <p>We consider that the amendments proposed to Policy CS4, which now refers to Policy CS21, resolve our objection and this part of the Plan is no longer considered to be unsound.</p>
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Continue on a separate sheet/expand box if necessary

Please set out the change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified previously where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It is helpful if you are able to put forward your suggested revised wording for the proposed modification or any additional modification you deem necessary to ensure the Plan is sound. Please be as precise as possible

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