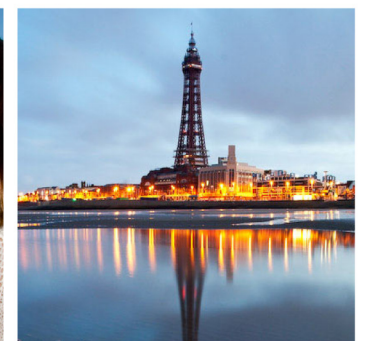
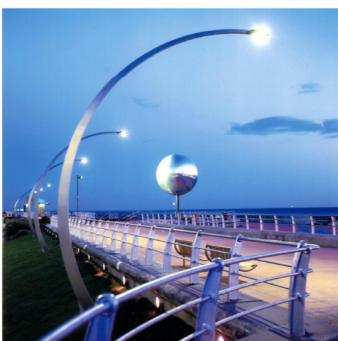


# Blackpool Council

## Core Strategy Revised Preferred Option

Consultation June-July 2012

Schedule of Representations



## 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'.	<b>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.</b>

## Chapter 2: A Spatial Portrait of Blackpool

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
<b>Spatial Portrait</b>			
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"> <li>- Suggests that Blackpool’s problems stem back from the closure of the Blackpool Central Station in the mid 1960s.</li> <li>- 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.</li> <li>- The town struggles to attract visitors from within the sub region due to poor road and bus links.</li> <li>- Raises issues with the types of goods sold from the Town Centre</li> </ul>	<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 &amp; 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 &amp; 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><b>The text in paragraph 2.24 has been amended to include reference to surface water management.</b></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><b>Amendments have been made to the wording of some of these policies and supporting text in line with</b></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"> <li>▪ Continue and/or mimic the site’s current natural discharge process</li> <li>▪ Store for later use</li> <li>▪ Discharge into infiltration systems located in porous sub soils</li> <li>▪ 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</li> <li>▪ Attenuate by storing in tanks or sealed systems for gradual release to a watercourse</li> <li>▪ Direct discharge to a watercourse</li> <li>▪ Direct discharge to a surface water sewer</li> <li>▪ Controlled discharge into the combined sewerage network <i>[this option is a last resort when all other options have been discounted]</i></li> </ul> <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><b>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.</b> 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. <a href="http://www.ciria.com/suds/index.html">http://www.ciria.com/suds/index.html</a>. 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><b>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.</b></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 &amp; 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.	<b>The text in paragraph 2.24 has been amended to acknowledge this.</b>
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"> <li>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).</li> <li>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).</li> <li>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.</li> <li>4.A Town Centre retail offer that is underperforming and suffers from significant leakage from the Fylde Coast catchment (Para.</li> </ol>	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 <b>paragraph 2.14 has been amended in recognition that there has also been some private sector investment</b>. It is considered that policies are appropriately worded so new development and investment will not undermine existing attractions including CS19: Leisure Quarter (2b) &amp; CS20: Leisure &amp; 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 &amp; CS20).</p>



Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
<b>Key Issues</b>			
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 &amp; 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 &amp; 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>

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		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 'Mission and Priorities Statement' 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>	<b>Comment accepted; text has been amended.</b> 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. <b>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.</b> 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"> <li>▪ rebalancing the housing stock and providing fair access and improved choice in quality housing within attractive neighbourhoods where people choose to live;</li> <li>▪ improving the quality of the built environment;</li> <li>▪ transforming Blackpool (including perceptions);</li> <li>▪ good accessibility; and</li> <li>▪ creating a diverse and growing economy; supporting sustainable development; and appropriate housing growth.</li> </ul> <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)
<b>Objectives</b>			
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"> <li>▪ A high quality visitor offer including new high quality attractions and accommodation (Obj. 14)</li> <li>▪ Investment in retail, leisure and other town centre uses in Blackpool Town Centre (Obj.15)</li> <li>▪ Sustainable housing regeneration and new landmark residential development (Obj. 16)</li> <li>▪ Easier and sustainable journeys within Blackpool... (Obj. 4)</li> <li>▪ Improve the health and wellbeing of Blackpool's residents and reduce health inequalities in Blackpool's inner areas... (Obj. 11)</li> </ul> <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"> <li>▪ All SPDs will be subject to public consultation</li> <li>▪ The new SHMA and Infrastructure &amp; Delivery Plan will be available for comment at the Core Strategy Proposed Submission consultation stage</li> <li>▪ The Town Centre Strategy was approved in March '13 following earlier consultation with key stakeholders</li> </ul>
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: <u>...good access to healthcare and encouraging healthier lifestyles through access to open spaces, the coast, countryside, sport and recreation facilities and healthier food.</u> <u>Reducing shops and facilities that contribute to poor health such as excessive numbers of licensed premises and fast food outlets.</u> Objective 21: <u>... community facilities providing healthier lifestyle options e.g. appropriate food stores</u>	Making specific reference to healthy eating measures is not considered necessary in this strategic objective, but <b>the wording has been amended to '<u>including access to...</u></b> ' 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.	<b>Objective 12 has been amended to include reference to improving aspirations.</b>
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. <b>Objective 21 has been amended to clarify the infrastructure will enable new sustainable development which integrates with its surroundings.</b>
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 &amp; 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 &amp; 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.
<b>Policy NPPF1: Sustainable Development</b>			
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"> <li>▪ infrastructure for transport, telecoms, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)</li> <li>▪ health, security, community/cultural infrastructure and other local facilities</li> <li>▪ climate change mitigation &amp; adaptation, conservation &amp; enhancement of the natural &amp; historic environment, including landscape</li> </ul> <p>Crucially, Local Plans should:</p> <ul style="list-style-type: none"> <li>▪ plan positively for the development &amp; infrastructure required in the area to meet the objectives, principles &amp; policies of the Framework</li> <li>▪ 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</li> <li>▪ be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;</li> <li>▪ indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map</li> <li>▪ 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</li> </ul>	<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"> <li>▪ identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation</li> <li>▪ identify land where development would be inappropriate, for instance because of its environmental or historic significance</li> <li>▪ contain a clear strategy for enhancing the natural, built and historic environment and supporting Nature Improvement Areas where they have been identified</li> </ul>	
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"> <li><i>1. How they have attempted to avoid such conflicts</i></li> <li><i>2. How they have minimised any unavoidable adverse impacts</i></li> <li><i>3. How they will compensate for any residual negative impacts</i></li> <li><i>4. How the benefits of the development outweigh any residual negative impacts</i></li> </ol> <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)
<b>Key Diagram</b>			
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. <b>As this has caused unintended confusion this line has been removed.</b> 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. <b>For clarity this has also been included in the supporting text to Policy CS25 to avoid the need to cross-reference.</b>
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.
<b>Supporting Text Comments</b>			
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 <del>co-operating over the future development of</del> working together to agree the strategic priorities for lands on the Blackpool/Fylde southern boundary <del>to deliver a sustainable extension to the Blackpool urban area</del> 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. <b>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.</b>
081	Steve Arnold, Noble Organisation	<p>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.</p> <p>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.</p>	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. <b>The supporting text to policy CS2 specifically identifies this source within the windfall supply.</b>
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

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		<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. <b>Policy CS2 has been updated to reflect this new evidence.</b></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). <b>The supporting text to Policy CS2 acknowledges the need for an appropriate buffer to accord with NPPF.</b></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>



Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
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. <b>The supporting text in the Proposed Submission acknowledges the need to apply an appropriate buffer to accord with NPPF.</b> 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 &amp; 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. <b>The supporting text to Policy CS2 has been reworded to provide clarity on the sources of supply, including the buffer of sites.</b> A specific Brownfield target is not considered necessary.</p> <p>The Council has recently received funding to help bring empty properties back into use. <b>The supporting text to policy CS2 now specifically identifies this source within the windfall supply.</b></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 &amp; CS27: Marton Moss.</p> <p>Specific sites are identified in the SHLAA (available to view at <a href="http://www.blackpool.gov.uk/corestrategy">www.blackpool.gov.uk/corestrategy</a>). 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 &amp; 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 &amp; 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&amp;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 &amp; 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. <b>Policy CS2 has been amended to reflect this new evidence.</b> 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&amp;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 &amp; 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&amp;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. <b>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.</b></p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<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><b>The supporting text to Policy CS2 in the Proposed Submission acknowledges the need for an appropriate buffer to accord with NPPF.</b> 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"> <li>▪ <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></li> <li>▪ <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></li> <li>▪ <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></li> <li>▪ <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></li> </ul> <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>

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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>
<b>Supporting Text Comments</b>			
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 &amp; 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 <sup>th</sup> 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. <b>Clarification has been provided.</b>
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. <b>The figures in the Proposed Submission reflect the latest projections in the 2013 SHMA evidence.</b>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
<b>Policy CS3: Economic Development and Employment</b>			
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>

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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. <b>Reference to enabling development in the supporting text has been amended in the Proposed Submission to help provide further clarity.</b></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&amp;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&amp;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&amp;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&amp;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&amp;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&amp;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"> <li>▪ Difficulties arising from inappropriate vehicle movements i.e. the introduction of HGV's into an established residential community.</li> <li>▪ The site is unlikely to be attractive to B8 logistics operators due to the site's distance to other major conurbations and its ability</li> </ul>	<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&amp;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"> <li>• 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.</li> <li>• It is necessary to provide an appropriate profile of sites</li> </ul>

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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 &amp; Preston.</p> <ul style="list-style-type: none"> <li>▪ Restrictions on operational activity due to impact on amenity of adjacent housing &amp; holiday Caravan Park.</li> <li>▪ More strategically located sites on the M6 Corridor.</li> <li>▪ Funder’s reluctance to invest in a site that is poorly located and has conflicting neighbourhood land uses.</li> <li>▪ Significant demolition and site remediation costs would require higher values from alternative land uses to enable employment uses to be developed.</li> <li>▪ 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.</li> <li>▪ Not a financially acceptable level of return for NS&amp;I.</li> <li>▪ Poor prominence and access.</li> </ul> <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&amp;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"> <li>• 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.</li> <li>• 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).</li> <li>• Demolition and other costs would need to be evidenced in viability appraisals.</li> </ul> <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&amp;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"> <li>• Opportunities to redevelop the existing office complex with new employment premises which meet modern occupier needs are considered in the 2013 ELR.</li> <li>• Policy DE1 of the current Local Plan identifies the</li> </ul>

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		<ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ 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.</li> <li>▪ 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.</li> </ul> <p><u>Core Strategy Comments:</u> Object to identification of NS&amp;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"> <li>• The evidence base considers the office market within Blackpool as well as recent take-up and occupancy levels across the main employment areas.</li> <li>• 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.</li> <li>• 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.</li> </ul> <p>As previously stated, the NS&amp;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&amp;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&amp;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&amp;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&amp;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&amp;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&amp;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&amp;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&amp;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&amp;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>



Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<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&amp;I and bringing forward a sustainable mixed use scheme.</p> <p><u>Proposed Changes:</u> Object to the designation of the NS&amp;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&amp;I site should not be identified as an Employment Site in Figs 11 &amp; 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>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<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&amp;I site that there is unlikely to be demand for the development of the entire site for high quality modern business facilities. Figures 11 &amp; 18 should identify the NS&amp;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>	
<b>Supporting Text Comments</b>			
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 21<sup>st</sup> 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>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<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 &amp; 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><b>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.</b></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). <b>The policy has been amended to provide further clarity.</b></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><b>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.</b></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>

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		<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>

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		<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><b>The policy has been amended accordingly in line with the NPPF. Part 1(c) has been removed.</b></p>

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		<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 &amp; 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: <a href="http://www.cpre.org.uk/resources/farming-and-food/local-foods/item/2897-from-field-to-fork">http://www.cpre.org.uk/resources/farming-and-food/local-foods/item/2897-from-field-to-fork</a>. Recommendations 5 &amp; 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>



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		<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 &amp; 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><b>The text has been amended accordingly in line with the NPPF.</b></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 &amp; 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><b>The policy has been amended accordingly in line with the NPPF. Part 1(c) has been removed.</b></p>

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		<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. <b>The policy has been amended accordingly in line with the NPPF. Part 1(c) has been removed.</b>
<b>Supporting Text Comments</b>			
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.

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005	Mrs Gillian Wilsden	<p>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.</p>	<p>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.</p>
069	Ms Heather Lindley, LS Retail	<p><u>The Role of Blackpool Retail Park &amp; Other Out of Centre Locations</u>  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><b>The policy has been amended accordingly in line with the NPPF. Part 1(c) has been removed.</b></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:</p> <ol style="list-style-type: none"> <li>1. Identifies the existing retail parks, free-standing retail warehouses and grocery superstores;</li> <li>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;</li> <li>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.</li> </ol> <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 &amp; 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>Pargraph 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><b>Reference has now been made that the retail evidence base will be updated periodically and recommendations reviewed.</b></p> <p><b>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.</b></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>

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<b>Policy CS5: Connectivity</b>			
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. <b>Wording of policy changed to reflect this.</b>
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.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
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.
<b>Supporting Text Comments</b>			
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.	<b>Supporting text now includes reference to NICE guidance PH8 and PH41. Policy wording changed to reflect direction of guidance.</b>
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><b>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.</b></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. <b>Changed relevant text (now para. 5.90) to read "New developments should prioritise ease of</b></p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<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><b>access by sustainable transport modes especially walking and cycling, to manage congestion and minimise future carbon emissions."</b></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><b>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.</b></p> <p>Notwithstanding above, <b>reference to the retrofitting SuDS has also been included in policy CS9: Water Management.</b></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 &amp; 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"> <li>▪ 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;</li> <li>▪ 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;</li> <li>▪ encourage multiple benefits from use of land in urban and rural areas recognising that some open land can perform many functions</li> </ul> <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. <b>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.</b></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. <b>Reference has been made in the supporting text to the need for new provision to address identified deficiencies in the future</b>, 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. <b>Part 3 of the policy has been amended in line with the suggested text.</b>

#### 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, <b>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.</b> 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 &amp; protect relatively tranquil places (NPPF para 123) "Planning policies &amp; 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><b>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).</b></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	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>	Support noted for the definition provided.

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 &amp; 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)
<b>Policy CS7: Quality of Design</b>			
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 &amp; 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"> <li>▪ Point 1c add <i>'and encourage healthier lifestyles and activity'</i></li> <li>▪ Point 1f incorporate well integrated car and cycle parking... <i>'in both commercial and residential developments'</i>.</li> </ul>	<p>Covered in Policy CS14: Health &amp; 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) <a href="http://www.cpre.org.uk/resources/housing-and-planning/housing/item/1940-">http://www.cpre.org.uk/resources/housing-and-planning/housing/item/1940-</a> 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><b>The policy text has been amended.</b></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.
<b>Policy CS8: Heritage</b>			
<b>Policy Comments</b>			
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 <b>CS8 Heritage</b> , 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. <b>Reference added.</b>

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.  <b>The Sustainable Design and Renewable and Low Carbon</b>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
			<p><b>Energy policy*</b> 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 <b>to reflect the concerns raised and to take account of the Blackpool Viability Study undertaken in 2013/4.</b></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"> <li>▪ Minimising demand and cutting unnecessary use</li> <li>▪ Increasing efficiency of use</li> <li>▪ Increasing use of renewable energy</li> <li>▪ Continuing use of fossil fuels to be as clean and efficient as possible, e.g. incorporating community heat &amp; power where possible.</li> </ul> <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><b>The Sustainable Design and Renewable and Low Carbon Energy policy has been amended to make specific reference to the energy hierarchy.</b></p> <p><b>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.</b></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 &amp; 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"> <li>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.</li> <li>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.</li> <li>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.</li> </ul>	<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, <b>a separate policy on Water Management has been developed to take account of the concerns raised.</b></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.
<b>Policy CS10: Planning Obligations</b>			
<b>Policy Comments</b>			
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.
<b>Supporting Text Comments</b>			
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)
<b>Policy CS11: Sustainable Neighbourhoods</b>			
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 &amp; 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 &amp; 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. <b>For clarity, however, the 'Talbot' neighbourhood has been renamed 'Talbot and Brunswick' in the Sustainable Neighbourhoods policy.</b>
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. <b>For clarity, however, the 'Talbot' neighbourhood has been renamed 'Talbot and Brunswick' in the Sustainable Neighbourhoods policy.</b>
<b>Policy CS12: Housing Mix , Density and Standards</b>			
<b>Policy Comments</b>			
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.
<b>Supporting Text Comments</b>			
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.
<b>Policy CS13: Affordable Housing</b>			
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. <b>Policy CS13 has been amended accordingly.</b>
<b>Policy CS14: Health and Education</b>			
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 <b>and their smaller local delivery primary care units providing accessible healthcare to neighbourhoods.</b>"</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><b>This text has been included.</b></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"> <li>▪ Increasing capacity at Marton Primary School</li> <li>▪ Undertaking extensive work at Mereside Primary School to facilitate 2 form entry (previously only 1 form entry)</li> <li>▪ A school as part of the Whyndyke Farm application</li> <li>▪ The new Primary School in Central Blackpool which may have a knock on effect and absorb some of the requirement.</li> </ul> <p><b>Detail has now been included in the supporting text to the policy.</b></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><b>The word 'Trust' has been deleted.</b></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.
<b>Policy CS15: Gypsy &amp; Travellers and Travelling Showpeople</b>			
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. <b>The policy has been amended to incorporate additional criteria in line with the identified CLG guidance.</b></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)
<b>Policy CS16: Blackpool Town Centre</b>			
<b>Town Centre Boundary Comments</b>			
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.
<b>Policy Comments</b>			
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.
<b>Policy CS17: Winter Gardens</b>			
<b>Policy Comments</b>			
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	<b>Cycle parking has been added.</b>
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)
<b>Policy CS18: Central Business District (Talbot Gateway)</b>			
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.
<b>Policy CS19: Leisure Quarter (Former Central Station Site)</b>			
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. <b>Part 1d of the policy has been amended for clarity.</b>
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. <b>It is acknowledged that the chapter heading has caused confusion and this has been amended.</b></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.
<b>Supporting Text Comments</b>			
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><b>Paragraph 7.24 has been amended.</b></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.
<b>Policy CS21: Arrival and Movement</b>			
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	<b>Policy revised to include for measures to increase the use of cycling and walking.</b>
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><b>Paragraphs on parking have been included in policy to address parking shortfall in the town centre and the inner areas.</b></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><b>Revision to text (now para. 5.67) to include that the arrival experience should be "improved".</b></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><b>Text revised to include clear signage for pedestrian routes between car parks and visitor attractions.</b></p>
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Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
<b>Policy CS22: Key Resort Gateways</b>			
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.
<b>Supporting Text Comments</b>			
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)
<b>Policy CS23: Promenade Holiday Accommodation</b>			
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. <b>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.</b></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. <b>The Proposed Submission policy no longer identifies the areas to give more flexibility should we undertake an SPD review.</b></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. <b>To address some confusion, the policy has been simplified by combining CS23 &amp; CS24 and referring to these as 'main holiday accommodation areas'.</b> 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>



Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<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 &amp; 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>
<b>Policy CS24: Off Promenade Holiday Accommodation</b>			
<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 & Osborne 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.
<b>Comments on the alternative options previously discounted</b>			
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.
<b>Policy / Supporting Text Comments</b>			
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). <b>The Proposed Submission has been amended to provide clarity with respect to change of use of holiday accommodation.</b> The Council also issued additional guidance on its website (<a href="http://www.blackpool.gov.uk/holidayaccommodation">www.blackpool.gov.uk/holidayaccommodation</a>) 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><b>The Proposed Submission policy no longer identifies the general areas to give more flexibility should we undertake an SPD review.</b></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. <b>To address some confusion, the policy wording and supporting text has been amended in the Proposed Submission to provide more clarity.</b></p> <p>The Council has also issued additional guidance on its website (<a href="http://www.blackpool.gov.uk/holidayaccommodation">www.blackpool.gov.uk/holidayaccommodation</a>) 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. <b>The Proposed Submission policy and further guidance published on the website takes the opportunity to clarify this</b> so that banks and commercial agents are not misinterpreting the policy.</p> <p>Lack of lending from banks reflects the difficult economic</p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<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"> <li>▪ It is devaluing the existing businesses and making them harder to sell</li> <li>▪ Prospective purchasers believe that it is unsafe to buy a business excluded from the holiday zone</li> <li>▪ Holiday flat owners on Coronation Street do not need change of use to become permanent. This is having an adverse</li> </ul>	<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. <b>The Proposed Submission policy no longer identifies the general areas to give more flexibility should we undertake an SPD review.</b></p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<p>effect on the holiday area</p> <ul style="list-style-type: none"> <li>▪ 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</li> <li>▪ Improvement grants would not be considered for properties outside the zone</li> <li>▪ 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</li> <li>▪ The continuing and deliberate de-generation by this Council to parts of Blackpool that were once extremely busy holiday trading areas must be stopped.</li> </ul> <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. <b>The Proposed Submission policy and supporting text has been amended to provide more clarity so that people are not misinterpreting the policy.</b></p> <p>The Council has also issued additional guidance on its website (<a href="http://www.blackpool.gov.uk/holidayaccommodation">www.blackpool.gov.uk/holidayaccommodation</a>) 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 &amp; 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. <b>The Proposed Submission policy no longer identifies the general areas to give more flexibility should we undertake an SPD review.</b></p> <p>These letters show there is confusion by some people about the policy approach. <b>The Proposed Submission policy and supporting text has been amended to provide more clarity so that people are not misinterpreting the policy.</b></p> <p>The Council has also issued additional guidance on its website (<a href="http://www.blackpool.gov.uk/holidayaccommodation">www.blackpool.gov.uk/holidayaccommodation</a>) 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>



Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<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 &amp; 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.	<b>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.</b>
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. <b>However, cross reference to Policy CS9 Water Management has been inserted for clarification.</b></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. <b>That said some minor amendments have been made to paragraph 8.3 to more closely reflect the wording of the MOU.</b></p> <p><b>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.</b></p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
<b>Policy CS25: South Blackpool Employment Growth</b>			
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&amp;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&amp;I Site for employment within the core strategy period is remote.</p> <p>Policy CS25(2) should recognise mixed use development on the NS&amp;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. <b>For clarity this is now also acknowledged in the supporting text to Policy CS25.</b></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. <b>For clarity this is now also acknowledged in supporting text to Policy CS25.</b></p>
<b>Supporting Text Comments</b>			
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)
<b>Policy CS26: South Blackpool Housing Growth</b>			
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.	
<b>Policy CS27: Marton Moss</b>			
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: <a href="http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx">http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx</a>  <a href="http://locality.org.uk/">http://locality.org.uk/</a>
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: <a href="http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx">http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx</a>  <a href="http://locality.org.uk/">http://locality.org.uk/</a>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<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: <a href="http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx">http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx</a></p> <p><a href="http://locality.org.uk/">http://locality.org.uk/</a></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>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
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><a href="http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx">http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx</a></p> <p><a href="http://locality.org.uk/">http://locality.org.uk/</a></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.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
			<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:  <a href="http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx">http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx</a>   <a href="http://locality.org.uk/">http://locality.org.uk/</a></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

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
			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.

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<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><a href="http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx">http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx</a></p> <p><a href="http://locality.org.uk/">http://locality.org.uk/</a></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:  <a href="http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx">http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx</a>  <a href="http://locality.org.uk/">http://locality.org.uk/</a>
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: <a href="http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx">http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx</a>  <a href="http://locality.org.uk/">http://locality.org.uk/</a>
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"> <li>Where are the geographic boundaries that will indentify appropriate forum members?</li> </ul>	In preparing Neighbourhood Plans the government have given the responsibility to local communities to establish neighbourhood forums and develop neighbourhood plans

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		<ul style="list-style-type: none"> <li>▪ Who will decide those boundaries?</li> <li>▪ 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?</li> <li>▪ What role will the neighbourhood forum have in any planning development decision making?</li> <li>▪ Will any new development include utilities infrastructure to existing residents?</li> <li>▪ Is there any evidence nationally that would advocate for planning development to be driven successfully through a neighbourhood forum?</li> </ul> <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:  <a href="http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx">http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx</a>   <a href="http://locality.org.uk/">http://locality.org.uk/</a></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>

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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.

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		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.

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		<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><a href="http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx">http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx</a></p> <p><a href="http://locality.org.uk/">http://locality.org.uk/</a></p>

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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:  <a href="http://www.blackpool.gov.uk/Residents/Planning-">http://www.blackpool.gov.uk/Residents/Planning-</a>



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			<a href="http://environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx">environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx</a>  <a href="http://locality.org.uk/">http://locality.org.uk/</a>
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><a href="http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx">http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx</a></p> <p><a href="http://locality.org.uk/">http://locality.org.uk/</a></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: <a href="http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx">http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx</a>  <a href="http://locality.org.uk/">http://locality.org.uk/</a>
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>

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		<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><a href="http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx">http://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/New-Blackpool-local-plan.aspx</a></p> <p><a href="http://locality.org.uk/">http://locality.org.uk/</a></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

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<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 &amp; is being left to rot when it could &amp; 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>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<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><b>Point 1 of the policy revised accordingly.</b></p> <p><b>Part 2 of the policy revised to emphasise integration of the airport with sustainable modes of transport.</b></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><b>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.</b></p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<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><b>Objective 12 has been amended to include reference to improving aspirations.</b></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 &amp; 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 &amp; 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>	Comments noted.

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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"> <li>▪ 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</li> <li>▪ take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.</li> </ul> <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"> <li>▪ Regulatory approval</li> <li>▪ Environmental constraints <ul style="list-style-type: none"> <li>- Does the receiving watercourse/environment have the capacity to accept additional flows without causing environmental damage?</li> <li>- Small river : large development</li> </ul> </li> <li>▪ Environmental consent and permits <ul style="list-style-type: none"> <li>- Timescales involved in the construction/delivery of new processes to meet new consents or permits</li> </ul> </li> <li>▪ Planning approval <ul style="list-style-type: none"> <li>- 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</li> <li>- Historical local resistance to the expansion of utilities assets</li> <li>- Planning application approval restrictions/conditions delay implementation of supporting infrastructure assets</li> </ul> </li> <li>▪ Land acquisition <ul style="list-style-type: none"> <li>- Timescales involved in the purchased land needs</li> <li>- Land may not be available for expansion due to the encroachment of development</li> </ul> </li> <li>▪ Access into the highway <ul style="list-style-type: none"> <li>- Limitations from the highway departments for road works</li> </ul> </li> <li>▪ Environmental restrictions bird breeding or nesting seasons;</li> </ul>	

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<p>great crested newts; badgers etc</p> <ul style="list-style-type: none"> <li>▪ Implementation and commissioning restrictions Planning application approval conditions; working hours etc. Environmental consents/permits conditions Its psychical delivery [Reason: Ensure timely delivery of development and infrastructure to protect the good quality of life and the environment]</li> </ul>	
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. <b>'and Brunswick' has been added in the policy and Figure 15 for clarity.</b></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>	

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
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>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
		<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. <b>The relevant sections of the Monitoring and Implementation Plan have been amended and the indicators clearly defined.</b></p>

Ref.	Name/ Company	Comment	Council Response (Amendments to plan in bold)
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. <b>Wording and illustrative plans have been amended in the Proposed Submission to provide more clarity.</b></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>