

# Public Document Pack

## Blackpool Council

14 April 2017

To: Councillors Benson, Blackburn, Cain, Campbell, Cross, Jackson, Kirkland, Smith, I Taylor and Mrs Wright

The above members are requested to attend the:

### **EXECUTIVE**

Monday, 24 April 2017 at 6.00 pm  
in Committee Room A, Town Hall, Blackpool

### **A G E N D A**

#### **ADMISSION OF THE PUBLIC TO COMMITTEE MEETINGS**

The Head of Democratic Governance has marked with an asterisk (\*) those items where the Committee may need to consider whether the public should be excluded from the meeting as the items are likely to disclose exempt information.

The nature of the exempt information is shown in brackets after the item.

#### **1 DECLARATIONS OF INTEREST**

Members are asked to declare any interests in the items under consideration and in doing so state:

(1) the type of interest concerned; and

(2) the nature of the interest concerned

If any member requires advice on declarations of interests, they are advised to contact the Head of Democratic Governance in advance of the meeting.

#### **2 BLACKPOOL LOCAL PLAN PART 2: SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES DEVELOPMENT PLAN DOCUMENT - REGULATION 18 SCOPING DOCUMENT AND CALL FOR SITES** (Pages 1 - 128)

#### **3 REVIEW OF THE HOLIDAY ACCOMMODATION SUPPLEMENTARY PLANNING DOCUMENT (SPD)** (Pages 129 - 264)

**4 \*BUSINESS LOANS FUND**

(Pages 265 - 270)

(This item to be considered in private by virtue of Paragraph 3 of Schedule 12a of the Local Government Act 1972 as the report contains information relating to the financial or business affairs of any particular person (including the authority holding that information))

It is not in the public interest to disclose this information.

Notification has been given on the 20 March 2017 that this item was to be considered in private and no representations have been received in response to this notification.

**5 \*PURCHASE OF PROPERTY**

(Pages 271 - 280)

(This item to be considered in private by virtue of Paragraph 3 of Schedule 12a of the Local Government Act 1972 as the report contains information relating to the financial or business affairs of any particular person (including the authority holding that information))

It is not in the public interest to disclose this information because this may restrict the authority's ability to obtain value for money when negotiating the purchase of property.

Notification has been given on the 20 March 2017 that this item was to be considered in private and no representations have been received in response to this notification.

**Venue information:**

First floor meeting room (lift available), accessible toilets (ground floor), no-smoking building.

**Other information:**

For queries regarding this agenda please contact Lennox Beattie, Executive and Regulatory Manager, Tel: (01253) 477157, e-mail [lennox.beattie@blackpool.gov.uk](mailto:lennox.beattie@blackpool.gov.uk)

Copies of agendas and minutes of Council and committee meetings are available on the Council's website at [www.blackpool.gov.uk](http://www.blackpool.gov.uk).

<b>Report to:</b>	<b>EXECUTIVE</b>
<b>Relevant Officer:</b>	Alan Cavill, Director of Place
<b>Relevant Cabinet Member:</b>	Councillor Mark Smith, Cabinet Member for Regeneration, Enterprise and Economic Development
<b>Date of Meeting:</b>	24 April 2017

## **BLACKPOOL LOCAL PLAN PART 2: SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES DEVELOPMENT PLAN DOCUMENT - REGULATION 18 SCOPING DOCUMENT AND CALL FOR SITES**

### **1.0 Purpose of the report:**

- 1.1 The new Blackpool Local Plan comprises Part 1: Core Strategy, which was adopted in January 2016 and **Part 2: Site Allocations and Development Management Policies** document. This report presents to members the Regulation 18 Scoping document for consultation on Part 2 of the Local Plan along with the 'Call for Sites' form for publication and the Sustainability Appraisal Scoping Report (March 2017).

### **2.0 Recommendation(s):**

- 2.1 To approve the Regulation 18 Scoping Document for public consultation for a period of 6 weeks (refer Appendix 2a).
- 2.2 To approve the 'Call for Sites' form (refer Appendix 2b) for publication to inform the subsequent land allocations to be included in Part 2 of the Local Plan.
- 2.3 To approve the Sustainability Appraisal Scoping Report (March 2017) and agree to its publication on the Council's Website (refer Appendix 2c).

### **3.0 Reasons for recommendation(s):**

- 3.1 To progress the preparation of the statutory planning framework to support Blackpool's future regeneration and growth.
- 3.2a Is the recommendation contrary to a plan or strategy adopted or approved by the Council? No

3.2b Is the recommendation in accordance with the Council's approved budget? Yes

3.3 Other alternative options to be considered:

Where appropriate options will be considered as Part 2 of the Local Plan is developed in line with the statutory requirements and regulations for Local Plan preparation.

**4.0 Council Priority:**

4.1 The relevant Council Priority is:

"The economy: Maximising growth and opportunity across Blackpool"

**5.0 Background Information**

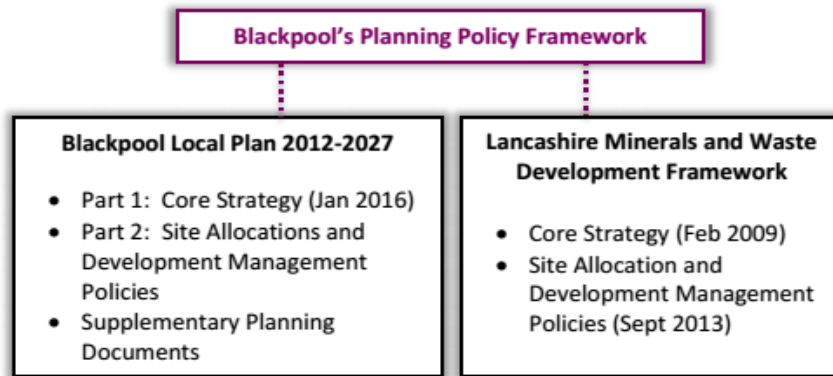
5.1 The Council has started preparing the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Development Plan Document (from now on referred to as 'Local Plan Part 2'). To support the preparation and development of Part 2, a Member and Officer Working Group has been set up comprising the Deputy Leader of the Council (Tourism, Economic Growth and Jobs), Cabinet Member for Regeneration, Enterprise and Economic Development, members of the Planning Committee, officers from the Policy Strategy Team and other supporting officers. The first meeting of this group took place on 22 March 2017.

5.2 The Local Plan Part 2 will:

- Allocate sites for new development including housing, employment and retail and identify areas for safeguarding and protection e.g. public open space, greenbelt;
- Designate areas where particular policies will apply e.g. local centres;
- Include policies to be applied when considering applications for development e.g. design, amenity and transport.

5.3 Blackpool’s Planning Policy Framework is illustrated in Figure 1 below.

**Figure 1**



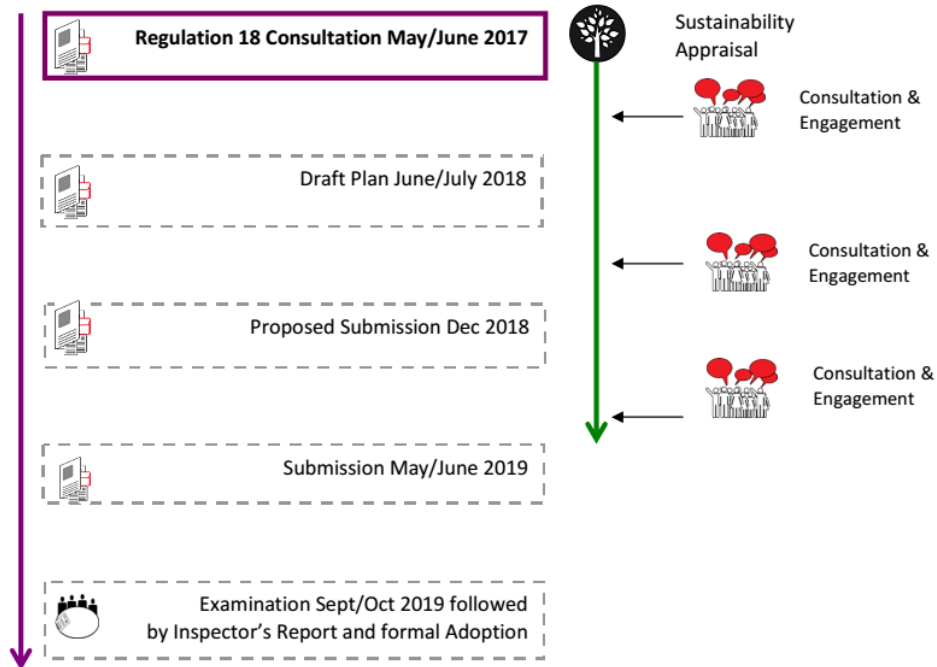
The new Local Plan for 2012 – 2027 comprises two parts: Part 1 is the Core Strategy which sets out the strategic policies guiding development which was adopted in January 2016 and Part 2 is the Site Allocations and Development Management Policies document as described above in paragraph 5.2.

The policies contained within the Local Plan Part 2 provide further detail to the strategic policies set out in the Council’s Local Plan Part 1: Core Strategy.

Both the Core Strategy and Site Allocations and Development Management Policies will eventually replace the Blackpool Local Plan (2006). Until the Local Plan Part 2 is adopted, a number of development management policies set out in the Blackpool Local Plan (2006) will continue to be “saved” and considered alongside Core Strategy policies when determining planning applications.

There are a number of stages we must follow in preparing the Local Plan Part 2 (figure 2). Each stage presents an opportunity for the community and other stakeholders to be involved in choosing the right planning policies for Blackpool and identifying sites for development or protection.

**Figure 2 : Proposed Timeline**



#### 5.4 Regulation 18 Consultation Scoping Document

The Regulation 18 Scoping Document is the first consultation stage of the Local Plan Part 2 preparation process. The document at Appendix A sets out those policies which are considered necessary to guide development in Blackpool; protect and safeguard specific areas; and detailed policies to be applied when considering planning applications. A number of policy titles are proposed in Section 4 of Appendix A along with a brief explanation of what the policy should cover. The document will be subject to public consultation for a period of 6 weeks where comments will be invited on the proposed policies and also whether any additional policies need to be included.

#### 5.5 Marton Moss

Policy CS26 of the Blackpool Local Plan Part 1: Core Strategy promotes a neighbourhood planning approach for the remaining lands at Marton Moss to develop neighbourhood policy which supports the retention and enhancement of the areas distinctive character, whilst identifying in what circumstances development, including residential may be acceptable.

It is the intention to engage with the Marton Moss community in the coming months

to establish whether the community want to produce their own Neighbourhood Plan. If the community do not want to prepare a Neighbourhood Plan, local planning policy for the Marton Moss area will be developed as part of the Local Plan Part 2 with a specific chapter relating to Marton Moss.

## 5.6 **Call for Sites**

At the same time as the Regulation 18 Scoping consultation, it is proposed that the Council undertake a 'Call for Sites' to inform the allocation of sites for development or protection in the Local Plan Part 2.

A Call for Sites involves asking local residents, businesses, landowners and developers to identify potential sites for development, or protection from development, in Blackpool. The form at Appendix B sets out the information that is required and will be published for any interested party to complete and submit to the Planning Authority. Sites either brownfield or greenfield, in the urban area or in the countryside that may have development potential, or has special value that means it should be protected can be submitted for consideration. This can include for example sites for housing, employment, retail, leisure, health, community uses, open space, sites for gypsies and travellers, sites for travelling showpeople, or a mix of uses.

Sites submitted will be considered for:

- Allocation/designation in Part 2 of the Blackpool Local Plan
- Inclusion in the Blackpool Housing and Employment Land Availability Assessment, which forms part of the Local Plan evidence base, if housing or economic development uses are proposed
- Inclusion in the Council's Brownfield Register, if housing is proposed on brownfield land

Putting a site forward does not guarantee that the Council will allocate it, or support its development in the future, as all sites will need to be assessed in accordance with relevant planning policies and other considerations including sustainability and accessibility criteria.

## 5.7 **Sustainability Appraisal (SA) Scoping Report**

The Sustainability Appraisal Scoping Report is designed to draw together information about Blackpool to establish a sustainability baseline and determine the key challenges for the area.

The information compiled in the Sustainability Appraisal Scoping Report will form the foundations of the sustainability appraisal which will be used to test how well the Local Plan Part 2 aligns with sustainability objectives.

The main objectives of the Sustainability Appraisal are to address the following:

- Ensure that the Local Plan Part 2 accounts for policies, plans and programmes on an international, national and local scale;
- Establish an updated baseline assessment of Blackpool, outlining the environmental, social and economic characteristics and raising any issues for which the plan will need to take account;
- Creating a sustainability framework that respects the sustainability of Blackpool;
- Testing sites and policies as part of the Local Plan Part 2 against the Blackpool sustainability framework to assess the impact of the policy options;
- Ensuring that realistic and meaningful alternative options are tested as part of the process, reflecting on potential improvements to the Local Plan Part 2.

5.8 It is a requirement of Regulation 12 (5) of the SEA Regulations that the Environment Agency, Historic England and Natural England are consulted on the Sustainability Appraisal Scoping Report. These bodies were consulted in early January for a period of 5 weeks and their comments have been incorporated into the final Sustainability Appraisal Scoping Report.

5.9 Does the information submitted include any exempt information? No

5.10 **List of Appendices:**

Appendix 2a - Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Development Plan Document - Regulation 18 Scoping Document

Appendix 2b - Call for Sites Form

Appendix 2c - Sustainability Appraisal (SA) Scoping Report (March 2017)

6.0 **Legal considerations:**

6.1 The Local Plan Part 2, when adopted by the Council will be a key spatial document forming part of the Council's statutory Local Plan.

7.0 **Human Resources considerations:**

7.1 The Local Plan Part 2 is being resourced by existing staff within the Planning Strategy Team.



**8.0 Equalities considerations:**

8.1 As part of plan preparation it is the intention to undertake an Equality Assessment taking into account all relevant and appropriate equality considerations.

**9.0 Financial considerations:**

9.1 The work is being undertaken within existing budgetary provisions.

**10.0 Risk management considerations:**

10.1 The Local Plan Part 2 is a key document which along with Part 1: Core Strategy (Adopted January 2016) will provide the statutory planning framework to enable and assist the delivery of Blackpool's future development requirements. Without its progress, acquisition, land assembly and planning approval for key regeneration and development projects will be undermined and delayed. The Council needs to ensure that it has a planning framework that is directing development within the borough which reflects the community and elected members priorities and needs and to avoid national policy being the principle basis for making decisions. The latter could lead to an increase in appeals if applications are received proposing development which is not in line with the priorities and needs of Blackpool.

**11.0 Ethical considerations:**

11.1 No adverse ethical considerations. The Local Plan Part 2 will contribute to the Council priorities set out in the Council Plan and will be subject to an equality assessment.

**12.0 Internal/ External Consultation undertaken:**

12.1 Consultation will be undertaken in line with the Council's Statement of Community Involvement and in accordance with the statutory requirements and regulations for Local Plan preparation.

**13.0 Background papers:**

13.1 Blackpool Local Plan Part 1: Core Strategy (adopted 2016)

Blackpool Local Plan (2006) 'Saved Policies'

**14.0 Key decision information:**

14.1 Is this a key decision? Yes

14.2 If so, Forward Plan reference number: 7/2017

14.3 If a key decision, is the decision required in less than five days? No

14.4 If **yes**, please describe the reason for urgency:

**15.0 Call-in information:**

15.1 Are there any grounds for urgency, which would cause this decision to be exempt from the call-in process? No

15.2 If **yes**, please give reason:

**TO BE COMPLETED BY THE HEAD OF DEMOCRATIC GOVERNANCE**

**16.0 Scrutiny Committee Chairman (where appropriate):**

Date informed: 12 April 2017 Date approved:

**17.0 Declarations of interest (if applicable):**

17.1

**18.0 Executive decision:**

18.1

**18.2 Date of Decision:**

**19.0 Reason(s) for decision:**

19.1 **Date Decision published:**

20.0 **Executive Members in attendance:**

20.1

21.0 **Call-in:**

21.1

22.0 **Notes:**

22.1

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**Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Development Plan Document**

**Regulation 18 Scoping Document**

**1 Introduction**

**What is the Site Allocations and Development Management Policies Development Plan Document?**

- 1.1 The Council has started preparing the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Development Plan Document (from now on referred to as 'Local Plan Part 2').
- 1.2 The Local Plan Part 2 will:
  - Allocate sites for new development including housing, employment and retail and identify areas for safeguarding and protection e.g. public open space, greenbelt
  - Designate areas where particular policies will apply e.g. local centres
  - Include policies to be applied when considering applications for development e.g. design, amenity and transport

**How does the Local Plan Part 2 fit within Blackpool’s Planning Policy Framework?**

- 1.3 Blackpool’s Planning Policy Framework is illustrated in the figure below.

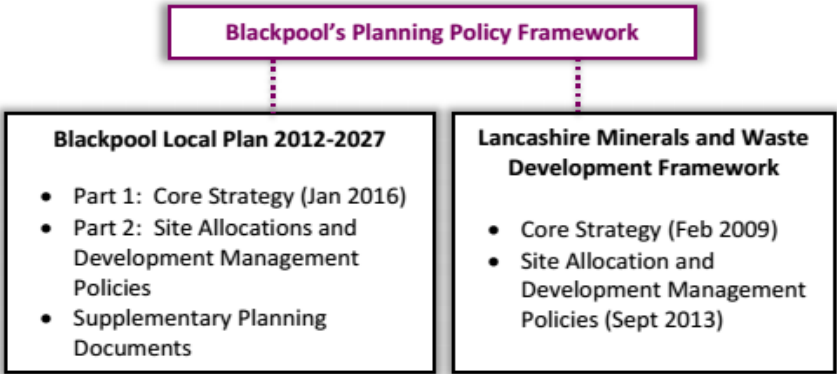
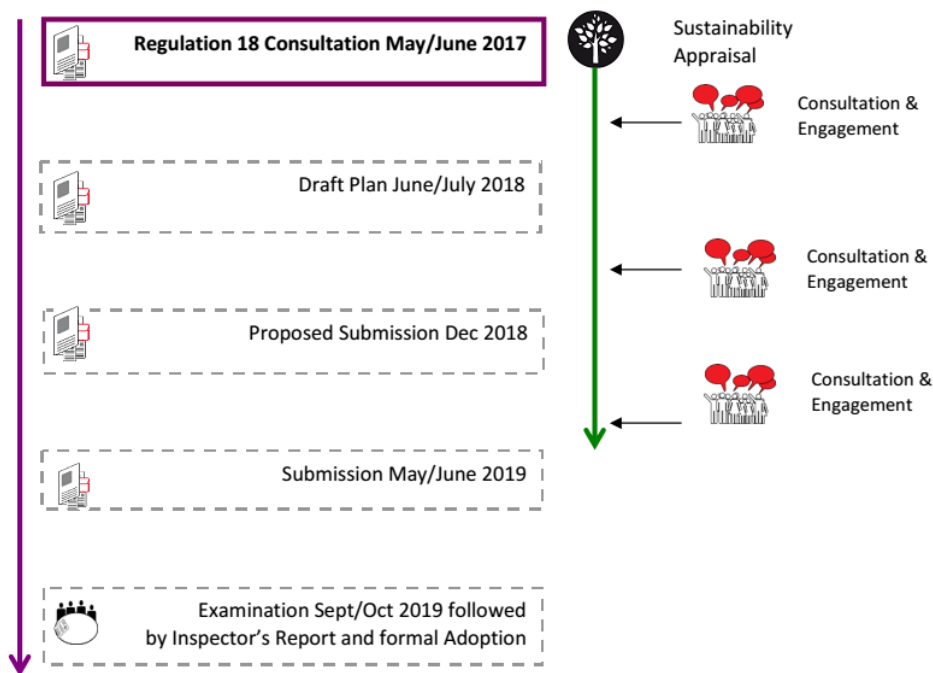


Figure 1: Blackpool’s Planning Policy Context

- 1.4 The new Local Plan for 2012 – 2027 comprises two parts: Part 1 is the *Core Strategy* which sets out the strategic policies guiding development which was adopted in January 2016 and Part 2 *Site Allocations and Development Management Policies* as described above.
- 1.5 The policies contained within the Local Plan Part 2 provide further detail to the strategic policies set out in the Council’s Local Plan Part 1: Core Strategy (adopted in January 2016). The Core Strategy can be found at: <https://www.blackpool.gov.uk/corestrategy>
- 1.6 In addition, Supplementary Planning Documents (SPDs) will be produced where necessary to support, or provide more detailed guidance on policies in the Local Plan. Some SPDs have already been adopted; these are detailed on the Council’s website.
- 1.7 Both the Core Strategy and Site Allocations and Development Management Policies will eventually replace the current Blackpool Local Plan (2006). Until the Local Plan Part 2 is adopted, a number of development management policies set out in the Blackpool Local Plan (2006) will continue to be “saved” and considered alongside Core Strategy policies when determining planning applications.
- 1.8 Alongside the Blackpool Local Plan, Lancashire County Council and the two Unitary Authorities of Blackpool and Blackburn with Darwen have prepared a Joint Lancashire Minerals and Waste Local Plan, which consists of a number of minerals and waste documents. This can be viewed at: [www.blackpool.gov.uk/mineralsandwaste](http://www.blackpool.gov.uk/mineralsandwaste)

**Preparing the Local Plan Part 2**

- 1.9 There are a number of stages we must follow in preparing the Local Plan Part 2 (figure 2). Each stage presents an opportunity for the community and other stakeholders to be involved in choosing the right planning policies for Blackpool and identifying sites for development or protection.



**Figure 2: Local Plan Part 2 Preparation Stages and Milestones**

## **This Consultation - Regulation 18 Scoping Document)**

- 1.10 This is the first consultation stage of the Local Plan Part 2 preparation process. The Council is seeking views on what policies the document ought to contain as we want to ensure we have the right planning policies for Blackpool. We have listed a number of policy titles in Section 5 and we invite your comments on the policies we propose to include in the plan. If you feel that there are any additional policies we should include please let us know.
- 1.11 At the same time as the Regulation 18 Scoping consultation, the Council is also undertaking a **Call for Sites**. Section 3 provides further information on this.

## **2 Sustainability Appraisal (SA) Scoping Report**

- 2.1 The SA Scoping Report is designed to draw together information about Blackpool to establish a sustainability baseline and determine the key challenges for the area.
- 2.2 The information compiled in the SA Scoping Report will form the foundations of the sustainability appraisal, which will be used to test how well the Local Plan Part 2 aligns with sustainability objectives.
- 2.3 The main objectives of the SA will be to address the following:
- Ensure that the Local Plan Part 2 accounts for policies, plans and programmes on an international, national and local scale.
  - Establish an updated baseline assessment of Blackpool, outlining the environmental, social and economic characteristics and raising any issues that the plan will need to account for.
  - Creating a sustainability framework that respects the sustainability of Blackpool.
  - Testing sites and policies as part of the Local Plan Part 2 against the Blackpool sustainability framework to assess the impact of the policy options.
  - Ensuring that realistic and meaningful alternative options are tested as part of the process, reflecting on potential improvements to the Local Plan Part 2.
- 2.4 The SA Scoping Report is available to view here: [www.blackpool.gov.uk/](http://www.blackpool.gov.uk/)

## **3 Call for Sites**

- 3.1 The Local Plan Part 2 will allocate sites for various uses including housing, employment and retail. As part of the development of the Local Plan Part 2 we will also be considering existing allocations including the Green Belt boundary, retail centres and public open space.
- 3.2 In order to identify sites, the Council is undertaking a '**Call for Sites**'. If you are aware of any site either brownfield or greenfield, in the urban area or in the Countryside that may have development potential or has special value that means you think it should be protected from certain types of development, or you would like to bring a site to our attention, please complete a Call for Sites Form which is available at: [www.blackpool.gov.uk/callforsites](http://www.blackpool.gov.uk/callforsites) . Please provide enough information to enable us to assess the site. A clear location map showing the precise boundaries of the site must accompany each form.

- 3.3 If you have previously submitted a site for consideration during previous Call for Sites consultations or your site is in the current Strategic Housing Land Availability Assessment (SHLAA) then there is no need to resubmit your site unless you have or additional information to provide.

#### 4 Development Management Policies that the Council think should be included in the Local Plan Part 2

- 4.1 The following table sets out a list of policies that we think should be included in the Local Plan Part 2 and provides a brief explanation of what the policy should cover.

Policy Topic	Further information
<b>Housing</b>	
New Housing Development	Identifies requirements for new housing development including floorspace standards.
Conversions and sub-division	Criteria for assessing proposals for conversion or sub-division for residential use including the Council's approach to HMOs
Gypsy and Traveller and Travelling Showpeople Sites	Identifies the target for new permanent and transit pitches and plots of over the plan period and identifies sites
Housing for Older People	Criteria for assessing proposals for housing with care for older people including
Open space in new residential development	Details requirements for open space in new residential development
Housing Development in Residential Gardens	Policy for garden development
Custom/Self Build	Guides custom/self-build housing development
Residential Institutions	Criteria for assessing proposals for residential institutions.
Student Accommodation	Criteria for assessing proposals for student accommodation.
<b>Economy</b>	
Hounds Hill	Area based policy guiding development at the Hounds Hill Shopping Centre
Town Centre – Zonal Policies	Directs appropriate development to different parts of the Town Centre
Leisure Zone	Directs appropriate development to the designated Leisure Zone within the Town Centre
Use of Upper Floors	Identifies appropriate uses for upper floors within the Town Centre
Local/District Centres	Guides development within designated centres to protect the vitality and viability of such centres.
Pay day loan/Betting Shops	Control of such uses within Blackpool's retail centres
Threshold for impact assessments	Identifies thresholds for the requirement of retail impact assessments
Industrial and Business Land Provision	Identifies appropriate development within the designated business/industrial areas.



Enterprise Zone	Area based policy guiding development at the Blackpool Airport Enterprise Zone
Visitor Attractions	Criteria for assessing proposals for visitor attractions
Blackpool Zoo	Area based policy guiding development at Blackpool Zoo
Amusement Arcades and Funfairs	Identifies appropriate locations for amusement arcades and funfairs
Central Promenade and Seafront	Guides development on the defined central promenade and seafront area
Restaurants /Cafes	Identifies appropriate locations for restaurant and cafés
Hot Food Takeaways	Criteria for assessing Hot Food Takeaways
<b>Design and Amenity</b>	
Strategic Views	Protect strategic views of the town such as those of Blackpool Tower
Shopfronts	Criteria to assess applications for shopfronts
Security Shutters	Criteria to assess applications for security shutters
Advertisements and Signs	Criteria to assess applications for advertisements and signs
Extensions and Alterations	Design requirements for extensions and alterations
Telecommunications	Criteria to assess telecommunications development
Residential and Visitor Amenity	To ensure development does not adversely affect residential and visitor amenity.
Public Health and Safety	To ensure development is not detrimental to public health and safety
Design	Detailed design policies
Landscape Design	Requirement to incorporate appropriate landscaping and benefits to biodiversity.
<b>Historic and Built Environment</b>	
Listed Buildings	Guides development affecting the character and appearance of Listed Buildings
Locally Listed Buildings	Guides development affecting the character and appearance of Locally Listed Buildings
Conservation Areas	Criteria to assess development in Blackpool's Conservation Areas.
Public Realm and Public Art	Support for high quality public realm and public art
<b>Environment</b>	
Development in the Countryside Area	Criteria to assess development in the Countryside Area including replacement dwellings and extensions to existing dwellings.
SSSIs	Protect SSSIs from inappropriate development
Other sites of nature conservation value	Ensure development does not destroy or adversely affect other sites of nature conservation value.

Protected species	Ensure development does not adversely affect any protected species
Open land meeting community and recreational needs	Protect existing open land that meeting community and recreational need and support appropriate development
Coast and Foreshore	Protect the coast and foreshore from inappropriate development.
Renewable Energy	Directs renewable energy development (including solar panels and wind turbines) to appropriate locations within the Borough.
<b>Community</b>	
Community Facilities	Protects existing provision of community facilities and directs new community facilities to appropriate locations.
Allotments	Policy to protect existing allotment provision and guide proposals for new allotments.
Victoria Hospital	Area based policy guiding development at the Victoria Hospital site
Blackpool and Fylde College	Area based policy guiding development at the Blackpool and the Fylde College Site, Bispham
<b>Transport</b>	
General development requirements	To ensure development considers the relevant transport requirements including parking standards, transport assessment, accessibility questionnaire, and travel plans.
Aerodrome Safeguarding	Sets out consultation requirements for development in Aerodrome Safeguarding Areas

#### **\*Marton Moss**

- 4.2 Policy CS26 of the Blackpool Local Plan Part 1: Core Strategy promotes a neighbourhood planning approach for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character, whilst identifying in what circumstances development including residential may be acceptable. We are intending to engage with the Marton Moss community in the coming months to establish whether the community want to produce their own Neighbourhood Plan. If the community do not want to prepare a Neighbourhood Plan, local planning policy for the Marton Moss area will be developed as part of the Local Plan Part 2 with a specific chapter relating to Marton Moss.

## **5 Evidence Base**

- 5.1 Planning policies need to be underpinned by robust evidence. Key existing evidence base documents for the Local Plan Part 2 are available to view at:  
<http://www.blackpool.gov.uk/evidencebase>
- 5.2 We also intend to undertake additional work to underpin the policies in the plan. These include:

- **Updated Retail Study** – to identify future retail floorspace requirements and establish a threshold for impact assessments for proposals that are out of centre and do not accord with an up-to-date plan.
- **Updated Employment Land Study** – to assess employment land take-up and current floorspace requirement
- **Strategic Housing and Economic Land Availability Assessment (SHELAA) -**
- **Open Space Assessment** – to build up on the existing evidence (Open Space, Sport & Recreation Audit and Position Statement 2014) to identify any deficiencies or oversupply that needs to be addressed
- **Viability Assessment** - to consider the economic viability of the identified sites and policies within the plan
- **Updated Infrastructure and Delivery Plan** – to update existing knowledge and evidence on the delivery of infrastructure.

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## Blackpool Local Plan Part 2: Call for Sites Form

Blackpool Council is asking local residents, businesses, landowners and developers to identify potential sites for development, or protection from development, in Blackpool.

Sites submitted will be considered for:

- Allocation/designation in Part 2 of the Blackpool Local Plan
- Inclusion in the Blackpool Housing and Employment Land Availability Assessment, which forms part of the Local Plan evidence base, if housing or economic development uses are proposed
- Inclusion in the Council's Brownfield Register, if housing is proposed on brownfield land

To put a site forward for consideration for inclusion in these documents please complete this form. It can be completed online at (*address to be inserted*) and saved to your personal device, or printed out and completed manually. The completed form should then be returned either by email or post, with a plan clearly showing the location of the site and the site boundary.

Please email completed form and location plan to: [development.plans@blackpool.gov.uk](mailto:development.plans@blackpool.gov.uk) or send to Planning Strategy, Planning Department, PO Box 17, Corporation Street, Blackpool FY1 1LZ.

Completed forms must be returned by: (*time and date to be inserted*)

Please note:

- Sites can be submitted for consideration for any form of future development/use, or protection from development. For example: housing, employment, retail, leisure, health, community uses, open space, sites for gypsies and travellers, sites for travelling showpeople, or a mix of uses. Broad locations for development or other uses will also be considered.
- **Housing** – housing sites of any size will be considered for inclusion in the Blackpool Housing and Employment Land Availability Assessment, but only sites capable of delivering 5 dwellings and above will be considered for allocation in the Blackpool Local Plan Part 2. Please set out the type or types of housing that you consider appropriate for the site. For example, sites could be suitable for market housing, affordable housing, starter homes, housing for older people, custom or self-build housing, student housing, or for a mix of housing types. The Government intends to introduce a requirement for councils to produce a brownfield register of sites suitable for housing. Sites on brownfield land will also be considered for inclusion in this register.
- **Economic development and other uses** – employment sites of any size will be considered for inclusion in the Blackpool Housing and Employment Land Availability Assessment, but only sites of 0.25ha (or 500m<sup>2</sup> of floor space) and above will be considered for allocation in the Blackpool Local Plan Part 2.
- A separate response form must be completed for each site submitted. When completing the form please provide as much information as you are able.
- Your suggested site cannot be included if you do not provide a 1:1250 or 1:2500 location plan which clearly identifies the site and its boundaries.



- The information provided will be made publicly available. However, personal details, with the exception of your name/organisation, will not be made public.
- **Putting a site forward does not guarantee that the Council will allocate it, or support its development in the future, as all sites will need to be assessed in accordance with relevant planning policies and other considerations.**

If you have any questions, or need help filling in this form, please contact the planning strategy team at [development.plans@blackpool.gov.uk](mailto:development.plans@blackpool.gov.uk) or telephone 01253 476267.

**SECTION 1: YOUR DETAILS**

<b>SECTION 1: YOUR DETAILS</b>	
Name	
Organisation (if applicable)	
Email	
Telephone	
Your address	
Postcode	
Please state whether you are:	<input type="checkbox"/> A Landowner <input type="checkbox"/> A Developer
	<input type="checkbox"/> A Registered Social Housing Provider <input type="checkbox"/> A Planning Consultant
	<input type="checkbox"/> A Land agent <input type="checkbox"/> A Resident
	Other (please specify):
	If acting on behalf of a landowner/developer please provide their details



**SECTION 2: SITE DETAILS AND CURRENT USE**

SECTION 2: SITE DETAILS AND CURRENT USE	
Site name and address	
Postcode	
Total site area (hectares)	
Area suitable for development (if not all of the site area is suitable for development due to constraints such as woodland, buildings on site etc. please estimate how much of the site could be developed)	
Have you included a 1:1250 or 1:2500 Ordnance Survey based map that clearly shows the location and precise boundaries of the site?	
Current land use(s) and existing buildings/structures on site (please provide as much detail as possible)	
Are there any buildings or uses on site that are to be retained?	
Previous land use(s) and buildings on site (please provide as much detail as possible)	
Please provide details of any historic or current planning applications of relevance to the development of the site	



**PROPOSED DEVELOPMENT**

**SECTION 3: PROPOSED DEVELOPMENT – RESIDENTIAL**

Only complete Section 3 if residential uses are proposed (including as part of mixed use schemes). Proposals for gypsy and traveller sites, or travelling showpeople sites should be included in this section. If no residential uses are proposed please go to Section 4.

<b>SECTION 3: PROPOSED DEVELOPMENT – RESIDENTIAL</b>		
Type(s) of housing proposed (please tick all that apply)	<input type="checkbox"/> Market	<input type="checkbox"/> Affordable
	<input type="checkbox"/> Starter homes	<input type="checkbox"/> Housing for older people
	<input type="checkbox"/> Custom/self-build	<input type="checkbox"/> Student
	<input type="checkbox"/> Gypsy and traveller site	<input type="checkbox"/> Travelling showpeople site
	<input type="checkbox"/> A mix of housing types:	<input type="checkbox"/> Other (please describe)
Estimated number of dwellings or estimated number of gypsy/traveller pitches or travelling showpeople plots		
Form of housing proposed (please tick all that apply)	<input type="checkbox"/> Houses	<input type="checkbox"/> Bungalows
	<input type="checkbox"/> Flats/Apartments	<input type="checkbox"/> Gypsy and traveller pitches
	<input type="checkbox"/> Travelling showpeople plots	<input type="checkbox"/> Specialist housing for older people (please describe)
	<input type="checkbox"/> Other (please describe)	
Dwelling sizes (please tick all that apply)	<input type="checkbox"/> 1 bedroom	<input type="checkbox"/> 2 bedrooms
	<input type="checkbox"/> 3 bedrooms	<input type="checkbox"/> 4 or more bedrooms
	<input type="checkbox"/> Unknown	





**SECTION 4: PROPOSED DEVELOPMENT – OTHER USES**

Complete this section of the form if you are proposing non-residential uses. If you are not proposing any non-residential uses please go to Section 5.

SECTION 4: PROPOSED DEVELOPMENT – OTHER USES		
Type of development proposed (please tick all that apply)	<input type="checkbox"/> Employment	<input type="checkbox"/> Retail
	<input type="checkbox"/> Leisure	<input type="checkbox"/> Health
	<input type="checkbox"/> Community uses	<input type="checkbox"/> Open space
	<input type="checkbox"/> Other (please describe)	
Please provide more detail about the type of development proposed		
Estimate of the floorspace for each use proposed in square metres		

**AVAILABILITY**

**SECTION 5: SITE OWNERSHIP**

SECTION 5: SITE OWNERSHIP			
What is your/your client’s interest in the site?	<input type="checkbox"/> Sole owner of the site	<input type="checkbox"/> Part owner of the site	<input type="checkbox"/> Lessee
	<input type="checkbox"/> Option holder	<input type="checkbox"/> No ownership	<input type="checkbox"/> Other (please describe)
Names and contact details for all owners of the site (if different from Section 1)			
Have the owners of all parts of the site indicated support for your proposals for the site?			



**SECTION 6: SITE AVAILABILITY**

SECTION 6: SITE AVAILABILITY			
	No	Yes	If yes please provide details
Are there current uses/occupiers that would need to be relocated?	<input type="checkbox"/>	<input type="checkbox"/>	
Does any further land need to be acquired to develop the site?	<input type="checkbox"/>	<input type="checkbox"/>	
Are there any legal or ownership constraints, such as ransom strips or covenants on the land, which might prohibit or delay development of the site? If so, please set out how these issues could be overcome.	<input type="checkbox"/>	<input type="checkbox"/>	

**SUITABILITY**

**SECTION 7: SITE ACCESS**

SECTION 7: SITE ACCESS		
Is there safe vehicular and pedestrian access to the site for the type of development proposed?	<input type="checkbox"/> No	<input type="checkbox"/> Yes
Please set out where the site access is located, or proposed to be located. This may be an existing or proposed location, or multiple locations.		
Please set out any constraints to site access (such as topography, road capacity, physical barriers, visibility problems, land ownership issues etc.) and set out any measures required to overcome them.		
Is there public transport access to the site, or in close proximity to the site? If so, please describe and set out the main destinations served.		



**SECTION 8: SITE UTILITIES/ INFRASTRUCTURE**

Please provide information about utilities connections to the site in Section 8:

<b>SECTION 8: SITE UTILITIES/INFRASTRUCTURE</b>				
		<b>Yes</b>	<b>No</b>	<b>Don't know</b>
Does the site have access to the following utilities/infrastructure provision?	Mains water supply	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Mains sewerage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Electrical supply	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Gas supply	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Broadband	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Other (please specify):			

**SECTION 9: ENVIRONMENTAL CONSTRAINTS**

<b>SECTION 9: ENVIRONMENTAL CONSTRAINTS</b>	
<b>Is the site, or part of the site, subject to any of the following constraints?</b>	<b>Please provide further details and suggest how any constraints may be overcome</b>
Steep slopes or differences in ground levels	
National or local ecological designations	
Woodland, protected trees or other significant trees or plant habitat on site	
Streams or ponds	



<b>SECTION 9: ENVIRONMENTAL CONSTRAINTS</b>	
<b>Is the site, or part of the site, subject to any of the following constraints?</b>	<b>Please provide further details and suggest how any constraints may be overcome</b>
The presence of, or use by, protected species or other wildlife	
Public Rights of Way	
Conservation Area designation or heritage assets such as Listed Buildings or locally listed buildings. These could be on the site, adjacent to the site, or viewed from the site.	
Contamination or potential contamination from an existing, previous or neighbouring use. Please provide details of any contamination studies that have been undertaken, or remediation measures that have been undertaken.	
Flooding or surface water drainage issues. Is the site in an area of flood risk? (flood mapping can be found on the Environment Agency website)	
Neighbouring uses that could impact on the development of the site, such as pylons and power lines, busy highways, noise generating uses, industrial uses etc.	
Neighbouring uses that may be sensitive to new development	
Other environmental constraints. Please describe.	



## ACHIEVABILITY

### SECTION 10: DEVELOPMENT TIMESCALES, COSTS AND VIABILITY

SECTION 10 : DEVELOPMENT TIMESCALES, COSTS AND VIABILITY		
When do you estimate that development could start on site?	<input type="checkbox"/> Immediately (2017)	<input type="checkbox"/> Up to 5 years
	<input type="checkbox"/> 5 – 10 years	<input type="checkbox"/> 10 – 15 years
	<input type="checkbox"/> Over 15 years	
What is your reasoning for the above timescale?		
Are there any known significant abnormal development costs to deal with such as demolition, remediation, relocating existing uses etc.?		
Does the site require significant new infrastructure investment to be suitable for development?		
Are there any other issues (e.g. legal issues) that may influence the economic viability or timing of the development?		

### SECTION 11: MARKET INTEREST

SECTION 11: MARKET INTEREST				
Question	Yes	No	Don't Know	Comments
Is the site owned by a developer?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is the site under option to a developer?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Have any enquiries been received about developing the site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is the site currently being marketed for any use or uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



## OTHER INFORMATION

### SECTION 12: OTHER RELEVANT INFORMATION

Please provide any additional information that is relevant to your proposal for the site here. If necessary, please continue on a separate sheet.

SECTION 12: OTHER RELEVANT INFORMATION

<p>The information provided about sites will be made public and used to inform the Council’s emerging Local Plan Part 2 and its supporting evidence base.</p> <p>If you wish to be consulted on the Blackpool Local Plan in the future please tick this box <input type="checkbox"/></p>			
<b>Signature</b>		<b>Date</b>	

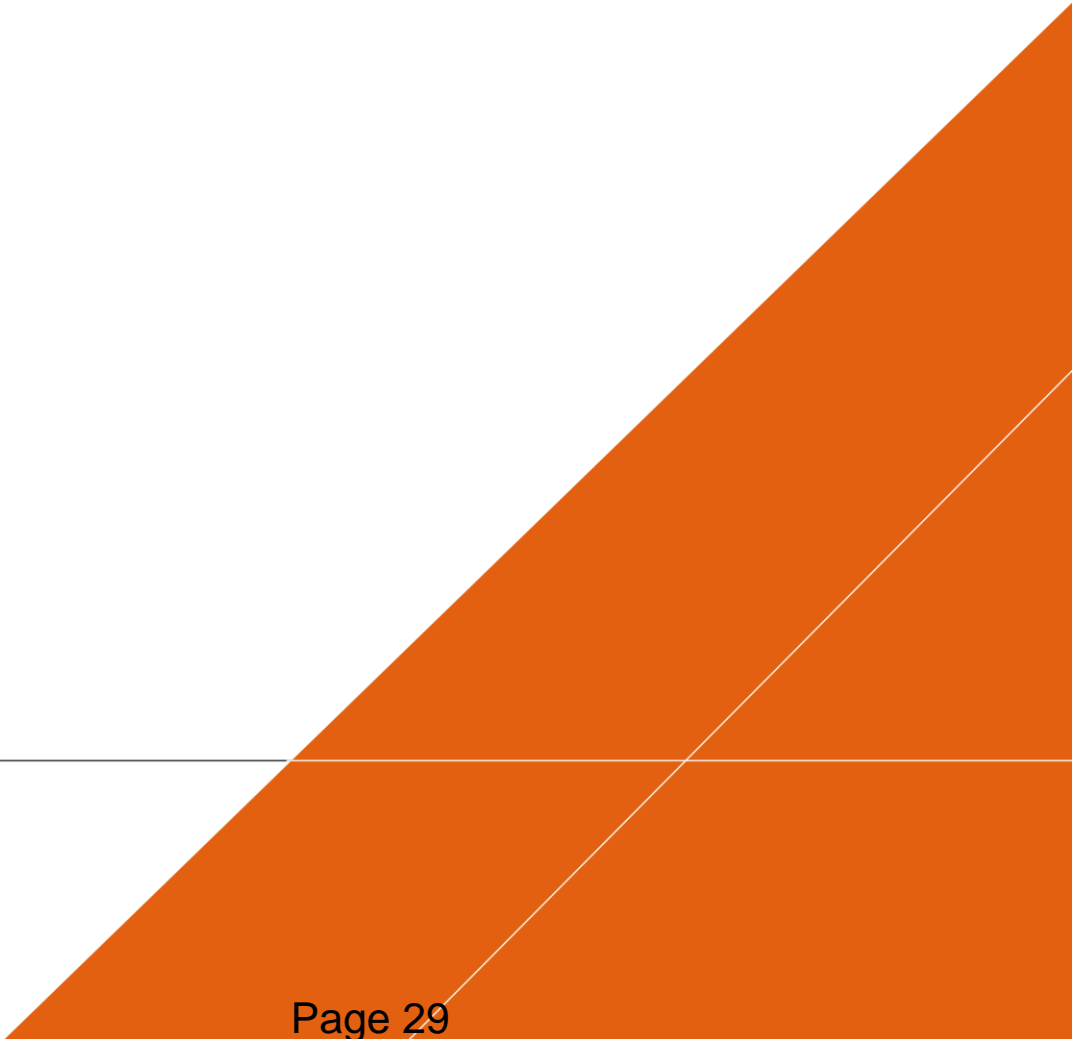




# SUSTAINABILITY APPRAISAL OF PART 2 OF THE LOCAL PLAN

## Scoping Report

JANUARY 2017



Incorporating

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Arcadis.  
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## VERSION CONTROL

Version	Date	Author	Changes
013-NH51129- EEA-01-F	04/11/2016	ELW	First Issue
013-NH51129- EEA-02-F	21/12/2016	ELW	Final draft following client comments
013-NH51129- EEA-03-F	03/01/2017	ELW	Final for Consultation
	March 2017	HDP	FINAL

This report dated 03 January 2017 has been prepared for Blackpool Borough Council (the "Client") in accordance with the terms and conditions of appointment dated 04 November 2016(the "Appointment") between the Client and **Arcadis** for the purposes specified in the Appointment. For avoidance of doubt, no other person(s) may use or rely upon this report or its contents, and Arcadis accepts no responsibility for any such use or reliance thereon by any other third party.

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## ABBREVIATIONS

AMR	Annual Monitoring Report
ANGSt	Accessible Natural Green Space Standards
AQMA	Air Quality Management Area
AONB	Areas of Outstanding Natural Beauty
BAP	Biodiversity Action Plan
CO <sub>2</sub>	Carbon Dioxide
cSAC	Candidate Special Area of Conservation
DCLG	Department of Communities and Local Government
Defra	Department for the Environment, Food and rural Affairs
DPD	Development Plan Document
EA	Environment Agency
ESDP	European Spatial Development Perspective
FRA	Flood Risk Assessment
GCSE	General Certificate of Secondary Education
GIS	Geographical Information Systems
GP	General Practitioner
GVA	Gross Value Added
HRA	Habitats Regulations Assessment
ICT	Information and Communication Technology
IMD	Indices of Multiple Deprivation
JUVOS	The Joint Unemployment and Vacancies Operating System Cohort
LCC	Lancashire County Council
LDS	Local Development Scheme
LEP	Lancashire Enterprise Partnership
LNR	Local Nature Reserve
LSOA	Lower Super Output Area
NO <sub>2</sub>	Nitrogen Dioxide
NNR	National Nature Reserve
NVQ	National Vocational Qualification
ODPM	Office of the Deputy Prime Minister
ONS	Office for National Statistics

OS	Ordnance Survey
PAYE	Pay As You Earn
PPG	Planning Practice Guidance
pSPA	Potential Special Protection Area
RIGS	Regionally Important Geological/Geomorphological Site
RSPB	Royal Society for the Protection of Birds
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SMR	Standardised Mortality Ratio
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
VAT	Value Added Tax
VOCs	Volatile Organic Compounds

# 1 Introduction

## 1.1 Background and Purpose to the Scoping Report

This Scoping Report has been prepared by Arcadis UK Ltd. on behalf of Blackpool Council as part of the combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) (hereafter referred to as SA) of the emerging Local Plan. The new Local Plan will guide planning matters in Blackpool. It will eventually replace the current Blackpool Local Plan 2001-2016 (which was adopted in June 2006).

The new Local Plan will primarily be made up of:

- Local Plan Part 1: Core Strategy (adopted 20<sup>th</sup> January 2016); and
- Local Plan Part 2: Site Allocations and Development Management Policies document

Policies in the Core Strategy replace many of the policies of the Blackpool Local Plan 2001-2016. Some policies of the Local Plan 2001-2016 continue to be 'saved' Local Plan Policies until such time as they are replaced. The Core Strategy sets out where new development (including housing, employment, retail and leisure) should be located to meet Blackpool's future needs to 2027. It also identifies areas which will be regenerated, protected or enhanced and sets out the key development principles such as design and affordable housing.

In order to support the delivery of the Core Strategy, the Site Allocations and Development Management Policies Document shall set out site allocations, designations and development management policies. This is described further in Section **Error! Reference source not found.**

SA has been conducted on the adopted Core Strategy, based upon previous SA scoping work. This SA Scoping Report represents an update to this initial stage in the SA process for the emerging Local Plan Part 2 and its purpose is to:

- Revise and set the scope and level of detail of the SA for the Site Allocations and Development Management;
- Identify relevant plans, policies, programmes and initiatives that will inform the SA process and the Local Plan Part 2;
- Identify relevant baseline information;
- Identify key sustainability issues and problems; and
- Present an SA Framework, consisting of sustainability objectives and sub-objectives, against which the Local Plan Part 2 can be assessed.

## 1.2 Blackpool Council Context and Location

Blackpool lies within the Fylde Coast sub-region, along with Fylde and Wyre (two-tier areas covered by Lancashire County Council and the Councils of Fylde and Wyre). In figure 1 below, Blackpool is highlighted in orange. Located on the northern/eastern edge and eastern/southern edge of the Borough boundary respectively, Wyre and Fylde are predominantly rural areas (Figure 1). The sub-region demonstrates a high level of self-containment in terms of housing markets, travel to work patterns and economic functionality; and the Fylde Coast authorities have been working together on strategic planning issues for many years. It has been important to address cross-boundary issues in a collaborative way, to ensure Blackpool's Local Plan Part 2 aligns with the policy framework of neighbouring authorities, and co-operate with them on strategic planning issues.

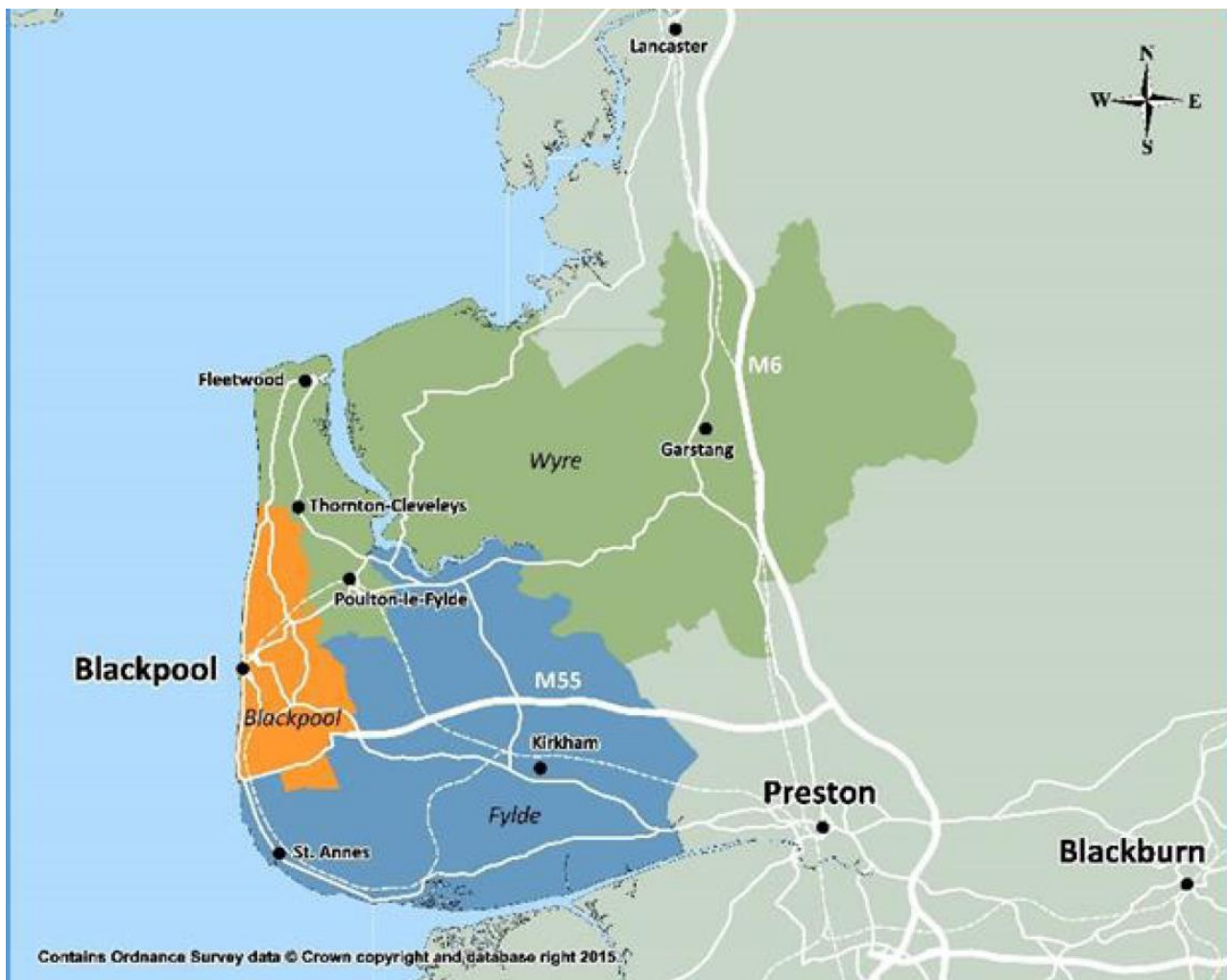


Figure 1 Location of Blackpool Borough within the sub-region

Beyond the sub-region, Blackpool and the Fylde Coast area is part of the Lancashire Enterprise Partnership (LEP). The LEP was established in April 2011, to provide strategic leadership for directing economic growth and priorities across Lancashire. Blackpool Council works with the LEP as part of the Duty to Co-operate. This has included the preparation of the Lancashire Growth Plan and the Lancashire Strategic Economic Plan, which sets out the growth ambitions for Lancashire as a whole for the next 10 years. The three Fylde Coast authorities, along with the Blackpool, Fylde and Wyre Economic Development Company, are also developing a complementary local Growth Accelerator Strategy focused on delivering economic change in the Fylde Coast area.

Blackpool covers an area of around 35km<sup>2</sup>, with 11.2km (7 miles) of seafront. It is England’s largest and most popular seaside resort attracting more than 10 million visitors a year. It is also the main retail, public administration, cultural and service centre for the Fylde Coast, supporting an estimated population of 141,967. 62,000 members of the population are considered to be economically active.

Blackpool is intensely urban and compact in form, characterised at its heart by the Resort Core, an area of some 5 km<sup>2</sup> and the adjoining Town Centre. Elsewhere, Blackpool is predominantly residential in character, largely built up to its boundaries, with the few remaining areas of open land located in the south and east of the town.

For a coastal town, Blackpool has good strategic transport links. This includes good connections to the national road and rail networks, as well as Blackpool Airport which is located on Blackpool’s southern boundary in Fylde.

The town is built on tourism, where British holiday makers from all classes of society flocked to the resort for pleasure, fun and entertainment. It grew rapidly at the turn of the 20<sup>th</sup> century after the arrival of the railway line with a period of phenomenal development leaving a legacy of high-quality late Victorian architecture,

including the iconic Blackpool Tower, piers and promenade. Successive decades saw the introduction of the Winter Gardens, Pleasure Beach and Golden Mile, along with dense holiday guest houses and small hotels in a grid-iron pattern of terraced streets behind the seafront.

In its heyday, Blackpool attracted around 17 million visitors each year, supported more than 100,000 holiday bed spaces and was the largest holiday destination in the UK. Whilst Blackpool remains at the heart of the UK tourism and visitor economy, it has experienced a significant decline in visitor numbers from the 1980s onwards; a consequence of growing affluence, enhanced consumer choice and the perceived obsolescence of the town's visitor offer. Three decades of resort decline has led to an underperforming economy and high levels of deprivation.

## 2 Sustainability Appraisal and Strategic Environmental Assessment

SA is a process for assessing the social, economic and environmental impacts of a plan and aims to ensure that sustainable development is at the heart of the plan-making process. It is a legal requirement that the Local Plan Part 2 is subject to SA, under the Planning and Compulsory Purchase Act 2004. This Act stipulates that the SA must comply with the requirements of the SEA Regulations<sup>1</sup>, which transpose the requirements of the SEA Directive<sup>2</sup> into UK law.

SEA is a systemic process for evaluating the environmental consequences of plans and programmes to ensure that environmental issues are integrated and assessed at the earliest opportunity in the decision-making process. Article 1 of the SEA Directive states that the aim is to:

*'provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development'.*

It is possible to combine the processes of SEA and SA, as they share a number of similarities. Guidance<sup>3</sup> published by the Department for Communities and Local Government (DCLG) promotes a combined process (i.e. a process which assesses social, economic and environmental effects) and this is the approach that has been adopted here. Whilst there are formalised approaches for both SA and SEA, only SEA has a legal obligation to perform certain activities. These legal obligations have been and will continue to be adhered to throughout the combined SA and SEA for the new Local Plan Part 2. This Scoping Report includes a series of boxes which clearly identify the specific requirements of the SEA Directive that need to be fulfilled.

### 2.1 Consultation

In accordance with Regulation 12(5) of the SEA Regulations, this updated Scoping Report has been consulted upon for a five-week period (9<sup>th</sup> Jan – 13<sup>th</sup> Feb 2017) with the statutory SEA bodies, which are:

- The Environment Agency (EA);
- Natural England; and
- Historic England.

Comments received have been taken forward to inform the SA process.

### 2.2 Habitats Regulations Assessment

European Council Directive 92/43/EEC on the Conservation of natural habitats and of wild flora and fauna (the 'Habitats Directive') requires that any plan or programme likely to have a significant impact upon a Natura 2000 site (Special Area of Conservation (SAC), candidate Special Areas of Conservation (cSAC), Special Protection Area (SPA), potential Special Protection Area (pSPA) and Ramsar site), which is not directly concerned with the management of the site for nature conservation, must be subject to an Appropriate Assessment. The overarching process is referred to as Habitats Regulations Assessment (HRA).

A HRA screening exercise will be undertaken to determine if the Local Plan Part 2 (either in isolation and/or in combination with other plans or projects) would generate an adverse impact upon the integrity of a Natura 2000 site, in terms of its conservation objectives and qualifying interests. This process will be documented in a Screening Report that will be submitted to Natural England for approval.

---

<sup>1</sup> S.I. 2004 No. 1633: The Environmental Assessment of Plans and Programmes Regulations, 2004

<sup>2</sup> Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, June 2001

<sup>3</sup> DCLG (2014). *Planning Practice Guidance: Strategic environmental assessment and sustainability appraisal*. <http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/strategic-environmental-assessment-and-sustainability-appraisal-and-how-does-it-relate-to-strategic-environmental-assessment/>

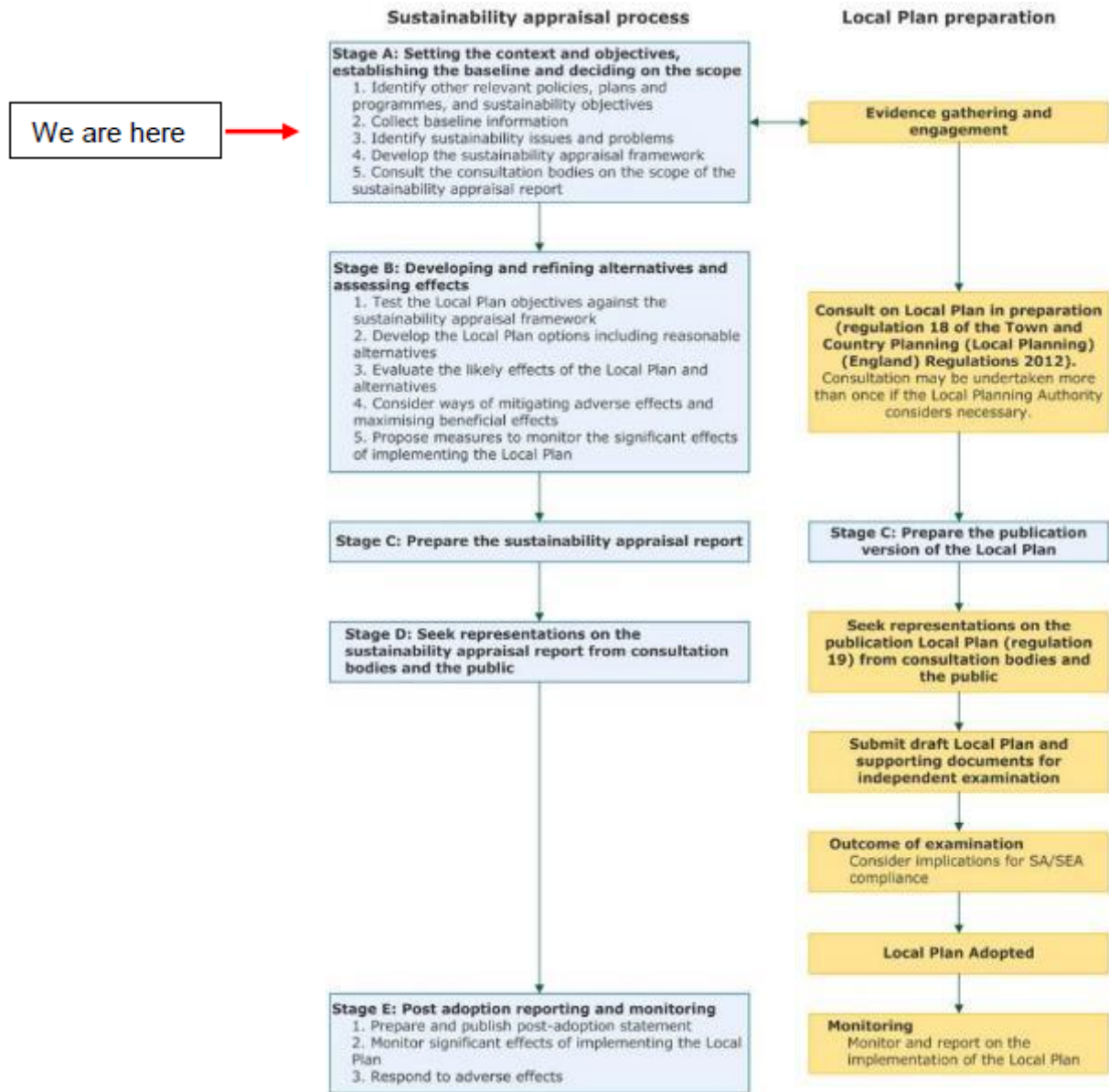


### 3 The SA Process

#### 3.1 Stages in the SA Process

The Planning Practice Guidance (PPG) subdivides the SA process into a series of stages. While each stage consists of specific tasks, the intention should be that the process is iterative. Figure 2 presents the key stages in the SA process as they correspond with the stages of the plan-making process.

Figure 2: Stages in the SA Process



The SA Scoping stage (this stage) corresponds with Stage A of Figure 2. The table also demonstrates how each of the stages of SA are linked to the preparation and development of the Local Plan Part 2 and where that information can be found in this report.

Following the Scoping Consultation, the SA will move to Stage B which will involve the appraisal of the alternative and preferred options. This will be reported in the formal SA Report which will be consulted upon alongside the Publication version of the Local Plan Part 2 document.

## 4 The Local Plan

### 4.1 Background

The Blackpool Local Plan to 2027 sets out the long-term vision for the whole of Blackpool. It will form the main consideration when deciding planning applications. It is a package of strategic planning documents, including one which will allocate sites for new development, in turn including housing, employment and retail. It aims to also identify areas for safeguarding and protection such as public open space and Greenbelt. The Local Plan is in two parts.

- Local Plan Part 1: Core Strategy (adopted 2016). This is a key planning document which sets out the broad areas where new development such as housing, employment, retail and leisure should be located to meet Blackpool's future needs to 2027. It also identifies which areas within Blackpool will be regenerated, protected or enhanced and sets out key development principles, for example design and affordable housing.
- The Local Plan Part 2 will more specifically designate areas where particular policies will apply, for example in local centres and will allocate specific parcels of land for development. Finally, the Local Plan Part 2 will include policies to be applied when considering applications for development in topics including design, amenity and transport.

The Local Plan is supported by a number of planning documents:

- Leisure Quarter Development Brief (adopted 2011),
- Holiday Accommodation SPD(adopted 2011),
- New Homes from Old Places SPD (adopted 2011),
- Extending Your Home SPD (adopted 2007),
- Talbot and Brunswick Neighbourhood Planning Guidance (adopted 2006),
- Talbot Gateway Planning Brief (adopted 2006),
- Affordable Housing SPD (to be prepared),
- Green Infrastructure Strategy (to be prepared)

### 4.2 Vision and Objectives

The Local Plan has the following Vision:

In 2027 Blackpool has built upon its status as Britain's favourite seaside resort to become renowned for the quality and innovation of its culture, entertainment and business tourism offer. Blackpool is the principal centre for business, culture and education on the Fylde Coast with the town centre firmly established as the sub-regional centre for retail.

The resort offers a high quality visitor experience attracting new audiences and creating new reasons to visit Blackpool year-round. The Promenade is revitalised, with quality development providing excellent attractions and accommodation, and public realm enhancements supporting an exciting cultural programme of events and festivals. Blackpool Town Centre is thriving at the heart of the resort core and provides an important sub-regional retail, cultural and business centre for Fylde Coast residents. The town centre offers a high quality shopping, leisure and entertainment experience throughout the day and into the evening centred on key assets including the Tower and Winter Gardens. Attractive streets and spaces host events and activities and provide strong links to the beach.

As the main economic centre of the Fylde Coast, Blackpool has a diverse and prosperous economy with a thriving culture of enterprise and entrepreneurship. It retains a strong educational offer supporting a skilled and educated workforce encouraging aspiration and ambition. A sustainable integrated transport system supports a competitive Fylde Coast economy with safe and convenient access to jobs and services, and provides visitors with a positive resort experience.

Blackpool has created a more equal society with sustainable communities having fair access to quality jobs, housing, shopping, health, education, open space, sport and recreation. The housing stock has significantly improved with a range of new, high quality homes in attractive neighbourhoods attracting new residents who aspire to live by the sea. South Blackpool makes an important contribution to rebalancing the housing market and growing the Fylde Coast economy by providing improved choice in quality homes and jobs in sustainable locations to meet community needs and support regeneration.

To complement the quality of the urban environment, Blackpool's natural environment consists of an accessible network of quality green open spaces, coast and countryside, which have been protected and enhanced for people to enjoy and to sustain a rich biodiversity. Promoting sustainable development has been integral to transforming Blackpool and addressing climate change issues. A strong sense of civic pride pervades the town.

The Local Plan has the following objectives:

**GOAL 1: Sustainable regeneration, diversification and growth**

**Our key objectives are to:**

1. Ensure a balanced approach to regeneration and growth with sustainable development which meets the needs of Blackpool's people now and into the future
2. Support new housing provision to deliver a choice of quality homes across the Borough for new and existing residents
3. Strengthen the local economy through sustainable investment in new enterprise, entrepreneurship and business start-ups, creating better paid jobs and a wider choice of employment
4. Enable easier and sustainable journeys within Blackpool and the Fylde Coast by integrating transport systems and promoting sustainable modes of travel
5. Create well-designed places for people to enjoy with high quality buildings, streets and spaces, whilst conserving and enhancing Blackpool's rich heritage and natural environment
6. Address climate change issues by managing flood risk, protecting water quality, reducing energy use and encouraging renewable energy sources
7. Ensure there is sufficient and appropriate infrastructure to meet future needs

**GOAL 2: Strengthen community wellbeing to create sustainable communities and reduce inequalities in Blackpool's most deprived areas**

**Our key objectives are to:**

8. Develop sustainable and safer neighbourhoods that are socially cohesive and well connected to jobs, shops, local community services including health and education, culture and leisure facilities
9. Achieve housing densities that respect the local surroundings whilst making efficient use of land, ensure new homes are of a high quality design, and require a mix of house types, sizes and tenures suitable to the location to re-balance the housing market
10. Meet residents' needs for affordable housing to provide people with a choice of homes they can afford in places they want to live
11. Improve the health and well-being of Blackpool's residents and reduce health inequalities by maintaining good access to health care and encouraging healthy active lifestyles, including access to open spaces, the coast, countryside, sport and recreation facilities
12. Increase access to quality education facilities to improve educational achievement, skills and aspirations
13. Guide the provision of traveller sites in appropriate locations where there is an identified need

**GOAL 3: Regeneration of the town centre, resort core and inner areas to address economic, social and physical decline**

**Our key objectives are to:**

14. Sustain a high quality, year-round visitor offer by growing and promoting our tourism, arts, heritage and cultural offer including new high quality attractions, accommodation and conferencing facilities and an exciting programme of national events and festivals
15. Secure investment in retail, leisure and other town centre uses in Blackpool Town Centre to strengthen the offer with high quality shopping, restaurants, leisure, entertainment and offices, making the town centre the first choice shopping destination for Fylde Coast residents and an attractive place to visit and do business
16. Establish balanced and stable communities in the inner areas with sustainable housing regeneration and new landmark residential development which improves housing quality and choice

**GOAL 4: Supporting growth and enhancement in South Blackpool to meet future housing and employment needs for Blackpool and the Fylde Coast**

**Our key objectives are to:**

17. Support economic growth along the Blackpool Airport Corridor and on lands close to Junction 4 of the M55
18. Link the delivery of new housing development in South Blackpool with resort regeneration, for example through New Homes Bonus and commuted sum payments, to create more sustainable housing markets
19. Provide a complementary housing offer between new homes in South Blackpool and those delivered through regeneration in the inner areas to avoid competition within Blackpool's housing market
20. Balance the requirement for new development in South Blackpool whilst recognising the distinctive character of remaining lands on Marton Moss
21. Secure the necessary infrastructure to enable new sustainable development which integrates with its surroundings, providing choice and convenient access to employment, services and community facilities

### 4.3 What Does the Local Plan Part 2 Cover?

The Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Development Plan Document, in which this scoping report applies, sets out to:

- Allocate sites for new development including housing, employment and retail and identify areas for safeguarding and protection e.g. public open space, greenbelt
- Designate areas where particular policies will apply e.g. local centres
- Include policies to be applied when considering applications for development e.g. design, amenity and transport.

The Part 2 policies are anticipated to be structured under the following headings:

- Housing
- Economy
- Design and Amenity
- Historic and Built Environment
- Environment
- Community
- Transport

## 5 Review of Relevant Plans, Programmes and Environmental Objectives

### 5.1 Introduction

The box below stipulates the SEA Regulations requirements for this stage of the process.

*Box 1: SEA Regulations Requirements for the Review of Plans Programmes and Environmental Protection Objectives*

*'...an outline of the contents and main objectives of the plan or programme and relationship with other relevant plans and programmers' (Schedule 2-1).*

*'the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation' (Schedule 2-5)*

A review of other plans and programmes that may affect the preparation of the Local Plan Part 2 was undertaken in order to contribute to the development of both the SA and the Plan. This included:

- Identification of any external social, environmental or economic objectives, indicators or targets that should be reflected in the SA process.
- Identification of any baseline data relevant to the SA.
- Identification of any external factors that might influence the preparation of the document, for example sustainability issues.
- Identification of any external objectives or aims that would contribute positively to the development of the Local Plan Part 2.
- Determining whether there are clear potential conflicts or challenges between other identified plans, programmes or sustainability objectives and the emerging Local Plan Part 2.

### 5.2 Key Results from the Review

The review included documents prepared at international, national, regional (sub-regional) and local scale. A brief summary of the documents reviewed and the main findings are summarised in Table 4-. Further details presented in Appendix A.

*Table 4-1: Summary of main findings of the Plans and Policy Review*

Level	Summary
International Plans and Programmes	A review was undertaken of key International Conventions and European Directives that could potentially influence the development of the Local Plan Part 2 and the SA. European Directives are transposed into national legislation in each individual Member State and, therefore, there should be a trickle-down effect of the key principles and an application to the relevant national, regional and local circumstances in other planning documents.
National Plans and Programmes	Central Government establishes their guidelines and policies for a variety of different topics within the National Planning Policy Framework (NPPF) and PPG. The Framework and the PPG set out planning policies for England and how they are expected to be applied. It provides guidance for Local Plan Part 2 authorities and decision-takers, both in drawing up plans and making decisions about planning applications. The Framework was reviewed to ensure that the SA process aligned with its aims and objectives. A review was also undertaken of relevant White Papers, plans and strategies including the Sustainable Development Strategy which outlines the over-arching Government objective to raise the quality of life in our communities.

Level	Summary
Regional and County Level Plans	Where appropriate, county and sub-regional level plans have been considered. The objectives of these plans as well as some of the challenges they raise need to be taken on board as appropriate. However, it must be noted that the overarching goals of these plans and strategies may be outside the remit of the Local Plan Part 2 which forms only individual parts of a number of different vehicles trying to deliver the county level targets.
Local Policy	Plans produced at the local level specifically address issues relating to the economy; health; safety; sustainable communities; housing and employment. The Local Plan Part 2 and the SA should draw from these documents and transpose their aims in their policies and proposals where appropriate. These plans, should in theory, have included the main influences of international, national, regional and county level plans through the 'trickle-down effect'. They should also provide more of a local focus for the Borough. It is, through identifying these themes and incorporating them into the Local Plan Part 2 that synergies can be achieved with other relevant documents. Notable plans include the Blackpool Council Plan and the Blackpool Local Plan Part 1: Core Strategy.

## 6 Baseline Information and Identification of Key Sustainability Issues

### 6.1 Introduction

The box below stipulates the SEA Regulations requirements for this stage of the process.

*Box 3: SEA Regulation Requirements for baseline and the identification of key sustainability issues*

The SEA Regulations require that the SEA covers:

*'relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme' and, 'the environmental characteristics of the areas likely to be significantly affected' (Schedule 2-2 and 2-3)*

*'any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds(a) and the Habitats Directive' (Schedule 2-4)*

Characterising the environmental and sustainability baseline, issues and context is an important activity in defining the framework for the SA. It involves the following elements:

- Characterising the current state of the environment of the Borough including social and economic aspects; and
- Using this information to identify existing problems and opportunities which could be considered in the Local Plan Part 2.

### 6.2 Methodology

The environmental, social and economic baseline was characterised through the following methods:

- Review of relevant local, regional and national plans, strategies and programmes;
- Data research based around a series of baseline indicators developed from the Office of the Deputy Prime Minister (ODPM) guidance, previous consultation recommendations from similar SAs and the data available for the Borough; and
- Initial responses from the statutory consultees.

This also enabled the identification of sustainability issues and opportunities that affect Blackpool.

A brief overview of the baseline trends is presented below, along with an identification of the key sustainability issues and opportunities relevant to each baseline category. In accordance with best practice guidance, gaps in or uncertainties with the available data have been noted.

The baseline indicators and summaries below have been divided into baseline topics for ease of presentation, and there are many overlaps between the baseline indicators and topics. Each of the baseline topics identified in the SEA Regulation have been represented in some form. Note that some baseline indicators are contextual indicators and do not necessarily mean that they must form part of the SA Framework identified in Section 6. The SEA Regulations also require, 'material assets' to be considered within the SA/SEA. Material assets refer to the stock of valuable assets within a study area and can include many things from valuable landscapes, natural and cultural heritage through to housing stock, schools, hospitals and quality agricultural land. It is considered that material assets of the Borough are appropriately covered in the following baseline sections, and consequently will not be repeated in its own designated topic:

- Biodiversity, flora and fauna;
- Soil and land quality;
- Cultural heritage;
- Landscape;
- Housing; and,
- Transportation.

## 6.3 Environmental and Sustainability Baseline

### Population

The following indicators were used to identify key population trends and characteristics:

- Population change (ONS, 2015);
- Age structure/change (Census 2011; ONS, 2015; Lancashire.gov);
- Population distribution (ONS, 2015); and,
- Percentage ethnic groups (ONS, 2015).

The population mid-year estimate for Blackpool by ONS was 139,600 in 2015 and this has decreased by 2.3% since 2005, less than national and regional averages. This decrease in population is to be expected in a coastal authority, there is a bias towards a higher percentage of people of retirement age. Blackpool has a slightly higher proportion of under 16 year olds and over 65 year olds than the regional average, with 38.6% of the population being over 65 or under 16 (2015). There is a smaller proportion of people in the 15-64 age group and particularly the 25-44 age group. This has implications for health care, employment and provision of services in that they should be appropriate for the needs of the very young and elderly.

Population density is much higher than the rest of Lancashire, at 40.7 persons per hectare which is significantly higher than the Lancashire population density of 4 persons per hectare. This is mainly due to the predominantly urban nature of the entire Borough (ONS, 2015).

Blackpool has a relatively low proportion of ethnic groups (0.2% Black Minority Ethnic) in comparison with regional and national averages.

### Data Gaps and Uncertainties

There are no significant data gaps or uncertainties.

### Key Issues and Opportunities

High resident population with largest proportions in upper and lower age groups. This has implications for education, employment and economy, disposable income, health and other services provision.

Since 1981, there has been a large increase in the number of very elderly residents. The proportion of the working age population is projected to reduce, whereas the proportion of retirement age population is projected to increase.

### Education and Qualifications

The following indicators were used to identify levels of education and attainment in the Borough:

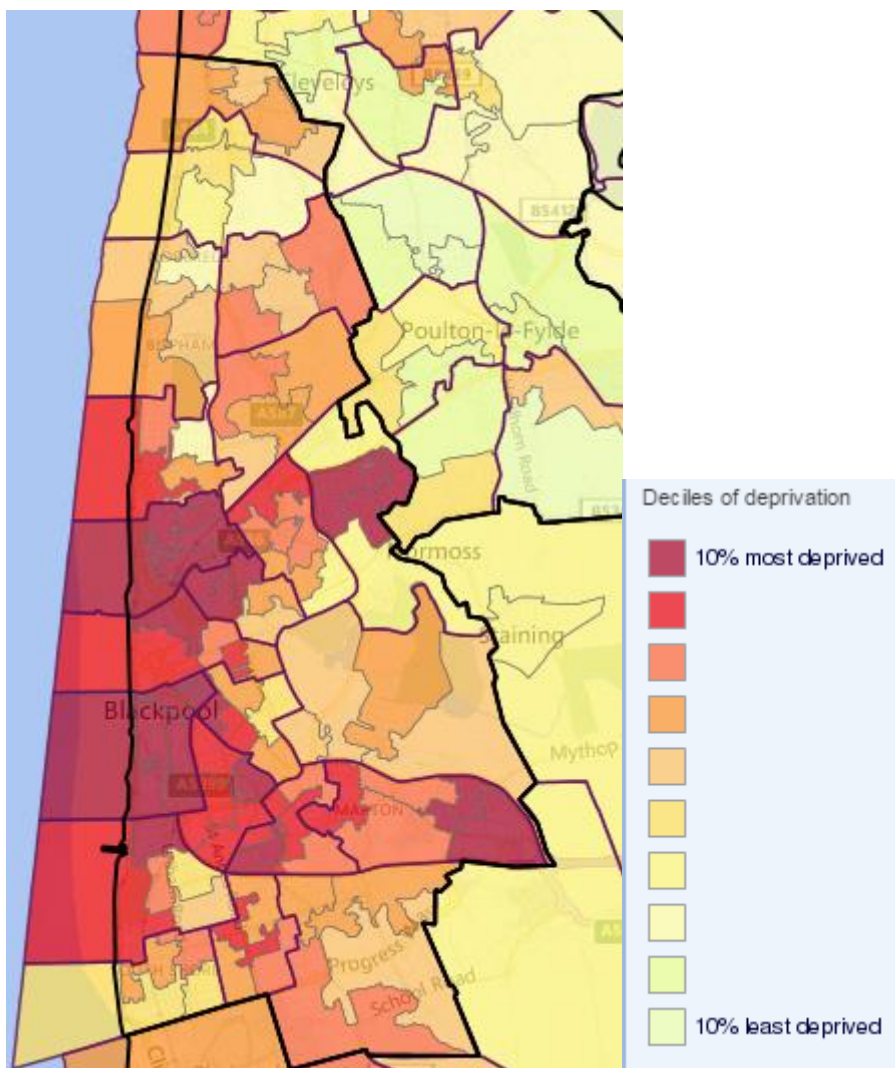
- Percentage resident population with no qualifications (ONS, 2015);
- Percentage adults (16-74) with NVQ level 4/5 compared to averages (ONS, 2015);
- Percentage of 15 year old pupils in local authority schools achieving 5 or more GCSEs at Grades A\* - C or equivalent (Lancashire.gov); and,
- Number of wards in the bottom 10% for education, skills and training deprivation (Indices of Multiple Deprivation (IMD)).

Levels of educational attainment are directly linked to levels of affluence as qualifications determine the type of employment of an individual which influences income and overall quality of life. Educational attainment is below the national and regional averages in Blackpool. The Borough has 36 Lower Layer Super Output Areas (LSOA) in the bottom 20% most deprived nationally in terms of education, skills and training. 23 of these fall within the bottom 10% and are in the wards of Hawes Side, Clifton, Bloomfield, Claremont, Brunswick, Tyldesley and Park. The Education, Skills & Training Deprivation Domain measures the lack of attainment among children and young people and secondly the lack of attainment of skills in the resident working age adult population.



The indicators for educational attainment indicate that for 15 year olds educational attainment at GCSE level is well below performance nationally. Overall within the Borough educational attainment is also below performance in the North West and nationally. Low attainment levels in children in Blackpool can potentially related to having a large transient population, which can result in problems with children settling into an educational establishment and courses. In 2014/ 2015, the percentage of pupils achieving five or more A\*-C grades at GCSE or equivalent was 42.4% in Blackpool. This was lower than all the 14 local authorities in the broader Lancashire area and results experienced an increase in comparison to 2013/14. In 2016 10.4% of the population aged 16-74 had no qualifications, compared to 9.8% in the North West and 8.6% in Great Britain. Similarly, only 21.9% of the population of Blackpool were achieving NVQ level 4 in 2015 (ONS, 2015). Participation and attainment in adult education is a particular issue in Blackpool and relates to the reportedly low levels of aspiration amongst residents of certain wards (an issue identified in the officers workshop in December 2005). This has major implications for employment and the Borough’s economy.

Figure 5.1: Blackpool – Education, Skills and Training Deprivation Domain for Blackpool SOAs by Ranking Position in England– ODPM English Indices of Deprivation 2015. (<http://dclgapps.communities.gov.uk/imd/idmap.html>)



### Data Gaps and Uncertainties

There are no significant data gaps or uncertainties.

## Key Issues and Opportunities

Low levels of educational participation and attainment in children and adults, with a particularly high proportion of adults with no qualifications.

Raising educational attainment should be a priority as it remains a driver for personal and professional development as well as overall community improvement.

Education and skills deprivation is high, with seven wards in the bottom 10% nationally.

## Human Health

The following human health indicators were used to ascertain baseline conditions and key trends:

- Percentage resident population in good health compared with national/regional averages (ONS, 2011);
- Life expectancy for males/females (ONS, 2015);
- Standard mortality rates compared to national/regional averages (ONS, 2003);
- Percentage of working-age population with a long-term limiting illness (ONS, 2015);
- Standard mortality rates for the main causes of death – coronary heart disease, cancer, alcohol, compared with national/regional averages (ONS, 2015);
- Number of wards in the bottom 10% for health deprivation and disability (IMD);
- Percentage of patients to be offered a routine appointment to see a General Practitioner (GP) within 2 working days;
- Rate of teenage pregnancy per 1,000 women aged 15 – 17 (AMR 2015); and,
- Percentage of population participating in sports and exercise (at least one occasion of at least moderate intensity activity per week for at least 30 minutes) (Active People Survey, 2015).

Health in Blackpool is relatively poor compared to national and regional averages. The Census 2011 indicated that 73.6% of the Blackpool population consider themselves to be in good health, compared to 79.3% in the North West and 81.4% in England. This subjective data indicates that the health of the Blackpool population is much worse than regional levels and national levels and is supported by the life expectancy and the Standardised Mortality Ratio (SMR) statistics. The SMR in Blackpool was 119 in 2003 compared to North West average of 110 (a figure of over 100 indicates a death rate higher than the national average) (ONS 2005).

There are 55 LSOAs distributed amongst all wards in Blackpool that are in the bottom 10% for the health deprivation and disability domain. The health deprivation & disability domain identifies areas with relatively high rates of people who die prematurely or whose quality of life is impaired by poor health, or who are disabled, across the whole population.

Data from the ODPM Neighbourhood Renewal Unit indicates that cancer and circulatory diseases in Blackpool are significantly higher than the county, regional and national averages (2006). The Blackpool Health profile shows that 234 people died from cancer under the age of 75 in 2015 and 160 people under 75 died from cardiovascular related diseases (Blackpool Health Profile). Rates are decreasing year on year for all areas. Levels of teenage pregnancy are also much higher than the national average (41.7 per 1000) although this has decreased since 2011/12 (AMR 2015). Research indicates that teenage pregnancy rates are higher in the most economically disadvantaged communities and amongst the most vulnerable young people. This is also reported to be as a consequence of very low aspirations amongst young people in Blackpool and has implications for health care, economic activity and educational attainment.

25.6% of the population (2011) in Blackpool has a long-term limiting illness which is above the North West and England and Wales figures respectively and has risen in recent years. This is likely to have economic implications for the Borough.

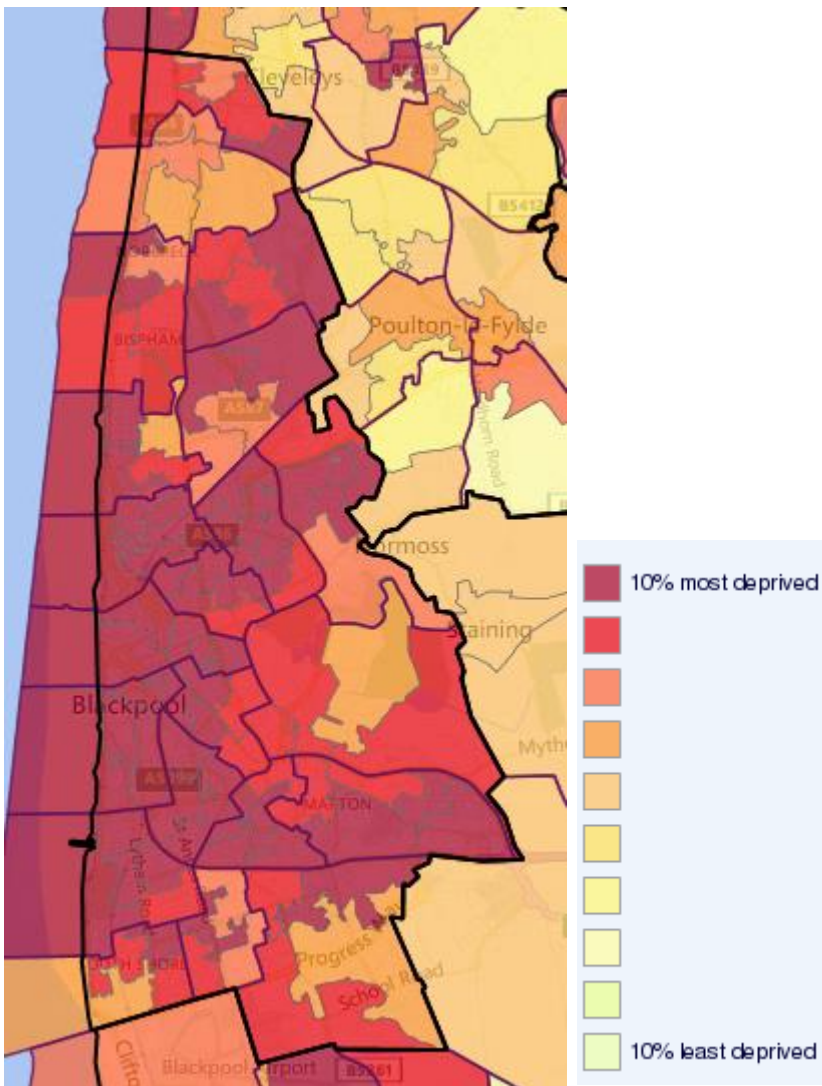
Life expectancy in 2015 was 74 for males and 80 for females (AMR 2015).

From mid-January 2014 to mid-January 2015, 28.2% of the population in Blackpool were classed as inactive by Sport England's activity survey. This value is 3.9% lower than two years ago, indicating that the level of

active people has increased. In Lancashire, 25.2% of people from mid-January 2014 to mid-January 2015 were considered inactive.

Figure 5.2: Blackpool – Health Deprivation and Disability

Domain for Blackpool SOAs by Ranking Position in England– ODPM English Indices of Deprivation 2015. (<http://dclgapps.communities.gov.uk/imd/idmap.html>)



### Data Gaps and Uncertainties

- Some discrepancies in data between sources
- A more recent figure for the SMR in Blackpool.

## Key Issues and Opportunities

Health and life expectancy in Blackpool is poor compared to national and regional averages and shows little sign of improvement. All wards have many SOAs in the bottom 10% most deprived nationally

Alcohol and smoking-related illness is a particular concern.

High percentage of population with long-term limiting illness has potential impacts on the labour force and consequently Blackpool's economy.

Levels of teenage pregnancy are high and are linked to large numbers of economically disadvantaged and vulnerable people and low aspirations.

## Water

The following indicators were used to ascertain baseline water environment conditions and key trends:

- Percentage of rivers with good/fair chemical and biological water quality (Lancashire.gov);
- Distribution of poor chemical and biological water quality (Lancashire.gov); and,
- Percentage designated bathing waters achieving compliance with EC bathing water directive.

Blackpool is a coastal town, with the seafront being the primary reason for its development as a tourist resort. Bathing water quality is measured at four points along the Blackpool sea front (Bispham, Blackpool Central, Blackpool North and Blackpool South). Blackpool South achieved the 'excellent' standard, Blackpool North was classified as 'good' whilst Bispham and Blackpool central were given the 'sufficient' rating. The 2016 Blue Flag award results rated Blackpool South as the only beach in the North West that was able to attain this international standard (Lancashire CC – Local Authority Profiles 2016). The Fylde Peninsula Water Management Partnership was established in 2011 and comprises the Environment Agency, United Utilities, Blackpool Council, Wyre and Fylde Borough Councils, Lancashire County Council and Keep Britain Tidy.

The partnership aims to:

- Improve coastal protection.
- Improve the quality of our bathing waters and beaches.
- Reduce the risk of surface water flooding.

## Data Gaps and Uncertainties

- Additional information about sources of drinking water and groundwater quality.
- Up-to-date water quality data;

## Key Issues and Opportunities

High standards of bathing water quality should be maintained and where possible improved to meet the minimum standards (sufficient) or better of the Bathing Water Directive. This has significant tourism implications.

## Soil and Land Quality

The following indicators were used to ascertain baseline conditions:

- Percentage land stock contaminated (DEFRA);
- Percentage land stock derelict (DEFRA);
- Percentage land stock vacant (DEFRA);
- Distribution of best and most versatile agricultural land (Magic.gov);
- Percentage of new homes built on previously developed land (DEFRA); and,

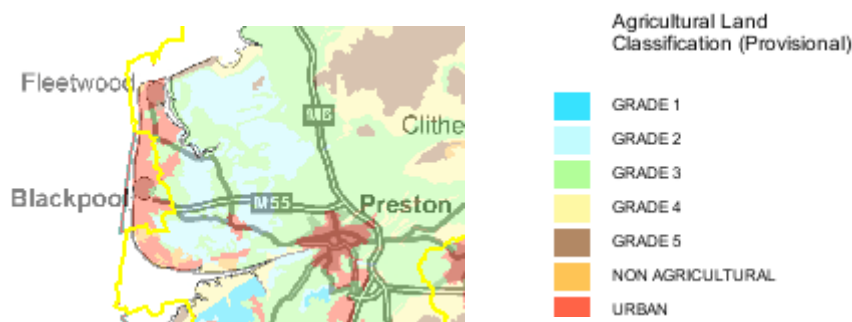
- Distribution of areas known to have been subject to significant subsidence (DEFRA).

The management and control of contaminated sites in the Borough is essential to reduce the risks posed to the natural and built environment and human health. The Blackpool Contaminated Land Strategy aims to identify potentially contaminated sites in the Borough and classifies them into risk levels. A percentage of the total land area likely to be contaminated is not currently available. There are no sites on the Environment Agency pollution inventory which relate to incidents of land pollution.

0.3% of land stock in the Borough is classified as derelict (2004) compared with 22.35% nationally. The region as a whole contains a high proportion of the country’s derelict land stock with 25% being contained in the North West alone. Blackpool’s low proportion is due to the small and urban nature of the Borough and competition for development land. In addition to the urban area and urban fringe there is a small proportion of grade 2 and 3 agricultural land to the east of the Borough (see figure 5.5).

Government policy encourages the re-use of brownfield sites. Between 2014 and 2015, approximately 94% of new homes in the Borough were built on previously developed sites. This is higher than the previous year. This is comparable to the Lancashire average and significantly higher than in other parts of the county.

Figure 5.3: Distribution of Agricultural Land (DEFRA – www. magic.gov.uk)



Map produced by MAGIC on 21 November 2005. Copyright resides with the data suppliers and the map must not be produced without their permission. Some information in MAGIC is a snapshot of information being maintained or continually updated by the originating organisation. Please refer to the documentation for details, as information may be illustrative or representative rather than definitive at this stage.

## Data Gaps and Uncertainties

- Percentage of land stock contaminated
- Percentage land stock vacant;
- More up to date soil data.

## Key Issues and Opportunities

Need to maintain a range of housing supply whilst maintaining levels of brownfield development in preference to greenfield sites. Given Blackpool’s constrained boundaries there is a need to consider accommodation of future development needs in the context of the Fylde coast as a whole.

It should be noted that some brownfield sites may have ecological value.

## Air Quality

The following air quality indicators were used to characterise the baseline environmental conditions and key trends:

- Distribution/number of Air Quality Management Areas (AQMAs) (DEFRA, 2016);
- Annual Average Air Quality measurements for Nitrogen Dioxide and Particulates in town centres of principal urban areas and AQMAs.

- Distribution of known key polluting industry.

One air quality management area (AQMA) has been designated in Blackpool encompassing parts of Blackpool Town Centre, and extending along Talbot Road to the seafront and Dickson Road to its junction with Pleasant Street. This has been designated for Nitrogen Dioxide (NO<sub>2</sub>) emissions as a consequence of traffic congestion. Air quality is monitored outside Hawes Side Library on Hawes Side Lane.

One operator has been identified on the Environment Agency Pollution Inventory for release of Ammonia and Volatile Organic Compounds (VOCs) to the air in 2004.

### Data Gaps and Uncertainties

- Annual Average Air Quality measurements for Nitrogen Dioxide and Particulates in town centres of principal urban areas and AQMAs.

### Key Issues and Opportunities

An AQMA is designated in and adjoining the town centre as a result of traffic emissions. Blackpool's ambitions for town centre and resort regeneration are likely to increase traffic levels. The management of air quality needs to be fully considered in future development and traffic management proposals.

## Climatic Factors and Energy

The following indicators were used to characterise the baseline conditions and key trends:

- Distribution of areas at risk of coastal and fluvial flooding (Strategic Flood Risk Assessment (SFRA), 2014);
- Number of planning applications permitted contrary to Environment Agency advice on flooding;
- Household energy use;
- Percentage energy from renewable sources;
- Percentage household waste used for energy;
- Total CO<sub>2</sub> emissions (kg) per household per year (Lancashire.gov); and
- Electricity and gas consumption in the commercial/business sector per year.

Climate change is a global phenomenon, although the consequences of climate change are being increasingly felt at the local level, for example flooding. Blackpool is a coastal town and consequently at risk of coastal flooding. The main areas at risk are along the sea front up to the main promenade and also some inland areas to the north in Carleton and to the south between the town centre and South Shore (see figure 5.4). The Council have commenced a major programme of sea defence and coast protection works covering the length of the promenade from Anchorsholme to Starr Gate. This is nearing completion. There are also issues relating to storm water flooding in residential areas. To date, there have not been any planning applications permitted contrary to Environment Agency advice on flooding.

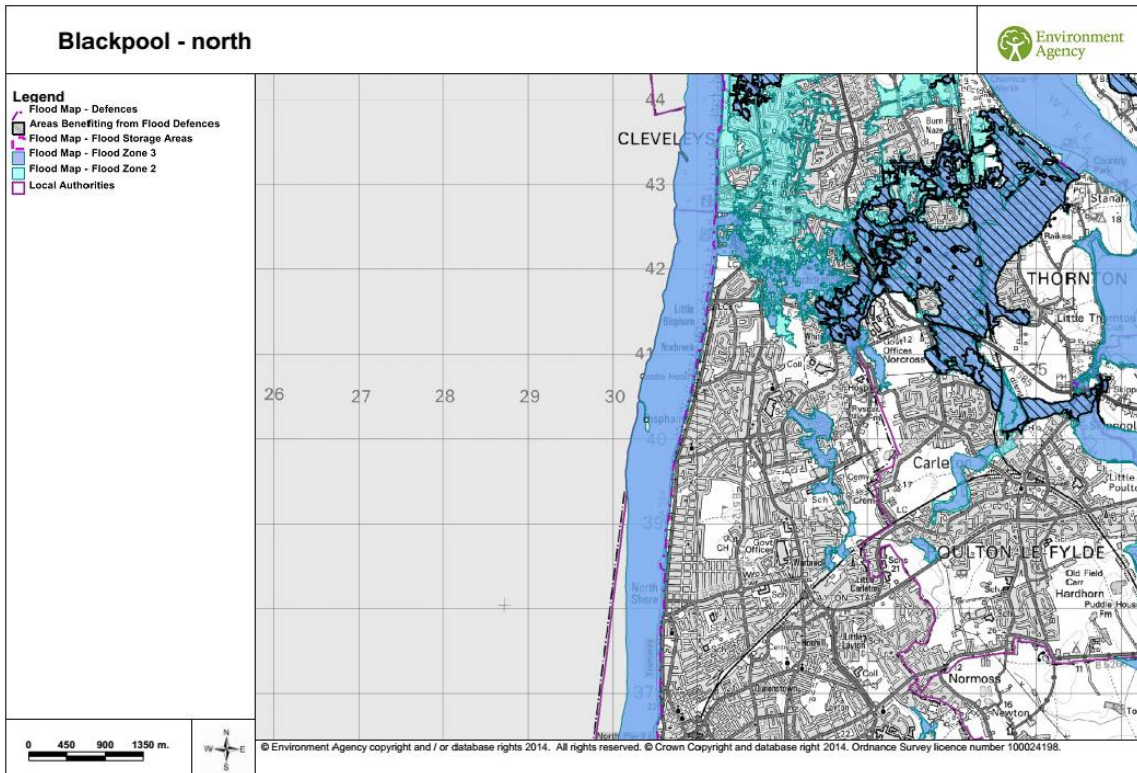
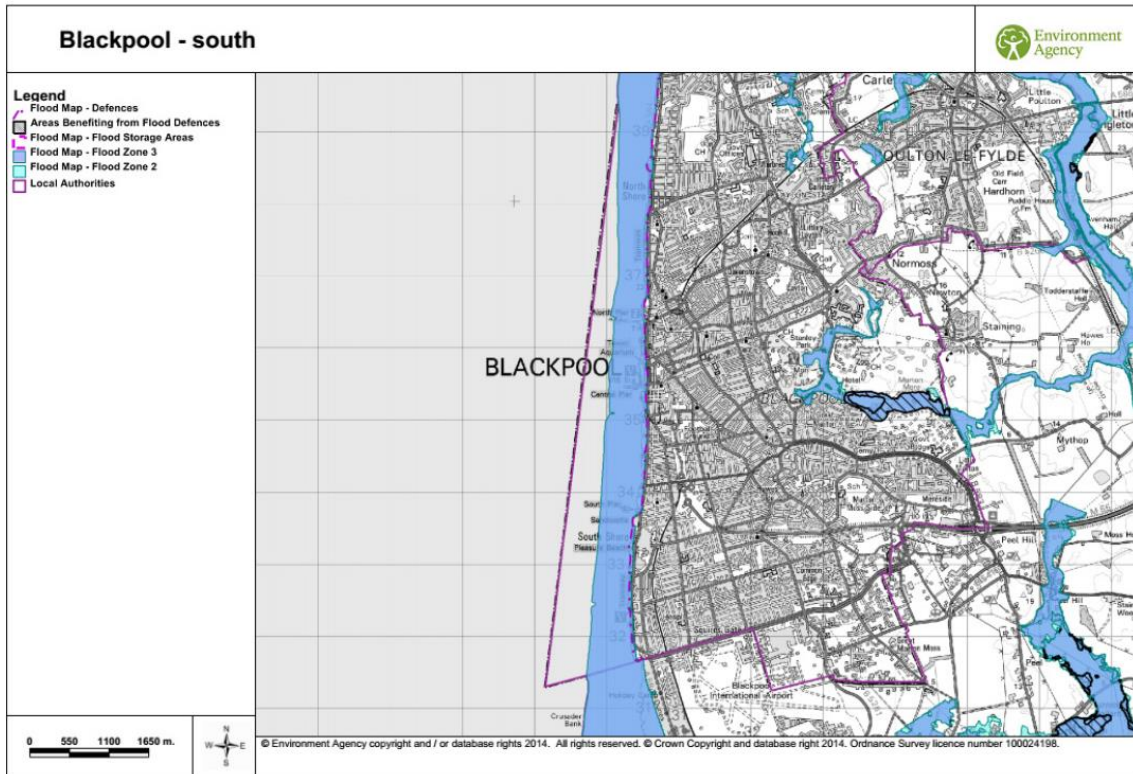
Green Infrastructure has multifunctional benefits which can help mitigate against and adapt to climate change. Green Infrastructure can help manage flood risk, such as through flood storage areas and slowing the flow through SUDs, improve the connectivity of habitats and allow species to adapt and enhance riparian corridors and to help cool watercourses.

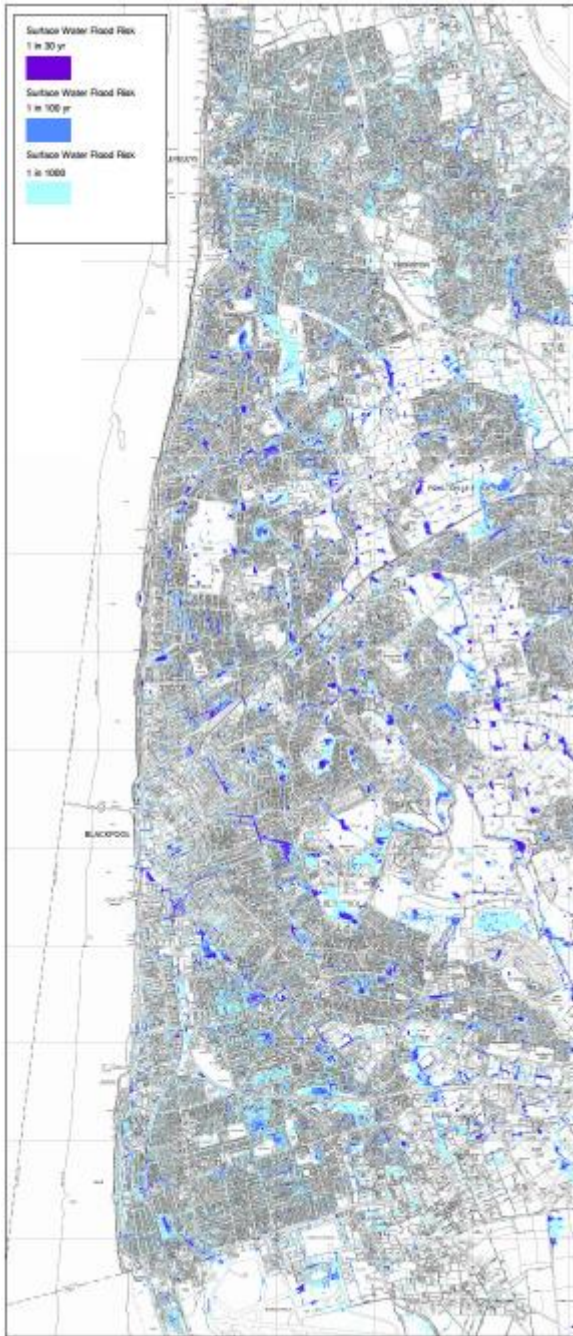
In Blackpool, carbon dioxide emissions are very low when measured in terms of tonnes per resident.

Gas consumption is slightly above the national level and electricity consumption slightly below. No household waste is currently used to recover heat, power or other energy sources. There are no renewable energy facilities within the Borough.

The 2015 AMR stated that there were no planning applications incorporating renewable energy into their designs between 2013 and 2015.

Figure 5.4: Indicative Flood Risk Mapping for Blackpool ([www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)) and Surface Water Flood Risk (SFRA 2016)





### Data Gaps and Uncertainties

- Percentage energy from renewable sources;
- Total CO<sub>2</sub> emissions (kg) per household per year; and,
- Electricity and gas consumption in the commercial/business sector per year.



## Key Issues and Opportunities

Flooding and flooding potential are issues illustrative of climate change and could have severe effects for residents. Flooding as a constraint should be given consideration in the development of the Local Plan Part 2 and also the causes of localised flooding and means to reduce that.

The promotion of Sustainable Drainage Systems is seen as an important opportunity to reduce surface run-off rates.

## Biodiversity, Flora and Fauna

The following indicators were used to characterise the baseline conditions and key trends:

- Distribution of international, national (Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and local (Local Nature Reserves (LNR)) wildlife sites (Magic.gov);
- SSSI in favourable condition and/or area (Lancashire.gov);
- Number of designated sites in land management schemes (Lancashire.gov);
- Woodland/farmland bird populations and change (Lancashire.gov);
- Key Biodiversity Action Plan (BAP) species and habitats present (Lancashire.gov);
- Area of Ancient Woodland (Magic.gov);
- Area and connectivity of wildlife corridors (Lancashire.gov); and,
- Access to green space (Lancashire.gov).

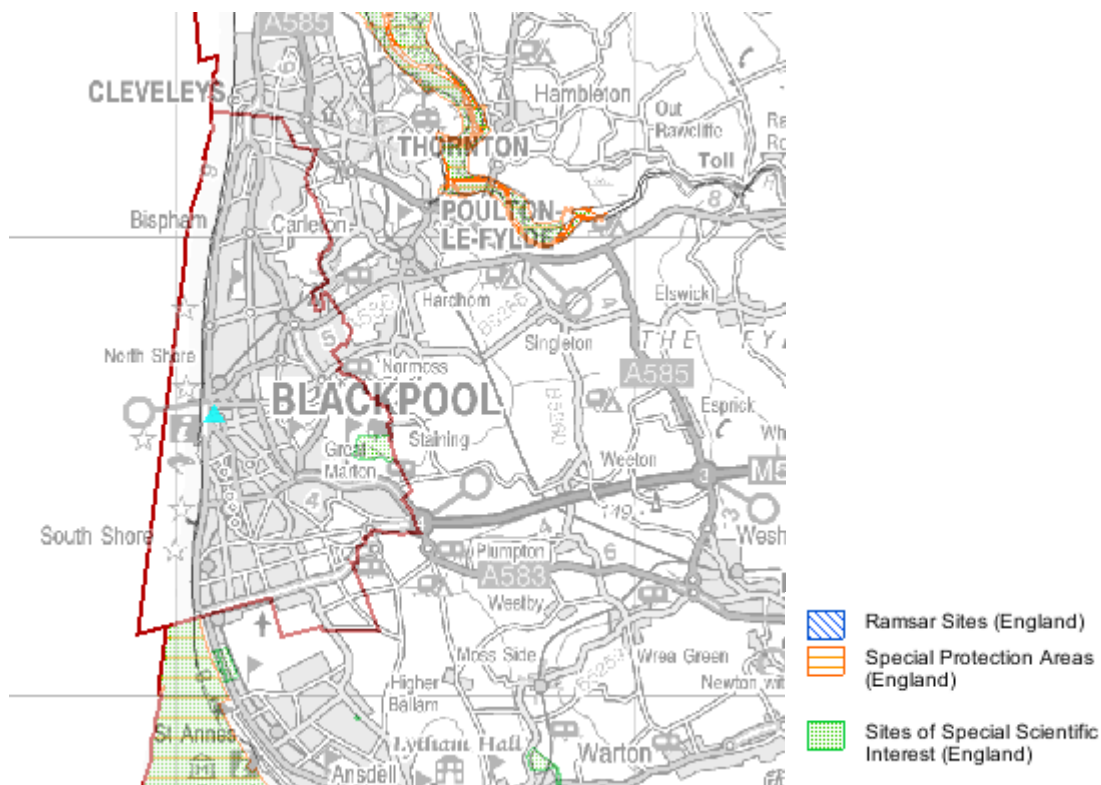
Blackpool is a largely urban Borough meaning that the remaining open land has important landscape and environmental value and increases the importance of optimising the amenity value of the remaining undeveloped land. There is one Site of Special Scientific Interest (SSSI)– Marton Mere, which is also a Local Nature Reserve (LNR). This covers about 39 hectares and is one of the few remaining freshwater lakes in Lancashire supporting a large number of bird species throughout the year. 100% of the area of this SSSI is in favourable condition which is well above national and regional averages. Key sites are identified in figure 5.7. There are 13 further sites of non-statutory nature conservation interest in the Borough, many of which are within public open space near the Borough's eastern boundary. Many are ponds.

A number of Lancashire BAP species are present in the Borough, although largely either in the eastern, less urbanised extremities, designated conservation areas or within pockets of greenspace within urban areas. BAP habitats present include Arable Farmland, Mossland, and Sand Dunes to the south. BAP species include: Skylark, Songthrush, Reedbunting, various species of bats and butterflies and Great Crested Newts. Populations of woodland birds are small, although small numbers of Skylark, Songthrush and Reedbunting are present. There are no areas of ancient woodland within the Borough and wooded areas are sparse within the largely urban area.

Urban greenspace is discussed in the landscape section and is an important component of enhancing the urban environment and the natural environment within it.

Blackpool's coastline and foreshore are well used by tourists and local residents for recreational purposes. Coastal water pollution has in the past been an issue, although major improvements in sewage treatment have improved the situation greatly. Sand is currently extracted from St. Annes and Lytham in Fylde for commercial purposes and there are concerns that this may cause issues for protecting the large expanse of beaches in Blackpool.

Figure 5.5: Location of SSSI, SPA and SACs ([www.magic.gov.uk](http://www.magic.gov.uk))



### Data Gaps and Uncertainties

- Number of designated sites in land management schemes; and,
- Area and connectivity of wildlife corridors.

### Key Issues and Opportunities

Blackpool’s status as a mass visitor destination poses a potential threat to environmentally sensitive sites unless managed appropriately.

Marion Mere SSSI affords protection and maintenance of favourable condition.

Should make positive contribution to achieving BAP targets.

Due to the urban nature of much of the Borough, all sites of potential nature conservation value are rare and should be afforded high levels of protection and enhancement.

The protection of the natural environment and urban greenspace have many positive implications for regenerating the Borough for local residents and visitors.

### Cultural Heritage

The following indicators were used to characterise the baseline conditions and key trends:

- Distribution and number of listed buildings, Scheduled Monuments, conservation areas, historic parks and gardens (Magic.gov); and
- Percentage of listed buildings at risk of decay and trends (Heritage at risk, 2015).

Blackpool developed as a seaside resort in the late 18th century with the first hotels being developed in the 1780s catering for the wealthy visitor. With the opening of the railway in 1846, workers travelled to the town from all over Lancashire and Yorkshire for ‘Wakes Week’, when factories and mills closed for the annual holiday. The first promenade opened in 1856, the north pier in 1863, and the outdoor Pleasure Gardens in 1872. In 1879, Blackpool was the first place in the world to have electric street lighting, giving birth to the

famous illuminations. After this time the town grew rapidly, with large hotels, guest-houses, and lodgings being built to cater for the growing number of visitors. This marked the birth of the golden age of Blackpool which was responsible for the development of many of the famous landmarks and attractions known today including many fine Victorian-style buildings earmarked for restoration as part of the current regeneration proposals. In the 1880s Blackpool became home to the first electric tram system which is still popular today and many early models of tram are still in use.

Nowadays, despite competition from cheaper holidays abroad, the resort still attracts over 8 million visitors a year and the history of tourism and its past legacy is very much part of the cultural heritage of the town.

Blackpool's heritage resource is largely centred around the historic core of the town. Blackpool has 42 listed buildings although no Scheduled Monuments. There is one Grade I listed building – the Tower and four Grade II\* listed buildings. The remainder are Grade II listed. There are two buildings on the 'at risk' register.

Many of the listed buildings are situated in the Town Centre conservation area. The other conservation area comprises Stanley Park and its immediate environs. The Park is also listed in the Register of Historic Parks and Gardens (Grade II\*, 80.4ha).

### Data Gaps and Uncertainties

- No significant data gaps or uncertainties identified

### Key Issues and Opportunities

Distinct cultural heritage resource in the town centre which affords protection. This poses opportunities for tourism and regeneration potential.

In addition to preserving statutory sites it is important to ensure that the wider historic townscape is protected and that cultural heritage issues are taken into consideration in all new developments that occur in the Borough.

## Landscape

The following indicators were used to characterise the baseline conditions and key trends:

- Landscape/townscape characterisation (Lancashire.gov);
- Distribution and area of Areas of Outstanding Natural Beauty (AONB), National Parks and county landscape designations (Lancashire.gov); and
- Distribution of Green Belt (Lancashire.gov).
- Conservation Areas

There are no landscape designations in Blackpool. The Borough is predominantly urban or urban fringe with a small area of the Landscape classification, 'South Fylde Mosses' further inland, as designated under the Lancashire Landscape Character Assessment. The mosses are very flat low-lying areas comprised of peat deposits which were formerly raised mires which have now been reclaimed for agriculture. Blackpool's town centre developed relatively haphazardly in the late nineteenth century as a result of its growth as a Victorian seaside resort. The Winter Gardens, Tower, sea, beach piers and amusements formed the early and distinctive basis of development. Blackpool town centre has been designated a conservation area in recognition of this. A further conservation area is at Stanley Park. Suburban areas developed and distinctive areas formed in response to the style of the time. The condition of many residential areas in particular wards has deteriorated and lead to some particularly run-down areas of town.

Urban greenspace is a key element in the regeneration of the Borough and in achieving urban renaissance. Two main areas have been designated in the current Local Plan which are safeguarded as urban greenspace. These are at Warren Drive and Geldof Drive/Warley Road.

Some small pockets of Green Belt are designated near the periphery of the Borough in order to prevent coalescence with St.Annes and with Carlton. 'Countryside Areas' are also designated at Marton Moss and between Newton Hall and Preston New Road. These areas also impose strict requirements on any development in the countryside.

## Data Gaps and Uncertainties

- There are no significant data gaps or uncertainties.

## Key Issues and Opportunities

Blackpool is predominantly urban in character and illustrates the historic development of the town as a seaside resort. Many areas are considered to be run-down in appearance and their enhancement would form a key component of wider regeneration proposals.

The historic core and Conservation Areas need to be conserved and enhanced for marketing the area's image as a place to live and visit and for contributing to the quality of life of its residents. Enhancing urban greenspace is also an important element of this.

## Minerals and Waste

The following indicators were used to characterise the baseline conditions and key trends:

- Household waste arising;
- Recycled household waste as a percentage of total household waste (Lancashire.gov);
- Percentage of household waste landfilled (Lancashire.gov, 2015);
- Percentage of household waste composted (Lancashire.gov, 2015);
- Industrial and commercial waste production; and
- Sales of secondary and recycled aggregates as a percentage of all aggregates sold.

Household waste arisings per head in Blackpool are well above the national and county averages, being 511.3kg per head in 2005/6. However, of this, only 15.54% was recycled and 10.58% was composted making a total of 26.12%, compared to the national average of 27%. 60.1% of household waste went to landfill in Blackpool in 2014/2015, which has increased since 2005/2006 where 73.8% of waste went to landfill. This is above the national average of 56.3%. The quantity of industrial/commercial waste has not been identified.

There are no strategic landfill sites in Blackpool, although there is one waste transfer station. The majority of Blackpool's waste is disposed of at Jameson Road Landfill in Wyre, Clifton Marsh Landfill in Fylde and Westby Brickworks in Fylde.

To reduce the need to use natural resources, recycled and secondary materials should be used where feasible in construction projects and new developments that occur in the Borough. However, it has not been possible to obtain any data about this issue to date.

## Data Gaps and Uncertainties

- Industrial and commercial waste production
- Sales of secondary and recycled aggregates as a percentage of all aggregates sold.

## Key Issues and Opportunities

There are no major strategic waste disposal facilities in Blackpool and it is a net exporter of waste.

Household waste production is high and recycling rates are lower than national and county averages, although they are improving. The majority of municipal waste is landfilled, which is not sustainable.

Sustainable sourcing and waste management principles should be promoted for all new developments that occur in Blackpool.

## Transportation

The following indicators were used to characterise the baseline conditions and key trends:

- Distribution of major transport systems – roads, airports, ports, rail etc (google maps, 2016);
- Journey to work by mode (ONS, 2015);

- Percentage of residents travelling over 20km to work (ONS, 2015);
- Number of ICT schemes implemented; and,
- Percentage of dwelling approved and located within 400m of a proposed or existing bus stop or within 800m of and existing or proposed railway station.

The economic viability and quality of life for local residents is closely linked to the effectiveness of the local transport system and infrastructure. The M55 and Blackpool airport provide effective links into and out of the Borough and the majority of visitors arrive by car. However, internal links pose issues. The highway network comprises a grid of north south routes which can become heavily congested, particularly at junctions where incoming visitor traffic conflicts with internal traffic movements. An AQMA has been designated in response to traffic induced pollution. Blackpool airport provides economic opportunities for attracting new investment into the area and enabling indigenous business to create trade links on a national and international basis

The Blackpool North to Manchester via Preston railway is an important public transport link to other key economic and population centres in the region. The proposed electrification of this line is an important component of this. Blackpool is well served in terms of bus services, generating significant levels of all-year bus passenger movement. The Borough also houses Britain's oldest electric tramway.

Around 50% of residents travel to work by private car or van which is below national and county averages and a higher than average proportion of people travel on foot. There is a greater reliance on modes other than the private car in both the resident and visiting population than in other local authorities in Lancashire. A higher than average proportion of people also work from home, although the wider use of ICT could contribute to reduced travel.

Blackpool has a high proportion of workers who have a relatively short commute to work. The 2011 census indicated that 25.6% of Blackpool's working residents aged 16 and older commute less than two kilometres. This is the highest percentage in Lancashire and is in excess of the regional and national averages. The authority also has the highest proportion of workers who commute between 2-5km to work, at a percentage of 28.6%.

### Data Gaps and Uncertainties

- Number of ICT schemes implemented
- Percentage of dwelling approved and located within 400m of a proposed or existing bus stop or within 800m of and existing or proposed railway station.

### Key Issues and Opportunities

Links could be greatly improved from the north, north-east and south of the Borough and particularly within the town itself.

Localised congestion and associated adverse air quality is an issue.

The public transport system is extensive and well used, although there are opportunities to enhance this further.

Blackpool airport is an opportunity for economic growth and the marketing of Blackpool and its surrounding sub-region.

## Economy

The following indicators were used to characterise the baseline conditions and key trends:

- Wards with SOAs in bottom 10% for income deprivation (Annual Monitoring Report (AMR, 2015));
- Number of VAT registrations;
- Employment sectors;
- Percentage unemployed;
- Economic interest in Blackpool based on industrial planning application figures;
- Pattern of industrial and office rental costs;

- % of residents who think that for their local area over the past three years that job prospects have got better or stayed the same;
- Visitor Volumes in a year;
- Number of ICT schemes implemented;
- Economic interest in Blackpool based on industrial planning application figures;
- Advertised vacant industrial floorspace; and,

The majority of economic activity in Blackpool is tourism related, catering for more visitors than any other resort in the UK and generating £545m expenditure per annum (Regeneration Strategy for Blackpool) There is also a high level of public sector employment, with Blackpool accommodating a number of large Government offices. Whilst there is no tradition of heavy industry, the town's small manufacturing sector includes local specialism in food and drink, and plastics. Jobs in tourism and the service sector are generally low skill and low wage leading to lower productivity and a seasonal economy. In addition, three decades of resort decline has led to an underperforming economy and high levels of deprivation, and the town centre is underperforming as a sub-regional centre. Whilst the visitor economy remains a key growth sector, there is a need to provide sustainable job opportunities in other sectors to diversify the local economy and improve economic prosperity (AMR 2015).

In 2012 there were 3,165 VAT/PAYE registered businesses in Blackpool, which compares to 3,250 in 2007 (Source: DTI). This decline was offset by modest growth in Wyre and Fylde, meaning Blackpool's business base became a smaller part of the sub-regional economy over this period. Blackpool also has a lower business density compared to the Fylde Coast, with fewer businesses per head of the working age population (AMR 2015).

The majority of Blackpool businesses are in retail (15.6%) and accommodation / food service (14.1%) sectors. There is also a higher representation of health and arts, entertainment, recreation and other services sectors compared to elsewhere (AMR 2015).

However, Gross Value Added (GVA) per head is well below the Lancashire, regional and national averages (£11, 972 in 2013) (AMR 2015). The bulk of visitors have limited disposable income and employment patterns are typified by low pay and short-term contracts (Regeneration Strategy for Blackpool). Survey work since 1989 suggests that total visitor numbers and day trips have fallen whilst overnight stays have increased. About 87% of employment in Blackpool is in the service sector. Small companies dominate in Blackpool.

6.6 % of the economically active population (which equates to 4,100 people) are unemployed, which is higher than the North West figure of 5.3% and the national figure of 5.1%. 38.6% of all employees in Blackpool are in part time employment, compared to 31.3% in the North West and 30.9% in England (Nomis 2014/15). However, the Borough has a very low proportion of economically active people. Employment follows the seasonal trends of the tourism industry in terms of summer peaks and winter troughs. There are 31 wards in Blackpool which have LSOAs in the bottom 10% of employment deprivation nationally. The employment deprivation domain of the IMD takes account of:

- Unemployment claimant count the Joint Unemployment and Vacancies Operating System Cohort (JUVOS) of women aged 18-59 and men aged 18-64 averaged over 4 quarters
- Incapacity Benefit claimants women aged 18-59 and men aged 18-64
- Severe Disablement Allowance claimants women aged 18-59 and men aged 18-64

The key employment sectors in 2014 were (ONS 2014):

Primary Services (A-B: Agriculture And Mining) 0%,

Energy And Water 0.4%

Manufacturing 6.2%,

Construction 2.7%,

Services 90.6%

Wholesale And Retail, Including Motor Trades 16.7%, Transport Storage 2.3%, Tourism 12.9%, Information And Communication 1.6%

Financial And Other Business Services 8.6%

Public Admin,

Education And Health 40.2%

Other Services 8.3%

Blackpool’s tourist attractions have received little major investment over recent years with the exception of the Pleasure Beach. This has led to the resort becoming less competitive with cheap foreign destinations becoming more attractive. Until recently, the number of visitors to the resort had been declining. However, recent visitor economy data has shown an upturn in visitor numbers for the last two years, with 2014/15 attracting 10.16 million visitors. There is a large volume of tourist accommodation although much of the stock is of relatively low quality, lacking any national or local accreditation. There is 97,233m<sup>2</sup> (2015) of advertised vacant industrial floor space in the Borough. Economic diversity is also skewed with a disproportionately small proportion of manufacturing employment.

The development of quality service provision and tourist attraction is considered essential and full advantage needs to be taken of Blackpool airport as a regional hub and gateway to northern England. Development of a quality natural environment as part of urban regeneration is also seen as a major factor of this. Blackpool is also the sub-regional centre for Fylde and it is important that this role is strengthened in terms of business opportunities and employment for many neighbouring Borough.

Educational attainment and aspiration amongst residents is low, which is allied to the relatively small proportion of working age population.

Figure 5.6: Blackpool – Employment Domain for Blackpool SOAs by Ranking Position in England– ODPM English Indices of Deprivation 2015. (<http://dclgapps.communities.gov.uk/imd/idmap.html>)

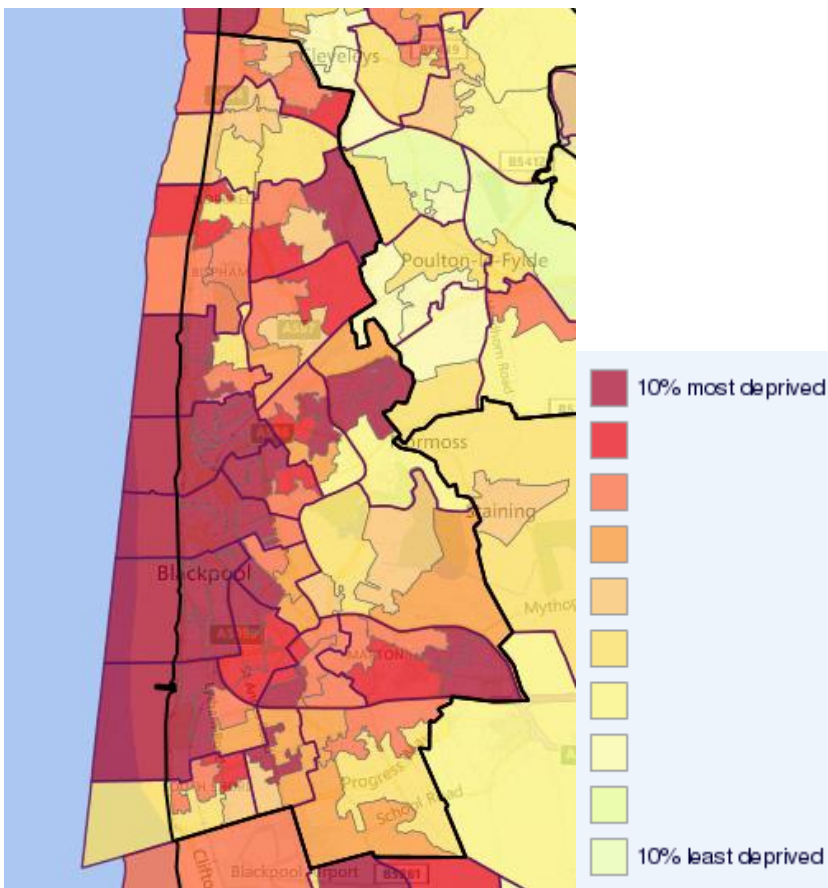
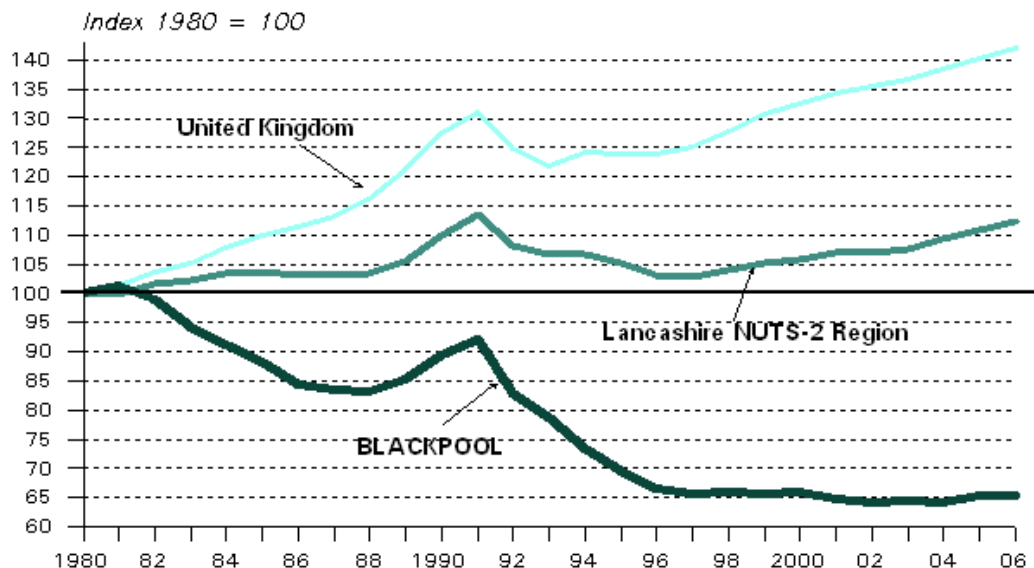


Figure 5.7: Change in VAT Registered Business Stock 1980-2006  
 (<http://dclgapps.communities.gov.uk/imd/idmap.html>)

### CHANGE IN VAT REGISTERED BUSINESS STOCK, 1980-2006



Source Small Business Service - VAT Registrations & De-registrations, 1994-2005

#### Data Gaps and Uncertainties

- Number of ICT schemes implemented.
- Peak Zone A rental data £/m<sup>2</sup>.

#### Key Issues and Opportunities

The economy is not very diverse being dominated by the tourism sector. It is vital that this sector is developed sustainably and focuses on quality of product and visitor offer. This is closely linked to environmental protection and enhancement.

The public sector, retail and accommodation/food and drink are the key sources for employment in Blackpool with manufacturing also playing an important role.

Seasonal unemployment is an issue.

Visitor numbers are steadily declining as competition increases from cheap foreign destinations.

Productivity (GVA) is low compared to county, regional and national averages partly as a result of the over-representation of service jobs such as distribution, hotels and restaurants.

Small companies dominate which require support. The wholesale and retail sector is the largest category of VAT registrations. These have remained fairly static since 1999 but have fallen overall since the early 1990s.

There is a large volume of tourist accommodation although this is generally low quality.

Opportunity to strengthen Blackpool's role as a sub-regional hub for the Fylde.



## Deprivation

The following indicators were used to characterise the baseline conditions and key trends:

- Recorded crime rates per 1000 for key offences;
- Percentage males/females feeling 'very unsafe' about crime;
- Crime Deprivation - Wards with LSOAs within bottom 10% deprived (IMD);
- Average earnings per ward compared with national/regional average;
- Claimants of work related benefits (income support) compared to national/regional average;
- Claimants of jobseekers allowance compared to national/regional average;
- Number and distribution of wards with LSOAs in the bottom 10% of most deprived living environment;
- Number and distribution of wards with LSOAs in bottom 10% of most deprived in terms of barriers to housing and services provision;
- Areas within 1km of 5 basic services;

Deprivation is a multi-faceted and complex problem which influences and is influenced by a number of different factors including crime, housing, education, access to services, employment etc. Many of these issues have been addressed in other sections, although this section focuses on crime, living environment and employment benefits.

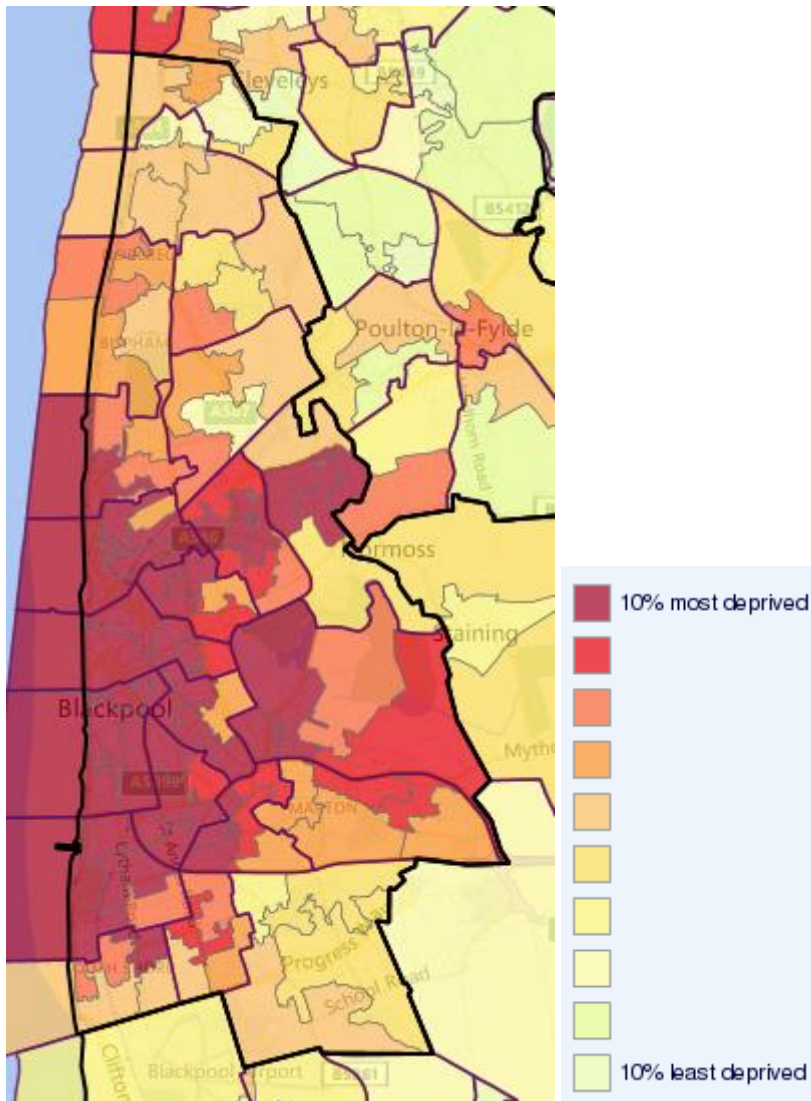
### *Crime*

Crime rates per 1000 in Blackpool for key offences are generally comparable to national and county averages, although violent crime is well above national and county averages. Much of this is focussed in the town centre and is often related to alcohol related crime, which is seen as a big problem. Alcohol related crime is often related to criminal damage. In 2012-2012 there were 16,876 recorded crimes in Blackpool. Violent crime accounted for 27% (4574) of all crime in 2011-12. This was a 6% (276) reduction. Assaults with injury increased by 5% (90) and harassment by 45% (78), most other categories contributed to the reduction. Of note, rape fell by 30% (24), all sexual offences by 11% (28), robbery by 12.6% (19), and possession of weapons by 22% (28). In 2015, it was recorded that there are 38 LSOAs in Blackpool with crime figures in the bottom 10% of the LSOA (IMD, 2015). This includes the area with the worst crime deprivation in the whole of England.

People also have fear of crime, particularly at night. The figures are comparable to the national average, although they have risen sharply in recent years. Youth nuisance is slowly decreasing in Blackpool, an inverse trend to the rest of Lancashire.

There is concern over drugs related crime and the links with other forms of crime such as drug dealing and acquisitive crime. Whilst the high levels of misuse are not uncommon elsewhere, Blackpool has some of the highest numbers of drug and alcohol related deaths in the country (Blackpool Community Safety and Drugs Audit 2004).

Figure 5.8: Blackpool – Crime Deprivation Domain for Blackpool SOAs by Ranking Position in England– ODPM English Indices of Deprivation 2015. (<http://dclgapps.communities.gov.uk/imd/idmap.html>)



### Earnings Deprivation

Full-time weekly average earnings in the Borough are well below county, regional and national levels and nine wards have LSOAs which are in the bottom 10% income deprived (Bloomfield (5); Brunswick (3); Claremont (3); Clifton (2); Hawes Side (1); Ingthorpe (1); Park (3); Tyldesley (1); Waterloo (1)) (Index of Multiple Deprivation, 2015). Claimants of job-seekers allowance are above national and regional averages.

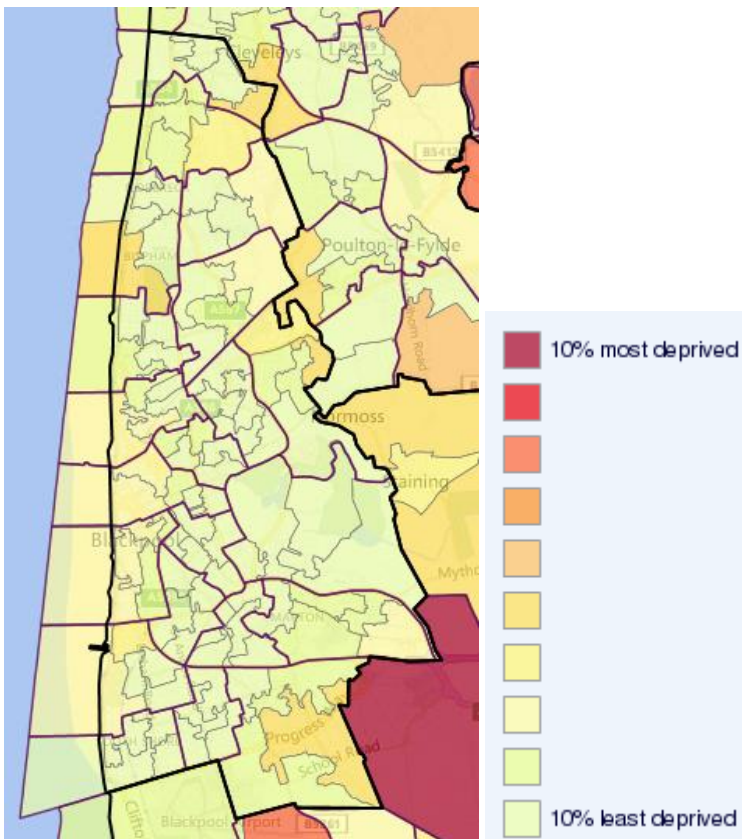
### Living Environment

The living environment in Blackpool is mixed. It is predominantly an urban area, so access to services appears to be good. However, living environment deprivation appears to be an issue in certain wards. Access to sports facilities is above national levels with 37.9% of the population in 2005 living within 20 minutes travel time of a range of 3 different sports facility types, compared to 20.86% nationally. Over 93% of residents are within 1km of 5 basic services, and 94.2% of new dwellings were in 2004. Between 2013 and 2015 100% of new residential development was within 30 minutes public transport time of a GP, hospital, primary and secondary school, employment and major health centre.

Living environment deprivation and barriers to housing and services provision deprivation are both monitored in the English Indices of Deprivation. 33 wards have LSOAs in the bottom most 10% deprived in terms of living environment. This is based upon Social and Private Housing in Poor Condition, Houses without Central

Heating, Air Quality and Road Traffic Accidents involving injury to pedestrians and cyclists. However, there are no wards which have LSOAs in the bottom 30% in terms of barriers to housing and services provision. This index is based upon: Household overcrowding, Local Authority level percentage of households for whom a decision on their application for assistance under the homeless provisions of housing legislation has been made, assigned to the constituent SOAs, Difficulty of Access to owner-occupation, Road distance to GP premises, Road distance to supermarket or convenience store, Road distance to primary school, and Road distance to a Post Office.

Figure 5.9: Blackpool – Barriers to housing and services Deprivation Domain for Blackpool SOAs by Ranking Position in England– ODPM English Indices of Deprivation 2015. (<http://dclgapps.communities.gov.uk/imd/idmap.html>)



### Data Gaps and Uncertainties

- No significant gaps at this stage.

### Key Issues and Opportunities

Levels of violent crime are high and are focused in the town centre and are often related to alcohol. Alcohol related crime is often related to criminal damage.

Substance misuse is also an issue with drug possession and dealing rates being above the county and regional average. This has links to fear of crime and acquisitive crime.

There is a need to tackle the root causes of crime.

Earnings in Blackpool are low and the percentage of claimants of Job-Seekers Allowance is higher than national averages.

Access to services in Blackpool is generally good due to its small size and urban nature, although issues relate to quality living environments as there are 16 wards with SOAs in the bottom 25% nationally for Living Environment Deprivation.

## Housing

The following indicators were used to characterise the baseline conditions and key trends:

- Average house price;
- Housing affordability;
- Percentage homes unfit for use compared to national/regional averages;
- Percentage development type distribution/housing densities per hectare;
- Number of people accepted as homeless as a percentage of social rented housing; and
- Affordable housing completions.

Blackpool is the fourth most densely populated local authority in England and Wales outside Greater London with a population density of 3,988 persons per kilometre (Census, 2011). In 2014/15 52% of new dwellings were built at a density above 50 dwellings per hectare.

As with much of the country, house prices in Blackpool have risen sharply in recent years with the average price of a detached house costing £208,500, a Semi-detached costing an average £160,000, a terraced house costing £82,500 and flats costing £70,000 (rightmove 2016). This is rising but is still below the regional and national average. The rate of house price growth has been greater than the rate of income growth, which presents affordability issues. In 2014/15, 111 affordable units were completed compared with none in 2013/14 (AMR 2015).

Housing tenure is a particular issue in Blackpool. 62% of dwellings are owner-occupied, 26% are privately rented which is well above the England figure of 17% (AMR 2015). Within the four wards of Bloomfield, Claremont, Talbot and Waterloo, over one third of the housing stock is privately rented. Four other wards of Brunswick, Clifton, Inglethorpe and Park have the largest proportions of local authority rented accommodation. The clustering of such housing can lead to social problems and a high rate of turnover. In 2004, 7% of housing stock was considered unfit for use, which is above national levels and regional levels (6.1%). Blackpool is also one of the most overcrowded districts in England and Wales based upon occupancy (Census 2011). Also, 19% of households reside in accommodation without central heating (Census 2011).

### Data Gaps and Uncertainties

- Percentage of homeless people in Blackpool

### Key Issues and Opportunities

Blackpool's large stock of poor quality, cheap, private rented accommodation sector particularly within its inner areas attracts deprived and vulnerable individuals perpetuating and exacerbating housing and social problems.

Lack of supply of affordable housing is also a major issue.

Overcrowding is an issue and a large proportion of houses are in multiple occupation.

A high proportion of houses do not have central heating.

## 7 The Appraisal Process

### 7.1 Geographical Scope of the SA

The geographical scope of the SA will be driven by the geographical scope of the Local Plan Part 2 i.e. the entirety of Blackpool. The Local Plan Part 2 must be in general conformity with the Core Strategy and so policies should be aligned. Regarding the allocations element of the Local Plan Part 2 the SA will consider the spatial extent of their likely impacts. In some cases this may be only local to the site in question whereas in other cases the impacts of the allocation may be felt over a wider area including potentially outside the Borough. Similarly, the cumulative effects of a number of allocations may result in impacts occurring over a wider area. These will also be considered in the SA.

### 7.2 Temporal Scope of the SA

As the Local Plan is intended to apply until 2027. This timescale will be reflected in the SA of the Local Plan Part 2. If there are likely to be any sustainability effects of the Local Plan Part 2 that would last longer than this, these would also be considered.

### 7.3 Aspects of the Local Plan Part 2 to be assessed and how

Individual components of the Local Plan Part 2 will be assessed to determine their sustainability performance and to provide recommendations for sustainability improvements. At this stage in the Local Plan Part 2's development it is anticipated that the following elements will need to be assessed:

- The land allocations (housing, employment)
- Reasonable alternatives to these land allocations.
- DM Policies
- Reasonable alternatives to these policies

The intention will be to ensure that the process is iterative with regular feedback occurring between the plan-makers and the SA team as options are developed. Allocations will be appraised in turn to determine how well they perform against the SA Framework Objectives. Policies will be appraised as a whole against each of the SA Objective topics. The assessors will consider each of the guide questions whilst drawing a conclusion on the performance against the headline objective.

The appraisal will be presented in an appraisal matrix for each group of policies and allocations. The matrix is an established method for clearly analysing the performance of the policies or sites and helps meet the requirements of the SEA Regulations by ensuring that the following elements are considered. This will enable significant effects to be identified:

- Impact – whether the impact will be positive, negative or neutral when assessed against the SA Objectives.
- Temporal scale – whether the impact will be short-term (within 5 years), occur in the medium term (5 – 10 years) or occur in the long-term (10 years +).
- Spatial scale – where the impacts will occur within the area. Any transboundary effects outside of the study area would also be considered.
- Permanency – whether effects will be permanent or temporary.
- Level of certainty – the level of certainty in the prediction will be classified as low, medium or high.
- Cumulative and synergistic effects.

Where negative impacts are identified, measures will be proposed to offset, avoid or otherwise mitigate for the impact. In addition, measures which may further enhance benefits will also be identified as appropriate.

The scoring used for the appraisal of the policy/allocation is defined below:

Table 7-1: Notation used in the SA Assessment

Impact	Description	Symbol
Major Positive Impact	The allocation/policy contributes to the achievement of the SA Objective and is likely to deliver enhancements.	++
Positive Impact	The allocation/policy contributes partially to the achievement of the SA Objective but not completely.	+
No Impact/ Neutral	There is no clear relationship between the allocation/policy and/or the achievement of the SA Objective or the relationship is negligible.	0
Negative Impact	The allocation/policy partially detracts from the achievement of some elements of the SA Objective.	-
Major Negative Impact	The allocation/policy detracts from the achievement of all elements of the SA Objective.	--
Uncertain impact – more information required	It is not possible to determine the nature of the impact as there may be too many external factors that would influence the appraisal or the impact may depend heavily upon implementation at the local level.	?
Positive and Negative Impacts	The allocation/policy has a combination of both positive and negative contributions to the achievement of the SA Objective.	+/-

The assessment of the allocations will also make use of Geographical Information Systems (GIS) to identify the relationship between the allocations and existing environmental and sustainability features, for example designated sites. Maps will be prepared that zoom into the areas where allocations are proposed to provide more detail at the assessment stage. Socio-economic factors cannot so easily be mapped using GIS although as a minimum, spatial data can be obtained pertaining to the different facets of deprivation and access to services. It will be important to consider the immediate local impacts of the allocations as well as the wider Borough and regional implications. Where appropriate, the assessment will consider existing evidence and research when making linkages between new development and the types of impact this could have on different strands of the community, for example, community cohesion, equality, health etc.

In all cases, the assessment of allocations will make good use of the baseline data collated which will be supplemented with further detail as appropriate at the assessment stage. When assessing each element, the questions will be asked:

- To what extent does the allocation meet the SA Objectives?
- To what extent will the allocation seek to address key sustainability issues?
- To what extent will the allocations/ affect the current baseline conditions?

It should also be remembered that this is a strategic assessment, and, whilst allocations will be assessed individually, it is not the intention to enter into the level of detail reserved for project-level Environmental Impact Assessment. All assessment will be desk-based.

In addition to assessing sites individually, the cumulative effects of multiple sites will also be assessed. This will consider how the allocations throughout the entire area and, where appropriate, more localised groups of allocations might affect specific receptors and receptor types. This would also consider the cumulative effects of sites within individual settlements where appropriate and in particular any cumulative impacts on

local character. These might include the receptor topic of biodiversity, for example at the district level, or specific ecological features or designations at the sub-district level. Cumulative effects of policy proposals together with sites and other potential plans and projects will also be considered.

## 7.4 Assessment of Alternatives

It is a requirement of the SEA Directive that alternatives are assessed and, therefore, alternative options will be assessed using the SA Framework. The purpose of the assessment will be to determine the sustainability strengths and weaknesses of each option such that this information can be used by the plan-makers to inform their decision to select the preferred options.

The number of site and policy alternatives is currently not known.

Each alternative site allocation and policy will be appraised using the same appraisal matrix identified above. The table will also identify whether the site is being taken forward as a preferred option and why or whether it is a rejected alternative and why.

## 7.5 The SA Framework

### Background to the SA Framework

The SA Framework underpins the assessment methodology and comprises a series of Sustainability Objectives (covering social, economic and environmental issues) that are used to test the performance of the plan being assessed. Whilst the SEA Directive does not require the use of Sustainability Objectives, they are a recognised tool for undertaking the assessment and are aspirations/goals that an authority/organisation should work towards achieving.

The Sustainability Objectives are separate from the Local Plan Objectives, although there may be some overlaps between them. To help measure the performance of the Plan components against the Sustainability Objectives, it is beneficial if they are supported by a series of indicators and targets. Baseline data should be collated to support each of the indicators, as this provides a means of determining current performance across the Borough and gauging how much intervention or the extent of work needed to achieve the targets that have been identified. The following sections provide further details about the development of the SA Framework.

### Development of the Sustainability Objectives

The Sustainability Objectives were previously developed for the SA of the Core Strategy (Local Plan Part 1) using the review of other relevant plans, programmes and environmental objectives, the baseline data and the key issue and opportunities. After a detailed review of the Sustainability Objectives set out for the preparation of Core Strategy, it was deemed that the Objectives remain relevant to the preparation of Local Plan Part 2 and therefore there is no requirement for any further Sustainability Objectives to be identified.

Table 7-1 presents the proposed objectives, indicators and targets that will be used in the assessment of the Plan. Where possible, the indicators selected link to those used to describe the baseline conditions across the Borough, as an understanding of the existing conditions is needed to inform the assessment. Each of the Sustainability Objectives is supported by a series of sub-objectives to add further clarity and to assist the assessment process.

Those indicators written in italics highlight current data gaps which will be reviewed and additional information gathered where possible.

The targets included in Table 7-1 will need to be reviewed throughout the SA process to take account of updates and the development of new, more challenging targets.

Table 7-1 SA Objectives, Indicators and Targets

SA Objective and Sub-Objectives	Indicators	Targets
<b>1. To reduce crime, disorder and fear of crime</b>		
<p>To reduce levels of crime</p> <p>To reduce the fear of crime</p> <p>To reduce alcohol and drug misuse</p> <p>To reduce levels of anti-social behaviour</p> <p>To encourage safety by design</p>	<p>Number and distribution of wards with LSOAs in the bottom 10% most deprived for crime deprivation.</p> <p>Crime rates per 1,000 of the population for key offences.</p> <p>Number of new development actively incorporating safety by design principles.</p> <p>Number of new initiatives implemented to tackle anti-social behaviour.</p>	<p>Reduce the number of crimes per '000 population.</p>
<b>2. To improve levels of educational attainment for all age groups and all sectors of society</b>		
<p>To improve access to lifelong learning opportunities and other adult education</p> <p>To increase levels of participation and attainment in education for all members of society.</p> <p>To increase the percentage of young people who progress into further and higher education and work-based training.</p>	<p>Location and number of educational establishments in Blackpool.</p> <p>Number and distribution of wards with LSOAs in the bottom 10% most deprived for education, skills and training deprivation.</p> <p>Percentage of 15 year old pupils in local authority schools achieving 5 or more GCSEs at Grades A* - C or equivalent.</p> <p>Percentage of people aged 16-74 achieving National Vocational Qualification (NVQ) level 4 or above.</p> <p>Percentage of resident adults with no qualifications.</p> <p>Percentage of 16-19 year olds continuing in to higher education.</p>	<p>At least 95% of adults to have basic skills in both functional literacy and numeracy.</p> <p>At least 90% of adults to hold at least level 2 qualifications or equivalent.</p> <p>At least 40% of adults to hold at least level 4 qualifications or equivalent.</p> <p>increase access to education facilities</p>
<b>3. To improve physical and mental health for all and reduce health inequalities</b>		
<p>To improve access to health and social care services</p> <p>To reduce health inequalities amongst different groups in the community</p> <p>To promote healthy lifestyles</p> <p>To increase/improve access to greenspace</p>	<p>Percentage of the resident population who consider themselves to be in good health.</p> <p>Number of wards with LSOAs in the bottom 10% most deprived for health deprivation and disability.</p> <p>Life expectancy at birth for males and females.</p> <p>Percentage of working-age population with a long-term limiting illness.</p> <p>Percentage of adults (16+) taking part in sport and active</p>	<p>Increase the number of adults and young people participating in sport and physical activity through increasing accessibility to sport facilities and recreational space.</p> <p>Increase access to health services.</p> <p>Reduce Health Inequalities</p> <p>Maintain and increase number of people claiming to be in good health.</p>



SA Objective and Sub-Objectives	Indicators	Targets
	recreation at least three times a week). <i>Number and distribution of sports facilities and recreational space.</i>	
<b>4. To ensure housing provision meets local needs</b>		
To reduce the number of unfit homes To reduce multi-occupancy and improve the quality of rented accommodation To increase the availability of decent quality affordable housing for all To reduce levels of homelessness	Average house price. Percentage of home owners Percentage of homes deemed unfit. Percentage of housing vacant. Number of affordable housing completions per annum.	Increase the number of affordable homes provided in the Borough in accordance with housing targets. Increase the number of empty properties brought back into use. Increase percentage of home owners
<b>5. To protect and enhance community spirit and cohesion</b>		
To improve relations between all social groups To develop opportunities for community involvement	Percentage of people in Blackpool who are happy where they live Percentage of people in Blackpool who take part in decision making and leisure activities within the community.	Increase the percentage of residents who are happy where they live Increase the percentage of residents who take part in decision making and leisure activities within the community.
<b>6. To improve access to basic goods, services and amenities for all groups</b>		
To improve access to cultural and recreational facilities To maintain and improve access to essential services and facilities	Number of LSOAs in the bottom 10% most deprived for barriers to housing and services provision. Number of essential services and facilities within local settlements.	Increase access to basic services and amenities. No net loss of basic services and amenities.
<b>7. To encourage sustainable economic growth and business development across the Borough</b>		
To increase levels of employment and to increase the range of local employment opportunities To encourage economic growth To encourage new business formation To strengthen Blackpool as a Sub-Regional Centre	Location of key industries and major employers. Economic activity rate. Employment by sector. Number of VAT registered businesses. Visitor numbers and tourist revenue data.	Increase number of VAT registered businesses. Provision of sufficient employment land to meet economic needs. No net loss in employment land provision. Increase the visitor spend on tourism Decrease the numbers of employed people currently working outside of the District.

SA Objective and Sub-Objectives	Indicators	Targets
<b>8. To promote sustainable tourism</b>		
<p>To encourage sustainable tourism</p> <p>To support the preservation and or development of high quality built and natural environments within the Borough</p> <p>To modernise the tourism industry</p>	<p>The number of tourists per year in Blackpool.</p> <p>Built and natural environment within the Borough.</p>	<p>Increase in the number of staying tourists a year in Blackpool.</p> <p>To enhance the built and natural environment whining the Borough.</p>
<b>9. To encourage economic inclusion</b>		
<p>To reduce levels of unemployment in areas most at need</p> <p>Improve household earnings</p>	<p>Number of wards with LSOAs in the bottom 10% most deprived for employment deprivation.</p> <p>Number of wards with LSOAs in the bottom 10% for income deprivation.</p> <p>Percentage of unemployed working-age population</p> <p>Location of employment areas relative to housing.</p>	<p>Increase accessibility to employment areas in particular for LSOAs exhibiting higher levels of employment and income deprivation.</p>
<b>10. To deliver urban renaissance</b>		
<p>Improve vitality and vibrancy of town centres</p> <p>To improve access to public transport in urban areas</p>	<p>The LSOA values for all deprivation areas within the town centres</p> <p>Number of people who travel to work by transport</p>	<p>Decrease the number of areas with LSOA values below 10% for all deprivation areas within the town centre.</p> <p>Increase the percentage of residents who travel to work by public transport rather than drive.</p>
<b>11. To develop and market the Borough as a place to live, work and do business</b>		
<p>To support the preservation and or development of high quality built and natural environments within the Borough</p> <p>To promote the area as a destination for short and long term visitors and new residents</p> <p>To enhance the Borough's image as an attractive place to do business</p>	<p>The number of wards with LSOA values in the bottom 10% for economic deprivation</p> <p>The number of wards with LSOA values in the bottom 10% for educational deprivation</p>	<p>Reduce number of Super Lower Output Areas (LSOA's) in the bottom 10% for health deprivation and Disability</p> <p>Improve the overall education of Blackpool's population</p>
<b>12. To protect, maintain and enhance green infrastructure, biodiversity and geodiversity</b>		

SA Objective and Sub-Objectives	Indicators	Targets
<p>To protect, maintain and enhance designated sites of nature conservation importance</p> <p>To protect, maintain and enhance sites of green infrastructure</p> <p>To protect, maintain and enhance wildlife especially rare and endangered species</p> <p>To protect, maintain and enhance habitats and wildlife corridors</p> <p>To provide opportunities for people to access wildlife and open green spaces</p> <p>To protect, maintain and enhance sites of geodiversity importance</p>	<p>Number and distribution of designated sites including SSSI's</p> <p>Condition of SSSIs.</p> <p>Proportion of the population that has full access to the requirements of the Accessible Natural Green Space Standard</p> <p>Number of habitats created, protected or enhanced.</p>	<p>Maintain and improve number of SSSIs in favourable condition.</p> <p>Increase access to greenspace per head.</p>
<p><b>13. To protect and enhance the Borough's landscape and townscape character and quality</b></p>		
<p>To protect and enhance landscape character and quality</p> <p>To protect and enhance townscape character and quality</p> <p>To promote sensitive design in development</p>	<p>Number, location, size and character of conservation areas.</p> <p>Amount of development in the Borough</p> <p>conservation areas at risk</p>	<p>No inappropriate development in the Borough</p> <p>No net loss of conservation areas.</p> <p>No increase in conservation areas at risk.</p>
<p><b>14. To protect and enhance the cultural heritage resource</b></p>		
<p>To protect and enhance historic buildings and sites</p> <p>To protect and enhance historic landscape/townscape value</p>	<p>Number and distribution of Listed Buildings, Scheduled Monuments, conservation areas and Registered Parks and Gardens.</p> <p>Percentage of listed buildings or other assets on the English Heritage at risk register.</p> <p>Number of permissions granted against English heritage advice.</p>	<p>No increase in heritage at risk as a result of new development.</p>
<p><b>15. To protect and enhance the quality of water features and resources and to reduce the risk of flooding</b></p>		
<p>To protect and enhance ground and surface waters</p> <p>To protect and enhance coastal waters</p> <p>To encourage the inclusion of flood mitigation</p>	<p>Distribution of areas at risk of fluvial flooding (Environment Agency)</p> <p>Percentage of rivers with good/fair chemical and biological water</p>	<p>To introduce SuDs into new development</p> <p>No planning permissions granted against EA advice</p> <p>To meet minimum requirements or better of the</p>

SA Objective and Sub-Objectives	Indicators	Targets
measures To encourage the sustainable use of water resources	quality Number of planning applications granted permission contrary to Environment Agency advice Compliance with Bathing Water Directive	Bathing Water Directive at all monitoring points.
<b>16. To guard against land contamination and encourage the appropriate re-use of brownfield sites within the urban boundary and to protect soil resources</b>		
To reduce the amount of derelict, contaminated, and vacant land. To encourage development of brownfield land where appropriate To protect soil functions To prevent the contamination of controlled waters	Percentage of housing completions on previously developed land. Percentage of employment development on previously developed land.	100% of new and converted dwellings on previously developed land Greater than 51% of employment land permitted for development on previously developed land [2015 AMR]
<b>17. To limit and adapt to climate change</b>		
To reduce or manage flooding To reduce greenhouse gas emissions To encourage the inclusion of SuDS To promote the development of multifunctional green infrastructure.	Total carbon dioxide (CO <sub>2</sub> ) emissions per capita per year. Number of SuDS implemented across Blackpool. Number of planning applications granted permission contrary to Environment Agency advice regarding flooding. Number of GI projects implemented across Blackpool	To reduce per capita CO <sub>2</sub> emissions each year. No planning applications permitted contrary to EA advice on flooding. Number of new developments where SuDS are appropriately used to increase each year.
<b>18. To protect and improve air quality</b>		
To protect and improve local air quality	Number and distribution of AQMAs. Combined Air Quality Indicator Scores for LSOAs in Blackpool.	No new AQMAs to be designated in Blackpool or increase the area or size of the existing AQMA.
<b>19. To increase energy efficiency and require the use of renewable energy sources</b>		
To increase energy efficiency To increase the use of renewable energy To reduce the use of energy	Total carbon dioxide (CO <sub>2</sub> ) emissions per capita per year. Annual average domestic gas and electricity consumption per consumer. Annual gas and electricity consumption in the commercial/industrial sector. Number of applications for renewable energy developments and	To reduce per capita CO <sub>2</sub> emissions each year. Include more developments with renewable energy systems implemented into the design.

SA Objective and Sub-Objectives	Indicators	Targets
	details of their location.	
<b>20. To ensure sustainable use of natural resources</b>		
To reduce the demand for raw materials To promote the use of recycled and secondary materials in construction	Incorporation of secondary and recycled materials in new development projects. Number of sustainable design schemes implemented. Use of BREEAM <sup>4</sup> in new developments.	Increase use of secondary and recycled materials in construction for new developments. Increase use of water efficiency schemes in new developments.
<b>21. To minimise waste, increase re-use and recycling</b>		
To increase the proportion of waste recycling and re-use To reduce the production of waste To reduce the proportion of waste landfilled	Levels of composting and recycling achieved. Amount of household waste landfilled.	Increase the percentage of municipal waste recycled from. Decrease the amount of fly-tipping.
<b>22. To promote the use of more sustainable modes of transport</b>		
To reduce the use of private car To encourage walking, cycling and the use of public transport Encourage the uptake of ICT	Journey to work by mode. Public transport patronage. Percentage of dwellings approved and located within 400m of an existing or proposed bus stop or within 800m of an existing or proposed railway station.	To increase use of sustainable transport and reduce private car dependence. To increase access to broadband internet across the Borough (for residential and employment uses).

<sup>4</sup> BREEAM (BRE Environmental Assessment Method) is a widely used environmental assessment method for buildings. It sets standards for best practice in sustainable design and can be used to assess a building's environmental performance.



# APPENDIX A

## Plans and Programmes Reviewed

### International Plans

- World Summit on Sustainable Development, Johannesburg (2002)
- European Sustainable Development Strategy (2006)
- EU Seventh Environment Action Programme to 2020 (2014)
- European Spatial Development Perspective (ESDP) (1999)
- Aarhus Convention (Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters) (1998)
- United Nations (UN) Framework Convention on Climate Change (1992)
- Kyoto Protocol to the UN Framework Convention on Climate Change (1997)
- Second European Climate Change Programme (2005)
- Directive to Promote Electricity from Renewable Energy (2001/77/EC)
- European Transport Policy for 2010: A Time to Decide (2001)
- EU Directive on Ambient Air Quality and Cleaner Air for Europe (2008/50/EC)
- Water Framework Directive (WFD) (2000/60/EC)
- Drinking Water Directive (98/83/EC)
- Nitrates Directive (91/676/EEC)
- Directive on the Assessment and Management of Flood Risks (2007/60/EC)
- UN Convention on Biological Diversity (1992)
- Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979)
- Bonn Convention on the Conservation of Migratory Species of Wild Animals (1979)
- Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (92/43/EEC)
- EU Biodiversity Strategy (1998)
- European Landscape Convention (2000)
- Waste Framework Directive (2008/98/EC)
- Directive on the Landfill of Waste (99/31/EC)
- EU Birds Directive 2009/147/EC
- Bathing Water Directive 2006/7/EC

### National Plans

- Planning Act 2008
- World Class Places: The Government's Strategy for Improving Quality of Place (2009)
- The Countryside in and Around Towns: A vision for connecting town and country in the pursuit of sustainable development (2005)
- Sustainable Communities, Settled Homes, Changing Lives – A Strategy for Tackling Homelessness (ODPM) (2005)
- Climate Change Act (2008)

- Stern Review of the Economics of Climate Change (2006)
- UK Carbon Plan (2011)
- Climate change and biodiversity adaptation: the role of the spatial planning system – a Natural England commissioned report (2009)
- Planning for Climate Change – Guidance and Model Policies for Local Authorities (2010)
- Energy Act 2011
- Delivering a Sustainable Transport System (2008)
- The Future of Transport White Paper – A Network for 2030 (2004)
- Low Carbon Transport: A Greener Future - A Carbon Reduction Strategy for Transport (2009)
- Wildlife and Countryside Act (1981) (as amended)
- The Conservation of Habitats and Species Regulations (2010)
- The Countryside and Rights of Way (CRoW) Act (2000)
- The Natural Environment and Rural Communities Act (2006)
- The Guidance for Local Authorities on Implementing the Biodiversity Duty (2007)
- Conserving Biodiversity – The UK Approach (2007)
- Working with the Grain of Nature: a Biodiversity Strategy for England (2002)
- The UK Post-2010 Biodiversity Framework (2012)
- Biodiversity by Design: A Guide for Sustainable Communities (Town and Country Planning Association) (2004)
- Biodiversity Indicators in Your Pocket (2010) Defra
- A Strategy for England's Trees, Woodlands and Forests (2007)
- Landscape Character Assessment Guidance for England and Scotland (2002)
- Open Space Strategies: Best Practice Guidance (CABE and the Greater London Authority, 2009)
- The Geological Conservation Review (GCR) (ongoing)
- Safeguarding our Soils: A Strategy for England (Defra, 2009)
- Natural England's Green Infrastructure Guidance (2009)
- Accessible Natural Green Space Standards in Towns and Cities: A Review and Toolkit for their Implementation (2003) and Nature Nearby: Accessible Green Space Guidance (2010)
- Historic Environment: A Force For the Future (2001)
- The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)
- Water Resources Strategy for England and Wales (2009)
- Future Water: The Government's Water Strategy for England (2008)
- Flood and Water Management Act (2010)
- Making Space for Water: Taking Forward a New Government Strategy for Flood and Coastal Erosion Risk Management (2005)
- Waste Strategy for England (2007)
- The Egan Review – Skills for Sustainable Communities (2004)
- Working for a Healthier Tomorrow – Dame Carol Black's Review of the health of Britain's working age population (2008)



- Health Effects of Climate Change in the UK 2008 – An update of the Department of Health Report 2001/2002
- Tackling Health Inequalities – A Programme for Action (2003, including the 2007 Status Report on the Programme for Action)
- By All Reasonable Means: Inclusive Access To The Outdoors For Disabled People (Countryside Agency, 2005)
- National Planning Policy Framework (2012)
- National Planning Practice Guidance (2013 with ongoing updates)
- Localism Act (2011)
- Guidance Notes for the Reduction of Light Pollution (2000)
- Good Practice Guide on Planning for Tourism (2006)

## **Regional and County Level Plans and Programmes**

- Lancashire's Local Transport Plan 2011 – 2021
- Joint Lancashire Minerals and Waste Development Framework Core Strategy DPD (2009)
- Joint Lancashire Minerals and Waste Local Plan Part 2 – Site Allocation and Development Management Policies Part 1 and Part 2 (2013)
- Lancashire's Municipal Waste Strategy 2008 – 2020 Rubbish to Resources
- Lancashire Strategic Economic Plan (2014)
- Lancashire Growth Deal (2014)
- Lancashire Growth Plan 2013/2014
- City Implementation Plan 2015-2018
- Lancashire Sport Partnership Strategy 2013-2017
- Countryside Character Volume 2: North-West (1998)
- Lancashire Landscape Character Assessment and Landscape Strategy (2000)
- Lancashire Climate Change Strategy 2009 -2020
- Biodiversity Action Plan for Lancashire (various dates)
- Lancashire Woodland Vision 2006-2015
- North West River Basin District Flood Risk Management Plan 2015-2021 (2016)
- North West River Basin Management Plan: Part 1 and Part 2 (2015)
- Lancashire and Blackpool Flood Risk Management Strategy (2013)
- Lancashire County Council Rights of Way Improvement Plan 2015-2025 Consultation Draft

## **Local Level Plans and Programmes**

- Lancashire Rights of Way Improvement Plan (2015- 2025)
- Blackpool Local Plan Part 1: Core Strategy 2016
- Homelessness Strategy 2008-2010
- Blackpool Council Local Transport Plan 2011-2016
- Blackpool Community Safety Plan 2012-2015

- Blackpool Local Development Scheme (LDS) 2014
- Destination Management Plan for Blackpool 2015-2017
- Blackpool Council Plan 2015-2020
- Blackpool Town Centre Strategy 2013
- Built Heritage Strategy 2016-2020
- Health and Wellbeing Strategy 2012-2015
- Child Poverty Framework 2012-2015
- Community Safety Plan 2012-2015
- Children and Young People's Plan 2016-2019
- Fylde Coast Growth Accelerator Strategy 2016-2026
- Lancashire and Blackpool Flood Risk Management Strategy 2014-2017
- Blackpool Statement of Community Involvement (SCI) November 2014
- Blackpool Council School Organisation Pupil Place Plan 2015-2020

# Summary of International Plans

International Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to DPD and SA	Implications for DPD	Implications for SA
<b>World Summit on Sustainable Development, Johannesburg (2002)</b>			
<p>The World Summit reaffirmed the international commitment to sustainable development. The aims are to:</p> <ul style="list-style-type: none"> <li>▪ Accelerate the shift towards sustainable consumption and production with a 10-year framework of programmes of action</li> <li>▪ Reverse the trend in loss of natural resources</li> <li>▪ Urgently and substantially increase the global share of renewable energy</li> <li>▪ Significantly reduce the rate of loss of biodiversity by 2010</li> </ul>	<p>No specific targets or indicators, however key actions include:</p> <ul style="list-style-type: none"> <li>▪ Greater resource efficiency</li> <li>▪ Support business innovation and take up of best practice in technology and management</li> <li>▪ Waste reduction and producer responsibility</li> <li>▪ Sustainable consumer consumption and procurement</li> <li>▪ Create a level playing field for renewable energy and energy efficiency</li> <li>▪ New technology development</li> <li>▪ Push on energy efficiency</li> <li>▪ Low-carbon programmes</li> <li>▪ Reduced impacts on biodiversity</li> </ul>	<p>The DPD should contribute to the protection and enhancement of biodiversity and encourage resource efficiency when allocating land.</p>	<p>The SA Framework should include objectives relating to renewable energy use, biodiversity protection and enhancement, and careful use of natural resources.</p> <p>It should include objectives to cover the action areas.</p>
<b>European Sustainable Development Strategy (2006)</b>			
<p>The Strategy sets out how the European Union (EU) will effectively live up to its long-standing commitment to meet the challenges of sustainable development. It reaffirms the need for global solidarity and the importance of strengthening work with partners outside of the EU.</p> <p>The Strategy sets objectives and actions for seven key priority challenges until 2010. The priorities are:</p> <ul style="list-style-type: none"> <li>• Climate change and clean energy</li> <li>• Sustainable transport</li> <li>• Sustainable consumption and production</li> <li>• Conservation and management of natural resources</li> <li>• Public Health</li> <li>• Social inclusion, demography and migration</li> <li>• Global poverty and sustainable development challenges</li> </ul>	<p>There are no specific indicators or targets of relevance.</p>	<p>The DPD needs to take on board the key objectives, actions and priorities of the Strategy and contribute to the development of more sustainable communities by creating places where people want to live and work.</p>	<p>The SA Framework should include objectives that complement those of this Strategy.</p> <p>Addressing transport, health, climate change, accessibility and biodiversity protection and enhancement.</p>
<b>EU Seventh Environment Action Programme to 2020 (2014)</b>			
<p>The programme lists nine priority objectives and what the EU needs to do to achieve them by 2020. They are:</p> <ol style="list-style-type: none"> <li>1. to protect, conserve and enhance the Union's natural capital to turn the Union into a resource-efficient, green, and competitive</li> </ol>	<p>The programme identifies three priority areas where more action is needed to protect nature and strengthen ecological resilience, boost resource-efficient, low-carbon growth, and reduce threats to human health and</p>	<p>The DPD should be mindful of the broad goals of the Plan, e.g. recognising that local</p>	<p>The SA should be mindful that documents prepared will need to conform to EU goals</p>

International Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to DPD and SA	Implications for DPD	Implications for SA
<p>low-carbon economy</p> <ol style="list-style-type: none"> <li>2. to safeguard the Union's citizens from environment-related pressures and risks to health and wellbeing</li> <li>3. to maximise the benefits of the Union's environment legislation by improving implementation</li> <li>4. to increase knowledge about the environment and widen the evidence base for policy</li> <li>5. to secure investment for environment and climate policy and account for the environmental costs of any societal activities</li> <li>6. to better integrate environmental concerns into other policy areas and ensure coherence when creating new policy</li> <li>7. to make the Union's cities more sustainable</li> <li>8. to help the Union address international environmental and climate challenges more effectively.</li> </ol>	<p>wellbeing linked to pollution, chemical substances, and the impacts of climate change.</p> <ol style="list-style-type: none"> <li>1. The first action area is linked to "natural capital" –from fertile soil and productive land and seas to fresh water and clean air – as well as the biodiversity that supports it. The EAP expresses the commitment of the EU, national authorities and stakeholders to speed up the delivery of the objectives of the 2020 Biodiversity Strategy and the Blueprint to Safeguard Europe's Water Resources. There are also topics which need further action at EU and national level, such as soil protection and sustainable use of land, as well as forest resources.</li> <li>2. The second action area concerns the conditions that will help transform the EU into a resource-efficient, low-carbon economy. This requires: <ul style="list-style-type: none"> <li>▪ full delivery of the climate and energy package to achieve the 20-20-20 targets and agreement on the next steps for climate policy beyond 2020;</li> <li>▪ significant improvements to the environmental performance of products over their life cycle;</li> <li>▪ reductions in the environmental impact of consumption, including issues such as cutting food waste and using biomass in a sustainable way.</li> </ul> </li> <li>3. The third key action area covers challenges to human health and wellbeing, such as air and water pollution, excessive noise, and toxic chemicals. The EAP sets out commitments to improve implementation of existing legislation, and to secure further reductions in air and noise pollution. The EAP also sets out a long-term vision of a non-toxic environment and proposes to address risks associated with the use of chemicals in products and chemical mixtures, especially those that interfere with the endocrine system.</li> </ol>	<p>action needs to be taken with regard to climate change issues, protecting and enhancing biodiversity and encouraging waste reduction and recycling.</p>	<p>and aims, and should therefore include appropriate objectives, indicators and targets in the SA Framework.</p>
European Spatial Development Perspective (ESDP) (1999)			
The ESDP is based on the EU aim of achieving balanced and	There are no specific targets or indicators of relevance.	The DPD needs to	The SA should include

International Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to DPD and SA	Implications for DPD	Implications for SA
<p>sustainable development, in particular by strengthening environmentally sound economic development and social cohesion. This means, in particular, reconciling the social and economic claims for spatial development with an area's ecological and cultural functions and, hence, contributing to a sustainable, and at larger scale, balanced territorial development.</p> <p>This is reflected in the three following fundamental goals of European policy:</p> <ul style="list-style-type: none"> <li>▪ Economic and social cohesion</li> <li>▪ Conservation of natural resources and cultural heritage</li> <li>▪ More balanced competitiveness of the European territory</li> </ul>	<p>Targets and measures are for the most part deferred to Member States.</p>	<p>recognise the tensions between social, economic and environmental issues, and should encourage sustainable development.</p>	<p>objectives that complement the principles of the ESDP. The issues outlined in this document are of particular relevance to Blackpool in view of the high quality environment but also the need for sustainable locations for new housing and economic development.</p>
<p><b>Aarhus Convention (Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters) (1998)</b></p>			
<p>In order to contribute to the protection of the right of every person of present and future generations to live in an environment adequate to his or her health and well-being, each Party subject to the convention shall guarantee the rights of access to information, public participation in decision-making, and access to justice in environmental matters in accordance with the provisions of this Convention.</p>	<p>As this is a high level EU policy document, responsibility for implementation has been deferred to the Member States:</p> <p>Each Party shall take the necessary legislative, regulatory and other measures, including measures to achieve compatibility between the provisions implementing the information, public participation and access-to-justice provisions in this Convention, as well as proper enforcement measures, to establish and maintain a clear, transparent and consistent framework to implement the provisions of this Convention.</p>	<p>The development of the DPD needs to be a transparent process, and Blackpool's Statement of Community Involvement identifies how stakeholder involvement will be achieved.</p>	<p>As part of the SA process the SA should highlight that while the DPD will be prepared mostly under the provisions of national legislation and strategies, it must still comply with principles in the Convention. The council should ensure that sufficient time is provided for consultation.</p>
<p><b>United Nations (UN) Framework Convention on Climate Change (1992)</b></p>			
<p>The convention sets an overall framework for intergovernmental efforts to tackle the challenge posed by climate change. It acknowledges that the climatic system is affected by many factors and is a shared system. Under the Convention governments have to:</p> <ul style="list-style-type: none"> <li>▪ Gather and share information on greenhouse gas emissions</li> <li>▪ Launch national strategies for climate change</li> <li>▪ Co-operate in adapting to the impacts of climate change</li> </ul>	<p>There are no specific targets or indicators of relevance.</p>	<p>The DPD should recognise that local action needs to be taken with regard to climate change issues.</p>	<p>The SA Framework should include objectives, indicators and targets that relate to climate change, flooding and the need to reduce greenhouse gas emissions.</p> <p>A number of locations across Blackpool are at risk of flooding and the</p>

International Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to DPD and SA	Implications for DPD	Implications for SA
			results of the Strategic Flood Risk Assessment should be considered in the SA.
<b>Kyoto Protocol to the UN Framework Convention on Climate Change (1997)</b>			
The Kyoto protocol, adopted in 1997, reinforced the UN Framework Convention on Climate Change. It addressed the problem of anthropogenic climate change by requiring developed countries to set legally binding emission reduction targets for greenhouse gases.	Industrial nations agreed to reduce their collective emissions of greenhouse gases by 5.2% from 1990 levels by the period 2008 to 2012. Countries can achieve their Kyoto targets by: <ul style="list-style-type: none"> <li>Reducing greenhouse gas emissions in their own country</li> <li>Implementing projects to reduce emissions in other countries</li> <li>Trading in carbon. Countries that have achieved their Kyoto targets will be able to sell their excess carbon allowances to countries finding it more difficult or too expensive to meet their targets</li> </ul>	The DPD should consider the broad goals of the Kyoto Protocol, e.g. recognising that local action needs to be taken with regard to climate change issues.	The SA Framework should include objectives, indicators and targets that relate to climate change, flooding and the need to reduce greenhouse gas emissions.  A number of locations across Blackpool are at risk of flooding and the results of the Strategic Flood Risk Assessment should be considered in the SA.
<b>Second European Climate Change Programme (2005)</b>			
The programme builds on the First Climate Change Programme and seeks to drive climate change mitigation across Europe, with the aim of limiting climate change and meeting Kyoto targets. It also seeks to promote adaptation to the effects of inevitable and predicted climate change.	Most initiatives in the programme refer to EU-wide elements of policy related, for example, to emissions trading, technological specifications and carbon capture and storage.  There are therefore no specific targets or indicators of relevance.	The DPD should take account of the need to understand and adapt to the potential impacts of climate change such as weather extremes and river flooding.	The SA Framework should include a target to contribute towards the mitigation and adaptation of the effects of climate change. As well as ensuring that policies are relevant from a climate change and flood risk perspective.
<b>Directive to Promote Electricity from Renewable Energy (2001/77/EC)</b>			
This Directive aims to promote an increase in the contribution of renewable energy sources to electricity production in the internal market for electricity and to create a basis for a future Community Framework.  Member States are obliged to take steps to increase the consumption of electricity produced from renewable energy sources, by setting	Member States are obliged to take appropriate steps to encourage greater consumption of electricity produced from renewable energy sources.  Global indicative target: 12% of gross national energy consumption by 2010 and 22.1% indicative share of electricity produced from renewable energy sources in	The DPD should recognise the importance of renewable energy and the need to increase the consumption of	The SA Framework should include objectives to cover the action areas and encourage energy efficiency.

International Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to DPD and SA	Implications for DPD	Implications for SA
national indicative targets, in terms of a percentage of electricity consumption by 2010.	total Community electricity consumption by 2010. UK target: renewables to account for 15% of UK consumption by 2020.	electricity produced from renewable energy sources.	
<b>European Transport Policy for 2010: A Time to Decide (2001)</b>			
This policy outlines the need to improve the quality and effectiveness of transport in Europe. A strategy has been proposed which is designed to gradually break the link between transport growth and economic growth to reduce environmental impacts and congestion. The policy advocates measures that promote an environmentally friendly mix of transport services.	There are no specific indicators or targets of relevance.	The development of the DPD should consider issues relating to transport and access.	The SA Framework should include objectives relating to the need for a sustainable and efficient transport system. Accessibility of communities to facilities should be a central consideration of the SA process.
<b>EU Directive on Ambient Air Quality and Cleaner Air for Europe (2008/50/EC)</b>			
The Directive demonstrates a commitment to improving air quality in the EU by setting binding standards for a number of air pollutants. It merges four previous directives and one Council decision into a single directive on air quality. It sets standards and target dates for reducing concentrations of SO <sub>2</sub> , NO <sub>2</sub> /NO <sub>x</sub> , PM <sub>10</sub> /PM <sub>2.5</sub> , CO, benzene and lead which are required to be translated into UK legislation. The Directive seeks to maintain ambient-air quality where it is good and improve it in other cases.	Thresholds for pollutants are included in the Directives.	The DPD should consider the maintenance of good air quality and the measures that can be taken to improve it; for example, reducing the number of vehicle movements.	The SA Framework should include objectives that address the protection of air quality.
<b>Water Framework Directive (WFD) (2000/60/EC)</b>			
The purpose of this Directive is to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater which: (a) prevents further deterioration and protects and enhances the status of aquatic ecosystems and, with regard to their water needs, terrestrial ecosystems and wetlands directly depending on the aquatic ecosystems (b) promotes sustainable water use based on a long-term protection of available water resources (c) aims at enhanced protection and improvement of the aquatic environment, inter alia, through specific measures for the progressive reduction of discharges, emissions and losses of priority substances and the cessation or phasing-out of discharges, emissions and losses of the priority hazardous substances	Objectives for surface waters: <ul style="list-style-type: none"> <li>▪ Achievement of good ecological status and good surface water chemical status by 2015</li> <li>▪ Achievement of good ecological potential and good surface water chemical status for heavily modified water bodies and artificial water bodies</li> <li>▪ Prevention of deterioration from one status class to another</li> <li>▪ Achievement of water-related objectives and standards for protected areas</li> </ul> Objectives for groundwater: <ul style="list-style-type: none"> <li>▪ Achievement of good groundwater quantitative and chemical status by 2015</li> </ul>	The DPD should consider how the water environment can be protected and enhanced, and should seek to promote the sustainable use of water resources.	The SA Framework should include objectives that consider effects upon water quality and resources.

International Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to DPD and SA	Implications for DPD	Implications for SA
(d) ensures the progressive reduction of pollution of groundwater and prevents its further pollution (e) contributes to mitigating the effects of floods and droughts	<ul style="list-style-type: none"> <li>▪ Prevention of deterioration from one status class to another</li> <li>▪ Reversal of any significant and sustained upward trends in pollutant concentrations and prevent or limit input of pollutants to groundwater</li> <li>▪ Achievement of water related objectives and standards for protected areas</li> </ul>		
<b>Drinking Water Directive (98/83/EC)</b>			
Sets standards for a range of drinking water quality parameters.	The Directive includes standards that constitute legal limits.	The DPD needs to recognise the effects of development on drinking water quality, and provide development and operational controls to prevent non-conformances.	The SA Framework should include objectives, indicators and targets that address water quality.
<b>Nitrates Directive (91/676/EEC)</b>			
<p>This Directive has the objective of:</p> <ul style="list-style-type: none"> <li>▪ Reducing water pollution caused or induced by nitrates from agricultural sources</li> <li>▪ Preventing further such pollution</li> </ul>	The Directive provides guidelines for monitoring nitrate levels for the purpose of identifying vulnerable zones.	The DPD should seek to protect water resources.	Blackpool is a rural Borough with many agricultural businesses. Therefore the SA Framework should include objectives that seek to protect environmental quality and promote enhancements with regard to nitrate levels resulting from agricultural practice.
<b>Directive on the Assessment and Management of Flood Risks (2007/60/EC)</b>			
<p>This Directive aims to reduce and manage the risks that floods pose to human health, the environment, cultural heritage and economic activity. It requires Member States to assess whether all watercourses and coastlines are at risk from flooding, to map the flood extent and assets and humans at risk in these areas, and to take adequate and coordinated measures to reduce this flood risk.</p> <p>The Directive shall be carried out in co-ordination with the WFD, most</p>	There are no specific targets or indicators of relevance.	The DPD should consider potential flood risk, and prevent development within floodplains.	The SA Framework should include objectives that promote the reduction and management of flood risk.



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Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to DPD and SA	Implications for DPD	Implications for SA
notably through flood risk management plans and river basin management plans, and also through co-ordination of the public participation procedures in the preparation of these plans.			
<b>UN Convention on Biological Diversity (1992)</b>			
<p>This was one of the main outcomes of the 1992 Rio Earth Summit. The key objectives of the Convention are:</p> <ul style="list-style-type: none"> <li>▪ The conservation of biological diversity</li> <li>▪ The sustainable use of its components</li> <li>▪ The fair and equitable sharing of the benefits arising from the use of genetic resources</li> </ul> <p>The achievement of the objectives in the Convention relies heavily upon the implementation of action at the national level.</p>	The Convention aims to halt the worldwide loss of animal and plant species and genetic resources and save and enhance biodiversity.	It is essential that the development of the DPD should consider biodiversity protection.	The SA Framework should include objectives relating to the protection (and enhancement where possible) of Blackpool's European, national and local designated sites.
<b>Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979)</b>			
<p>The principle objectives of the Convention are to conserve wild flora and fauna and their natural habitats, especially those species and habitats whose conservation requires the co-operation of several States, and to promote such co-operation. Particular emphasis is given to endangered and vulnerable species, including migratory species.</p> <p>In order to achieve this the Convention imposes legal obligations on contracting parties, protecting over 500 wild plant species and more than 1000 wild animal species.</p> <p>Each Contracting Party is obliged to:</p> <ul style="list-style-type: none"> <li>▪ Promote national policies for the conservation of wild flora, wild fauna and natural habitats, with particular attention to endangered and vulnerable species, especially endemic ones, and endangered habitats, in accordance with the provisions of this Convention</li> <li>▪ Have regard to the conservation of wild flora and fauna in its planning and development policies and in its measures against pollution</li> <li>▪ Promote education and disseminate general information on the need to conserve species of wild flora and fauna and their habitats</li> </ul>	There are no specific targets or indicators of relevance.	The DPD must take into account the habitats and species that have been identified under the Convention, and should include provision for the preservation, protection and improvement of the quality of the environment as appropriate.	The SA Framework should include objectives relating to the protection (and enhancement where possible) of Blackpool's European, national and local designated sites.
<b>Bonn Convention on the Conservation of Migratory Species of Wild Animals (1979)</b>			
The Convention is an intergovernmental treaty under the UN Environment Programme. The aim is for contracting parties to work together to conserve terrestrial, marine and avian migratory species and their habitats (on a global scale) by providing strict protection for endangered migratory species.	There are no specific targets or indicators of relevance.	The DPD must take into account the habitats and species that have been identified under this directive, and should include provision	The SA Framework should include objectives protecting biodiversity and also enhancement where possible.

International Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to DPD and SA	Implications for DPD	Implications for SA
<p>The overarching objectives set for the Parties are:</p> <ul style="list-style-type: none"> <li>▪ Promote, co-operate in and support research relating to migratory species</li> <li>▪ Endeavour to provide immediate protection for migratory species included in Appendix I</li> <li>▪ Endeavour to conclude Agreements covering the conservation and management of migratory species included in Appendix II</li> </ul>		for their protection, preservation and improvement.	
<b>Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (92/43/EEC)</b>			
Directive seeks to conserve natural habitats, and wild fauna and flora within the EU.	Member States are required to take measures to maintain or restore at favourable conservation status, natural habitats and species of Community importance. This includes Special Areas of Conservation and SPAs and it is usually accepted as also including Ramsar sites (European Sites). Plans that may adversely affect the integrity of European sites may be required to be subject to Appropriate Assessment under the Directive.	The DPD must take into account the habitats and species that have been identified under the Directive, and should include provision for the preservation, protection and improvement of the quality of the environment as appropriate.	The SA must recognise the conservation provisions of the Directive, and include objectives that address the protection of biodiversity. Habitats Regulations Assessment (HRA) screening should be completed in parallel to the SA.
<b>EU Biodiversity Strategy (1998)</b>			
The Strategy aims to anticipate, prevent and attack the causes of significant reduction or loss of biodiversity at the source, which will help both to reverse present trends in biodiversity decline and to place species and ecosystems, including agro-ecosystems, at a satisfactory conservation status, both within and beyond the territory of the EU.	There are no specific indicators or targets of relevance.	It is essential that the development of the DPD should consider biodiversity protection.	The SA Framework should include objectives relating to the protection (and enhancement where possible) of Blackpool's European, national and local designated sites. HRA screening should be completed in parallel to the SA.
<b>European Landscape Convention (2000)</b>			
The aims are to promote European landscape protection, management and planning, and to organise European co-operation on landscape issues. The Convention is part of the Council of Europe's work on natural and cultural heritage, spatial planning, environment and local self-government, and establishes the general legal principles which should serve as a basis for adopting national landscape policies and	There are no specific indicators or targets of relevance.	The DPD needs to consider the preservation and enhancement of the landscape (including views) as a significant	The SA Framework should include objectives that relate to landscape protection and enhancement.

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Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to DPD and SA	Implications for DPD	Implications for SA
establishing international co-operation in such matters. The UK is a signatory to this Convention and is committed to its principles.		part of Blackpool	
<b>Waste Framework Directive (2008/98/EC)</b>			
This replaces the old Waste Framework Directive (2006/12/EC). The aims of this Directive are: <ul style="list-style-type: none"> <li>To provide a comprehensive and consolidated approach to the definition and management of waste.</li> <li>To shift from thinking of waste as an unwanted burden to a valued resource and make Europe a recycling society.</li> <li>To ensure waste prevention is the first priority of waste management.</li> <li>To provide environmental criteria for certain waste streams, to establish when a waste ceases to be a waste (rather than significantly amending the definition of waste).</li> </ul>	There are no specific targets or indicators of relevance.	The DPD should seek to promote the key objectives of prevention, recycling and processing of waste, conversion of waste to usable materials, and energy recovery.	The SA needs to incorporate objectives, indicators and targets that address waste issues, e.g. minimisation and re-use etc.
<b>Directive on the Landfill of Waste (99/31/EC)</b>			
The Directive is intended, by way of stringent operational and technical requirements on the waste and landfills, to prevent or reduce the adverse effects of the landfill of waste on the environment, in particular on surface water, groundwater, soil, air and human health.	The Directive establishes guidelines and targets for the quantities or biodegradable waste being sent to landfill. The key targets are set to be achieved within set timeframes from the start year. Some of these are now out of date and are therefore not included. With 2001 as the start year: <ul style="list-style-type: none"> <li>By approximately 2016, biodegradable municipal waste going to landfills must be reduced to 35%.</li> </ul>	Lancashire County Council is responsible for waste and landfills within Blackpool, and where appropriate the DPD must comply with this Directive, other international legislation, national policy and Lancashire's Minerals and Waste Local Development Framework.	The SA Framework should incorporate principles of waste management in conjunction with Lancashire County Council – the competent waste authority.
<b>EU Birds Directive 2009/147/EC</b>			
The directive recognises that habitat loss and degradation are the most serious threats to the conservation of wild birds. The Directive places great emphasis on the protection of habitats for endangered as well as migratory species (listed in Annex I), especially through the establishment of a coherent network of Special Protection Areas (SPAs) comprising all the most suitable territories for these species.	There are no specific targets or indicators of relevance.	The development of the DPD must consider the preservation / enhancement of biodiversity resources including the protection of bird species.	The SA Framework should include sustainability objectives, indicators and targets for the preservation /enhancement of biodiversity resources. HRA screening which

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Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to DPD and SA	Implications for DPD	Implications for SA
			has been undertaken in parallel to the SA has assessed the potential for significant effects on European sites within Blackpool.
Bathing Water Directive 2006/7/EC	The Directive establishes guidelines and targets for bathing water quality.	The development of the DPD must consider there are no undue impacts on bathing water quality	The SA needs to incorporate objectives, indicators and targets that address bathing water quality.

## Summary of National Plans

National Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for DPD	Implications for SA
<b>Planning Act 2008</b>			
<p>The Act created amendments to the functioning of the planning system, following recommendations from the Barker Review first proposed in the 2007 White Paper: Planning for a Sustainable Future. The two principal changes are:</p> <ul style="list-style-type: none"> <li>▪ The establishment of an Infrastructure Planning Commission to make decisions on nationally significant infrastructure projects.</li> <li>▪ Creation of the Community Infrastructure Levy, a charge to be collected from developers by local authorities for the provision of local and sub-regional infrastructure.</li> </ul>	There are no specific targets or indicators of relevance.	The preparation of the DPD should consider the recommended actions in this document.	The SA should consider the measures included within the Act that relate to sustainable development, including: having regard to the desirability of achieving good design.
<b>World Class Places: The Government's Strategy for Improving Quality of Place (2009)</b>			
<p>The Strategy identifies the benefits of creating well-designed places, including elements of spatial planning, urban design, architecture, green infrastructure and community involvement. It seeks to promote the consideration of place at all levels of planning. An Action Plan accompanying the Strategy sets out the following seven broad objectives</p> <ol style="list-style-type: none"> <li>1: Strengthen leadership on quality of place at the national and regional level</li> <li>2: Encourage local civic leaders and local government to prioritise quality of place</li> <li>3: Ensure relevant government policy, guidance and standards consistently promote quality of place and are user-friendly</li> <li>4: Put the public and community at the centre of place-shaping</li> <li>5: Ensure all development for which central government is directly responsible is built to high design and sustainability standards and promotes quality of place</li> <li>6: Encourage higher standards of market-led development</li> <li>7: Strengthen quality of place skills, knowledge and capacity</li> </ol>	<p>The majority of actions reflect how the Government will take forward the strategy and use it in the creation of new guidance and to direct its interactions with relevant agencies. However, of particular relevance are:</p> <p>2.3: Working with local authorities to achieve high quality development</p> <p>2.5: Establishing an award scheme for high quality places</p> <p>4.1: Encouraging public involvement in shaping the vision for their area and the design of individual schemes</p> <p>4.2: Ensuring the citizens and service users are engaged in the design and development of public buildings</p> <p>4.3: Encouraging community involvement in ownership and management of the public realm and community facilities</p> <p>4.4: Promoting public engagement in creating new homes and neighbourhoods</p> <p>6.1: Encouraging local authorities to set clear quality of place ambitions in their LDFs</p> <p>7.1: Strengthening advisory support on design quality for local authorities, the wider public sector and developers</p> <p>7.2: Encouraging local authorities to share planning, design, conservation and related expertise</p>	The DPD should seek to reinforce and promote a sense of place, particularly in key regeneration areas. High standards of design and public consultation should be encouraged as part of new development.	The SA Framework should recognise the importance of developing a high quality built environment and promoting high levels of community involvement.
<b>The Countryside in and Around Towns: A vision for connecting town and country in the pursuit of sustainable development (2005)</b>			
This document was jointly published by the Countryside Agency and Groundwork, in 2005.	There are no specific targets or indicators of relevance.	The DPD needs to complement the aims of the strategy and seek to	The SA Framework should include objectives, indicators

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Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for DPD	Implications for SA
It presents a new vision for the countryside in and around England's towns and cities. The vision is to reduce the pressures that urban life places on the local and global environment - 'the <i>need to ensure a high quality of life for all while at the same time reducing our collective impact on the resources we share</i> '.		develop sustainable communities.	and targets that seek to promote sustainable communities and protect both the urban and rural environment. As part of the assessment the needs of the rural settlements in the Borough and their accessibility to services must be considered.
<b>Sustainable Communities, Settled Homes, Changing Lives – A Strategy for Tackling Homelessness (ODPM) (2005)</b>			
The key actions of the strategy for addressing homelessness are: <ul style="list-style-type: none"> <li>Preventing homelessness</li> <li>Providing support for vulnerable people</li> <li>Tackling the wider causes and symptoms of homelessness</li> <li>Helping more people move away from rough sleeping</li> <li>Providing more settled homes</li> </ul> For each of the above points a series of actions are identified.	Key target: <ul style="list-style-type: none"> <li>Halve the number of households living in temporary accommodation by 2010</li> </ul>	The DPD needs to recognise the causes of homelessness and should seek to reduce the number of people sleeping rough.	The SA Framework should include objectives that address housing issues including homelessness. In particular, affordable housing, which is an issue within Blackpool.
<b>Climate Change Act (2008)</b>			
The Act commits the UK to action in mitigating the impacts of climate change. It has two key aims: <ul style="list-style-type: none"> <li>To improve carbon management, helping the transition towards a low-carbon economy</li> <li>To demonstrate UK leadership internationally, signalling a commitment to take our share of responsibility for reducing global emissions in the context of developing negotiations on a post-2012 global agreement at Copenhagen in December 2009 [and beyond].</li> </ul>	Relevant commitments within the Act are: <ul style="list-style-type: none"> <li>The creation of a legally binding target of at least an 80% cut in greenhouse gas emissions by 2050, to be achieved through action in the UK and abroad (against 1990 levels). Also a reduction in emissions of at least 34% by 2020.</li> <li>A carbon budgeting system which caps emissions over 5-year periods.</li> <li>The creation of the Committee on Climate Change - to advise the Government on the level of carbon budgets and on where cost-effective savings can be made.</li> <li>The inclusion of International aviation and shipping emissions in the Act or an explanation to Parliament why not - by 31 December 2012.</li> <li>Further measures to reduce emissions, including: powers to introduce domestic emissions trading schemes more quickly and easily through secondary</li> </ul>	The DPD should ensure that it encourages a reduction in CO <sub>2</sub> emissions whilst promoting sustainable economic growth.	The SA Framework should include objectives that address climate change issues including flooding and the need to reduce greenhouse gas emissions.

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Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for DPD	Implications for SA
	<p>legislation; measures on biofuels; powers to introduce pilot financial incentive schemes in England for household waste; powers to require a minimum charge for single-use carrier bags (excluding Scotland).</p> <ul style="list-style-type: none"> <li>▪ New powers to support the creation of a Community Energy Savings Programme.</li> </ul>		
<b>Stern Review of the Economics of Climate Change (2006)</b>			
<p>The review examines the evidence on the economic impacts of climate change and explores the economics of stabilising greenhouse gases in the atmosphere. The second part of the review considers the complex policy challenges involved in managing the transition to a low-carbon economy and in ensuring that societies are able to adapt to the consequences of climate change.</p> <p>The document clearly identifies that adaptation is the only available response for impacts that will occur over the next few decades.</p>	There are no specific targets or indicators of relevance.	The DPD should ensure that it encourages the reduction in CO <sub>2</sub> emissions whilst promoting sustainable economic growth.	The SA Framework should include an objective relating to reducing greenhouse gas emissions as well as considering issues such as flood risk and the vulnerability to climate change.
<b>UK Carbon Plan (2011)</b>			
<p>The Carbon Plan sets out the Government's plans for achieving the emissions reductions committed to in the first four carbon budgets, on a pathway consistent with meeting the UK's 2050 target. The publication brings together the Government's strategy to curb greenhouse gas emissions and deliver climate change targets.</p>	<p>The Carbon Plan includes the following targets:</p> <ul style="list-style-type: none"> <li>▪ Commitment to reduce carbon emissions by at least 80% by 2050.</li> </ul>	It should be ensured that reducing carbon emissions is a key theme throughout the DPD.	The SA Framework should include objectives that complement the priorities of this Plan.
<b>Climate change and biodiversity adaptation: the role of the spatial planning system – a Natural England commissioned report (2009)</b>			
<p>The report examines ways in which the land use planning system can help biodiversity adapt to climate change. Strategies are identified that enable LDFs to deliver against the Department for Food, Environment and Rural Affairs' (Defra) 12 core adaptation goals:</p> <ol style="list-style-type: none"> <li>1. Conserve existing biodiversity <ol style="list-style-type: none"> <li>1a Conserve protected areas and other high quality habitats</li> <li>1b Conserve range and ecological variability of habitats and species</li> </ol> </li> <li>2 Reduce sources of harm not linked to climate</li> <li>3 Develop ecologically resilient and varied landscapes <ol style="list-style-type: none"> <li>3a Conserve and enhance local variation within sites and habitats</li> <li>3b Make space for the natural development of rivers and coasts</li> </ol> </li> <li>4 Establish ecological networks through habitat protection, restoration and creation</li> <li>5 Make sound decisions based on analysis</li> </ol>	There are no specific targets or indicators of relevance.	Development of the DPD should include recommendations from this report. Biodiversity assets within Blackpool should be protected from inappropriate development and i.e. use of buffer zones around sensitive sites.	The SA should refer to specific guidance in the document for using SA to improve the ability of biodiversity to adapt to climate change.

National Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for DPD	Implications for SA
5a Thoroughly analyse causes of change 5b Respond to changing conservation priorities 6 Integrate adaptation and mitigation measures into conservation management, planning and practice			
<b>Planning for Climate Change – Guidance and Model Policies for Local Authorities (2010)</b>			
<p>The document has been produced by the Planning and Climate Change Coalition, a group of organisations seeking to ensure that the planning system responds effectively to the climate challenge.</p> <p>The guide is designed to provide clarity and guidance to local authorities and Local Enterprise Partnerships on how best to plan for climate change, both in terms of reducing CO<sub>2</sub> emissions, and adapting to future climatic conditions.</p> <p>Guidance is provided on developing both strategic and development control policies.</p>	There are no specific targets or indicators of relevance, other than to support local authorities in mitigating and adapting to climate change.	This guidance should be followed when developing the DPD and climate change issues should be addressed.	The SA should examine the likely effectiveness of the DPD in mitigating and adapting to climate change. Such judgements should be made with reference to the guidance.
<b>Energy Act 2011</b>			
<p>The Act sets out new legislation to:</p> <ul style="list-style-type: none"> <li>▪ Reflect the availability of new technologies (such as CCS and emerging renewable technologies)</li> <li>▪ Correspond with our changing requirements for security of supply infrastructure (such as offshore gas storage)</li> <li>▪ Ensure adequate protection for the environment and the tax payer as our energy market changes.</li> </ul>	There are no specific targets or indicators of relevance.	The DPD should ensure that it seeks to encourage the reduction in CO <sub>2</sub> emissions whilst promoting sustainable economic growth.	The SA Framework should include an objective relating to minimising greenhouse gas emissions.
<b>Delivering a Sustainable Transport System (2008)</b>			
<p>The document explains how the strategic aims set out in 'Towards a Sustainable Transport System' (2007) will be translated into policy and practical actions. It takes on recommendations contained in the Eddington transport study and the Stern Review. The five goals are:</p> <ul style="list-style-type: none"> <li>▪ To support national economic competitiveness and growth, by delivering reliable and efficient transport networks;</li> <li>▪ To reduce transport's emissions of CO<sub>2</sub> and other greenhouse gases, with the desired outcome of tackling climate change;</li> <li>▪ To contribute to better safety, security and health and longer life expectancy by reducing the risk of death, injury or illness arising from transport, and by promoting travel modes that are beneficial to health;</li> <li>▪ To promote greater equality of opportunity for all citizens, with the</li> </ul>	The document does not contain specific targets or indicators, but rather sets out broad strategic priorities at a national level. Nonetheless, the goals provide a framework for local as well as national action.	The DPD should recognise the importance of safe, reliable and efficient transport systems to economic and social wellbeing. The sustainability impacts of transport should also be fully understood.	The SA Framework should ensure inclusion of objectives that promote sustainable transport and consider the location of new development in relation to sustainable transport links.



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Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for DPD	Implications for SA
<p>desired outcome of achieving a fairer society; and</p> <ul style="list-style-type: none"> <li>To improve quality of life for transport users and non-transport users, and to promote a healthy natural environment.</li> </ul>			
The Future of Transport White Paper – A Network for 2030 (2004)			
<p>This Paper sets out the vision for a modern, efficient and sustainable transport system for the next 30 years, with a funding commitment until 2015.</p> <p>The aim is for a transport network that can meet the challenges of a growing economy and the increasing demand for travel, but that can also achieve environmental objectives. This means coherent networks with:</p> <ul style="list-style-type: none"> <li>The road network providing a more reliable and freer-flowing service for both personal travel and freight, with people able to make informed choices about how and when they travel</li> <li>The rail network providing a fast, reliable and efficient service, particularly for interurban journeys and commuting into large urban areas</li> <li>Reliable, flexible, convenient bus services tailored to local needs</li> <li>Making walking and cycling a real alternative for local trips</li> <li>Improving international and domestic links from ports and airports</li> </ul> <p>The strategy is built around three key themes:</p> <ul style="list-style-type: none"> <li>Sustained investment over the long term</li> <li>Improvements in transport management</li> <li>Planning ahead sustained</li> </ul> <p>Underlining these themes is the need to balance travel demand with improving quality of life. This means seeking solutions that meet long term economic, social and environmental goals.</p>	<p>The document indicates a number of Public Service Agreement objectives. Those of relevance include;</p> <ul style="list-style-type: none"> <li>Reduce greenhouse gas emissions to 12.5% below 1990 levels in line with our Kyoto commitment and move towards a 20% reduction in CO<sub>2</sub> emissions below 1990 levels by 2010, through measures including energy efficiency and renewables.</li> <li>Improve air quality by meeting the Air Quality Strategy targets for CO, lead, NO<sub>2</sub>, PM<sub>10</sub>, SO<sub>2</sub>, benzene and 1, 3 butadiene.</li> </ul>	<p>The DPD should address the need for an integrated and sustainable transport network.</p>	<p>The SA Framework should contain objectives that support an efficient and sustainable transport system, and also cover issues relating to improving air quality by reducing harmful emissions.</p>
Low Carbon Transport: A Greener Future - A Carbon Reduction Strategy for Transport (2009)			
<p>The Strategy sets out how the transport sector will meet its emissions reduction obligations and contribute to the Government's overall policy on climate change as set out in the Climate Change Act 2008.</p>	<p>The Strategy does not contain its own targets; rather it sets out how those committed to elsewhere, notably in the Climate Change Act 2008, will be met by the transport sector and what actions the Government will take to see they are met.</p>	<p>The DPD should promote low-carbon transport options for passengers and freight. This should require the promotion of new and emerging technology and a modal shift in transport choices.</p>	<p>The SA should seek the promotion of low-carbon forms of transport.</p>
Wildlife and Countryside Act (1981) (as amended)			

National Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for DPD	Implications for SA
<p>The Act still forms the basis of conservation legislation in Great Britain, although it has been much modified.</p> <p>Schedules 5 and 8 of the Act detail lists of legally protected wild animals and plants respectively. These are updated every five years.</p>	There are no specific targets or indicators of relevance.	The DPD must ensure that the requirements of the Act are complied with and that species and habitats are protected.	The SA Framework should include objectives relating to the protection and enhancement of biodiversity resources.
<b>The Conservation of Habitats and Species Regulations (2010)</b>			
<p>These Regulations make provision for the purpose of implementing, for Great Britain, Council Directive 92/43/EEC[8] on the conservation of natural habitats and of wild fauna and flora.</p> <p>They replace and update the Conservation (Natural Habitats, &amp;c.) Regulations 1994 (as amended) in England and Wales (and to a limited degree, Scotland - as regards reserved matters).</p>	There are no specific targets or indicators of relevance.	It is essential that the development of the DPD considers biodiversity protection.	The SA Framework should include objectives relating to the protection and enhancement of biodiversity resources.
<b>The Countryside and Rights of Way (CRoW) Act (2000)</b>			
<p>The purpose of the Act is to create a new statutory right of access on foot to certain types of open land, to modernise the public rights of way system, to strengthen nature conservation legislation, and to facilitate better management of Areas of Outstanding Natural Beauty (AONBs).</p>	There are no specific targets or indicators of relevance.	It is essential that the development of the DPD should consider access to rights of way and nature conservation legislation.	The SA Framework should include objectives relating to access to rights of way and nature conservation legislation.
<b>The Natural Environment and Rural Communities Act (2006)</b>			
<p>The act created Natural England and the Commission for Rural Communities and, amongst other measures, it extended the biodiversity duty set out in the CRoW Act to public bodies and statutory undertakers to ensure due regard to the conservation of biodiversity.</p> <p>The Duty is set out in Section 40 of the Act, and states that every public authority must, in exercising its functions, have regard to the purpose of conserving biodiversity.</p> <p>The aim of the biodiversity duty is to raise the profile of biodiversity in England and Wales, so that the conservation of biodiversity becomes properly embedded in all relevant policies and decisions made by public authorities.</p>	There are no specific targets or indicators of relevance.	It is essential that the development of the DPD considers biodiversity protection.	<p>The SA Framework should include objectives relating to the protection and enhancement of biodiversity resources in Blackpool, including European, national and locally designated sites, and protected species.</p> <p>A HRA screening report will be undertaken in parallel to the SA process which guard against inappropriate development within Blackpool.</p>

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Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for DPD	Implications for SA
<b>The Guidance for Local Authorities on Implementing the Biodiversity Duty (2007)</b>			
This guidance was issued by Defra and WAG to assist local authorities in fulfilling their Biodiversity Duty.	<p>The guidance references a biodiversity indicator to measure local authority performance, which is based on four sub-indicators relating to:</p> <ul style="list-style-type: none"> <li>▪ The management of local authority landholdings (e.g. % of landholdings managed to a plan which seeks to maximise the sites' biodiversity potential).</li> <li>▪ The condition of local authority managed Sites of Special Scientific Interest (SSSIs) (e.g. % of SSSI in 'favourable' or 'unfavourable recovering' condition).</li> <li>▪ The provision of accessible greenspace.</li> <li>▪ The effect of development control decisions on designated sites (e.g. change in designated sites as a result of planning permissions).</li> </ul>	It is essential that the development of the DPD considers the provisions of the biodiversity duty.	The SA Framework should include objectives relating to the protection and enhancement of biodiversity resources. Targets should also form part of the SA monitoring-framework.
<b>Conserving Biodiversity – The UK Approach (2007)</b>			
<p>The document sets out an approach to biodiversity conservation that is designed to meet the commitment to halt the loss of biodiversity by 2010 but also to guide action into the second decade of the 21<sup>st</sup> Century.</p> <p>The statement emphasises an ecosystem approach. There is a close relationship between ecosystems and human well-being and there is a need to take action to reverse ecosystem degradation by addressing the key drivers and valuing ecosystem services. There is a need to maintain, create and restore functional combinations of habitats.</p> <p>The shared priorities for action are:</p> <ul style="list-style-type: none"> <li>▪ Protecting the best sites for wildlife</li> <li>▪ Targeting action on priority species and habitats</li> <li>▪ Embedding proper consideration of biodiversity and ecosystem services in all relevant sectors of policy and decision-making.</li> <li>▪ Engaging people and encouraging behaviour change</li> <li>▪ Developing and interpreting the evidence base</li> <li>▪ Ensuring that the UK plays a proactive role in influencing the development of Multilateral Environmental Agreements and contributes fully to their domestic delivery.</li> </ul>	<p>In June 2007 the UK Biodiversity Partnership published 18 indicators that can be used to monitor biodiversity progress across the UK. They will be used as part of a wider evidence base to determine whether the target to halt biodiversity loss is being achieved. Some of the relevant indicators include:</p> <ul style="list-style-type: none"> <li>▪ Trends in populations of selected species of birds and butterflies</li> <li>▪ Protected areas</li> <li>▪ Sustainable woodland management</li> <li>▪ Area of agri-environment land</li> <li>▪ Sustainable fisheries</li> <li>▪ Ecological impact of air pollution</li> <li>▪ Invasive species</li> <li>▪ Habitat connectivity</li> <li>▪ River quality</li> </ul>	It is essential that the development of the DPD considers biodiversity protection.	The SA Framework should include objectives relating to the protection of biodiversity resources.
<b>Working with the Grain of Nature: a Biodiversity Strategy for England (2002)</b>			
The Strategy seeks to ensure biodiversity considerations become embedded in all main sectors of public policy and sets out a	A key Defra objective is: to protect and improve the rural, urban, marine and global environment and lead on the	The DPD should support the vision of	The SA Framework should include

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<p>programme to make the changes necessary to conserve, enhance and work with the grain of nature and ecosystems rather than against them.</p> <p>The Strategy sets out a series of actions that will be taken by the Government and its partners to make biodiversity a fundamental consideration in:</p> <ul style="list-style-type: none"> <li>▪ Agriculture: encouraging the management of farming and agricultural land so as to conserve and enhance biodiversity as part of the Government's Sustainable Food and Farming Strategy.</li> <li>▪ Water: aiming for a whole catchment approach to the wise, sustainable use of water and wetlands.</li> <li>▪ Woodland: managing and extending woodland so as to promote enhanced biodiversity and quality of life.</li> <li>▪ Marine and coastal management: so as to achieve the sustainable use and management of our coasts and seas using natural processes and the ecosystem-based approach.</li> <li>▪ Urban areas: where biodiversity needs to become a part of the development of policy on sustainable communities and urban green space and the built environment.</li> </ul>	<p>integration of these with other policies across Government and internationally.</p> <p>Under this objective, key targets are:</p> <ul style="list-style-type: none"> <li>▪ To care for natural heritage, make the countryside attractive and enjoyable for all and preserve biological diversity by</li> <li>▪ Reversing the long-term decline in the number of farmland birds by 2020</li> <li>▪ Bringing into favourable condition by 2010 95% of all nationally important wildlife sites</li> </ul> <p>Of the Government's Quality of Life Counts indicators, those that are particularly important for biodiversity are:</p> <ul style="list-style-type: none"> <li>▪ The populations of wild birds</li> <li>▪ The condition of SSSIs</li> <li>▪ Progress with BAPs</li> <li>▪ Area of land under agri-environment agreement</li> <li>▪ Biological quality of rivers</li> <li>▪ Fish stocks around the UK fished within safe limits</li> </ul>	<p>emphasising biodiversity.</p>	<p>sustainability objectives, indicators and targets that address biodiversity.</p>
The UK Post-2010 Biodiversity Framework (2012)			
<p>The UK Post-2010 Biodiversity Framework supersedes the 1994 UK Biodiversity Action Plan.</p> <p>The Framework covers the period from 2011 to 2020, and was developed in response to two main drivers: the Convention on Biological Diversity's (CBD's) Strategic Plan for Biodiversity 2011-2020 and its 5 strategic goals and 20 'Aichi Biodiversity Targets', published in October 2010; and the EU Biodiversity Strategy (EUBS), released in May 2011.</p> <p>The Framework shows how the work of the four UK countries joins up with work at a UK level to achieve the 'Aichi Biodiversity Targets' and the aims of the EU biodiversity strategy. It identifies the activities required to complement the country biodiversity strategies, and where work in the country strategies contributes to international obligations. In total, 23 areas of work have been identified where all the countries have agreed that they want to contribute to, and benefit from, a continued UK focus, and an Implementation Plan was published in November 2013. Reporting on progress with the Implementation Plan is also undertaken.</p> <p>Most work which was previously carried out under the UK Biodiversity Action Plan (UK BAP) is now focussed at the country level (England,</p>	<p>The framework identifies the following strategic goals and the key activities required to achieve these goals at a UK scale:</p> <ul style="list-style-type: none"> <li>▪ Strategic Goal A: Address the underlying causes of biodiversity loss by mainstreaming biodiversity across government and society.</li> <li>▪ Strategic Goal B: Reduce the direct pressures on biodiversity and promote sustainable use.</li> <li>▪ Strategic Goal C: To improve the status of biodiversity by safeguarding ecosystems, species and genetic diversity.</li> <li>▪ Strategic Goal D: Enhance the benefits to all from biodiversity and ecosystems</li> <li>▪ Strategic Goal E: Enhance implementation through participatory planning, knowledge management and capacity building.</li> </ul>	<p>It is essential that the development of the DPD considers the protection of biodiversity.</p>	<p>The SA Framework should include objectives relating to the protection of biodiversity resources.</p>

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Northern Ireland, Scotland, and Wales).			
Biodiversity by Design: A Guide for Sustainable Communities (Town and Country Planning Association) (2004)			
The aim of the guide is to provide guidance on how to maximise the opportunities for biodiversity in the planning and design of sustainable communities. The guidance is designed to apply at a variety of scales from whole sub-region growth points, to neighbourhood schemes.	This is a guidance document and therefore does not set targets or identify indicators	The DPD should recognise the multi-functional nature of open space. The DPD should seek to protect and enhance biodiversity resources and open space.	The SA Framework should seek to protect Blackpool's European, national and locally designated sites along with areas of open space.
Biodiversity Indicators in Your Pocket (2010) Defra			
These indicators show changes in aspects of biodiversity such as the population size of important species or the area of land managed for wildlife. They provide part of the evidence to assess whether the targets set out in the following column have been achieved.	<p>The UK Government committed to two important international targets to protect biodiversity:</p> <ol style="list-style-type: none"> <li>1. In 2001, European Union Heads of State or Government agreed that biodiversity decline should be halted, with the aim of reaching this objective by 2010.</li> <li>2. In 2002, Heads of State at the United Nations World Summit on Sustainable Development committed themselves to achieve, by 2010, a significant reduction of the current rate of biodiversity loss at the global, regional and national level, as a contribution to poverty alleviation and to the benefit of all life on Earth.</li> </ol> <p>There are eighteen UK biodiversity indicators grouped under six focal areas aligned to those used by the Convention on Biological Diversity:</p> <ol style="list-style-type: none"> <li>1. Status and trends in components of biodiversity</li> <li>2. Sustainable use</li> <li>3. Threats to biodiversity</li> <li>4. Ecosystem integrity and ecosystem goods and services</li> <li>5. Status of resource transfers and use</li> <li>6. Public awareness and participation</li> </ol>	The DPD should include indicators relating to biodiversity in order to monitor progress.	The SA Framework should include objectives relating to biodiversity and the quality of the natural environment. The proposed Monitoring Framework should also include biodiversity indicators to monitor effects of the Core Strategy on biodiversity resources.
A Strategy for England's Trees, Woodlands and Forests (2007)			
The strategy strives to achieve sustainable forest management and has five aims for Government intervention in trees, woods and forests over the following 10-15 years: <ul style="list-style-type: none"> <li>▪ To provide a resource of trees, woods and forests where they can contribute most in terms of environmental, economic and social</li> </ul>	There are no specific targets or indicators of relevance.	It is essential that the development of the DPD considers biodiversity protection.	The SA Framework should include objectives relating to the protection of biodiversity resources, which includes areas of

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<p>benefits now and in the future.</p> <ul style="list-style-type: none"> <li>▪ To ensure that existing and newly-planted trees, woods and forests are resilient to the impacts of climate change and also contribute to the way in which biodiversity and natural resources adjust to climate change.</li> <li>▪ To protect and enhance the environmental resources of water, soil, air, biodiversity and landscapes and the cultural and amenity values of trees and woodland.</li> <li>▪ To increase the contribution that trees, woods and forests make to the quality of life for those living, working and visiting England.</li> <li>▪ To improve the competitiveness of woodland businesses and to promote new or improved markets for sustainable woodland products.</li> </ul>			woodland, particularly ancient woodland.
<b>Landscape Character Assessment Guidance for England and Scotland (2002)</b>			
Produced jointly by the former Countryside Agency and Scottish Natural Heritage, this document comprises the accepted national guidance on the practice and procedure of landscape character assessment.	There are no specific targets or indicators of relevance.	The DPD should recognise the importance of protecting and enhancing landscape character, particularly within the Forest of Bowland Area of Outstanding National Beauty (AONB).	The SA should include an objective related to landscape and townscape character.
<b>Open Space Strategies: Best Practice Guidance (CABE and the Greater London Authority, 2009)</b>			
This document offers clear, practical guidance to local authorities and their stakeholders on how to prepare an open space strategy.	There are no specific targets or indicators of relevance.	The DPD should recognise the multi-functional benefits of open space.	The SA should consider the potential for impacts on open spaces and opportunities for enhancements.
<b>The Geological Conservation Review (GCR) (ongoing)</b>			
The GCR is designed to identify sites of national and international importance needed to show all the key scientific elements of the Earth heritage of Britain. They display sediments, rocks, fossils, and features of the landscape that make a special contribution to our understanding and appreciation of Earth science and the geological history of Britain	There are no specific targets or indicators of relevance.	The DPD should recognise the status of GCR sites in Blackpool and aim to protect this and other geodiversity sites (i.e. Blackpool's 25	The SA should consider potential impacts on geodiversity. In addition, the SA should consider opportunities to improve understanding of

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		Regionally Important Geological and Geomorphological Sites (RIGS).	important geological assets within the Borough.
<b>Safeguarding our Soils: A Strategy for England (Defra, 2009)</b>			
<p>Vision: By 2030, all England's soils will be managed sustainably and degradation threats tackled successfully. This will improve the quality of England's soils and safeguard their ability to provide essential services for future generations.</p> <p>The Strategy sets out how Government intends to improve the management of soil to manage threats to its quality and integrity.</p>	There are no specific targets or indicators of relevance.	The DPD should include measures to ensure that soils are protected in line with the Strategy's aims. In addition the protection of valuable soil resources should be promoted within the DPD.	The assessment should consider the extent to which soils may be impacted by proposals supported within the DPD.
<b>Natural England's Green Infrastructure Guidance (2009)</b>			
The guidance outlines the benefits of developing multi-functional green infrastructure. It provides advice to local authorities on how to deliver green infrastructure improvements through the planning system, including reference to LDFs.	There are no specific targets or indicators of relevance.	The DPD should protect existing green infrastructure and promote new multi-functional green spaces. Guidance should be followed where possible.	The assessment should consider the impact of DPD on the quality and quantity of green infrastructure and the extent to which the guidance has been followed.
<b>Accessible Natural Green Space Standards in Towns and Cities: A Review and Toolkit for their Implementation (2003) and Nature Nearby: Accessible Green Space Guidance (2010)</b>			
These publications by Natural England explain and give guidance on the concept of Accessible Natural Green Space Standards (ANGSt). The 2010 report provides practical advice to planning authorities on meeting the standards within new and existing developments.	<p>ANGSt recommends that everyone, wherever they live, should have an accessible natural greenspace:</p> <ul style="list-style-type: none"> <li>▪ of at least 2ha in size, no more than 300m (5 minutes' walk) from home;</li> <li>▪ at least one accessible 20ha site within 2km of home;</li> <li>▪ one accessible 100ha site within 5km of home; and</li> <li>▪ one accessible 500ha site within 10km of home; plus</li> <li>▪ a minimum of 1ha of statutory Local Nature Reserves per thousand population.</li> </ul>	The DPD should attempt to ensure that the standards are met within the Borough.	The SA Framework should contain an objective relating to the provision of green space.
<b>Historic Environment: A Force For the Future (2001)</b>			
<p>The Government vision is:</p> <ul style="list-style-type: none"> <li>▪ Public interest in the historic environment is matched by effective partnerships and the development of a sound base from which to</li> </ul>	There are no specific indicators or targets of relevance.	The DPD will need to take on board the issues and themes that have been identified in	The SA Framework should include objectives that relate to the protection and

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<p>develop policies.</p> <ul style="list-style-type: none"> <li>Maximising the full potential of the historic environment as a learning resource.</li> <li>Ensuring the historic environment is accessible to everybody and is seen as a something with which the whole of society can identify and engage with.</li> <li>The historic environment is protected and sustained for the benefit of our own and future generations.</li> <li>The historic environment is an economic asset that is well harnessed.</li> </ul> <p>The document sets out actions to protect and sustain heritage for future generations.</p>		<p>the document. This would ensure heritage assets within the Borough are protected and sensitive areas are protected (i.e. Conservation Areas). In addition, the Local Plan Part 2 should include opportunities to promote understanding of local heritage within Blackpool.</p>	<p>enhancement of the historic environment.</p>
<b>The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)</b>			
<p>The Strategy sets out air quality objectives and policy options to further improve air quality in the UK to deliver environmental, health and social benefits.</p> <p>It examines the costs and benefits of air quality improvement proposals, the impact of exceedences of the strategy's air quality objectives, the effect on ecosystems and the qualitative impacts.</p>	<p>The Strategy sets objectives and targets for each air quality pollutant, e.g. to achieve and maintain <math>40\mu\text{g}/\text{m}^3</math> of annual average <math>\text{NO}_2</math>.</p>	<p>The DPD should consider the maintenance of good air quality and the measures that can be taken to improve it.</p>	<p>The SA Framework should include objectives that address the protection of air quality.</p>
<b>Water Resources Strategy for England and Wales (2009)</b>			
<p>This document forms the EA's strategy for water resource management for the next 25 years.</p> <p>The focus of the strategy is on understanding the present state of water resources and planning for the management of water resources to prevent long-term environmental damage and degradation. The strategy highlights where water abstractions are unsustainable and where further water is needed. The issue of climate change and its impact upon our water resources is also considered.</p> <p>30 action points are identified to deliver the strategy, which include developing leakage control, encouraging good practice when using water and promoting the value of water.</p>	<p>There are no specific targets or indicators of relevance.</p>	<p>The DPD needs to consider the protection and enhancement of water resources.</p>	<p>The SA Framework should include objectives that promote the protection of the water environment.</p>
<b>Future Water: The Government's Water Strategy for England (2008)</b>			
<p>Defra's vision for the state of the water environment in 2030 is for:</p> <ul style="list-style-type: none"> <li>An improved quality of the water environment and the ecology which it supports, and continued high levels of drinking water quality;</li> <li>Sustainably managed risks from flooding and coastal erosion, with greater understanding and more effective management of surface</li> </ul>	<p>The Strategy contains few quantitative targets. It sets out broad ambitions for improvements in the areas of water demand, supply, quality, surface water drainage, flooding, greenhouse gas emissions, water charging and the regulatory framework.</p> <p>One headline target is to reduce per capita consumption of</p>	<p>The DPD should help to support the aims of this Strategy through requiring high levels of protection for the water environment and</p>	<p>The SA Framework should contain objectives related to water resources, flooding and climate change.</p>



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<p>water;</p> <ul style="list-style-type: none"> <li>▪ Sustainable use of water resources, and implemented fair, affordable and cost reflective water charges;</li> <li>▪ Reduced greenhouse gas emissions; and</li> <li>▪ An embedded continuous adaptation to climate change and other pressures across the water industry and water users.</li> </ul>	<p>water to an average of 130 litres per person per day by 2030, or possibly even 120 litres per person per day depending on new technological developments and innovation.</p>	<p>innovative new development to reduce water consumption.</p>	
<b>Flood and Water Management Act (2010)</b>			
<p>The Act will provide better, more comprehensive management of coastal erosion and flood risk for people, homes and businesses. It also contains financial provisions related to the water industry.</p> <p>The Act will give the EA an overview of all flood and coastal erosion risk management and unitary and county councils the lead in managing the risk of local floods. It will also enable better management of water resources and quality, and will help to manage and respond to severe weather events such as flood and drought.</p>	<p>There are no specific targets or indicators of relevance.</p>	<p>The DPD should consider flood risk issues and seek to avoid siting new development in the floodplain and ensure the sustainable use of water resources.</p>	<p>The SA Framework should include objectives, targets and indicators that address flooding risk and the need to manage runoff effectively.</p>
<b>Making Space for Water: Taking Forward a New Government Strategy for Flood and Coastal Erosion Risk Management (2005)</b>			
<p>This 20-year strategy seeks to implement a more holistic strategy to flood and coastal erosion risks.</p> <p>The aim is to manage risks by employing an integrated portfolio of approaches which reflect both national and local priorities to reduce the threat to people and their property and to deliver the greatest environmental, social and economic benefits</p> <p>A whole catchment and whole shoreline approach will be adopted and adaptation to climate change will be an inherent part of flood and coastal erosion decisions.</p>	<p>There are no specific targets or indicators of relevance.</p>	<p>The DPD needs to ensure that development in floodplains is avoided and Flood Risk Assessments (FRAs) are completed where necessary.</p>	<p>The SA Framework should include objectives, targets and indicators that address flooding risk and the need to manage runoff effectively.</p>
<b>Waste Strategy for England (2007)</b>			
<p>The aim has to be to reduce waste by making products with fewer natural resources. The link between economic growth and waste growth must be broken. Most products should be re-used or their materials recycled. Energy should be recovered where possible. Land filling of residual waste, in small amounts, may be necessary.</p> <p>The strategy highlights that significant progress has been made since the 2000 strategy. However, performance still lags behind other European countries.</p> <p>The Government's key objectives are:</p> <ul style="list-style-type: none"> <li>▪ To decouple waste growth from economic growth and put more emphasis upon waste prevention and re-use.</li> <li>▪ Meet and exceed the Landfill Directive diversion targets for</li> </ul>	<p>The strategy includes targets for reducing household waste production but these are not relevant to this PPP review.</p> <p>The strategy expects a reduction of commercial and industrial waste going to landfill by at least 20% by 2010 compared to 2004.</p> <p>A number of indicators are used in the strategy to characterise current waste management in England.</p>	<p>The DPD should seek to ensure sustainable waste management.</p>	<p>The SA Framework should include objectives, indicators and targets that address sustainable waste management issues.</p>

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<p>biodegradable municipal waste in 2010, 2013 and 2020.</p> <ul style="list-style-type: none"> <li>▪ Increase diversion from landfill of non-municipal waste and secure better integration of treatment for municipal and non-municipal waste.</li> <li>▪ Secure the investment in infrastructure needed to divert waste from landfill and for the management of hazardous waste.</li> <li>▪ Get the most environmental benefit from investment through increased recycling of resources and recovery of energy from residual waste using a mix of technologies.</li> </ul>			
The Egan Review – Skills for Sustainable Communities (2004)			
<p><i>“Sustainable communities meet the diverse needs of existing and future residents, their children and other users, contribute to a high quality of life and provide opportunity and choice. They achieve this in ways that make effective use of natural resources, enhance the environment, promote social cohesion and inclusion and strengthen economic prosperity.”</i></p> <p>The key components of sustainable communities are:</p> <ul style="list-style-type: none"> <li>▪ Governance – effective and inclusive participation, representation and leadership.</li> <li>▪ Transport and connectivity – Good transport services and communications linking people to jobs, schools, health and other services.</li> <li>▪ Services – a full range of appropriate, accessible public, private community and voluntary services.</li> <li>▪ Environmental – providing places for people to live in an environmentally friendly way.</li> <li>▪ Economy – A flourishing and diverse local economy.</li> <li>▪ Housing and the Built Environment – a quality built and natural environment</li> <li>▪ Social and cultural – vibrant, harmonious and inclusive communities.</li> </ul>	<p>A series of indicators are defined for each of the key components to monitor progress. These include:</p> <ul style="list-style-type: none"> <li>▪ Percentage of population who live in wards ranking within the most deprived 10% and 25% of wards nationally.</li> <li>▪ Percentage of residents surveyed and satisfied with their neighbourhoods as a place to live.</li> <li>▪ Percentage of respondents surveyed who feel they ‘belong’ to the neighbourhood (or community).</li> <li>▪ Domestic burglaries per 1000 households and % detected.</li> <li>▪ Percentage of adults surveyed who feel they can influence decisions affecting their local area.</li> <li>▪ Household energy use (gas and electricity).</li> <li>▪ Percentage people satisfied with waste recycling facilities.</li> <li>▪ Average no. of days where air pollution is moderate or higher for NO<sub>2</sub>, SO<sub>2</sub>, O<sub>3</sub>, CO or PM<sub>10</sub>.</li> <li>▪ No. of unfit homes per 1,000 dwellings.</li> <li>▪ Percentage of Grade I and II* listed buildings at risk of decay.</li> <li>▪ Percentage of residents surveyed finding it easy to access key local services.</li> <li>▪ Percentage of people of working age in employment.</li> <li>▪ Average life expectancy.</li> <li>▪ No. of primary care professionals per 100,000 population.</li> </ul>	<p>The DPD should support the principles of the Egan Review and seek to develop sustainable communities.</p>	<p>There are a number of objectives and indicators in the document that should be integrated into the SA Framework.</p>

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Working for a Healthier Tomorrow – Dame Carol Black’s Review of the health of Britain’s working age population (2008)			
<p>This Review sets out the first ever baseline for the health of Britain’s working age population, seeking to lay the foundations for urgent and comprehensive reform through a new vision for health and work in Britain. Three principles lie at the heart of this vision:</p> <ul style="list-style-type: none"> <li>▪ Prevention of illness and promotion of health and well-being</li> <li>▪ Early intervention for those who develop a health condition</li> <li>▪ An improvement in the health of those out of work so that everyone with the potential to work has the support they need to do so</li> </ul> <p>The Review recognises the human, social and economic costs of impaired health and well-being in relation to working life in Britain. The aim of the Review is not to offer a utopian solution for improved health in working life, but more to identify the factors that stand in the way of good health and to elicit interventions (including services, changes in attitudes, behaviours and practices) that can help to overcome them.</p> <p>Monitoring the baseline presented in this Review will be critical, together with a research programme to inform future action with a comprehensive evidence base and increased cross-governmental effort to ensure progress.</p>	<p>Although there are no relevant targets within the Review, it presents a number of indicators of working age health, which include:</p> <ul style="list-style-type: none"> <li>▪ Life expectancy</li> <li>▪ Mortality during working age</li> <li>▪ Percentage of the working age population being in good, fairly good or poor health</li> <li>▪ Proportion of people out of work due to sickness or disability</li> <li>▪ Sickness absence per annum</li> <li>▪ Sickness notes issued per medical condition</li> <li>▪ Percentage of working time lost due to sickness</li> <li>▪ Percentage of working age population on incapacity benefits</li> <li>▪ Employment rate</li> <li>▪ Employment rate for disabled people</li> <li>▪ Income rates</li> <li>▪ Economic inactivity and reasons for inactivity, split into those inactive who would like to work and those seeking work</li> <li>▪ Proportion of deviation from perfect health by social class (Quality Adjusted Life Year health measure) and work status</li> <li>▪ Proportion of adult population who smoke</li> <li>▪ Work related illness by industry</li> <li>▪ Proportion of working age population with mental health conditions</li> <li>▪ Incapacity benefits claimants by primary medical condition</li> <li>▪ Costs of working age ill health</li> </ul>	<p>The DPD should consider issues relating to human health. Planning and DPDs can contribute to improving quality of life.</p>	<p>The SA Framework should include objectives that seek to protect human health and reduce health inequalities.</p>
Health Effects of Climate Change in the UK 2008 – An update of the Department of Health Report 2001/2002			
<p>The 2001/2 Report and its update seek to provide quantitative estimates of the possible impacts of climate change on health. Since the original report, the assessment of future climate change has been updated. A new generation of high-resolution climate models has allowed for improved estimates of future changes in the</p>	<p>A number of indicators are presented in this Report. The key ones include:</p> <ul style="list-style-type: none"> <li>▪ Mean annual temperature</li> <li>▪ Number of days per year with daily mean exceeding 20°C</li> </ul>	<p>The DPD should address the issues relating to climate change, and the need to encourage provision of</p>	<p>The SA Framework should include objectives that address climate change issues including flooding and</p>

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<p>frequency, intensity and duration of extreme events in the UK. Some of the major areas of concern are:</p> <ul style="list-style-type: none"> <li>▪ Flooding</li> <li>▪ Vector-borne diseases</li> <li>▪ Food-borne diseases</li> <li>▪ The effects of climate change on drinking water supplies</li> <li>▪ The direct effects of high temperatures</li> <li>▪ The air pollution climate</li> <li>▪ Exposure to ultra-violet light</li> </ul>	<ul style="list-style-type: none"> <li>▪ Number of days per year with daily mean below 0°C</li> <li>▪ Annual total rainfall</li> <li>▪ Seasonal rainfall</li> <li>▪ Maximum daily wind speed</li> <li>▪ Annual highest maximum daily wind speed</li> <li>▪ Annual cases of malaria</li> </ul>	high quality and flexible health services that are accessible to new developments.	the need to reduce greenhouse gas emissions. It should also include an objective related to human health.
Tackling Health Inequalities – A Programme for Action (2003, including the 2007 Status Report on the Programme for Action)			
<p>This Programme for Action was prepared by the Department of Health, setting out plans for the following three years to tackle health inequalities that are found across different geographical areas, between genders and different ethnic communities and also between different social and economic groups. It established the foundations required to achieve the challenging national target to reduce the gap in infant mortality across social groups, and raise life expectancy in the most disadvantaged areas faster than elsewhere, by 2010.</p> <p>The programme was organised around four themes:</p> <ul style="list-style-type: none"> <li>▪ Supporting families, mothers and children – to ensure the best possible start in life and break the inter-generational cycle of health</li> <li>▪ Engaging communities and individuals – to ensure relevance, responsiveness and sustainability</li> <li>▪ Preventing illness and providing effective treatment and care – making certain that the NHS provides leadership and makes the contribution to reducing inequalities that is expected of it</li> <li>▪ Addressing the underlying determinants of health – dealing with the long-term underlying causes of health inequalities</li> </ul> <p>These themes are underpinned by discrete principles to guide how health inequalities are tackled in practice.</p> <p>The programme sets out an ambitious agenda including targets and milestones, in order to help to reduce inequalities by progressing against the 2010 national target and also tackling the underlying causes in the future.</p>	<p>The Programme for Action presents a number of national headline indicators that can be attributed to health inequality, including the following:</p> <ul style="list-style-type: none"> <li>▪ Primary care professionals per 100,000 population</li> <li>▪ Road casualties in disadvantaged communities</li> <li>▪ Proportion of children living in low-income households</li> <li>▪ Proportion of those aged 16 who get qualifications equivalent to 5 GCSEs at grades A* to C</li> <li>▪ Proportion of households living in non-decent housing</li> <li>▪ Prevalence of smoking among people in manual social groups, and among pregnant women</li> <li>▪ Age-standardised death rates per 100,000 population for the major killer diseases (cancer, circulatory diseases), ages under 75 (for the 20% of areas with the highest rates compared to the national average).</li> </ul>	The DPD should address the issues relating to climate change, and the need to encourage provision of high quality and flexible health services that are accessible to new developments.	The SA Framework should include objectives that seek to protect human health and reduce health inequalities.
By All Reasonable Means: Inclusive Access To The Outdoors For Disabled People (Countryside Agency, 2005)			
This guide is designed to help countryside and urban greenspace managers and landowners improve accessibility of their sites, routes	The guide does not contain targets or indicators.	The DPD should support inclusive	The SA should consider issues of access for all

National Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for DPD	Implications for SA
and facilities.		access to the outdoors.	groups.
<b>National Planning Policy Framework (2012)</b>			
<p>The National Planning Policy Framework sets out the Government's economic, environmental and social planning policies for England. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.</p> <p>The Government aims to achieve sustainable development through:</p> <ul style="list-style-type: none"> <li>▪ Building a strong, competitive economy</li> <li>▪ Ensuring the vitality of town centres</li> <li>▪ Supporting a prosperous rural economy</li> <li>▪ Promoting sustainable transport</li> <li>▪ Supporting high quality communications infrastructure</li> <li>▪ Delivering a wide choice of high quality homes</li> <li>▪ Requiring good design</li> <li>▪ Promoting healthy communities</li> <li>▪ Protecting green belt land</li> <li>▪ Meeting the challenge of climate change, flooding and coastal change</li> <li>▪ Conserving and enhancing the natural environment</li> <li>▪ Conserving and enhancing the historic environment</li> <li>▪ Facilitating the sustainable use of minerals</li> </ul>	There are no specific targets or indicators of relevance.	The DPD should adhere to the principles of the draft Planning Policy Framework ensuring that all aspects of the core land-use planning principles underpin the plan-making process.	The SA Framework should include objectives relating to economic, environmental and social issues.
<b>National Planning Practice Guidance (2013 with ongoing updates)</b>			
<p>The planning practice guidance sets out clear and concise advice on a range of issues including:</p> <ul style="list-style-type: none"> <li>▪ new affordability test for determining how many homes should be built</li> <li>▪ opening up planning appeal hearings to be filmed</li> <li>▪ discouraging councils from introducing a new parking tax on people's driveways and parking spaces</li> <li>▪ encourage more town centre parking spaces and end aggressive 'anti-car' traffic calming measures like speed bumps</li> <li>▪ housing for older people - councils should build more bungalows and plan positively for an ageing population</li> <li>▪ new neighbourhood planning guidance to help more</li> </ul>	The guide documents do not contain targets or indicators.	This guidance should be used to inform the DPD.	This SA Framework should take this guidance into consideration.

National Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for DPD	Implications for SA
<p>communities start their own plans</p> <ul style="list-style-type: none"> <li>▪ new local green space guidance to help councils and local communities to plan for open space and protect local green spaces which are special to them</li> </ul> <p>There are a selection of guides including the following:</p> <ul style="list-style-type: none"> <li>▪ Air quality</li> <li>▪ Climate change</li> <li>▪ Conserving and enhancing the historic environment</li> <li>▪ Ensuring the vitality of town centres</li> <li>▪ Flood risk and coastal change</li> <li>▪ Health and wellbeing</li> <li>▪ Housing and economic development needs assessment</li> <li>▪ Local Plan</li> <li>▪ Natural Environment</li> <li>▪ Open space, sports and recreation facilities, public rights of way and local green space</li> </ul>			
Localism Act 2011			
<p>The Localism Act contains a number of proposals to give local authorities new freedoms and flexibility shifting power from the central state. In summary the Act gives:</p> <ul style="list-style-type: none"> <li>▪ New freedoms and flexibilities for local government; <ul style="list-style-type: none"> <li>- Gives local authorities everywhere the formal legal ability and greater confidence to get on with the job of responding to what local people want</li> <li>- Cuts red tape to enable councillors everywhere to play a full and active part in local life without fear of legal challenge</li> <li>- Encourages a new generation of powerful leaders with the potential to raise the profile of English cities, strengthen local democracy and boost economic growth</li> <li>- Enables ministers to transfer functions to public authorities in cities in order to harness their potential to drive growth and prosperity</li> </ul> </li> <li>▪ New rights and powers for local communities <ul style="list-style-type: none"> <li>- Makes it easier for local people to take over the amenities they love and keep them part of local life</li> <li>- Ensures that local social enterprises, volunteers and</li> </ul> </li> </ul>	There are no specific targets or indicators of relevance.	The DPD should be mindful of the key principles of this Act.	The SA Framework should be mindful of this Act as its principles will help to create vibrant, cohesive and empowered communities within Blackpool.

National Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for DPD	Implications for SA
<p>community groups with a bright idea for improving local services get a chance to change how things are done</p> <ul style="list-style-type: none"> <li>- Enables local residents to call local authorities to account for the careful management of taxpayers' money</li> </ul> <ul style="list-style-type: none"> <li>▪ Reform to make the planning system clearer, more democratic and more effective           <ul style="list-style-type: none"> <li>- Places significantly more influence in the hands of local people over issues that make a big difference to their lives</li> <li>- Provides appropriate support and recognition to communities who welcome new development</li> <li>- Reduces red tape, making it easier for authorities to get on with the job of working with local people to draw up a vision for their area's future</li> <li>- Reinforces the democratic nature of the planning system               <ul style="list-style-type: none"> <li>- passing power from bodies not directly answerable to the public, to democratically accountable ministers</li> </ul> </li> </ul> </li> <li>▪ Reform to ensure that decisions about housing are taken locally           <ul style="list-style-type: none"> <li>- Enables local authorities to make their own decisions to adapt housing provision to local needs, and make the system fairer and more effective</li> <li>- Gives local authorities more control over the funding of social housing, helping them to plan for the long term</li> <li>- Gives people who live in social housing new ways of holding their landlords to account, and make it easier for them to move</li> </ul> </li> </ul>			
Good Practice Guide on Planning for Tourism (2006)			
<p>This Good Practice Guide replaces PPG21: Tourism. The document is intended to:</p> <ul style="list-style-type: none"> <li>▪ Ensure that planners understand the importance of tourism when preparing development plans and taking planning decisions.</li> <li>▪ Ensure that those involved in the tourism industry understand the principles of national planning policy as they apply to tourism.</li> <li>▪ Ensure that planners and the tourism industry work together effectively to facilitate, promote and deliver new tourism developments in a sustainable way.</li> </ul> <p>The guide highlights the strong link between tourism and the quality</p>	<p>There are no specific targets or indicators of relevance.</p>	<p>The DPD needs to recognise the potential benefits offered by tourism and seek to identify areas where further development could occur. However, the full environmental implications of such development must be appropriately mitigated.</p>	<p>The SA should include objectives relating to economic development including tourism and also the protection of the environment.</p>

**National Plans**

Key Objectives Relevant to Plan and SA

Key Targets and Indicators Relevant to Plan and SA

Implications for DPD

Implications for SA

of the environment.



## Summary of Regional and Sub-Regional Plans

Regional and Sub-Regional Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for DPD	Implications for SA
Lancashire's Local Transport Plan 2011 - 2021			
<p>There are seven transport goals for the plan which will enable the shared transport priorities and the wider social and economic objectives of the County Council to be met. They are to:</p> <ul style="list-style-type: none"> <li>▪ To help to secure a strong economic future by making transport and travel into and between our major economic centres more effective and efficient and by improving links to neighbouring major economic areas and beyond.</li> <li>▪ To provide all sections of the community with safe and convenient access to the services, jobs, health, leisure and educational opportunities that they need.</li> <li>▪ To improve the accessibility, availability and affordability of transport as a contribution to the development of strong and cohesive communities.</li> <li>▪ To create more attractive neighbourhoods by reducing the impact of transport on our quality of life and by improving our public realm.</li> <li>▪ To reduce the carbon impact of Lancashire's transport requirements, whilst delivering sustainable value for money transport options to those who need them.</li> <li>▪ To make walking and cycling more safe, convenient and attractive, particularly in the more disadvantaged areas of Lancashire, bringing improvements in the health of Lancashire's residents.</li> <li>▪ In all that we do, to provide value for money by prioritising the maintenance and improvement of Lancashire's existing transport infrastructure where it can help to deliver our transport goals.</li> </ul> <p>The LTP states that Lancashire County Council will invest £22.21 million on highways and transport services in Blackpool, with £7.70 million of capital funding and £14.51 million of revenue support. It will be targeted at:</p> <ul style="list-style-type: none"> <li>▪ Proper access to employment areas for those without access to a car</li> <li>▪ Tackling rural isolation</li> </ul>	<p>Progress of the plan will be measures using a series of performance indicators grouped under the following headings:</p> <ul style="list-style-type: none"> <li>▪ Supporting Economic Growth and Regeneration</li> <li>▪ Access to Education and Employment</li> <li>▪ Improving Accessibility, Quality of Life and Well-being</li> <li>▪ Improving Safety</li> <li>▪ Affordable and Sustainable Transport</li> <li>▪ Care of Our Assets</li> <li>▪ Reducing Carbon Emissions and its Effects</li> </ul>	<p>The DPD needs to encompass transportation issues and the LTP goals.</p>	<p>The SA Framework should include the goals and indicators within the plan to address transport and accessibility, and seek to ensure that any new transport development in the Borough is sustainable and encourages a modal shift away from the use of the private car.</p>
Joint Lancashire Minerals and Waste Development Framework Core Strategy DPD (2009)			
<p>The Core Strategy sets the vision and direction – the amounts, broad locations and priorities – for future mineral extraction and waste</p>	<ul style="list-style-type: none"> <li>▪ 25% of construction aggregates to be recycled or secondary materials by 2021.</li> </ul>	<p>The DPD should take account of any minerals</p>	<p>The SA Framework should include</p>

Regional and Sub-Regional Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for DPD	Implications for SA
<p>management in Lancashire, Blackburn with Darwen and Blackpool. It will guide the more specific locations for any new quarries and waste facilities, including sites for recycling and composting facilities, treatment plants, and any possible new landfill sites in the future. Its high level objectives are:</p> <ul style="list-style-type: none"> <li>▪ Safeguarding Lancashire's mineral resources</li> <li>▪ Minimising the need for minerals extraction</li> <li>▪ Meeting the demand for new minerals</li> <li>▪ Identifying sites and areas for minerals extraction</li> <li>▪ Achieving sustainable minerals production</li> <li>▪ Community involvement and partnership working</li> <li>▪ Promoting waste minimisation and increasing waste awareness</li> <li>▪ Managing our waste as a resource</li> <li>▪ Identifying capacity for managing our waste</li> <li>▪ Achieving sustainable waste management</li> </ul>	<ul style="list-style-type: none"> <li>▪ Zero growth in industrial and commercial waste</li> <li>▪ 1% growth in municipal waste</li> <li>▪ 1% growth in construction and demolition waste</li> <li>▪ Recycle and compost 46% of MSW by 2010, to reach 56% by 2015 and 61% by 2020</li> <li>▪ Additionally recover value from 18% of MSW by 2015</li> <li>▪ Recycle 35% of industrial and commercial waste by 2010, 40% by 2015 and 45% by 2020</li> <li>▪ Additionally recover value from 30% of I&amp;C waste by 2010, falling to 25% by 2020</li> <li>▪ Recycle 50% of commercial and domestic waste by 2010, 55% by 2015 and 60% by 2020</li> <li>▪ Additionally recover value from 42 % of C&amp;D waste by 2010, falling to 35% by 2020</li> </ul>	and waste issues that are likely to affect the Borough.	objectives, targets and indicators that seek to promote sustainable waste management and effective resource use.
<b>Joint Lancashire Minerals and Waste Local Plan – Site Allocation and Development Management Policies Part 1 and Part 2 (2013)</b>			
The plan provides site specific policies and allocations, and detailed development management policies for minerals and waste planning in the areas covered by the Councils of Lancashire, Blackpool and Blackburn with Darwen. It should be read together with the Joint Lancashire Minerals and Waste Local Plan Core Strategy adopted in 2009 and the individual local plans of the two unitaries and the twelve districts which make up the Plan area.	The plan outline development management policies which when read in conjunction with the Minerals and Waste Core Strategy support key targets and indicators identified within the core strategy.	The DPD should take account of these policies and any minerals and waste issues that are likely to affect the Borough.	The SA Framework should include objectives, targets and indicators that seek to promote sustainable waste management and effective resource use.
<b>Lancashire's Municipal Waste Strategy 2008 – 2020 Rubbish to Resources</b>			
<p>The key Strategy Objectives are:</p> <ul style="list-style-type: none"> <li>▪ To recognise municipal waste as a resource.</li> <li>▪ To minimise the amount of municipal waste produced.</li> <li>▪ To maximise recovery of organic and non-organic resources.</li> <li>▪ To deal with waste as near to where it is produced as possible.</li> <li>▪ To minimise contamination of the residual waste stream.</li> <li>▪ To minimise the amount of waste going for disposal to landfill.</li> <li>▪ Where landfill does occur to minimise its biodegradable content.</li> <li>▪ To effectively manage all municipal waste within the wider waste context.</li> <li>▪ To develop local markets and manufacturing for recovered materials.</li> </ul>	<p>Key targets of this strategy include:</p> <ul style="list-style-type: none"> <li>▪ Reduce and stabilise waste to 0% growth each year</li> <li>▪ Continue to provide financial support for awareness raising, education campaigns and other initiatives</li> <li>▪ Extend the three-stream collection to all households and to extend the segregated collection service to all households to include the collection of food waste for composting.</li> <li>▪ Recycle and compost 56% of all waste by 2015, increasing to 61% by 2020</li> <li>▪ Recover 81% of all waste by 2015 and 88% by 2020</li> <li>▪ Reuse, recycle and compost 70% every year at each Household Waste Recycling Centre</li> </ul>	The key objectives in the plan should be carried forward into the DPD. The planning process should promote recycling and re-use of materials in preference to landfilling.	The SA should promote sustainable waste management principles.

Regional and Sub-Regional Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for DPD	Implications for SA
<ul style="list-style-type: none"> <li>▪ To achieve sustainable waste management.</li> <li>▪ To develop strong partnerships between local authorities, community groups and the private sector.</li> <li>▪ To ensure services are accessible to all residents.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Provide a network of facilities to manage and treat Lancashire County Council and Blackpool Council's municipal waste.</li> </ul>		
<b>Lancashire Strategic Economic Plan (2014)</b>			
The LSEP identifies key priorities and programmes, which command local support and funding commitments. All programmes have the ability to deliver and benefit from Growth Deal and European Structural & Investment Fund support from 2015/16 onwards. The LSEP is also seeking a number of specific Government policy flexibilities to maximise their impact.	The Growth Deal Innovation Excellence Programme represents a comprehensive £270m investment framework, involving 11 major initiatives, which can deliver nearly 3,000 new employment opportunities, safeguard a further 1,500 jobs, and generate almost £400m in new GVA by 2020.	The DPD should promote the priorities and outcomes of this plan.	The SA Framework should consider objectives, targets and indicators that support this plan.
<b>Lancashire Growth Deal (2014)</b>			
<p>Lancashire's Growth Deal takes the vision, objectives and priorities of the SEP and sets out an integrated programme of interventions that the LEP believes are capable of generating the step change required to move the local economy forward.</p> <p>The Growth Deal identifies six key priorities, set out below, against which the LEP's Single Local Growth Fund is set out.</p> <p>The six key priorities are:</p> <ol style="list-style-type: none"> <li>1. <b>Sector Development &amp; Growth</b> Realise the full potential of Lancashire's competitive economic strengths and business base.</li> <li>2. <b>Innovation Excellence</b> Maximise the economic value of Lancashire's centres of research and innovation excellence and globally competitive business clusters.</li> <li>3. <b>Skills for Growth</b> Refocus Lancashire's approach to skills provision, ensuring it is responsive to business needs and demands.</li> <li>4. <b>Business Growth &amp; Enterprise</b> Strengthen and refresh Boost, Lancashire's business growth hub, and improve our strategic marketing capacity to attract new investors and occupiers.</li> <li>5. <b>Releasing Local Growth Potential</b> Create the right conditions for business and investor growth, and unlock new development and employment opportunities across Lancashire.</li> <li>6. <b>The Renewal of Blackpool</b> Focus on addressing</li> </ol>	The Growth Deal includes a number of aims and projects which are linked to each of its priority areas that collectively contribute to improving the local economy.	The DPD should recognise the significance of the growth deal in shaping the local economy and facilitating future growth.	The SA Framework should include objectives, targets and indicators that seek to enable economic growth.

Regional and Sub-Regional Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for DPD	Implications for SA
Blackpool's unique characteristics which require a specific focus, to create economic opportunities for its local communities.			
<b>Lancashire Growth Plan 2013/2014</b>			
<p>The plan sets out how the Lancashire Enterprise Partnership intends to achieve strong and sustainable economic growth.</p> <p>The Growth Plan provides the opportunity to articulate the LEPs agenda for change, with the LEPs purpose and focus to:</p> <ul style="list-style-type: none"> <li>▪ Establish Lancashire as a natural home for high growth companies</li> <li>▪ Reclaim Lancashire's role as one of the nation's key centres for advanced manufacturing</li> <li>▪ Maximise the economic value and benefits of an emerging arc of innovation across Lancashire</li> <li>▪ Drive forward the Lancashire Enterprise Zone and Preston City Deal, as the key drivers of new growth</li> <li>▪ Oversee and develop complementary Local Growth Accelerator Strategies</li> <li>▪ Develop Sector Delivery Plans to unlock opportunities of national significance in emerging and established growth sectors</li> <li>▪ Create the right local conditions for business success</li> <li>▪ Refocus the local skills system to make it more responsive to business skills demands</li> <li>▪ Ensure Lancashire's major transport projects are fully aligned with the delivery of key economic priorities</li> <li>▪ Strengthen Lancashire's strategic casemaking and refresh the area's offer to attract new investors and businesses</li> </ul>	The Growth Plan includes a number of aims and projects that collectively seek to contribute to improving the local economy.	The DPD should recognise the significance of the growth plan in shaping the local economy and facilitating future growth.	The SA Framework should include objectives, targets and indicators that seek to enable economic growth.
<b>City Implementation Plan 2015-2018</b>			
<p>The Preston, South Ribble and Lancashire City Deal agreed with Government, builds on the strong economic performance of the area over the last 10 years and will help to ensure that the city deal area continues to grow by addressing strategic transport infrastructure and development challenges to deliver new jobs and housing across the city deal area.</p> <p>This document sets out the arrangements for the City Deal implementation for the period 2015-2018 outlining critical financial and project delivery milestones and risks, and the management</p>	<p>Over a ten-year period the deal will generate:</p> <ol style="list-style-type: none"> <li>1. More than 20,000 net new private sector jobs, including 5,000 in the Lancashire Enterprise Zone;</li> <li>2. Nearly £1 billion growth in Gross Value Added (GVA);</li> <li>3. 17,420 new homes; and</li> <li>4. £2.3 billion in leveraged commercial investment.</li> </ol>	The DPD should consider the city deal priorities and should address the development of transport infrastructure.	The SA Framework should include objectives, targets and indicators that relate to transport infrastructure.

Regional and Sub-Regional Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for DPD	Implications for SA
mechanisms in support of government monitoring and reporting processes.			
<b>Lancashire Sport Partnership Strategy 2013-2017</b>			
<p>Lancashire Sport Partnership, is part of the network of 49 County Sport Partnerships across the Country. The Partnership is the 'one voice for sport' in Lancashire, co-ordinating delivery to avoid duplication and ensuring the optimum use of existing and potential resources. Within Lancashire local partners include Local Authorities, National Governing Bodies of Sport, Sports Clubs, Schools, Colleges and Universities, and Health, the Constabulary and Voluntary sector organisations.</p> <p>The partnership aims to improve the health and well-being of the groups below by growing the number of people taking part in sport and physical activity, retaining those already involved, and improving the infrastructure.</p> <p>The priorities agreed as groups who are less likely to take part in sport and physical activity:</p> <ul style="list-style-type: none"> <li>▪ Young People (11-25)</li> <li>▪ Disabled People (11 plus)</li> <li>▪ Women</li> <li>▪ Girls (11-17)</li> <li>▪ Inactive People (11 plus)</li> <li>▪ People resource (Coaches &amp; Volunteers)</li> <li>▪ Places resource (Clubs &amp; Facilities)</li> </ul>	The strategy outlines a focus for each group linked to either growth, retaining or improving participation, activity and skills.	The DPD should seek to contribute towards improving health, well-being and physical activity among the population.	The SA Framework should include objectives, indicators and targets that relate to health, well-being and physical activity.
<b>Countryside Character Volume 2: North-West (1998)</b>			
This document presents the results of Natural England's survey of the countryside character and landscape of the North-West. It reflects the guidance issued by the Countryside Agency and Scottish Natural Heritage (2002), referred to in the National Plans and Policies section above.	The document contains no targets or indicators.	Landscape character should form a component of the DPD baseline and should be considered when proposing new development.	The SA Framework should include an objective on landscape quality.
<b>Lancashire Landscape Character Assessment and Landscape Strategy (2000)</b>			
The four main objectives of the landscape character assessment are: <ul style="list-style-type: none"> <li>▪ To outline how the landscape of Lancashire has evolved in terms</li> </ul>	There are no specific targets or indicators of relevance. However, it will important for the SA to take into	The DPD should include seek to restore, protect	The landscape character assessment

Regional and Sub-Regional Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for DPD	Implications for SA
<p>of physical forces and human influences.</p> <ul style="list-style-type: none"> <li>To classify the landscape into distinct landscape types identifying key characteristics and sensitivities and providing principles to guide landscape change.</li> <li>To describe the current appearance of the landscape, classifying it into distinct zones of homogenous character, summarising the key features of each landscape character area.</li> <li>To describe the principal urban landscape types across the County, highlighting their historical development.</li> </ul> <p>The document outlines the characteristics of the Lancashire landscape and divides the landscape into character areas.</p> <p>The strategy objectives are:</p> <ul style="list-style-type: none"> <li>To review the forces for change that are affecting the landscape, highlighting key issues and implications of different forms of development and land use change for landscape character and quality.</li> <li>For each landscape character type, to identify key environmental features and the specific implications of change, as well as appropriate strategies and actions to manage and guide the landscape change in a positive way.</li> <li>To produce an overview of strategic issues for Lancashire, identifying the key actions that need to be taken to bring about positive landscape change, including the development of landscape indicators and targets.</li> </ul> <p>For each of the landscape character types a series of recommendations are outlined to protect, restore and enhance various landscape elements.</p>	<p>consideration the recommendations for each of the relevant landscape character types.</p>	<p>and enhance landscape and townscape character and quality.</p>	<p>has been used to identify the baseline conditions and the SA Framework should include objectives, indicators and targets relating the preservation and enhancement of landscape and townscape quality.</p>
<b>Lancashire Climate Change Strategy 2009 -2020</b>			
<p>The Lancashire Climate Change Strategy sets out the Partnership's long-term vision that Lancashire is "low carbon and well adapted by 2020". The key objectives of this strategy are to:</p> <ul style="list-style-type: none"> <li>Reduce greenhouse gas emissions resulting from the use of energy in homes, by improving energy efficiency, minimising waste and exploiting renewable sources of energy.</li> <li>Reduce greenhouse gas emissions through better waste management, including waste minimisation and increased recycling.</li> <li>Develop and maintain an integrated, efficient and sustainable transport system.</li> </ul>	<p>A key target of this strategy is that it aims that in 2020 Lancashire will have reduced its emissions of CO<sub>2</sub> by at least 30% relative to 1990.</p> <p>The strategy also includes the following national indicators which may be of relevance to the SA and LDF:</p> <ul style="list-style-type: none"> <li>CO<sub>2</sub> reduction from local authority operations.</li> <li>Per capita reduction in CO<sub>2</sub> emissions in the LA area.</li> <li>Tackling fuel poverty - % of people receiving income based benefits living in homes with a low energy efficiency rating.</li> </ul>	<p>The DPD should recognise local action needs to be taken with regard to climate change issues and should seek to contribute towards achieving Lancashire's CO<sub>2</sub> reduction target.</p>	<p>The SA Framework should include objectives, indicators and targets that relate to climate change and the need to reduce greenhouse gas emissions.</p>

Regional and Sub-Regional Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for DPD	Implications for SA
<ul style="list-style-type: none"> <li>▪ Increase the use of public transport, walking and cycling.</li> <li>▪ Promote the use of more efficient vehicles and alternative transport fuels, including sustainable bio-fuels.</li> <li>▪ Encourage a sustainable and competitive Lancashire economy that will measure, mitigate and reduce its contribution to climate change, through energy and resource efficiency actions.</li> <li>▪ Create an informed, skilled and environmentally responsible work force and work place able to compete in an emerging and diverse 'environmental economy'.</li> <li>▪ Ensure that future economic plans ensure a low carbon economy.</li> <li>▪ More efficient use of resources and more environmentally-aware procurement, including of infrastructure.</li> <li>▪ Actively promote decentralised energy production and medium and large scale renewable energy generation</li> <li>▪ Make the most of Lancashire's environmental assets and ensure that the climate change mitigation and adaptation functions of Lancashire's green infrastructure are maximised to deliver economic, environmental and social benefits.</li> <li>▪ Support the development of mechanisms to reduce greenhouse gas emissions through the sustainable management of Lancashire's woodlands.</li> <li>▪ Manage Lancashire's upland and lowland peat lands to sequester carbon and prevent its release.</li> <li>▪ Identify what the impacts of climate change on biodiversity will be in Lancashire and support the uptake of practical adaptation measures.</li> <li>▪ Ensure development and critical infrastructure is resilient to flooding and other climate change impacts and the risk of these impacts are managed effectively.</li> <li>▪ Realise the economic development opportunities associated with developing adaptation capacity in Lancashire.</li> <li>▪ Support practical measures to allow Lancashire's biodiversity to adapt to climate impacts.</li> <li>▪ Encourage strong community participation in climate solutions.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Planning to adapt to climate change.</li> </ul>		
<b>Biodiversity Action Plan for Lancashire (various dates)</b>			
<p>The plan comprises a series of action plans for habitats and species in Lancashire.</p> <p>For each of the habitats and species information is provided about</p>	<p>For each habitat type/species a series of objectives, actions and timescales for implementation are identified.</p> <p>The actions are also assigned a priority for implementation</p>	<p>The DPD should support and promote the enhancement of</p>	<p>The relevant objectives, targets and indicators should be integrated</p>

Regional and Sub-Regional Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for DPD	Implications for SA
current national, regional and local status.	i.e. low, medium and high.	biodiversity.	into the SA Framework.
<b>Lancashire Woodland Vision 2006-2015</b>			
<p>The document seeks to guide new planting and woodland management in the context of the Lancashire landscape strategy. Main objectives are to:</p> <ul style="list-style-type: none"> <li>Formulate a strategy or vision to guide the development of woodlands and associated businesses in Lancashire.</li> <li>Produce local woodland vision statements for the 21 landscape character types and urban landscape types of Lancashire.</li> <li>Identify priorities for woodland planting and management action.</li> <li>Assist in formulating advice and targeting resources through existing and proposed grant aid schemes.</li> <li>Inform the public at large of woodlands and their management in the context of Lancashire landscapes.</li> </ul> <p>There is a specific vision and objective for the woodland resource in each of the landscape character types.</p>	There are no specific targets or indicators of relevance.	The DPD should take opportunities to promote urban forestry and street trees and to protect the wider biodiversity resource.	The SA Framework should include objectives that seek to protect biodiversity including woodland.
<b>North West River Basin District Flood Risk Management Plan 2015-2021 (2016)</b>			
<p>Risk Management Authorities are committed to producing Flood Risk Management Plans (FRMPs) required by the EU Floods Directive. This FRMP is an important part of meeting that objective and aligns with the Defra Strategy and guiding principles of the National Flood and Coastal Erosion Risk Management Strategy.</p> <p>The FRMP will provide the evidence to support decision making. The FRMP will also help promote a greater awareness and understanding of the risks of flooding, particularly in those communities at high risk, and encourage and enable householders, businesses and communities to take action to manage the risks. The highest priority is to reduce risk to life.</p>	The Plans do not contain specific targets or indicators.	The DPD should consider potential flood risk, and prevent development within the floodplain.	The SA Framework should include objectives that promote reduction and management of flood risk.
<b>North West River Basin Management Plan: Part 1 and Part 2 (2015)</b>			
<p>The River Basin Management Plan provides a framework for protecting and enhancing the benefits provided by the water environment. To achieve this, and because water and land resources are closely linked, it also informs decisions on land-use planning. This plan contains 4 sets of information that groups who manage land and water should pay particular attention to:</p>	<p>The Plan identifies contributions to environmental outcomes for 2021 including:</p> <ul style="list-style-type: none"> <li>A programme of improvements (currently in development phase) including actions to improve habitat quality and connectivity, improve water quality, provide natural flood management for improved climate resilience.</li> <li>Additionally, a sub-project targeting rural pollution in the</li> </ul>	The DPD should consider how the water environment can be protected and enhanced.	The SA Framework should include objectives that consider effects upon water quality and resource.



Regional and Sub-Regional Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for DPD	Implications for SA
<ul style="list-style-type: none"> <li>▪ Baseline classification of water bodies</li> <li>▪ Statutory objectives for protected areas</li> <li>▪ Statutory objectives for water bodies</li> <li>▪ Summary programme of measures to achieve statutory objectives</li> </ul> <p>This plan is an update of and replaces the river basin management plan published in 2009.</p>	<p>Lower Ribble will improve water quality and contribute to improvement of bathing waters.</p>		
<b>Lancashire and Blackpool Local Flood Risk Management Strategy (2013)</b>			
<p>The Lancashire and Blackpool Flood Risk Management Strategy (LFRMS) has been produced by Lancashire County Council as Lead Local Flood Authority (LLFA), in partnership with Blackpool Council. The Flood Water Management Act places a legal duty on each LLFA to produce a LRMS and this document creates a framework around which flood risk management will be undertaken by the LLFA.</p>	<ul style="list-style-type: none"> <li>▪ The LFRMS identifies strategic objectives which are sub-divided into short term (within 1 year) and medium term (within 1 to 3 years). These strategic objectives include:</li> <li>▪ Identify Risk Management Authorities (RMAs) and define each RMA's roles and responsibilities in relation to managing risk from all sources of flooding</li> <li>▪ Deliver flood risk management through effective partnership working</li> <li>▪ Establish effective data sharing agreements</li> <li>▪ Take account of climate change when fulfilling duties and responsibilities in flood risk management</li> <li>▪ Understand key local flood risks</li> <li>▪ Work together with other RMAs to investigate and manage interactions between Main River, coastal flooding, sewer flooding and local flood risks</li> <li>▪ Record, investigate and report flooding incidents</li> <li>▪ Ensure alignment of local Flood Risk Management and Emergency Planning functions</li> <li>▪ Manage development so that it reduces flood risk</li> <li>▪ Promote the use of SuDS</li> <li>▪ Encourage stakeholder and community involvement in flood risk management</li> <li>▪ Set out an asset management plan</li> <li>▪ Work with the owners of assets with a flood risk management function</li> <li>▪ Define the approach to, and opportunities for, resourcing and funding local flood risk management activities</li> </ul>	<p>The DPD should consider how flood risk from local sources will be managed.</p>	<p>The SA Framework should include indicators, targets and objectives that address flood risk management.</p>

Regional and Sub-Regional Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for DPD	Implications for SA
	<ul style="list-style-type: none"> <li>▪ Encourage beneficiaries to invest in local flood risk management</li> <li>▪ Integrate economic, social and environmental improvements with local flood risk management in line with sustainability principles</li> <li>▪ Encourage innovation in local flood risk management</li> <li>▪ Allow RMAs to make efficient decisions on flood risk management and exploit opportunities effectively</li> <li>▪ Five RMAs powers to undertake flood related works</li> </ul>		
Lancashire County Council Rights of Way Improvement Plan 2015-2025 Consultation Draft			
<p>The plan consists of an assessment which sets out the adequacy of the rights of way and wider access network in Lancashire and a Statement of Action which sets out how the council will work with others to address the demands and needs identified in the assessment; as summarised below:</p> <p>The assessment of need:</p> <ul style="list-style-type: none"> <li>▪ The extent to which local rights of way meet present and future needs of the public,</li> <li>▪ The opportunities presented by local rights of way for exercise and other forms of open-air recreation and the enjoyment of the authorities' area with particular emphasis on footpaths, cycle tracks, bridleways and restricted byways</li> <li>▪ The accessibility of the local rights of way network to blind or partially sighted persons and others with mobility problems</li> </ul> <p>The statement of actions:</p> <ul style="list-style-type: none"> <li>▪ Manage public rights of way</li> <li>▪ Secure an improved network of public rights of way</li> <li>▪ Improve wider public access</li> </ul>	<p>Aims and objectives are focussed around six inter-related themes each of which identify an action and timescale:</p> <ul style="list-style-type: none"> <li>▪ Theme 1: Condition and connectivity of the wider access network</li> <li>▪ Theme 2: Education and information provision</li> <li>▪ Theme 3: Twenty to thirty minute walks</li> <li>▪ Theme 4: Multi user routes</li> <li>▪ Theme 5: Encourage community involvement in improving wider access</li> <li>▪ Theme 6: The Definitive Map and other records</li> </ul>	<p>The implications on rights of way, access and recreation should be considered in the preparation of the DPD.</p>	<p>Baseline information, issues and opportunities are identified within the Improvement Plan. These should be considered when developing the SA Framework.</p>
Forest of Bowland Management Plan April 2014 - March 2019			
<p>The aims of the Forest of Bowland Management Plan are to:</p> <ul style="list-style-type: none"> <li>▪ Protect, conserve and enhance the natural and cultural heritage of the Forest of Bowland</li> <li>▪ AONB.</li> <li>▪ Promote the sustainable social and economic development of the area, particularly where such activity conserves and enhances the environment.</li> <li>▪ Encourage enjoyment of the area where it is compatible.</li> </ul>	<p>The Forest of Bowland Management Plan contains many targets. The most relevant of which are listed below:</p> <ul style="list-style-type: none"> <li>▪ Ensure 100% of the AONB's SSSIs are in favourable or recovering condition</li> <li>▪ Ensure at least 50% of SSSIs are in favourable condition</li> <li>▪ Restoration and re-wetting of 35 hectares of blanket</li> </ul>	<p>The DPD should seek to protect (and enhance where possible) the Forest of Bowland AONB and other sensitive landscapes within Blackpool.</p>	<p>The SA Framework should include objectives that seek to ensure the protection and enhancement where possible of the Forest of Bowland AONB.</p>

**Regional and Sub-Regional Plans**

Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for DPD	Implications for SA
<p>In addition the plan includes many detailed objectives relating to:</p> <ul style="list-style-type: none"> <li>▪ The natural and cultural landscape</li> <li>▪ Enjoyment, health and wellbeing</li> <li>▪ The economy</li> <li>▪ The local community</li> <li>▪ Working in partnership</li> <li>▪ Responding to climate change</li> </ul>	<p>bog habitat (subject to funding availability)</p> <ul style="list-style-type: none"> <li>▪ Restore 10ha. of hay meadow</li> <li>▪ Restore and ensure management of 12 small species-rich grassland sites</li> <li>▪ Survey at least 10% of PRow within AONB per year</li> </ul>		

## Summary of Local Plans

Document(s)	Area of Potential Relevance	Description of Relevance to the Blackpool Local Plan Part 2 (including via the SA), Including Objectives
Lancashire Rights of Way Improvement Plan (2015- 2025)	Synergies with the plan (including potential mitigating influences)	The assessment sets out the adequacy of the rights of way and wider access network ('the Assessment of Need') and the 'Statement of Action' sets out how we will work with others to address the demands and needs identified in the assessment.
	Potential conflicts, issues or inconsistencies	Potential conflicts between runners, walkers, cyclists, horse riders etc as they have different needs and requirements.
	Baseline information of potential use	None
	Targets and objectives	To maintain the public rights of way network and other access by giving priority to those paths identified as being of greatest benefit to the greatest number of people and providing important links in the network.
Blackpool Local Plan Part 1: Core Strategy 2016	Synergies with the plan (including potential mitigating influences)	The plan sets out where new development such as housing, employment, retail and leisure should be located to meet Blackpool's future needs to 2027. The Strategy also identifies which areas within Blackpool will be regenerated, protected or enhanced; and sets out key development principles, for example design and affordable housing.
	Potential conflicts, issues or inconsistencies	Enabling development could conflict with wider plan objectives.
	Baseline information of potential use	None
	Targets and objectives	The Core Strategy will be used to determine planning applications and priorities for Blackpool over the 15 year plan period (2012-2027). However, it is likely to be reviewed before the end of this plan period, in whole or in part, to ensure that there are sufficient developable sites available for future needs. It may also need to be updated to respond to unforeseen changes.
Homelessness Strategy 2008-2010	Synergies with the plan (including potential mitigating influences)	A strategy and action plan to tackle homelessness and improve services and support for homeless and vulnerable people in Blackpool was produced. The development of the strategy was undertaken in partnership with public, private and third sector organisations and included plans for the prevention of homelessness, ensuring that there is sufficient temporary accommodation available to people who are, or who may become homeless and ensuring that sufficient support is available to people to prevent them becoming homeless again.
	Potential conflicts, issues or inconsistencies	Difficult to identify root cause of homelessness. Housing shortage is an issue.

Document(s)	Area of Potential Relevance	Description of Relevance to the Blackpool Local Plan Part 2 (including via the SA), Including Objectives
	Baseline information of potential use	None
	Targets and objectives	The overall aim of this new strategy is to prevent homelessness and to address housing need through housing options.
	Synergies with the plan (including potential mitigating influences)	This plan highlights several areas in which to improve existing and create new transport links within Blackpool
	Potential conflicts, issues or inconsistencies	Increase in air pollution and carbon emissions. Pedestrians may not be taken into consideration. Cross Boundary Issues.
<b>Blackpool Council Local Transport Plan 2011-2016</b>	Baseline information of potential use	Information about Blackpool Transport Networks
	Targets and objectives	Improve, maintain and make best use of Blackpool's transport network; in particular its roads, footways and bridges. Improve road safety by interventions that reduce the number of people, particularly children, killed and seriously injured on Blackpool's roads. Manage congestion levels on Blackpool's roads, especially where it impacts on local economic performance. Improve transport to and within the resort, particularly by more sustainable modes, to enhance the visitor experience and support the local economy. Improve the efficiency and management of parking to support the local economy, especially for shoppers and visitors. Improve access to healthcare, education, employment, shops, social/ leisure opportunities and resort attractions, particularly by sustainable modes.
<b>Blackpool Community Safety Plan 2012-2015</b>	Synergies with the plan (including potential mitigating influences)	This Community Safety Plan will build upon the Blackpool Community Safety Partnership 2012 Strategic Assessment which sets out the analysis of crime, disorder and substance misuse and has identified the priorities that are the greatest threat to local people and where successful interventions will improve the quality of life in Blackpool. These priorities are Domestic Abuse, Violent Crime, Substance Misuse – Drugs, Substance Misuse – Alcohol and Anti-Social Behaviour.
	Potential conflicts, issues or inconsistencies	May not have resourcing, money or numbers to increase police force and other authorities which are aimed to promote community safety.
	Baseline information of potential use	Crime data
	Targets and objectives	The Community Safety Plan which will deliver the key actions to reduce the harm / threat caused

Document(s)	Area of Potential Relevance	Description of Relevance to the Blackpool Local Plan Part 2 (including via the SA), Including Objectives
		by the identified issues. These issues are domestic violence, violent crime, substance misuse (Drugs), anti-social behaviour and substance misuse (alcohol).
<b>Blackpool Statement of Community Involvement (SCI) November 2014</b>	Synergies with the plan (including potential mitigating influences)	Encourages the community to get involved in local Blackpool decisions.
	Potential conflicts, issues or inconsistencies	All members of the public will have different opinions so it will be difficult to please everyone. By including the public in decisions may cause more negative attitudes towards things they disagree on.
	Baseline information of potential use	None
	Targets and objectives	To increase the level of participation in local Blackpool decisions within the community.
	Synergies with the plan (including potential mitigating influences)	This policy aims to increase levels of education within Blackpool
	Potential conflicts, issues or inconsistencies	Student engagement is important in order to increase place figures, but this could be tricky to carry out.
	Baseline information of potential use	None
<b>Blackpool Council School Organisation Pupil Place Plan 2015 - 2020</b>	Targets and objectives	<ul style="list-style-type: none"> <li>• The Local Authority's statutory responsibilities in ensuring there is sufficient provision of school places for young people within Blackpool;</li> <li>• The existing school provision within Blackpool;</li> <li>• Projected pupil place figures moving towards 2020 and beyond;</li> <li>• The methodology for forecasting and factors that influence the model;</li> <li>• Recommendations for ensuring sufficient school places and the Local Authority's strategic approach to manage the supply and demand for places over the life of this plan;</li> <li>• Statutory requirements and processes for making changes such as opening, closing or enlarging schools.</li> </ul>
<b>Blackpool Council Plan 2015-2020</b>	Synergies with the plan (including potential mitigating influences)	This plan aims to become the UK's number one family resort with a thriving economy that supports a happy and healthy community who are proud of this unique town.

Document(s)	Area of Potential Relevance	Description of Relevance to the Blackpool Local Plan Part 2 (including via the SA), Including Objectives
	Potential conflicts, issues or inconsistencies	It may be difficult to achieve the aim of becoming the UK's number one family resort when there is so much competition.
	Baseline information of potential use	None
	Targets and objectives	To maximise growth and opportunity across Blackpool To create stronger communities and increase resilience
	Synergies with the plan (including potential mitigating influences)	The plan seeks to build on the substantial investment that has been made in Blackpool over the past year. It aims to create a place where visitors can enjoy an experience that matches their expectation of a modern resort.
<b>Destination Management Plan 2015-2017</b>	Potential conflicts, issues or inconsistencies	The plan has lots of targets to achieve in a short space of time.
	Baseline information of potential use	None
	Targets and objectives	Retention of the resorts "golden core." Gradual elimination of poor quality accommodation and facilities Securing high-quality entertainment, attractions hotels, restaurants and leisure facilities
	Synergies with the plan (including potential mitigating influences)	The aim of Blackpool Town Centre strategy is to successfully regenerate the resort and to improve economic prosperity of the Fylde Coast.
<b>Town Centre Strategy 2013</b>	Potential conflicts, issues or inconsistencies	Main focus is on the town centre, doesn't take other areas of Blackpool into consideration.
	Baseline information of potential use	None
	Targets and objectives	<ul style="list-style-type: none"> <li>• Improve business confidence and encourage quality investment from private and public sectors</li> <li>• Inform future decision making and co-ordinate town centre initiatives to achieve complementary improvements</li> <li>• Assist with town centre promotion and marketing</li> </ul>
<b>Built Heritage Strategy 2016-2020</b>	Synergies with the plan (including potential mitigating influences)	This focus is of this strategy is to protect and enhance the historic built beginning with the Heritage Lottery Funded Townscape Heritage Initiative and culminating more recently with the

Document(s)	Area of Potential Relevance	Description of Relevance to the Blackpool Local Plan Part 2 (including via the SA), Including Objectives
		Designation Review programme.
	Potential conflicts, issues or inconsistencies	If the lottery fund is not renewed in the future it may be difficult to protect and enhance existing heritage assets.
	Baseline information of potential use	Information about different heritage sites within Blackpool.
	Targets and objectives	<ul style="list-style-type: none"> <li>To bring about and understanding of the significance of Blackpool's built heritage in a local, regional and national context and to create a framework of protection for these important assets.</li> <li>To bring about a general awareness of the meaning of 'heritage asset' in the context of the Strategy and to affirm the Council's commitment to protecting existing and potential assets that together comprise the built heritage of the town.</li> <li>To promote a general awareness of legislation, planning policy and the important responsibilities and roles of owners, the local authority and national bodies and organisations in built heritage matters.</li> <li>To promote active community participation in heritage issues and to encourage local groups already involved in heritage to offer practical support in delivering the objectives of the strategy by working in partnership with the Council and other agencies.</li> </ul>
<b>Health and Wellbeing Strategy 2012-2015</b>	Synergies with the plan (including potential mitigating influences)	This strategy sets a local framework for commissioning health, social care and broader wellbeing services. It will be a key driver towards meeting the overarching health and wellbeing outcomes of Blackpool Council and Blackpool Clinical Commissioning Group.
	Potential conflicts, issues or inconsistencies	None
	Baseline information of potential use	Contains a large amount of data relating to population and health.
	Targets and objectives	<ul style="list-style-type: none"> <li>Promote Healthy Lifestyles</li> <li>Promote Health and Social Care</li> <li>Promote a Wider Determinants of Health</li> </ul>
<b>Child Poverty Framework 2012-2015</b>	Synergies with the plan (including potential mitigating influences)	To give children an equitable chance to achieve their potential. This will be achieved by supporting their immediate needs, and providing an environment which allows them to raise their aspirations.



Document(s)	Area of Potential Relevance	Description of Relevance to the Blackpool Local Plan Part 2 (including via the SA), Including Objectives
	Potential conflicts, issues or inconsistencies	This document is slightly outdated and has similar objectives as the Children and Young People's Plan 2016-2019
	Baseline information of potential use	None
	Targets and objectives	<ul style="list-style-type: none"> <li>Remove barriers to children achieving their full potential through education, employment and other development opportunities</li> <li>Provide vulnerable children with appropriate support based around their needs.</li> <li>Ensure that young children have a healthy start to life.</li> <li>Build stable communities</li> <li>Improve the financial stability of families</li> <li>Embed actions to tackle child poverty in our work</li> </ul>
	Synergies with the plan (including potential mitigating influences)	This plan aims to make continuous improvements to young people's life.
Children and Young People's Plan 2016-2019	Potential conflicts, issues or inconsistencies	Overlapping objectives with the Child Poverty Framework 2012-2015
	Baseline information of potential use	None
	Targets and objectives	<p>Priority 1 – Keeping children and young people safe, preventing them entering the care and custody system wherever possible and ensuring there are safe and effective exit routes.</p> <p>Priority 2 – Improving the health, self-confidence and resilience of children and young people.</p> <p>Priority 3 – Maintaining Blackpool culture of high expectations and aspirations where attendance, participation and achievement for all are improved</p>
	Synergies with the plan (including potential mitigating influences)	A strategic document that demonstrates how the three local authorities of Blackpool Council, Fylde Council and Wyre Council and their partners work in collaboration to address key economic development issues across the Fylde Coast.
Fylde Coast Growth Accelerator Strategy 2016-2026	Potential conflicts, issues or inconsistencies	Seeks to accelerate growth across the whole coastal area not just Blackpool.
	Baseline information of potential use	None

Document(s)	Area of Potential Relevance	Description of Relevance to the Blackpool Local Plan Part 2 (including via the SA), Including Objectives
	Targets and objectives	<p>Priority 1: Jobs, Sites and Connectivity, focuses on those actions and projects that will act as the catalyst in enabling job creation and growth in our existing and future key economic sectors.</p> <p>Priority 2: Skills, Workforce Readiness and Business Support, focuses on those actions and projects that will equip residents and business to take advantage of new opportunities as they are generated.</p> <p>Priority 3: Urban Quality, Image and Marketing, focuses on the essential interventions required to ensure we develop a living offer that supports growth and the retention of talent, as well as tackling entrenched disadvantage and negative perceptions.</p>
Lancashire and Blackpool Flood Risk Management Strategy 2014-2017	Synergies with the plan (including potential mitigating influences)	This strategy aims to protect Lancashire and Blackpool from flood risks and identifies management strategies in order to protect the areas from flooding.
	Potential conflicts, issues or inconsistencies	Flood risk management methods could detract from the picturesque sites in Blackpool.
	Baseline information of potential use	Information has been used for the water section for the baseline.
	Targets and objectives	One of the key aims of this Strategy is to improve local flood risk management in a sustainable way. In other words, the risk of flooding must be reduced now, but in a way which does not compromise the interconnected needs of the economy, society and environment in the future.

<b>Report to:</b>	<b>EXECUTIVE</b>
<b>Relevant Officer:</b>	Alan Cavill, Director of Place
<b>Relevant Cabinet Member</b>	Councillor Mark Smith, Cabinet Member for Regeneration, Enterprise and Economic Development
<b>Date of Meeting :</b>	24 April 2017

## **REVIEW OF THE HOLIDAY ACCOMMODATION SUPPLEMENTARY PLANNING DOCUMENT (SPD)**

### **1.0 Purpose of the report:**

1.1 The Holiday Accommodation Supplementary Planning Document was originally adopted in March 2011 and provides detailed guidance on the Council's Core Strategy policy CS23 'Managing Holiday Bedspaces'. The Supplementary Planning Document includes the identification of Holiday Accommodation Areas (HAAs) where changes of use from holiday accommodation to residential use are generally resisted unless exceptional circumstances are demonstrated.

During 2016/17 a review was undertaken to assess the effectiveness of the Supplementary Planning Document after five years of operation and the continued appropriateness of the Holiday Accommodation Area boundaries having regard to any changes which have occurred since 2011.

This report presents to members the Blackpool Holiday Accommodation Supplementary Planning Document Review 2016/17 - Stage 1 Report which provides the full technical detail and evidence that has informed the review process and the Revised Holiday Accommodation Supplementary Planning Document – Consultation Draft which responds to the outcomes of the review.

### **2.0 Recommendation(s):**

- 2.1 To agree publication of the Blackpool Holiday Accommodation Supplementary Planning Document Review 2016/17 - Stage 1 Report on the Council's website (refer Appendix 3a).
- 2.2 To approve the Revised Holiday Accommodation Supplementary Planning Document – Consultation Draft for public consultation for a period of 6 weeks (refer Appendix 3b).

2.3 To delegate any minor drafting and textual changes to the Revised Holiday Accommodation Supplementary Planning Document to the Director of Place.

**3.0 Reasons for recommendation(s):**

3.1 To provide further detailed guidance to policy in the Blackpool Local Plan Part 1: Core Strategy to support Blackpool’s future regeneration and growth.

3.2a Is the recommendation contrary to a plan or strategy adopted or approved by the Council? No

3.2b Is the recommendation in accordance with the Council’s approved budget? Yes

3.3 Other alternative options to be considered:

As part of the review of the Holiday Accommodation Supplementary Planning Document alternative options have been considered as set out in the Blackpool Holiday Accommodation Supplementary Planning Document Review 2016/17 - Stage 1 Report (Appendix 3a to this report).

**4.0 Council Priority:**

4.1 The relevant Council Priority is:

“The economy: Maximising growth and opportunity across Blackpool”

**5.0 Background**

5.1 Holiday accommodation continues to be an important part of Blackpool’s tourism offer and is vital to the resort’s visitor economy.

5.2 The Holiday Accommodation Supplementary Planning Document was originally adopted in March 2011 and provides further detailed guidance on the Council’s Core Strategy policy CS23 ‘Managing Holiday Bedspaces’. This policy allows more hotels and guest houses to change to residential use than before, encouraging a better balance of quality homes and guest houses.

5.3 In order to successfully manage this reduction, and retain a suitable level of holiday accommodation in sustainable locations with easy access to the resort facilities and key transport routes, restrictions on change of use apply to properties located within the main holiday accommodation areas.

#### 5.4 Supplementary Planning Document Review 2016/2017

During 2016/17 a review has been undertaken to assess the effectiveness of the Supplementary Planning Document after five years of operation and the continued appropriateness of the boundaries having regard to changes which have occurred within the Holiday Accommodation Areas since 2011.

The Planning Strategy Team, supported by Envision consultants, has conducted the review so far. Full details of the review are set out in the Blackpool Holiday Accommodation Supplementary Planning Document Review 2016/17 - Stage 1 Report (Appendix 3a to this report) (hereby referred to as the Stage 1 Report).

To inform the review, a considerable amount of data was collected and analysed including land use, vacancies, planning applications/enquiries, enforcement cases, properties on the market and accreditation.

The analysis informs the Council that the number of holiday accommodation premises and bed spaces has decreased between 2008 and 2016. The total number of holiday accommodation bed spaces has reduced by 11,315 which is approximately 75% of the required reduction under Scenario 1 of the Humbert study (circa 15,024). In terms of Scenario 1, there is still a need to reduce the number of bed spaces by around 3700. It is estimated that there are 703 holiday accommodation premises outside of the current Holiday Accommodation Areas that can contribute to the reduction in holiday bed spaces.

The analysis also indicates that some of the holiday accommodation areas identified in the 2011 Supplementary Planning Document are experiencing pressure for change. Although the number of permissions granted since 2011 is small, a number of existing permissions were in place which have now been implemented together with a series of lawful development certificates. Furthermore a number of premises used as holiday flats have changed to residential without the requirement for planning permission. In some streets the greatest change is in the number of hotels and guest houses which have ceased trading.

- 5.5 The Stage 1 Report presents three options for consideration in taking the review of the Supplementary Planning Document forward, highlighting the benefits and risks of each option:

*Option 1: Minimal Change*

This option continues with the Supplementary Planning Document with updated amendments to the written text. The exceptional circumstances in relation to character and viability would remain. The current boundaries would be retained as set out in the adopted 2011 Supplementary Planning Document.

In addition to the general amendments required to the document wording to bring it up to date, further guidance will be provided on the viability assessment. Reference to a viability assessment template will be included which will set out the typical contents for such an assessment and the method by which it will be assessed.

In terms of benefits to this option, the Supplementary Planning Document text would be rewritten to better explain the purpose of the Holiday Accommodation Supplementary Planning Document and remove current misunderstandings. Retaining existing areas will maximise the Council's control of uses within them and continues to protect the most sustainable locations for holiday accommodation. Adverse business reaction would be minimised as some hoteliers consider the Holiday Accommodation Areas can help to galvanise the holiday accommodation community. The inclusion of viability test guidance will provide clearer direction to applicants.

However, this option does not address the issues of vacant and abandoned holiday accommodation in the Holiday Accommodation Areas because the exception test remains unchanged. It could lead to an increase in the number of vacant and abandoned properties as the strict character element of the exceptional circumstances criteria may still prevent unviable businesses from changing use with consequent impact on quality and character within all areas both on and off the Promenade. This option may also lead to adverse business reaction from businesses wanting their street to be removed wholesale from a Holiday Accommodation Area.

*Option 2: Selective Change*

The second option proposes to undertake the minor amendments to the text, as set out in Option 1, together with the introduction of the revised viability assessment. In addition, under this option a number of further changes are made:

- the requirement for redevelopment schemes on the Promenade to retain the quantum of holiday accommodation will be amended to allow flexibility;
- new exceptional circumstances criteria would be introduced which gives the Council a greater priority to allowing proven non-viable businesses to change use subject to a robust and transparent viability assessment.
- where justified amend the boundaries to the Promenade frontage where necessary to consolidate the existing holiday accommodation uses;

- amend the off the Promenade Holiday Accommodation Area boundaries based on the updated criteria assessment - removing those streets where significant change has been identified.

Amendments to the Holiday Accommodation Area boundaries could strengthen the remaining areas and assist in maintaining their long term integrity. The revised exceptional circumstances criteria would give greater emphasis to allowing proven non-viable businesses to change use with a redefined approach to alternative compatible use.

The proposed revision to boundaries maintains some control of use in reduced areas and should minimise the risk of successful applications or appeals for change of use. It will give individual business owners more flexibility in those streets that are removed from the Holiday Accommodation Areas.

However, there is an element of uncertainty to this option as the revised exceptional circumstances criteria could lead to an increase in planning applications demonstrating holiday accommodation use of a property is no longer viable. Further monitoring would therefore be required. There may be some adverse reaction from those holiday accommodation businesses removed from the Holiday Accommodation Areas.

#### *Option 3 – Radical Change*

This option would go further than Option 2 above and would involve the removal of all of the six off Promenade Holiday Accommodation Areas, with a concentration only on the Promenade properties within the designated Promenade areas. This option would therefore allow changes of use away from holiday accommodation in all of the Holiday Accommodation Areas off the Promenade.

In terms of benefits to this option, it would remove the confusion between those holiday accommodation businesses that are inside and outside the Holiday Accommodation Area boundaries and allow the market to take its course across the whole sector. It would allow any holiday accommodation business in the resort to change use to residential giving flexibility in business and personal life choices.

There are however a number of risks to option 3 including uncertainty regarding the precise impacts on Blackpool's housing market. It could lead to a rapid change in the holiday accommodation sector with a significant loss of holiday bed spaces beyond what is required undermining, the resorts visitor economy and wider neighbourhoods. There may also be adverse business reaction as some hoteliers value being included in a Holiday Accommodation Area. There may also be significant pressure on the resources of the Council's Planning and Enforcement teams. Further detail regarding the consideration of the options can be found in Section 8 of the Stage 1 Report.

## 5.6 The Way Forward

There are some important messages that are highlighted in the key conclusions of the Stage 1 Report. However the following points are considered to be of particular importance:

- In the first instance, as set out in the Humbert Study (Scenario 1) and referenced in the Core Strategy under CS23, there was a need to reduce the number of bed spaces in the Resort by around 15,024. Approximately 75% of the required reduction has already been met with the loss of around 11,315 bed spaces between 2008 and 2016, leaving around 3700 outstanding. It is important to note that the Stage 1 Report estimates outside the current Holiday Accommodation Areas, there are still 703 holiday accommodation premises which have the potential to convert to residential, assisting in meeting the need to further reduce holiday bed spaces.
- The Stage 1 Report also highlights a key issue around viability of holiday accommodation businesses and emerging signs of business stress in the Holiday Accommodation Areas. This is evidenced by the number of vacant/abandoned properties and a reflection of the strictness of the current exceptions test in the Supplementary Planning Document. The Report highlights that to continue with this approach is untenable and inequitable.
- Related to viability, is the quantum of holiday accommodation to be retained on the Promenade Frontages and that this has limited the opportunities for redevelopment on the Promenade and has been too restrictive.

Whilst the consultants in the Stage 1 Report on balance recommended option 2, they did note at paragraph 8.29 that in developing the options and considering the different elements of each option, the Council should be made aware that each option is not mutually exclusive and the Council may wish to adopt one option with elements from another.

In taking this into account it is considered that there is a hybrid option which responds to the key points highlighted above and combines elements of option 1 and 2 as set out below:

## 5.7 Hybrid Option

This hybrid option comprises:

- Proposed amendments to guidance relating to the Main Holiday Accommodation Promenade Frontages including removal of reference to retaining a fixed quantum of holiday accommodation
- Proposed amendments to the exceptional circumstances test allowing change



- of use within Holiday Accommodation Areas in certain circumstances including new guidance on the requirements of the viability assessment
- Proposed amendments to reflect the updated adopted Local Plan policy framework
  - Proposed amendments to text to improve the clarity of the Supplementary Planning Document
  - The current Holiday Accommodation Area boundaries would be retained as set out in the adopted 2011 Supplementary Planning Document

## 5.8 Justification for the Hybrid Option

The hybrid option would maintain maximum control over change of use to residential within the Holiday Accommodation Areas as it does not propose to amend any boundaries. It is considered, as highlighted in the Stage 1 Report, that those holiday accommodation properties located outside the Holiday Accommodation Areas would make a major contribution to the outstanding bed space reduction, where planning policy places no restriction on change of use to residential in principle to such properties.

The hybrid option would also maintain those locations which have been identified as the most sustainable spatially for businesses that form an important part of Blackpool's holiday accommodation offer.

This option recognises the issue of vacant and abandoned properties within the Holiday Accommodation Areas and proposes amendments to the exceptional circumstances test to allow proven non-viable businesses to change use to residential. The quality standard of these conversions will be controlled by the requirements set out in the New Homes from Old Places Supplementary Planning Document. To provide clarity for applicants, viability assessment guidance will be provided (which is not currently available), setting out the required information for such an assessment. This guidance (Appendix 4 of the Stage 1 Report) will be made available separate to the Supplementary Planning Document to ensure that it can be readily updated to reflect experience and changing circumstances.

Removing the requirement for redevelopment schemes to retain the quantum of holiday accommodation will allow flexibility for redevelopment and investment on the Promenade – the shop window to the resort.

In addition, it is important to consider the significant level of investment in regeneration projects, in the short to medium term of around £90 million. There is uncertainty around the impact of these regeneration projects on increasing visitor numbers and demand for overnight stays and hence the need to maintain the most sustainable spatial locations for holiday accommodation.

5.9 In summary the benefits and risks to the hybrid option are:

**Potential benefits**

- The amended text would better explain the purpose of the Holiday Accommodation Supplementary Planning Guidance and remove any current misunderstandings.
- Adverse business reaction would be minimised.
- Retaining existing areas will maximise the Council’s control of uses within them.
- Will provide clearer direction on the requirements of the viability assessment.
- Continues to protect the most sustainable locations for holiday accommodation.
- The revised exceptional circumstances criteria would give greater emphasis to allowing proven non-viable businesses to change use which could assist in reducing the number of vacant/abandoned premises in the Holiday Accommodation Areas
- Allows greater flexibility for redevelopment on the Promenade with the removal of the quantum holiday accommodation requirement.
- The text could be rewritten to better explain the purpose of the Holiday Accommodation and remove current misunderstandings.

**Potential risks**

- May lead to adverse business reaction from businesses wanting their street to be removed wholesale from a Holiday Accommodation Area.
- Uncertainty of the impact of the new exceptional circumstances criteria on the number of businesses lost in the Holiday Accommodation Areas due to non-viability.

Taking into account the above, it is recommended to take forward the hybrid option and the Supplementary Planning Document consultation draft has been amended accordingly to reflect this approach. However, in recognition of the analysis set out in the Stage 1 report, it is recommended that there is a need for continued careful monitoring of the Holiday Accommodation Areas undertaken on an annual basis to record any further changes that may occur which may influence a future review of the Supplementary Planning Document

The Revised Holiday Accommodation Supplementary Planning Document – Consultation Draft is set out in Appendix B based on the Hybrid Option. The document will be subject to public consultation for a period of six weeks commencing the beginning of May in accordance with the Local Plan Regulations and the Council’s Statement of

## Community Involvement.

In the Stage 1 Report the Consultants suggested a number of complementary actions. Whilst they recognise the Council has a multi-faceted approach to addressing the challenging issues in the inner areas and that the Council is under severe financial constraints, they advise the following for consideration:

- Commissioning further evidence, including:
  - business and property surveys to establish business health and property conditions; and
  - environmental audit of the inner resort area to develop a baseline understanding of the nature of environmental conditions as a basis for developing intervention actions.
- To develop intervention programmes/actions, including:
  - public realm improvements to the Holiday Accommodation Areas; and
  - business licensing scheme.
- A comprehensive approach to planning and housing enforcement.
- Continued monitoring of the New Homes from Old Places Supplementary Planning Document to understand its effectiveness in delivering high quality residential conversions
- Develop funding strategies, including lobbying Government and appropriate agencies.
- Develop a joined up approach across the Council and external agencies to coordinate investment and other actions to maximise benefits and avoid mistakes, e.g. locating sensitive uses within or adjoining the Holiday Accommodation Areas.
- Consider how other planning actions may assist including:
  - Article 4 direction dealing with change of use to House in Multiple Occupation;
  - Local Development Orders (LDO's), e.g. to allow certain development within the Holiday Accommodation Areas

5.10 Does the information submitted include any exempt information? No

### 5.11 **List of Appendices:**

Appendix 3a – Blackpool Holiday Accommodation Supplementary Planning Document Review 2016/17 - Stage 1 Report

Appendix 3b – Revised Holiday Accommodation Supplementary Planning Document – Consultation Draft

**6.0 Legal considerations:**

6.1 The Revised Holiday Accommodation Supplementary Planning Document provides additional information to assist with the interpretation and implementation of Policy CS23 'Managing Holiday Bedspaces' of the Blackpool Local Plan Part 1: Core Strategy which forms part of the Council's statutory Development Plan.

**7.0 Human Resources considerations:**

7.1 The Supplementary Planning Document is being resourced by existing staff within the Planning Strategy Team.

**8.0 Equalities considerations:**

8.1 No adverse equalities considerations. The Holiday Accommodation Supplementary Planning Document will contribute to the Council priorities set out in the Council Plan.

**9.0 Financial considerations:**

9.1 The work is being undertaken within existing budgetary provisions.

**10.0 Risk management considerations:**

10.1 The Revised Holiday Accommodation Supplementary Planning Document provides further detail to the Local Plan Part 1: Core Strategy (adopted January 2016) which provide the statutory planning framework to enable and assist the delivery of Blackpool's future development requirements. The Council needs to ensure that it has a planning framework that is managing the reduction of holiday bed spaces within the borough which reflects the community and elected members priorities and needs. The latter could lead to an increase in appeals if applications are received proposing development which is not in line with the priorities and needs of Blackpool.

**11.0 Ethical considerations:**

11.1 No adverse ethical considerations. The Revised Holiday Accommodation Supplementary Planning Document will contribute to the Council priorities set out in the Council Plan.

**12.0 Internal/ External Consultation undertaken:**

12.1 Consultation will be undertaken in accordance with the Council's Statement of Community Involvement and in accordance with the statutory requirements and regulations for Supplementary Planning Document preparation.

**13.0 Background papers:**

- 13.1 Holiday Accommodation Supplementary Planning Document (adopted March 2011)  
Blackpool Local Plan Part 2: Core Strategy (adopted January 2016)

**14.0 Key decision information:**

- 14.1 Is this a key decision? Yes
- 14.2 If so, Forward Plan reference number: 5/2017
- 14.3 If a key decision, is the decision required in less than five days? No
- 14.4 If **yes**, please describe the reason for urgency:

**15.0 Call-in information:**

- 15.1 Are there any grounds for urgency, which would cause this decision to be exempt from the call-in process? No
- 15.2 If **yes**, please give reason:

**TO BE COMPLETED BY THE HEAD OF DEMOCRATIC GOVERNANCE**

**16.0 Scrutiny Committee Chairman (where appropriate):**

Date informed: 12 April 2017 Date approved:

**17.0 Declarations of interest (if applicable):**

17.1

**18.0 Executive decision:**

18.1

**18.2 Date of Decision:**

**19.0 Reason(s) for decision:**

**19.1 Date Decision published:**

**20.0 Executive Members in attendance:**

20.1

**21.0 Call-in:**

21.1

**22.0 Notes:**

22.1

Envision



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# **Blackpool Holiday Accommodation SPD Review 2016/17**

## **Stage 1 Report**

**Final Draft  
March 2017**

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## 1.0 Introduction and the need for the review

- 1.1 The Blackpool Holiday Accommodation Supplementary Planning Document (HASPD) was adopted by Blackpool Council in March 2011. Supplementary Planning Documents (SPDs) set out more detailed information in support of existing policies contained in a Local Plan and are a material consideration when determining planning applications. Section 3 discusses the various planning policy documents in more detail.
- 1.2 The “Fylde Coast Sub-Region Visitor Accommodation Study”, published in 2009, sets the evidence context for planning policy in relation to the provision of visitor accommodation. The study, commonly referred to as the ‘Humbert Study’, considered the quality, quantity and location of visitor accommodation on the Fylde Coast. Through an assessment of the supply and demand of bed spaces in both serviced hotels and self-catering accommodation, it found that in 2008 there were around 57,000 bed-spaces in 1,657 serviced accommodation businesses (hotels, guest houses and B&Bs) in Blackpool.
- 1.3 The study found that even with a small increase in staying visitors as a result of resort regeneration (scenario 1), a minimum of 14,000 serviced accommodation bed-spaces and just under 1,000 self-catering accommodation bed-spaces would need to be lost to attain national average occupancy levels. This equated to a minimum reduction of approximately 430 holiday accommodation properties.
- 1.4 The study recommended that Blackpool pursue a significant reduction in the size of the resort neighbourhoods in an attempt to manage the reduction of holiday accommodation in the town and to ensure suitable levels of quality holiday accommodation are provided in the most sustainable locations. The HASPD therefore identifies areas both on and off the Promenade where existing hotels and guest houses cannot normally change to alternative uses including residential. The focus is to safeguard these locations for existing holiday accommodation use and support new or refurbished holiday accommodation, to improve the overall quality of supply and enhance the holiday character and appeal of these areas to support their long-term future. Change of use will generally be resisted within these areas, unless very exceptional circumstances around character and economic viability are demonstrated.

### Need for review of the HASPD

- 1.5 It was always the intention of the Council to undertake a review of the HASPD after five years of operation. The decision to undertake a review at this time is also consistent with the Local Plan Part 1: Core Strategy examination Inspector’s recommendation for an early review. The review will allow the opportunity to consider the following:
  - The effectiveness of the SPD after five years of operation.
  - The continued appropriateness of the boundaries having regard to changes which have occurred since 2011, such as land use, accreditation, physical condition etc.
  - The tests for exceptional circumstances to determine whether they are reasonable and effective, and to set out consistent guidance on viability test requirements.

- Update the SPD to take account of new national and local planning policy context.
- 1.6 The review is also an opportunity to consult with key stakeholders including business owners and local councillors regarding the scope of any revised SPD.
- 1.7 This first stage of the review will look at the following:
- The background to the HASPD including key evidence, the Fylde Coast Sub-Region Visitor Accommodation Study (Humberts) from 2009.
  - The policy context including the Blackpool Local Plan Part 1: Core Strategy (2016); the HASPD (2011) and the New Homes from Old Places Residential Conversion and Sub-Division SPD (2011).
  - Five years on since adoption of the HASPD in 2011, what the current evidence tells us and what people have told us (informal consultation in 2016).
  - An opportunity to look at experience from other seaside resorts and elsewhere including supplementary guidance, HMOs, and Article 4 directions.
  - What are the key issues.
  - The options available and our recommendations.

## 2.0 Background

- 2.1 Blackpool is England's largest and most popular seaside resort attracting more than 10 million visitors a year. The town grew rapidly at the turn of the 20<sup>th</sup> Century and in its heyday attracted around 17 million visitors each year and supported more than 100,000 holiday bed spaces.
- 2.2 Whilst Blackpool remains at the heart of the UK tourism and visitor economy, it has experienced a significant decline in visitor numbers from the 1980's onwards, a consequence of growing consumer affluence, enhanced consumer choice and perceived obsolescence of the town's visitor offer.
- 2.3 Whilst recent years has seen an upturn in resort visitor numbers in response to investment in Blackpool's infrastructure and offer, changes in the pattern and duration of visitor stays has resulted in a significant decline in the number of overnight visitors.
- 2.4 The decline in overnight visitors has led to an overprovision of holiday bed spaces in the resort. This has resulted in a significant number of B&Bs, guest houses, holiday apartments and hotels in the inner areas of Blackpool seeking alternative uses and conversions where possible to other uses primarily residential. This in turn has resulted in:
  - A significant oversupply of small, poor quality bedsits and flats or houses in multiple occupation (HMOs) with much of the building stock in poor quality condition and in need of investment.
  - A high proportion of the housing stock in the inner areas is in the private rented sector with a high proportion of people on housing benefit.
  - High levels of transience and significant problems regarding crime, anti-social behaviour, worklessness, poor health and low educational attainment.
- 2.5 Dealing with these issues, whilst retaining and supporting an appropriate level and quality of visitor accommodation is a major challenge for the Council and its partners. The current planning policy framework seeks to allow more hotels, guest houses and B&Bs to change to quality residential use (with limitations on conversion to smaller flatted units) than before whilst at the same time retaining an appropriate level of holiday accommodation in sustainable locations which have easy access to resort facilities and key transport routes. This approach seeks to encourage a better balance of quality homes and holiday accommodation supporting the visitor economy and the regeneration of the resort.

### Key Evidence Base

- 2.6 As outlined in the introduction the policy in the Core Strategy and the existing HASPD has been informed by the Humbert study (2009). This sets out the evidence context for planning policy in relation to the provision of visitor accommodation on the Fylde Coast. The three Fylde Coast Authorities of Blackpool, Fylde and Wyre commissioned Humberts Leisure to undertake the visitor accommodation study.
- 2.7 The study assessed the supply of bed spaces in serviced hotels and self-catering accommodation in relation to demand from staying visitors in the three boroughs. In Blackpool, it found in 2008 there were around 57,000 bed-spaces (25,000 bedrooms) in 1,657 serviced accommodation businesses (hotels, guest houses and B&Bs). Small hotels and guest houses dominated the Blackpool market, with just 16

businesses offering in excess of 100 bedrooms. In addition, it was estimated that there were just over 4,000 bed-spaces in self-catering accommodation and just under 5,000 bed-spaces on holiday parks.

- 2.8 The study also found that Blackpool's holiday accommodation sector was generally of a poor quality and that the stock was often well below the level expected by the modern-day visitor. Occupancy levels as a whole were well below national averages and many businesses were becoming increasingly unviable. The study found that even with a small increase in staying visitors as a result of resort regeneration (scenario 1), a minimum of 14,000 serviced accommodation bed-spaces and just under 1,000 self-catering accommodation bed-spaces would need to be lost to attain national average occupancy levels. This equates to a minimum reduction of approximately 430 holiday accommodation properties.
- 2.9 The study concluded that there was a clear oversupply of serviced hotel and non-serviced self-catering accommodation in Blackpool and that this was undermining the effectiveness of policy protection for the resort neighbourhoods. The resort neighbourhoods were designated in the Blackpool Local Plan 2006 and defined on the Blackpool Local Plan Proposals Map 2001/2016. Plan 1 shows the resort neighbourhoods and also has the current areas overlaid as defined in the HASPD in 2011.
- 2.10 The study recommended that Blackpool pursue a significant reduction in the size of the resort neighbourhoods. It suggested more tightly focussed resort neighbourhoods concentrating on the key hotels along the Promenade and upon the strongest remaining areas of guest houses and hotels in six other locations. These are identified as 'Key Promenade Hotel Frontages', 'Main Holiday Accommodation Promenade Frontages' and 'Main Holiday Accommodation Areas' and are shown on plans and described in the HASPD. These are explained in more detail in section 3 below.

## 3.0 Policy Context

- 3.1 As outlined in the introduction (section 1 above), the HASPD provides support and more detailed guidance on the current planning policy for holiday accommodation.
- 3.2 There are currently three key planning policy documents which deal with the issue of holiday accommodation in the town.
- a) The Blackpool Local Plan Part 1: Core Strategy, adopted in January 2016; and supplementary guidance as follows:
  - b) The Holiday Accommodation SPD adopted in March 2011; and
  - c) The New Homes from Old Places Residential Conversion and Sub-Division SPD adopted March 2011.

These are described in more detail below.

### a) Blackpool Local Plan Part 1: Core Strategy (adopted January 2016)

- 3.3 The Core Strategy sets out a number of relevant policies which will influence the revision of the HASPD. Policy CS12 refers to support for sustainable neighbourhoods; Policy CS21 refers generally to leisure and business tourism in the town; and Policy CS23 refers specifically to the issue of managing holiday bed spaces. Each of the main policies is summarised below with the justification behind them.

#### Policy CS12: Sustainable Neighbourhoods

- 3.4 This states at point 2: “that neighbourhood regeneration and improvement will focus on: Neighbourhoods within the inner area, including the mixed holiday and residential neighbourhoods of North Beach, Foxhall and South Beach, and the predominantly residential neighbourhoods of Claremont, Talbot and Brunswick, Revoe and St Heliers. To support development and investment in these neighbourhoods the Council will address the problems and challenges associated with poor quality housing and unauthorised residential use through wider housing, planning and enforcement initiatives, including: a) Opportunities for selective intervention to improve the quality and mix of existing housing stock, and b) Providing assistance with site assembly where required to facilitate major redevelopment schemes, including the selective or comprehensive redevelopment of key sites.”
- 3.5 This policy recognises that the mixed use holiday areas form part of wider inner area neighbourhoods. These neighbourhoods face significant issues relating to imbalanced communities, housing mix, environmental quality, poor public realm, lack of green infrastructure, including open space and private gardens, high levels of transience, lower levels of education, high benefit dependency.

#### Policy CS21: Leisure and Business Tourism

- 3.6 Point 1 of this policy states: “In order to physically and economically regenerate Blackpool’s resort core and town centre, the focus will be on strengthening the resort’s appeal to attract new audiences year round. This will be achieved by supporting (selected): b) Proposals for new visitor accommodation focused on the town centre, resort core and defined holiday accommodation areas, unless exceptional circumstances justify a peripheral location outside these areas, d) The

improvement of existing holiday accommodation and giving marginal, lower quality guest houses the opportunity to convert to high quality residential accommodation outside the defined holiday accommodation areas, and e) New development along the promenade's built frontage which complements the high quality public realm investment along the promenade to enhance the appearance of Blackpool's seafront."

- 3.7 This policy together with policy CS23 provides the main policy context for the review of the HASPD. It sets out the context for continued investment in new visitor accommodation focused on the town centre, resort core and defined holiday accommodation areas, whilst recognising the need for improvement to existing accommodation and allowing conversion to high quality residential use outside the defined holiday accommodation areas.

### Policy CS23: Managing Holiday Bed Spaces

- 3.8 This policy states: "To achieve an economically viable level of quality holiday accommodation, the following approach will be adopted to manage a reduction in the oversupply of poor quality holiday bed-spaces:

1) Within the main holiday accommodation areas defined in the SPD:

a. Existing holiday accommodation use will be safeguarded and new or refurbished holiday accommodation will be supported

b. Change of use from holiday accommodation, or the loss of sites used, or last used, as holiday accommodation, will be resisted unless:

i. Exceptional circumstances are demonstrated in accordance with the SPD, or

ii. In relation to a promenade frontage, the proposal would provide high quality holiday accommodation alongside a supporting new residential offer. Such proposals would need to comply with the requirements of the SPD.

2) Outside the main holiday accommodation areas:

a. Where existing holiday accommodation is viable its retention will be supported, including measures to improve the quality of accommodation

b. Change of use from holiday accommodation to permanent residential use will be permitted where proposals provide high quality homes which comply with the Council's standards for conversions or new build, and relate well in use, scale and appearance to neighbouring properties.

3) Within the key promenade hotel frontages defined in the SPD, holiday accommodation use will be safeguarded and appropriate measures to enhance the character and appearance of existing hotel buildings and frontages will be supported, to help sustain the long term future of the resort."

- 3.9 This is the key policy providing the context for the HASPD. Policy CS23 allows more guest houses to change to residential use than before, encouraging a better balance of quality homes and guest houses. In order to successfully manage this reduction and to ensure suitable levels of quality holiday accommodation are provided in the most sustainable locations, the policy approach is to identify main holiday accommodation areas (through a Holiday Accommodation SPD) where existing



hotels and guest houses cannot normally change to alternative uses including residential. These areas will generally be focused within the defined Resort Core, as shown on the Key Diagram, although may include some areas beyond this boundary as appropriate.

- 3.10 Within these areas, the focus is to safeguard existing holiday accommodation use and support new or refurbished holiday accommodation, to improve the overall quality of supply and enhance the holiday character and appeal of these areas to support their long-term future. Change of use of holiday accommodation to alternative uses, including residential, or the redevelopment of sites in use, or last used, as holiday accommodation for alternative uses, will generally be resisted unless very exceptional circumstances around character and economic viability are demonstrated. Details of the defined holiday accommodation areas (including precise boundaries) and demonstrating exceptional circumstances are set out in the HASPD.
- 3.11 Sections of the promenade are included within the main holiday accommodation area in recognition of its important contribution to Blackpool's holiday accommodation offer. It is the resort's shop window and many of Blackpool's largest hotels are located here. Despite past decline in visitor numbers and some underinvestment in businesses and properties, the promenade remains the prime location for holiday accommodation.
- 3.12 Within the main holiday accommodation areas on the promenade, whilst the focus is to support new or refurbished holiday accommodation, the policy also allows appropriate mixed-use developments providing high quality holiday accommodation/residential uses. Such developments would need to meet high standards of design and deliver clear regeneration benefits (full details of these requirements are set out in the HASPD).
- 3.13 Having smaller areas means that a greater number of hotels and guest houses are now located outside the main holiday accommodation areas. This holiday accommodation remains part of the resort offer and the retention of viable businesses will be supported, including measures to enhance the quality of existing accommodation. However, the policy gives property owners the option to change to residential use should they no longer want to remain as a hotel or guest house. Enabling more hotels and guest houses to change to residential use will encourage a better balance of quality homes and guest houses, providing that future change of use proposals are properly managed and create good quality housing for Blackpool residents. Therefore, all new residential uses must meet the quality standards set out in design guidance for residential conversions and sub-divisions (the 'New Homes from Old Places SPD'). This will help to improve Blackpool's housing offer and transform these neighbourhoods into successful communities.
- 3.14 The policy approach set out in the new Core Strategy is in response to the Humbert study recommendations to allow a managed reduction of holiday accommodation in the inner resort areas. It has 4 principal aims:
  1. Identifying clusters of holiday accommodation in appropriate locations along the key promenade and inner resort areas which should be retained and within which change of use will be resisted (to be set out in a HASPD);
  2. Allowing new development along the promenade which complements the high quality public realm investment to enhance the appearance Blackpool's seafront;
  3. Encouraging investment in existing holiday area accommodation and new high quality accommodation in suitable locations focussed in the town centre,

resort core and defined HAAs unless exceptional circumstances justify a peripheral location outside of these areas;

4. Allowing more holiday accommodation to change use outside the main holiday accommodation areas to high quality residential use (with appropriate standards to be set out in supplementary guidance – currently the New Homes from Old Places SPD).

## Supplementary Planning Guidance:

### b) Blackpool Holiday Accommodation SPD (2011)

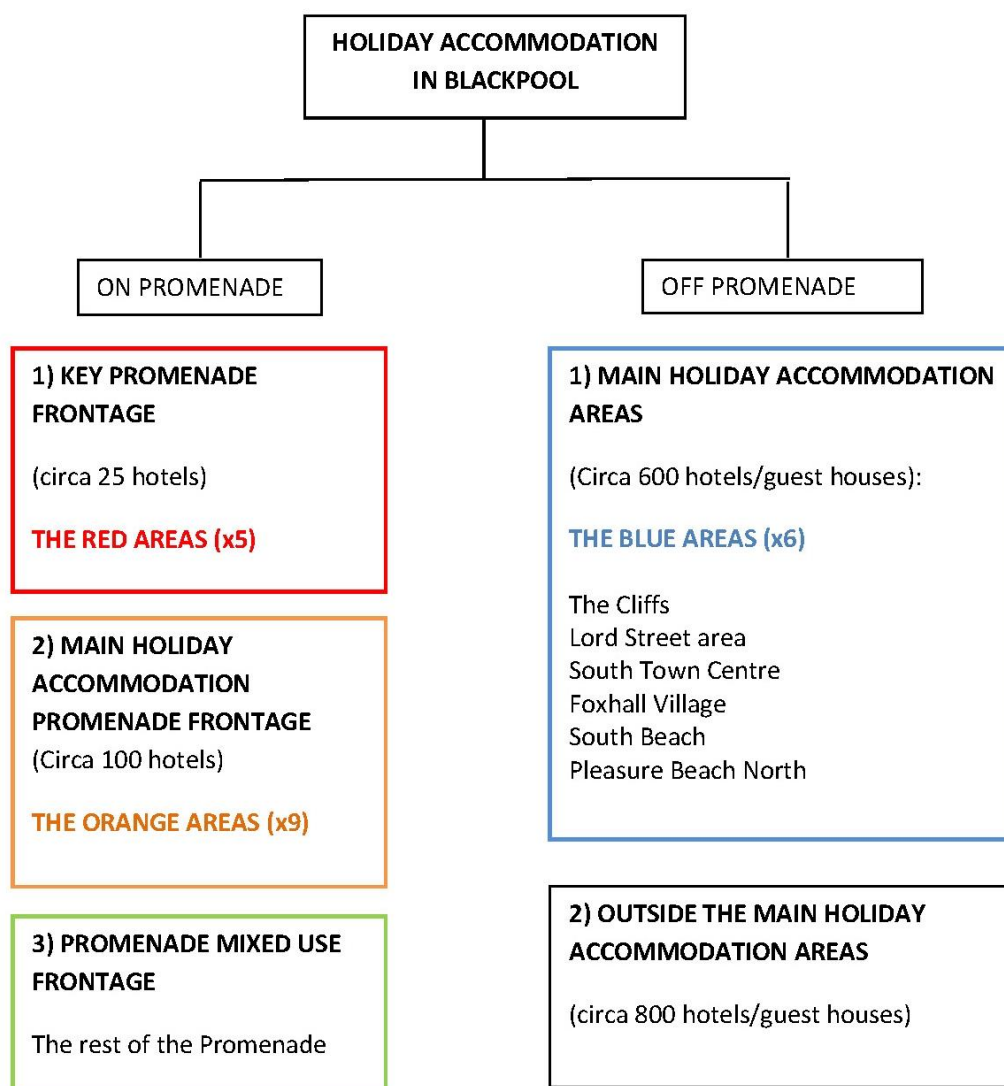
- 3.15 The HASPD, adopted in March 2011, was based on the previous Core Strategy Preferred Option (April 2010) policy context.
- 3.16 The key aims of the HASPD were to:
- support an improvement in quality and reduction in quantum of holiday accommodation which consolidates provision around the strongest clusters;
  - maintain the Promenade as the ‘shop window’ to the resort, offering a range of high quality visitor accommodation;
  - provide a high quality holiday accommodation offer in the following six defined areas: the Cliffs, Lord Street, South Town Centre, Foxhall, South Beach and the Pleasure Beach; and
  - encourage mixed neighbourhoods outside of the main HAAs, complemented by a New Homes from Old Places SPD (parts of which have now been superseded by the national housing technical housing standards – nationally described space standards) that provides guidance on residential conversions and seeks to prevent properties being used as HMOs.
- 3.17 The HASPD defines holiday accommodation area boundaries for the Promenade, including key hotel frontages containing a number of the resort’s largest and best known hotels and the main promenade frontage, and six other main HAAs off the Promenade. Broad areas for holiday accommodation were initially identified in the Fylde Coast Visitor Accommodation Study, but the more detailed boundaries were subsequently determined and agreed by the Council as part of the SPD process including extensive consultation with hoteliers and other stakeholders. The original boundaries were drawn based on:
- detailed land use and building condition surveys with the aim of identifying robust concentrations of holiday accommodation within areas with a strong holiday accommodation character and
  - an assessment of their perceived viability and attractiveness.
- 3.18 In establishing the promenade boundaries the HASPD aimed to retain the quantum of holiday accommodation and also referred to the intrinsic architectural character and appearance for the key frontage locations. Off the promenade 10 general criteria were set out. These covered: strategic evidence, such as the Humbert Study and Blackpool Local Plan; neighbourhood evidence such as quality and accreditation; local character such as location, scale and quantity; and the future, such as viability and attractiveness.
- 3.19 The HASPD makes it clear that the character is quite diverse within the town. Drawing up the boundaries involved both the perceived viability and attractiveness as

well as use of the then current facts and figures regarding use, property type, and the accommodation provided. The criteria are reviewed and reassessed in Chapter 7 of this report.

3.20 To reduce the quantum of holiday accommodation and to consolidate provision around the strongest clusters, the main off Promenade HAAs in the HASPD were made smaller than the Resort Neighbourhoods that were identified in the Local Plan (adopted 2006). It was considered that these areas in the 2006 plan were drawn too widely and retained too many holiday accommodation premises that were no longer meeting the requirement of today's visitor. The Resort Neighbourhood areas are illustrated on Plan 1.

3.21 The HASPD aims to resist changes of use from holiday accommodation to other uses within the defined areas. Figure 3.1 below illustrates in simple terms how the HASPD is structured in terms of the physical sub division of areas. In this report for ease of identification we have used the terms "red areas", "orange areas" and "blue areas" as these are reflected on all of the supporting plans.

**Figure 3.1: Structure of the HASPD**



## On Promenade

- 3.22 Blackpool's promenade (from the Norbreck Castle hotel in the north to the Solaris in the south) stretches for over 8.3kms (5.2 miles). It includes large and small hotels, key attractions such as the Tower and Pleasure Beach, holiday flats, residential accommodation and a range of other commercial premises. It is mixed use in character and the red and orange areas identified in the HASPD cover approximately 50% of the total promenade frontage and represent some 125 hotels.
- 3.23 The **key hotel frontage** (red areas) is easily identified and stretches from Queens Promenade to Talbot Square and comprises 5 frontages including large hotels such as the Cliffs, the Imperial, the Grand Metropole and the Talbot Square Ibis Styles. Here the emphasis is on safeguarding the existing hotels, retaining their intrinsic architectural character and value, as well as enhancing the character and appearance.
- 3.24 The **main holiday accommodation promenade frontage** (the orange areas) covers a larger area and includes 9 separate frontages from the Norbreck Castle Hotel in the north down to the pleasure beach frontage in the south. The emphasis is on retention of the quantum of existing floorspace but also to allow redevelopment and improvement proposals that provide a high quality mixed use holiday accommodation and residential offer.

## Off Promenade

- 3.25 Off the promenade the HASPD identifies 6 **main holiday accommodation areas** (the blue areas). The policy approach in these areas is to safeguard existing holiday accommodation use. Changes of use from holiday accommodation to permanent residential will only be permitted in very exceptional circumstances where properties fundamentally differ in character and it would be without any detriment to the character of the holiday accommodation area, with an assessment required indicating that the building is not viable for future holiday use.
- 3.26 Outside the defined blue areas the emphasis is on creating balanced residential neighbourhoods. Here it was estimated in 2011 that there were some 800 hotels/guest houses in operation. Existing holiday accommodation with or seeking accreditation is supported but the main emphasis is to allow changes of use away from holiday accommodation to residential.

## c) New Homes from Old Places SPD (2011)

- 3.27 In order to improve Blackpool's housing offer and transform Blackpool's inner neighbourhoods into successful communities, the New Home from Old Places SPD was produced with the aim of improving the quality of residential conversions. All conversions to residential uses must meet the quality standards set out in the SPD which includes dwelling sizes, floor space, amenity space and design best practice.

## National Planning Policy Framework

- 3.28 The National Planning Policy Framework (NPPF) sets out national guidance for plan making and for making decisions on planning applications. The guidance in relation to the economy is relevant in developing planning policy for Holiday Accommodation as follows: Para 19 states that "the Government is committed to ensuring that the

planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth”.

- 3.29 Para 20 states that “To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.
- 3.30 Para 21 states that “Investment in business should not be over-burdened by the combined requirements of planning policy expectations. Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing.
- 3.31 In drawing up Local Plans, local planning authorities should:
- support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;
  - plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;
  - identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and
  - facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.

### Determining applications

- 3.32 Para 197 states that “In assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development.”
- 3.33 Para 200 states “The use of Article 4 directions to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the wellbeing of the area.
- 3.34 Para 203 states “Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations”

### Ensuring viability and deliverability

- 3.35 Para 173 states “Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable.
- 3.36 “Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

## 4.0 Five years on - what the evidence tells us

4.1 As part of this review of the SPD, a variety of evidence has been gathered to understand what is happening in the HAAs at present and to determine any changes that have occurred since the SPD was adopted in 2011. This has included:

- site surveys looking at land use, levels of vacancy and street character
- analysis of planning enquiries, planning applications and enforcement cases
- identification of holiday accommodation properties on the market
- identifying the location of accredited holiday accommodation.

4.2 This information will be used to establish the key issues to consider when developing options for the future of the HASPD and the precise boundaries. This chapter is subdivided based on the information gathered as follows:

a) Detailed analysis of the number of bed spaces and premises

b) Current situation within the HAAs relating to:

- i) Land use
- ii) Planning evidence (pre-application enquiries, planning applications and enforcement cases)
- iii) Holiday accommodation on the market
- iv) Trading levels
- v) Accreditation
- vi) Street Character
- vii) Changes occurring without the need for planning permission including Lawful Development Certificates (LDCs)

c) Areas that are under pressure for change based on the evidence gathered.

### **a) Detailed analysis of the numbers of bed spaces and premises**

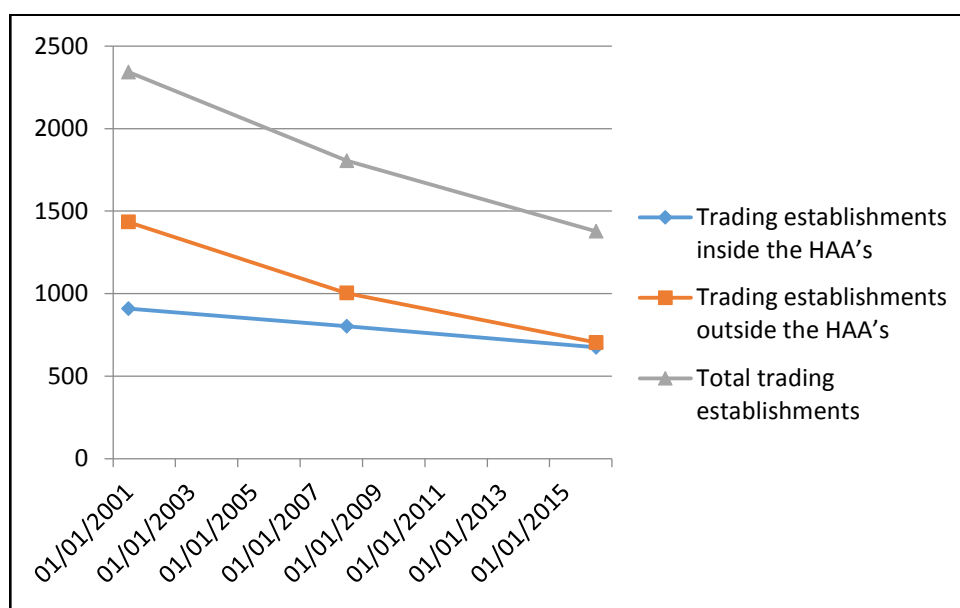
4.3 In 2009, the Humbert study referred to a clear 'oversupply' of holiday accommodation in the town. From 2,342 holiday accommodation premises identified in 2001 (Accommodating change: Planning for the future of areas of older holiday accommodation in Blackpool, CURS January 2002), Humberts identified 1,805 premises in their research during 2008, representing a 23% reduction over some 7 years. Under their scenario 1 (representing a small increase in visitor numbers based on resort regeneration) it stated that a minimum of 14,149 serviced accommodation bed spaces and approximately 875 self-catering accommodation bed spaces would need to be lost to attain national average occupancy levels, equating to a minimum reduction of approximately 428 holiday accommodation properties. It is also worth noting that Scenario 2 (marginal decrease in staying visitor numbers) referred to a much greater loss of 23,636 bed spaces and some 660 premises, and Scenario 3 (a significant decrease) went even further and referred to a loss of some 27,354 bed spaces and 761 premises.

4.4 This section of the report uses up-to-date evidence gathered to establish the loss of bed spaces and premises that has occurred since 2008.

### Establishing a 2008 baseline for comparison

- 4.5 To establish a comparable baseline it is necessary to analyse data post 2008 and compare with the known data within the defined areas for 2016. The methodology we have used to make this comparison is explained in more detail in Appendix 1.
- 4.6 In summary this analysis suggests that in 2016 there are currently approximately **674** trading holiday accommodation premises (both hotels and self-catering) in the defined areas and approximately **703** outside, a total of **1,377**, representing an overall reduction of 24% in the 8-year period since 2008 (approximately 16% in the defined areas and 30% outside).
- 4.7 Furthermore, using the 2001 CURS data, comparisons can be made for 2001, 2008 and 2016 to illustrate the change that has taken place over the past 15 years, as illustrated in Figure 4.1 below.

**Figure 4.1: Graph showing decline in the number of trading holiday accommodation premises**



- 4.8 In addition to the number of premises, previous studies have also referred to the total number of bed spaces. Current data suggests a total of 49,400 bed spaces in Blackpool in 2016 representing a reduction of 11,315 (18.6%) since 2008 (60,715 minus 49,400), approximately 75% of the required reduction under scenario 1 (circa 15,024).

## b) Current Situation within the HAAs

### i) Land Use

- 4.9 Up to date information is available on the current land use in each of the HAAs, both on and off the Promenade, based on a detailed survey conducted in November 2015, refreshed and checked during 2016. Plans 2a-2f show the current (2016) land use in

each of the defined areas together with data on ‘accreditation’ and ‘on the market’. As outlined above it was estimated in 2011 that there were some 725 ‘hotel premises’ located in the defined HAA’s. Current data suggests a total figure in 2016 including self-catering holiday flat accommodation of 674 (628 hotels/guest houses and 46 self-catering holiday flat premises) which are currently trading and 108 which are not trading (98 hotels/guest houses and 10 self-catering holiday flat premises), a total of **782**. Table 4.1 below illustrates the breakdown by area (Red, Blue, Orange) and includes other uses such as commercial and residential.

**Table 4.1: Land Use 2016**

HASPD Area	H/GH T	H/GH NT	HF T	HF NT	COM	RES	DEM	Totals
Red	20	1	0	0	1	0	0	<b>22</b>
Orange	88	16	8	0	19	21	3	<b>155</b>
Blue	520	81	38	10	10	157	4	<b>820</b>
<b>Totals</b>	<b>628</b>	<b>98</b>	<b>46</b>	<b>10</b>	<b>30</b>	<b>178</b>	<b>7</b>	<b>997</b>

*Key: H/GH T = hotel /guest house trading; H/GH NT = hotel/guest house not trading; HF T = holiday flats trading; HF NT = holiday flats not trading; COM = commercial; RES = residential; DEM = Demolished*

#### *ii) Planning Evidence*

- 4.10 The HASPD places controls on changes of use so as to maintain the concentration of holiday accommodation uses in the areas identified. This section looks at how the SPD has worked in practice and any changes that have occurred post adoption of the HASPD in March 2011.

#### Planning Applications

- 4.11 Five planning applications for conversion to residential use have been approved in the HAAs since the adoption of the SPD in March 2011. These relate to one property in each of 5 separate HAAs, all off the promenade in the blue areas (South Beach, Foxhall, North Town Centre, South Town Centre and Pleasure Beach). There were exceptional circumstances demonstrated in each of these cases, and they represent a very small change within the areas.
- 4.12 Some 11 applications for conversion to residential use have been refused in the HAAs, 3 of which went to appeal, but none of the appeals were successful. In each case the Inspector supported the approach in the SPD and considered the change of use from holiday accommodation to residential would be detrimental to the character of the HAA with no exceptional circumstances being demonstrated.

#### Pre-application Enquiries

- 4.13 Since March 2011 the Council’s planning department has recorded 36 pre-application enquiries for change of use from holiday accommodation to residential in the HAA’s. Table 4.2 below shows where these enquiries have occurred. Pre-application enquiries illustrate an appetite for conversion to residential and may indicate businesses are struggling.



**Table 4.2: Planning Enquiries for Change of Use, post 2011 adoption**

HASPD Area/location	No. of Enquiries
Norbreck and Bispham Promenade frontage (Orange area)	1
South Promenade Frontage (Orange area)	4
Pleasure Beach Promenade Frontage (Orange area)	2
North Town Centre	2
Foxhall	3
South Town Centre	15
South Beach	8
Pleasure Beach	1
<b>TOTALS</b>	<b>36</b>

- 4.14 Enquiries along the promenade are minimal (7) but within the HAAs, South Town Centre and South Beach have seen the most activity. In the South Town Centre the most enquiries were in Hornby Road, Reads Avenue and Palatine Road. In South Beach, Woodfield Road has seen the most activity.

### Enforcement Cases

- 4.15 Planning enforcement is used when breaches are made such as a change of use which has not been approved through a planning application. Since 2011, there have been some 101 enforcement cases relating to permanent uses in the defined areas. These are summarised in Table 4.3 below. Two enforcement notices and one breach of condition notice have been served, all in the blue areas, but in the majority of cases either no action was taken, there was no control, or they were not expedient to pursue. 45 cases remain ongoing.
- 4.16 This high level of enforcement activity reflects some of the underlying issues in the HAA's, and in particular in the areas away from the Promenade. Although lawful change, through permissions, has been relatively small, as indicated above, changes are happening on the ground which are not strictly lawful. Common examples include holiday flats being used as permanent flats; and hotels taking in permanent guests or operating as a house in multiple occupation (HMO).

**Table 4.3: Planning Enforcement Activity in the HAAs post 2011**

HASPD area	NA	NC	NE	ON	RE	NS/BC	Totals
Red	0	0	0	1	0	0	1
Orange	0	5	1	3	6	0	15
Blue	5	24	1	41	11	3	85
<b>Totals</b>	<b>5</b>	<b>29</b>	<b>2</b>	<b>45</b>	<b>17</b>	<b>3</b>	<b>101</b>

Key: NA = No action taken; NC = No control; NE = Not expedient; ON = ongoing; RE = resolved; NS/BCN = enforcement/breach of condition notice served

### Summary of Planning Evidence

- 4.17 The above data clearly indicates that, in terms of planning applications, the level of change within the defined areas since the HASPD adoption in 2011 has been relatively small. However the number of pre-application enquiries and in particular the level of enforcement cases clearly indicates an underlying issue within some of the

HAAAs with hoteliers expressing an interest to change to residential and in some cases taking in permanent residents. This is a potential indication that some businesses are struggling.

- 4.18 A number of existing permissions have been implemented after the adoption of the HASPD but these related to earlier consents assessed against the previous planning policy. There have been 3 appeals against refusal of planning permission within the off Promenade HAAs but none of these were successful as the inspectors did not agree that a suitable case had been made and that the change would affect the character of the area.
- 4.19 Based on the evidence collected, the policy, to restrict change in the defined areas, is being effective. Change outside the defined areas has however been much greater. The number of applications for conversions is higher and there have been many more approvals as was the intention of the existing HASPD and Local Plan policy approach. This change outside the HAAs will be analysed in more detail in part d of this section of the report.

### iii) Holiday Accommodation on the Market

- 4.20 Data is available on the number of properties on the market in 2016 (October) together with consistent data over a 5-year period since the adoption of the HASPD in 2011. Plans 2a-2f show all properties currently on the market. From discussions with local agents it is quite normal for about a quarter of all properties to be on the market at any particular point in time. This does not necessarily reflect that they are failing and could be due to a whole range of factors including retiring owners or opportunity sales.
- 4.21 Evidence as shown in Table 4.4 below illustrates that overall 24% of properties in the HAAs are on the market. There are currently 5 properties on the market on the key promenade frontage, 21 (24%) on the main promenade frontage and 162 (24%) in the main HAAs off the promenade. 24% of those on the market in the blue areas have been on the market for over 5 years, since the SPD was adopted.

**Table 4.4: Hotels on the market (October 2016)**

HASPD area	Over 5 years on the market	between 2 and 5 years on the market	between 0 and 2 years on the market	Total on the market now
Red	0	1	4	5
Orange	4	8	9	21
Blue	39	43	80	162
Outside the HAAs	12	18	46	76
<b>Totals</b>	<b>55</b>	<b>70</b>	<b>139</b>	<b>264</b>

- 4.22 Agents have indicated that typically the value of a property is based on the freehold (non-trading) value, plus the value of the goodwill as perceived by the market. Typically this is 1 to 1.5 times the net adjusted profit/earnings before interest, tax, depreciation and amortisation (EBITDA) plus an element for the in situ value of the trade fixtures and fittings. The market has not changed significantly for some time and there is currently little lending into this sector. It is understood that banks are not keen on lending within the town generally and properties offered at auction are often failing to attract bids. In terms of the freehold non-trading values these vary typically

from £5,000 - £10,000 (based on a per bedroom rate) and have been as low as £3,000. For example, a 10 bedroom guest house could be sold for as little as £50,000.

- 4.23 The annual occupancy rate for some guest houses is as low as 25%-30% per annum and competition for tariffs means that the turnovers are modest and the net adjusted profits are often very poor representing a yield (by reference to the turnover) of 3-4% where the market would normally expect 12-18% for commercially traded hotels. However, properties do continue to sell as they operate as a “home with income”, with purchasers factoring in the cost of their own accommodation. Agents have indicated that re-establishing a failed or closed down guest house business is unlikely.

#### iv) Trading Levels

- 4.24 There are examples of non-trading holiday accommodation premises across the HAAs, with some streets experiencing higher levels than others. The key promenade frontages contains 21 hotels, only one of which is not trading. There has been more change in the main promenade frontage (Orange area) with some 14.3% no longer trading. The main HAAs off the promenade (blue areas) show 14% as no longer trading but there are significant differences when looking at individual areas as illustrated in Table 4.5 below.

**Table 4.5: Distribution of trading and non-trading properties**

Hotels and self-catering	Trading	Not Trading	Total Holiday Accomm Properties	% no longer trading
Red Areas	20	1	21	4.8%
Orange Areas	96	16	112	14.3%
Blue Areas	558	91	649	14%
<b>Total</b>	<b>674</b>	<b>108</b>	<b>782</b>	<b>13.8%</b>
Most notable changes in the blue areas:				
Foxhall	31	11	42	26%
North Town Centre	42	10	53	19%
South Town Centre	252	40	292	13.6%
South Beach	115	20	135	15%

- 4.25 Within the blue areas off the promenade the biggest change has been in Foxhall (26% no longer trading). The analysis in Appendix 3 also looks at the areas on a street by street basis to highlight anomalies within the areas themselves. Some streets now contain a mix of uses and are no longer predominantly in holiday accommodation use.

#### v) Accreditation

- 4.26 There are two national accreditation schemes in place for visitor accommodation; Visit England and the AA. Both work to the same set of standards. Accreditation levels within the town are relatively low given the high number of serviced accommodation. Up to December 2016 data shows there are a total of 189 accredited holiday accommodation properties in the town. Approximately two thirds of those accredited are in the defined areas. Plans 2a-2f show all those accredited both within the defined areas and just outside. Half of the trading hotels in the key

promenade frontage (red areas) are accredited, whereas that figure drops to 19% within the main promenade frontage (orange areas). Within the HAAs off the promenade (blue areas), only 16% are accredited. Overall some 17% of those trading are accredited. Outside the HAAs it is estimated that only 10% are accredited (71 out of approximately 703 premises).

- 4.27 However, it should be noted that the increase in use of online booking websites and recommendation sites such as TripAdvisor, is considered by hoteliers to influence visitors in their choice of accommodation without the need for formal accreditation.

#### vi) Street Character

- 4.28 As part of the evidence gathering, a qualitative assessment of street character was made during the detailed site surveys with the aim to establish those streets which exhibit a particular holiday character that is worthy of safeguarding.
- 4.29 The assessment looked at various aspects that contribute to the overall character of a street including: building height / scale / style, uniformity / rhythm, landscaping / greenery and general upkeep of properties. A summary of the positive and negative aspects was made, identifying elements of the street's character that strengthens holiday ambience.
- 4.30 The assessment has identified a variety of characters from the quieter more residential holiday character of King Edward Avenue to the busy commercial holiday character of Albert Road and Hornby Road.

#### vii) Changes occurring without the need for planning permission

- 4.31 A number of permanent residential properties are evident within the HAAs and these are identified in the land use survey. Some of these have lawfully occurred without the need for planning permission, as a result of historic permissions for holiday flats that did not include a condition restricting the use to holiday flats only. Therefore, these flats can be used as either holiday or permanent accommodation and in many cases are small, one bedroomed flats or bedsits. There are now a number of private landlords that are exploiting this loophole and acquiring these properties for rental purposes, in many cases accommodating people on housing benefit, many with chaotic lifestyles. This has led to issues including anti-social behaviour which impacts on hoteliers and their guests in the surrounding area.
- 4.32 Relating to this issue, eight Lawful Development Certificates for residential use have been approved in the HAAs since 2011 – this is formal recognition that a particular use is lawful. Examples include holiday flats being used as permanent flats without a restrictive condition as discussed above and residential uses that have become lawful after a certain length of time.

#### c) Areas under pressure for change

- 4.33 As outlined above there has been some change in the defined areas between adoption of the HASPD in 2011 and 2016. Some areas have changed more than others, and although the number of permissions granted since 2011 is small, a number of existing permissions were in place which have now been implemented together with a series of lawful development certificates. Furthermore a number of premises used as holiday flats have changed to residential without the need for

planning permission. In some streets the greatest change is in the number of hotels and guest houses which are currently not trading.

- 4.34 In some cases the non-trading hotel/guest houses operate effectively as a home for the owners. The premises may also be used for some longer term tenants. There have also been cases where former hotels/guest houses have become derelict, are boarded up and in some cases have been damaged by fire.
- 4.35 In addition to the above, planning enforcement activity illustrates the pressures being placed on certain areas where there is unlawful activity taking place. Not all such unlawful activity is documented as there may be activity that the Council has not been made aware of and as outlined in Section 5 below, the planning enforcement team deals with a large number of cases each year.
- 4.36 To enable a more detailed assessment of the HAAs, we have reassessed all of the areas on a street by street basis in Appendix 3 of this report. This considers all of the data currently available and highlights those areas where change and pressure for change is occurring and this has directly informed the recommendations set out in Section 8.

## 5.0 What people have told us

5.1 As part of the review of the HASPD we have undertaken informal consultation with a range of people including representatives from the Council (both officers and members), stakeholders such as hoteliers, and commercial estate agents.

5.2 The views expressed are listed in Appendix 2, unedited, and are subdivided into the following subject areas:

General views on the current position in the HAAs

Specific planning issues

Perception of the market

Specific issues and concerns going forward: i) HMOs; ii) Anti-social behaviour

Comments on complimentary actions: i) Licensing; ii) Other initiatives/programmes

Site and area specific comments

5.3 We have not attributed comments to individuals but they have been grouped into general themes/issues to illustrate the range of views. There was some consensus but in general terms it is accepted that the issues faced by the town are much wider than just the planning policy issues and the potential solutions are both wide ranging and complex.

### a) General views on the current position in the HAAs

5.4 It is recognised that there has been a continued decline in the inner area of the town and there are still a high number of life expired guest houses. It was broadly agreed that on the face of it the policy has been successful in limiting change within the defined areas, however, all is not often what it seems to be, with what appear to be guest houses from the front with signs and sun rooms, but behind they are operating as an HMO or they are a marginal/unviable business and effectively a home with income.

5.5 It is accepted that Blackpool experiences some complex social and economic issues and land use planning policy is only one solution component and other complimentary actions are required. It is therefore difficult to separate the HAAs from the wider housing and benefit issues which inner Blackpool faces.

5.6 There was general agreement that failed businesses within the HAAs are an issue as are unlawful HMOs. Some of the larger prominent hotel closures, such as those along the Promenade, are a great cause for concern as the damage to Blackpool's reputation has already been done. HMOs and poor quality cheap guest houses are ruining the market for everyone else. Similarly, boarded up former guest houses and hotels do not give the right image for Blackpool. It was also pointed out that technology has changed how bookings are made with less "door knocking" and telephone bookings with a major increase in online bookings (such as booking.com), use of smart phones, recommendations and observations on sites such as trip advisor etc.

5.7 There is more recent evidence of long term hoteliers going out of business and old guest houses either being boarded up or being run by inappropriate people.

5.8 There is a general feeling that HAAs can work and are a good means of protection. Some fought hard for inclusion in 2011 and would not want to see the HAAs significantly eroded or removed. Some also felt that removal of the HAAs completely

would be a disaster in that no planning control would be in place to prevent changes of use to residential. The HAAs can help to galvanise the holiday accommodation community.

- 5.9 Where residential conversions have taken place within HAAs without the need for planning permission (previously discussed in Chapter 4 section vi), there is significant concern over their quality. In a lot of cases the quality is poor and the lack of outside space, servicing arrangement, car parking etc does not encourage the right type of housing mix. Residential use for most people in the HAAs means HMOs. Many would rather live next door to a vacant property than a poor quality residential use. There is also a general concern about the introduction of residential uses into the HAAs. Some felt the two uses cannot operate side by side, others suggested the demand within the private owner occupied and rented sector is very weak particularly for family homes and 2-bedroom accommodation and that the main demand is for 1 bedroom accommodation.
- 5.10 It was broadly accepted that the issues experienced in Blackpool with regard to HMOs are unlike other English resort areas due to the overall scale. Hoteliers are generally fed up with HMOs, both lawful and unlawful and the time it can take to resolve the problems caused by them such as anti-social behaviour. The general feeling expressed by those consulted was that uses such as HMOs are incompatible within the HAAs and they erode the core activity of guest houses and can change streets forever. However, where high quality single residential uses have met all planning requirements, it can sometimes work but one HMO alone can bring down a whole street.

#### b) Specific planning issues and perception of the market

- 5.11 It is recognised that the Council has not approved many changes of use within holiday accommodation areas, and it has been difficult to meet the exceptional character and viability tests outlined in the HASPD. There is little guidance for applicants on the issue of viability.
- 5.12 A major problem across all the HAAs has been the use of holiday flats as permanent flats where planning permission has not been required. A number of historic permissions for holiday flats did not include conditions restricting the use to holiday flats only. Therefore the flats can be used as permanent or holiday accommodation. In many cases these flats are small, one bed roomed or bedsits. As a result there are now a number of landlords that are exploiting this loophole and operating residential blocks in the HAAs with very small self-contained flats (bedsits) where the overall quality of accommodation is relatively poor. This has led to other issues including anti-social behaviour which impacts on hoteliers and their guests in the surrounding area.
- 5.13 The Council's planning enforcement team are struggling to deal with all of the current cases and there is an issue with conversions which have not fully complied with the conditions for removal of the holiday related elements, including sun lounge and rear accommodation for owners.
- 5.14 There is a general acceptance that there is still an oversupply of holiday accommodation in the resort. The market has not changed significantly for some time and we are still in decline and performance is poor. Generally, people want a better quality, however, pricing is an issue as prices are generally depressed. Hotels which are currently empty cannot be sold due to lack of lending from the banks, but do have

requests for purchase for a family homes which is not permitted in the HAAs. There is little lending into this sector, banks have a poor appetite for it and properties offered at auction are often failing to attract bids. Agents do not envisage any significant changes in the micro or macro market due to the current over-supply.

- 5.15 There is anecdotal evidence from the agents contacted that deals have broken down on premises outside the HAAs as there is a perceived view that you have to be in the HAAs. Once a hotel/guest house fails it is difficult to re-establish the business. It is recognised that the stock is ageing, most of it being mid/late Victorian and as a result the cost of repairs and renewals is proportionately high.
- 5.16 It was felt that the HAAs need to keep as many holiday accommodation uses as possible for them to work effectively. The introduction of housing has often not worked due to limited parking, no gardens etc and tenants attracted to the properties has led to cases of anti-social behaviour.
- 5.17 A major problem is occupancy rates and tariffs with some annual occupancy rates being as low as 25%-30% per annum. Competition for tariffs means that the turnovers are modest and the net adjusted profits are often very poor representing a yield (by reference to the turnover) of 3% or 4% where the market would normally expect 12%-18% for commercially traded hotels. The lack of income also affects the owner's ability to invest in the fabric of the building, leading to a further deterioration of the buildings.
- 5.18 Many guest houses operate as a "home with income" with purchasers factoring in the cost of their own accommodation. However, there are some long established hotels with good profit levels which reinvest, acquire adjoining units and promote. There are some very good operators including coach contract operators mainly from Scotland.

### c) Comments on complementary actions

- 5.19 The Council operates a number and range of licensing schemes in the town some of which affect the HAAs. In Blackpool there are only 160 "high risk" HMOs that fall into the mandatory category, however, just for comparison, there are only 6 in Fylde. In inner Blackpool there are 13,000 properties of which more than 50% are private rented.
- 5.20 The licensing schemes enable the Council to employ anti-social behaviour officers and with more schemes the Council has been able to employ more people and that can make a real difference on the ground. Plan 5 illustrates the areas covered by the licensing and the overlap with the HAAs.
- 5.21 A scheme has been successfully operated in South Beach area (covering a wider area than the HAA) and for HMOs there is mandatory licensing where the landlord must get a licence. There are plans for further schemes which will affect properties in the HAAs.
- 5.22 There was a general acceptance that there needs to be some form of local "quality control" on holiday accommodation businesses both in terms of management proficiency and standards of provision.



#### d) Site and area specific comments

- 5.23 A number of comments were made about specific areas and properties. These related to specific issues such as HMOs, both lawful and unlawful, enforcement cases and actions, and poor quality physical environment.

#### Summary of views

- 5.24 Although the views expressed at this stage of the review are informal they do cover a range of issues and further emphasise the problems faced by the existing HAAs. It is accepted that the holiday accommodation market is still weak, occupancy levels are low, and there is still an oversupply of hotels and guest houses in the town. Property values are depressed but it is important to note that some businesses are still doing well.
- 5.25 Blackpool's problems are complex and land use planning policy is only one element. The restrictive planning land use policy which has been operated through the HASPD since its adoption in March 2011 has been effective but there have been some changes in the HAAs and one of the main concerns is around the introduction of residential uses, often in HMOs, both lawful and unlawful, and the resultant anti-social behaviour which is damaging the HAAs. Also a key message was that the outward appearance of hotels and guest houses does not always tell the true story of what is going on behind the front doors.
- 5.26 Mixed views have been expressed on the compatibility of residential uses with HAAs, however, everyone accepts that conversions need to be of a high quality if they are to be introduced, and other complementary actions such as licensing, need to be put in place to ensure standards and controls are maintained in the HAAs.

## 6.0 Experience from other seaside resorts and elsewhere: supplementary guidance; HMOs; and Article 4 directions

6.1 By way of comparison we have taken the opportunity to look at other guidance available elsewhere in the UK. We have already looked at the change since 2011 in the key areas affected by the HASPD, and this provides an opportunity for comparison and a look at best practice from elsewhere.

6.2 We have looked at and analysed the following:

- a) Torbay Holiday Accommodation Guidance 2009
- b) East Yorkshire Planning for Tourism Guidance 2011
- c) Scarborough Houses in Multiple Occupation SPD 2015
- d) Brighton and Hove Article 4 Direction for HMOs 2012
- e) Hastings Retaining Hotels and Guest Houses Study 2009
- f) Hastings Retaining Visitor Accommodation SPD 2015
- g) Bournemouth Tourist Accommodation SPD 2016
- h) Manchester Article 4 Direction for HMOs 2010

### a) Torbay Holiday Accommodation Guidance 2009

6.3 This 'interim' guidance dates back to 2009 (although policy controls originate from 1980s) and the now superseded Local Plan which had two policies for controlling the re-use and development of holiday accommodation, one relating to premises within 'Principal Holiday Accommodation Areas' (PHAAs) and the other to holiday accommodation elsewhere.

6.4 The guidance was produced at a time when a new Local Plan approach was being formulated and an intention that the strictest control over any changes affecting holiday accommodation would relate to the 'Core Tourism Investment Areas' (CTIA's) - the very 'best' (top 20%) of the former PHAAs (as stated in the adopted Local Plan in 2015). Here, unless they are demonstrated to be unviable, the presumption is that all hotels and guest houses irrespective of size would be retained as service holiday accommodation and occupancy conditions on holiday apartments will be unlikely to be relaxed for them to be used for housing.

6.5 The underlying basis for the guidance is an intention to reduce the number of small and marginally located holiday accommodation to better match falling demand whilst promoting and focussing on the best areas including intended Council investment here.

6.6 A total of three categories of PHAAs were originally identified with progressively greater allowances for changes from holiday accommodation as a traffic light system.

6.7 The recently adopted Local Plan has one policy that covers proposed changes affecting holiday accommodation. In addition to the viability test the policy also refers to the prospect of allowing non-holiday uses (in CTIA's) in circumstances where the existing accommodation lacks 'an appropriate range of facilities and scope for improvement'.

6.8 The emphasis outside the CTIA's in both the guidance and the new Local Plan is that the larger the holiday accommodation the more control will apply to allowing other

uses. Factors leading to allowing other uses are: not undermining the character and range of facilities and accommodation in the local area; viability considerations (particularly for larger establishments) and whether there would be regeneration or other benefits.

- 6.9 There remains a presumption first set out in the guidance and old Local Plan, repeated in the new Local Plan, against small apartments and HMOs being permitted anywhere where they would 'conflict with the tourism character and offer'. There is also an ongoing intention to promote the improvement of former holiday accommodation through the removal of unsightly extensions and the provision of appropriate facilities for residential conversions.
- 6.10 Neither the guidance nor the new Local Plan offer much advice on what will be taken account of in viability assessments except the 'degree to which properties have been marketed'. Neglect or under investment will not, 'on their own', be sufficient reasons for allowing non-tourism uses.
- 6.11 In common with the old Local Plan the new Local Plan has a policy on HMOs which aims to control the concentration and quality of conversions. In respect of the former, planning applications in the top 20% most deprived Super Output Areas (SOA) or where HMOs make up more than 10% of the housing stock in a SOA or more than 20% of the street, are unlikely to be permitted. The Local Plan refers to the Centre for Social Justice report 'Turning the Tide' (2013) which refers to disadvantage in five seaside resorts including Blackpool.

#### b) East Yorkshire Planning for Tourism Guidance 2011

- 6.12 This guidance is mainly targeted at developing and diversifying the tourism offer through new quality accommodation that will broaden the year round appeal of the area's resorts. The main concentration of service holiday accommodation is Bridlington where the large quantity of cheap accommodation is seen as having a drag effect on holding back new hotel investment; an identified need.
- 6.13 The Bridlington Area Action Plan (2013) supports conversions of guest houses back to housing uses, particularly for families. Avoiding high concentrations of HMOs in the town centre is seen as an issue but no particular initiatives are referred to.

#### c) Scarborough Houses in Multiple Occupation SPD 2015

- 6.14 This 2015 guidance is focused on achieving sustainable, inclusive and mixed communities, and impacts on residential amenity rather than any impacts on tourism. The SPD through a 'Supplementary Policy' aims to control the concentration, clustering and sandwiching of family houses, as well as the amenity impacts of HMOs and sets out a series of quite limiting maximum thresholds for numbers (10% of the local area 100m radius whilst a reference to other towns around the country shows many places use higher acceptable maximum thresholds up to 35%) and distribution of HMOs at the very local level such as over short lengths of street 100 to 200m. It also refers to an additional Licensing Scheme aimed at smaller HMOs (3 + occupants) for 5 years in certain parts of the town (including holiday areas). This initiative was prompted by a belief that welfare reform changes would lead to more pressure for HMOs.

#### d) Brighton and Hove Article 4 Direction for HMOs 2012

- 6.15 The reason put forward for this Direction was to control the concentration of HMOs in established residential areas (rather than tourism accommodation areas) by requiring planning applications to be submitted for changes of use from C3 (dwelling houses) to C4 (HMOs), therefore there is no impact on tourism. The local situation has also been made worse by a high demand for student accommodation.

#### e) Hastings Retaining Hotels and Guest Houses Study 2009

- 6.16 This consultants' study was prompted by a concern about losses of tourist accommodation (rather than what they would change into) because the Council wanted to increase the number of staying visitors and attract higher spending markets. The Local Plan at the time (adopted 2004) had a policy (T4) which allowed the change of use of tourist accommodation if there was detailed evidence that the 'building' is no longer viable and the (re-use) proposal would result in a major upgrading of the structural condition of the premises.
- 6.17 There is a good housing market in Hastings, and new hotels are considered lower in value than housing, office and other commercial uses. Despite the Council's ambitions, the study noted that 'it is difficult to see a future for poor quality tourist accommodation making little profit especially when the operators are not investing or having little aspiration to up-grade or re-position' (in the market). The study recognises that commercial acumen and how the business has been financed are key considerations in terms of establishing whether the existing operation is viable. The study also warns the council that further new budget hotel accommodation will further weaken the financial positions of poorly run guest houses.
- 6.18 There is reference to Bournemouth's approach of comparing the operation with what an 'average competent operator' would be able to achieve in terms of running a tourist accommodation business.
- 6.19 The study briefly refers to the possibility of a partial loss of rooms and to allow for the financial returns from this revenue source to be put into investment in the remainder of the hotel, as controlled by a legal agreement.
- 6.20 The study recognises that LPA's have a limited understanding of the commercial operation of hotels and that a database of key performance information would assist them to get to the crucial position of being able to assess the potential trading performance of the accommodation being considered rather than assessing the costs that are peculiar to the current owner.
- 6.21 A whole range of assessment factors are suggested but the study recognises that a wide range of agencies would need to be involved in supplying and checking the information – the headline factors set out are:
- Location – is it a priority for tourism activity?
  - Accommodation offer – range of facilities and standard
  - Development potential – potential for upgrading or repositioning of offer
  - Historic/current trading performance – over last 3 years
  - Management approach
  - Marketing – attempts to attract room bookings
  - Prospects of sale as a going concern

- Viability – in current form or capability if better run and property improved

#### f) Hastings Retaining Visitor Accommodation SPD Draft 2015

- 6.22 The number of serviced visitor bed spaces in Hastings reduced from 8,000 in 1951 to 1,000 in 2015 but in recent years the number of visitor stays has increased slightly and the Council considers there is a shortage of quality accommodation.
- 6.23 The draft SPD contains guidance for assessing applications away from holiday accommodation picking up most of the 2009 study factors for assessment:
1. Location – suitability of area for tourism use
  2. Evidence of being marketed for sale for at least 2 years
  3. Evidence of business planning and performance against targets
  4. Evidence of advertising for room bookings
  5. Evidence of any capital improvement by the present owner
  6. Evidence of the management experience of the present owner/manager
  7. Profit and loss account
  8. Evidence of physical condition of building, estimates of cost of any significant repairs and impact these would have on future viability of the business
  9. Evidence of scope for refurbishment, costs and viability impact
  10. Evidence of market value in present condition, after repairs and after refurbishment if required
  11. Evidence of whether the premises could be converted to other tourist accommodation e.g. language school (which appear to be prevalent in Hastings)

All 11 factors apply to accommodation with 4 or more guest bedrooms, only 1, 2 (1 year marketing) 7 and 8 apply to smaller accommodation.

#### g) Bournemouth Tourist Accommodation SPD 2016

- 6.24 The Council see Bournemouth as a premier tourist destination offering first class visitor facilities but aiming for wide appeal across all socio-economic groups. Loss of tourist accommodation is only allowed anywhere in the District where the holiday accommodation use of the property is no longer viable and where changes of use would not harm the tourist function of the area. The Authority no longer operates a differential policy in specific area zones. The Council is trying to 'match availability accommodation to the demand in different locations and to segments of the tourism market'.
- 6.25 There is recognition that some tourist accommodation needs upgrading but there is still a healthy demand and some indications of institutional investment in hotels and serviced apartments as well as growth in boutique hotels.
- 6.26 As part of a pre-application process the Council offers a screening service provided by a panel of industry experts and the Council for a fee. This normally meets every 2 months and assesses proposals on the basis of limited information as to whether a full viability assessment is required for a change of use application from tourist accommodation. Failure to use this service means that a full viability assessment is required when the application is registered.
- 6.27 The SPD contains the screening and full viability forms/information required. The screening service is considered particularly helpful to small and life style businesses.

The emphasis is on establishing potential trading performance rather than the existing or previous (if not trading) performance.

- 6.28 Self-catering and service flatted accommodation is presented as an acceptable fall back from hotel and guest house uses. Residential use may be accepted if there is an appropriate element of tourist accommodation. HMOs are unlikely to be accepted in tourist areas because they are 'incompatible with existing character of such areas and would adversely affect the functioning of other tourist businesses'.

#### h) Manchester Article 4 Direction for HMOs 2010

- 6.29 This Direction was made in October 2010, confirmed after consultation in January 2011 and came into force in October 2011. The national change in permitted development rights in 2010 prompted the designation. It covers the whole of the City Council area. The overall reason given was the harm that would be caused to the sustainability of neighbourhoods over the long term. Also a report by Ecotec for Government 'Evidence Gathering – Housing in Multiple Occupation and Possible Planning Responses, 2008' was cited. It listed the following impacts of HMOs:

- Anti-social behaviour
- Imbalanced and unsustainable communities
- Negative impacts on the physical environment and streetscape
- Pressures on parking provision
- Increased crime
- Growth in private rented sector at the expense of owner occupation
- Pressure on local community facilities
- Restructuring of retail, commercial services and recreational facilities to suit lifestyles of the predominant population

- 6.30 The Council report referred to local instances across these impacts. In 2010 there were over 50,000 students living in Manchester many in HMOs which were spreading across the southern parts of the city. There were also increasing numbers of young professionals living in HMOs. It was decided to cover the whole city with a Direction so that the distribution of HMOs was not merely dispersed to other areas within Manchester.

#### Key lessons

- 6.31 Our research has found that no other local authority is dealing with the scale of oversupply of holiday accommodation that is found in Blackpool, nor the challenges of housing market dynamics.
- 6.32 Other than Torbay there are no other authorities which control the loss of holiday accommodation through defined holiday accommodation areas. Torbay has a range of areas: Core areas which are the most important; Amber Zones which are more peripheral and retain some holiday character; and Green Zones which retain little holiday character. Within the red and amber zones there are varying degrees of control and viability testing depending on the number of bedrooms.
- 6.33 A number of local authorities set out clear viability guidance for holiday accommodation businesses. This differs from the Blackpool SPD where currently no guidance is given on the viability criteria required to be submitted. The Bournemouth Tourist Accommodation SPD 2016 sets out detailed viability assessment template

which would be a useful starting point for improved guidance for Blackpool. It is also interesting to note that Bournemouth offers a screening service as part of a pre-application process to consider the viability of businesses without a full viability assessment for smaller businesses. In Hastings less onerous viability requirements are required to justify change of use for smaller businesses of 4 or less rooms.

- 6.34 As with Blackpool's HASPD, the Hastings SPD also requires justification that the character of the area has changed but is less onerous than the "character test" in Blackpool.

## 7.0 Key issues

7.1 Based on the evidence which has been collected as outlined in Section 4 of this report and the initial informal views expressed in Section 5, the review of the HASPD needs to cover the following key issues:

- a) the current holiday accommodation market;
- b) pressure for change in the HAAs, both on and off the Promenade;
- c) appropriateness of the criteria used to determine the HAAs off the Promenade in the SPD;
- d) the quantum of holiday accommodation on the Promenade;
- e) appropriateness of the exceptional circumstances tests;
- f) the need for complementary controls and actions.

### **a) the current holiday accommodation market**

7.2 The HASPD has been adopted for five years. In that time both the number of holiday accommodation premises and the total number of bed spaces has continued to reduce. Current data suggests that since 2008 the total number of holiday accommodation bed spaces has reduced by 11,315 which is approximately 75% of the required reduction under scenario 1 of the Humber study (circa 15,024). In terms of Scenario 1, there is still a need to reduce the number of bed spaces by around 3700. This is affecting the overall market whereby:

- values are low;
- the stock is ageing;
- lending is restricted and investment is limited;
- occupancy levels can be as low as 30% with consequent impacts on business income and investment into businesses and premises;
- some businesses are failing;
- the physical environment of some streets in the defined HAAs is deteriorating within the defined areas, particularly some streets off the Promenade, and in their wider neighbourhoods and;
- there is little or no current financial assistance available in the areas.

7.3 There is little future for poor quality tourist accommodation making little profit which inhibits the ability for operators to invest up-grade or re-position themselves within the market.

7.4 As intended by the planning policy strategy underpinning the HASPD, the level of change outside the HAAs has been much greater, mainly due to there being no restriction on changes of use away from holiday accommodation, unlike inside the defined areas. This supports the aim of the policy approach to have a concentration of holiday accommodation in a limited number of sustainable locations in the town, both on the Promenade and in the areas immediately adjacent to it.

7.5 The data suggests the land use changes approved through the planning application process inside the defined areas since 2011 are minimal, however, there is some caution in using the figures alone to assess the change. We have been made aware that a number of properties, particularly the smaller guest houses, are operating simply as homes for the owners or homes with income (possibly paying guests, even in some cases permanent tenants).



- 7.6 Also within the areas a number of businesses are now no longer trading, have closed down and are either boarded up or are now simply providing accommodation for the owners. It is recognised that re-establishing a failed business is extremely difficult and costly. These issues in the HAAs, both on and off the Promenade, are further compounded by unlawful activity such as unlawful HMOs, and non-compliance with planning conditions. There are a number of ongoing enforcement cases and despite the Council's efforts the impact of such activity can have a negative impact on the HAAs.
- 7.7 There is a need for the quantum of holiday bed spaces to reduce further in the resort. As previously highlighted in Section 4 of this report the Humbert study indicates that under Scenario 1 around 428 properties need to be lost and some 15,024 bed spaces. The updated figures suggest that around 428 properties have been lost however, the bed space figure is still in excess BYaround 3,700. This would indicate that in general terms smaller hotel properties with fewer bed spaces have been removed from the holiday accommodation sector. In view of the continued oversupply of bed spaces, the current approach in the SPD should therefore be reviewed to take account of the need for further reductions.

#### b) pressure for change in the HAAs both on and off the Promenade

- 7.8 The current policy in the HASPD restricts changes of use from holiday accommodation to permanent residential use in the HAAs. This change is generally resisted unless exceptional circumstances around character and economic viability are demonstrated. Evidence shows that business owners have not been successful at demonstrating exceptional circumstances and viability tests have not been submitted to prove existing businesses are no longer viable.
- 7.9 Currently there is no guidance in the HASPD to inform potential applicants as to what information should be included in the viability assessment when submitting an application for change of use in the HAAs and no information on the method by which it will be assessed.
- 7.10 Through the planning application process, change has been minimal in the HAAs. However, the character of some streets within the HAAs have succumbed to change outside the planning process, holiday flats being used as permanent flats without a restrictive condition. Some areas are under more pressure than others. There are also a number of enforcement cases where the principal use is now residential and not a holiday flat, guest house, B&B etc.
- 7.11 Where changes have occurred in a street, decisions will need to be made on the benefit or otherwise of the continued inclusion of the street in the HAAs. This is explored further in our options and recommendations in Chapter 8.
- 7.12 In terms of properties on the market, generally this appears to be within the levels expected (around 25%), although some streets experience levels above this average.
- 7.13 A clear monitoring strategy is required to record any further changes taking place in the HAAs.

#### c) the appropriateness of the criteria

- 7.14 The HASPD sets out 10 broad criteria to assist in the selection of the HAAs off the Promenade, covering strategic, neighbourhood and local evidence. These are set

out in Figure 7.1 below. On reviewing the criteria, it is considered that additional clarity is needed to ensure the criteria are easy to understand, are linked to the known data, and to remove any overlap of information.

**Figure 7.1: General Criteria, Adopted HASPD, March 2011**

General Criteria	
Strategic Evidence	1. Quantum range of future bed space requirements set out in the Fylde Coast Visitor Accommodation Study, based on anticipated visitor numbers, occupancy and viability.
	2. The rationale for individual Promenade and holiday accommodation areas as informed by the Fylde Coast Visitor Accommodation Study.
	3. Strategic fit with emerging planning policy in the Blackpool Core Strategy, and neighbourhood plans.
Neighbourhood Evidence	4. Patterns of accreditation, and quality of premises in holiday accommodation use.
	5. Monitoring and Intervention in the Private Rented Sector (MIPS) and other survey data – in particular on business health, property use and condition.
Local Character	6. Current location, scale and appearance of properties which distinguish the character of individual Promenade and holiday accommodation areas.
	7. The incidence and completeness of holiday accommodation use of individual Promenade and holiday accommodation areas.
The Future	8. The perceived viability of individual streets and holiday accommodation areas.
	9. The anticipated market attractiveness to visitors and potential investors.
	10. The likelihood of securing an alternative future (primarily residential) for individual Promenade and holiday accommodation streets and areas.

7.15 Data has been collected recently and analysed in order to establish the current situation within the HAAs. Land use is mapped within each of the HAAs, off the Promenade, on a street by street basis, hence the predominance or otherwise of holiday accommodation can be measured and assessed. This also records details such as hotels/guest houses that are no longer trading, are empty or even derelict. In addition data is available on accreditation and properties that are currently on the market, both recent additions to the market and those that have been on the market for several years. Pressure for change can be assessed using known planning enquiries, particularly for change of use away from holiday accommodation, and streets and areas that are experiencing enforcement activity, such as the unlawful use of hotels/guest houses as HMO's.

7.16 Drawing on the original general criteria as well as taking into account the outcomes of the evidence that has been gathered, the following criteria as set out in Table 7.1 should be used to re-evaluate the HAA boundaries off the Promenade.

**Table 7.1: Revised Assessment Criteria**

	<b>Criteria</b>	<b>Description</b>
<b>A</b>	Sustainable location	Well located to key attractions, the promenade and public transport
<b>B</b>	Predominance of active holiday accommodation uses	Concentrations of holiday accommodation in the street
<b>C</b>	Proportion of holiday accommodation which is no longer trading	Number of vacant hotels within the street
<b>D</b>	Vitality and condition within the street / area	Overall character of the street
<b>E</b>	Incidence of accreditation	Levels of current visitor accommodation accreditation
<b>F</b>	Pressure for change – currently on the market	Number of properties currently on the market (October 2016)
<b>G</b>	Pressure for change – long term on the market	Number of properties that have been on the market for more than 5 years (since 2011)
<b>H</b>	Pressure for change – planning enquiries	Level of planning enquiries since 2011 for change of use to residential
<b>I</b>	Evidence of unlawful activity	Level of enforcement activity since 2011 for use of holiday accommodation for permanent residential purposes

7.17 The revised assessment on a street by street basis is shown in detail in Appendix 3. For each criterion a threshold is set, and a traffic light system is used to measure the current position of the street against each criterion.

#### d) the quantum of holiday accommodation on the Promenade

7.18 The Promenade, as the main shop window for the resort stretches some 8.3kms (5.2 miles) and includes large and small hotels, key attractions, holiday flats and residential accommodation and a range of other commercial premises. It is therefore mixed use in character. The red and orange areas identified in the HASPD cover approximately 50% of the total promenade frontage and represent some 125 hotels.

7.19 Guidance for the orange areas is set out on page 9 of the (2011) SPD and requires the retention of the quantum of existing holiday accommodation floorspace in any redevelopment, whilst at the same time encouraging a high quality mixed use holiday accommodation and residential offer. The restrictive nature of the guidance in terms of the quantum has resulted in little change in the orange areas through mixed use major redevelopment schemes reflecting market conditions and viability issues. A number of prominent hotel properties, particularly on the Pleasure Beach Promenade frontage currently lie empty and derelict and there is growing pressure for their redevelopment.

7.20 Consideration should therefore be given to amending the SPD wording for the Main Holiday Accommodation Promenade frontage (orange areas) as follows:

*Proposals will be supported which provide a high quality holiday accommodation offer alongside a supporting new residential offer. Any application will be required to justify the proposed mix of holiday accommodation and residential accommodation within the scheme.*

7.21 This approach seeks to permit redevelopment and improvement proposals which provide a new high quality mixed use seafront holiday accommodation and

residential offer. In these areas, there will be no specific safeguarding of the quantum of holiday accommodation bed spaces. However, mixed use proposals should include an element of holiday accommodation, justified by detailed viability evidence.

#### e) the appropriateness of the exceptional circumstances tests

- 7.22 The brief requires us to consider the appropriateness of the exception test allowing change of use in very exceptional circumstances as set out in the current HASPD:

*“change from holiday accommodation will only be permitted in very exceptional circumstances where properties fundamentally differ in character and it would be without any detriment to the character of the holiday accommodation area, with an assessment required indicating that the building is not viable for future holiday use.”*

- 7.23 The test has proven to be very effective in that only five planning applications for change of use away from holiday accommodation have been approved and implemented since 2011, and the 3 appeals received against refusals were all dismissed. However, there is evidence that this may be masking issues relating to low viability of businesses within the HAAs including increasing numbers of non-trading businesses, enforcement activity with regard to unlawful uses, poor external condition, and planning pre-application enquiries. The exception test has also led to some unforeseen impacts in terms of the incidence of long term vacant businesses which cannot change use and therefore lie empty. Evidence has revealed that there are a number of non-trading businesses within the HAAs, and that generally these businesses rarely re-establish due to both the current market and the costs of necessary improvements. It is therefore important to consider the significant viability issues that some business owners are facing and the personal and financial implications of not being able to seek alternative use for their property.
- 7.24 Given the current market conditions, it is both untenable and inequitable to continue with the existing exception test and consideration therefore should be given to amending the approach to a key exception test of viability. This would provide consistency and clarity in application of the policy. The impact of this change will need to be monitored and inform any future review.

#### Proposed revised test for exceptional circumstances

Applicants who can demonstrate through a transparent and robust viability methodology, as set out in Appendix 4, that the holiday use of the property is no longer viable, should be granted permission subject to a test that the proposed use will be compatible with other holiday accommodation uses in the street and would contribute to the regeneration of the wider area.

- 7.25 Key points which any viability assessment methodology should address are:
- The emphasis is on establishing potential trading performance rather than the existing or previous (if not trading) performance.
  - Emphasising that neglect or under investment will not, ‘on their own’, be sufficient reasons for allowing non-holiday accommodation uses.
  - Considering whether commercial acumen and how the business has been financed are considerations in terms of establishing whether the existing operation is viable.

- Be proportionate and consider the potential need for different detail of testing depending on the business size/number of bedrooms.

7.26 We would suggest that any revised viability assessment is referred to but not included in the revised SPD to ensure that it can be readily updated to reflect experience and changing circumstances.

#### f) the need for complementary controls and actions

7.27 As outlined in Section 5, there are a number of other actions which can complement the HASPD. We have subdivided these as follows:

- i) controlling the quality and viability of residential conversions;
- ii) controlling HMOs through an Article 4 Direction;
- iii) licensing and improving businesses;
- iv) poor environmental conditions;
- v) 'joined up' thinking and development of an action plan.

#### i) controlling the quality and viability of residential conversions

7.28 To ensure the integrity of the defined areas it is essential that any future approvals for change of use must be correctly implemented. This means that the quality of the conversion is enforced, and conditions are implemented. This may require a more proactive approach to compliance and enforcement action.

#### ii) controlling HMOs through an Article 4 Direction

7.29 We understand that the Council has already undertaken an initial assessment of the feasibility of implementing an Article 4 Direction thereby removing permitted development rights for change of use to HMOs within the Borough. We would recommend that this be given further urgent consideration and should include an assessment of the success and or lessons learned from the experience of Manchester City Council as set out in Section 6.

#### iii) Licensing and improving businesses

7.30 Land use planning policy is only one form of control. The Council has been successful in introducing licensing schemes in the wider Blackpool area (see plan 3) to try and control HMOs and the quality of accommodation. These are summarised on the Council's website, see [Licensing Schemes in Blackpool](#). The first of the 3 schemes, in [South Beach](#), which included selective and additional licensing has been successful but comes to an end in March next year. However the Council is currently considering options including continuing to run the scheme. The [Claremont](#) scheme covers a larger area than South Beach and also includes both selective and additional licensing, running to April 2019. The latest scheme which started in 2016 covers the [Central](#) area and currently only includes additional licensing with a view to add selective licensing and will run until July 2021.

7.31 This additional layer of control has been successful and although it covers a much wider area than the HAAs, both on and off the Promenade (as seen on Plan 3) it is able to tackle some of the prevailing issues in the HAAs such as illegal HMOs, and anti-social behaviour.

- 7.32 A concern expressed through the informal consultation process was the quality of some business operators in the HAAs, seizing on the opportunity for holiday trade. The potential exists within the Council for the adoption at a local level of regulations relating to minimum business operator and accommodation standards that are required to operate a business in the HAAs.

#### iv) poor environmental conditions

- 7.33 Whilst we are aware of the severe financial constraints that the Council and business and property owners are under, there are concerns regarding the quality of the public realm and built environment in some of the streets in the HAAs and wider neighbourhoods which is impacting on the overall quality of the street scene. This relates to for example the maintenance of individual properties, the lack of green infrastructure in the public realm, the physical condition of alleyways, service areas and signage
- 7.34 The Council does not at present have any notable capital works programmes to improve the areas and there are no grants available to owners or groups of owners. The lack of public and private funding has meant limited environmental improvement intervention has occurred. Although some individuals have managed to maintain and improve their own properties others are burdened by a general lack of income from their business premises due to low occupancy rates, low tariffs and competition. This lack of income has severely hampered the ability of owners to invest in the fabric of the buildings, leading to further deterioration of the streetscene.
- 7.35 We suggest that consideration needs to be given to prioritising the identification of potential additional funding for the HAAs to initiate physical public realm and façade improvements and support the existing businesses. Addressing the environmental conditions will ensure the long term attractiveness of Blackpool's resort offer.

#### v) 'joined up' thinking and development of an action plan

- 7.36 Whilst the Council has a multi-faceted approach to addressing the challenging issues of the inner areas, we advise that the Council should prepare a multi element action plan with the involvement of relevant partners setting out all activities relevant to the future operation of holiday accommodation areas and the wider neighbourhoods promoting a comprehensive joined up approach across the Council and other involved agencies. This would help to ensure that agency programmes and actions are not at cross purposes, for instance the recent location of a probation office immediately adjoining a central HAA.

### Conclusions

- 7.37 The HASPD was adopted in 2011 and has now been in operation for 6 years. This review takes into account what has happened in the defined areas during this period and the prevailing issues. Based on the evidence we have assembled and the initial views expressed through informal consultation we can summarise the key conclusions as follows:
- Both the number of holiday accommodation premises and the number of bed spaces have decreased further between 2008 and 2016. The total number of

holiday accommodation bed spaces has reduced by 11,315 which is approximately 75% of the required reduction under scenario 1 of the Humbert study (circa 15,024). In terms of Scenario 1, there is still a need to reduce the number of bed spaces by around 3700. It is estimated that there are 703 holiday accommodation premises outside of the current HAAs that can contribute to the reduction in holiday bed spaces.

- The policy approach, “to manage the reduction of holiday bed spaces to achieve an economically viable level of holiday accommodation” is being effective. In terms of planning applications approved, the level of change within the HAAs since the SPD adoption in 2011 has been relatively small. In contrast, the amount of change outside the HAAs has been much greater.
- The holiday accommodation market is still weak and property values are depressed but it is important to note that some businesses are still doing well. Occupancy levels are in many cases very low (30%).
- A number of streets within the HAAs located off the Promenade are showing signs of pressure for change, mainly due to the closure of hotel/guest house businesses.
- Opportunities for redevelopment on the Promenade have been limited and the requirement for the quantum of holiday accommodation to be retained has been too restrictive.
- The problems are complex and land use planning policy is only one element and other complementary actions such as licensing, need to be put in place to ensure standards and controls are maintained in the HAAs.
- Some streets in the HAAs and their wider neighbourhoods experience poor or deteriorating quality of the public realm and built environment.
- Consideration should be given to amending the current exception test to reflect the continuing market decline and the emerging signs of business (viability) stress in the existing HAAs and to address the impacts of long term vacant buildings on the areas and the resort.
- Any amendments to the exception tests will require monitoring of land use changes within the HAAs. This will inform any subsequent review of the HAA boundaries.
- The viability test needs to be set out and it needs to be clear, reasonable and workable.

## 8.0 Options and recommendations

### Options

- 8.1 In considering the options available to the Council, we propose a minimum, selective and radical approach. In broad terms this involves:

Option 1: Minimal Change – no change to the current HAA boundaries, appropriate updating of text within the SPD and the provision of viability test guidance.

Option 2: Selective Change – reassessment of the streets within the HAAs against the updated criteria to determine where there has been any changes that would justify the removal of a street or whole area; revise the quantum requirements for redevelopment on the Promenade; revise the test for exceptional circumstances; provision of viability test guidance to support the exceptional circumstances test and appropriate updating of text within the SPD.

Option 3: Radical Change – removal of the HAAs off the Promenade (blue areas) and some elements of the Main Promenade frontage where justified to provide a significantly reduced area of control; revise the quantum requirements for redevelopment on the Promenade; revise the test for exceptional circumstances and appropriate updating of text within the SPD

- 8.2 Further detail on the options is provided below.

### Option 1: Minimal Change

- 8.3 The first option available is to continue with the HASPD, with only minor updated amendments to the written text. The exceptional circumstances in relation to character and viability would remain and the current boundaries (Red, Orange and Blue areas) would be retained as set out in the adopted HASPD in 2011.
- 8.4 In addition to the general amendments required to the document wording to bring it up to date, further guidance will be provided on the viability assessment. Reference to a viability template will be included which will set out the typical contents for such an assessment and the method by which it will be assessed providing clarity for applicants.
- 8.5 The policy as set out in 2011 has been effective in meeting its original aim to prevent change of use from holiday accommodation to other uses within the HAAs with only a small amount of change being permitted.

### Potential benefits

- The amended text would better explain the purpose of the HASPD and remove any current misunderstandings.
- Adverse business reaction would be minimised.
- Retaining existing areas will maximise the Council's control of uses within them.
- Will provide clearer direction on the requirements of the viability assessment.
- Continues to protect the most sustainable locations for holiday accommodation.



### Potential risks

- Does not address the issues of vacant and abandoned holiday accommodation in the HAAs because the exception test remains unchanged.
- Could lead to an increase in the number of vacant and abandoned properties as the strict character element of the exceptional circumstances criteria may still prevent unviable businesses from changing use.
- May lead to adverse business reaction from businesses wanting their street to be removed wholesale from an HAA.
- May lead to more vacancies, with consequent impact on quality and character within all areas both on and off the Promenade.
- May lead to an increase in unlawful uses.

### Option 2: Selective Change

8.6 This second option is to make the following changes to the SPD:

- undertake minor amendments to the text, as set out in Option 1;
- remove the requirement for redevelopment schemes on the Promenade (orange areas) to retain the quantum of holiday accommodation to allow flexibility (as set out in Chapter 7 section d);
- where justified amend the boundaries to the Promenade frontage where necessary to consolidate the existing holiday accommodation uses;
- amend the exceptional circumstances criteria (as set out in Chapter 7 section e) to give a greater priority to allowing proven non-viable businesses to change use subject to a robust and transparent viability assessment;
- introduce further guidance on the viability assessment;
- amend the off the Promenade HAA boundaries based on the updated criteria assessment - removing those streets where change is considered to justify removal.

8.7 Based on the review of the **Main Holiday Accommodation Promenade Frontage (orange areas)** as contained in Appendix 3, the analysis shows a predominance of green rating but there are some signals of pressure within certain promenade frontages. On this basis consideration needs to be given as to whether the following frontages should be removed:

8.8 **The Norbreck/Bispham frontage** is showing signs of pressure with some establishments not trading and some currently on the market. A number of established residential and commercial uses intersperse with holiday accommodation, although some of this is historic. The predominance of active and trading holiday accommodation establishments is receding.

8.9 **The Promenade frontage adjacent to South Beach** is predominantly hotels and holiday accommodation with some commercial use towards the south of the frontage. It is proposed that the existing properties at 391-463 Promenade could be removed from the current orange area as they are mainly commercial.

8.10 **South of the Pleasure Beach** includes a crescent of properties between Burlington Road West and the Solaris to the south (known as Bourne Crescent - 569-613 New South Promenade) and is predominantly hotel use. However since 2011, 4 large hotels in the crescent (the Kimberley, Palm Beach, Warwick and Henderson) have closed down. The Palm Beach and Warwick hotels have recently been demolished.

In addition, over the past few years there have been several pre-application enquiries for a change of use to residential and 2 planning applications for residential development have been refused since 2011, principally on intensity, scale, design, amenity and car parking grounds. It should be noted that here has been a recent planning permission for a new hotel (Hampton by Hilton) on the Palm Beach site.

## ii) Off Promenade within the HAAs

- 8.11 Appendix 3 provides the detailed analysis, assessing each street against the revised SPD criteria. Based on this assessment, it is suggested that the following 5 streets could be considered for removal; Havelock Street, Palatine Road, York Street, Withnell Road and Balmoral Road. These streets are showing increased signs of pressure across the various criteria, on the whole scoring red for key criteria B or C which relate to the number of active holiday accommodation uses or non-trading hotels respectively. Other factors are also evident with various combinations depending on the street with respect to low accreditation, high levels of property on the market and an increase in planning enquiries and enforcement activity.
- 8.12 Under this option there would also need to be regular monitoring of the 'health' of each area, with appropriate targeted review to take account of further changes. A number of other streets are beginning to show signs of pressure as illustrated in the assessment in Appendix 3.

### Potential benefits

- Still maintains some control of use in reduced areas
- The revised exceptional circumstances criteria would give greater emphasis to allowing proven non-viable businesses to change use which could assist in reducing the number of vacant/abandoned premises in the HAAs
- The text could be rewritten to better explain the purpose of the HASPD and remove current misunderstandings.
- The proposed revision to boundaries could minimise the risk of successful applications or appeals for change of use.
- For those streets removed provides more flexibility for holiday accommodation businesses to change use.

### Potential risks

- Adverse business reaction from streets to be removed as some hoteliers value being included in an HAA.
  - Uncertainty of the impact of the new exceptional circumstances criteria on the number of businesses lost in the HAAs due to non-viability
  - Retraction, in spatial terms, of the most sustainable locations for holiday accommodation
- Uncertainty of the impact of significant regeneration projects in Blackpool over the short to medium term which may affect the need for holiday accommodation

### Option 3: Radical Change

- 8.13 This option would go further than Option 2 above and would involve the removal of all of the 6 HAAs (blue areas), with a concentration only on the promenade properties within the red and orange areas. The promenade is the main shop window for Blackpool and contains many of the key hotels. The revisions to the promenade area as put forward in Option 2 would be included.
- 8.14 This option would therefore allow changes of use away from holiday accommodation in the HAAs off the promenade. Business owners who have been constrained from changing, have had to close down, or are operating unlawfully would be able to take advantage of the lifting of restrictions. Within the HAAs change is likely to take place in the short term.

#### Potential benefits

- Would remove the confusion between those holiday accommodation businesses that are inside and outside the HAA boundaries.
- Would allow the market to take its course across the whole sector.
- Would allow any holiday accommodation business in the resort to change use to residential giving flexibility in business and personal life choices.

#### Potential risks

- Likely to give rise to significant adverse business reaction as some hoteliers value being included in an HAA.
  - Uncertainty regarding the precise impacts on Blackpool's housing market.
  - Could lead to a rapid change in the sector with loss of holiday bed spaces beyond what is required, undermining the resorts visitor economy and wider neighbourhoods
  - Would involve the loss, in spatial terms, of the most sustainable locations for hotel development
  - Could lead to significant pressure on the resources of the development management and enforcement teams and the work of the anti-social behaviour officers.
- 8.15 Based on this review and the assessment carried out as shown in Appendix 3, at this stage there is insufficient evidence to justify removal of all the blue areas.
- 8.16 Although there is some anecdotal evidence regarding the general poor quality and health of some holiday businesses within the HAAs, a comprehensive survey of all businesses would be required to provide a more accurate picture. This would give a better indication of the number of businesses that are 'under stress' and give the Council a fuller understanding of how many properties are not trading, only trading during certain parts of the year, and ultimately operating at unviable levels.

## Recommendations

- 8.17 From the work undertaken for this commission it is clear that since its adoption in 2011, the existing HASPD has been successful in restricting the amount of change within the HAAs, and the wording of the exceptional circumstances test has been sufficiently strict to ensure that very few changes have taken place through the planning application process. However the strict wording of the exceptional circumstances test appears to have impacted on some HAAs leading to holiday premises being abandoned/left vacant or used for unlawful purposes.
- 8.18 The evidence shows that there has been a further reduction of holiday bed spaces within and outside the HAAs over a number of years, moving towards the targets as set out in the various scenarios in the Humbert Study.
- 8.19 There is also anecdotal evidence which suggests that the 'health' of existing businesses within the HAAs may be such that their viability in the short to medium term is vulnerable. Recognising that 'business stress' is occurring within the existing defined areas it is important that consideration be given to allow further change and bring about the required market adjustment in a controlled manner.
- 8.20 **Option 1**, which is the minimum change approach, would maintain the most control over change of property use through the planning process and retain to the full extent, the locations which are identified as the most sustainable in spatial terms for holiday accommodation, in particular for the smaller guest houses, B&B's and holiday flats. However, it will not, on its own, address the increasing issues of business viability. As Option 1 does not propose any change to the exceptional; circumstances test it is therefore likely to lead to an increasing level of vacant premises, unauthorised uses and associated social issues with consequent impact on the wider resort neighbourhoods.
- 8.21 The level of change suggested under **Option 3** would effectively remove control which is currently afforded by the HAAs off the Promenade. Removing all the HAAs off the Promenade may promote significant changes of use to residential which could destabilise the areas which provide much of the traditional Blackpool holiday accommodation offer. There is concern over unforeseen issues with consequent impacts on the wider resort and potentially a significant reduced holiday bed-space offer.
- 8.22 **Option 3** is also likely to lead to a significant reaction from the community. Evidence has shown that in some cases the designation of an HAA, in particular off the Promenade, appears to have galvanised communities and as demonstrated in the assessment in Appendix 3 some streets are performing well. It is therefore important that this option should only be considered based on strong up to date evidence. A comprehensive survey of all holiday accommodation businesses would be required to provide an accurate picture and help to identify the numbers of businesses that are 'under stress' and may wish to cease trading in the near future.
- 8.23 Taking into account the 3 options we have presented, it is recommended that consideration be given to presenting **Option 2** for consultation.
- 8.24 **Option 2** retains the HASPD but with amendments to existing boundaries of the areas to reflect those streets and areas which are showing a certain level of change since 2011 as supported by our analysis of the assessments (Appendix 3) and set out in Section 8 (paras 8.6 to 8.12)

- 8.25 Importantly, **Option 2** addresses the growing issue of business viability by revising the exceptional circumstances criteria. This will provide owners who can demonstrate poor business viability with more flexibility. This option will allow more change to happen but in a controlled manner.
- 8.26 It is important to note that whichever option the Council decides to adopt there are risks. There is no option that will give an easy solution to what is a major structural economic, social and physical problem.
- 8.27 In developing the options and considering the different elements of each option the Council should be made aware that each option is not mutually exclusive and the Council may wish to adopt one option with elements from another.

### Other recommendations

- 8.28 In addition we have set out below complementary actions which we suggest would need to be considered regardless of which option is chosen.
- 8.29 Based on our discussions with various stakeholders it is clear that planning policy alone cannot be expected to deliver the aims of reducing holiday accommodation, improving quality and creating balanced inner resort neighbourhoods. As discussed in Section 7f of this report the long term sustainability of the HAAs will not be secured by the HASPD alone. We would recommend therefore that the Council seek to urgently establish a joint working approach, involving appropriate Council teams, and external partners to develop an 'Action Plan' to secure the future of the HAAs. This action plan would include:
- Commissioning further evidence, including:
    - business and property surveys to establish business health and property conditions; and
    - environmental audit of the inner resort area to develop a baseline understanding of the nature of environmental conditions as a basis for developing intervention actions.
  - To develop intervention programmes/actions, including:
    - public realm improvements to the HAAs; and
    - business licensing scheme.
  - A comprehensive approach to planning and housing enforcement.
  - Continued monitoring of the New Homes from Old Places SPD to understand its effectiveness in delivering high quality residential conversions
  - Develop funding strategies, including lobbying Government and appropriate agencies.
  - Develop a joined up approach across the Council and external agencies to coordinate investment and other actions to maximise benefits and avoid mistakes, e.g. locating sensitive uses within or adjoining the HAAs.
  - Consider how other planning actions may assist including:
    - Article 4 direction dealing with change of use to HMO;
    - Local Development Orders (LDO's), e.g. to allow certain development within the HAAs.

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# **Revised Holiday Accommodation Supplementary Planning Document**

**Consultation Draft**

May 2017

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**[Insert How to comment page]**

The Council is consulting on this revised Holiday Accommodation Supplementary Planning Document (SPD) which will replace the current Holiday Accommodation SPD, originally adopted in March 2011.

We have undertaken a review of the effectiveness of the SPD and the appropriateness of the Holiday Accommodation Area boundaries and propose to make a number of changes to the SPD.

### **What are the key changes?**

These include:

- Proposed amendments to Promenade guidance (removing reference to fixed quantum)
- Proposed amendments to reflect the updated adopted Local Plan policy framework
- Proposed amendments to the exceptional circumstances test allowing change of use within Holiday Accommodation Areas in certain circumstances including new guidance on the requirements of the viability assessment
- Proposed amendments to text to improve the clarity of the SPD

**The HAAs only define where holiday accommodation premises cannot normally change to residential use. There are no “holiday zones”. Holiday accommodation premises that are not within one of these areas (HAAs) are still part of the resort, but owners have the option to change to residential use should they no longer want to carry on as holiday accommodation.**

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Appendix 1: Policy CS23: Managing Holiday Bed Spaces

Appendix 2: Key Promenade Hotel Frontages

Appendix 3: Main Holiday Accommodation Promenade Frontages

Appendix 4: Off Promenade Main Holiday Accommodation Areas

## 1 Introduction

**1.1** Holiday accommodation continues to be an important part of Blackpool’s tourism offer and is vital to the resort’s visitor economy. However, over the years tourism has changed. Whilst there has been an upturn in resort visitor numbers in recent years, Blackpool still has too many holiday accommodation bed spaces, with many businesses operating at marginal levels leading to a number going out of business or changing to inappropriate uses that are causing problems.

**1.2** In order to allow the reduction of holiday bed spaces to reach an economically viable level that supports Blackpool’s tourism economy, Blackpool’s Core Strategy policy enables more hotels and guest houses to change to residential use than before. This gives property owners more choice if they decide they no longer want to remain as holiday accommodation.

**1.3** In order to safeguard the strongest clusters of holiday accommodation in sustainable locations, we have defined **Holiday Accommodation Areas (HAAs)**, where restrictions on change of use apply. The policy is explained in more detail in this document, known as a ‘Supplementary Planning Document’ or ‘SPD’. It is important to note that Blackpool is a holiday resort and the council continues to champion the tourism economy, recognising the contribution good quality holiday accommodation makes wherever it is located.

**The HAAs only define where holiday accommodation premises cannot normally change to residential use in land use planning terms. There are no “holiday zones”. Holiday accommodation premises that are not within one of these areas (HAAs) are still part of the resort, but owners have the option to change to residential use should they no longer want to carry on as holiday accommodation.**

## 2 What is the current planning policy for managing holiday bed spaces?

**2.1** Policy CS23 of the Local Plan Part 1: Core Strategy (2016) ‘Managing Holiday Bed Spaces’ seeks to achieve an economically viable level of quality holiday accommodation (See Appendix 1).

**2.2** This policy allows more hotels and guest houses to change to residential use than before, encouraging a better balance of quality homes and holiday accommodation. In order to successfully manage this reduction and retain a sustainable level of holiday accommodation in the right locations with easy access to resort facilities and key transport routes, restrictions on change of use will continue to apply to properties located within the main holiday accommodation areas. Further details of these defined areas and related policy are explained in section 6.

### 3 Why did we produce a Holiday Accommodation SPD in 2011?

**3.1** The **2011 Holiday Accommodation SPD** was produced in response to the key findings of the **Fylde Coast Sub-Region Visitor Accommodation Study** published in 2009, which set the evidence context for planning policy in relation to the provision of visitor accommodation. The study considered the quality, quantity and location of visitor accommodation across the Fylde Coast. It recommended for Blackpool that existing bed spaces would need to be reduced by a minimum of around 15,000 to attain national average occupancy levels. This equated to a minimum reduction of over 400 holiday accommodation properties.

**3.2** The findings of the Study suggested more tightly focused resort neighbourhoods, concentrating protection of key conference and resort hotels on the promenade and upon the strongest remaining areas of holiday accommodation off the Promenade.

**3.3** In response to the Study and to manage the oversupply of bed spaces, a more flexible policy framework than previously set out in the 2006 Local Plan was developed in the Core Strategy which allows more holiday accommodation to change to residential use than previously. The policy seeks to retain a suitable level of guest accommodation by identifying Holiday Accommodation Areas and promenade hotel frontages in sustainable locations (with easy access to resort facilities and key transport routes and facilities) where change of use to other uses is restricted unless exceptional circumstance can be demonstrated. Outside these areas, holiday accommodation in principle can change to residential use.

## 4 What are the aims of the Holiday Accommodation SPD?

4.1 The SPD has been produced to provide the required detailed guidance in relation to Core Strategy Policy CS23, including the precise boundaries for the HAAs. The key aims of the SPD are:

- To define specific areas of holiday accommodation to which Policy CS23 of the Blackpool Local Plan Part 1: Core Strategy (2016) should apply.
- To support an improvement in quality and reduction in the amount of holiday accommodation, which consolidates provision in the most sustainable locations.
- To maintain the promenade as the 'shop window' to the resort, offering a range of high quality visitor accommodation.
- To provide a focussed supporting high quality holiday accommodation offer in the defined areas off the promenade.
- To encourage mixed neighbourhoods outside of the main HAAs, complemented by the 'New Homes from Old Places' SPD which provides guidance on residential conversions and subdivisions.

4.2 No separate Sustainability Appraisal (SA) or Habitat Regulations Assessment (HRA) is required for this document, as this is covered by the SA and HRA for the Core Strategy (which can be viewed at: [www.blackpool.gov.uk/corestrategy](http://www.blackpool.gov.uk/corestrategy)).

## 5 Why and how have we reviewed the SPD?

5.1 To ensure the guidance in the SPD is appropriate and effective in its role of contributing to meeting the objectives of the Core Strategy and delivering the intended outcomes, the Council made the decision to review the SPD five years post its adoption.

5.2 As part of the review, we have analysed a considerable amount of data including the change in the amount of holiday accommodation. This analysis informs us that whilst the number of holiday accommodation premises and bed spaces has continued to decrease since the Visitor Accommodation Study baseline (2009), there is still an oversupply, supporting the continuation of the guidance. The analysis shows that although the character of some of the holiday accommodation areas identified in the 2011 SPD has changed there is still a need to maintain the defined areas. Further information can be found in Appendix 3 of the **Blackpool Holiday Accommodation SPD Review 2016 - Stage 1 Report** (available at: [www.blackpool.gov.uk/holidayaccommodation](http://www.blackpool.gov.uk/holidayaccommodation)).

## Assessing the Holiday Accommodation Areas

**5.3** We have reviewed the criteria used in the 2011 SPD and considered it was necessary to simplify the approach. Each HAA street was assessed against the new criteria set out in Table 1 below. Although there have been some changes occurring within the HAAs since 2011 including business closures, unlawful activity and properties on the market, we are proposing to retain the Holiday Accommodation Area boundaries as per the 2011 SPD.

Further information on the criteria and street assessments can be found in Appendix 3 of the **Blackpool Holiday Accommodation SPD Review 2016 - Stage 1 Report** (available at: [www.blackpool.gov.uk/holidayaccommodation](http://www.blackpool.gov.uk/holidayaccommodation))

Table 1: Holiday Accommodation Areas Assessment Criteria

	Criteria	Description
A	Sustainable location	Well located to key attractions, the promenade and public transport
B	Predominance of active holiday accommodation uses	Concentrations of holiday accommodation in the street
C	Proportion of holiday accommodation which is no longer trading	Number of vacant hotels within the street
D	Vitality and condition within the street /area	Overall character of the street
E	Incidence of accreditation	Levels of visitor accommodation accreditation
F	Pressure for change – currently on the market	Number of properties currently on the market (October 2016)
G	Pressure for change – long term on the market	Number of properties that have been on the market for more than 5 years (since 2011)
H	Pressure for change – planning enquiries	Level of planning enquiries since 2011 for change of use to residential
I	Evidence of unlawful activity	Level of enforcement activity since 2011 for use of holiday accommodation for permanent residential purposes

## 6 What are we proposing?

6.1 The proposed revised wording of the SPD is set out in this section including the geographical areas where the policy will apply.

### Policy on the Promenade

6.2 The promenade is the resort's 'shop window' and makes an important contribution to Blackpool's holiday accommodation offer, with many of Blackpool's largest hotels being located here. Despite past decline in visitor numbers and some underinvestment in businesses and properties, the promenade remains the prime location for holiday accommodation. It also presents an opportunity for high quality residential accommodation on the seafront, which will help to support/complement investment in quality holiday accommodation, enhance the appearance of the promenade and improve Blackpool's housing offer.

6.3 The Core Strategy policy for the Promenade comprises two key elements:

- a) Key Hotel Frontages
- b) Main Holiday Accommodation Promenade Frontage

### Key Promenade Hotel Frontages - Core Strategy Policy CS23 (3)

#### What changes are we proposing?

- *In response to the outcome of the review process, there are no proposed changes to the boundaries of the Key Promenade Hotel Frontages*

6.4 The Key Promenade Hotel Frontages include a number of the resort's larger and best known hotels where existing holiday accommodation use will be safeguarded. Many of these hotels are listed buildings. In recognition of their architectural character and the important contribution which they make to the vitality of the promenade and the resort's heritage, the policy also seeks to ensure future development within these frontages is sensitively undertaken; in order to enhance the character and appearance of these key hotel buildings, whilst supporting their continuing use as holiday accommodation.

6.5 Within the areas listed below and defined in Appendix 2, holiday accommodation uses will be safeguarded and appropriate measures to enhance the character and appearance of existing hotel buildings and frontages will be supported, to help sustain the long term future of the resort.

6.6 This policy applies to:

- Queens Promenade frontage (from Cabin to the Gynn Square)
- Imperial Hotel, North Promenade



- The Crescent (242 – 280 North Promenade)
- Metropole, North Promenade
- Talbot Square Ibis Styles

## Main Holiday Accommodation Promenade Frontage - Core Strategy Policy CS23 (1a and 1b)

### What changes are we proposing?

- *In response to the outcome of the review process, there are no proposed changes to the boundaries of the Main Holiday Accommodation Promenade Frontages*
- *In recognition of the significant viability issues in redeveloping parts of the Promenade and in order to encourage high quality holiday accommodation with supporting residential we propose to delete reference to the retention of 'quantum' holiday accommodation floorspace. However, we are proposing to request viability information to justify the mix of holiday/residential uses.*

**6.7** The focus within the main holiday accommodation areas on the promenade is to support new or refurbished holiday accommodation and allow appropriate mixed-use developments that provide high quality holiday accommodation/residential uses. These developments would need to meet high standards of design and deliver clear regeneration benefits.

**6.8** Within the areas listed below and defined in Appendix 3 proposals will be supported which provide a high quality holiday accommodation offer alongside a supporting new residential offer. Any application will be required to justify the proposed mix of holiday accommodation and residential accommodation within the scheme.

**6.9** This policy applies to:

- Norbreck Castle and Bispham
- North of Town Centre Promenade.
- Central Promenade frontage.
- South Promenade frontage.
- Pleasure Beach Promenade frontage.

## Policy off the promenade

**6.10** The off promenade Main Holiday Accommodation Areas are made up of a number of streets that are considered to be the most concentrated areas of holiday accommodation which are well located to access the resort's attractions.

### Main Holiday Accommodation Areas - Core Strategy Policy CS23 (1a and 1b)

#### What changes are we proposing?

- *In response to the outcome of the review process, there are no proposed changes to the boundaries of the Main Holiday Accommodation Areas*
- *We recognise the significant viability issues faced by holiday accommodation owners and have amended the exceptional circumstances to remove the character test (Further information on the assessment can be found in section 7 of the **Blackpool Holiday Accommodation SPD Review 2016 - Stage 1 Report**)*
- *We will provide clearer guidance on what is required to demonstrate holiday accommodation use of a property is no longer viable.*

**6.11** Within the areas listed below and defined in Appendix 4, change of use from holiday accommodation, or the loss of sites used, or last used, as holiday accommodation, will be resisted.

**6.12** Change of use will only be permitted in exceptional circumstances where:

- 1) Suitable evidence is provided to demonstrate to the satisfaction of the council that the business is no longer viable and has no reasonable prospect of continuing as holiday accommodation; and
- 2) The proposed use is compatible with the holiday accommodation uses in the street and provides regeneration benefits to the immediate area

**6.13** The policy applies to:

**The Cliffs** - Empress Drive, King Edward Avenue and Gynn Avenue

**North Town Centre** - focused on parts of Lord Street and Banks Street

**South Town Centre** - focused on Adelaide Street, Albert Road, Charnley Road, Hornby Road, Reads Avenue, Palatine Road, Hull Road, Vance Road and Havelock Street

**Foxhall** - York Street and Bairstow Street

**South Beach** - focused on Barton Avenue, Woodfield Road, Wellington Road, St Chads Road and Alexandra Road

**Pleasure Beach North** - focused on Dean Street and Station Road, Withnell Road, Osborne Road, Balmoral Road, Burlington Road West and Clifton Drive

## Viability

**6.14** In recognition of the significant viability issues faced by some holiday accommodation owners in the Main Holiday Accommodation Areas, the guidance makes an allowance for **exceptional circumstances** when a change of use may be considered acceptable.

**6.15** It must be demonstrated through a transparent and robust viability methodology that future holiday accommodation use of the property is no longer viable. The proposed use will need to be compatible with other holiday accommodation uses in the street and make a contribution to the regeneration of the wider area.

**6.16** Further guidance on the viability assessment information required to be submitted alongside a planning application for change of use will be available on the Council's Holiday Accommodation SPD web page.

**6.17** The viability assessment should be proportionate depending on the business size/number of bedrooms. It will require consideration of:

- Potential trading performance (rather than the existing or previous (if not trading) performance)
- Commercial acumen and how the business has been financed, in terms of establishing whether the existing operation is viable.

**6.18** Neglect or under investment of a property will not, on its own, be a sufficient reason for allowing non-holiday accommodation uses.

## Appendix 1: Blackpool Local Plan Part 1: Core Strategy

### Policy CS23: Managing Holiday Bed Spaces

To achieve an economically viable level of quality holiday accommodation, the following approach will be adopted to manage a reduction in the oversupply of poor quality holiday bed-spaces:

1) Within the main holiday accommodation areas defined in the SPD:

a. Existing holiday accommodation use will be safeguarded and new or refurbished holiday accommodation will be supported

b. Change of use from holiday accommodation, or the loss of sites used, or last used, as holiday accommodation, will be resisted unless:

i. Exceptional circumstances are demonstrated in accordance with the SPD, or

ii. In relation to a promenade frontage, the proposal would provide high quality holiday accommodation alongside a supporting new residential offer. Such proposals would need to comply with the requirements of the SPD.

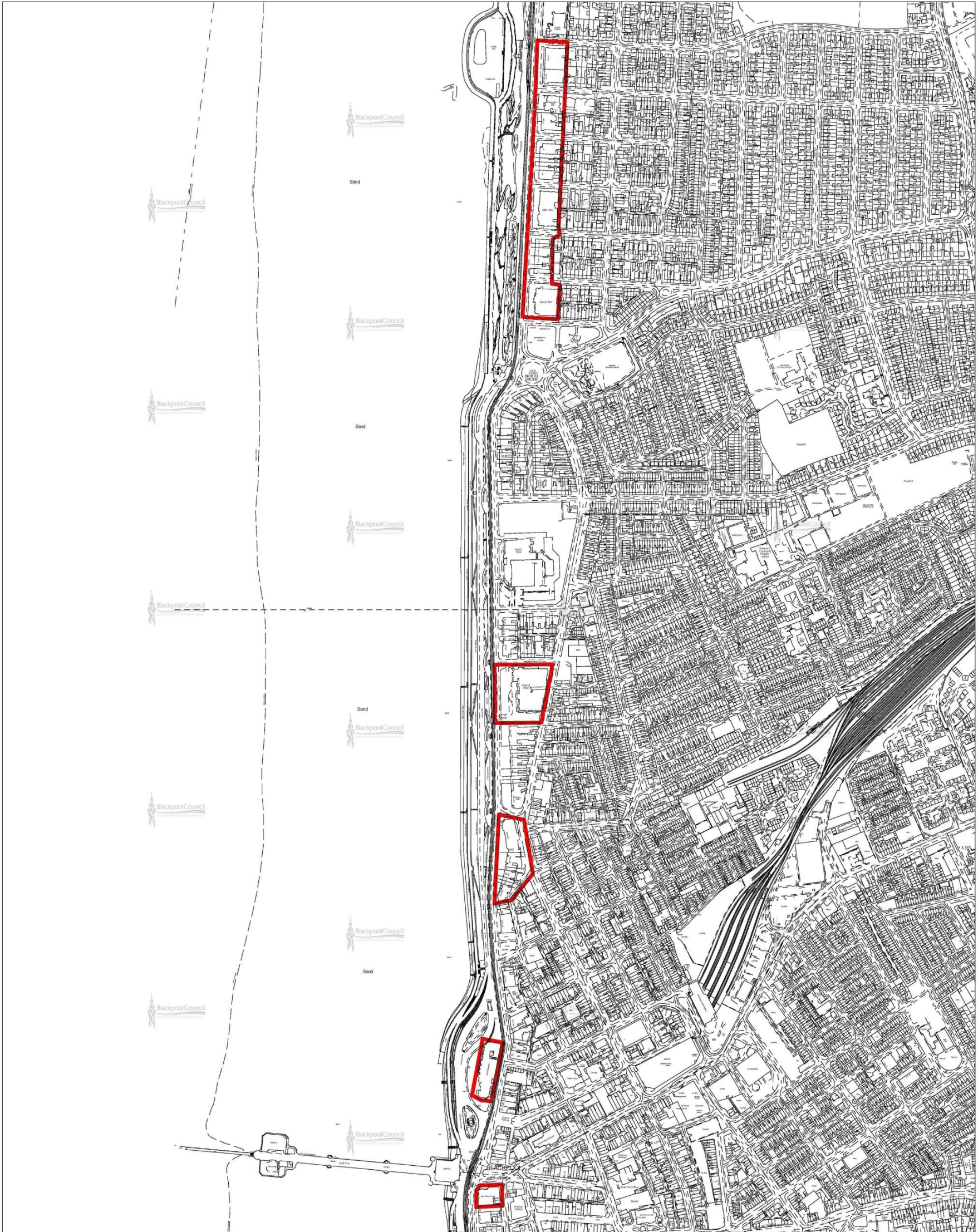
2) Outside the main holiday accommodation areas:

a. Where existing holiday accommodation is viable its retention will be supported, including measures to improve the quality of accommodation

b. Change of use from holiday accommodation to permanent residential use will be permitted where proposals provide high quality homes which comply with the council's standards for conversions or new build, and relate well in use, scale and appearance to neighbouring properties.

3) Within the key promenade hotel frontages defined in the SPD, holiday accommodation use will be safeguarded and appropriate measures to enhance the character and appearance of existing hotel buildings and frontages will be supported, to help sustain the long term future of the resort.

## Appendix 2: Key Hotel Promenade Frontages



### Queens Promenade to Talbot Square

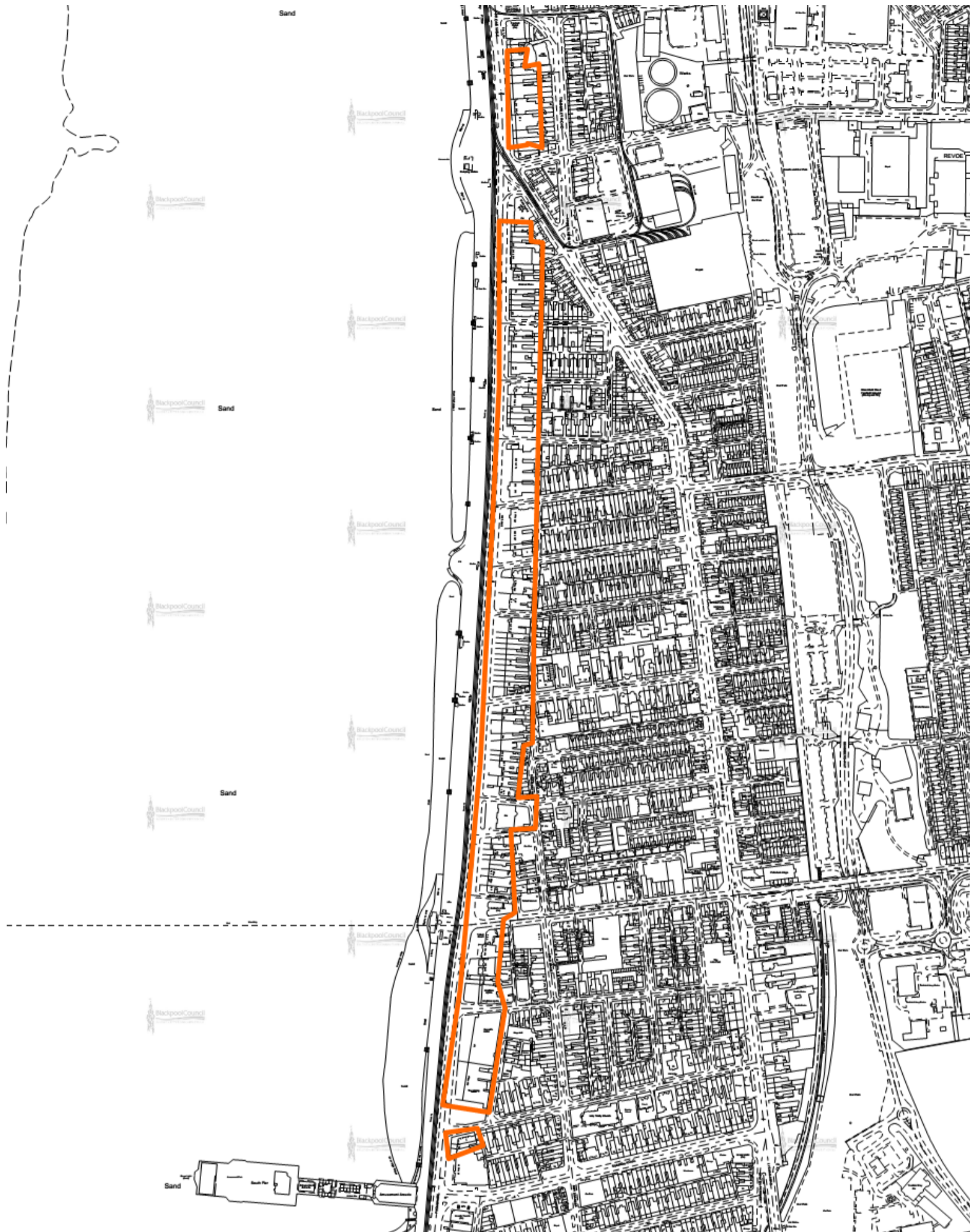
### Appendix 3: Main Holiday Accommodation Promenade Frontage



### Norbreck Castle and Bispham

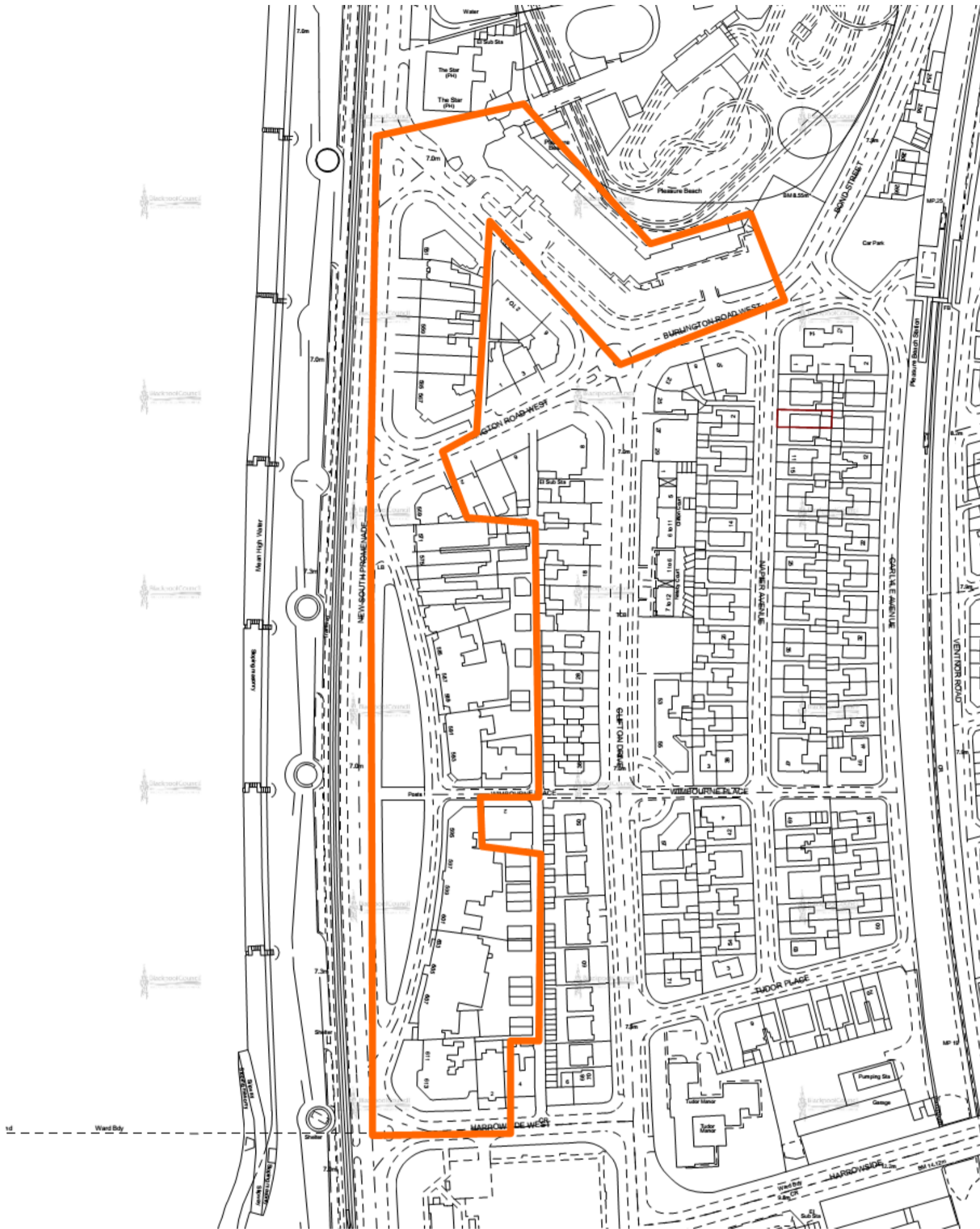


Gynn Square to Cocker Square



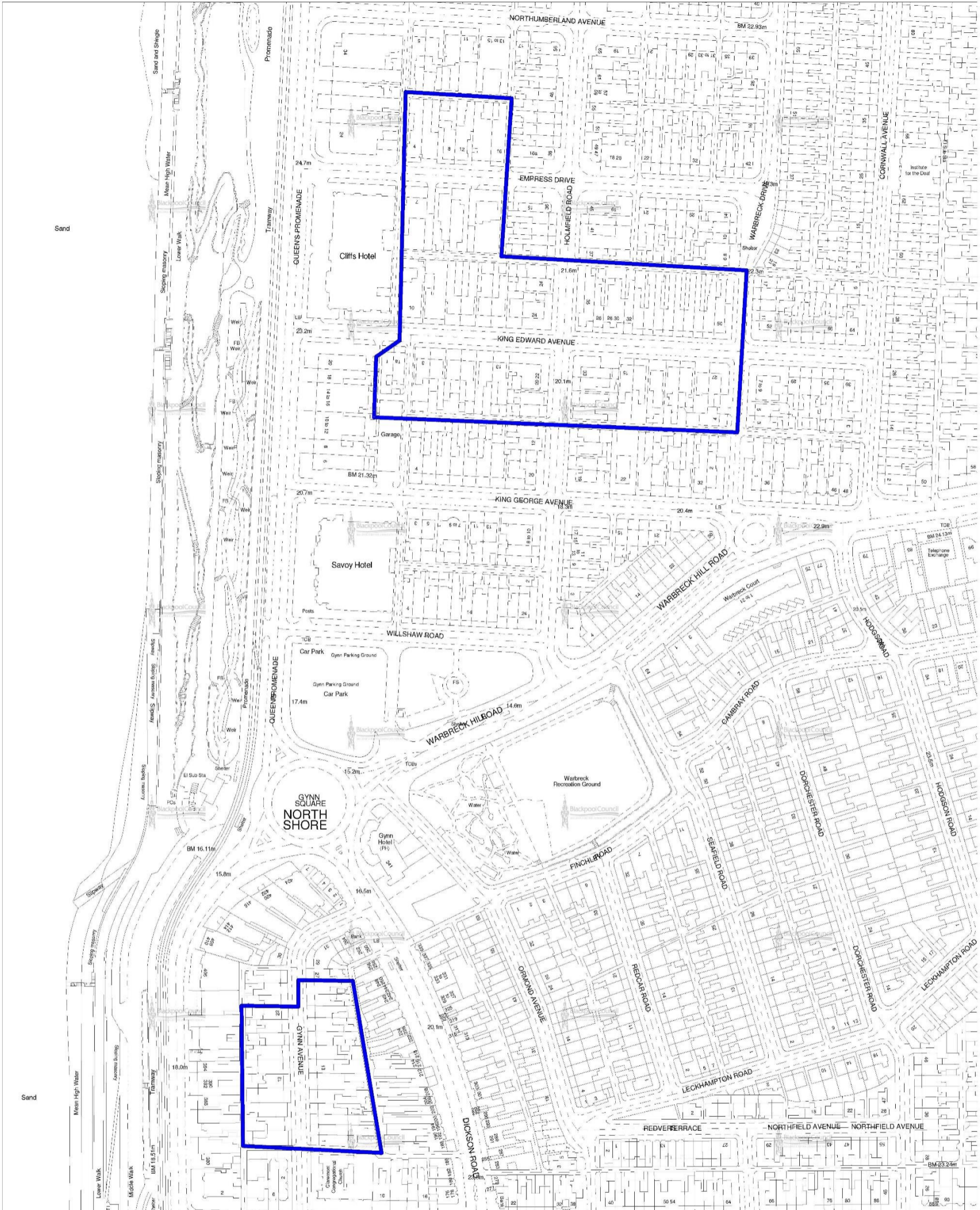
Foxhall/South Beach Promenade Frontage



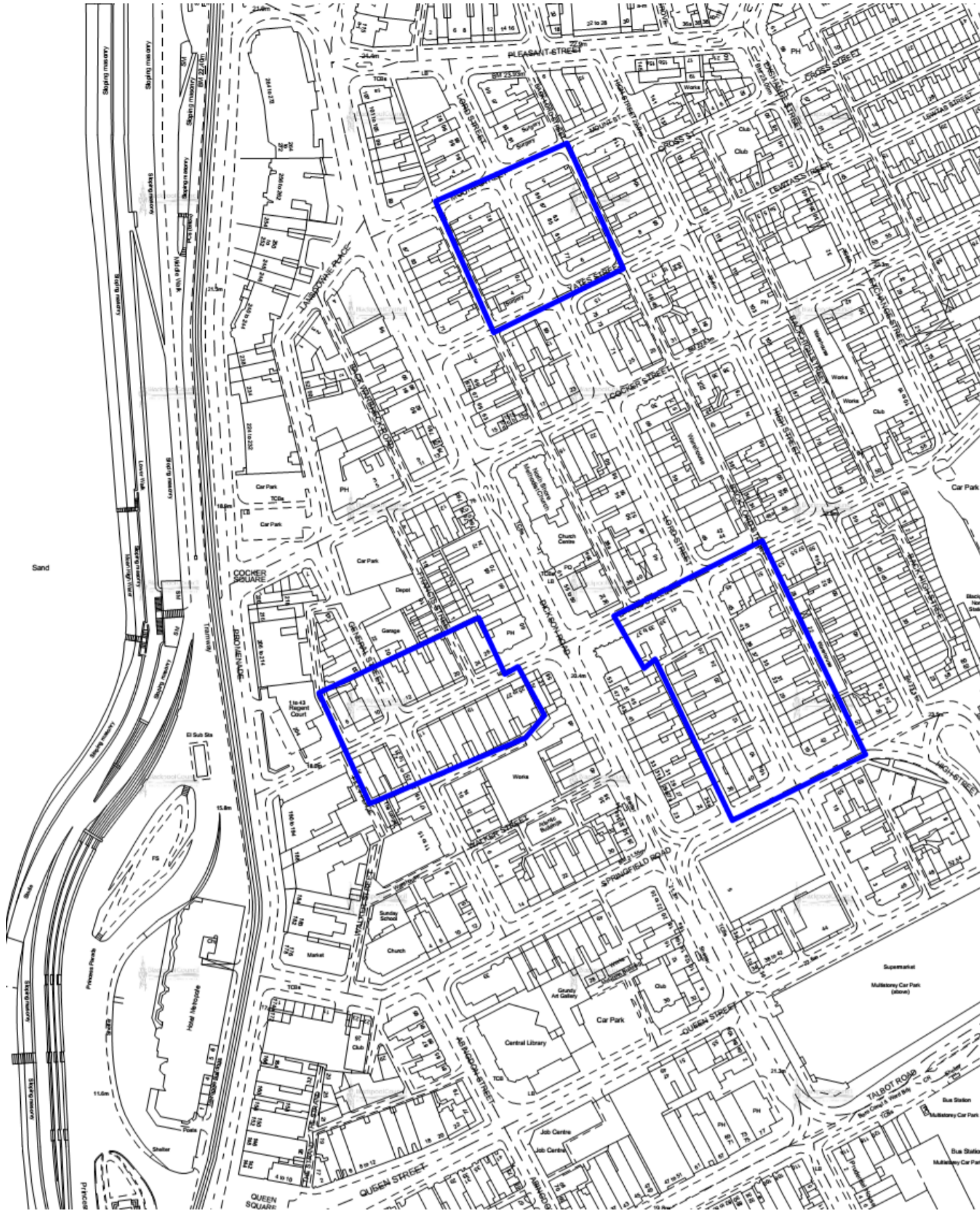


Pleasure Beach Promenade Frontage

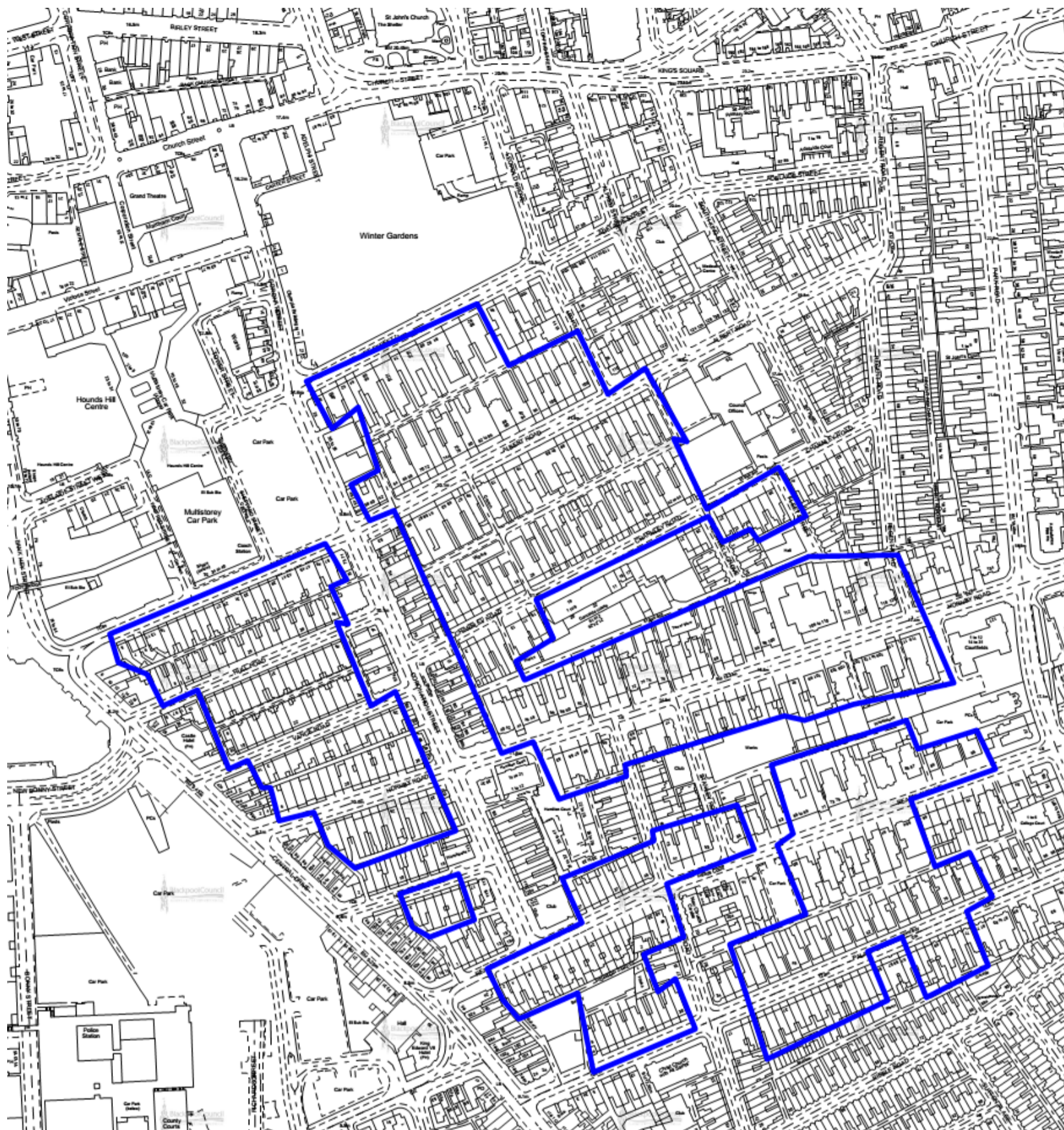
### Appendix 4: Off Promenade Main Holiday Accommodation Areas



The Cliffs



North Town Centre



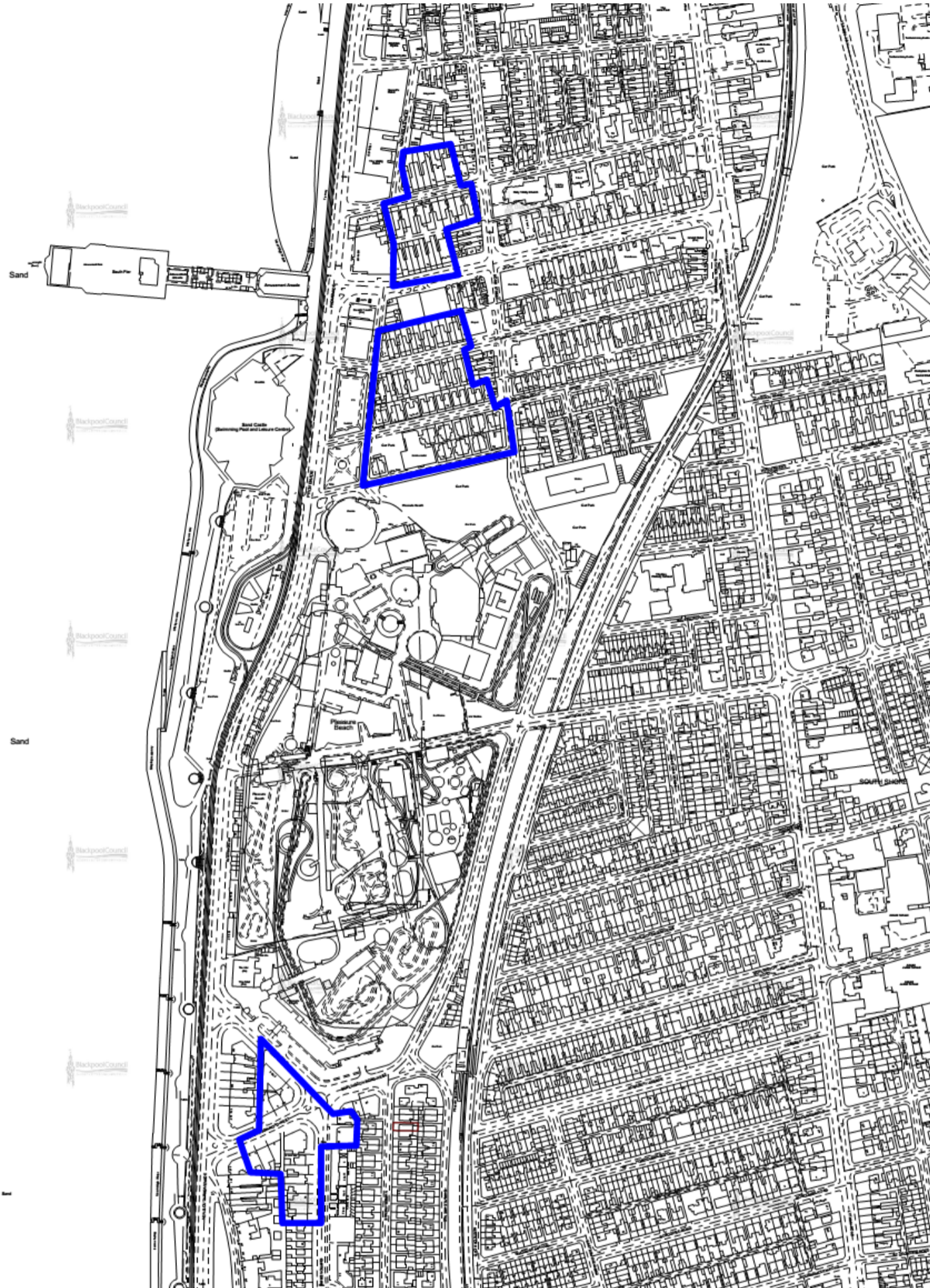
South Town Centre



Foxhall



South Beach



Pleasure Beach

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## APPENDIX 1 – Establishing a baseline

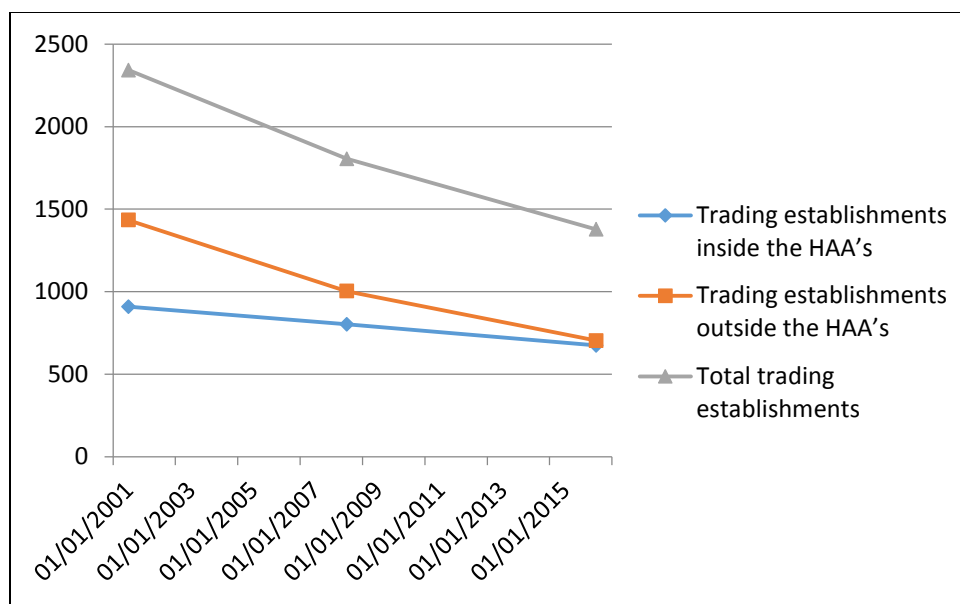
### 1.0 Establishing a 2008 baseline for comparison

- 1.1 Humberts figure of 1,805 premises in 2008 covered both serviced and non serviced accommodation throughout the town, and at that time the detailed current HAAs as designated in the 2011 SPD were not known or identified. In the HAAs we now know in 2016 that there are currently **782** serviced and non serviced premises including holiday flats but only **674** of these are currently trading. Assuming that all were trading in 2008 (782) and adding the known changes of use, conversions and lawful development certificates in the HAAs (approximately 20 which includes 2 ongoing enforcement cases where residential is now the permanent use) this gives a figure of 802 in the HAAs, leaving 1,003 outside (1,805 total in 2008).
- 1.2 Understandably the biggest change has been outside the HAAs and since April 2008 there have been approximately 222 changes (changes of use completions and approved LDC's) hence a revised total for holiday accommodation premises outside the HAAs in 2016 of 781 (1,003 minus 222). This figure also needs to be adjusted for those no longer trading, and based on the current known "not trading within the HAAs" of 10%, this would provide a trading figure outside the HAAs of 703. We could therefore assume that in 2016 there are **674** trading holiday accommodation premises (both hotels and self catering) in the HAAs and approximately **703** outside, a total of **1,377**.
- 1.3 Between 2008 and 2016 this represents an overall reduction of 24% (approx 16% in the HAAs and 30% outside the HAAs). Although we do not have data to support a subdivision of the 2001 CURS data (total of 2,342) we do know that this total declined by approximately 23% between 2001 and 2008. Applying a similar split based on the 2008-16 figures we can therefore develop a figure for inside and outside the HAAs for the 2001 data. This would provide comparable data for 2001, 2008 and 2016, and this is expressed in Table 4.7 below and Figure 4.1.

**Table 1: Estimated Quantum of holiday accommodation premises in Blackpool (hotels and self-catering)**

	2001 CURS study data	2008 baseline data	Current data (2016)
Trading establishments inside the HAAs	909	802	674
Trading establishments outside the HAAs	1,433	1,003	703
Total trading establishments	2,342	1,805	1,377

**Figure 1: Graph showing decline in the number of trading holiday accommodation premises**



## Bed spaces

- 1.4 In addition to the number of premises, previous studies have also referred to the total number of bed spaces. For this calculation it is necessary to apply certain assumptions. Humberts assumed in 2008 a total of 1,805 premises, and a total of 60,715 bed spaces. The 1,657 serviced accommodation (hotels and guest houses) had an estimate of 56,521 bed spaces (in 25,000 bedrooms) and the 148 non-serviced businesses accounted for a further 4,194 bed spaces.
- 1.5 The main hotels (approximately 108) were surveyed in detail in 2008 and had some 6,926 rooms and approximately 13,852 bed spaces. These were mainly located on the promenade. Based on the recent 2016 land use survey information there are currently 108 trading hotel premises in the red and orange areas (all located on the promenade) with a further 520 off the promenade (total of 628). It should be noted that in addition to the 628 hotels/guest houses, there are a further 46 trading holiday flat premises and these are analysed in more detail below.
- 1.6 If it is assumed that the 108 trading hotel premises in the red and orange areas still represent approximately 7,000 rooms that would equate to 14,000 bed spaces.
- 1.7 In the blue areas, off the promenade, there are currently in 2016 some 520 trading hotels/guest houses/B&B's. Humberts used an average of 12 rooms/property and approximately 2.3 bed spaces per room. This would provide a total number of bed spaces of 14,352 in the serviced accommodation sector. In addition there are 8 properties with holiday flats on the promenade and a further 38 off the promenade (total of 46). Again using Humberts assumptions of 8 units per property and 3.5 bed spaces per unit that equates to a further 1,288 bed spaces. This would give an estimated total of approximately 30,000 bed spaces in the HAAs in 2016.

- 1.8 To calculate the number of bed spaces outside the HAAs we are assuming in 2016 that there are some 703 trading establishment (both serviced and non-serviced). If we assume the majority are guest houses and B&B's and apply Humberts assumptions of 12 rooms/premises and 2.3 bed spaces per room this would give a total of approximately 19,400 bed spaces.
- 1.9 This would give a total in Blackpool of 49,400 bed spaces in 2016 in the known trading holiday accommodation. This represents a reduction of 11,315 (18.6%) since 2008 (60,715 minus 49,400). This represents approximately 75% of the required reduction under scenario 1 (circa 15,024).

### Caveats

- 1.10 It is important to note that it is known that many of the guest houses are operating as 'homes with income' and although many are shown as 'trading' in the above analysis it is likely that the figure is somewhat lower. The numbers of sustainably trading businesses is therefore likely to be much lower.
- 1.11 Although data has been gathered in detail within the HAAs there may be a need in the future to assess the areas outside the HAAs to check if the situation has changed significantly. Changes of use and lawful development certificates give some information but it is possible that many former guest houses have simply reverted to residential use without permissions in place.
- 1.12 There are also a number of larger hotels outside the HAAs such as the more recent Travelodges, the Blackpool Football Club hotel and the De Vere Village hotel.

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## APPENDIX 2: Preliminary Consultation Responses

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Ref	Topic	Key Issue Raised
<b>a) The current position in the HAA's</b>		
001	There has been a decline in the inner area: HMO's are of a poor quality; there are life expired guesthouses (as evidenced in the Humbert study which showed a minimum figure).	Decline
002	All of the figures for the developers are based on yield. Taking a typical example of £85/week for say 5 units that would be say 85x52x5 = £22.1K/year multiplied by 10 gives a figure of £221K as a value for the 5-unit property which is huge compared with the typical market value of say £50-100K.	Yield
003	Can't separate HAAs from wider housing and benefit issues which inner Blackpool faces	Other issues at work not just land use planning control
004	Different views expressed from removing the areas completely to making boundaries tighter based on changes.	
005	Agreed issue of what to do with failed businesses who can't change use within HAAs is difficult.	Failed businesses in the HAA's
006	In terms of accreditation there are only now 2 schemes running in the town: AA and Visit England. 2 star is the minimum rating.	Accreditation
007	The quality of the conversions to residential are often of a poor quality.	Quality of conversions
008	Difficult to make standards set out in New Homes from Old Places SPD work.	Standards/quality
009	Commercially it doesn't make sense to convert to single family home outside the HAAs. Materials costs alone have increased by approx. 25%.	
010	Electrical improvements can prove expensive and sometimes too expensive so is used under health and safety legislation as a way to shut places down.	
011	In the last 12 months evidence of long term hoteliers going out of business and old guest houses being run by inappropriate people.	Further closures
012	Issue of general poor standard of conversions when inspected as part of enforcement enquiries. Seems like most people have done works themselves owing to costs – again raises issue of viability of converting to high standard residential use.	Quality of conversions
013	The reference to 'holiday zones' is confusing.	
014	There still remains a lack of general understanding about the purpose of the HASPD and the definition of HAA's.	Purpose of the HASPD
015	On face of it policy seems to have worked, but all is not what it seems to be – on the front face i.e. sun room, table, chairs etc but behind is an HMO or marginal/unviable businesses.	
016	Blackpool experiences some complex issues. Private rented sector is very weak for two bedroomed accommodation – desire for one bedroom accommodation.	Housing demand
017	New homes from old places SPD – up to 160m2. Crystal road for example – not much demand for 2 bed. 50% is one bed.	Housing demand
018	2:1 ratio is an issue for the council and the new company (as set out in the New Homes from Old Places SPD)	
019	planning land use policy is only one component and other complementary actions are required.	Complementary actions

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Ref	Topic	Key Issue Raised
020	Need the mapping evidence and information from enforcement re cases and issues. Needs to be more joined up and monitored regularly.	Joined up working
021	Hotel closures - closures of hotels such as the Warwick and Palm Beach on the Promenade (Pleasure Beach HAA) - damage has been done.	Decline
022	Agents locally: Regular pool of agents in the town re plan apps but often not planners so don't understand the SPD and policy issues so don't look at the very exceptional circumstances or the viability issue.	Viability test
023	A typical 6-10 bed guest house is worth approximately £50-60K on the open market up to say £100K depending on the goodwill, trading position etc.	
024	Technology has changed things with online bookings (such as booking.com), smart phones, trip advisor, unofficial accreditation etc.	
025	Wet money is still important i.e. bar sales etc but when buying if wet sales are very high that raises concerns with banks and lenders.	
026	Budget hotel trade such as the Travelodge, Premier Inn, Ibis do want to be in Blackpool. Hamptons by Hilton (their budget chain) would like to come.	
027	Hotel chains don't want big, difficult and expensive conversions – prefer cleared sites.	
028	Market values are low but some do make it work	
029	There are success stories such as Blackpool Promotions. They have a number of hotels (such as the Royal Carlton, Boston, Doric, Queens Hotel Royal Seabank) and have recently taken over the Ruskin.	
030	Still demand for guesthouses but many do still need to go	Decline
031	HMO's and poor quality cheap guesthouses are ruining the market for everyone else. Boarded up former guesthouses and hotels do not give the right image for Blackpool.	HMO's
032	Council still working on the conference market.	
033	There are very few hotels that can accommodate conference trade – the Hilton is one.	
034	Marketing Blackpool's success re Prom, Tower and Winter Gardens works and attracts people only for them to find poor quality accommodation and poor environmental conditions- negates positive message	
035	Accreditation is an issue and something needs to be done to improve it across the area.	Accreditation
036	Blackpool needs to promote itself more widely and the excellent attractions it has.	
037	Some not bothered about the areas being defined on a plan i.e. the HAA's	HAA's
038	makes little or no difference in terms of controls and the market should decide.	
039	Residents/hotel guest house owners fought hard for its inclusion in the Cliffs area.	Need for HASPD
040	The inclusion in HAA used for protection	Need for HASPD
041	not being in the area would be very damaging	Need for HASPD
042	inclusion in HAA used to galvanise the community	Need for HASPD
043	Mixed views expressed on the need or otherwise for HAA's.	Need for HASPD
044	Common issue is the reference to "holiday Zones". There is a perception that being in is more important than	Need for HASPD

Ref	Topic	Key Issue Raised
	being out.	
045	Feels the HAA's are not working and have caused a lot of problems.	
046	Whilst the Holiday area boundaries are in itself good for tourism and lends itself to those seeking a location according to their needs I have to say that in my opinion has failed on a number of issues in our area.	
047	Namely the word "protected" has not been fulfilled as we now have a mixed accommodation zone where landlords are housing HMO tenants, B&B and Holiday flats allowing permanents to live free of any impact from our council.	
048	It feels worthless now, a non entity, as the quality of the area has gone down and it seems to us would take a change of attitude from the council to get on top of these important issues to make an impact in the right direction.	
049	Business owners within HAA's see it as a form of protection and would be an outcry if they were to go.	Need for HASPD
050	Good idea to keep them.	Need for HASPD
<b>b) Specific planning issues</b>		
051	Council have not approved any change of use within holiday areas, difficult to meet the exceptional character and viability test.	Little change post 2011
052	Change of use to residential inside the HAA's is difficult.	Little change post 2011
053	No current guidance given to applicants on viability. Only two viability assessments have been submitted.	Viability test
054	Change of use from holiday flats to flats (C3 to C4) doesn't need permission – but size up to 6.	
055	There are landlords/developers such as Clark and co who are looking only at holiday flats and pre 1994 permissions with no conditions just the old conditions re use at different times of the year – C3 use allows self-contained flats which are usually very small (just one room bedsit) to become one bed units i.e. a dwelling – effectively this creates a large HMO.	HMO's
056	Council's Planning Enforcement team are struggling to deal with all of the current cases – 600 cases on the go at present team of 6 (bigger than planning policy).	Enforcement
057	Viability tests are an issue. We now also have the national technical standards and this overrides the technical detail in parts in the New Homes SPD.	Viability test
058	Most/ many change of uses, approx. 100 per year since 2011 have been granted with conditions giving time to remove holiday related elements, including lounge and rear accommodation. These are beginning to be due for enforcement - could be a major issue - if don't take action may undermine overall policy approach.	Enforcement
059	Article 4 direction is possible for further controls but the problem is they are a sui generis HMO – the properties are too big – would need permission	Article 4
<b>c) Perception of the market</b>		
060	Guesthouses are closing down all of the time	Decline
061	some new owners have come in only to find they are next door to an HMO.	HMO's



Ref	Topic	Key Issue Raised
062	Accepts there is an oversupply in the town but there is still a big demand to visit. People want better quality.	Oversupply
063	some areas share custom if they cannot accommodate themselves and try to keep it in the area.	
064	Some aiming at the high end of accommodation. 5 star quality.	
065	Pricing is an issue as prices are generally depressed.	Low prices
066	some of the hoteliers are now quite old and do not know whether to continue	Decline
067	Hotel currently empty as cant be sold due to lack of banks lending for hotels to be purchased, but do have lots of requests for purchase for a family home which is not permitted.	Decline
068	We are aware and do appreciate that all B&B can be different and do therefore attract different clientele, namely groups, stags and hens, who seem to have a free hand when it comes to carrying drink in public area's as they make their way into town from where they are staying. These Hotel owners have no interest in the Holiday area and do not police their clientele in the way they should, causing anti social behaviour in some cases.	
069	Going concern transactions are in the minority, typically values are freehold non-trading plus the value of the market perception of the goodwill typically 1 – 1.5 times the net adjusted profit / Earnings Before Interest, Tax, Depreciation and Amortisation (EBITDA) plus an element for the in situ value of the trade fixtures and fittings.	
070	The market has not changed significantly for some time and we are still in decline and performance is poor	Decline
071	There is little lending into this sector, banks have a poor appetite for it and properties offered at auction are often failing to attract bids.	
072	In terms of the freehold non-trading values these vary typically from £6,000 - £10,000	
073	do not envisage any significant changes in the micro or macro market.	Decline
074	There is still an over-supply.	Oversupply
075	Non-trading hotels are difficult to sell if there is no alternative use.	
076	As long as the bed occupancy rate and therefore the net profits remain as low as they are, do not see any new Lenders coming into the sector.	
077	Market displays little or no difference if premises inside or outside the HAA's	
078	The quality of hotels is determined by the efficiency of the operator and often their longevity.	
079	A hotel outside the HAA's but with good car parking provisions will trade better than one within an HAA without.	
080	Hotels of a like type (typically 8-15 bedroom guest houses with no car parking provisions) do trade better in the HAA's than those on the fringes.	
081	Changes in marketing (laterooms.com etc) enable the fringe hotels to obtain some increased booking as often the holiday makers do not know exactly where they are but they rarely re-book.	Technology changes
082	In terms of sustained trade those closest to the main attractions fare best.	
083	The HAA's are important to the market.	Need for HASPD
084	Assuming that there is no viable alternative use the hotels sell better within the central cores as the hypothetical purchaser will reasonably assume that they can re-establish the trade more quickly than a fringe location.	Need for HASPD
085	Deals have broken down on premises outside the areas as there is a perceived view that you have to be in the	Need for HASPD

Ref	Topic	Key Issue Raised
	HAA's.	
086	Losing the HAA's would be a disaster.	Need for HASPD
087	The trading potential of a hotel is determined by three main factors: location, established trade and quality/extent of accommodation offered.	
088	The difficulty banks have is that they do not really know the ability of a future operator.	
089	Often hotels do not succeed a change in ownership as the goodwill was personal.	
090	Once a hotel/guest house fails it is difficult to re-establish the business so therefore banks will "hedge their bets" and look for central cores where there is a better performance history and more chance of the property re-selling.	Decline
091	Very little funding available in any event but to get it you have to be in one of the HAA's	Lack of funding
092	Little demand for residential uses in the HAA's	
093	Within North Shore and sections of South Beach the inter-relationship between houses and hotels works but in the central core areas people would not normally buy a house.	
094	The HAA's need to keep as many guest houses/same use as possible to work. Where housing has been introduced due to no parking, no gardens etc they tend to attract the wrong type of people, DSS claimants etc and that leads to anti social behaviour and the two uses side by side don't work.	
095	The main problem is occupancy rates and tariffs.	Low occupancy rates and tariffs
096	The annual occupancy rate for some guest houses is as low as 25%-30% per annum.	Occupancy rates
097	Competition for tariffs means that the turnovers are modest and the net adjusted profits are often very poor representing a yield (by reference to the turnover) of 3% or 4% where the market would normally expect 12%-18% for commercially traded hotels.	Low tariffs
098	Some guest houses continue to sell as they operate as a "home with income" and the purchasers are factoring in the cost of their own accommodation.	
099	Some streets in the HAA's show a high percentage, sometimes a majority, that have ceased to trade economically.	
100	The "hangers on" are effectively pulling down the rest of the trade.	
101	It is difficult to "cull" the fringe operators as often the freehold properties are owned and the proprietors can afford to just meet the overheads.	Poor environment
102	The stock is ageing. Most of it is late Victorian, some of it Mid-Victorian.	
103	The cost of repairs and renewals would if properly effected be proportionately high.	High costs
104	The hotels cannot generally generate any super profit and not enough profit to undertake running essential repairs (wind and water tight/ envelope) as well as constructive upgrading.	
105	Deterioration is evident if you walk down any service road at the back of Hotels. The front of hotels are generally well maintained, the back of them tells a different story.	Poor environment
106	The decline in some streets can be directly associated with the use of the properties as small flats.	Decline
107	The properties which obtain a Certificate of Lawful Use are often marketed to investors at very attractive yields.	

Ref	Topic	Key Issue Raised
	The investors have no interest on the effect of adjoining properties and usually do not actively manage.	
108	There are some long established hotels with good profit levels which reinvest, acquire adjoining units and promote. There are some very good operators including coach contract operators mainly from Scotland.	
109	There is some inward investment from hotel operators elsewhere.	
110	Further decline but the areas of guest houses we have need protection.	Decline
<b>d) Specific Issues and concerns going forward</b>		
<b>i) HMO's</b>		
111	Council has discussed with other seaside places re the number of HMO's issue and holiday flats – concluded that Blackpool has a raft of holiday flat accommodation unlike other areas.	HMO's
112	Hoteliers are generally fed up with HMO's – legal and illegal.	HMO's
113	Case of 25 Vance Road went on for months/years but has been more or less resolved but the damage has been done.	Anti social behaviour
114	5 Charnley is another example and 107 Albert Road.	Anti social behaviour
115	16 and 20 King Edward Avenue causing problems at present	Anti social behaviour
116	Different views expressed about residential uses in the HAA's.	
117	Some felt that such uses are incompatible and lead to problems. Erodes at the core activity of guesthouses and changes streets. Leads to anti social behaviour, such as on Vance Road (no.25) which took years to resolve.	
118	Concerns over conversions to residential in the main promenade frontages, and illegal HMO's.	Quality of conversions
119	Some felt that high quality single residential use can work if all provisions are made including bin storage.	
120	There is currently a problem with poorer quality residential conversions	
121	introduction of further residential into the centre of an HAA would be very damaging and would destabilise the community.	
122	Many of the commercial premises such as shops are now closed and in poor environmental condition.	Decline
123	There have been massage parlours, prostitutes, illegal HMO's and lots of anti social behaviour.	Anti social behaviour
124	Decision to put the probation service (Lancs and Cumbria) building/offices right in the centre of the South Town Centre HAA is a bizarre one.	
125	Mixed use can work well in certain areas depending on property type, i.e. relatively small sized Victorian properties that can be converted into a single house.	Mixed use
126	Hoteliers don't really mind quality single residential use that has met all planning requirements, including removal of holiday accommodation elements, but they fear HMOs.	
127	Hoteliers equate residential with HMOs.	HMO's
128	a single HMO can bring down a whole street.	HMO's

Ref	Topic	Key Issue Raised
<b>ii) Anti social behaviour</b>		
129	Massive problem of anti social behaviour.	
130	Whole street can suffer as a result.	
131	Example quoted of Joe Famosa, taking on old guest houses/hotels – offering poor quality non accredited accommodation at £6/night.	
132	Look ok on bookings.com but people shocked when they come so find something else – not as many complaints as you would think but what do you expect for £6/night.	
133	York Street a real problem (Foxhall HAA).	
<b>e) Comments on complementary actions</b>		
<b>i) Licensing generally</b>		
134	gives more powers over landlords.	
135	The fees generated help to fund the programme for the council – say around £500-900 per property and this helps to fund the scheme	
136	landlords often complain about the high cost of the fees but in the overall scheme of things it is not large.	
137	Allows the council to employ an anti-social behaviour officer and that person can take action. With more schemes the council has been able to employ more people and that can make a real difference on the ground.	
138	Housing also has a health and safety rating system under the 2004 act re category 1 hazards.	
139	It is noted that 60% of buildings have poor thermal quality i.e. they are very cold.	
140	This also looks at electrical and gas safety issues	
141	S215 relates to external appearance and condition	
<b>ii) Selective licensing</b>		
142	In Blackpool there are only 160 “high risk” HMO’s that fall into the mandatory category – however, just for comparison there are only 6 in Fylde. This only applies to “high risk properties” – they need to be 3 storey and involve at least 5 people.	
143	The council then has “non-mandatory licensing”. From 2010 the council does not need the S of S consent under the 2004 act to introduce such additional licensing.	
144	HMO ‘additional licensing’ – this covers a wider range than the mandatory licensing and is at a lower level. 2 or more units and 3 or more people	
145	In inner Blackpool there are 13,000 properties of which more than 50% are private rented –	
<b>iii) South Beach selective licensing</b>		
146	covers <b>all</b> private rented in an area	

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Ref	Topic	Key Issue Raised
147	for HMO's there is mandatory licensing where the landlord must get a licence.	
148	It is then a 5-year licence and rolling forward with renewals etc.	
149	began in 2012 and runs to March 2017 – 5 year programme but unlikely to extend.	
150	Involved some 900 properties that require a licence.	
151	An evaluation is carried out at the outset and due the number of properties it takes a while to get it up and running.	
152	It is about management of the private rented stock and covers issues such as anti-social behaviour and uses police data.	
153	They need to comply with around 20 licence conditions such as gas safety etc plus some relate to the external appearance of the property.	
<b>iv) Claremont (ward) area selective and additional licensing</b>		
154	scheme launched in April 2014 to April 2019	
155	much bigger than South Beach and involves some 1,600 properties	
<b>v) Central additional licensing</b>		
156	The newest area will come into force for 5 years from July 2016	
157	additional licensing only	
158	plan to add selective licensing	
<b>vi) Other initiatives/programmes</b>		
<b><i>Blackpool Housing Company</i></b>		
159	Company set up for housing development – has a project management role and is LEP funded. It is relatively new, LB only officially in post since 1 <sup>st</sup> May 2016.	
160	Relatively new	
161	23 units already letting – aim of 90 in the first year.	
162	Company using a variety of methods for delivery and trying to do exemplar schemes.	
<b><i>'transience programme'</i></b>		
163	linked to selective licensing which can give support to tenants.	
164	If someone has been thrown out by a landlord is, or has just been moving around etc.	
165	Intended to work with residents and try to find stability for them.	
166	Council also has had the public health transformation challenge award. This is central government funded (£1.5m over 3 years) April 2015 to April 2018 plus the 'troubled families programme'.	

Ref	Topic	Key Issue Raised
<b><i>'Clusters of empty homes programme'</i></b>		
167	CLG funded but has now finished. Used 2001 census data which showed 10% long term empty – in the inner wards this showed 8-9% but from the updated 2011 census proven right with 11-12%.	
168	LA's bid for the money - £200K max empty homes via HCA funding. 100 units in 2-year period March 2013 to March 2015 approx £1.6M.	
<b><i>"community protection warning notice"</i></b>		
169	Council can use "community protection warning notice" under the anti social behaviour act. Problem is that places close and just reopen under a new name.	
170	Would like to see a business case pushed forward for a local by-law such that controls could be put in place, i.e. min standards for people to run a guest house/hotel.	
<b>f) Site and area specific comments</b>		
<b><i>i) The Cliffs and Gynn Avenue</i></b>		
171	Older person's clientele, quieter end of Blackpool away from hustle and bustle of town centre and the pleasure beach areas.	
172	Current issue on King Edward Avenue re HMO's and anti social behaviour, but problem caused by holiday flats which can change to resi without permission.	Anti social behaviour
<b><i>ii) Lord Street Area</i></b>		
173	No real pressure, gay friendly end of town.	
<b><i>iii) South town centre</i></b>		
174	Palatine – both no's 53 and 56 appeals were dismissed and policy holding firm	
175	College on the other side of Park road (to the east) and this has had an effect of demand for student accommodation but this has now dampened down a little.	
176	Albert Road – interesting case where there is now a hotel on the ground floor and flats on floors above – makes for an interesting split of uses and issues of how you control through planning etc.	
177	Case of Palatine Road – wanted to be taken out. Had a petition and ignored by the council.	
178	Petition was put forward to the council regarding the whole of palatine road to be removed from the HAA signed by all of the hotels bar two who were unavailable at the time. Told by the council they had no time or bodies to look at it.	
179	Central areas around Albert Road and Charnley Road around Winter gardens need all the help they can get.	Decline

Ref	Topic	Key Issue Raised
<b>iv) Foxhall</b>		
180	Also a conservation area so further layer of control but the two HAA's are only relatively small and involve just 2 streets.	
181	There is a current issue re 34/35 York street.	
182	Bairstow Street – 41/45 now a homeless persons home.	
<b>v) South Beach</b>		
183	Issue on 9/11 Wellington Road	
184	15 Barton avenue – holiday flats to permanent	
185	Woodfield/St Chads – has external character	
<b>vi) Pleasure beach</b>		
186	Dean street – there is one conversion	
<b>vii) Promenade</b>		
187	The crescent frontage to the left (north) of Solaris is now in a sorry state.	Decline
188	The Warwick and the Kimberley hotels are now boarded up. The Henderson is not trading and there is an application for permanent flats.	Decline
189	Apart from central promenade, high quality mixed use should be allowed. Any change of use to be high quality.	
190	No single answer to the problems facing holiday accommodation businesses.	

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## Appendix 3 - Assessment

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## APPENDIX 3 – Assessment

### 1.0 Introduction

- 1.1 The adopted HASPD includes areas on the Promenade (red and orange areas) and a total of 30 streets off the Promenade in 6 distinct areas (blue areas), all as shown on Plans 2a-f in the Stage 1 report.
- 1.2 As outlined in section 7 of the Stage 1 report a number of changes have taken place in each of the areas where the HASPD applies. The purpose of this assessment is to consider the changes that have taken place and provide a snapshot of the current position in each of the areas and streets. These are summarised in the tables below and are based on the current database which is held by the Council.

### 2.0 The data and criteria

- 2.1 Data has been measured and updated as required during 2016. All data is contained in a database, held and updated by the Council. Land use information, planning enquiries and planning enforcement data is provided by the Council's planning department. Accreditation and 'on the market' data is held by other organisations (AA and Visit England for accreditation and local agents for properties on the market) and passed to the Council, and is regularly updated.
- 2.2 As outlined in Section 7 of the Stage 1 report the criteria used to assess each of the areas and streets is as shown in Table A3:1 below:

**Table A3:1**

	<b>Criteria</b>	<b>Description</b>
<b>A</b>	Sustainable location	Well located to key attractions, the promenade and public transport
<b>B</b>	Predominance of active holiday accommodation uses	Concentrations of holiday accommodation in the street
<b>C</b>	Proportion of holiday accommodation which is no longer trading	Number of vacant hotels/guest houses/holiday flats within the street
<b>D</b>	Street Character	Overall character of the street
<b>E</b>	Incidence of accreditation	Levels of current visitor accommodation accreditation
<b>F</b>	Pressure for change – currently on the market	Number of properties currently on the market (October 2016)
<b>G</b>	Pressure for change – long term on the market	Number of properties that have been on the market for more than 5 years (since 2011)
<b>H</b>	Pressure for change – planning enquiries	Level of planning enquiries since 2011 for change of use to residential
<b>I</b>	Evidence of unlawful activity	Level of enforcement activity since 2011 for use of holiday accommodation for permanent residential purposes, this includes hotels being used as houses or HMOs, hoteliers taking in permanent residents and holiday flats being used as permanent flats.

### 3.0 How the assessment has been undertaken

- 3.1 The HASPD includes approximately 1,000 properties, 67% of which are shown as currently “trading” holiday accommodation. Properties are located in two distinct areas: those on the Promenade; and those off the Promenade.
- 3.2 In the case of the Promenade, the current HASPD includes several sections. The “key hotel frontage” (Red area) is easily identified and stretches from Queens Promenade to Talbot Square and includes some of the larger hotels. Within the “main holiday accommodation” promenade frontage (the Orange areas) there are 4 distinct stretches: Norbreck and Bispham Promenade (O1); North Town Centre Promenade (O2); South Promenade (O3), and Pleasure Beach Promenade (O4).
- 3.3 Off the Promenade there are some 30 streets in 6 distinct areas, representing approximately 83% of the total “trading” holiday accommodation.
- 3.4 For the purposes of this assessment we have used the current SPD boundaries, as shown on Plans 2a-2f.
- 3.5 For each criterion a threshold has been developed as shown in Table A3:2 below, with the result falling into one of three categories: Red; Orange; and Green.

**Table A3:2**

CRITERIA & THRESHOLDS	GREEN	ORANGE	RED
(A) Sustainable location	Based on assessment of location		
(B) Predominance of active HA uses	more than 75%	between 50 and 75%	less than 50%
(C) Proportion of holiday accommodation not trading	less than 10%	between 10 and 25%	more than 25%
(D) Street Character	Street has a strong holiday character	Street has some elements of holiday character	Street has a mixed character
(E) Incidence of accreditation	more than 40%	between 15 and 40%	less than 15%
(F) Pressure for change - currently on the market	less than 15%	between 15 and 40%	more than 40%
(G) Pressure for change - long term on the market	less than 5%	between 5 and 20%	more than 20%
(H) Pressure for change - planning enquiries	less than 5%	between 5 and 10%	more than 10%
(I) Evidence of unlawful activity	less than 5%	between 5 and 15%	more than 15%

- 3.6 The full results of the assessment can be seen in Table A3:3. This provides a ‘traffic light’ system of assessment. This allows an overview of each criterion so as to see where there is increasing pressure for change; where the predominant activity is no longer that of holiday accommodation; and where accreditation levels are low.



**Table A3:3**

Ref	Street Name	(A) Sustainable location	(B) Predominance of active HA uses	(C) Proportion of holiday accommodation not trading	(D) Street Character	(E) Incidence of accreditation	(F) Pressure for change - currently on the market	(G) Pressure for change - long term on the mkt	(H) Pressure for change - planning enquiries	(I) Evidence of unlawful activity
CL01	Empress Drive	G	G	G	G	O	R	G	G	O
CL02	King Edward Avenue	G	O	G	G	G	O	O	G	G
CL03	Gynn Avenue	G	G	O	O	O	O	O	G	R
NTC01	Lord Street (between Yates Street and Mount Street)	G	O	G	G	O	R	O	O	O
NTC02	Lord Street (between Banks Street and Springfield Road)	G	O	O	O	R	O	G	G	R
NTC03	Banks Street (between Promenade and Dickson Road)	G	O	O	O	R	O	G	O	O
STC01	Albert Road (between Central Drive and Coronation Street)	G	O	O	O	O	R	R	G	O
STC02	Hull Road	G	G	G	G	O	G	G	O	O
STC03	Vance Road	G	O	O	G	O	O	O	O	O
STC04	Hornby Road (between Central Drive and Coronation Street)	G	G	O	G	R	O	O	G	G
STC05	Havelock Street	G	G	G	R	R	O	R	G	R
STC06	Adelaide Street	G	O	O	O	R	R	R	G	O
STC07	Albert Road (between Coronation Street and Leopold Grove)	G	G	G	G	O	G	G	G	O
STC08	Charnley Road	G	O	O	G	R	R	R	G	O
STC09	Hornby Road (between Coronation Street and Regent Road)	G	O	G	O	O	O	O	O	G
STC10	Reads Avenue	G	O	O	R	R	O	O	O	O
STC11	Palatine Road	G	O	R	R	R	O	O	O	O
FOX01	York Street (between Singleton Street and Coop Street)	G	O	R	O	R	G	O	R	R
FOX02	Bairstow Street (between Dale Street and Caroline Street)	G	O	O	O	R	G	G	G	G
SB01	Barton Avenue	G	O	G	O	O	O	G	O	O
SB02	Wellington Road	G	G	G	O	R	O	O	O	R
SB03	Woodfield Road	G	O	O	O	R	O	G	R	O
SB04	St Chads Road	G	O	O	G	R	O	O	G	O
SB05	Alexandra Road	G	O	O	R	O	O	G	G	O
PB01	Dean Street	G	O	O	O	R	G	G	G	R
PB02	Station Road	G	G	G	O	R	O	G	G	G
PB03	Withnell Road	G	R	O	O	R	G	G	G	O
PB04	Osborne Road	G	O	G	O	R	G	G	O	O
PB05	Balmoral Road	G	R	G	R	R	G	G	G	R
PB06	Clifton Drive	G	G	G	R	O	O	O	G	G
R1	Key Promenade Frontage	G	G	G	G	G	O	G	G	G
O1	Norbreck and Bispham Promenade	G	R	O	G	O	O	G	O	O
O2	North Town Centre Promenade	G	G	O	G	O	O	G	G	G
O3	South Promenade	G	O	O	G	O	O	O	O	O
O4	Pleasure Beach Promenade	G	G	O	G	O	G	G	O	G

## 4.0 Results and recommendations

- 4.1 Based on the results of the assessment shown in Table A3:3 above an individual summary is provided for each area/street together with an overview.
- 4.2 In general terms the assessment shows that there has been an overall weakening of the position since 2011 with greater pressure for change and this picture echoes the comments made in the preliminary consultation during 2016.
- 4.3 A key criterion is the predominance of holiday accommodation (criterion B). Each area was originally chosen to reflect concentrations of trading holiday accommodation. Where the percentage of active holiday accommodation has dropped below 50% the area/street is shown as 'red'.
- 4.4 'On the market', planning enquiries and evidence of unlawful activity illustrate the pressure for change. Accreditation levels are generally low throughout the resort. The street character assessment was undertaken by the Council's planning staff and is based on a range of factors such as the physical appearance of the street as a whole, attractiveness, activity levels, cleanliness etc.

### The Promenade frontage

- 4.5 A summary of the Promenade assessment is shown in Table A3:4 below. Only the Norbreck and Bispham frontage (O1) is no longer predominantly holiday accommodation, however this stretch of the Promenade includes several other uses including some historical residential uses. In the South Promenade frontage (O3) a number of high profile commercial uses are included in the current assessment area (between No's 391 and 463 Promenade) and an option would be to amend the boundary accordingly thereby strengthening the concentration of holiday accommodation in this section of the Promenade. Along the Pleasure Beach Promenade frontage (O4) there are a number of large former hotels in Bourne Crescent which are no longer trading.

### Areas off the Promenade

- 4.6 Each of the six areas off the Promenade are assessed, a total thirty streets.

### The Cliffs and North Town Centre

- 4.7 Table A3:5 shows the assessment for the six streets in this part of the resort. The Cliffs contains three streets all of which appear to be performing well at present.
- 4.8 North Town Centre involves three separate street sections around the Lord Street/Banks Street area. There is evidence of pressure for change with unlawful activity and properties on the market but overall the 3 sections are still performing their main role as providers of holiday accommodation.

### South Town Centre

- 4.9 Table A3.6 shows the eleven streets which are included in the South Town Centre area. Two streets, (Reads Avenue, STC10, and Palatine Road, STC11) have changed since 2011, in particular the amount of non-trading accommodation on Palatine. Two further streets, (Havelock Street, STC05, and Adelaide Street, STC06) only include

properties on one side of the road and in each case there is increasing pressure for change. The remaining seven streets are generally performing well.

### Foxhall and South Beach

- 4.10 Table A3:7 shows the assessment for the two streets in the Foxhall area. York Street, between Singleton Street and Coop Street (FOX01) has seen significant change since 2011, with a high number of non-trading properties and increased pressure for change. Bairstow Street, between Dale Street and Caroline Street (FOX02) is still performing its role as a holiday accommodation street.
- 4.11 The South Beach area includes 5 streets in total and is shown in Table A3:8. There is evidence of pressure for change but in general the streets are still performing their role as holiday accommodation streets.

### Pleasure Beach

- 4.12 The Pleasure Beach area is shown in Table A3:9 and covers six streets in total. This area has seen the most change since 2011 and in the case of two streets (Withnell Road, PB03, and Balmoral Road, PB05) the predominance of active holiday accommodation uses has dropped below 50% and the streets are now mixed use in character.

## 5.0 Conclusions

- 5.1 The assessment covers a range of criteria and the results are mixed throughout the areas both on and off the Promenade. It is a snapshot based on the current data and therefore will require careful monitoring to assesses any further change.
- 5.2 The Promenade demonstrates some of the best results but a number of streets off the Promenade are also performing well, such as Empress Drive (CL01), King Edward Avenue (CL02), Hull Road (STC02), Albert Road, between Coronation Street and Leopold Grove (STC07) and Station Road (PB02).
- 5.3 Only two streets out of the 30 off the Promenade have fallen below 50% for predominance of active holiday accommodation uses and despite increased pressure for change overall the areas are still performing their role as areas of concentrations of holiday accommodation.
- 5.4 The assessment is included in the Stage 1 report in the options explored in section 8.

**Table A3:4 - Assessment Summaries – Promenade Frontage**

Key Promenade Frontage	R1
(A) Sustainable location	G
(B) Predominance of active HA uses	G
(C) Proportion of holiday accommodation not trading	G
(D) Street Character	G
(E) Incidence of accreditation	G
(F) Pressure for change - currently on the market	O
(G) Pressure for change - long term on the mkt	G
(H) Pressure for change - planning enquiries	G
(I) Evidence of unlawful activity	G
Summary: The key promenade frontage is performing well against the criteria.	
Overview: Performing well.	

Norbreck and Bispham Promenade	O1
(A) Sustainable location	G
(B) Predominance of active HA uses	R
(C) Proportion of holiday accommodation not trading	O
(D) Street Character	G
(E) Incidence of accreditation	O
(F) Pressure for change - currently on the market	O
(G) Pressure for change - long term on the mkt	G
(H) Pressure for change - planning enquiries	O
(I) Evidence of unlawful activity	O
Summary: The predominant use is no longer that of active holiday accommodation with other uses such as residential interspersed within the promenade frontage. Amending the boundaries to remove residential uses will lead to a fragmented area.	
Overview: This section of the Promenade has fallen below 50% predominant active holiday accommodation use. Some historical residential properties within this frontage.	

North Town Centre Promenade	O2
(A) Sustainable location	G
(B) Predominance of active HA uses	G
(C) Proportion of holiday accommodation not trading	O
(D) Street Character	G
(E) Incidence of accreditation	O
(F) Pressure for change - currently on the market	O
(G) Pressure for change - long term on the mkt	G
(H) Pressure for change - planning enquiries	G
(I) Evidence of unlawful activity	G
Summary: The north town centre promenade is performing well against the criteria, although the numbers 'not trading' has increased and should be monitored. No amendments to the current boundaries are required.	
Overview: Performing well.	

South Promenade	O3
(A) Sustainable location	G
(B) Predominance of active HA uses	O
(C) Proportion of holiday accommodation not trading	O
(D) Street Character	G
(E) Incidence of accreditation	O
(F) Pressure for change - currently on the market	O
(G) Pressure for change - long term on the mkt	O
(H) Pressure for change - planning enquiries	O
(I) Evidence of unlawful activity	O
Summary: The predominance of active holiday accommodation is only just over 60% and there is increasing pressure for change.	
Overview: Large stretch of Promenade frontage which includes some commercial uses as well as holiday accommodation uses.	

Pleasure Beach Promenade	O4
(A) Sustainable location	G
(B) Predominance of active HA uses	G
(C) Proportion of holiday accommodation not trading	O
(D) Street Character	G
(E) Incidence of accreditation	O
(F) Pressure for change - currently on the market	G
(G) Pressure for change - long term on the mkt	G
(H) Pressure for change - planning enquiries	O
(I) Evidence of unlawful activity	G
Summary: Although the predominance of active holiday accommodation uses remains high (77%) the number of those not trading has increased considerably, in particular on Bourne Crescent.	
Overview: Performing well. Some non-trading properties within Bourne Crescent.	



**Table A3:5 - Assessment Summaries – The Cliffs Area and North Town Centre**

Empress Drive	CL01
(A) Sustainable location	G
(B) Predominance of active HA uses	G
(C) Proportion of holiday accommodation not trading	G
(D) Street Character	G
(E) Incidence of accreditation	O
(F) Pressure for change - currently on the market	R
(G) Pressure for change - long term on the mkt	G
(H) Pressure for change - planning enquiries	G
(I) Evidence of unlawful activity	O
Summary: Is one of 9 streets out of 30 off the Promenade where over 75% of the uses are those of holiday accommodation. Is one of 13 streets out of 30 where less than 10% of the holiday accommodation is not trading. One of 5 streets where more than 40% of the holiday accommodation is currently on the market.	
Overview: overall the street is performing well and is one of the top 5 performers.	

King Edward Avenue	CL02
(A) Sustainable location	G
(B) Predominance of active HA uses	O
(C) Proportion of holiday accommodation not trading	G
(D) Street Character	G
(E) Incidence of accreditation	G
(F) Pressure for change - currently on the market	O
(G) Pressure for change - long term on the mkt	O
(H) Pressure for change - planning enquiries	G
(I) Evidence of unlawful activity	G
Summary: Is one of 13 streets out of 30 where less than 10% of the holiday accommodation is not trading. The only street off the Promenade where accreditation levels exceed 40%.	
Overview: overall the street is performing well and is one of the top 5 performers.	

Gynn Avenue	CL03
(A) Sustainable location	G
(B) Predominance of active HA uses	G
(C) Proportion of holiday accommodation not trading	O
(D) Street Character	O
(E) Incidence of accreditation	O
(F) Pressure for change - currently on the market	O
(G) Pressure for change - long term on the mkt	O
(H) Pressure for change - planning enquiries	G
(I) Evidence of unlawful activity	R
Summary: Is one of 9 streets out of 30 off the Promenade where over 75% of the uses are those of holiday accommodation. One of 7 streets where unlawful activity has been evidenced on over 15% of the holiday accommodation uses.	
Overview: Showing signs of unlawful activity.	

Lord Street (between Yates Street and Mount Street)	NTC01
(A) Sustainable location	G
(B) Predominance of active HA uses	O
(C) Proportion of holiday accommodation not trading	G
(D) Street Character	G
(E) Incidence of accreditation	O
(F) Pressure for change - currently on the market	R
(G) Pressure for change - long term on the mkt	O
(H) Pressure for change - planning enquiries	O
(I) Evidence of unlawful activity	O
Summary: Is one of 13 streets out of 30 where less than 10% of the holiday accommodation is not trading. One of 5 streets where more than 40% of the holiday accommodation is currently on the market.	
Overview: Overall the street is still performing its main function as a holiday accommodation area.	

Lord Street (between Banks Street and Springfield Road)	NTC02
(A) Sustainable location	G
(B) Predominance of active HA uses	O
(C) Proportion of holiday accommodation not trading	O
(D) Street Character	O
(E) Incidence of accreditation	R
(F) Pressure for change - currently on the market	O
(G) Pressure for change - long term on the mkt	G
(H) Pressure for change - planning enquiries	G
(I) Evidence of unlawful activity	R
Summary: One of 18 streets, more than half of the 30, where less than 15% of holiday accommodation is accredited. One of 7 streets where unlawful activity has been evidenced on over 15% of the holiday accommodation uses.	
Overview: Showing signs of unlawful activity.	

Banks Street (between Promenade and Dickson Road)	NTC03
(A) Sustainable location	G
(B) Predominance of active HA uses	O
(C) Proportion of holiday accommodation not trading	O
(D) Street Character	O
(E) Incidence of accreditation	R
(F) Pressure for change - currently on the market	O
(G) Pressure for change - long term on the mkt	G
(H) Pressure for change - planning enquiries	O
(I) Evidence of unlawful activity	O
Summary: One of 18 streets, more than half of the 30, where less than 15% of holiday accommodation is accredited.	
Overview: overall the street is still performing its main function as a holiday accommodation area.	

**Table A3:6 - Assessment Summaries – South Town Centre**

Albert Road (between Central Drive and Coronation Street)	STC01
(A) Sustainable location	G
(B) Predominance of active HA uses	O
(C) Proportion of holiday accommodation not trading	O
(D) Street Character	O
(E) Incidence of accreditation	O
(F) Pressure for change - currently on the market	R
(G) Pressure for change - long term on the mkt	R
(H) Pressure for change - planning enquiries	G
(I) Evidence of unlawful activity	O
Summary: One of 5 streets where more than 40% of the holiday accommodation is currently on the market. One of 4 streets where more than 20% of the holiday accommodation has been on the market for over 5 years.	
Overview: Showing signs of pressure for change with properties on the market.	

Hull Road	STC02
(A) Sustainable location	G
(B) Predominance of active HA uses	G
(C) Proportion of holiday accommodation not trading	G
(D) Street Character	G
(E) Incidence of accreditation	O
(F) Pressure for change - currently on the market	G
(G) Pressure for change - long term on the mkt	G
(H) Pressure for change - planning enquiries	O
(I) Evidence of unlawful activity	O
Summary: Is one of 9 streets out of 30 off the Promenade where over 75% of the uses are those of holiday accommodation. Is one of 13 streets out of 30 where less than 10% of the holiday accommodation is not trading.	
Overview: overall the street is performing well and is one of the top 5 performers.	

Vance Road	STC03
(A) Sustainable location	G
(B) Predominance of active HA uses	O
(C) Proportion of holiday accommodation not trading	O
(D) Street Character	G
(E) Incidence of accreditation	O
(F) Pressure for change - currently on the market	O
(G) Pressure for change - long term on the mkt	O
(H) Pressure for change - planning enquiries	O
(I) Evidence of unlawful activity	O
Summary:	
Overview: overall the street is still performing its main function as a holiday accommodation area.	

Hornby Road (between Central Drive and Coronation Street)	STC04
(A) Sustainable location	G
(B) Predominance of active HA uses	G
(C) Proportion of holiday accommodation not trading	O
(D) Street Character	G
(E) Incidence of accreditation	R
(F) Pressure for change - currently on the market	O
(G) Pressure for change - long term on the mkt	O
(H) Pressure for change - planning enquiries	G
(I) Evidence of unlawful activity	G
Summary: Is one of 9 streets out of 30 off the Promenade where over 75% of the uses are those of holiday accommodation. One of 18 streets, more than half of the 30, where less than 15% of holiday accommodation is accredited.	
Overview: overall the street is still performing its main function as a holiday accommodation area.	

Havelock Street	STC05
(A) Sustainable location	G
(B) Predominance of active HA uses	G
(C) Proportion of holiday accommodation not trading	G
(D) Street Character	R
(E) Incidence of accreditation	R
(F) Pressure for change - currently on the market	O
(G) Pressure for change - long term on the mkt	R
(H) Pressure for change - planning enquiries	G
(I) Evidence of unlawful activity	R
Summary: Is one of 9 streets out of 30 off the Promenade where over 75% of the uses are those of holiday accommodation. Is one of 13 streets out of 30 where less than 10% of the holiday accommodation is not trading. Overall street character is mixed. One of 18 streets, where less than 15% of holiday accommodation is accredited. One of 4 streets where more than 20% of the holiday accommodation has been on the market for over 5 years. One of 7 streets where unlawful activity has been evidenced on over 15% of the holiday accommodation uses.	
Overview: One of the 6 poorest performing streets. Showing signs of both pressure for change with properties on the market, and an increase in unlawful activity.	

Adelaide Street	STC06
(A) Sustainable location	G
(B) Predominance of active HA uses	O
(C) Proportion of holiday accommodation not trading	O
(D) Street Character	O
(E) Incidence of accreditation	R
(F) Pressure for change - currently on the market	R
(G) Pressure for change - long term on the mkt	R
(H) Pressure for change - planning enquiries	G
(I) Evidence of unlawful activity	O
Summary: One of 18 streets, more than half of the 30, where less than 15% of holiday accommodation is accredited. One of 5 streets where more than 40% of the holiday accommodation is currently on the market. One of 4 streets where more than 20% of the holiday accommodation has been on the market for over 5 years.	
Overview: One of the 6 poorest performing streets. Showing signs of pressure for change with properties on the market.	

Albert Road (between Coronation Street and Leopold Grove)	STC07
(A) Sustainable location	G
(B) Predominance of active HA uses	G
(C) Proportion of holiday accommodation not trading	G
(D) Street Character	G
(E) Incidence of accreditation	O
(F) Pressure for change - currently on the market	G
(G) Pressure for change - long term on the mkt	G
(H) Pressure for change - planning enquiries	G
(I) Evidence of unlawful activity	O
Summary: Is one of 9 streets out of 30 off the Promenade where over 75% of the uses are those of holiday accommodation. Is one of 13 streets out of 30 where less than 10% of the holiday accommodation is not trading.	
Overview: overall the street is performing well and is one of the top 5 performers.	

Charnley Road	STC08
(A) Sustainable location	G
(B) Predominance of active HA uses	O
(C) Proportion of holiday accommodation not trading	O
(D) Street Character	G
(E) Incidence of accreditation	R
(F) Pressure for change - currently on the market	R
(G) Pressure for change - long term on the mkt	R
(H) Pressure for change - planning enquiries	G
(I) Evidence of unlawful activity	O
Summary: One of 18 streets, more than half of the 30, where less than 15% of holiday accommodation is accredited. One of 5 streets where more than 40% of the holiday accommodation is currently on the market. One of 4 streets where more than 20% of the holiday accommodation has been on the market for over 5 years.	
Overview: One of the 6 poorest performing streets. Showing signs of pressure for change with properties on the market.	

Hornby Road (between Coronation Street and Regent Road)	STC09
(A) Sustainable location	G
(B) Predominance of active HA uses	O
(C) Proportion of holiday accommodation not trading	G
(D) Street Character	O
(E) Incidence of accreditation	O
(F) Pressure for change - currently on the market	O
(G) Pressure for change - long term on the mkt	O
(H) Pressure for change - planning enquiries	O
(I) Evidence of unlawful activity	G
Summary: Is one of 13 streets out of 30 where less than 10% of the holiday accommodation is not trading. Little evidence of unlawful activity	
Overview: overall the street is still performing its main function as a holiday accommodation area.	

Reads Avenue	STC10
(A) Sustainable location	G
(B) Predominance of active HA uses	O
(C) Proportion of holiday accommodation not trading	O
(D) Street Character	R
(E) Incidence of accreditation	R
(F) Pressure for change - currently on the market	O
(G) Pressure for change - long term on the mkt	O
(H) Pressure for change - planning enquiries	O
(I) Evidence of unlawful activity	O
Summary: Is one of 6 streets where the vitality and condition of the street was considered poor. One of 18 streets, more than half of the 30, where less than 15% of holiday accommodation is accredited.	
Overview: overall the street is still performing its main function as a holiday accommodation area.	

Palatine Road	STC11
(A) Sustainable location	G
(B) Predominance of active HA uses	O
(C) Proportion of holiday accommodation not trading	R
(D) Street Character	R
(E) Incidence of accreditation	R
(F) Pressure for change - currently on the market	O
(G) Pressure for change - long term on the mkt	O
(H) Pressure for change - planning enquiries	O
(I) Evidence of unlawful activity	O
Summary: Is one of 2 streets out of 30 off the Promenade where more than 25% of the holiday accommodation is now not trading. one of 6 streets where the vitality and condition of the street was considered poor. One of 18 streets, more than half of the 30, where less than 15% of holiday accommodation is accredited.	
Overview: One of the 6 poorest performing streets. Despite an increased proportion of not trading overall the street is still performing its main function as a holiday accommodation area.	

**Table A3:7 - Assessment Summaries – Foxhall**

York Street (between Singleton Street and Coop Street)	FOX01
(A) Sustainable location	G
(B) Predominance of active HA uses	O
(C) Proportion of holiday accommodation not trading	R
(D) Street Character	O
(E) Incidence of accreditation	R
(F) Pressure for change - currently on the market	G
(G) Pressure for change - long term on the mkt	O
(H) Pressure for change - planning enquiries	R
(I) Evidence of unlawful activity	R
<p>Summary: Is one of 2 streets out of 30 off the Promenade where more than 25% of the holiday accommodation is now not trading. One of 18 streets, more than half of the 30, where less than 15% of holiday accommodation is accredited. One of 2 streets where planning enquiries for change of use have been greater than 10%. One of 7 streets where unlawful activity has been evidenced on over 15% of the holiday accommodation uses.</p>	
<p>Overview: One of the 6 poorest performing streets. Showing signs of both pressure for change with planning enquiries and an increase in unlawful activity.</p>	

Bairstow Street (between Dale Street and Caroline Street)	FOX02
(A) Sustainable location	G
(B) Predominance of active HA uses	O
(C) Proportion of holiday accommodation not trading	O
(D) Street Character	O
(E) Incidence of accreditation	R
(F) Pressure for change - currently on the market	G
(G) Pressure for change - long term on the mkt	G
(H) Pressure for change - planning enquiries	G
(I) Evidence of unlawful activity	G
<p>Summary: One of 18 streets, more than half of the 30, where less than 15% of holiday accommodation is accredited.</p>	
<p>Overview: overall the street is still performing its main function as a holiday accommodation area.</p>	

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**Table A3:8 - Assessment Summaries – South Beach**

Barton Avenue	SB01
(A) Sustainable location	G
(B) Predominance of active HA uses	O
(C) Proportion of holiday accommodation not trading	G
(D) Street Character	O
(E) Incidence of accreditation	O
(F) Pressure for change - currently on the market	O
(G) Pressure for change - long term on the mkt	G
(H) Pressure for change - planning enquiries	O
(I) Evidence of unlawful activity	O
Summary: Is one of 13 streets out of 30 where less than 10% of the holiday accommodation is not trading.	
Overview: overall the street is still performing its main function as a holiday accommodation area.	

Wellington Road	SB02
(A) Sustainable location	G
(B) Predominance of active HA uses	G
(C) Proportion of holiday accommodation not trading	G
(D) Street Character	O
(E) Incidence of accreditation	R
(F) Pressure for change - currently on the market	O
(G) Pressure for change - long term on the mkt	O
(H) Pressure for change - planning enquiries	O
(I) Evidence of unlawful activity	R
Summary: Is one of 9 streets out of 30 off the Promenade where over 75% of the uses are those of holiday accommodation. Is one of 13 streets out of 30 where less than 10% of the holiday accommodation is not trading. One of 18 streets, more than half of the 30, where less than 15% of holiday accommodation is accredited. One of 7 streets where unlawful activity has been evidenced on over 15% of the holiday accommodation uses.	
Overview: Showing signs of unlawful activity.	

Woodfield Road	SB03
(A) Sustainable location	G
(B) Predominance of active HA uses	O
(C) Proportion of holiday accommodation not trading	O
(D) Street Character	O
(E) Incidence of accreditation	R
(F) Pressure for change - currently on the market	O
(G) Pressure for change - long term on the mkt	G
(H) Pressure for change - planning enquiries	R
(I) Evidence of unlawful activity	O
Summary: One of 18 streets, more than half of the 30, where less than 15% of holiday accommodation is accredited. One of 2 streets where planning enquiries for change of use have been greater than 10%.	
Overview: Showing signs of pressure for change with planning enquiries.	

St Chads Road	SB04
(A) Sustainable location	G
(B) Predominance of active HA uses	O
(C) Proportion of holiday accommodation not trading	O
(D) Street Character	G
(E) Incidence of accreditation	R
(F) Pressure for change - currently on the market	O
(G) Pressure for change - long term on the mkt	O
(H) Pressure for change - planning enquiries	G
(I) Evidence of unlawful activity	O
Summary: One of 18 streets, more than half of the 30, where less than 15% of holiday accommodation is accredited.	
Overview: overall the street is still performing its main function as a holiday accommodation area.	

Alexandra Road	SB05
(A) Sustainable location	G
(B) Predominance of active HA uses	O
(C) Proportion of holiday accommodation not trading	O
(D) Street Character	R
(E) Incidence of accreditation	O
(F) Pressure for change - currently on the market	O
(G) Pressure for change - long term on the mkt	G
(H) Pressure for change - planning enquiries	G
(I) Evidence of unlawful activity	O
Summary: Is one of 6 streets where the vitality and condition of the street was considered poor.	
Overview: overall the street is still performing its main function as a holiday accommodation area.	

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**Table A3:9 - Assessment Summaries – Pleasure Beach**

Dean Street	PB01
(A) Sustainable location	G
(B) Predominance of active HA uses	O
(C) Proportion of holiday accommodation not trading	O
(D) Street Character	O
(E) Incidence of accreditation	R
(F) Pressure for change - currently on the market	G
(G) Pressure for change - long term on the mkt	G
(H) Pressure for change - planning enquiries	G
(I) Evidence of unlawful activity	R
Summary: One of 18 streets, more than half of the 30, where less than 15% of holiday accommodation is accredited. One of 7 streets where unlawful activity has been evidenced on over 15% of the holiday accommodation uses.	
Overview: Showing signs of unlawful activity.	

Station Road	PB02
(A) Sustainable location	G
(B) Predominance of active HA uses	G
(C) Proportion of holiday accommodation not trading	G
(D) Street Character	O
(E) Incidence of accreditation	R
(F) Pressure for change - currently on the market	O
(G) Pressure for change - long term on the mkt	G
(H) Pressure for change - planning enquiries	G
(I) Evidence of unlawful activity	G
Summary: Is one of 9 streets out of 30 off the Promenade where over 75% of the uses are those of holiday accommodation. Is one of 13 streets out of 30 where less than 10% of the holiday accommodation is not trading. One of 18 streets, more than half of the 30, where less than 15% of holiday accommodation is accredited.	
Overview: overall the street is performing well and is one of the top 5 performers.	

Withnell Road	PB03
(A) Sustainable location	G
(B) Predominance of active HA uses	R
(C) Proportion of holiday accommodation not trading	O
(D) Street Character	O
(E) Incidence of accreditation	R
(F) Pressure for change - currently on the market	G
(G) Pressure for change - long term on the mkt	G
(H) Pressure for change - planning enquiries	G
(I) Evidence of unlawful activity	O
Summary: Is one of 2 streets out of 30 off the Promenade where less than 50% of the current uses are those of holiday accommodation. One of 18 streets, more than half of the 30, where less than 15% of holiday accommodation is accredited.	
Overview: The street has fallen below 50% predominant active holiday accommodation use.	

Osborne Road	PB04
(A) Sustainable location	G
(B) Predominance of active HA uses	O
(C) Proportion of holiday accommodation not trading	G
(D) Street Character	O
(E) Incidence of accreditation	R
(F) Pressure for change - currently on the market	G
(G) Pressure for change - long term on the mkt	G
(H) Pressure for change - planning enquiries	O
(I) Evidence of unlawful activity	O
Summary: Is one of 13 streets out of 30 where less than 10% of the holiday accommodation is not trading. One of 18 streets, more than half of the 30, where less than 15% of holiday accommodation is accredited.	
Overview: overall the street is still performing its main function as a holiday accommodation area.	

Balmoral Road	PB05
(A) Sustainable location	G
(B) Predominance of active HA uses	R
(C) Proportion of holiday accommodation not trading	G
(D) Street Character	R
(E) Incidence of accreditation	R
(F) Pressure for change - currently on the market	G
(G) Pressure for change - long term on the mkt	G
(H) Pressure for change - planning enquiries	G
(I) Evidence of unlawful activity	R
Summary: Is one of 2 streets out of 30 off the Promenade where less than 50% of the current uses are those of holiday accommodation. Is one of 13 streets out of 30 where less than 10% of the holiday accommodation is not trading. Is one of 6 streets where the street character was considered mixed. One of 18 streets, more than half of the 30, where less than 15% of holiday accommodation is accredited. One of 7 streets where unlawful activity has been evidenced on over 15% of the holiday accommodation uses.	
Overview: The street has fallen below 50% predominant active holiday accommodation use.	

Clifton Drive	PB06
(A) Sustainable location	G
(B) Predominance of active HA uses	G
(C) Proportion of holiday accommodation not trading	G
(D) Street Character	R
(E) Incidence of accreditation	O
(F) Pressure for change - currently on the market	O
(G) Pressure for change - long term on the mkt	O
(H) Pressure for change - planning enquiries	G
(I) Evidence of unlawful activity	G
Summary: Is one of 9 streets out of 30 off the Promenade where over 75% of the uses are those of holiday accommodation. Is one of 13 streets out of 30 where less than 10% of the holiday accommodation is not trading. Is one of 6 streets where the vitality and condition of the street was considered poor.	
Overview: overall the street is still performing its main function as a holiday accommodation area.	

## APPENDIX 4 – Draft Full Viability Evidence

Applicants will be expected to produce the following information as part of a planning application for change of use from holiday accommodation to residential use within the defined Holiday Accommodation Areas. It is recommended that the viability evidence statement should be produced by a suitably qualified person who is able to provide an objective and informed assessment.

### 1) General Information:

Name of and address of Applicant including telephone and email
Name and address of property subject to this viability test
What is the nature of your controlling interest in the property, the land it sits on and any adjacent land or properties?
How long has the establishment been trading in its current or most recent form? Please provide dates.
Age and condition of the building
Approximate investment on refurbishment and maintenance to the property totalled for each year over the last 10 years

## 2) Trading Information

Number of trading weeks per year over the last 3 years
Total number of available bed spaces per year over the last 3 years
Total number of sleepers per year over the last 3 years
Please supply evidence of your marketing activity over the last 12 months together with what is planned for the next 12 months. This should include evidence of website entries; numbers of site hits; an understanding of how social media has been utilised to drive web traffic; copies of brochures, adverts and entries in accommodation guides. Where applicable, justification should be provided as to why various marketing methods have not been used.
Please supply a copy of your Business Plan. If you do not have one then, as a bare minimum, please provide a summary of your Business Activity and Target Markets over the last 12 months and what is planned for the next 12 months.



**3) Financial Information**

Audited Profit and Loss Account covering the previous three years.
<i>Abridged Accounts may be acceptable subject to agreement with the Development Management Team</i>
Net income from rooms
Net income from food and beverages
Any other net income generated from the business
Net achieved room rate
Trading profit before interest, tax, depreciation and amortisation
Breakdown of annual running costs for the business over the last 3 years including: wages, utilities, rates, food, beverage, additional guest services, administration costs, laundry, insurance, business to customer marketing, bank interest/charges, staff training and any other operating costs
Number of people employed including applicant and applicants family split full time and part time

#### **4) Business planning and performance against targets**

If no recent trading history exists, an annual business plan with cash flow projections is expected to be submitted, which could include (where applicable) a business plan used to secure a bank loan/financial investment and should also include the detailed running costs outlined above under the 'Financial Information' section. However, if a Business Plan does not exist then applicants should provide written justification as to why one has not been prepared.

#### **5) Details of the physical condition of the property**

Where the physical condition of the property is being used as a reason for impacting upon the future viability of the business, a surveyor's report incorporating the costs of repairs should be submitted. These costings should be competitive and where possible details of tradesman's quotes should be submitted.

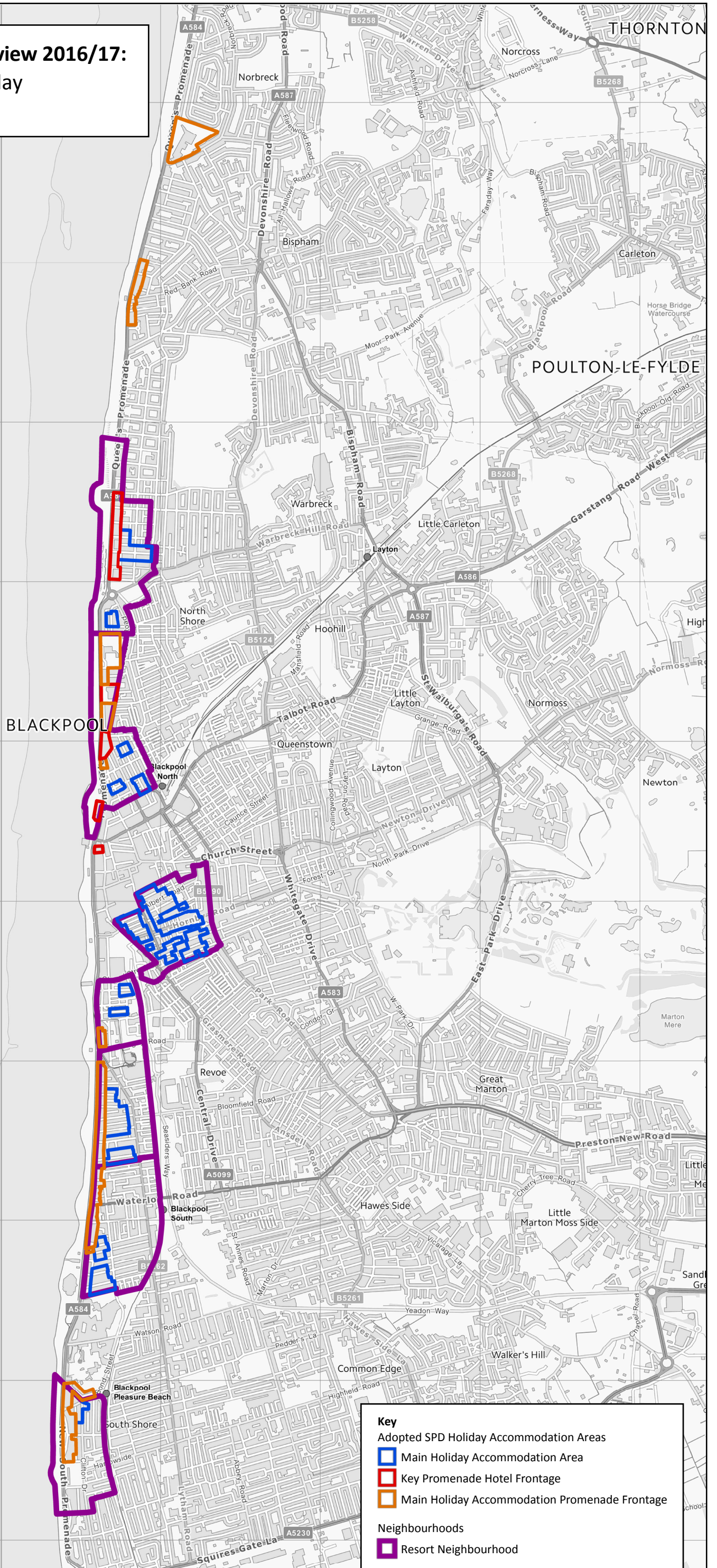
#### **6) Commercial marketing of the business**

Evidence should be submitted that there has been a realistic attempt to sell the business normally over a minimum 18 month period. It is expected that the business should be marketed at a realistic and competitive price. The evidence should include:-

- Details of the agent used to market the business for sale, including whether they have any local or specialist expertise, and evidence of passive/ active marketing.
- Copies of advertising material to include sale particulars, website entries, brochures, etc,
- Details of dates advertised, records of responses received, what interest has been shown and why any offers have been rejected,
- Details of owners' brief to agent on the marketing of the business and agreed sale price.



**Holiday Accommodation Area SPD Review 2016/17:**  
**Plan 1: Resort Neighbourhoods & Holiday Accommodation Areas**



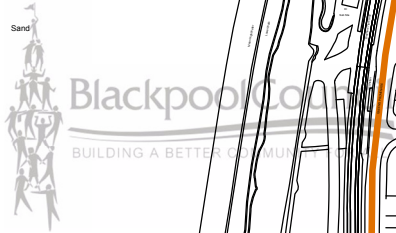
**Key**

- Adopted SPD Holiday Accommodation Areas
- Blue square: Main Holiday Accommodation Area
  - Red square: Key Promenade Hotel Frontage
  - Orange square: Main Holiday Accommodation Promenade Frontage
- Neighbourhoods
- Purple square: Resort Neighbourhood



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**Holiday Accommodation Area SPD Review 2016/17:  
Plan 2a: Norbreck and Bispham -  
Land Use, Accreditation & Properties on the Market**



**Key**

Adopted SPD Holiday Accommodation Areas (2011)

- Main Holiday Accommodation Area
- Key Promenade Hotel Frontage
- Main Holiday Accommodation Promenade Frontage

Land Use (updated November 2016)

- Commercial
- Holiday Flats (Not Trading)
- Holiday Flats
- Hotel / Guest House (Not Trading)
- Hotel / Guest House
- Residential

Accredited Accommodation (December 2016)

- ◆ Visit Britain / AA Accreditation

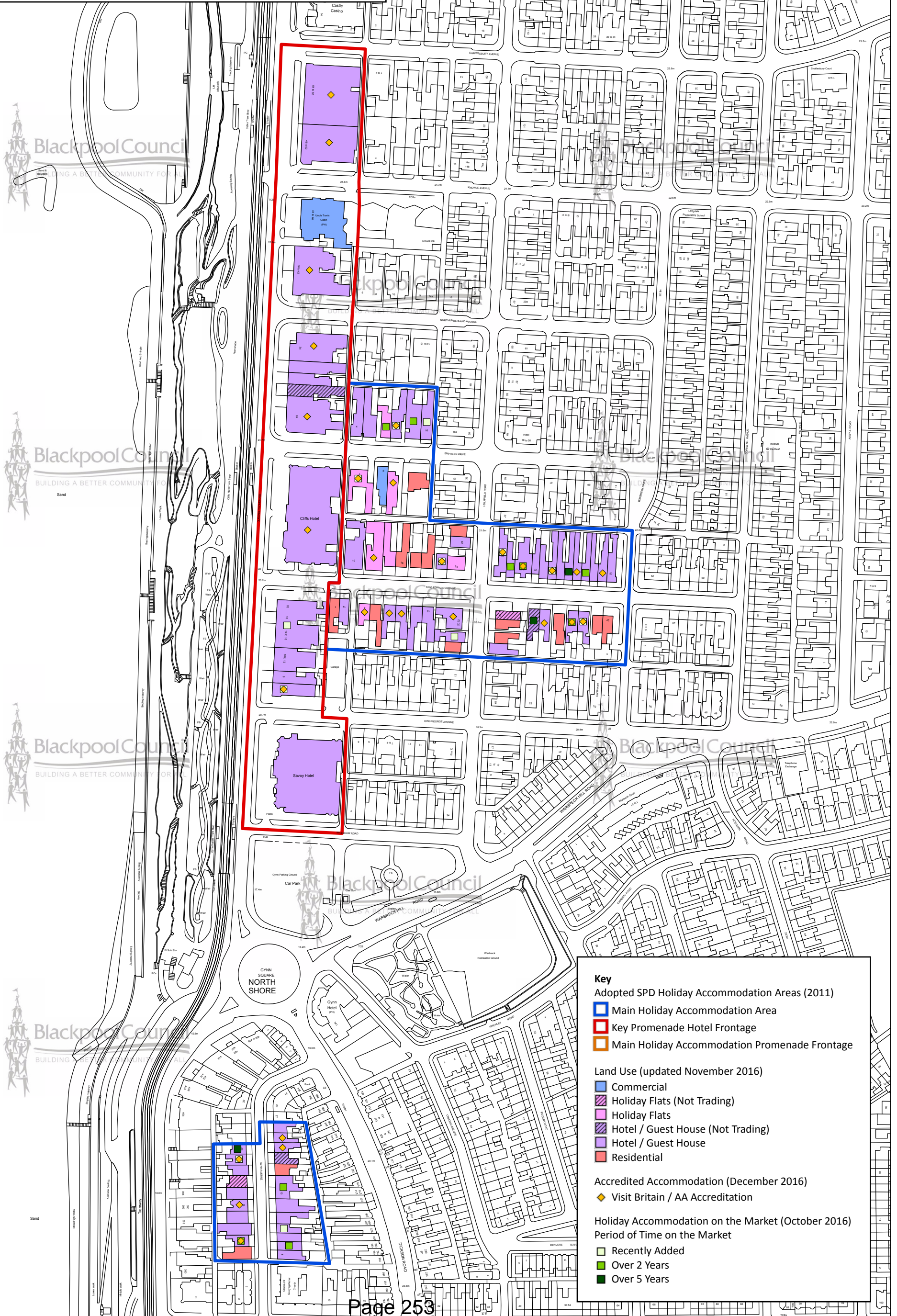
Holiday Accommodation on the Market (October 2016)  
Period of Time on the Market

- Recently Added
- Over 2 Years
- Over 5 Years



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**Holiday Accommodation Area SPD Review 2016/17:**  
**Plan 2b: North Shore and Cliffs inc. Gynn Avenue -**  
**Land Use, Accreditation & Properties on the Market**



**Key**

- Adopted SPD Holiday Accommodation Areas (2011)
  - Main Holiday Accommodation Area
  - Key Promenade Hotel Frontage
  - Main Holiday Accommodation Promenade Frontage
- Land Use (updated November 2016)
  - Commercial
  - Holiday Flats (Not Trading)
  - Holiday Flats
  - Hotel / Guest House (Not Trading)
  - Hotel / Guest House
  - Residential
- Accredited Accommodation (December 2016)
  - ◆ Visit Britain / AA Accreditation
- Holiday Accommodation on the Market (October 2016)
  - Period of Time on the Market
    - Recently Added
    - Over 2 Years
    - Over 5 Years

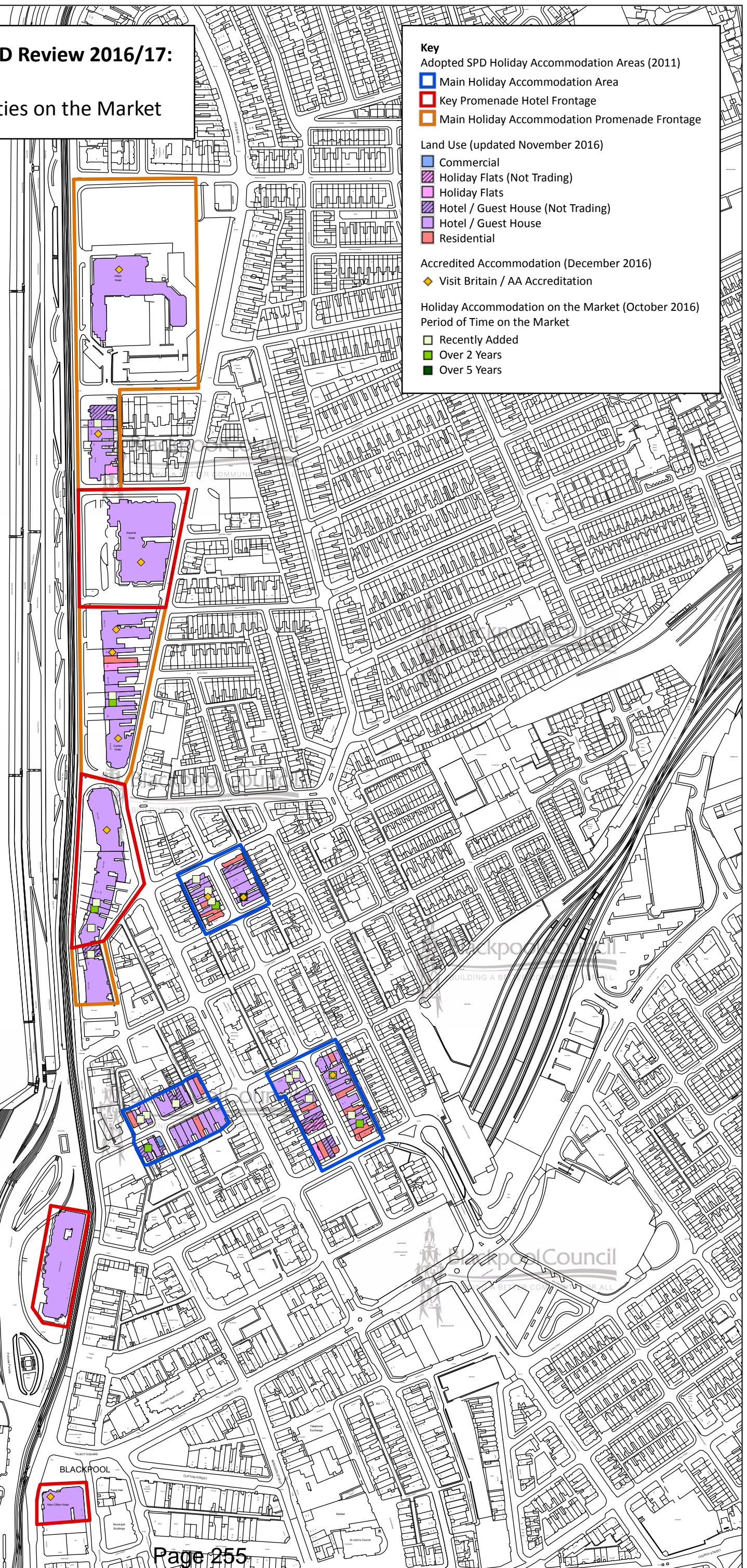


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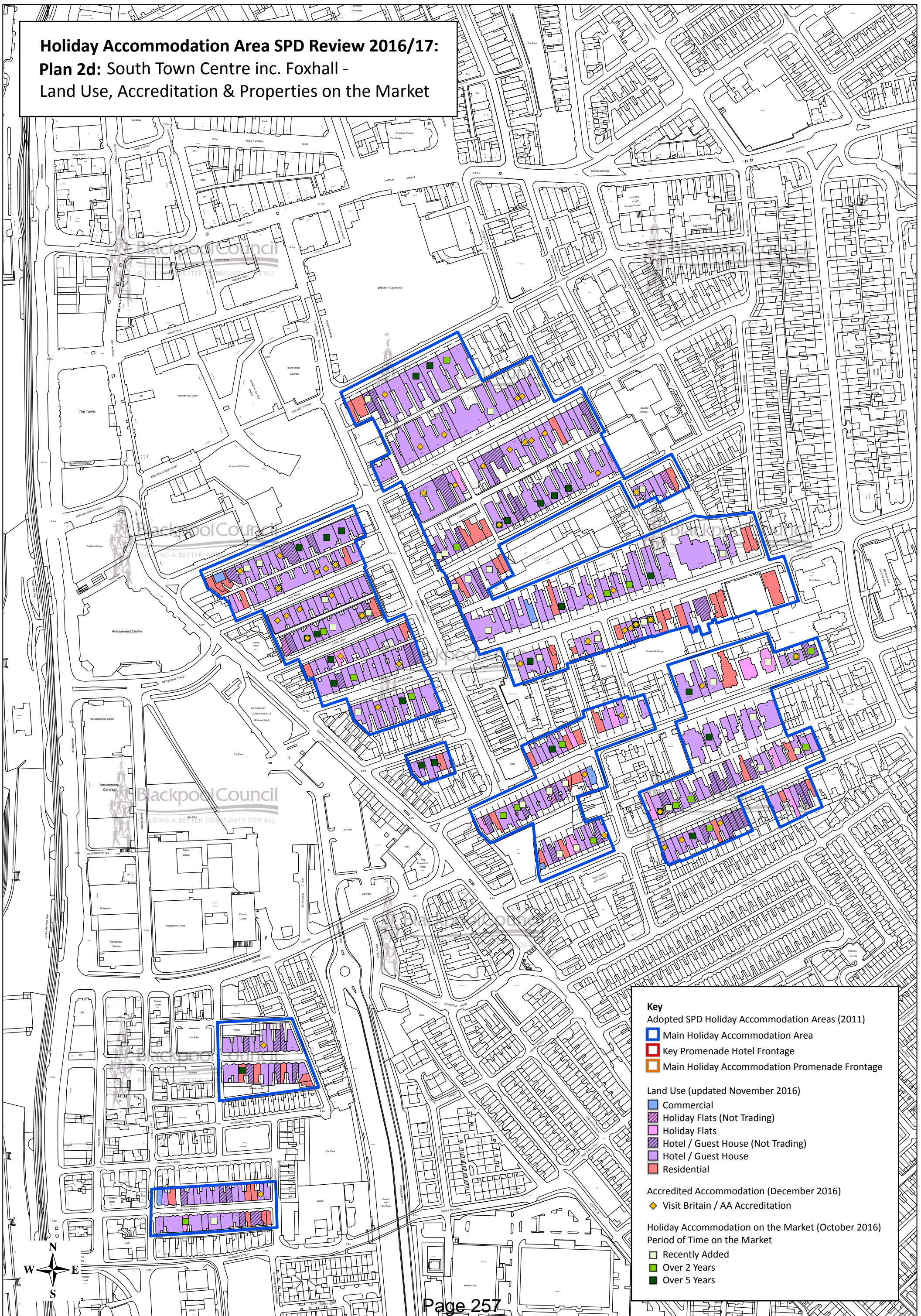
**Holiday Accommodation Area SPD Review 2016/17:  
Plan 2c: North Town Centre -  
Land Use, Accreditation & Properties on the Market**

- Key**
- Adopted SPD Holiday Accommodation Areas (2011)
  - Blue outline: Main Holiday Accommodation Area
    - Red outline: Key Promenade Hotel Frontage
    - Orange outline: Main Holiday Accommodation Promenade Frontage
  - Land Use (updated November 2016)
    - Blue: Commercial
    - Pink: Holiday Flats (Not Trading)
    - Light Pink: Holiday Flats
    - Light Purple: Hotel / Guest House (Not Trading)
    - Dark Purple: Hotel / Guest House
    - Red: Residential
  - Accredited Accommodation (December 2016)
    - Yellow diamond: Visit Britain / AA Accreditation
  - Holiday Accommodation on the Market (October 2016)  
Period of Time on the Market
    - Light Green: Recently Added
    - Green: Over 2 Years
    - Dark Green: Over 5 Years



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**Holiday Accommodation Area SPD Review 2016/17:  
Plan 2d: South Town Centre inc. Foxhall -  
Land Use, Accreditation & Properties on the Market**



**Key**

Adopted SPD Holiday Accommodation Areas (2011)

- Main Holiday Accommodation Area
- Key Promenade Hotel Frontage
- Main Holiday Accommodation Promenade Frontage

Land Use (updated November 2016)

- Commercial
- Holiday Flats (Not Trading)
- Holiday Flats
- Hotel / Guest House (Not Trading)
- Hotel / Guest House
- Residential

Accredited Accommodation (December 2016)

- ◆ Visit Britain / AA Accreditation

Holiday Accommodation on the Market (October 2016)  
Period of Time on the Market

- Recently Added
- Over 2 Years
- Over 5 Years

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**Holiday Accommodation Area SPD Review 2016/17:**  
**Plan 2e: South Beach inc. Pleasure Beach North -**  
**Land Use, Accreditation & Properties on the Market**



**Key**

- Adopted SPD Holiday Accommodation Areas (2011)
- Main Holiday Accommodation Area
- Key Promenade Hotel Frontage
- Main Holiday Accommodation Promenade Frontage

Land Use (updated November 2016)

- Commercial
- Holiday Flats (Not Trading)
- Holiday Flats
- Hotel / Guest House (Not Trading)
- Hotel / Guest House
- Residential

Accredited Accommodation (December 2016)

- ◆ Visit Britain / AA Accreditation

Holiday Accommodation on the Market (October 2016)

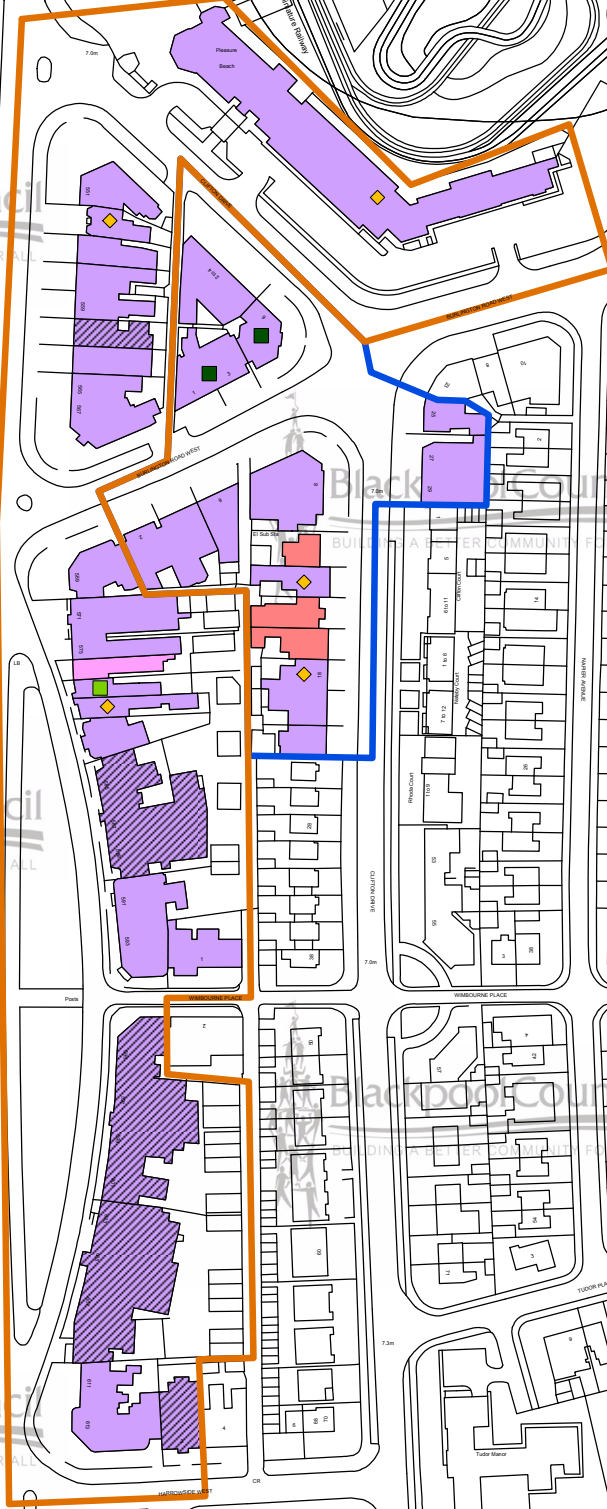
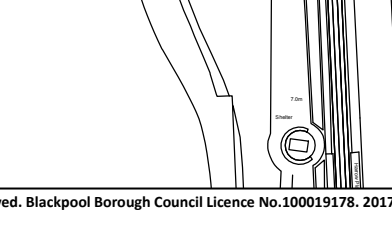
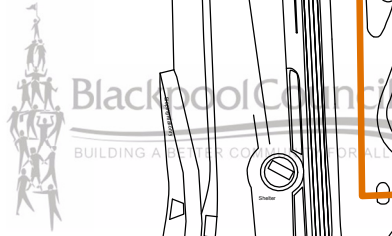
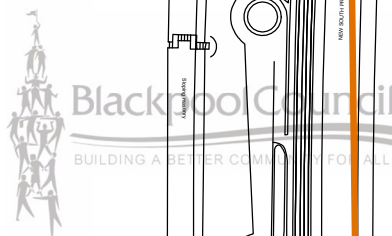
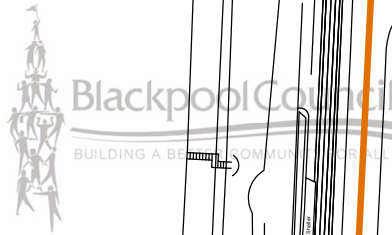
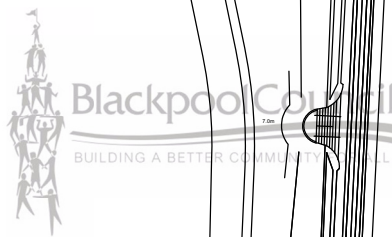
Period of Time on the Market

- Recently Added
- Over 2 Years
- Over 5 Years



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**Holiday Accommodation Area SPD Review 2016/17:**  
**Plan 2f: Pleasure Beach South -**  
**Land Use, Accreditation & Properties on the Market**



**Key**

- Adopted SPD Holiday Accommodation Areas (2011)
- Main Holiday Accommodation Area
- Key Promenade Hotel Frontage
- Main Holiday Accommodation Promenade Frontage

**Land Use (updated November 2016)**

- Commercial
- Holiday Flats (Not Trading)
- Holiday Flats
- Hotel / Guest House (Not Trading)
- Hotel / Guest House
- Residential

**Accredited Accommodation (December 2016)**

- ◆ Visit Britain / AA Accreditation

**Holiday Accommodation on the Market (October 2016)**

**Period of Time on the Market**

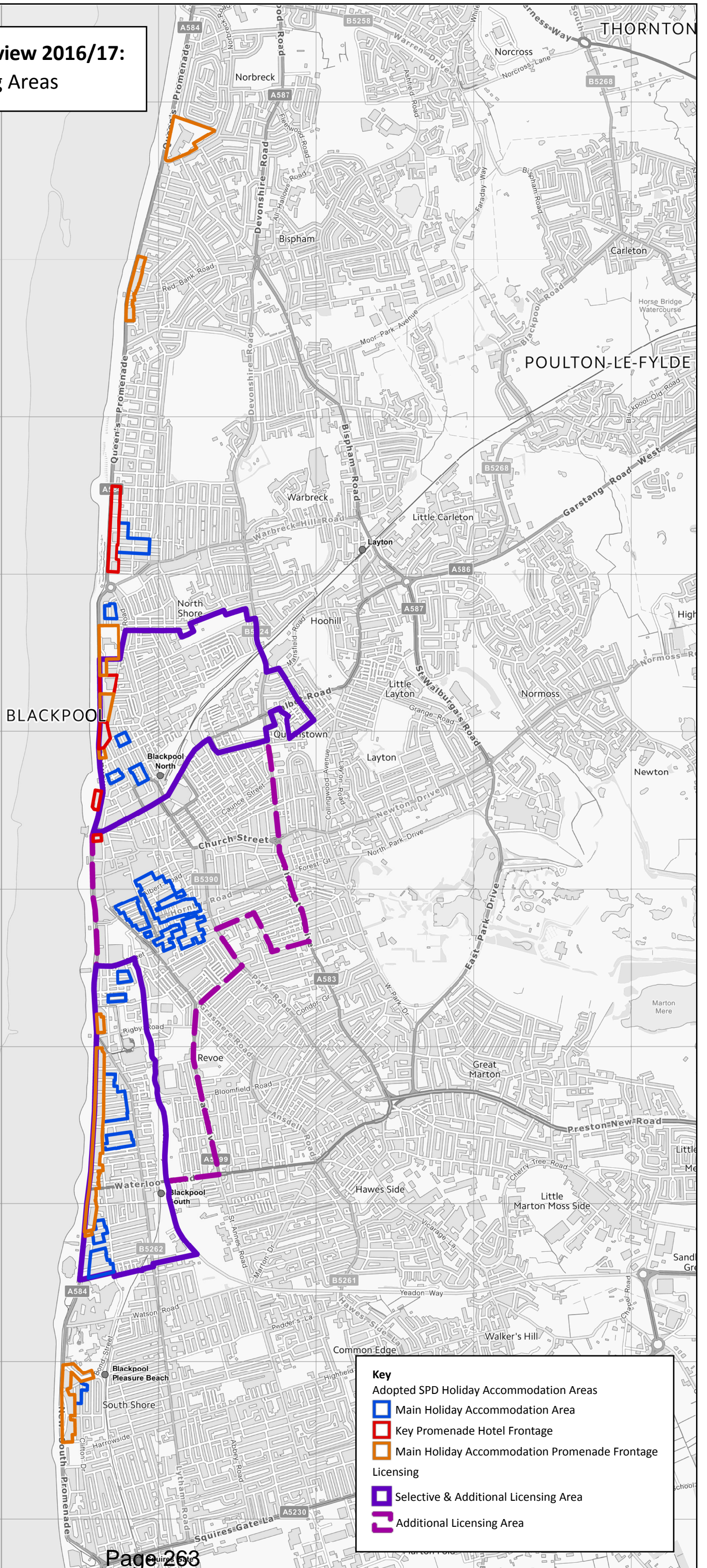
- Recently Added
- Over 2 Years
- Over 5 Years



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**Holiday Accommodation Area SPD Review 2016/17:  
Plan 3: Selective & Additional Licensing Areas**



**Key**

- Adopted SPD Holiday Accommodation Areas
- ▭ Main Holiday Accommodation Area
- ▭ Key Promenade Hotel Frontage
- ▭ Main Holiday Accommodation Promenade Frontage
- Licensing
- ▭ Selective & Additional Licensing Area
- ▭ Additional Licensing Area



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