

Mr G Johnston
Blackpool Council
Development Management Section
PO Box 17
Corporation Street
Blackpool FY1 1LZ



14 Regent's Wharf
All Saints Street
London N1 9RL
020 7837 4477
london@nlplanning.com
nlplanning.com

Date 11 September 2015
Our ref 04051/68/NT/NMa/9628836v4
Your ref 15/0420

Dear Mr Johnston,

Blackpool: Planning Application submitted by Rowland Homes Ltd and NS&I at Department for National Savings & Investments Site, Mythop Road, Blackpool FY3 9YP (Ref: 15/0420)

Bourne Leisure Ltd has asked that we respond to the hybrid planning application (ref: 15/0420) submitted by Rowland Homes Ltd and NS&I at the Department for National Savings & Investments Site, Mythop Road, Blackpool.

Bourne Leisure operate the Marton Mere Caravan Park (on land owned by Blackpool Borough Council) which abuts part of the application site. You will appreciate that the Park contributes significantly to the area's tourism offer and provides significant economic benefits to the local and wider area. In the widest sense, it is an employment use. Following a thorough review of the planning application we have identified a number of significant concerns with the application proposals and Bourne Leisure Ltd therefore OBJECTS to the planning application for the reasons set out below. The reasons relate to compliance with planning policy relating to employment uses, deficiencies with the submitted application documentation and also to general concerns in respect of those planning considerations pertinent to the determination of this application.

Employment Uses on the Site and Planning Policy

The application site is allocated as Industrial / Business Land under saved Policy DE1 of the Blackpool Local Plan. More specifically, it is located within identified site 'E3 Preston New Road' which is allocated for Class B uses only. The basic policy position is, therefore, one of securing the use of this site for further employment generating uses.

The main concern relates to the proposed introduction of residential development on a site which is designated for employment use. As highlighted below, if the Council intend to show some flexibility in terms of the acceptable uses on this site, Bourne Leisure considers that a mixed use site comprising an extension to the caravan park and employment uses would be much more appropriate from a policy position than the current proposals. A caravan park, whilst a designated leisure use generates capital investment, jobs and increased trade in the local community. This use would be complimentary to wider employment uses on the site.



The section relating to Employment in the applicant's Planning Statement (paragraph 4.4) refers to the submitted viability assessment. It states that *'The viability assessment demonstrates that the site has been marketed in excess of five years with little or no interest.'* It then goes on to state that *'given the need to address site constraints, including the provision of a new access off Preston New Road and given the supply and take up of Use Class B1 space in the Borough, the viability assessment demonstrates that higher value end uses will be required on part of the site to assist the delivery of employment premises.'*

We would dispute the above comments in relation to the interest shown in the site. Bourne Leisure Ltd has shown more than just "a little interest" in the site over the last couple of years including putting in a bid on 10 October 2013 (approved by its Board) to purchase the site and discussions with Blackpool Council Chief Executive and Assistant Chief Executives for Built Environment and Regeneration, Tourism and Culture in respect of the site. Bourne Leisure Ltd is a committed and well respected employer in the area and is always looking to improve the tourism offer to visitors to the area.

Bourne Leisure Ltd is clearly a key employment generator and a major contributor to the local economy through both direct employment provision and indirect employment provision through its use of local services and suppliers. As a result, it is clear that there are non-residential uses for the site which would retain and enhance the site as a significant employment generator, meeting the aspiration of policy DE1 of the Local Plan. We are concerned that this potential is not being explored further particularly as this approach would be compliant with existing local policy and would not rely on inappropriate residential development having to be brought forward.

Delivery of Employment Land

We can find no references in any of the submitted documentation to any trigger points which control the delivery of the future employment site particularly with regards to requirements to:

- i Demolish all the existing buildings;
- ii The conditions of the cleared site;
- iii The assumed basis on which the development site will be marketed and development values.

Can the Council identify whether there are controls proposed to require the applicant to demolish the existing office buildings and bring forward the remaining land (for employment uses)? Should planning permission be granted the Council will need to ensure that appropriate trigger points and phasing of the residential development is controlled through a s106 Agreement.

Notwithstanding the above comments relating to planning policy compliance, we recognise that the Council has an application to determine and, as such, we highlight below a range of issues relating to the submitted application.

Ecological Impact Assessment and Risk Assessment for Great Crested Newts

The information provided explains that surveys were undertaken of the site in 2007, 2008 and 2011 and a desk-top assessment was repeated in 2012 using various web based resources. No further survey work appears to have been done since 2012. Most concerning is the lack of any recognition relating to requirements for bat survey work particularly as proposals involve the demolition of buildings.



In these circumstances, we are not convinced that the Council has been provided with up-to-date information on habitats or protected species (including bats, great crested newts, water vole or breeding birds). These reports appear to be insufficient to allow the Council to make an informed assessment of ecological matters and, as a result, further extensive survey work is required to allow the application to be determined.

Highways Impact

We are concerned about the implications of the proposed new access to and from the site proposed on Preston New Road - the main dual carriageway leading into and out of Blackpool town centre and a road designated in the Local Plan as a '*primary distributor route*'. The proposals may cause congestion and highway safety concerns, as traffic would have to cross a busy and at peak times congested dual carriageway.

Insufficient accompanying documentation

An application of this nature and scale should be accompanied by the following documentation:

- 1 Noise and Vibration Assessment – to consider the demolition, construction and operational implications of the proposed development (particularly in relation to the proposed commercial units and the impacts on those staying at Marton Mere (and such analysis should address impacts on nearby residents).
- 2 Visual Impact Assessment – to assess the implications of the development particularly in respect of the statutory designations affecting the site.

These are standard application requirements for a development such as the one being applied for, regardless of the fact that part of the application is made in outline form. Without the above information officers remain unable to undertake a robust assessment of the merits of the application.

Viability Assessment

We note a Viability Assessment has been provided and we would wish to be informed about how the Council will undertake an independent assessment of the document, particularly to determine whether the land value set against future employment uses appropriate. We consider that a broad range of employment uses should be assessed, including leisure uses.

Screening letter and EIA

The Screening Opinion provided by the Council is dated November 2014. Since this date, including amended EIA Regulations 2015 have been introduced – the assessment of whether the application constitutes EIA development or not should have been based on the new Regulations.

We trust the above comments will be given full consideration during the determination of the application. As outlined in this letter, the application contains several deficiencies in terms of the level and quantity of information provided to accompany the application. As a result in the current form this planning application should be refused.

Should further information or changes to the scheme be provided we would reserve the right to provide additional comments.

If you wish to discuss any aspect of this letter further please do not hesitate to contact me.



Nathaniel Lichfield
& Partners
Planning. Design. Economics.

Yours sincerely,



Nicholas Thompson
Senior Director, Head of Major Projects and Design

Cc I. Pennell Bourne Leisure
 M. Brunton A&M Architectural Partnership LLP